



## Filing Receipt

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

<b>APPLICATION OF SOUTHWESTERN PUBLIC SERVICE COMPANY TO AMEND ITS CERTIFICATE OF CONVENIENCE AND NECESSITY TO CONVERT HARRINGTON GENERATING STATION FROM COAL TO NATURAL GAS</b>	<b>§ § § § § § §</b>	<b>BEFORE THE STATE OFFICE  OF  ADMINISTRATIVE HEARINGS</b>
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**SOUTHWESTERN PUBLIC SERVICE COMPANY'S  
RESPONSE TO SIERRA CLUB'S  
SIXTH REQUEST FOR INFORMATION  
QUESTION NOS. 6-1 THROUGH 6-10**

*(Filename: SPSRespSC6th.doc; Total Pages: 23)*

<b>I. WRITTEN RESPONSES .....</b>	<b>2</b>
<b>II. INSPECTIONS.....</b>	<b>3</b>
<b>RESPONSES .....</b>	<b>5</b>
<b>QUESTION NO. SIERRA CLUB 6-1: .....</b>	<b>5</b>
<b>QUESTION NO. SIERRA CLUB 6-2: .....</b>	<b>6</b>
<b>QUESTION NO. SIERRA CLUB 6-3: .....</b>	<b>7</b>
<b>QUESTION NO. SIERRA CLUB 6-4: .....</b>	<b>8</b>
<b>QUESTION NO. SIERRA CLUB 6-5: .....</b>	<b>9</b>
<b>QUESTION NO. SIERRA CLUB 6-6: .....</b>	<b>10</b>
<b>QUESTION NO. SIERRA CLUB 6-7: .....</b>	<b>11</b>
<b>QUESTION NO. SIERRA CLUB 6-8: .....</b>	<b>12</b>
<b>QUESTION NO. SIERRA CLUB 6-9: .....</b>	<b>13</b>
<b>QUESTION NO. SIERRA CLUB 6-10: .....</b>	<b>14</b>
<b>CERTIFICATE OF SERVICE .....</b>	<b>15</b>

**EXHIBITS ATTACHED:**

Exhibit SPS-SC 6-6(a) (V)(USB)(CONF) ( <i>native format.xlsx</i> ).....	16
Exhibit SPS-SC 6-8 ( <i>non-native format</i> ) .....	17

**SOAH DOCKET NO. 473-22-1073  
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>	

**SOUTHWESTERN PUBLIC SERVICE COMPANY’S  
RESPONSE TO SIERRA CLUB’S  
SIXTH REQUEST FOR INFORMATION  
QUESTION NOS. 6-1 THROUGH 6-10**

Southwestern Public Service Company (“SPS”) files this response to the Sierra Club’s Sixth Request for Information, Question Nos. 6-1 through 6-10. SPS has provided notice, by email, to all parties that SPS’s Responses to Sierra Club’s Sixth Request for Information and accompanying exhibits (excluding voluminous and exhibits provided pursuant to the protective order) have been filed with the Commission and are available for download from the Commission’s Interchange website.

**I. WRITTEN RESPONSES**

SPS’s written responses to Sierra Club’s Sixth Request for Information are attached and incorporated by reference. Each response is stated on or attached to a separate page on which the request has been restated. SPS’s responses are made in the spirit of cooperation without waiving SPS’s right to contest the admissibility of any of these matters at hearing. In accordance with 16 Tex. Admin. Code § 22.144(c)(2)(A) (“TAC”), each response lists the preparer or person under whose direct supervision the response was prepared and any sponsoring witness. When SPS 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), SPS stipulates that its responses may be treated by all parties as if they were made under oath.

## **II. INSPECTIONS.**

If responsive documents are more than 100 pages but less than eight linear feet in length, the response will indicate that the attachment is voluminous (“(V)”) and, pursuant to 16 TAC § 22.144(h)(2), the exhibit will be made available for inspection at SPS’s voluminous room at 919 Congress Avenue, Suite 900, Austin, Texas 78701; telephone number (512) 721-2700.

If a response or the responsive documents are provided pursuant to the protective order in this docket, the response will indicate that it or the attachment is either Confidential (“CONF”) or Highly Sensitive (“HS”) as appropriate under the protective order. Access to Confidential and Highly Sensitive materials will be available on Coffin Renner’s file sharing link to all parties that have signed and filed the certification under the protective order entered in this docket. Confidential and Highly Sensitive responsive documents will also be made available for inspection at SPS’s voluminous room, unless they form a part of a response that exceeds eight linear feet in length; then they will be available at their usual repository in accordance with the following paragraph. Please call in advance for an appointment to ensure that there is sufficient space to accommodate your inspection.

If responsive documents exceed eight linear feet in length, the response will indicate that the attachment is subject to the FREIGHT CAR DOCTRINE, and, pursuant to 16 TAC § 22.144(h)(3), the attachment will be available for inspection at its usual repository, SPS's offices in Austin, Texas, unless otherwise indicated. SPS requests that parties wishing to inspect this material provide at least 48-hour notice of their intent by contacting Stephanie Tanner at Coffin Renner L.L.P. PC, 1011 West 31st Street, Austin, Texas 78705; telephone number (512) 879-0900; facsimile transmission number (512) 879-0912; email address [stephanie.tanner@crtxlaw.com](mailto:stephanie.tanner@crtxlaw.com). Inspections will be scheduled to accommodate all requests with as little inconvenience to the requesting party and to SPS's operations as possible.

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Respectfully submitted,



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ATTORNEYS FOR  
SOUTHWESTERN PUBLIC SERVICE COMPANY

## **RESPONSES**

### **QUESTION NO. Sierra Club 6-1:**

Refer to the rebuttal testimony of SPS Witness Elsey, pages 13, lines 1- page 14 lines 10 regarding the EnCompass model's selection of new CTGs beyond 2030 in Ms. Glick's modeling. Does SPS believe that the need for firm capacity more than years from now justifies continuing to operate the Harrington units today?

### **RESPONSE:**

No. SPS believes it is implausible for Sierra Club to rely upon the cost and operational benefits of new gas generation in its modeling beyond 2030 to justify denial of converting Harrington Unit 1 to gas in the near-term.

Preparer: Ben R. Elsey

Sponsor: Ben R. Elsey

**QUESTION NO. Sierra Club 6-2:**

Have any SPS witnesses filing testimony in this case ever filed errata testimony in any proceeding before the Texas Public Utility Commission or the New Mexico Public Regulatory Commission? If yes, identify all witnesses and the dockets in which SPS witnesses have filed errata testimony.

**RESPONSE:**

To SPS's knowledge, Anastacia Santos and Ben Elsey have never filed errata testimony in any proceeding before the Texas Public Utility Commission or the New Mexico Public Regulatory Commission. It is possible that errata testimony has been filed in other proceedings for other SPS witnesses. However, SPS has not conducted an analysis to determine which dockets those errata changes might have been filed in. SPS also considers errata changes to be related to typographical errors, not substantive errors, such as those contained in Ms. Glick's New Mexico testimony related to the Harrington conversion

Preparer:       Anastacia Santos  
Sponsors:      Anastacia Santos

**QUESTION NO. Sierra Club 6-3:**

Refer to the rebuttal testimony of SPS Witness Elsey, page 30 regarding SPP's assignment of transmission network upgrade costs. State whether SPS has any role or responsibility with regards to any planning or decisions made by SPP. If yes, describe these responsibilities.

**RESPONSE:**

SPS's involvement in planning at the Southwest Power Pool is discussed SPS's response to Sierra Club 5-3.

Preparer: William A. Grant  
Sponsor: William A. Grant

**QUESTION NO. Sierra Club 6-4:**

Refer to the rebuttal testimony of SPS Witness Elsey, page 44 regarding SPS's prior estimates for the cost of short-term capacity. Explain the source of basis of this assumption and provide all workpapers showing how these costs were calculated.

**RESPONSE:**

To estimate the cost of short-term capacity, Mr. Elsey was relying upon his knowledge of the cost of capacity of a relatively recent bilateral agreement. SPS does not have any further workpapers.

It is worth noting that as other utilities continue to retire thermal generation, the amount of capacity available to purchase is likely to decline, which will cause costs to increase. This was demonstrated in MISO's recent Planning Resource Auction in which the price of capacity reached \$233.66/MW per day in some areas.

Preparer: Ben R. Elsey  
Sponsor: Ben R. Elsey

**QUESTION NO. Sierra Club 6-5:**

Refer to the rebuttal testimony of SPS Witness Elsey, page 45 regarding PNM's retirement of San Juan and the statement that PNM has warned customers of rotating outages this summer. Is Mr. Elsey aware that the Commission approved the use of San Juan for the summer of 2022? If yes, why was this fact omitted from his testimony.

**RESPONSE:**

Yes.

Mr. Elsey was using PNM's San Juan retirement to highlight the risk to system reliability of retiring 1,050MW of firm and dispatchable capacity and the company not being able to meet its planning reserve margin requirements. The NMPRC decision to approve the use of San Juan for the summer of 2022 is a unique solution to PNM's reliability problems.

Preparer: Ben R. Elsey

Sponsor: Ben R. Elsey

**QUESTION NO. Sierra Club 6-6:**

Refer to the rebuttal testimony of SPS Witness Elsey, page 50 regarding SPS's updated modeling.

- a. Provide all workpapers supporting the updated modeling without 1,000 MW of wind co-located.
- b. Explain why SPS did not model its system without the 1,000 MW of wind co-located with Harrington in its original model runs?

**RESPONSE:**

- a. Please refer to Exhibit SPS-SC 6-6(a)(V)(CONF)(USB).
- b. As described in the rebuttal testimony of Mr. Ben R. Elsey, SPS's Harrington analysis intentionally favored the early retirement of the Harrington Units. This included allowing 1,000MW of new wind to be co-located at Harrington.

Preparer: Ben R. Elsey  
Sponsor: Ben R. Elsey

**QUESTION NO. Sierra Club 6-7:**

Refer to the rebuttal testimony of SPS Witness Grant, page 10. Please indicate where in her direct testimony Ms. Glick quotes SPS response 5-3.

**RESPONSE:**

Ms. Glick's testimony cites SPS's response to Sierra Club RFI 5-3 on page 25 at footnote 26. The footnote states that Sierra Club RFI 5-3 is included in Exhibit DG-2 attached to Ms. Glick's testimony. Mr. Grant's testimony points out that her reference to Sierra Club RFI 5-3 fails to acknowledge certain information provided to the Sierra Club in that response and thereby mischaracterizes the role that SPS has in the Southwest Power Pool Transmission Working Group.

Preparer: William A. Grant  
Sponsor: William A. Grant

**QUESTION NO. Sierra Club 6-8:**

Refer to the rebuttal testimony of SPS Witness Grant, page 17.

- a. Provide all workpapers supporting the analysis supporting \$388.7 Million.
- b. Provide all workpapers supporting the table at the bottom of page 17.
- c. Explain whether the \$388.7 million calculated in the text and \$385.7 million in the table are supposed to represent the same number.
- d. Explain what cost are included in the \$92.4 million in the table at the bottom of page 17.

**RESPONSE:**

- a. Please refer to Exhibit SPS-SC 6-8.
- b. Please refer to Exhibit SPS-SC 6-8.
- c. The difference between the \$388.7 million and the \$385.7 million is that the \$388.7 does not include the RNU (Revenue Neutrality Uplift) and admin fees.
- d. The \$92.4 million is the real time fuel and startup and ancillary service fees charged to the unit providing the energy to the market.

Preparer: William A. Grant

Sponsor: William A. Grant

**QUESTION NO. Sierra Club 6-9:**

Refer to the rebuttal testimony of SPS Witness Koujak, pages 9-10 regarding the construction and retrofitting process for Harrington. State the time required to complete the straight-forward process to convert one unit to operate on gas, if the pipeline has already been installed.

**RESPONSE:**

Refer to Mr. Lytal's direct testimony on Page 10 and 11 for the expected project timeline. Conversion of one unit directly from coal-to-gas will take approximately 10 to 12 weeks with a corresponding unit outage of approximately six to eight weeks.

SPS has not estimated the schedule duration to convert one unit from a mothballed state. The duration would likely be weeks to months longer than a direct coal-to-gas conversion.

Preparer: Brian Hudson  
Sponsor: Mark Lytal

**QUESTION NO. Sierra Club 6-10:**

Refer to the rebuttal testimony of SPS Witness Lytal, page10 regarding the mothballing of Harrington. Provide the estimated cost of mothballing Harrington Unit 1 with all associated analysis and workpapers.

**RESPONSE:**

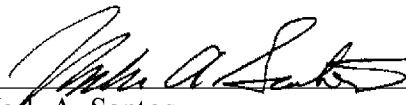
SPS does not have an estimate for mothballing Harrington 1. SPS has never estimated the cost of mothballing one of its units and has never mothballed a unit of any significant size.

Preparer: Mark Lytal

Sponsor: Mark Lytal

### **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 26, 2022, in accordance with the Order Suspending Rules, issued in Project No. 50664.

  
\_\_\_\_\_  
Mark A. Santos

**D52485 TX Harrington CCN**

**APPLICATION OF SOUTHWESTERN  
PUBLIC SERVICE COMPANY TO AMEND  
ITS CERTIFICATE OF CONVENIENCE AND  
NECESSITY TO CONVERT HARRINGTON  
GENERATING STATION FROM COAL  
TO NATURAL GAS**

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**EXHIBIT SPS-SC 6-6(a)(V)(CONF)(USB)**

PositionName	Year	Month	DART P&L (\$)	DA En Rev (\$)	RT En Rev (\$)	DART En Rev (\$)	DA En (MWh)
SPS.HARRNGTN1	2021	Jan	\$986,228	\$3,846,413	(\$326,804)	\$3,519,609	153004.4
SPS.HARRNGTN1	2021	Feb	\$100,142,238	\$105,923,250	(\$2,666,508)	\$103,256,742	164962.8
SPS.HARRNGTN1	2021	Mar	\$331,797	\$2,112,435	(\$172,176)	\$1,940,258	86887
SPS.HARRNGTN1	2021	Apr	\$876,124	\$4,057,549	(\$696,474)	\$3,361,075	139862.7
SPS.HARRNGTN1	2021	May	\$371,746	\$1,673,793	\$175,487	\$1,849,280	67055.9
SPS.HARRNGTN1	2021	Jun	\$2,242,487	\$5,777,611	(\$119,005)	\$5,658,605	186376.4
SPS.HARRNGTN1	2021	Jul	\$2,907,411	\$6,387,069	(\$508,980)	\$5,878,089	166824.6
SPS.HARRNGTN1	2021	Aug	\$3,161,429	\$6,959,759	(\$232,295)	\$6,727,464	190701.7
SPS.HARRNGTN1	2021	Sep	\$2,294,642	\$5,657,039	(\$434,612)	\$5,222,427	154890.8
SPS.HARRNGTN1	2021	Oct	\$3,162,298	\$6,231,564	(\$478,976)	\$5,752,588	140354
SPS.HARRNGTN1	2021	Nov	\$3,192,892	\$5,856,365	(\$165,210)	\$5,691,155	133581.9
SPS.HARRNGTN1	2021	Dec	\$1,001,617	\$4,017,357	(\$464,855)	\$3,552,502	123731.6
SPS.HARRNGTN2	2021	Jan	\$1,010,207	\$3,892,852	(\$333,814)	\$3,559,037	159499.8
SPS.HARRNGTN2	2021	Feb	\$110,554,288	\$113,876,224	(\$422,374)	\$113,453,849	156851.3
SPS.HARRNGTN2	2021	Mar	\$644,773	\$2,646,242	(\$71,144)	\$2,575,098	114408.3
SPS.HARRNGTN2	2021	Apr	\$368,279	\$1,874,670	(\$253,091)	\$1,621,578	77250.7
SPS.HARRNGTN2	2021	May	\$882,591	\$3,693,925	(\$113,279)	\$3,580,647	156955.9
SPS.HARRNGTN2	2021	Jun	\$2,515,676	\$5,977,439	(\$164,540)	\$5,812,900	194081.6
SPS.HARRNGTN2	2021	Jul	\$2,874,799	\$5,960,514	(\$449,368)	\$5,511,146	158276
SPS.HARRNGTN2	2021	Aug	\$2,946,191	\$6,221,763	(\$154,164)	\$6,067,599	182082.2
SPS.HARRNGTN2	2021	Sep	\$2,794,773	\$5,933,722	(\$276,132)	\$5,657,590	172073.6
SPS.HARRNGTN2	2021	Oct	\$3,733,190	\$6,733,562	(\$645,057)	\$6,088,505	157703.7
SPS.HARRNGTN2	2021	Nov	\$3,214,056	\$6,927,756	(\$986,270)	\$5,941,486	170851.2
SPS.HARRNGTN2	2021	Dec	\$1,063,329	\$4,393,945	(\$1,133,844)	\$3,260,101	142101.5
SPS.HARRNGTN3	2021	Jan	\$1,335,435	\$4,477,213	(\$323,151)	\$4,154,061	188418.4
SPS.HARRNGTN3	2021	Feb	\$114,770,958	\$118,883,429	(\$1,149,807)	\$117,733,622	195627
SPS.HARRNGTN3	2021	Mar	\$559,245	\$2,704,014	(\$6,088)	\$2,697,926	127224
SPS.HARRNGTN3	2021	Apr	\$1,674,842	\$4,595,897	(\$449,054)	\$4,146,844	165716.3
SPS.HARRNGTN3	2021	May	\$1,199,448	\$3,313,056	(\$131,742)	\$3,181,315	129357.3
SPS.HARRNGTN3	2021	Jun	\$2,631,070	\$5,989,065	(\$111,410)	\$5,877,655	194868.1
SPS.HARRNGTN3	2021	Jul	\$4,186,638	\$8,428,345	(\$487,380)	\$7,940,965	233559.7
SPS.HARRNGTN3	2021	Aug	\$3,276,945	\$6,614,382	(\$105,393)	\$6,508,988	192634.6
SPS.HARRNGTN3	2021	Sep	\$2,445,097	\$5,907,550	(\$752,107)	\$5,155,443	169744.1
SPS.HARRNGTN3	2021	Oct	\$377,655	\$667,464	(\$40,218)	\$627,246	14507.6
SPS.HARRNGTN3	2021	Nov	\$0	\$0	\$0	\$0	0
SPS.HARRNGTN3	2021	Dec	(\$45,670)	\$0	(\$4,102)	(\$4,102)	0
			<b>\$385,684,727</b>	<b>\$488,213,232</b>	<b>(\$14,653,940)</b>	<b>\$473,559,292</b>	<b>5162026.7</b>

P&L without RNU + Admin Fees      **\$388,744,286**

PositionName	Year	Month	DA En 5m (MWh)	RT Meter (MWh)	RT SetPoint (MWh)	DA LMP (\$/MWh)	RT LMP (\$/MWh)
SPS.HARRNGTN1	2021	Jan	153004.4	141756.9995	0	\$21.43	\$20.35
SPS.HARRNGTN1	2021	Feb	164962.8	146733.0015	0	\$514.20	\$194.59
SPS.HARRNGTN1	2021	Mar	86887	85621.00267	0	\$18.58	\$17.84
SPS.HARRNGTN1	2021	Apr	139862.7	135239.9986	0	\$22.30	\$25.01
SPS.HARRNGTN1	2021	May	67055.9	76411.00425	0	\$21.32	\$21.10
SPS.HARRNGTN1	2021	Jun	186376.4	180726.0006	0	\$26.42	\$26.06
SPS.HARRNGTN1	2021	Jul	166824.6	151537.9971	0	\$34.94	\$34.66
SPS.HARRNGTN1	2021	Aug	190701.7	185563.994	0	\$31.98	\$28.33
SPS.HARRNGTN1	2021	Sep	154890.8	151235.9986	0	\$27.20	\$18.69
SPS.HARRNGTN1	2021	Oct	140354	147987.9998	0	\$27.84	\$22.96
SPS.HARRNGTN1	2021	Nov	133581.9	132406.001	0	\$32.90	\$30.80
SPS.HARRNGTN1	2021	Dec	123731.6	127596.0003	0	\$21.43	\$15.83
SPS.HARRNGTN2	2021	Jan	159499.8	150957.9978	0	\$20.82	\$20.35
SPS.HARRNGTN2	2021	Feb	156851.3	132427.9971	0	\$566.83	\$194.59
SPS.HARRNGTN2	2021	Mar	114408.3	113207.0022	0	\$17.81	\$17.83
SPS.HARRNGTN2	2021	Apr	77250.7	71920.00117	0	\$17.73	\$25.01
SPS.HARRNGTN2	2021	May	156955.9	160081.9997	0	\$20.21	\$21.10
SPS.HARRNGTN2	2021	Jun	194081.6	180574.0004	0	\$26.42	\$26.06
SPS.HARRNGTN2	2021	Jul	158276	142273.001	0	\$35.97	\$34.66
SPS.HARRNGTN2	2021	Aug	182082.2	171599.9991	0	\$30.49	\$28.33
SPS.HARRNGTN2	2021	Sep	172073.6	161463.0011	0	\$25.99	\$18.69
SPS.HARRNGTN2	2021	Oct	157703.7	151119.0025	0	\$28.72	\$23.07
SPS.HARRNGTN2	2021	Nov	170851.2	153245.9989	0	\$30.37	\$30.80
SPS.HARRNGTN2	2021	Dec	142101.5	139138.0008	0	\$20.49	\$15.83
SPS.HARRNGTN3	2021	Jan	188418.4	172596.0065	0	\$21.12	\$20.35
SPS.HARRNGTN3	2021	Feb	195627	172097.0037	0	\$514.20	\$194.59
SPS.HARRNGTN3	2021	Mar	127224	131432.0028	0	\$15.69	\$17.83
SPS.HARRNGTN3	2021	Apr	165716.3	160565.0014	0	\$21.71	\$25.01
SPS.HARRNGTN3	2021	May	129357.3	115843.9996	0	\$20.60	\$21.10
SPS.HARRNGTN3	2021	Jun	194868.1	181777.9998	0	\$26.42	\$26.06
SPS.HARRNGTN3	2021	Jul	233559.7	211073.0021	0	\$34.32	\$34.66
SPS.HARRNGTN3	2021	Aug	192634.6	181501.9996	0	\$31.25	\$28.33
SPS.HARRNGTN3	2021	Sep	169744.1	155237.0002	0	\$26.23	\$18.69
SPS.HARRNGTN3	2021	Oct	14507.6	13607.99825	0	\$23.13	\$23.09
SPS.HARRNGTN3	2021	Nov	0	0	0	\$36.84	\$30.80
SPS.HARRNGTN3	2021	Dec	0	735.9995833	0	\$13.84	\$15.83
			<b>5162026.7</b>	<b>4887292.013</b>	<b>0</b>	<b>\$69.41</b>	<b>\$36.88</b>

P&L without RNU + Admin Fees      **\$388,744,286**

PositionName	Year	Month	DA Tot Rev (\$)	RT AS Rev (\$)	RUC MWP (\$)	RT OOM (\$)	Reg Adjust (\$)
SPS.HARRNGTN1	2021	Jan	\$3,930,165	\$57,418	\$24,777	\$333	\$9,696
SPS.HARRNGTN1	2021	Feb	\$105,992,800	\$207,549	\$0	\$96,777	\$1,163
SPS.HARRNGTN1	2021	Mar	\$2,165,264	\$3,177	\$34,970	\$8	\$3,421
SPS.HARRNGTN1	2021	Apr	\$4,147,523	\$17,446	\$70,012	\$4,554	\$10,141
SPS.HARRNGTN1	2021	May	\$1,746,207	(\$25,203)	\$3,769	\$5,784	\$2,573
SPS.HARRNGTN1	2021	Jun	\$5,835,322	\$17,844	\$35,944	\$1,380	\$2,444
SPS.HARRNGTN1	2021	Jul	\$6,429,261	\$6,991	\$3,380	\$2,657	\$6,564
SPS.HARRNGTN1	2021	Aug	\$7,044,821	(\$7,192)	\$0	\$1,389	\$5,133
SPS.HARRNGTN1	2021	Sep	\$5,789,149	(\$25,360)	\$0	\$22,077	\$7,888
SPS.HARRNGTN1	2021	Oct	\$6,352,925	\$93,204	\$183,038	\$3,207	\$14,767
SPS.HARRNGTN1	2021	Nov	\$5,921,456	\$38,554	\$109,035	\$14,079	\$5,095
SPS.HARRNGTN1	2021	Dec	\$4,090,242	\$55,264	\$122,980	\$2,439	\$6,464
SPS.HARRNGTN2	2021	Jan	\$4,038,440	\$18,128	\$106,614	\$1,155	\$6,564
SPS.HARRNGTN2	2021	Feb	\$113,965,825	\$17,589	\$35,162	\$5,240	\$59,119
SPS.HARRNGTN2	2021	Mar	\$2,837,550	(\$1,801)	\$75,258	\$7,812	\$4,524
SPS.HARRNGTN2	2021	Apr	\$1,967,649	\$4,429	\$34,972	\$935	\$3,993
SPS.HARRNGTN2	2021	May	\$3,860,754	\$3,591	\$187,637	\$11,788	\$16,747
SPS.HARRNGTN2	2021	Jun	\$6,102,169	(\$6,671)	\$0	\$3,003	\$9,984
SPS.HARRNGTN2	2021	Jul	\$6,017,846	(\$1,141)	\$0	\$3,084	\$8,462
SPS.HARRNGTN2	2021	Aug	\$6,385,598	(\$10,898)	\$0	\$3,541	\$7,629
SPS.HARRNGTN2	2021	Sep	\$6,179,468	(\$76,133)	\$89,229	\$28,955	\$14,051
SPS.HARRNGTN2	2021	Oct	\$6,991,565	\$48,272	\$274,005	\$4,784	\$22,450
SPS.HARRNGTN2	2021	Nov	\$7,124,015	(\$31,554)	\$134,877	\$6,531	\$17,996
SPS.HARRNGTN2	2021	Dec	\$4,551,603	\$184,454	\$423,131	\$1,273	\$22,039
SPS.HARRNGTN3	2021	Jan	\$4,689,145	\$14,402	\$67,184	\$857	\$9,201
SPS.HARRNGTN3	2021	Feb	\$119,026,433	\$37,559	\$34,451	\$269,966	\$56,639
SPS.HARRNGTN3	2021	Mar	\$2,913,223	\$17,551	\$105,969	\$7,959	\$8,590
SPS.HARRNGTN3	2021	Apr	\$4,787,599	\$37,593	\$285,199	\$2,537	\$26,451
SPS.HARRNGTN3	2021	May	\$3,509,547	(\$25,110)	\$39,975	\$2,018	\$14,106
SPS.HARRNGTN3	2021	Jun	\$6,114,620	(\$15,241)	\$4,059	\$3,390	\$7,524
SPS.HARRNGTN3	2021	Jul	\$8,540,220	\$2,049	\$0	\$3,758	\$16,887
SPS.HARRNGTN3	2021	Aug	\$6,781,818	(\$16,725)	\$0	\$3,350	\$10,045
SPS.HARRNGTN3	2021	Sep	\$6,137,897	(\$94,090)	\$108,424	\$33,209	\$15,949
SPS.HARRNGTN3	2021	Oct	\$667,484	\$2,833	\$0	\$0	\$917
SPS.HARRNGTN3	2021	Nov	\$0	\$0	\$0	\$0	\$0
SPS.HARRNGTN3	2021	Dec	\$0	\$0	\$0	\$0	\$0
			<b>\$492,635,603</b>	<b>\$548,777</b>	<b>\$2,594,051</b>	<b>\$559,831</b>	<b>\$435,213</b>

P&L without RNU + Admin Fees      **\$388,744,286**

PositionName	Year	Month	RT RNU (\$)	OCL Rebate (\$)	RUC Penalty (\$)	Reg NonPerf Penalty (\$)	CRDF Penalty (\$)
SPS.HARRNGTN1	2021	Jan	(\$9,023)	\$0	(\$4,985)	\$0	(\$7,340)
SPS.HARRNGTN1	2021	Feb	(\$349,700)	\$0	(\$359,265)	\$0	(\$7,461)
SPS.HARRNGTN1	2021	Mar	(\$7,461)	\$0	(\$9,937)	\$0	(\$1,514)
SPS.HARRNGTN1	2021	Apr	(\$29,809)	\$0	(\$2,473)	\$0	(\$972)
SPS.HARRNGTN1	2021	May	(\$8,015)	\$0	(\$1,831)	\$0	(\$83)
SPS.HARRNGTN1	2021	Jun	(\$46,653)	\$0	(\$12,019)	\$0	(\$1,824)
SPS.HARRNGTN1	2021	Jul	(\$17,963)	\$0	(\$63,253)	\$0	(\$15,692)
SPS.HARRNGTN1	2021	Aug	(\$42,043)	\$0	(\$15,615)	\$0	(\$1,354)
SPS.HARRNGTN1	2021	Sep	(\$69,555)	\$0	(\$3,772)	\$0	(\$1,047)
SPS.HARRNGTN1	2021	Oct	(\$48,206)	\$0	(\$5,239)	(\$110)	(\$648)
SPS.HARRNGTN1	2021	Nov	(\$49,717)	\$0	(\$24,692)	\$0	(\$3,527)
SPS.HARRNGTN1	2021	Dec	(\$129,018)	\$0	(\$1,564)	(\$51)	(\$1,397)
SPS.HARRNGTN2	2021	Jan	(\$10,757)	\$0	(\$594)	\$0	\$0
SPS.HARRNGTN2	2021	Feb	(\$346,324)	\$0	(\$250,538)	\$0	\$0
SPS.HARRNGTN2	2021	Mar	(\$12,246)	\$0	(\$5,069)	\$0	\$0
SPS.HARRNGTN2	2021	Apr	(\$3,780)	\$0	(\$2,541)	\$0	\$0
SPS.HARRNGTN2	2021	May	(\$35,385)	\$0	(\$3,163)	\$0	\$0
SPS.HARRNGTN2	2021	Jun	(\$45,127)	\$0	(\$5,891)	(\$11)	\$0
SPS.HARRNGTN2	2021	Jul	(\$17,580)	\$0	(\$14,019)	(\$23)	\$0
SPS.HARRNGTN2	2021	Aug	(\$38,017)	\$0	(\$1,312)	(\$15)	\$0
SPS.HARRNGTN2	2021	Sep	(\$81,472)	\$0	(\$1,484)	\$0	\$0
SPS.HARRNGTN2	2021	Oct	(\$44,355)	\$0	(\$4,046)	(\$31)	\$0
SPS.HARRNGTN2	2021	Nov	(\$59,840)	\$0	(\$9,746)	\$0	\$0
SPS.HARRNGTN2	2021	Dec	(\$150,923)	\$0	(\$1,791)	(\$72)	\$0
SPS.HARRNGTN3	2021	Jan	(\$13,295)	\$0	(\$1,432)	\$0	\$0
SPS.HARRNGTN3	2021	Feb	(\$347,263)	\$0	(\$63,188)	\$0	\$0
SPS.HARRNGTN3	2021	Mar	(\$15,067)	\$0	(\$3,575)	(\$70)	\$0
SPS.HARRNGTN3	2021	Apr	(\$43,651)	\$0	(\$51)	\$0	\$0
SPS.HARRNGTN3	2021	May	(\$23,105)	\$0	(\$949)	\$0	\$0
SPS.HARRNGTN3	2021	Jun	(\$46,048)	\$0	(\$3,403)	\$0	\$0
SPS.HARRNGTN3	2021	Jul	(\$28,533)	\$0	(\$4,190)	(\$3)	\$0
SPS.HARRNGTN3	2021	Aug	(\$42,413)	\$0	(\$4,120)	(\$84)	\$0
SPS.HARRNGTN3	2021	Sep	(\$76,052)	\$0	(\$14,756)	(\$74)	\$0
SPS.HARRNGTN3	2021	Oct	(\$3,116)	\$0	(\$281)	\$0	\$0
SPS.HARRNGTN3	2021	Nov	\$0	\$0	\$0	\$0	\$0
SPS.HARRNGTN3	2021	Dec	(\$731)	\$0	(\$761)	\$0	\$0
			<b>(\$2,292,242)</b>	<b>\$0</b>	<b>(\$901,546)</b>	<b>(\$545)</b>	<b>(\$42,858)</b>

P&L without RNU + Admin Fees      **\$388,744,286**

PositionName	Year	Month	Admin Services (\$)	RT Tot Rev (\$)	DART Rev (\$)	RT Startup Cost (\$)	RT EN Cost (\$)
SPS.HARRNGTN1	2021	Jan	(\$22,256)	(\$278,184)	\$3,651,981	\$26,900	\$2,638,852
SPS.HARRNGTN1	2021	Feb	(\$23,037)	(\$3,100,482)	\$102,892,318	\$13,528	\$2,736,552
SPS.HARRNGTN1	2021	Mar	(\$13,442)	(\$162,955)	\$2,002,309	\$45,236	\$1,625,277
SPS.HARRNGTN1	2021	Apr	(\$21,233)	(\$648,808)	\$3,498,714	\$43,741	\$2,578,849
SPS.HARRNGTN1	2021	May	(\$11,997)	\$140,483	\$1,886,690	\$46,478	\$1,468,466
SPS.HARRNGTN1	2021	Jun	(\$28,375)	(\$150,264)	\$5,685,057	\$28,975	\$3,413,596
SPS.HARRNGTN1	2021	Jul	(\$23,792)	(\$610,087)	\$5,819,174	\$27,178	\$2,884,585
SPS.HARRNGTN1	2021	Aug	(\$29,134)	(\$321,111)	\$6,723,710	\$8,582	\$3,553,698
SPS.HARRNGTN1	2021	Sep	(\$23,745)	(\$528,126)	\$5,261,023	\$63,170	\$2,903,211
SPS.HARRNGTN1	2021	Oct	(\$23,235)	(\$262,198)	\$6,090,727	\$67,682	\$2,860,746
SPS.HARRNGTN1	2021	Nov	(\$20,788)	(\$97,171)	\$5,824,286	\$66,471	\$2,564,922
SPS.HARRNGTN1	2021	Dec	(\$20,033)	(\$429,771)	\$3,660,472	\$89,757	\$2,569,097
SPS.HARRNGTN2	2021	Jan	(\$23,701)	(\$236,405)	\$3,802,035	\$34,764	\$2,757,064
SPS.HARRNGTN2	2021	Feb	(\$20,791)	(\$922,918)	\$113,042,907	\$76,576	\$2,412,044
SPS.HARRNGTN2	2021	Mar	(\$17,774)	(\$20,441)	\$2,817,109	\$52,395	\$2,119,940
SPS.HARRNGTN2	2021	Apr	(\$11,292)	(\$226,373)	\$1,741,275	\$23,859	\$1,349,138
SPS.HARRNGTN2	2021	May	(\$25,133)	\$42,803	\$3,903,557	\$7,339	\$3,013,208
SPS.HARRNGTN2	2021	Jun	(\$28,350)	(\$237,603)	\$5,864,567	\$15,257	\$3,333,633
SPS.HARRNGTN2	2021	Jul	(\$22,337)	(\$492,920)	\$5,524,926	\$13,460	\$2,636,666
SPS.HARRNGTN2	2021	Aug	(\$26,942)	(\$220,178)	\$6,165,420	\$10,072	\$3,209,156
SPS.HARRNGTN2	2021	Sep	(\$25,350)	(\$328,336)	\$5,851,132	\$10,979	\$3,045,379
SPS.HARRNGTN2	2021	Oct	(\$23,726)	(\$367,704)	\$6,623,861	\$24,701	\$2,865,970
SPS.HARRNGTN2	2021	Nov	(\$24,060)	(\$952,067)	\$6,171,948	\$46,515	\$2,911,377
SPS.HARRNGTN2	2021	Dec	(\$21,845)	(\$677,579)	\$3,874,024	\$41,120	\$2,769,574
SPS.HARRNGTN3	2021	Jan	(\$27,098)	(\$273,332)	\$4,415,813	\$13,536	\$3,066,483
SPS.HARRNGTN3	2021	Feb	(\$27,020)	(\$1,188,663)	\$117,837,770	\$7,151	\$3,059,662
SPS.HARRNGTN3	2021	Mar	(\$20,636)	\$94,634	\$3,007,858	\$44,791	\$2,403,822
SPS.HARRNGTN3	2021	Apr	(\$25,209)	(\$166,185)	\$4,621,413	\$12,801	\$2,933,770
SPS.HARRNGTN3	2021	May	(\$18,188)	(\$142,996)	\$3,366,551	\$33,602	\$2,132,813
SPS.HARRNGTN3	2021	Jun	(\$28,540)	(\$189,669)	\$5,924,951	\$21,533	\$3,272,348
SPS.HARRNGTN3	2021	Jul	(\$33,139)	(\$530,551)	\$8,009,670	\$0	\$3,823,032
SPS.HARRNGTN3	2021	Aug	(\$28,496)	(\$183,837)	\$6,597,981	\$8,581	\$3,312,455
SPS.HARRNGTN3	2021	Sep	(\$24,372)	(\$803,870)	\$5,334,027	\$39,936	\$2,848,994
SPS.HARRNGTN3	2021	Oct	(\$2,137)	(\$42,002)	\$625,482	\$0	\$247,827
SPS.HARRNGTN3	2021	Nov	\$0	\$0	\$0	\$0	\$0
SPS.HARRNGTN3	2021	Dec	(\$116)	(\$5,710)	(\$5,710)	\$22,835	\$17,126
			<b>(\$767,317)</b>	<b>(\$14,520,574)</b>	<b>\$478,115,029</b>	<b>\$1,089,502</b>	<b>\$91,339,333</b>

P&L without RNU + Admin Fees      **\$388,744,286**

PositionName	Year	Month	RT AS Cost (\$)	RT Tot Cost (\$)	RT MWP Elig Flg	RT Startup Elig Flg	RT Mitigated Flg Gen
SPS.HARRNGTN1	2021	Jan	\$0	\$2,665,753	312	0	0
SPS.HARRNGTN1	2021	Feb	\$0	\$2,750,080	0	0	0
SPS.HARRNGTN1	2021	Mar	\$0	\$1,670,512	156	0	0
SPS.HARRNGTN1	2021	Apr	\$0	\$2,622,590	360	0	0
SPS.HARRNGTN1	2021	May	\$0	\$1,514,944	18	0	0
SPS.HARRNGTN1	2021	Jun	\$0	\$3,442,571	120	0	0
SPS.HARRNGTN1	2021	Jul	\$0	\$2,911,763	12	0	0
SPS.HARRNGTN1	2021	Aug	\$0	\$3,562,281	0	0	0
SPS.HARRNGTN1	2021	Sep	\$0	\$2,966,381	0	0	0
SPS.HARRNGTN1	2021	Oct	\$0	\$2,928,429	1047	0	0
SPS.HARRNGTN1	2021	Nov	\$0	\$2,631,393	642	0	0
SPS.HARRNGTN1	2021	Dec	\$0	\$2,658,855	339	0	0
SPS.HARRNGTN2	2021	Jan	\$0	\$2,791,828	600	0	0
SPS.HARRNGTN2	2021	Feb	\$0	\$2,488,620	120	0	0
SPS.HARRNGTN2	2021	Mar	\$0	\$2,172,336	378	0	0
SPS.HARRNGTN2	2021	Apr	\$0	\$1,372,997	156	0	0
SPS.HARRNGTN2	2021	May	\$419	\$3,020,966	960	0	0
SPS.HARRNGTN2	2021	Jun	\$0	\$3,348,891	0	0	0
SPS.HARRNGTN2	2021	Jul	\$0	\$2,650,127	0	0	0
SPS.HARRNGTN2	2021	Aug	\$0	\$3,219,229	120	0	0
SPS.HARRNGTN2	2021	Sep	\$0	\$3,056,359	424	0	0
SPS.HARRNGTN2	2021	Oct	\$0	\$2,890,671	984	0	0
SPS.HARRNGTN2	2021	Nov	\$0	\$2,957,892	429	0	0
SPS.HARRNGTN2	2021	Dec	\$0	\$2,810,695	1335	0	0
SPS.HARRNGTN3	2021	Jan	\$359	\$3,080,378	240	0	0
SPS.HARRNGTN3	2021	Feb	\$0	\$3,066,812	120	0	0
SPS.HARRNGTN3	2021	Mar	\$0	\$2,448,613	770	0	0
SPS.HARRNGTN3	2021	Apr	\$0	\$2,946,571	1195	0	0
SPS.HARRNGTN3	2021	May	\$688	\$2,167,103	204	0	0
SPS.HARRNGTN3	2021	Jun	\$0	\$3,293,881	36	0	0
SPS.HARRNGTN3	2021	Jul	\$0	\$3,823,032	0	0	0
SPS.HARRNGTN3	2021	Aug	\$0	\$3,321,036	144	0	0
SPS.HARRNGTN3	2021	Sep	\$0	\$2,888,930	300	0	0
SPS.HARRNGTN3	2021	Oct	\$0	\$247,827	0	0	0
SPS.HARRNGTN3	2021	Nov	\$0	\$0	0	0	0
SPS.HARRNGTN3	2021	Dec	\$0	\$39,960	0	0	0
			<b>\$1,467</b>	<b>\$92,430,302</b>	<b>11521</b>	<b>0</b>	<b>0</b>

P&L without RNU + Admin Fees      **\$388,744,286**

PositionName	Year	Month	Startup Mitigated Flg	RT CFG
SPS.HARRNGTN1	2021	Jan	0	-
SPS.HARRNGTN1	2021	Feb	0	-
SPS.HARRNGTN1	2021	Mar	0	-
SPS.HARRNGTN1	2021	Apr	0	-
SPS.HARRNGTN1	2021	May	0	-
SPS.HARRNGTN1	2021	Jun	0	-
SPS.HARRNGTN1	2021	Jul	0	-
SPS.HARRNGTN1	2021	Aug	0	-
SPS.HARRNGTN1	2021	Sep	0	-
SPS.HARRNGTN1	2021	Oct	0	-
SPS.HARRNGTN1	2021	Nov	0	-
SPS.HARRNGTN1	2021	Dec	0	-
SPS.HARRNGTN2	2021	Jan	0	-
SPS.HARRNGTN2	2021	Feb	0	-
SPS.HARRNGTN2	2021	Mar	0	-
SPS.HARRNGTN2	2021	Apr	0	-
SPS.HARRNGTN2	2021	May	0	-
SPS.HARRNGTN2	2021	Jun	0	-
SPS.HARRNGTN2	2021	Jul	0	-
SPS.HARRNGTN2	2021	Aug	0	-
SPS.HARRNGTN2	2021	Sep	0	-
SPS.HARRNGTN2	2021	Oct	0	-
SPS.HARRNGTN2	2021	Nov	0	-
SPS.HARRNGTN2	2021	Dec	0	-
SPS.HARRNGTN3	2021	Jan	0	-
SPS.HARRNGTN3	2021	Feb	0	-
SPS.HARRNGTN3	2021	Mar	0	-
SPS.HARRNGTN3	2021	Apr	0	-
SPS.HARRNGTN3	2021	May	0	-
SPS.HARRNGTN3	2021	Jun	0	-
SPS.HARRNGTN3	2021	Jul	0	-
SPS.HARRNGTN3	2021	Aug	0	-
SPS.HARRNGTN3	2021	Sep	0	-
SPS.HARRNGTN3	2021	Oct	0	-
SPS.HARRNGTN3	2021	Nov	0	-
SPS.HARRNGTN3	2021	Dec	0	-
			<b>0</b>	-

P&L without RNU + Admin Fees      **\$388,744,286**