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DOCKET NO. 56921

**APPLICATION OF SOUTHWESTERN §
PUBLIC SERVICE COMPANY TO §
AMEND ITS INTERRUPTIBLE §
CREDIT OPTION TARIFF, AND FOR § PUBLIC UTILITY COMMISSION
APPROVAL OF A SOUTHWEST § OF TEXAS
POWER POOL INTEGRATED §
MARKETPLACE DEMAND §
RESPONSE OPTION TARIFF AND §
AN OFF-PEAK ALTERNATE RIDER §**

**SOUTHWESTERN PUBLIC SERVICE COMPANY'S
RESPONSE TO TEXAS INDUSTRIAL ENERGY CONSUMERS
SECOND REQUEST FOR INFORMATION
QUESTION NO. 2-1**

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Southwestern Public Service Company (“SPS”) files this response to the Texas Industrial Energy Consumers (“TIEC”) Second Request for Information, Question No. 2-1. 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 TIEC’s Second 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 Second 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 98 San Jacinto Boulevard, Suite 1600, Austin, Texas 78701; telephone number (512) 721-2700. Voluminous exhibits will also be provided on SPS’s file sharing platform.

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 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 Jeffrey Stuart at Eversheds

Sutherland (US) L.L.P., 98 San Jacinto Boulevard, Suite 1600, Austin, Texas 78701; telephone number (512) 721-2700; facsimile transmission number (512) 721-2656; email address jeffreystuart@eversheds-sutherland.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,

/s/ Stephanie G. Houle

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ATTORNEYS FOR
SOUTHWESTERN PUBLIC SERVICE COMPANY

RESPONSES

QUESTION NO. TIEC 2-1:

Please reconcile the Southwest Power Pool (SPP) seasonal Planning Reserve Margins shown in the Direct Testimony of Richard Lain, page 15, lines 3-5 (16% for summer and 36% for winter), with the Planning Reserve Margins used for Line 5 (Rows 7, 17, 27 and 37) in each of the tables in Attachment RL-3 - Load & Resource Tables (4.69% for summer and 15.3% for winter).

RESPONSE:

The 16% and 36% values are based on installed nameplate capacity ("ICAP"), whereas 4.69% and 15.3% reflect adjustments to the Planning Reserve Margins ("PRM") to account for performance-based accreditation of thermal units calculated and provided by SPP for SPS's specific units. These values are defined as the accredited capacity ("ACAP") PRM. The ACAP PRM will change from year-to-year based on various factors specific to unit performance and class average performances across SPP. SPP is currently in the process of finalizing specific inputs and as such, these values will likely change again before their implementation in 2026.

Preparer: Justin Gable
Sponsor: Richard Lain

CERTIFICATE OF SERVICE

I certify that on the 9th day of October 2024, notice of the filing of the foregoing instrument with the PUCT was served on all parties of record by electronic service.

/s/ Scottie Agnew
Scottie Agnew