



Filing Receipt

Received - 2022-04-21 01:32:33 PM
Control Number - 52485
ItemNumber - 157

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

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

SOUTHWESTERN PUBLIC SERVICE COMPANY'S
ERRATA TO THE REBUTTAL TESTIMONY OF WILLIAM A. GRANT

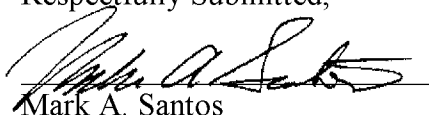
Southwestern Public Service Company ("SPS"), submits the following errata to the Rebuttal Testimony of William A. Grant.

The testimony should read:

- Page 18, line 4 "...Texas and New Mexico customers for over 40 years."

The corrected page is attached to this errata and will be served on the parties to this proceeding.

Respectfully Submitted,



Mark A. Santos

State Bar No. 24037433

Kate Norman

State Bar No. 24051121

C. Glenn Adkins

State Bar No. 24103097

COFFIN RENNER LLP

1011 West 31st Street

Austin, Texas 78705

(512) 879-0900

(512) 879-0912

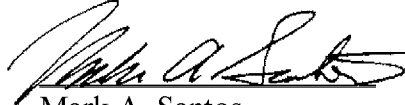
mark.santos@crtxlaw.com

kate.norman@crtxlaw.com

glenn.adkins@crtxlaw.com

CERTIFICATE OF SERVICE

I certify that, unless otherwise ordered by the presiding officer, notice of the filing of this document was provided to all parties of record via electronic mail on April 21, 2022, in accordance with the Order Suspending Rules, issued in Project No. 50664.



Mark A. Santos

1 **Q. Do you have any additional thoughts on Ms. Glick’s suggestion that SPS**
2 **should not receive full recovery for its investment in Harrington?**

3 A. Yes. Harrington has been delivering reliable and reasonably priced electricity to
4 Texas and New Mexico customers for over 40 years. However, Ms. Glick’s
5 recommendation would penalize SPS in contradiction of the Commission
6 actions to deny earlier recovery based on Harrington’s planned useful life and
7 extend SPS’s recovery period. This would also be despite the prior finding of
8 prudence of investment in the facility.

9 **Q. Is it valid to compare the Southwestern Electric Power Company case cited by**
10 **Ms. Glick as an example, in which a regulator has denied recovery of return**
11 **on investment, to the situation at Harrington?**

12 A. No. In the Southwestern Electric Power Company (“SWEPCO”) case, the plant at
13 issue – Dolet Hills Power Station – had not yet reached the end of its originally
14 predicted useful life. Because Dolet Hills Power Station was being retired early,
15 SWEPCO was seeking to shorten the depreciation rates/lives on the asset to end
16 earlier than had been the basis for the investment and original prudence
17 determination. Importantly, the Dolet Hills Power Station depreciation rates/lives
18 had never been extended in the manner that Harrington’s have. For comparison
19 purposes, the Harrington units were originally anticipated to operate for 35 years.
20 The plant has now been in operation for over 40 years and may reach 60 years of