



## Filing Receipt

**Received - 2022-04-18 12:11:06 PM**  
**Control Number - 52485**  
**ItemNumber - 154**

**SOAH DOCKET NO. 473-22-1073  
PUC DOCKET NO. 52485**

<b>APPLICATION OF SOUTHWESTERN</b>	<b>§</b>	
<b>PUBLIC SERVICE COMPANY TO</b>	<b>§</b>	<b>BEFORE THE STATE OFFICE</b>
<b>AMEND ITS CERTIFICATE OF</b>	<b>§</b>	
<b>CONVENIENCE AND NECESSITY TO</b>	<b>§</b>	<b>OF</b>
<b>CONVERT HARRINGTON</b>	<b>§</b>	
<b>GENERATING STATION FROM COAL</b>	<b>§</b>	<b>ADMINISTRATIVE HEARINGS</b>
<b>TO NATURAL GAS</b>	<b>§</b>	

**ALLIANCE OF XCEL MUNICIPALITIES’  
FIFTH SET OF REQUESTS FOR INFORMATION TO  
SOUTHWESTERN PUBLIC SERVICE COMPANY**

Alliance of Xcel Municipalities’ (“AXM”) Fifth Set of Requests for Information ("RFIs") to Southwestern Public Service Company (“SPS”) is hereby filed in this docket. Responses to the RFIs set forth on Exhibit A should be served on Alfred R. Herrera, Herrera Law & Associates, PLLC at P.O. Box 302799, Austin, Texas 78703, within four (4) days of service hereof or no later than **April 22, 2022**. Exhibit A is attached hereto and incorporated herein for all purposes.

**Definitions**

1. “SPS,” the “Company,” and “Applicant” refer to Southwestern Public Service Company and its affiliates.
2. “You,” “yours,” and “your” refer to SPS (as defined above), including its directors, officers, employees, consultants, agents and attorneys.
3. “Document” and “documents” mean any written, recorded, filmed, or graphic matter, whether produced, reproduced, or on paper, cards, tapes, film, electronic facsimile, computer storage device of any other media, including, but not limited to, memoranda, notes, analyses, minutes, records, photographs, correspondence, telegrams, diaries, bookkeeping entries, financial statements, tax returns, checks, check stubs, reports, studies, charts, graphs, statements, notebooks, handwritten notes, applications, contracts, agreements, books, pamphlets, periodicals, appointment calendars, records and recordings of oral conversations, work papers, observations, commercial practice manuals, reports and summaries of interviews, reports of consultants, appraisals, forecasts, tape recordings, or any form of recording that is capable of being transcribed into written form.

4. The term “communication” includes all verbal and written communications (including written records of verbal communications) of every kind, including but not limited to, telephone calls, conferences, letters and all memoranda or other documents concerning the requested item. Where communications are not in writing, provide copies of all memoranda and documents and describe in full the substance of the communication to the extent that substance is not reflected in the memoranda and documents provided and to the extent it is within the knowledge of SPS.
5. “Identification” of a document includes stating (a) the nature of the document (e.g., letter, memorandum, corporate minutes), (b) the date, if any, appearing thereon, (c) the date, if known, on which the document was prepared, (d) the title of the document, (e) the general subject matter of the document, (f) the number of pages comprising the document, (g) the identity of each person who signed or initialed the document, (h) the identity of each person to whom the document was addressed, (i) the identity of each person who received the document or reviewed it, (j) the location of the document, and (k) the identity of each person having custody of, or control over, the document. Identification of a document includes identifying all documents known or believed to exist, whether or not in the custody of SPS or in the custody of its attorneys or other representatives or agents.
6. “Identification” of a person includes stating his or her full name, his or her most recent known business address and telephone number, his or her present position, and his or her prior connection or association with any party to this proceeding.
7. “Person” refers to, without limiting the generality of its meaning, every natural person, corporate entity, partnership, association (whether formally organized or ad hoc), joint venture, unit operation, cooperative, municipality, commission, governmental body or agency.
8. Capitalized terms not otherwise defined herein shall have the meaning attributed to them in the referenced testimony.

### **Instructions**

1. If any RFI appears confusing, please request clarification from the undersigned counsel.
2. In providing your responses, please start each response on a separate page and type, at the top of the page, the RFI that is being answered.
3. As part of the response to each RFI, please state, at the bottom of the answer, the name and job position of each person who participated in any way, other than providing clerical assistance, in the preparing of the answer. If the RFI has sub-parts, please identify the person or persons by sub-part. Please also state the name of the witness in this docket who will sponsor the

answer to the RFI and who can vouch for the truth of the answer. If the RFI has sub-parts, please identify the witness or witnesses by sub-part.

4. Rather than waiting to provide all of the responses at the same time, please provide individual responses as each becomes available.
5. If SPS considers any RFI to be unduly burdensome, or if the response would require the production of a voluminous amount of material, please call the undersigned counsel as soon as possible in order to discuss the situation and to try to resolve the problem. Likewise, if SPS objects to any of the RFIs on the grounds that the RFI seeks proprietary information, or on any other grounds, please call the undersigned counsel as soon as possible.
6. If any document is withheld under any claim of privilege, please furnish a list identifying each document for which a privilege is claimed, together with the following information: date, sender, recipients, recipients of copies, subject matter of the document, and the basis upon which such privilege is claimed.
7. These requests shall be deemed continuing so as to require further and supplemental responses if SPS receives or generates additional information within the scope of these requests between the time of the original response and the time of the hearings.

Respectfully submitted,

**HERRERA LAW & ASSOCIATES, PLLC**

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By: /s/ Alfred R. Herrera

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**ATTORNEYS FOR ALLIANCE OF XCEL  
MUNICIPALITIES**

**CERTIFICATE OF SERVICE**

I hereby certify that on this 18<sup>th</sup> day of April, 2022, a true and correct copy of the *Alliance of Xcel Municipalities' Fifth Set of RFIs to SPS* was served upon all parties of record via electronic mail, in accordance with the Order Suspending Rules, issued in Project No. 50664.

By: /s/ Leslie Lindsey  
Leslie Lindsey

**EXHIBIT A**

**SOAH DOCKET NO. 473-22-1073  
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- 5-1. Reference page 7, lines 11-16 of SPS witness Grant’s rebuttal testimony, please provide the assumed level (MW) and cost (\$/kW) of new combustion turbine capacity that results in the referenced \$500 million cost of constructing new combustion turbines at the Harrington site.
- 5-2. Reference page 11, lines 16-20 of SPS witness Grant’s rebuttal testimony, please confirm that SPS has not issued an RFP for replacement of the Harrington generating capacity. If deny, provide a copy of this RFP.
- 5-3. Reference page 11, lines 16-20 of SPS witness Grant’s rebuttal testimony, please confirm that SPS’s RFI does not mention the Harrington plant. If deny, provide a copy of the RFI and a cite the specific pages which reference the Harrington plant.
- 5-4. Reference page 11, lines 16-20 of SPS witness Grant’s rebuttal testimony, please confirm that SPS’s RFI indicates that the document is not an RFP but rather is a request for information to be used for a study of the Tolk Plant which was required by terms of a New Mexico rate case settlement agreement. If deny, provide a copy of the RFI and a cite the specific pages which state that the RFI is an RFP.
- 5-5. Please confirm that SPS’s RFI, as referenced on page 11 of Mr. Grant’s rebuttal testimony, does not indicate that it would allow bidders to propose new generating resources to be located at Harrington site or other existing SPS plant sites. If deny, provide documentation that supports such denial.
- 5-6. Reference page 14, line 12 through page 15, line 2 of SPS witness Grant’s rebuttal testimony and pages 17 of Mr. Norwood’s direct testimony, please confirm that Mr. Norwood’s direct testimony does not recommend that SPS replace Harrington with an entirely new more efficient gas-fired facility or a combined cycle facility. If deny, provide documentation that supports such denial.

- 5-7. Please confirm that the “Retire and Replace” alternative Mr. Norwood references on pages 15 and 17 of his direct testimony is Scenario 1 as evaluated by witness Elsey. If deny, provide documentation that supports such denial.
- 5-8. Please confirm that the “Retire and Replace” alternative (Scenario 1) evaluated by witness Elsey does not replace retired Harrington capacity entirely with new gas-fired combustion turbines. If deny, provide documentation that supports such denial.
- 5-9. Please confirm that the base case “Retire and Replace” alternative (Scenario 1) evaluated by witness Elsey assumes that SPS would add approximately 1100 MW (nameplate) of new wind and solar resources before the Harrington coal units are retired and would add a total of approximately 700 MW of new gas-fired combustion turbine peaking units over the years 2026, 2027 and 2028. If deny, provide documentation that supports such denial.
- 5-10. Please confirm that the “Retire and Replace” alternative (Scenario 1) evaluated by witness Elsey assumes that SPS would add new gas-fired combustion turbines in 2027, 2028 and 2029. If deny, provide documentation that supports such denial.
- 5-11. Please provide the cumulative NPV of assumed interconnection costs for new generating resources for each of the six scenarios and each sensitivity case evaluated by Mr. Elsey.
- 5-12. Please confirm that the NPV difference between Scenarios 1 and 2 are lower in sensitivity cases which assume higher natural gas prices.
- 5-13. Please confirm that Mr. Norwood’s direct testimony does not address or recommend that SPS should “mothball” one or more of the Harrington units. If deny, provide documentation that supports such denial.
- 5-14. Please provide the age of each existing gas-fired combustion turbines owned by SPS.
- 5-15. Please provide the estimate service life of new simple cycle combustion turbines that are included in each of the six scenarios evaluated by Mr. Elsey.
- 5-16. Please provide the forecasted capital cost (\$/kW) of new simple cycle combustion turbines that are included in each of the six scenarios evaluated by Mr. Elsey.
- 5-17. Please provide the forecasted in service year and capacity (MW) of each new simple cycle combustion turbine that are included in each of the six scenarios evaluated by Mr. Elsey.
- 5-18. Reference page 21, lines 3-14 of SPS witness Grant’s rebuttal testimony, please confirm that SPS could maintain its FERC interconnection rights at the Harrington plant by retiring and replacing the existing units with new generating resources. If deny, provide documentation that supports such denial.
- 5-19. Reference page 21, lines 12-14 of SPS witness Grant’s rebuttal testimony, please provide workpapers including calculations and assumptions supporting the claim that to go through the SPP generation interconnection process again could cost close to \$1 billion and identify

any other utility or IPP that has incurred that amount to acquire SPP generation interconnection rights.

- 5-20. Please describe Mr. Koujak's direct knowledge of the modeling performed in this case regarding Harrington conversion and replacement scenarios as sponsored by SPS witness Elsey and provide any analysis he conducted to independently confirm the reasonableness of modeling inputs and commodity prices.
- 5-21. Please describe Mr. Koujak's direct knowledge of the generation interconnection cost assumptions included in SPS's modeling of Harrington conversion and replacement scenarios as sponsored by SPS witness Elsey and provide any analysis he conducted to independently confirm the reasonableness of interconnection cost assumptions for each resource.
- 5-22. Please explain whether Mr. Koujak believes it is appropriate to rely upon non-binding information proposals provided in response to SPS's RFI for market information to support the Tolk study rather than binding bids received in response to a formal RFP for replacement alternatives to the Harrington conversion project as the basis for evaluating Harrington conversion alternatives.
- 5-23. Please explain whether Mr. Koujak normally recommends to clients that RFIs should be used rather than RFPs to obtain binding bids in determining the least cost alternatives for supplying utility generation capacity and energy requirements. If so, please provide any analysis, reports and testimony he has developed for clients within the last five calendar years that provide such recommendations.
- 5-24. Please confirm that SPS's Tolk RFI was not intended to obtain binding proposals for replacement of the Harrington coal units and does not even mention the Harrington plant. If deny, please explain and provide documentation to support the denial.
- 5-25. Please explain whether Mr. Koujak believes it is feasible for SPS or any utility to forecast production costs of a utility system such as SPS over a 20-year study period to within a margin of error of 3%. If so, please provide any analysis, reports and testimony he has developed within the last five calendar years to support this opinion.
- 5-26. Please explain whether Mr. Koujak believes it is appropriate to compare the cost of generating resource such as the converted Harrington units that have an estimated remaining service life of 10-15 years to the cost of a new generating resource that has an expected service life of 30 to 40 years without considering the additional benefits of the new resource due to its longer service life. If so, please explain in detail why this is appropriate. If not, explain why not.
- 5-27. Please indicate whether Mr. Koujak reviewed the interconnection cost assumptions for each resource included in the analyses of Harrington conversion alternatives presented in Mr. Elsey's testimony. If so, provide Mr. Koujak's assessment of the impact of these interconnection cost assumptions on the overall cost of each of the six scenarios evaluated by Mr. Elsey. If not, explain why not.



- 5-28. Please indicate whether Mr. Koujak reviewed the natural gas price assumptions for the base case, and low gas price and high gas price sensitivities in the analyses of Harrington conversion alternatives presented in Mr. Elsey's testimony. If so, provide Mr. Koujak's assessment of the reasonableness of these gas price assumptions and his understanding of their impact on the NPV results for each of the six scenarios evaluated by Mr. Elsey. If not, explain why not.
- 5-29. Please explain Mr. Koujak's direct knowledge and experience using the EnCompass model.
- 5-30. Please provide documentation of any analysis conducted or reviewed by Mr. Koujak to confirm that the SPS EnCompass model used for Mr. Elsey's analyses of Harrington conversion and replacement scenarios in this case is reasonably simulating operations and production costs of the SPS system.
- 5-31. Please confirm that the base case "Harrington Conversion" alternative (Scenario 2) evaluated by witness Elsey assumes that SPS would add approximately 850 MW of new wind and solar resources before the Harrington coal units are converted to burn gas and would add a total of approximately 700 MW of new gas-fired combustion turbine peaking units over the years 2028, 2029 and 2030. If deny, provide documentation that supports such denial.
- 5-32. Please confirm that the base case "Retire and Replace" alternative (Scenario 1) evaluated by witness Elsey assumes that SPS would add approximately 1100 MW more renewable energy capacity and approximately 700 MW more new gas-fired combustion turbine peaking capacity than is added in the Harrington Conversion case (Scenario 2) over the 2025-2030 period. If deny, provide documentation that supports such denial.