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DOCKET NO. 52485

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

**SOUTHWESTERN PUBLIC SERVICE COMPANY'S
RESPONSE TO COMMISSION STAFF'S
THIRD REQUEST FOR INFORMATION
QUESTION NOS. 3-1 THROUGH 3-8**

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EXHIBITS ATTACHED:

Exhibit SPS-Staff 3-1 *(provided in native format)*

Exhibit SPS-Staff 3-8 *(provided in native format)*

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
THIRD REQUEST FOR INFORMATION
QUESTION NOS. 3-1 AND 3-8**

Southwestern Public Service Company ("SPS") files this response to the Public Utility Commission of Texas Staff's ("Staff") Third Request for Information, Question Nos. 3-1 and 3-8. SPS has provided notice, by email, to all parties that SPS's Responses to Staff's 3rd 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 Third 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.

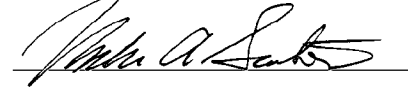
II. INSPECTIONS

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. 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

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

RESPONSES

QUESTION NO. Staff 3-1:

Please provide SPS's energy sales (GWh) and peak demand (MW) by rate class for each of the last five calendar years.

RESPONSE:

The Table below shows SPS energy sales by class for 2016 – 2020. Please refer to Exhibit SPS-Staff 3-1.1 through Exhibit SPS-Staff 3-1.4 for peak data. SPS does not maintain peak demand (MW) by rate class in the normal course of business. SPS calculates peak data for rate case proceedings. For that reason, the information in Exhibits SPS-Staff-3.1.1 through 3.1.4 reflects data for test years that fall within the last five calendar years.

Year	Residential	Small C&I	Large C&I	Street Light	Other Pub Auth	Total Retail	Total Wholesale	Total SPS
2016	3,478	4,707	10,518	47	508	19,259	5,419	24,678
2017	3,356	4,701	10,721	47	480	19,305	4,917	24,223
2018	3,645	5,041	11,214	47	503	20,450	4,982	25,433
2019	3,656	5,096	11,732	43	500	21,027	3,650	24,677
2020	3,787	4,819	11,452	37	479	20,574	2,508	23,082

Preparers: Arslan R. Gohir, Taylor Hurt
Sponsor: John M. Goodenough

QUESTION NO. Staff 3-2:

Please provide SPS's existing generation units, with their corresponding ages and the planned retirement date.

RESPONSE:

Unit Name	Planned Retirement Date	Age of Unit (years)
<u>Steam Production – Gas/Oil</u>		
Jones Unit 1	2031	50
Jones Unit 2	2034	47
Plant X Unit 1	2022	69
Plant X Unit 2	2022	68
Plant X Unit 3	2022	66
Plant X Unit 4	2027	57
<u>Steam Production - Gas</u>		
Cunningham Unit 1	2022	64
Cunningham Unit 2	2025	56
Maddox Unit 1	2028	54
Nichols Unit 1	2022	61
Nichols Unit 2	2023	59
Nichols Unit 3	2030	53
<u>Steam Production - Coal</u>		
Harrington Unit 1	2036	45
Harrington Unit 2	2038	43
Harrington Unit 3	2040	41
Tolk Unit 1	2032	39
Tolk Unit 2	2032	36
<u>Turbine - Gas</u>		
Cunningham Unit 3	2040	23
Cunningham Unit 4	2040	23
Maddox Unit 2	2025	45
Jones Unit 3	2056	10
Jones Unit 4	2058	8
<u>Turbine - Fuel Oil</u>		
Quay	2034	8
<u>Other Production - Wind</u>		
Hale	2044	2
Sagamore	2050	<1

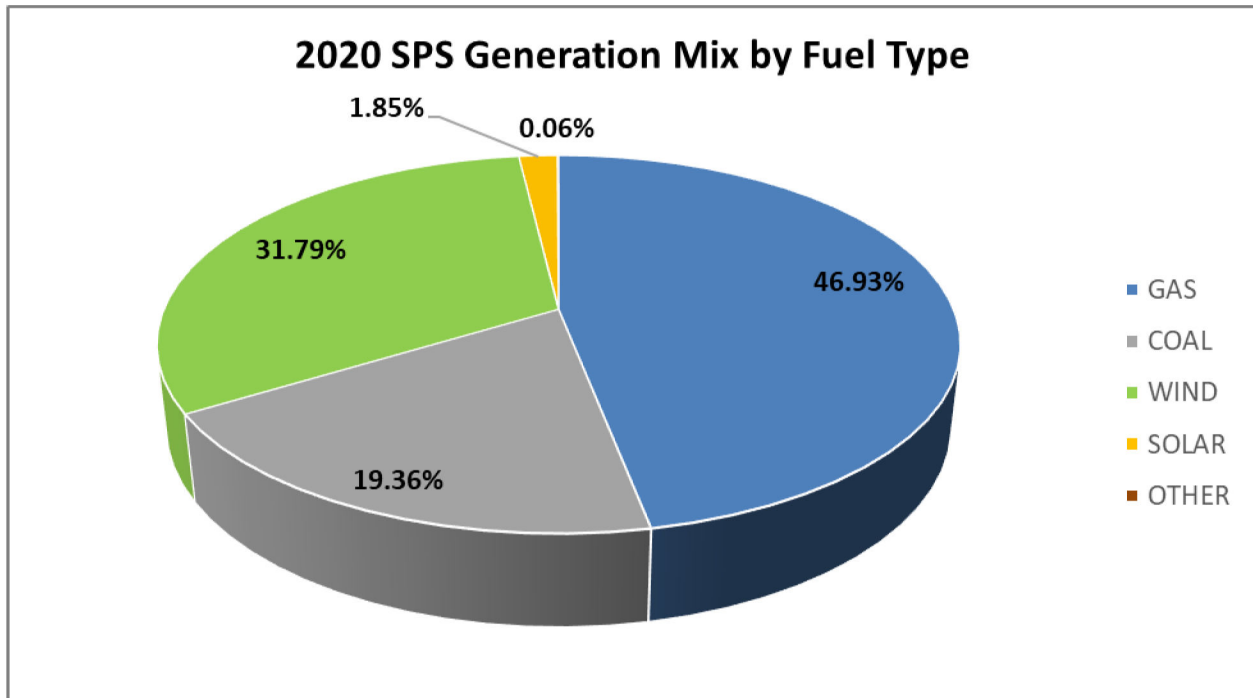
Preparer: Ashley Gibbons
Sponsor: Ben R. Elsey, Mark Lytal

QUESTION NO. Staff 3-3:

What is SPS's current energy mix for meeting customers energy requirements?

RESPONSE:

Please see SPS's energy mix for the year 2020 below. The category "OTHER" refers to carbon black, diesel fuel, and fuel oil technologies.



Preparers: Ashley Gibbons, Ben Elsey
Sponsor: Ben R. Elsey

QUESTION NO. Staff 3-4

Please explain if SPS uses other energy sources to serve load.

RESPONSE:

No. Please refer to SPS's response to Staff 3-3 for SPS's 2020 energy mix.

Preparer: Ben R. Elsey

Sponsor: Ben R. Elsey

QUESTION NO. Staff 3-5:

Please describe SPS's current generating resources (including purchased power agreements) and the fuel type they use.

RESPONSE:

Please refer to SPS's Response to Staff 3-2 for SPS's owned generating resources. Please refer to the table below for SPS's purchase power agreements.

Purchased Power Agreement	Capacity (MW)	Expiration Date
<u>Thermal PPAs</u>		
Sid Richardson	5	2021
Blackhawk	223	2023
Lea Power	558	2033
<u>Wind PPAs</u>		
Caprock Wind	80	2024
San Juan Wind	120	2025
Wildorado Wind	161	2027
Spinning Spur Wind	161	2027
Mammoth Wind	199	2034
Palo Duro Wind	249	2034
Roosevelt Wind	250	2035
Lorenzo Wind	80	2048
Wildcat Wind	150	2048
<u>Solar PPAs</u>		
Sun Edison Solar	50	2031
Chaves Solar	70	2041
Roswell Solar	70	2041

Preparers: Ashley Gibbons, Ben R. Elsey, Mark Baylor

Sponsor: Ben R. Elsey

QUESTION NO. Staff 3-6:

Please provide the data supporting fuel costs for all electric power supply resources (owned and purchased) and market energy costs (which are forecasted based on gas prices), in testimony of Ben Elsey's at page 13.

RESPONSE:

Please refer to Exhibit SPS-Staff 3-6(CONF).

Preparers: Ben R. Elsey, Ashley Gibbons, Elie Nakouzi
Sponsor: Ben R. Elsey

QUESTION NO. Staff 3-7:

Please explain if SPS plans to add renewable generation to the system after 2025.

RESPONSE:

Although SPS has no current plans to add renewable generation to the system after 2025, SPS continues to evaluate the opportunity to add renewable generation in the future.

Preparer: Bennie Weeks

Sponsor: Ben R. Elsey

QUESTION NO. Staff 3-8:

Please provide documents and describe SPS's analysis and selection process for transmission network upgrade costs proposals.

RESPONSE:

SPS interprets this question to be regarding the transmission network upgrade cost sensitivities SPS used in its economic analysis in this case. In determining the transmission network upgrade costs SPS first reviewed the costs resulting from Southwest Power Pool's Phase I 2017-01 Definitive Interconnection System Impact Study ("DISIS"). As described on page 40 of the Direct Testimony of Mr. Elsey, Southwest Power Pool assigned an average of \$934/kW in transmission network upgrade costs to proposed generation in the pool. With an expectation these costs could ultimately be reduced but without knowing by how much, SPS reasonably evaluated three different cost sensitivities: \$200/kW, \$400/kW and \$600/kW.

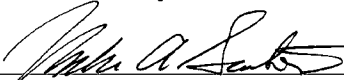
Please refer to Exhibit SPS-Staff 3-8 which includes the Southwest Power Pool's Phase I DISIS studies.

Preparers: Bennie Weeks, Ben R. Elsey, Kevin Pera

Sponsor: Ben R. Elsey

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 October 20, 2021, in accordance with the Order Suspending Rules, issued in Project No. 50664.



Mark Santos

The following files are not convertible:

Exhibit SPS-Staff 3-1.1.xlsx
Exhibit SPS-Staff 3-1.2.xlsx
Exhibit SPS-Staff 3-1.3.xls
Exhibit SPS-Staff 3-1.4.xls
Exhibit SPS-Staff 3-8.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.