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Received - 2022-11-22 12:12:18 PM
Control Number - 53719
ItemNumber - 377

**SOAH DOCKET NO. 473-22-04394
DOCKET NO. 53719**

**APPLICATION OF ENTERGY TEXAS, § BEFORE THE STATE OFFICE OF
INC. FOR AUTHORITY TO CHANGE §
RATES § ADMINISTRATIVE HEARINGS**

**SOUTHWESTERN PUBLIC SERVICE COMPANY'S
RESPONSE TO OFFICE OF PUBLIC UTILITY COUNSEL'S
FIRST REQUEST FOR INFORMATION
QUESTION NOS. 1-1 THROUGH 1-5
(Filename: SPSRespOPUC1st.doc; Total Pages: 10)**

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Southwestern Public Service Company ("SPS") files this response to the Office of Public Utility Counsel's ("OPUC") First Request for Information, Question Nos. 1-1 through 1-5. In accordance with the Commission's *Order Suspending Rules* entered in Docket No. 50664, SPS has provided notice, by email, to all parties that SPS's Responses to OPUC's First 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 OPUC'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©(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

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*Southwestern Public Service Company's Response to
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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. 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 Amarillo, Texas, unless otherwise indicated. SPS requests that parties wishing to inspect this material provide at least 48-hour notice of their intent by contacting Mark A. Walker at Xcel Energy, Inc. at 919 Congress Avenue, Suite 900, Austin Texas 78701; telephone number (512) 236-6926; facsimile transmission number (512) 236-6935; email address mark.a.walker@xcelenergy.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,

XCEL ENERGY SERVICES INC.

Mark A. Walker

State Bar No. 20717318

XCEL ENERGY SERVICES INC.

919 Congress Ave., Ste. 900

Austin, Texas 78701-2471

Office: (512) 236-6923

Facsimile: (512) 236-6935

email: mark.a.walker@xcelenergy.com

By: Mark A. Walker

RESPONSES

QUESTION NO. OPUC 1-1:

Please refer to the Direct Testimony of Jeremiah W. Cunningham at 22:1 – 19. Please provide SPS’s calculations of the Herfindahl-Hirschman Index (“HHI”) for the DC fast charging market in Texas and all workpapers in functioning electronic format.

RESPONSE:

Please refer to the workpapers of Jeremiah W. Cunningham filed in this docket on October 27, 2022.

Preparer: Jeremiah W. Cunningham

Sponsor: Jeremiah W. Cunningham

QUESTION NO. OPUC 1-2:

Please refer to the Direct Testimony of Jeremiah W. Cunningham at 22:1 – 19. Has Mr. Cunningham or SPS performed calculations of the HHI for the DC fast charging market in ETI's service area? If so, please provide the calculations and all workpapers in functioning electronic format.

RESPONSE:

No. The HHI study provided in Mr. Cunningham's testimony only evaluated the entirety of the Texas market.

However, using the tools provided by the U.S. Department of Energy through the Energy Efficiency & Renewable Energy Alternative Fuels Data Center the lack of public Direct Current Fast Charging (DCFC) stations in the Entergy Texas, Inc. service territory can easily be observed.

The data can be accessed using this link: [Alternative Fuels Data Center: Alternative Fueling Station Locator \(energy.gov\)](https://energy.gov/eere/alternative-fuels/data-center/alternative-fueling-station-locator).

Preparer: Jeremiah W. Cunningham
Sponsor: Jeremiah W. Cunningham

QUESTION NO. OPUC 1-3:

Please refer to the Direct Testimony of Jeremiah W. Cunningham at 22:1 – 19. Please provide a detailed explanation of Mr. Cunningham's responsibilities for performing or approving the HHI calculations discussed in this section of his direct testimony.

RESPONSE:

Mr. Cunningham was not responsible for completing the HHI calculations or analysis. The HHI calculations and analysis were completed by the Chief of Staff & Enterprise Project Management Office within Xcel Energy, Inc. The Chief of Staff & Enterprise Project Management Office has extensive background in completing similar analysis. Mr. Cunningham reviewed the results of the HHI calculation and analysis and presented those results in his testimony.

Preparer: Ben Crist; Charlotte Hough

Sponsor: Jeremiah W. Cunningham

QUESTION NO. OPUC 1-4:

Please refer to the Direct Testimony of Jeremiah W. Cunningham at 22:1 – 19. Please identify all dockets or cases in which Mr. Cunningham has provided expert testimony concerning HHI, market concentration or the competitive intensity of an industry that was accepted by any regulatory authority. For each piece of expert testimony, please provide a detailed description of Mr. Cunningham's testimony concerning HHI, market concentration or the competitive intensity of an industry.

RESPONSE:

Mr. Cunningham has not previously testified on the subjects of HHI, market concentration, or the competitive intensity of an industry.

Preparer: Jeremiah W. Cunningham
Sponsor: Jeremiah W. Cunningham

QUESTION NO. OPUC 1-5:

Please refer to the Direct Testimony of Jeremiah W. Cunningham at 26:16 – 17. Please provide all market research, surveys and results, and any other analysis in Mr. Cunningham's or SPS's possession that identifies the confidence customers have in either SPS, ETI or U.S. electric utilities that supports the statement that customers consider utilities to be trusted energy advisors or reliable sources for EV information.

RESPONSE:

Xcel Energy's experience in other states has indicated high customer satisfaction with EV charging programs. Page 24 of the Annual Report submitted to the Minnesota Public Utilities Commission in Docket No. E002/M-15-111 notes a customer satisfaction score of 96 percent based on a survey of 73 participants. Satisfaction with the upfront experience such as Ease of Enrollment, Information about Program Costs, and How the Program Works all scored in the 96 percent or higher range. Satisfaction with Communication from Xcel Energy scored 92 percent. When participants were asked if they would refer EV Subscription Pilot program to a friend, 90 percent responded that they are highly likely to recommend it. (MN 2022 Annual EV Report (2).pdf)

Preparer: Patrick Witterschein, Evan Kimber
Sponsor: Jeremiah W. Cunningham

CERTIFICATE OF SERVICE

I certify that on the 22nd day of November 2022, a true and correct copy of the foregoing instrument was served on all parties of record by electronic service and by either hand-delivery, Federal Express, regular first class mail, certified mail, or facsimile transmission.

/s/ Jeremiah W. Cunningham