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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 SIERRA CLUB'S
FIRST REQUEST FOR INFORMATION
QUESTION NO. 1-3**

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EXHIBITS ATTACHED:

SPS-Sierra Club 1-3(i)(SUPP 01)(HS)(USB)

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PUBLIC SERVICE COMPANY TO	§	
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**SOUTHWESTERN PUBLIC SERVICE COMPANY'S
FIRST SUPPLEMENTAL RESPONSE TO SIERRA CLUB'S
FIRST REQUEST FOR INFORMATION
QUESTION NO. 1-3**

Southwestern Public Service Company ("SPS") files this supplemental response to the Sierra Club's First Request for Information, Question No. 1-3. SPS has provided notice, by email, to all parties that SPS's Responses to Sierra Club'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 supplemental responses to Sierra Club'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.

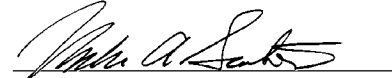
If responsive documents are more than 100 pages but less than eight linear feet in length, the response will indicate that the attachment is voluminous (“(V)”) and, pursuant to 16 TAC § 22.144(h)(2), the exhibit will be made available for inspection at SPS’s voluminous room at 600 Congress Avenue, Suite 2000, Austin, Texas 78701; telephone number (512) 721-2700.

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. 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 1-3:

Please refer to the Direct Testimony of Ben R. Elsey at page 13. Please provide all Encompass and all Strategist modeling input and output files supporting SPS/Xcel's application and supporting testimony (in electronic, machine-readable format with formulae intact).

NOVEMBER 11, 2021 SUPPLEMENTAL RESPONSE:

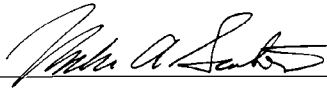
The following supplements SPS's initial response filed on November 10, 2021. Please refer to Exhibit SPS-Sierra Club 1-3(i)(SUPP 01)(HS)(USB)

Preparer: Mark Christner, Ben R. Elsey

Sponsor: Ben R. Elsey

CERTIFICATE OF SERVICE

I certify that on the 11th day of November 2021, a true and correct copy of the foregoing instrument was served on all parties of record by electronic service and by either hand-delivery, Federal Express, regular first-class mail, certified mail, or facsimile transmission.



Mark A. Santos