



## Filing Receipt

**Received - 2021-09-30 05:00:01 PM**

**Control Number - 52485**

**ItemNumber - 20**

**DOCKET NO. 52485**

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

**SOUTHWESTERN PUBLIC SERVICE COMPANY'S  
RESPONSE TO COMMISSION STAFF'S  
FIRST REQUEST FOR INFORMATION  
QUESTION NOS. 1-1 THROUGH 1-5**

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**EXHIBITS ATTACHED:**

Exhibit SPS-Staff 1-1 Unit O – New Drawings (HS)  
Exhibit SPS-Staff 1-1 Unit 1 – Existing Drawings (HS)  
Exhibit SPS-Staff 1-1 Unit 1 – New Drawings (HS)  
Exhibit SPS-Staff 1-1 Unit 1 – NAAQS SOW (HS)  
Exhibit SPS-Staff 1-1 Unit 1 – CE Instruction Manual (HS)  
Exhibit SPS-Staff 1-1 Unit 1 – CE Boiler Book (HS)

**DOCKET NO. 52485**

**APPLICATION OF SOUTHWESTERN § BEFORE THE STATE OFFICE OF  
PUBLIC SERVICE COMPANY FOR §  
AUTHORITY TO CHANGE RATES § ADMINISTRATIVE HEARINGS**

**SOUTHWESTERN PUBLIC SERVICE COMPANY'S  
RESPONSE TO COMMISSION STAFF'S  
FIRST REQUEST FOR INFORMATION  
QUESTION NOS. 1-1 AND 1-5**

Southwestern Public Service Company ("SPS") files this response to the Public Utility Commission of Texas Staff's ("Staff") First Request for Information, Question Nos. 1-1 and 1-5. SPS has provided notice, by email, to all parties that SPS's Responses to Staff's 1st 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 Staff's First 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 600 Congress Avenue, Suite 2000, Austin, Texas 78701; telephone number (512) 721-2700. Voluminous exhibits will also be provided on SPS’s file sharing platform.

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 SPS’s file sharing platform 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 Amarillo, Texas, unless otherwise indicated. SPS requests that parties wishing to inspect this material provide at least 48-hour notice of their intent by contacting Mark A. Santos 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 [mark.santos@crtxlaw.com](mailto:mark.santos@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.

Respectfully submitted,

  
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ATTORNEYS FOR  
SOUTHWESTERN PUBLIC SERVICE COMPANY

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*PUC Docket No. 52485  
Southwestern Public Service Company's Response to  
Commission Staff's First Request for Information*

## **RESPONSES**

### **QUESTION NO. Staff 1-1:**

Please provide the detailed construction and design plans for the plant. Please provide these requested plans for the plant both as (a) currently designed and (b) with the proposed changes to the plant, including location.

### **RESPONSE:**

Please see the following highly sensitive exhibits provided pursuant the Protective Order in effect for this proceeding:

Exhibit SPS-Staff 1-1\_Unit O – New Drawings (HS)  
Exhibit SPS-Staff 1-1\_Unit 1 – Existing Drawings (HS)  
Exhibit SPS-Staff 1-1\_Unit 1 – New Drawings (HS)  
Exhibit SPS-Staff 1-1\_NAAQS SOW (HS)  
Exhibit SPS-Staff 1-1\_CE Instruction Manual (HS)  
Exhibit SPS-Staff 1-1\_CE Boiler Book (HS)

Preparers: Brian T. Hudson, Danelle R. Heidingsfelder  
Sponsor: Mark M. Lytal

**QUESTION NO. Staff 1-2:**

Please provide details for the natural gas pipeline and routes under consideration.

**RESPONSE:**

Please see the Direct Testimony of Mark Lytal at page 13, line 1 through page 15, line 19 and Attachment ML-2.

Preparers: Brian T. Hudson, Danelle R. Heidingsfelder  
Sponsor: Mark M. Lytal

**QUESTION NO. Staff 1-3:**

Please provide the Environmental Assessment (EA) and route analysis for the construction of new pipeline as referred on page 6 of the application. Please provide this in native file format. Please include the correspondence with state, federal and other agencies

**RESPONSE:**

Please see Exhibit SPS-Staff 1-3 for the Environmental Assessment. Pursuant to agreement, the native file was transmitted to parties that executed protective order certifications electronically on September 29, 2021.

Preparer: Stacey Atella  
Sponsor: Anastacia Santos



**QUESTION NO. Staff 1-4**

Please provide the detailed cost analysis of the plant and comparative cost analysis for the routes under consideration for the gas pipeline. Please provide this in native file format.

**RESPONSE:**

Please see the Direct Testimony of Mark Lytal at page 18, line 1 through page 20, line 13 and Attachment ML-1. Pursuant to agreement, the native file was transmitted to parties that executed protective order certifications electronically on September 29, 2021.

Preparers: Brian T. Hudson, Danelle R. Heidingsfelder  
Sponsor: Mark M. Lytal

**QUESTION NO. Staff 1-5:**

Please explain whether SPS or some other company will own the pipeline.

**RESPONSE:**

SPS will own the pipeline.

Preparers: Brian T. Hudson, Danelle R. Heidingsfelder  
Sponsor: Mark M. 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 September 30, 2021, in accordance with the Order Suspending Rules, issued in Project No. 50664.



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Mark A. Santos