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

APPLICATION OF SOUTHWESTERN	§	
PUBLIC SERVICE COMPANY TO	§	BEFORE THE STATE OFFICE
AMEND ITS CERTIFICATE OF	§	
CONVENIENCE AND NECESSITY TO	§	OF
CONVERT HARRINGTON	§	
GENERATING STATION FROM COAL	§	ADMINISTRATIVE HEARINGS
TO NATURAL GAS	§	

**ALLIANCE OF XCEL MUNICIPALITIES’
FIRST SET OF REQUESTS FOR INFORMATION TO
SOUTHWESTERN PUBLIC SERVICE COMPANY**

Alliance of Xcel Municipalities’ (“AXM”) First Set of Requests for Information ("RFIs") to Southwestern Public Service Company (“SPS”) is hereby filed in this docket. Responses to the RFIs set forth on Exhibit A should be served on Alfred R. Herrera, Herrera Law & Associates, PLLC at 4524 Burnet Road, Austin, Texas 78756, within twenty (20) days of service hereof or no later than **January 26, 2022**. Exhibit A is attached hereto and incorporated herein for all purposes.

Definitions

1. “SPS,” the “Company,” and “Applicant” refer to Southwestern Public Service Company and its affiliates.
2. “You,” “yours,” and “your” refer to SPS (as defined above), including its directors, officers, employees, consultants, agents and attorneys.
3. “Document” and “documents” mean any written, recorded, filmed, or graphic matter, whether produced, reproduced, or on paper, cards, tapes, film, electronic facsimile, computer storage device of any other media, including, but not limited to, memoranda, notes, analyses, minutes, records, photographs, correspondence, telegrams, diaries, bookkeeping entries, financial statements, tax returns, checks, check stubs, reports, studies, charts, graphs, statements, notebooks, handwritten notes, applications, contracts, agreements, books, pamphlets, periodicals, appointment calendars, records and recordings of oral conversations, work papers, observations, commercial practice manuals, reports and summaries of interviews, reports of consultants, appraisals, forecasts, tape recordings, or any form of recording that is capable of being transcribed into written form.

4. The term “communication” includes all verbal and written communications (including written records of verbal communications) of every kind, including but not limited to, telephone calls, conferences, letters and all memoranda or other documents concerning the requested item. Where communications are not in writing, provide copies of all memoranda and documents and describe in full the substance of the communication to the extent that substance is not reflected in the memoranda and documents provided and to the extent it is within the knowledge of SPS.
5. “Identification” of a document includes stating (a) the nature of the document (e.g., letter, memorandum, corporate minutes), (b) the date, if any, appearing thereon, (c) the date, if known, on which the document was prepared, (d) the title of the document, (e) the general subject matter of the document, (f) the number of pages comprising the document, (g) the identity of each person who signed or initialed the document, (h) the identity of each person to whom the document was addressed, (i) the identity of each person who received the document or reviewed it, (j) the location of the document, and (k) the identity of each person having custody of, or control over, the document. Identification of a document includes identifying all documents known or believed to exist, whether or not in the custody of SPS or in the custody of its attorneys or other representatives or agents.
6. “Identification” of a person includes stating his or her full name, his or her most recent known business address and telephone number, his or her present position, and his or her prior connection or association with any party to this proceeding.
7. “Person” refers to, without limiting the generality of its meaning, every natural person, corporate entity, partnership, association (whether formally organized or ad hoc), joint venture, unit operation, cooperative, municipality, commission, governmental body or agency.
8. Capitalized terms not otherwise defined herein shall have the meaning attributed to them in the referenced testimony.

Instructions

1. If any RFI appears confusing, please request clarification from the undersigned counsel.
2. In providing your responses, please start each response on a separate page and type, at the top of the page, the RFI that is being answered.
3. As part of the response to each RFI, please state, at the bottom of the answer, the name and job position of each person who participated in any way, other than providing clerical assistance, in the preparing of the answer. If the RFI has sub-parts, please identify the person or persons by sub-part. Please also state the name of the witness in this docket who will sponsor the

answer to the RFI and who can vouch for the truth of the answer. If the RFI has sub-parts, please identify the witness or witnesses by sub-part.

4. Rather than waiting to provide all of the responses at the same time, please provide individual responses as each becomes available.
5. If SPS considers any RFI to be unduly burdensome, or if the response would require the production of a voluminous amount of material, please call the undersigned counsel as soon as possible in order to discuss the situation and to try to resolve the problem. Likewise, if SPS objects to any of the RFIs on the grounds that the RFI seeks proprietary information, or on any other grounds, please call the undersigned counsel as soon as possible.
6. If any document is withheld under any claim of privilege, please furnish a list identifying each document for which a privilege is claimed, together with the following information: date, sender, recipients, recipients of copies, subject matter of the document, and the basis upon which such privilege is claimed.
7. These requests shall be deemed continuing so as to require further and supplemental responses if SPS receives or generates additional information within the scope of these requests between the time of the original response and the time of the hearings.

Respectfully submitted,

HERRERA LAW & ASSOCIATES, PLLC

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**ATTORNEYS FOR ALLIANCE OF XCEL
MUNICIPALITIES**

CERTIFICATE OF SERVICE

I hereby certify that on this 6th day of January, 2022, a true and correct copy of the *Alliance of Xcel Municipalities' First Set of RFIs to SPS* was served upon all parties of record via electronic mail, in accordance with the Order Suspending Rules, issued in Project No. 50664.

By: /s/ Leslie Lindsey
Leslie Lindsey

EXHIBIT A

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**ALLIANCE OF XCEL MUNICIPALITIES’
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- 1-1. Please provide the study period, start date and end date for each of the 2019 and 2021 updated economic analyses described in Company witness Elsey’s direct testimony.
- 1-2. Please provide the required start-up time (hours), ramp rate and load following capability of the converted Harrington units as reflected in each of the 2019 and 2021 updated economic analyses described in Company witness Elsey’s direct testimony.
- 1-3. Please provide the Company’s forecasted native system peak demand and energy requirement for each year of each of the 2019 and 2021 updated economic analyses described in Company witness Elsey’s direct testimony.
- 1-4. Please provide the energy, capacity, fuel and emissions price forecasts used for each of the 2019 and 2021 updated economic analyses described in Company witness Elsey’s direct testimony.
- 1-5. Please provide the energy, capacity, fuel and emissions price forecasts used for the base case and each alternative scenario evaluated in the Company’s most recent Integrated Resource Plan (“IRP”).
- 1-6. Please provide the Company’s forecasted total firm capacity (MW) from owned generating resources and purchased power resources for each year of each of the 2019 and 2021 updated economic analyses described in Company witness Elsey’s direct testimony.
- 1-7. Please provide the Company’s forecasted total carbon emissions from owned generating resources and purchased power resources for each year of each of the 2019 and 2021 updated economic analyses described in Company witness Elsey’s direct testimony.

- 1-8. Reference page 13, lines 5-11 of Company witness Elsey's direct testimony, please provide the underlying data for each year for each component (e.g., fuel, energy, capacity and O&M costs) of the estimated NPV benefits savings as reflected in each of the Tables included in Attachment BRE-1 of witness Elsey's direct testimony.
- 1-9. Please provide the following information for each existing and new generating unit and purchased power resource included in each year of each of the 2019 economic analyses performed prior to the finalized Agreed Order with TCEQ as referenced on page 6 of Company witness Elsey's direct testimony:
- a. Net dependable capacity rating (MW)
 - b. Fixed O&M expense
 - c. Variable O&M expense
 - d. Fuel expense
 - e. Purchased capacity amount (MW) and cost
 - f. Purchased energy volume (MWh) and cost
 - g. Forced outage hours
 - h. Planned outage hours including refueling outages
 - i. Annual capital additions costs
 - j. Net generation, MWh
 - k. Average annual net heat rate
 - l. Annual net capacity factor
 - m. Carbon emissions volume
 - n. Carbon emissions cost
- 1-10. Please provide the following information for each existing and new generating unit and purchased power resource included in each year of each of the 2021 updated economic analyses supporting SPS's decision to convert the Harrington units to operate on natural gas as referenced on page 6 of Company witness Elsey's direct testimony:
- a. Net dependable capacity rating (MW)
 - b. Fixed O&M expense
 - c. Variable O&M expense
 - d. Fuel expense
 - e. Purchased capacity amount (MW) and cost
 - f. Purchased energy volume (MWh) and cost
 - g. Forced outage hours
 - h. Planned outage hours including refueling outages
 - i. Annual capital additions costs
 - j. Net generation, MWh
 - k. Average annual net heat rate
 - l. Annual net capacity factor

- m. Carbon emissions volume
 - n. Carbon emissions cost
- 1-11. Please provide the commercial operation and retirement dates for each SPS existing and new generating unit for each of the 2019 and 2021 updated economic analyses described in Company witness Elsey's direct testimony.
- 1-12. Please identify each fixed input or constraint placed on the resource type, resource capacity rating, annual resource additions (MW) or timing of addition of new generating resources as included in each year of each of the 2019 and 2021 updated economic analyses described in Company witness Elsey's direct testimony and explain the basis and purpose of such fixed inputs or constraints.
- 1-13. Please provide the levelized cost of energy over the study period for the Harrington generating units and each new generating unit resource evaluated in each of the 2019 and 2021 update economic analyses described in Company witness Elsey's direct testimony.
- 1-14. Please provide the following information for each existing Company generating unit and purchased power resource for each of the last three calendar years:
- a. Net dependable capacity rating (MW)
 - b. Non-fuel O&M expense
 - c. Fuel expense
 - d. Forced outage hours
 - e. Planned outage hours including refueling outages
 - f. Annual capital additions costs
 - g. Net generation, MWh
 - h. Average annual net heat rate
 - i. Annual net capacity factors
 - j. Carbon emissions volume
 - k. Carbon emissions cost
 - l. Purchased capacity amount (MW) and cost
 - m. Purchased energy volume (MWh) and cost
- 1-15. Please provide the following information for each existing Company generating unit and purchased power resource for each year of the base case analysis for the preferred resource plan from SPS's most recent IRP:
- a. Net dependable capacity rating (MW)
 - b. Fixed O&M expense
 - c. Variable O&M expense
 - d. Fuel expense
 - e. Purchased capacity amount (MW) and cost

- f. Purchased energy volume (MWh) and cost
 - g. Forced outage hours
 - h. Planned outage hours including refueling outages
 - i. Annual capital additions costs
 - j. Net generation, MWh
 - k. Average annual net heat rate
 - l. Annual net capacity factors
 - m. Carbon emissions volume
 - n. Carbon emissions cost
- 1-16. Please provide the total modeled production costs by major cost category (e.g., fuel, O&M, capital additions, purchased energy, purchased capacity) for each year of each of the 2019 and 2021 updated economic analyses described in Company witness Elsey's direct testimony.
 - 1-17. Please provide the total cumulative net present value of modeled production costs by major cost category (e.g., fuel, O&M, capital additions, purchased energy, purchased capacity) over the study periods for each of the 2019 and 2021 updated economic analyses described in Company witness Elsey's direct testimony.
 - 1-18. Please provide SPS solicitations for purchased capacity and/or energy since January of 2019 and the resultant volume and prices of bids received in response to each of those solicitations.
 - 1-19. Please identify the types and cost of resources selected to replace the Harrington coal units when they retired in the base case scenarios for the preferred resource plan as reflected in the Company's most recent two IRPs.
 - 1-20. Reference page 8, lines 16-20 of Company witness Elsey's direct testimony, please provide the estimated cumulative NPV cost impact associated with replacement capacity due to retirement of the Harrington coal units at the end of 2024 when compared to costs that would be incurred if the units are converted to operate on natural gas.
 - 1-21. Reference page 8, lines 16-20 of Company witness Elsey's direct testimony, please provide the estimated cumulative NPV cost increase to customers associated with accelerated collection of the remaining depreciation expense due to retirement of the Harrington coal units at the end of 2024 when compared to costs that would be incurred if the units are converted to operate on natural gas.
 - 1-22. Please provide the estimated net book value of the Harrington coal units by the end of 2024 assuming the units are not converted to operate on natural gas.

- 1-23. Reference page 8, lines 16-20 of Company witness Elsey's direct testimony, please provide the Commission rules or Orders that would require accelerated collection of the remaining depreciation expense in the event of retirement of the Harrington coal units at the end of 2024.
- 1-24. Reference page 8, lines 20-22 of Company witness Elsey's direct testimony, please provide the estimated cumulative NPV cost increase to customers associated with earlier incurrence of decommissioning costs which would result from retirement of the Harrington coal units at the end of 2024 as compared to costs that would be incurred if the units are converted to operate on natural gas.
- 1-25. Reference page 8, lines 16-20 of Company witness Elsey's direct testimony, please provide the Commission rules or Orders that would require accelerated collection of the remaining depreciation expense in the event of retirement of the Harrington coal units at the end of 2024.