



## Filing Receipt

**Received - 2022-01-13 03:14:56 PM**  
**Control Number - 52485**  
**ItemNumber - 97**

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

<b>APPLICATION OF SOUTHWESTERN PUBLIC SERVICE COMPANY TO AMEND ITS CERTIFICATE OF CONVENIENCE AND NECESSITY TO CONVERT HARRINGTON GENERATING STATION FROM COAL TO NATURAL GAS</b>	<b>§ § § § § § §</b>	<b>BEFORE THE STATE OFFICE  OF  ADMINISTRATIVE HEARINGS</b>
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**SOUTHWESTERN PUBLIC SERVICE COMPANY'S  
SECOND SUPPLEMENTAL RESPONSE TO SIERRA CLUB'S  
FIRST REQUEST FOR INFORMATION  
QUESTION NO. 1-5(d, e)**

*(Filename: SPSResp1stSupp02.doc; Total Pages: 9)*

<b>I. WRITTEN RESPONSES .....</b>	<b>2</b>
<b>II. INSPECTIONS. ....</b>	<b>3</b>
<b>RESPONSES .....</b>	<b>5</b>
<b>QUESTION NO. SIERRA CLUB 1-5:.....</b>	<b>5</b>
<b>CERTIFICATE OF SERVICE .....</b>	<b>6</b>
<b>EXHIBITS ATTACHED:</b>	
SPS-Sierra Club 1-5(d,e)(SUPP 02) .....	7

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

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

**SOUTHWESTERN PUBLIC SERVICE COMPANY'S  
SECOND SUPPLEMENTAL RESPONSE TO SIERRA CLUB'S  
FIRST REQUEST FOR INFORMATION  
QUESTION NO. 1-5(d, e)**

Southwestern Public Service Company ("SPS") files this supplemental response to the Sierra Club's First Request for Information, Question No. 1-5(d, e). SPS has provided notice, by email, to all parties that SPS's Supplemental 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](mailto: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. Sierra Club 1-5:**

For the Harrington units:

- a. Please produce any unit replacement studies done by the Company.
- b. Identify any transmission grid updates or changes that would be needed to allow for the retirement of any of the units.
- c. Produce any analysis or assessment of the need for the continued operations of each unit.
- d. Provide the remaining book value (plant balance) at the start of 2021.
- e. Identify the current undepreciated book value, and the expected undepreciated book value for each year of the remaining operation life of the unit.
- f. Produce any analysis or assessment of the impact that retirement of each unit would have on capacity adequacy, transmission grid stability, transmission grid support, voltage support, or transmission system reliability.

### **JANUARY 13, 2022 SUPPLEMENTAL RESPONSE:**

The following supplements SPS's initial response to Sierra Club RFI 1-5(d) and (e) filed on November 10, 2021. Please refer to Exhibit SPS-Sierra Club 1-5(d,e)(SUPP 02).

Preparers: Sean Young, Ben R. Elsey  
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 January 13, 2022, in accordance with the Order Suspending Rules, issued in Project No. 50664.

  
\_\_\_\_\_  
Mark A. Santos

Unit	Asset Classification	Proposed Retirement Year (c)	SC 1-5.d	SC 1-5.e				
			Plant Balance					
			1/1/2021	1/1/2021	1/1/2022	1/1/2023	1/1/2024	1/1/2025
Harrington Unit 1	Coal	2024	22,536,171	10,343,423	9,662,956	8,982,490	8,302,023	
Harrington Unit 2	Coal	2024	21,549,344	10,393,720	9,791,720	9,111,253	8,430,787	
Harrington Unit 3	Coal	2024	21,720,678	10,272,587	9,727,393	9,046,926	8,366,460	
Harrington Common	Coal	2024	7,897,767	5,035,675	4,805,232	4,124,766	3,444,300	
Harrington Unit 1	Gas	2036	145,963,109	69,836,372	65,376,898	60,917,424	56,457,951	51,998,477
Harrington Unit 2	Gas	2038	163,571,000	83,079,660	78,323,689	73,567,719	68,811,748	64,055,777
Harrington Unit 3	Gas	2040	169,361,133	84,761,621	80,486,747	76,211,874	71,937,000	67,662,126
Harrington Common	Gas	2040	41,809,209	22,198,379	21,012,488	19,826,596	18,640,704	17,454,812
			\$ 594,408,411	\$ 295,921,437	\$ 279,187,123	\$ 261,789,048	\$ 244,390,972	\$ 201,171,192
								\$ 186,494,982

(a) Undepreciated Net Book Value excludes Land Owned (non-depreciable)

(b) Negative undepreciated Net Book Values represent instances where the plant investment depreciation reserve plus the cost of removal reserve exceeds the historical cost of the plant investment.

(c) SPS has assumed that a year after the proposed retirement year that the plant will be retired and dismantling activities will conclude, resulting in a zero undepreciated Net Book Value.



Unit	Asset Classification	Proposed Retirement Year (c)	Undepreciated Plant Balance						
			1/1/2027	1/1/2028	1/1/2029	1/1/2030	1/1/2031	1/1/2032	1/1/2033
Harrington Unit 1	Coal	2024							
Harrington Unit 2	Coal	2024							
Harrington Unit 3	Coal	2024							
Harrington Common	Coal	2024							
Harrington Unit 1	Gas	2036	43,079,530	38,620,056	34,160,582	29,701,109	25,241,635	20,782,161	16,322,688
Harrington Unit 2	Gas	2038	54,543,835	49,787,864	45,031,893	40,275,922	35,519,951	30,763,980	26,008,010
Harrington Unit 3	Gas	2040	59,112,379	54,837,505	50,562,631	46,287,758	42,012,884	37,738,010	33,463,136
Harrington Common	Gas	2040	15,083,029	13,897,137	12,711,245	11,525,354	10,339,462	9,153,570	7,967,678
			\$ 171,818,772	\$ 157,142,562	\$ 142,466,352	\$ 127,790,142	\$ 113,113,932	\$ 98,437,722	\$ 83,761,512

(a) Undepreciated Net Book Value excludes Land Owned (non-depreciable)

(b) Negative undepreciated Net Book Values represent instances where the plant investment depreciation reserve plus the cost of removal reserve exceeds the historical cost of the plant investment.

(c) SPS has assumed that a year after the proposed retirement year that the plant will be retired and dismantling activities will conclude, resulting in a zero undepreciated Net Book Value.

Unit	Asset Classification	Proposed Retirement							
		Year (c)	1/1/2034	1/1/2035	1/1/2036	1/1/2037	1/1/2038	1/1/2039	1/1/2040
Harrington Unit 1	Coal	2024							
Harrington Unit 2	Coal	2024							
Harrington Unit 3	Coal	2024							
Harrington Common	Coal	2024							
Harrington Unit 1	Gas	2036	11,863,214	7,403,740	2,944,267				
Harrington Unit 2	Gas	2038	21,252,039	16,496,068	11,740,097	6,984,126	2,228,155		
Harrington Unit 3	Gas	2040	29,188,263	24,913,389	20,638,515	16,363,641	12,088,768	7,813,894	3,539,020
Harrington Common	Gas	2040	6,781,787	5,595,895	4,410,003	3,224,111	2,038,220	852,328	(333,564)
			\$ 69,085,302	\$ 54,409,092	\$ 39,732,882	\$ 26,571,879	\$ 16,355,142	\$ 8,666,222	\$ 3,205,456

(a) Undepreciated Net Book Value excludes Land Owned (non-depreciable)

(b) Negative undepreciated Net Book Values represent instances where the plant investment depreciation reserve plus the cost of removal reserve exceeds the historical cost of the plant investment.

(c) SPS has assumed that a year after the proposed retirement year that the plant will be retired and dismantling activities will conclude, resulting in a zero undepreciated Net Book Value.

The following files are not convertible:

Exhibit SPS-Sierra Club 1-  
5(d,e) (SUPP2).xlsx

Please see the ZIP file for this Filing on the PUC Interchange in order to access these files.

Contact [centralrecords@puc.texas.gov](mailto:centralrecords@puc.texas.gov) if you have any questions.