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Filing Date - 2024-06-03 10:53:46 AM

Control Number - 56570

Item Number - 16

**SOAH DOCKET NO. 473-24-17666
PUC DOCKET NO. 56570**

APPLICATION OF SOUTHWESTERN	§	BEFORE THE STATE OFFICE
PUBLIC SERVICE COMPANY TO	§	OF
ADJUST ITS ENERGY EFFICIENCY	§	
COST RECOVERY FACTOR	§	ADMINISTRATIVE HEARINGS

**COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION TO
SOUTHWESTERN PUBLIC SERVICE COMPANY
QUESTION NOS. STAFF 2-1 THROUGH STAFF 2-4**

Pursuant to 16 Texas Administrative Code (TAC) § 22.144 of the Commission's Procedural Rules, the Staff (Staff) of the Public Utility Commission of Texas (Commission) requests that Southwestern Public Service Company by and through its representative of record, provide the following information and answer the following questions under oath. The questions shall be answered in sufficient detail to fully present all of the relevant facts, within the time limit provided by the Presiding Officer or within 20 days if the Presiding Officer has not provided a time limit. Please copy the question immediately above the answer to each question. These questions are continuing in nature, and if there is a relevant change in circumstances, submit an amended answer, under oath, as a supplement to your original answer. State the name of the witness in this cause who will sponsor the answer to the question and can vouch for the truth of the answer.

Provide responses to the Requests for Information by filing with the Commission solely through the Interchange on the Commission's website and provide notice, by email, to all other parties that the pleading or document has been filed with the Commission, unless otherwise ordered by the presiding officer pursuant to the Second Order Suspending Rules in Project No. 50664.

Dated: June 3, 2024

Respectfully submitted,

**PUBLIC UTILITY COMMISSION OF TEXAS
LEGAL DIVISION**

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Phillip Lehmann
Managing Attorney

/s/ Markel Perkins
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CERTIFICATE OF SERVICE

I certify that unless otherwise ordered by the presiding officer, notice of the filing of this document will be provided to all parties of record via electronic mail on June 3, 2024 in accordance with the Second Order Suspending Rules, filed in Project No. 50664.

/s/ Markel Perkins
Markel Perkins

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DEFINITIONS

- 1) "SPS" or "you" refers to Southwestern Public Service Company and any person acting or purporting to act on their behalf, including without limitation, attorneys, agents, advisors, investigators, representatives, employees, or other persons.
- 2) "Document" includes any written, recorded, or graphic matter, however produced or reproduced, including but not limited to correspondence, telegrams, contracts, agreements, notes in any form, memoranda, diaries, voice recording tapes, microfilms, pictures, computer media, work papers, calendars, minutes of meetings or other writings or graphic matter, including copies containing marginal notes or variations of any of the foregoing, now or previously in your possession. In the event any documents requested by this Request for Information have been transferred beyond your control, describe the circumstances under which the document was destroyed or transferred and provide an exact citation to the subject document. In the event that documents containing the exact information do not exist, but documents do exist which contain portions of the required information or which contain substantially similar information, then the definition of "documents" shall include the documents which do exist, and these documents will be provided.

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INSTRUCTIONS

- 1) Pursuant to 16 TAC § 22.144(c)(2), Staff requests that answers to the requests for information be made under oath.
- 2) Please copy the question immediately above the answer to each question. State the name of the witness in this cause who will sponsor the answer to the question and can vouch for the truth of the answer.
- 3) These questions are continuing in nature, and if there is a relevant change in circumstances, submit an amended answer, under oath, as a supplement to your original answer.
- 4) Words used in the plural shall also be taken to mean and include the singular. Words used in the singular shall also be taken to mean and include the plural.
- 5) The present tense shall be construed to include the past tense, and the past tense shall be construed to include the present tense.
- 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 or copies, subject matter of the document, and the basis upon which such privilege is claimed.
- 7) Pursuant to 16 TAC § 22.144(h)(4), if the response to any request is voluminous, please provide a detailed index of the voluminous material.
- 8) Staff requests that each item of information be made available as it is completed, rather than upon completion of all information requested.

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Staff 2-1 Please refer to SPS's current application to adjust its Energy Efficiency Cost Recover Factor (Application), specifically Grant Gervais' Direct Testimony on page 34. With regard to Mr. Gervais' testimony please provide copies of the work orders for all affiliate expenses included in SPS's current energy efficiency cost recovery factor (EECRF) application.

In responding to this request, please ensure the inclusion of the following information:

- a) a list of all expenses by Federal Energy Regulatory Commission (FERC) account/sub-account; and
- b) for each work order:
 - i. a detail of the expenses by class of service;
 - ii. the scope of work with a statement of the purpose;
 - iii. the primary activities, products or deliverables; and
 - iv. the justification for the billing method.

Staff 2-2 Does SPS's requested EECRF affiliate expenses include amounts for carrying charges on shared assets? If so, please separate the amounts for carrying charges on shared assets as follows:

- a) depreciation amount;
- b) expenses amount;
- c) equity amount; and
- d) interest amount.

Staff 2-3 Please provide the date when the most recent market compensation study was performed by SPS.

Staff 2-4 Does SPS' EECRF request include any amount of financially based incentive compensation for an officer of SPS? If the answer is "yes," please provide the following information:

- a) The amount in the EECRF request related to financially based incentive compensation, by FERC account.
- b) Refer to the response at Staff 1-4(a). Please break out the identified amount as follows:
 - i. by the reconciled year;
 - ii. by current program year; and
 - iii. by estimated program year.