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

APPLICATION OF SOUTHWESTERN PUBLIC SERVICE COMPANY TO AMEND ITS CERTIFICATE OF CONVENIENCE AND NECESSITY TO CONVERT HARRINGTON GENERATING STATION FROM COAL TO NATURAL GAS	§ § § § § § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
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**SOUTHWESTERN PUBLIC SERVICE COMPANY’S
RESPONSE TO TEXAS INDUSTRIAL ENERGY CONSUMERS’
THIRD REQUEST FOR INFORMATION
QUESTION NOS. 3-1 THROUGH 3-5**

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CONVENIENCE AND NECESSITY TO	§	OF
CONVERT HARRINGTON	§	
GENERATING STATION FROM COAL	§	ADMINISTRATIVE HEARINGS
TO NATURAL GAS	§	

SOUTHWESTERN PUBLIC SERVICE COMPANY’S
RESPONSE TO TEXAS INDUSTRIAL ENERGY CONSUMERS
THIRD REQUEST FOR INFORMATION
QUESTION NOS. 3-1 THROUGH 3-5

Southwestern Public Service Company (“SPS”) files this response to the Texas Industrial Energy Consumers’ (“TIEC”) Third Request for Information, Question Nos. 3-1 through 3-5 SPS has provided notice, by email, to all parties that SPS’s Responses to TIEC’s Third 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 TIEC’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.

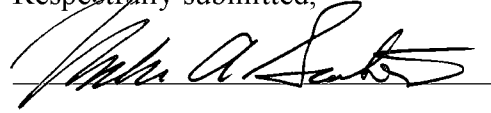
II. INSPECTIONS

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 via email through Coffin Renner LLP’s file sharing link.

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 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 LLP 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.

Respectfully submitted,



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ATTORNEYS FOR
SOUTHWESTERN PUBLIC SERVICE COMPANY

RESPONSES

QUESTION NO. TIEC 3-1:

What measures will SPS take to ensure that, if the Harrington Station is fully converted to gas operations, SPS will have sufficient gas supply to meet retail customers' needs without interruption during extreme weather events?

RESPONSE:

SPS contracts for firm gas transportation and gas storage services with ONEOK, El Paso Natural Gas, Northern Natural Gas, MarkWest New Mexico and MarkWest Power Tex to support delivery of natural gas to all of the SPS power plants, including Harrington Station. Each of these contracts is capable of delivering to multiple power plant locations, providing SPS with the flexibility to redirect natural gas supplies where it is needed to support the ever-changing load demands on the system. SPS continually reviews its portfolio of gas transportation agreements and adjusts the level of contract capacity needed to support reliable system operations. SPS has engaged in preliminary discussions with ONEOK, Northern Natural Gas, El Paso Natural Gas and Natural Gas Pipeline Company of America regarding incremental gas transportation and gas storage services to support future operations of the SPS power plants, including the conversion of Harrington Station.

Preparer: Jeffrey Hild
Sponsor: William A. Grant

QUESTION NO. TIEC 3-2:

Explain whether SPS is planning to acquire or develop backup fuel capabilities for either the converted Harrington Station or any other SPS-owned gas or renewable resource in the event that gas deliveries are curtailed during extreme weather events. If no such backup fuel capabilities are being planned, what measures will SPS take to maintain uninterrupted electricity service to retail customers during such events?

RESPONSE:

SPS's proposal contemplates obtaining gas supply from two different natural gas pipelines so as to provide diversity of gas source. SPS currently maintains fuel oil storage at some of its facilities as a backup supply to natural gas. SPS currently has no formal plans developed to acquire backup fuel capabilities but is in the initial process of reviewing options. SPS's service will remain subject to Southwest Power Pool's requirements related to load shed and balancing.

Preparer: Jeffrey Haskins
Sponsor: William A. Grant

QUESTION NO. TIEC 3-3:

Provide the cost and storage capacity for all natural gas storage options supporting operations at the converted Harrington plant that have been considered by SPS. If no such options have been considered, explain why.

RESPONSE:

SPS currently holds firm gas storage capacity of 600,000 Dth with ONEOK Texas Gas Storage at a cost of \$1.3 million per year and 4,000,000 Dth with Northern Natural Gas at a cost of \$5.1 million per year. Each of these facilities are currently used to support balancing of gas transportation service to the SPS power plants, including Harrington Station. SPS has engaged in preliminary discussions with ONEOK, Northern Natural Gas, El Paso Natural Gas and Natural Gas Pipeline Company of America regarding incremental gas storage capacity to support future operations of the SPS power plants, including the conversion of Harrington Station. SPS has not reached agreement with any of these companies on capacity and costs to support future operations.

Preparer: Jeffrey Hild
Sponsor: William A. Grant

QUESTION NO. TIEC 3-4

Does the analysis provided in either BRE-2 and BRE-3 include the cost of backup fuel or storage capabilities to maintain uninterrupted electricity service to retail customers during extreme weather events? If so, describe the specific backup facilities that were modeled and quantify the costs associated with these facilities.

RESPONSE:

No.

Preparer: Ben R. Elsey
Sponsor: Ben R. Elsey

QUESTION NO. TIEC 3-5:

Please state whether and identify the circumstances in which the Tolk plant would be used to provide backup power in the event of a gas supply shortage during an extreme winter weather event. The response should indicate the time required to bring the plant on line and for how long the plant could remain operational.

RESPONSE:

Tolk is available to provide power in the event of certain generation shortages, price spikes, or system reliability situations. It takes up to 112 hours to convert the units to generating mode. Tolk has limits on available water supply which is being actively managed by the company. SPS will maintain water reserves to ensure reliability in a cold weather event. The plant could remain operational long enough to get through a cold weather event.

Preparer: Jeffrey Haskins
Sponsor: William A. Grant

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 January 12, 2022, in accordance with the Order Suspending Rules, issued in Project No. 50664.



Mark A. Santos