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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 FIRST SUPPLEMENTAL RESPONSE TO COMMISSION STAFF'S THIRD REQUEST FOR INFORMATION QUESTION NO. 3-6

(Filename: SPS1stSuppRespStaff3rd.doc; Total Pages: 6)

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EX	HIBITS ATTACHED:	

Exhibit SPS-Staff 3-6(CONF)

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§
§
§ PUBLIC UTILITY COMMISSION
§
§ OF TEXAS
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§

SOUTHWESTERN PUBLIC SERVICE COMPANY'S FIRST SUPPLEMENTAL RESPONSE TO COMMISSION STAFF'S THIRD REQUEST FOR INFORMATION OUESTION NO. 3-6

Southwestern Public Service Company ("SPS") files this supplemental response to the Public Utility Commission of Texas Staff's ("Staff") Third Request for Information, Question Nos. 3-6.

I. WRITTEN SUPPLEMENTAL RESPONSES

SPS's written supplemental 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.

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Respectfully submitted,

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ATTORNEYS FOR
SOUTHWESTERN PUBLIC SERVICE COMPANY

SUPPLEMENTAL RESPONSES

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.

OCTOBER 21, 2021 SUPPLEMENTAL RESPONSE:

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

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

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 21, 2021, in accordance with the Order Suspending Rules, issued in Project No. 50664.

Mark Santos