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**SOAH DOCKET NO. 473-25-18477
PUC DOCKET NO. 58017**

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

**COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION TO
SOUTHWESTERN PUBLIC SERVICE COMPANY
QUESTION NOS. STAFF 2-1 THROUGH 2-6**

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 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: May 13, 2025

Respectfully submitted,

**PUBLIC UTILITY COMMISSION OF TEXAS
LEGAL DIVISION**

Marisa Lopez Wagley
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Senior Managing Attorney

/s/ Tyler Xu
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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 May 13, 2025, in accordance with the Second Order Suspending Rules, issued in Project No. 50664.

/s/ Tyler Xu
Tyler Xu

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DEFINITIONS

- 1) "You," "SPS," and/or "Southwestern Public Service Company" 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** Refer to Attachment PGG-3.
- a. Step 1 Fixed Inputs Tab; please indicate the docket/item number for the rate proceeding where the Utility Specific Discount Rate (WACC) was determined.
 - b. EECRF Templates Tab; please label the table with appropriate program year date.
- Staff 2-2** Refer to Attachment PGG-5.
- a. Please provide total with formula intact.
- Staff 2-3** Refer to Attachment PGG-7(CONF) workpaper, regarding program funding for calendar year 2024.
- a. Please provide invoices and contracts for all 2024 administrative expenses included in the application.
 - b. Please provide, in Excel format with formulas intact, a detailed breakdown and summary of the internal administrative costs included in the application including totals.
 - i. Please itemize expenses for General Administration as listed on Table 11, cell E20.
 - c. Please provide invoices and contracts for all 2024 research and development expenses included in the application.
 - d. Please provide, in Excel format with formulas intact, a detailed breakdown and summary of internal research and development costs included in the application including totals.
- Staff 2-4** Refer to Attachment PGG-7(CONF) workpaper, regarding proposed annual budget for 2026.
- a. Please provide, in Excel format with formulas intact, a detailed breakdown of the proposed administrative costs included in the application.

- b. Please provide, in Excel format with formulas intact, a detailed breakdown of the proposed research and development costs included in the application.
- c. Please provide all applicable contracts for research and development and administrative costs included in the application.

Staff 2-5 Refer to Attachment MFL-2. Please provide this document with formulas intact.

Staff 2-6 Refer to the SPS application to adjust its Energy Efficiency Cost Recovery Factor (EECRF), specifically, Direct Testimony by Grant Gervais:

- a. On page 32, please provide Table PGG-3 in Excel format with formulas intact.
- b. On page 33, please provide Table PGG-4 in Excel format with formulas intact.
- c. On pages 34-41 regarding affiliate costs:
 - i. On page 35, please provide Table PGG-5 in Excel format with formulas intact, itemizing each expense.
 - ii. Please provide copies of the work orders for all affiliate expenses included in the application, ensuring the inclusion of (as applicable):
 - 1. A list of all expenses by the Federal Energy Regulatory Commission (FERC) account/sub-account; and
 - 2. For each work order:
 - a. Detail of the expenses by class of service
 - b. Scope of work with a statement of the purpose
 - c. Primary activities, products or deliverables; and
 - d. Justification for the billing method.