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**SOAH DOCKET 473-22-1073
PUBLIC UTILITY COMMISSION OF TEXAS DOCKET NO. 52485**

**APPLICATION OF SOUTHWESTERN)
PUBLIC SERVICE COMPANY TO)
AMEND ITS CERTIFICATE OF)
CONVENIENCE AND NECESSITY TO)
CONVERT HARRINGTON) BEFORE THE STATE OFFICE
GENERATING STATION FROM COAL)
TO NATURAL GAS) OF
)
) ADMINISTRATIVE HEARINGS
)
)
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_____)**

**SIERRA CLUB’S RESPONSE TO SOUTHWESTERN PUBLIC SERVICE COMPANY’S
SECOND SET OF INTERROGATORIES AND SECOND REQUEST FOR
PRODUCTION TO SIERRA CLUB**

Sierra Club hereby provides its responses and objections to Southwestern Public Service Company’s (“SPS’s” or the “Company’s”) Second Set of Interrogatories and Second Request for Production (hereinafter “Second RFI”) to Sierra Club.

I. GENERAL OBJECTIONS & RESPONSES

Sierra Club objects to SPS’s Second RFI insofar as the questions seek: (A) to impose more burdensome requirements for discovery than the applicable requirements of 16 Texas Administrative Code (“TAC”) Chapter 22, the Texas Rules of Civil Procedure, the Texas Administrative Procedure Act, Tex. Gov’t Code Ann. Chapter 2001, or Commission precedent; (B) disclosure of privileged communications and information pursuant to the attorney-client privilege or disclosure of communications and information protected from discovery under the attorney work product doctrine; or (C) information that has no tendency to make a fact more or

less probable than it would be without the evidence or that has no relevance to any fact is of consequence in determining the action.

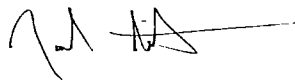
Subject to and without waiving these general objections, Sierra Club responds to SPS's Second RFI, expressly reserving all evidentiary and other objections concerning Sierra Club's responses and any related documents that SPS may seek to offer into evidence in this case. Sierra Club's responses are made in the spirit of cooperation without waiving Sierra Club's right to contest the admissibility of any of these matters at hearing. When Sierra Club provides certain information sought by the request while objecting to the provision of other information, it does so without prejudice to its objection in the interests of narrowing discovery disputes under 16 TAC § 22.144(d)(5). Pursuant to 16 TAC § 22.144(c)(2)(F), Sierra Club stipulates that its responses may be treated by all parties as if they were made under oath.

II. SPECIFIC RESPONSES

Sierra Club's written responses to SPS's Second RFI are attached and incorporated by reference. Each response is stated on or attached to a separate page on which the request has been restated. In accordance with 16 TAC § 22.144(c)(2)(A), Sierra Club states that Devi Glick was the preparer and is the sponsor of each response.

Dated: April 11, 2022

Respectfully submitted,



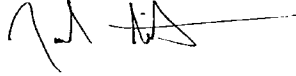
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Counsel for Sierra Club

CERTIFICATE OF SERVICE

I, Joshua Smith, certify that a copy of the foregoing Sierra Club submission was served upon all parties of record in this proceeding on April 11, 2022, by e-mail, as permitted by the presiding officer.



Joshua Smith
Sierra Club

SIERRA CLUB'S RESPONSES

SPS REQUEST NO. 2-1: Refer to page 49, lines 13 – 16 of Ms. Glick's Direct Testimony. Why did Ms. Glick and/or Synapse "not allow the model to build any new gas projects prior to 2030 in any scenarios"?

RESPONSE:

As a general matter, no gas prior to 2030 reflects Sierra Club's priorities and understandings of the potential of cost-effective clean energy going forward.

As an additional, case-specific matter, Synapse modeled a portfolio that is consistent with Xcel Energy's announced goal of providing 100% carbon-free electricity by 2050. With an assumed lifetime of 30 years, any gas plant built now will still have economic life remaining in 2050. Including new gas resources guarantees that the portfolio would either be incompatible with the Company's stated goal or would result in a stranded asset. As stated in testimony, new gas resources allowed after 2030 act only as placeholders for resources that will meet future firm capacity and energy needs.

SPS REQUEST NO. 2-2: Refer to page 49, lines 13 – 16 of Ms. Glick’s Direct Testimony. Did Ms. Glick (or anyone on her team from Synapse or otherwise) conduct any analysis that included new gas projects prior to 2030?

- a. If yes, please provide all the analysis (EnCompass files, Excel files, or information in any other format).
- b. If no, please explain why not.

RESPONSE:

No, Synapse did not conduct any modeling runs that allowed new gas projects prior to 2030 as part of this project.

- a. n/a
- b. See SC response to SPS RFI 2-1, above.

SPS REQUEST NO. 2-3: Refer to page 49, lines 13 – 16 of Ms. Glick’s Direct Testimony. Did Ms. Glick (or anyone on her team from Synapse or otherwise) conduct any analysis that included replacing Harrington unit 1 with new gas generation?

- a. If yes, please provide all the analysis (EnCompass files, Excel files, or information in any other format).
- b. If no, please explain why not.

RESPONSE:

No.

- a. n/a
- b. See SC response to SPS RFI 2-1, above.

SPS REQUEST NO. 2-4: Did Sierra Club conduct any analysis in which battery energy storage resources will receive less than 100% accreditation after Southwest Power Pool implements the effective load carrying capability methodology in 2023?

- a. If yes, please provide all the analysis (EnCompass files, Excel files, or information in any other format).
- b. If no, please explain why not.

RESPONSE:

No.

- a. n/a
- b. SPS set the Firm Capacity for stand-alone battery storage to 100%. Synapse sought to change as few things as possible in SPS's assumptions, and therefore made no changes to SPS's capacity credit assumptions for standalone battery storage.

SPS REQUEST NO. 2-5: Provide all workpapers and any other supporting analysis for all tables in Ms. Glick's direct testimony, whether those tables are the result of EnCompass modeling results or analysis conducted outside of EnCompass.

RESPONSE:

See the following Attachments:

- CONF Attachment_Historical Harrington CAPEX Comparison_Update
- CONF Attachment_Incremental Reductions in HAR Capital Expenditures
- CONF Attachment_New Generating Resources in ResourceAnnual
- CONF Attachment_Solar Wind LCOE Calculations
- Harrington SCR Estimate
- Planning vs Financial Forecast
- Synapse Harrington Battery Costs

SPS REQUEST NO. 2-6: Confirm that in response to SPS RFI 1-5, Sierra Club has provided SPS with all Synapse modeling files in relation to Harrington Generation Station since February 15, 2022. If deny, please provide any and all remaining Synapse modeling files.

RESPONSE:

Confirmed.

SPS REQUEST NO. 2-7: Confirm that in response to SPS RFI 1-5, Sierra Club has provided SPS with all modeling-related files, including any and all Excel files or other types of files created outside of EnCompass, in relation to Harrington Generation Station since February 15, 2022. If deny, please provide any and all remaining Synapse modeling files.

RESPONSE:

Confirmed.

The following files are not convertible:

Harrington SCR Estimate.xlsx
Planning vs Financial Forecast.xlsx
Synapse Harrington Battery Costs.xlsx

Please see the ZIP file for this Filing on the PUC Interchange in order to access these files.

Contact centralrecords@puc.texas.gov if you have any questions.