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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 §**

**SOUTHWESTERN PUBLIC SERVICE COMPANY'S
RESPONSE TO COMMISSION STAFF'S
FIFTH REQUEST FOR INFORMATION
QUESTION NOS. 5-1 THROUGH 5-4**

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RESPONSE TO COMMISSION STAFF'S
FIFTH REQUEST FOR INFORMATION
QUESTION NOS. 5-1 THROUGH 5-4**

Southwestern Public Service Company ("SPS") files this response to Commission Staff's ("Staff") Fifth Request for Information, Question Nos. 5-1 through 5-4.

I. WRITTEN RESPONSES

SPS's written responses to Staff's Fifth 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 will be provided by secure document transfer link.

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 materials will be served on all parties that have signed and filed certification under the protective order entered in this docket. Confidential and Highly Sensitive responsive documents will be provided by secure document transfer link.

Respectfully submitted,

By: /s/ Stephanie Green

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III. RESPONSES

QUESTION NO. STAFF 5-1:

Southwestern Public Service Company (SPS) conducted two scheduled curtailments for its Commercial Load Management Standard Offer Program (LM SOP) during Program Year 2024 (PY2024).

- a. Please explain in detail how SPS chose the specific dates and times for each of the curtailments.
- b. Please explain in detail why SPS chose the specific dates and times for each of the curtailments.
- c. Please include in the explanation for each curtailment any triggering events, standardized processes, or other factors that SPS considered when conducting the curtailments.

RESPONSE:

- a. How SPS chose the specific dates and times for each of the scheduled test curtailments called in PY2024 was by working in partnership with the program energy efficiency service provider (EESP) to confirm participant availability and with SPS Commercial Operations to identify available dates and times by which decreased systems loads at each participant site would not significantly affect overall SPS system loads.

Test curtailments are considered “scheduled” events. Test curtailments are scheduled to validate participant controllable loads per program requirements to ensure that participants can curtail load to their enrolled reduction levels in the event of an actual curtailment. Actual curtailments are considered “unscheduled” events. An actual curtailment event may occur when SPS Commercial Operations determines that forecasted system loads are expected to exceed forecasted generation. This can most commonly occur during consecutive high temperature days during the control season.

- b. SPS chose the specific dates and times for each of the scheduled test curtailments called in PY2024 because no actual curtailment event had yet been required due to forecasted system loads expecting to exceed forecasted generation. In the absence of an actual curtailment, SPS is required to execute a test curtailment to validate controllable load

commitments at each participant site. In recent years, SPS has strived to schedule a test curtailment earlier in the control season to ensure participant controllable load will be available in the event of an actual curtailment later in the control season. The control season consists of the four summer months; June, July, August, and September, when daily temperatures are expected to reach their annual peaks. The PY2024 control season was from June 1st to September 30th. When scheduling test curtailments, SPS considers many factors, including but not limited to historical and current weather conditions, participant input, SPS staffing schedules, and SPS system loads and reliability. Generally speaking, SPS identifies a specific date and time that is a part of a multi-day stretch of warmer weather. An additional consideration is the availability of SPS staff, both in program operations, to dispatch the event notifications, as well as account representatives to assist with any participant concerns that may arise.

- c. Curtailment Event #1, June 26, 2024 – Test curtailment scheduled to validate participant controllable load per program requirements to ensure that participants could curtail load to their enrolled reduction levels in the event of an actual curtailment. SPS typically schedules a test curtailment towards the end of June. June 26th was a warm day as part of a stretch of warmer weather and 3 PM (CST) was determined to be the time of day when the system load would be near its peak with many participants operating at their full operational capacity, which would provide for a more accurate performance measurement of curtailment capabilities and controllable load validation.

Curtailment Event #2, August 29, 2024 – Additional test curtailment scheduled at the request of two participant sites. Both participant sites requested a retest to comply with program participant controllable load validation requirements. This test curtailment followed the same methodology used for the first test curtailment from June 26th.

Preparer: Joseph Koski
Sponsor: Michael L. Lewis

QUESTION NO. STAFF 5-2:

SPS provided detailed data summarizing savings for the 6 sites during the two curtailments in PY2024.

- a. Please provide the percentage of the customer sites with sustained load at the desired minimum for the entire duration of each curtailment event.
- b. Please indicate for each customer site for each curtailment event:
 - i. The amount of load requested to be curtailed;
 - ii. The requested duration for the curtailment;
 - iii. The amount of load actually curtailed; and
 - iv. The actual duration of load curtailment.

RESPONSE:

- a. 50% of the customer sites achieved their approved curtailment commitment.
- b. Please refer to Exhibit SPS-Staff 5-2.

Preparer: Joseph Koski
Sponsor: Michael F. Lewis

QUESTION NO. STAFF 5-3:

Please describe in detail how SPS selected the sponsors and customer sites for its PY2024 LM SOP.

RESPONSE:

The LM SOP program has a minimum participation level of 100 kW of controllable load during the control season. The control season consists of the four summer months; June, July, August, and September, when daily temperatures are expected to reach their annual peaks. The PY2024 control season was from June 1st to September 30th. Annual enrollment begins on April 1st of each calendar year. Approved applicants must sign contracts by the end of May prior to the start of control season. All program participant applications are reviewed on a first-come, first-served basis; however, SPS reserves the right to move an application up or down the priority list based on the quality of the proposed curtailable load, evaluation of the Project Sponsor's ability to implement curtailments, or other such reasonable factors as may be applied. Applications will be accepted for the program until all funds have been committed. Applications placed on the waiting list that are not accepted for a given program year will not be carried over into the next program year and must be resubmitted by the Project Sponsor. Project Sponsors from the prior year are required to submit a new application each year, but the application and contracting process will be simplified for returning participants.

Preparer: Joseph Koski
Sponsor: Michael F. Lewis

QUESTION NO. STAFF 5-4:

Please describe in detail how SPS determined the requirements for its PY2024 LM SOP, including any differences, and reasoning for such differences, in requirements from previous program years.

RESPONSE:

SPS works directly with an energy efficiency service provider (EESP) to review all program requirements and contract details on an annual basis prior to providing a copy of the program manual and contract to potential sponsors. All contracts must be signed by both program sponsors and an SPS representative prior to May 15th of each calendar year for the upcoming control season; June through September.

SPS carried over the same requirements as previous years for the 2024 program year with one exception. In 2024, SPS introduced a new rule that had sponsors who deliver average aggregate load reductions from all enrolled sites over the performance period totaling less than 70% of their committed curtailable load will receive 50% of the contracted incentive amount for the curtailed load delivered. This rule was introduced to incentivize participants to achieve their full commitment.

Preparer: Joseph Koski
Sponsor: Michael F. Lewis

CERTIFICATE OF SERVICE

I certify that, on the 30th day of June 2025, notice of the filing of the foregoing instrument with the PUCT was served on all parties of record by electronic service, in accordance with the Commission's *Fifth Order Suspending Rules* issued in Project No. 50664.



Curtailment 1 - 6/26/2024 15:00 - 16:00

Site Name	Requested Curtailment (kW)	Requested Duration	Actual Curtailment (kW)	Actual Duration
Customer Site #1	550	1 Hour	0	1 Hour
Customer Site #2	400	1 Hour	434.93	1 Hour
Customer Site #3	600	1 Hour	491.23	1 Hour
Customer Site #4	800	1 Hour	366.46	1 Hour
Customer Site #5	400	1 Hour	196.19	1 Hour
Customer Site #6	400	1 Hour	0	1 Hour

Curtailment 2 - 8/29/2024 15:00 - 16:00

Site Name	Requested Curtailment (kW)	Requested Duration	Actual Curtailment (kW)	Actual Duration
Customer Site #1	550	1 Hour	767.43	1 Hour
Customer Site #6	400	1 Hour	559.96	1 Hour

The following files are not convertible:

Staff 5th RFI Attachment 5-2.xlsx

Please see the ZIP file for this Filing on the PUC Interchange in order to access these files.

Contact centralrecords@puc.texas.gov if you have any questions.