



Filing Receipt

Received - 2022-01-06 04:11:20 PM
Control Number - 52485
ItemNumber - 91

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’
SECOND SET OF REQUESTS FOR INFORMATION TO
SOUTHWESTERN PUBLIC SERVICE COMPANY

Alliance of Xcel Municipalities’ (“AXM”) Second 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 27, 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

PO Box 302799
Austin, TX 78703
4524 Burnet Road
Austin, Texas 78756
(512) 474-1492 (voice)
(512) 474-2507 (fax)

By: /s/ Alfred R. Herrera

Alfred R. Herrera
State Bar No. 09529600
aherrera@herreralawpllc.com

Sergio E. Herrera
sherrera@herreralawpllc.com
State Bar No. 24109999

service@herreralawpllc.com

**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' Second 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

**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’
SECOND SET OF REQUESTS FOR INFORMATION TO
SOUTHWESTERN PUBLIC SERVICE COMPANY**

- 2-1 Please Reference page 6, lines 11-13 of Company witness Elsey’s direct testimony, please provide the referenced Agreed Order with TCEQ.
- 2-2 Please explain whether SPS evaluated extension of existing purchased power agreements as an alternative to conversion one or more of the planned Harrington unit gas conversion projects. If so, identify the case evaluated and provide the results of the analysis in a format comparable to the tables provided in Attachment BRE-1 to Company witness Elsey’s direct testimony. If not, please explain why not.
- 2-3 Please explain whether SPS has contacted existing purchased power suppliers to determine feasibility of extension of such contracts as an alternative to the planned conversion of the Harrington units to operate on natural gas.
- 2-4 Please explain whether SPS evaluated bilateral purchased power agreements as an alternative to conversion one or more of the planned Harrington unit gas conversion projects. If so, identify the case evaluated and provide the results of the analysis in a format comparable to the tables provided in Attachment BRE-1 to Company witness Elsey’s direct testimony. If not, please explain why not.
- 2-5 Please provide SPS’s forecasted peak demand, capacity position and reserve margin for each year of the period 2025-2035 assuming retirement of all three Harrington coal units in December 2024 and with no replacement capacity additions during the period.
- 2-6 Please provide the forecasted SPP regional peak demand, capacity position, and reserve margin for each year of the study period from SPS’s current IRP base case analysis.

- 2-7 Please provide the forecasted SPP regional peak demand, capacity position, and reserve margin for each year of the study period in each of the 2019 and 2021 updated economic analyses described in Company witness Elsey's direct testimony.
- 2-8 Reference page 11, lines 6-8 of Company witness Elsey's direct testimony, please provide the magnitude and type of resources (i.e., peaking, intermediate, or baseload) needed for each year of the study period in each of the 2019 and 2021 updated economic analyses described in Company witness Elsey's direct testimony.
- 2-9 Reference page 11, lines 6-8 of Company witness Elsey's direct testimony, please provide the definition of resource types (i.e., peaking, intermediate, or baseload) and indicate the resource type of the Harrington units before and after conversion to operate natural gas.
- 2-10 Please provide the required start-up time (hours), ramp rate and load following capability of the Harrington coal units as reflected in each of the 2019 and 2021 updated economic analyses described in Company witness Elsey's direct testimony.
- 2-11 Reference page 14, line 11 of Company witness Elsey's direct testimony, please explain how and why the remaining book value of SPS-owned generating units was considered in the EnCompass modeling analyses described in Company witness Elsey's direct testimony.
- 2-12 Reference page 15, lines 19-15 of Company witness Elsey's direct testimony, please explain how the consolidated dispatch of all available generating resources within the SPP was evaluated in the EnCompass modeling analyses described in Company witness Elsey's direct testimony.
- 2-13 Please provide vendor documentation of the capabilities of the EnCompass model
- 2-14 Please provide any analysis conducted by SPS to benchmark or otherwise determine the reasonableness and accuracy of the EnCompass model results and input assumptions as reflected in the 2019 and 2021 updated economic analyses described in Company witness Elsey's direct testimony.
- 2-15 Reference page 15, lines 33-37 of Company witness Elsey's direct testimony, please explain and provide documentation to support the testimony that SPP is currently assigning extremely high transmission network upgrade costs to new generating resources.
- 2-16 Please provide the transmission interconnection and network upgrade costs for the converted Harrington units and for other new generating resource alternatives as reflected in the 2019 and 2021 updated economic analyses described in Company witness Elsey's direct testimony.

- 2-17 Please provide SPS's most recent assessment of the forecasted availability of capacity for purchase from existing or new generating resources located within the SPP region over the next ten years along with supporting workpapers.
- 2-18 Reference page 20, lines 10-15 of Company witness Elsey's direct testimony, please provide the time required for obtaining generation interconnection approvals from SPP for the Hale and Sagamore wind generation facilities and for the Bonita purchased power agreement.
- 2-19 Please provide SPS's most recent analyses supporting the planned retirement dates of generating resources that are scheduled for retirement before 2030 and indicate the primary reasons for each of these retirements by the planned dates.
- 2-20 Please provide SPS's analysis of the transmission reliability benefits of converting the Harrington units to operate on natural gas along with any analysis of transmission reliability benefits that could be provided by alternatives to the Harrington conversion project.
- 2-21 Please provide SPS's analysis of carbon dioxide and other environmental benefits of converting the Harrington units to operate on natural gas along with any analysis of environmental benefits that could be provided by alternatives to the Harrington conversion project.
- 2-22 Reference page 26, lines 18-19 of Company witness Elsey's direct testimony, please provide a comparison of the cost of replacement resources used for the 2019 economic analysis to the costs of replacement resources derived from the referenced RFI which were used for the 2021 updated economic analyses and explain how these changed cost assumptions impacted the results of the Harrington conversion analysis.
- 2-23 Reference Attachment BRE-1 of Company witness Elsey's direct testimony, please provide NPV results of the 2019 analysis of Harrington retirement and conversion scenarios in a format similar to the tables presented in Attachment BRE-1.
- 2-24 Reference Attachment BRE-1 of Company witness Elsey's direct testimony, please provide the NPV results for each of the presented Harrington conversion and retirement scenarios over a ten-year period (2022-2031) in a format similar to the tables presented in Attachment BRE-1.
- 2-25 Reference Attachment Table BRE-2 of Company witness Elsey's direct testimony, please provide the NPV results for each of the presented Harrington conversion and retirement scenarios over a ten-year period (2022-2031) in a format similar to Table BRE-2.

2-26 Reference Attachment Table BRE-3 of Company witness Elsey's direct testimony, please provide the NPV results for each of the presented Harrington conversion and retirement scenarios over a ten-year period (2022-2031) in a format similar to Table BRE-3.