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**APPLICATION OF ENTERGY
TEXAS, INC. FOR AUTHORITY TO
CHANGE RATES**

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**BEFORE THE STATE OFFICE
OF
ADMINISTRATIVE HEARINGS**

**SOUTHWESTERN PUBLIC SERVICE COMPANY'S
FIRST REQUEST FOR INFORMATION TO COMMISSION STAFF**

Southwestern Public Service Company ("SPS") requests the Staff of the Public Utility Commission of Texas ("Staff") fully respond to the attached set of requests for information ("RFIs") within five (5) working days, as required by 16 Tex. Admin. Code ("TAC") § 22.144 and SOAH Order.

Responses to these RFIs shall conform in all respects to the Commission's rules including the requirement in 16 Tex. Admin. Code § 22.144(c)(2)(F) that they be made under oath. Responses shall identify the preparer or person under whose direct supervision each response was prepared, and the sponsoring witness, if any. Each request shall be answered separately; responses shall be preceded by the request to which the answer pertains.

Any information responsive to and any questions regarding these requests should be directed to the undersigned.

Respectfully submitted,

/s/ MARK A. WALKER

XCEL ENERGY SERVICES INC.

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I. DEFINITIONS

The following definitions apply to each of the RFIs, instructions, and definition set forth in this document:

1. A reference to "SPS" or the "Company" shall mean Southwestern Public Service Company.
2. A reference to "Staff of the Public Utility Commission of Texas" ("Staff") refers to, for purposes of these RFIs, Staff and its employees, members, officers, directors, agents, attorneys, consultants, and all persons acting under contractual arrangements with or purporting to act on its behalf.
3. The term "Commission" refers to the Public Utility Commission of Texas.
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, electronic mail (e-mail), modem transfers, 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 TIEC.
5. "Documents" refers to all writings and records of every type, including e-mails or other electronic media, in the possession, control, or custody of TIEC. "Documents" shall also refer to copies of documents, even though the originals of those documents are not in the possession, custody, or control of TIEC, every copy of a document which contains handwritten or other notations or which otherwise does not duplicate the original or any other copy, and all attachments to any documents.
6. The term "e-mail" includes the entire string and all attachments found anywhere in the e-mail string.
7. The term "concerning" includes the following meanings: relating to; referring to; pertaining to; regarding; discussing; mentioning; containing; reflecting; evidencing; describing; showing; identifying; providing; disproving; consisting of; supporting; contradicting; in any way legally, logically, or factually connected with the matter to which the term refers; or having a tendency to prove or disprove the matter to which the term refers.

II. GENERAL INSTRUCTIONS.

The following General Instructions apply to each of the RFIs by SPS:

1. In providing your response to an RFI, please start each response to an RFI on a separate page and include the question to which you are responding. Please provide all responses through electronic service and include native versions of all attachments and exhibits.
2. For each responsive answer, please identify the individual(s) responsible for its preparation, and the witness sponsoring the answer provided.
3. If a data request can be answered in whole or in part by reference to the response to a preceding or subsequent data request, including data requests of Commission Staff and other parties, so indicate. Specify the preceding or subsequent data request by participant or party and by number, and state whether it is claimed that the response to the preceding or subsequent data request is a full response to the instant data request. If not, furnish the balance of the response needed to complete a full reply.
4. In the event any document requested in this request is unavailable, describe in detail the reasons the document is unavailable.
5. When an RFI requests copies of previously filed testimony, please provide either: (a) an electronic or paper copy of the testimony itself; or (b) sufficient information for SPS to retrieve the testimony from a publicly available source, including: (i) the jurisdiction in which the testimony was filed; (ii) the docket number of the proceeding in which the testimony was filed; (iii) the date the testimony was filed; and (iv) if available, an electronic link to the testimony itself, rather than just a link to the jurisdiction's website.
6. When producing documents pursuant to these RFIs, designate on the document or group of documents the RFI(s) in response to which the document(s) are produced.
7. If, in answering any of these RFIs, there is any ambiguity in interpreting either the request or a definition or instruction applied thereto, please contact Mark Walker at:

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If that is not possible, set forth the language deemed to be ambiguous and the interpretation chosen or used in responding to the request.

8. These data requests are continuing in nature and require supplemental responses when further or different information with respect to any of them is obtained.
9. Use of the singular or plural word form in a data request is not to be interpreted to exclude information or documents from the scope or intent of the specific request.
10. The terms "and" and "or" shall be construed either disjunctively or conjunctively whenever appropriate in order to bring within the scope of these requests any information or documents which might otherwise be considered to be beyond their scope.
11. If any document covered by this request is withheld for whatever reason, please furnish a list identifying all withheld documents in the following manner:
 - (a) the reason for withholding;
 - (b) the date of the document;
 - (c) a brief description of the document;
 - (d) the name of each author or preparer;
 - (e) the name of each person who received the document; and
 - (f) a statement constituting the basis for withholding the document.
12. If Staff declines to respond to any request for information or data on the basis of privilege, please state as to each such request an explanation for the refusal. Identify those documents and communications that are withheld from the response to each specific data request. The identification shall be served within the time specified by the presiding examiner for this proceeding and in accordance with the Rules of the Commission, and shall:
 - (a) specify the date of the document, its author(s) (with title and designation if an attorney), and recipients (with title and designation if an attorney);
 - (b) contain a brief summary of the subject matter of the document; and
 - (c) contain a brief statement of the reason that, in your opinion, the assertion of privilege is justified.
13. Please provide data responses as they become available.

III. REQUESTS FOR INFORMATION

The following requests pertain to the direct testimony of William Abbott

QUESTION NO. SPS-Staff 1-1:

Referencing page 8, lines 5 through 16, provide all analyses conducted or reviewed, materials reviewed, or other resources relied upon which establish that reasonable and adequate service in relation to electric vehicle charging infrastructure and equipment is being provided by the competitive market in Texas.

QUESTION NO. SPS-Staff 1-2:

Referencing page 8, lines 5 through 16, provide all analyses conducted or reviewed, materials reviewed, or other resources relied upon which establish that reasonable and adequate service in relation to electric vehicle charging and infrastructure and equipment is being provided or is planned to be provided by the competitive market in rural and low/moderate income counties in Texas.

QUESTION NO. SPS- Staff 1-3:

Please provide all analyses conducted or reviewed, materials reviewed, or other resources relied upon which establish that utility ownership of electric vehicle charging infrastructure and equipment precludes competitive market investment in similar equipment.

QUESTION NO. SPS-Staff 1-4:

Referencing page 7, lines 14 through 17, provide the definition of transportation electrification and charging infrastructure as used by Mr. Abbott in his testimony.

QUESTION NO. SPS-Staff 1-5:

Is it Mr. Abbott's position that ownership by the vertically integrated utility of the distribution equipment necessary to supply service to a third-party owned electric vehicle charging station (Electric Vehicle Supply Infrastructure (EVSI)) is inappropriate? If the answer is anything other than no, please provide a full explanation.

QUESTION NO. SPS-Staff 1-6:

Referencing pages 9 and 10, starting at line 13, is it Mr. Abbott's position that bad debt, or uncollectible expense, related to electric vehicle charging infrastructure or transportation electrification infrastructure should be treated differently than other bad debt/uncollectible expense incurred by the utility?

CERTIFICATE OF SERVICE

I certify that on the 3rd day of November 2022, a true and correct copy of the foregoing instrument was served on all parties of record by electronic service.

/s/ Jeremiah W. Cunningham