BEFORE THE NEW MEXICO PUBLIC REGULATION COMMISSION

IN THE MATTER OF SOUTHWESTERN PUBLIC SERVICE COMPANY'S APPLICATION FOR: (1) REVISION OF ITS RETAIL RATES UNDER ADVICE NOTICE NO. 282; (2) AUTHORIZATION AND APPROVAL TO SHORTEN THE SERVICE LIFE OF AND ABANDON ITS TOLK GENERATING STATION UNITS; AND (3) OTHER RELATED RELIEF,	)	**CASE NO. 19-00170-UT**
SOUTHWESTERN PUBLIC SERVICE COMPANY,	)	
APPLICANT.	)	

DIRECT TESTIMONY

of

EVAN D. EVANS

on behalf of

SOUTHWESTERN PUBLIC SERVICE COMPANY

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GLOSSARY OF ACRONYMS AND DEFINED TERMS

Acronym/Defined Term	Meaning
Act	New Mexico Night Sky Protection Act, NMSA 1978, § 74-12-1 et seq.
AEP	American Electric Power Company
AL	Area Lighting
C&I	Commercial and Industrial
CCOSS	Class cost of service study
Commission or NMPRC	New Mexico Public Regulation Commission
CSW	Central and South West Corporation
EPE	El Paso Electric Company
FEA	Federal Executive Agencies, including Cannon Air Force Base
FERC	Federal Energy Regulatory Commission
Guernsey	C.H. Guernsey & Company
Hale Wind	Hale Wind Energy Project
kW	Kilowatt
kWh	Kilowatt-hour
kV	Kilovolt
kVar	Kilovolt Amperes Reactive
LGS-T	Large General Service – Transmission

Acronym/Defined Term	Meaning
LMS	Large Municipal and School Service
PUCT	Public Utility Commission of Texas
RFP	Rate Filing Package
ROR	Rate of Return
SL	Municipal Street Lighting
SMS	Small Municipal and School Service
SPS	Southwestern Public Service Company, a New Mexico corporation
Test Year	Historical Test Year Period, which consists of the Base Period (April 1, 2018 through March 31, 2019) and further incorporating all known and measurable changes
TOU	Time of Use
Xcel Energy	Xcel Energy Inc.

LIST OF ATTACHMENTS

Attachment	Description
EDE-1	Case No. 17-00255-UT Compliance Information on Experimental Time of Use Rates (*Filename:* Attachment EDE-1.xls)
EDE-2	Distribution of Revenue Increase by Class (*Filename:* Attachment EDE-2.xls)
EDE-3	Comparison of Relative RORs at Present and Proposed (*Filename:* Attachment EDE-3.xlsx)
EDE-4	Proof of Revenue at Proposed Rates (*Filename:* Attachment EDE-4.xlsx)
EDE-5	Rate Comparison – Present vs. Proposed Rates (*Filename:* Attachment EDE-5.xlsx)
EDE-6	Rate Design Workpapers (*Filename:* EDE RD Attachments.xlsx) (*Various Files on CD included in Attachment WAG-1(CD) to the Direct Testimony of William A. Grant*)

Case No. 19-00170-UT
Direct Testimony
of
Evan D. Evans

I. WITNESS IDENTIFICATION AND QUALIFICATIONS

Q. Please state your name and business address.

A. My name is Evan D. Evans. My business address is 790 South Buchanan Street, Amarillo, Texas 79101.

Q. On whose behalf are you testifying in this proceeding?

A. I am filing testimony on behalf of Southwestern Public Service Company, a New Mexico corporation ("SPS") and wholly-owned electric utility subsidiary of Xcel Energy Inc. ("Xcel Energy").

Q. By whom are you employed and in what position?

A. I am employed by SPS as Director – Regulatory and Pricing Analysis.

Q. Please briefly outline your responsibilities as Director – Regulatory and Pricing Analysis.

A. My responsibilities include:

- developing and implementing SPS's regulatory program to support Xcel Energy's corporate objectives and to ensure SPS fulfills all legal and regulatory requirements of the New Mexico Public Regulation Commission ("Commission" or "NMPRC"), the Public Utility Commission of Texas ("PUCT"), and the Federal Energy Regulatory Commission ("FERC");
- directing the development and execution of all regulatory case filings before both state commissions and the FERC;

- directing regulatory activities that establish and maintain state and federal commission relationships and overseeing the administration of regulatory rules and procedures; and
- providing regulatory support for SPS's participation in the Southwest Power Pool.

Q. Please summarize your educational and professional background.

A. I graduated from Texas Tech University with a Bachelor of Business Administration degree in Finance in May 1980.

Upon graduation, I was employed as a Rate Analyst at West Texas Utilities Company, a wholly-owned subsidiary of Central and South West Corporation ("CSW"), which was acquired by American Electric Power Company ("AEP") in June 2000. During my 20-year career with CSW and AEP, I held a variety of professional analytical, consultant, and management positions in the rates, regulatory services, load research, and marketing, and business development areas.

In October 2000, I joined C.H. Guernsey & Company ("Guernsey"), which is an employee-owned, professional consulting firm offering engineering, architectural, economic, and construction management services to utilities, industries, and government agencies throughout the United States and internationally. While employed with Guernsey, I managed the firm's Dallas regional office and served as a consultant to electric utility industry clients in a

variety of areas, including regulatory compliance, integrated resource planning, electric utility cost of service issues, rate studies, financial analysis, economic feasibility analysis, retail electric choice, and wholesale power supply contract negotiations.

In September 2006, I left Guernsey and accepted the position of Director-Regulatory Services with El Paso Electric Company ("EPE"). I was promoted to Assistant Vice President-Regulatory Services and Rates in July 2008. While at EPE, I established the company's Regulatory Case Management and Energy Efficiency & Utilization departments. My responsibilities included direction of the company's Energy Efficiency & Utilization, Economic & Rate Research, Regulatory Case Management, and Regulatory Accounting departments and their associated missions.

In January 2014, I began my employment with Xcel Energy as Regional Vice President – Rates and Regulatory Affairs for SPS. In March 2017, I became Director – Regulatory and Pricing Analysis for SPS.

Q. Have you testified before any regulatory authorities?

A. Yes. I have testified in numerous cases or dockets and on a variety of subjects before the Commission, the PUCT, the Georgia Public Service Commission, and

the Oklahoma Corporation Commission. I have also submitted testimony before the FERC.

II. ASSIGNMENT AND SUMMARY OF TESTIMONY AND RECOMMENDATIONS

Q. What is your assignment in this phase of the case?

A. I support SPS's proposed revenue distribution and rate design and sponsor the proposed rate tariffs. Specifically, I will:

(1) introduce the other SPS witnesses in the Rate Design phase of this case;

(2) set out the specific relief that SPS is requesting of the Commission regarding the issues in the Rate Design phase of this case;

(3) discuss SPS's compliance with the rate design requirements from NMPRC Case No. 17-00255-UT;

(4) describe SPS's proposed distribution of the revenue requirement among the rate classes and present the proof of revenue for the proposed rates;

(5) explain how SPS has designed the rates necessary to recover the revenue requirement;

(6) describe the proposed revisions to SPS's New Mexico retail rule and rate tariffs: and

(7) I sponsor or co-sponsor the Rate Filing Package ("RFP") schedules set forth in Table EDE-1.

Table EDE-1
RFP Schedules

Schedule	Description	Co-Sponsor(s)
A-2	Summary of the Revenue Increase or Decrease at the Proposed Rates by Rate Classes	None

N-1	Rate of Return by Rate Classification	Richard M. Luth
O-1	Total Revenue Requirements by Rate Classification	None
O-2	Proof of Revenue Analysis	None
O-3	Comparison of Rates for Service Under the Present and Proposed Schedules	None
O-4	Explanation of Proposed Changes to Existing Rate Schedules	None

Q. Please summarize your testimony and recommendations.

A. Using the class cost of service study ("CCOSS") developed by SPS witness Richard M. Luth, I developed the proposed base revenue increases among the New Mexico retail customer classes in order to generally move classes toward the calculated cost of providing service to that class, balanced by consideration of increases that are somewhat higher or lower than the system average. Specifically, SPS's proposed revenue increase distribution was developed with target non-fuel base rate increases that were based on the following goals:

- the proposed Rate of Return ("ROR") for all classes will move closer to the system average ROR;
- the proposed rate increases for all individual classes, except for Residential Service, Residential Heating Service and Irrigation Power Service classes were developed on the basis that no class will receive less than 60% of the proposed New Mexico average percentage total

bill increase and no class will receive more than 140% of the average percentage total bill increase; and

- a maximum proposed increase of 125% of the New Mexico average percentage total bill increase was established for the Residential Service, Residential Heating Service and Irrigation Power Service classes.

These guidelines produced a range of increases of 3.41% to 7.74% on total bills and 7.15% to 34.04% on base rates.

In addition, the individual rates are designed so that the rates for each class will adequately recover the proposed revenue requirement by customer class and the rates will provide rational price signals to customers. I recommend that the Commission approve the proposed rate design.

I am also presenting SPS's proposal that all of the Time of Use ("TOU") rate options be made permanent rate options. TOU rate options provide prices that vary according to the time of day, season, and day type (weekday or weekend). Higher prices are charged during the system's peak demand hours during summer weekday afternoons. Lower prices are charged during off-peak or lower system demand hours.

I am also presenting certain rate tariff revisions that are necessary to implement new policies and to eliminate unused rate options. I recommend the Commission approve these rate tariff revisions.

Finally, I present SPS's minor changes to the Rule No. 16 – Extension to Customers in the Rules and Regulations. I recommend the Commission approve the proposed revisions to Rule No. 16.

Q. Are you the only SPS witness testifying on cost allocation and rate design in this proceeding?

A. No, two additional SPS witnesses testify on cost allocation and rate design issues.

Richard M. Luth:

1. explains how SPS derived the jurisdictional allocators that are used to allocate costs among SPS's three jurisdictions: New Mexico retail, Texas retail, and wholesale, which is regulated by FERC;

2. describes the adjustments SPS made to Test Year[1] customer billing data, including the use of year-end customer counts;

3. explains the calculation of, and adjustments to, SPS's present revenues;

4. describes the CCOSS and explains how it is developed and used to allocate costs among the customer classes, including the steps undertaken as part of that study to functionalize, classify, and allocate costs; and

5. describes SPS's Radial Line Study.

Jannell F. Marks:

1. describes SPS's load research function and the load research information that serves as the primary basis for the development of Test Year demand allocation factors; and

[1] The Test Year is the Historical Test Year Period consisting of the Base Period (April 1, 2018 through March 31, 2019) and further incorporating all known and measurable changes.

2. discusses the weather normalization of kilowatt-hour ("kWh") sales and system peaks.

Q. Were Attachments EDE-1 through EDE-6(CD) prepared by you or under your direct supervision and control?

A. Yes.

Q. Were the RFP schedules that you sponsor or co-sponsor prepared by you or under your direct supervision or control?

A. Yes.

Q. Do you incorporate the RFP schedules that you sponsor or co-sponsor into your testimony?

A. Yes.

III. COMPLIANCE WITH RATE DESIGN REQUIREMENTS FROM NMPRC CASE NO. 17-00255-UT FINAL ORDER

Q. What were the cost allocation and rate design compliance obligations that were established for SPS in the Final Order in SPS's last retail base rate case, NMPRC Case No. 17-00255-UT?

A. The following decretal paragraphs established cost allocation and rate design compliance obligations for SPS in the final order:

> L. When SPS files its next renewable portfolio plan, it shall propose to recover through its Renewable Energy Rider the cost of its renewable energy PPAs for which it uses the purchased energy to comply with the Renewable Portfolio Standard.
>
> M. Before SPS's (sic) files its next base rate case, it shall meet with FEA and LES (and all other parties shall be invited) for SPS to answer questions about how radial lines are allocated to New Mexico retail customers. SPS shall report on the results of this meeting in SPS's next base rate case filing.
>
> N. In its next base rate case filing, SPS shall report the following information regarding its Experimental Time of Use rates:
>
> 1. The number of participants in each rate class;
>
> 2. The number of the most customers who have participated in each rate class since implementation; and
>
> 3. For each customer who has participated in the program:
>
> a. the average cost per kWh under the TOU rate during the reporting period;
>
> b. the average cost per kWh if the customer were not subject to the TOU rate during the reporting period;

c. the total amount paid by each participant during the reporting period; and

d. the total amount that each participant would have paid during the reporting period had he not participated.

The reporting period for each customer shall begin with the customer's first bill under the TOU rate and end with the last available bill before SPS files its Application in its next base rate case. If a customer terminates participation before SPS files its Application in its next base rate case, the reporting period shall be the period of the customer's participation.

O. In its next base rate case filing, SPS shall either propose permanent TOU rates or explain why it does not propose permanent TOU rates.

P. Before filing its next base rate case, SPS shall perform a New-Mexico specific study that analyzes:

1. the reasonably determinable embedded and incremental costs to serve new interconnected customers;

2. the reasonably determinable benefits to the utility system provided by new interconnected customers during each three-year period after which the new interconnected customer rate riders take effect;

3. if applicable, whether the unavailability factors used in Rate Nos. 59 and 67 should be updated if applicable; and

4. if applicable, whether other changes should be made to cancelled Rate Nos. 59 and 67, including potential adjustments to the T&D Standby Charges.

Q. Within three months of issuance of a final order in this case, SPS shall meet with Staff and parties to discuss the depth of analysis and detail to contain in the study required by Decretal Paragraph P. SPS shall report on the results of this meeting and its New Mexico specific study in its next base rate case filing. Participants shall consider the merits of SPS conducting a value of solar study and ELCC study to comply with Section 62-13-13.2.

Q. What actions has SPS taken or will SPS take in response to the requirements in Decretal Paragraph L regarding renewable energy PPAs?

A. This issue was addressed in SPS's 2018 renewable portfolio plan filing, Case No. 18-00201-UT. In the final order in that case, the Commission determined, "the [Recommended Decision] RD was correct in recommending that SPS should be allowed to continue its dual recovery method in this case but should not be allowed to continue its dual recovery method when it is no longer procuring RECs beyond its RPS compliance requirement. . . ." *In the Matter of SPS's Application Requesting: (1) Acknowledgement of its Filing of the 2017 Annual Renewable Energy Portfolio Report. (2) Approval of its Annual Renewable Energy Portfolio Procurement Plan for Plan Year 2019; (3) Approval of the Proposed Rate for its 2019 Renewable Portfolio Standard Rider; (4) Approval of its Proposed Treatment of Renewable Energy Certificates Associated with the Sagamore and Hale Wind Facilities; and (5) Other Associated Relief*; NMPRC Case No. 18-00201-UT, Final Order at 9, Finding of Fact No. 15 (Dec. 12, 2018).

Q. What actions has SPS taken or will SPS take in response to the requirement in Decretal Paragraph M to meet with FEA and LES to answer questions

about how radial lines are allocated to New Mexico retail customers and to invite all other parties?

A. SPS held an initial meeting with representatives of FEA and LES to explain SPS's allocation of transmission radial lines among New Mexico retail customer classes on May 16, 2019. During that meeting I and other representatives of SPS explained the development of the Radial Line Study, the allocation of radial line investment and costs among New Mexico customer classes and discussed the transmission facilities serving Cannon Air Force Base and LES.

In that meeting, SPS responded to the confusion between transmission line extensions and transmission radial lines expressed in the testimony filed on behalf of FEA and LES in NMPRC Case No. 17-00255-UT. In addition, SPS explained the basis for the Line Extension provision of its Large General Service – Transmission ("LGS-T") tariff.

As part of that discussion, SPS explained that a transmission line extension is an extension of transmission facilities that operate at 60 kilovolts ("kV") or higher to serve a single transmission voltage customer. In contrast, for the purposes of SPS's assignment of transmission radial line costs, a radial line is a transmission line that is:

- operated at 60 kV or higher;
- owned and operated by SPS;
- is not operated as a loop and has only one power source; and
- is designed, operated and available to serve only SPS's retail customers or a single wholesale transmission customer, but not both.

On June 24, a conference call was conducted and all parties to NMPRC Case No. 17-00255-UT were invited to attend. On that conference call, SPS summarized the earlier meeting with FEA and LES and explained that SPS would continue to allocate transmission radial line investment based on the transmission radial line study. SPS also informed the participants on the conference call that it would not propose any modifications to the line extension provision contained in the LGS-T tariff.

Q. What actions has SPS taken or will SPS take in response to the requirements in Decretal Paragraph N regarding reporting on TOU rates?

A. Please see Attachment EDE-1 that contains all information required under Decretal Paragraph N regarding SPS's Experimental TOU rates.

Q. What actions has SPS taken or will SPS take in response to the requirements in Decretal Paragraph O regarding permanent TOU rates?

A. As discussed later in this testimony, SPS is proposing to make the TOU rates permanent rate options and to eliminate the maximum number of customers allowed to take service under the TOU rate options.

Q. What actions has SPS taken or will SPS take in response to the requirements in Decretal Paragraphs P and Q related to Rate Numbers 59 and 67?

A. All of the requirements in Decretal Paragraphs P and Q are triggered only if SPS decides to develop new standby rates. Because SPS is not proposing any new standby rates in this filing that would replace the Rates 59 and 67, which were rejected and eliminated by the Commission in NMPRC No. 17-00255-UT, the study requirements in Decretal Paragraphs P and Q are not applicable to this rate case.

SPS has installed interval data recorders on all interconnected customers, both at the point of service and on the customer-owned generation, that will enable SPS to perform the analyses and provide the required information if SPS elects to propose replacement standby rates in the future.

IV. REVENUE INCREASE DISTRIBUTION

Q. What topic do you discuss in this section of your testimony?

A. I describe SPS's proposed methodology for distributing the proposed revenue increases among the customer classes.

Q. What principles have you relied upon in deciding how to distribute the proposed revenue increases among the customer classes?

A. In order to reduce inter-class subsidies while moderating the impacts on classes that will receive increases that are somewhat higher or lower than the average, I have developed the proposed revenue increase distribution based on the following criteria:

1. the proposed ROR for individual classes will move closer to the system average ROR;

2. the proposed rate increases for all individual classes, except for Residential Service, Residential Heating Service and Irrigation Power Service classes were developed on the basis that no class will receive less than 60% of the proposed New Mexico average percentage total bill increase and no class will receive more than 140% of the average percentage total bill increase; and

3. a maximum proposed increase of 125% of the New Mexico average percentage total bill increase was established for the Residential Service, Residential Heating Service and Irrigation Power Service classes.

Q. Do you have an attachment showing the base rate increases and relative ROR by class?

A. Yes. Attachment EDE-2 shows the proposed base rate increases and ROR by class.

Q. Why does SPS's proposed revenue distribution not move each class to equalized ROR?

A. The CCOSS in a historical test year case reflects the composition of costs, customers and their associated energy usage and demands for that test year. Therefore, it reflects circumstances for a snapshot in time. However, it does not provide a complete picture that reflects the historical factors that led to the current total investment or composition of costs, nor does it provide a complete picture of the expected future conditions that also impact the test year level of investment. In addition, every test year will have atypical conditions or circumstances that can significantly impact class performance in that test year and for which it would be extremely difficult or impossible to make adjustments. Types of conditions or circumstances that impact class performances in a year include: abnormal weather; environmental and political factors; global and local economic factors, and; various other factors. The embedded cost allocation study provides

information that should be reviewed and interpreted through the steps of revenue distribution and rate design.

The proposed revenue distribution appropriately recognizes the current situation of SPS's New Mexico retail rates: considers the historical; current; and projected loads and other factors that support the current level of investment and costs; and avoids the potential for over-correction due to common variations in class performances between test years. In other words, the proposed approach offers the Commission a moderate alternative to strictly applying the results from the test-year class cost allocation study.

Q. Why are there variations in increases by class between rate cases?

A. The RORs produced by classes will vary to some extent between rate cases due to a variety of factors. Those factors include:

- differences in the composition of costs between test years;
- variances in the hour and day of summer monthly system peaks;
- variations in the composition of customers within classes;
- economic factors;
- non-normalized weather differences;
- energy efficiency and technology advancements implemented by customers;

- unusual events or circumstances that are not normalized and that affect the test year;
- new investment that is intended to not only serve existing loads but also to serve planned load growth; and
- revenue change distribution decisions from prior rate cases.

Q. Why did SPS employ the criteria that no customer class will receive a base rate increase less than 60% of the New Mexico average total bill increase and no customer class will receive more than 140% of the New Mexico average total bill increase?

A. This approach was used due to the fact that the biggest driver for this rate case is the addition of the Hale Wind Energy Project ("Hale Wind"). The addition of Hale Wind results in a significant increase in the New Mexico base rate revenue requirement, but will also produce significant savings in fuel and purchase power costs.

It is a common approach in rate cases to establish minimum level and maximum levels of rate increases that will be applied to customer classes in the rate increase distribution process. This approach is intended to ensure that all classes bear some portion of the burden for increased costs but also limits the increases so that no customer class will receive such a large increase that it could severely impact customers. Limiting the maximum increases is an approach that

has frequently been used at this commission and at other utility regulatory commissions to limit the impacts to certain customer classes.

Q. Why was the increase for the Residential Service, Residential Heating Service and Irrigation Power Service classes limited to 125% of the New Mexico average total bill percentage increase?

A. The impact on the Residential Service, Residential Heating Service and Irrigation Power Service classes was limited to 125% of the New Mexico average total bill percentage increase to reflect that SPS's large New Mexico capital investment growth in T&D over the last few years has been driven by the need to serve the growth in Commercial and Industrial ("C&I") loads in southeast New Mexico and not by growth in the loads for the residential and irrigation classes. It is consistent with SPS's goal of reducing intra-class subsidies while minimizing impacts to customers.

Therefore, SPS made the decision to further mitigate the impact on these customer classes to protect them from bearing an inordinate share of the investment and costs incurred primarily to serve current and future load growth in other customer classes.

The 125% percent limit was chosen as the limit because despite the fact that it is lower than the cap applied to other classes, the relative ROR for Total

Residential and for Irrigation Power Service move toward unity. In addition, this lower cap was employed for these classes because they do not benefit as much as other classes from the increased transmission and distribution capital investment and associated costs that have occurred in recent years.

Q. How does the proposed revenue distribution affect the ROR and the relative ROR among rate classes?

A. Attachment EDE-3 contains a comparison of the ROR and the relative ROR by customer class under present and proposed rates. This attachment reveals that the relative RORs for all classes, except for Municipal Street, moved closer to the system average ROR, or unity. The relative ROR for Municipal Street Lighting dropped from 0.81 to 0.73, despite the fact that they received the maximum level of increase based on total billed revenues.

IV. RATE DESIGN

A. Overview

Q. What topic do you discuss in this section of your testimony?

A. I explain how I designed the rates for each customer class.

Q. What do you mean when you refer to "rate design"?

A. I am referring to the way in which the revenue requirement amount recoverable from a particular class is allocated among demand charges, energy charges, and service availability charges. Collectively, the charges should be sufficient to recover the full amount of the revenue requirement allocated to that class.

Q. Are rates designed for all customer classes in the same way?

A. No. The rate design for a particular class is partly dependent on the resources available to measure how the customer uses electricity. Residential customers, for example, do not have demand meters so they do not pay demand charges. Instead, all of their costs are recovered through customer charges and energy charges. Similarly, it is not feasible to install a demand or energy meter on each street light, so rates for street lights are based on a per-light charge.

Q. How are customer-related charges recovered?

A. Customer-related costs are billed through a monthly service availability charge that does not vary with monthly differences and that applies to each customer in a

customer class. The service availability charge generally recovers costs associated with making service available to a customer, such as meters, meter reading, service connections to the customer from the distribution system, and billing. The charge also covers the fixed costs and Operation and Maintenance expenses associated with the facilities installed specifically to serve an individual customer such as meters and service lines.

Q. What costs are recovered through the demand charge element of base rates?

A. The demand charge is designed to recover the fixed capacity portion of the production, transmission, distribution substation, primary distribution, and secondary distribution systems.

Q. How are demand-related costs recovered from customers?

A. Production, transmission, and distribution demand-related costs are billed to the customer classes through a kilowatt ("kW") demand charge, if applicable, or through a kWh charge for customer classes that do not have demand metering and kW demand charges. Billing for demand-related costs varies with differences in monthly kW demand, or differences in monthly kWh if a kW demand charge is not billed.

Q. How are energy-related costs billed?

A. Energy-related costs are billed through a kWh charge.

Q. Are the kW or the kWh rates seasonally differentiated?

A. Yes. A seasonal differential is applied to kW demand charges during the summer months of June through September for those customer classes with meters that measure each customer's demand. If the rate does not have a kW demand charge, the kWh rate is seasonally differentiated for the capacity cost share of the rate. KWh rates also have a non-fuel energy cost component that does not vary by season.

Q. Why are the kW or kWh rates seasonally differentiated?

A. A seasonal differential provides a price signal to customers that it is more costly to provide the facilities necessary for service during peak summer months. A higher level of production, transmission, and distribution capacity is necessary to provide service at higher summer levels, resulting in higher costs than if loads on the system were level in all months.

Q. Is a seasonal differential applied to determine the charges that recover demand costs?

A. Yes. The demand charge for each rate includes a seasonal cost adjustment factor for the value of summer peaking capacity. The proposed seasonal differential between summer and winter for every demand-based rate is approximately 20%, which is comparable with the seasonal differential currently in demand rates. The

seasonal differential is applied to the demand rate for the non-summer months of October through May to develop the summer demand rate.

B. Proposed Changes to Rates

1. Residential Service and Residential Heating Service

Q. How are the Residential rates designed?

A. In this case, SPS is once again proposing a rate design that produces comparable proposed RORs for the Residential Service and Residential Heating Service customer classes.

Specifically, Residential customers are served under either the Residential Service or the Residential Heating Service rates. The distinction between the Residential Service and Residential Heating Service rates is that Residential Heating Service customers are residential customers that have predominantly electric space heating. Electric space heating includes permanently installed space heating equipment that is in regular use, including heat pumps and electric resistance heating, but excludes bathroom heaters.

The overall load factor of space heating customers is higher than the load factor of non-space heating customers because space heating customers use electricity as the primary source for heating their homes during the off-peak winter months, whereas Residential Service customers do not.

Accordingly, the per-kWh energy charges for Residential Heating Service customers are lower than the per-kWh charge for Residential Service during non-summer months to recognize that costs are spread over a greater number of kWh energy billing units. The residential summer per-kWh energy rate is the same for both Residential Service customers and Residential Heating Service customers because electric heating does not affect the summer peak. In designing the residential winter rates, SPS proposes to narrow the current difference between the Residential Heating Service summer and winter energy charges.

Overall, base rate revenue from residential customers will increase $12.3 million, or 15.0%. Under SPS's proposal, the service availability charge will increase $1.20 per month, or 13.7%, to $9.95. The summer energy charge will increase $0.012075 per kWh, or 16.1%, to $0.087261. For basic Residential Service, the winter energy charge will increase $0.009394 per kWh, or 14.8%, to $0.072718. For Residential Heating Service, the winter energy charge will increase $0.006811 per kWh, or 14.1%, to $0.055069.

The average Residential Service customer using 900 kWh per month will experience an average increase of $7.18 per month, or 7.6% increase on their total bill. The average Residential Heating Service customer using 1375 kWh per

month will experience an average increase of $7.87 per month, or 6.2% on their total bill.

Q. Are Residential rates designed to recover the full amount of residential non-fuel cost of service?

A. No. A cost-based base rate increase to both Residential rates, Residential Service and Residential Heating Service would exceed 150% of the overall 18.62% increase, or 31.84%. The basic Residential Service increase is slightly less than the allocated cost of service, at 15.15%. At cost of service, the basic Residential Service increase would have been 32.72%.

The 14.83% Residential Heating Service increase is also less than the allocated cost of service. At cost of service, the Residential Heating Service increase would have been 30.40%.

Q. With the $1.20 per month increase for both Residential Service and Residential Heating Service, will the service availability charge recover the full customer component cost of service?

A. No. With a $1.20 per month increase, the service availability charge will make up a little less than half of the gap between the current rate and the full, customer component cost of service. At cost of service, the service availability charge

would be $14.54 per month, a $5.79 increase from the present charge of $8.75 per month. The remaining cost to provide a service connection to a residential customer is recovered through the energy charge.

2. Small General Service

Q. Please describe the Small General Service rate.

A. The Small General Service rate is a rate for small commercial or other non-residential customers for electric service supplied at a secondary voltage, at one Point of Delivery and measured through one meter. The load for customers served under this rate cannot exceed 25 kW of demand in any month. Examples of types of customers served under this rate include small loads such as small offices, small businesses, shops, barns and water wells. The structure of this rate is similar to the Residential Service rate and only includes a service availability charge and a seasonal energy charge.

Q. Are there proposed changes to the Small General Service rate?

A. The base rate structure of Small General Service will not change, in that applicable charges include a service availability charge and an energy charge that increases during the months of June through September compared to other months.

Overall, base rate revenue from Small General Service will increase by approximately $1.6 million, or 15.5%. Under SPS's proposal, the service availability charge will increase $1.90 per month, or 13.2%. The summer energy charge will increase $0.009728 per kWh, or 17.2%, to $0.066187 per kWh. The winter energy charge will increase $0.007343 per kWh, or 15.4%, to $0.055156 per kWh. For the Small General Service – Optional Unmetered Service, the service availability charge will increase $1.10 per month, from $8.00 to $9.10 per month, or 13.8%.

Under the proposed rates, the Small General Service class moves closer to producing the system average rate of return. The proposed ROR for the class is 7.63%, which is 99% of the proposed ROR for New Mexico retail customers of 7.68%.

3. Secondary General Service

Q. Are there proposed changes to the Secondary General Service rate?

A. The base rate structure of Secondary General Service will not change, in that applicable charges include a service availability charge, a year-round energy charge, and a demand charge that increases during the months of June through September compared to other months.

Overall, base rate revenue from Secondary General Service will increase $5.2 million, or 12.58%. Under SPS's proposal, the service availability charge will increase $3.10 per month, or 10.7%, to $32.20. The energy charge will increase by $0.005427 per kWh, or 117.1%, to $0.010061 per kWh. The summer demand charge will increase $0.42 per kW, or 2.3%, to $18.91 per kW. The winter demand charge will increase $0.35 per kW, or 2.3%, to $15.75 per kW. The kilovolt amperes reactive ("kVar")-based power factor charge will increase $0.02 to $0.64 per kVar in excess of a 95% power factor, or 3.2%.

4. Primary General Service

Q. Are there proposed changes to the Primary General Service rate?

A. The base rate structure of Primary General Service will not change, in that applicable charges include a service availability charge, a year-round energy charge, and a demand charge that increases during the months of June through September compared to other months.

Overall, non-fuel base rate revenue from Primary General Service will increase $11.2 million, or 15.7%. Under SPS's proposal, the service availability charge will increase $5.20 per month, or 15.7%, to $38.30, to a cost of service-based level. The energy charge will increase $0.005424 per kWh, or 120.8%, to $0.009914 per kWh. The summer demand charge will increase $0.24 per kW, or

1.4%, to $17.14 per kW. The winter demand charge will increase $0.21 per kW, or 1.5%, to $14.29 per kW. The kVar-based power factor charge will increase $0.01 to $0.63 per kVar in excess of a 95% power factor, or 1.6%.

5. Irrigation Power Service

Q. Are there proposed changes to Irrigation rates?

A. The base rate structure of Irrigation will not change, in that applicable charges include a service availability charge, a year-round energy charge, and a demand charge that increases during the months of June through September compared to other months. Unlike the other C&I rate classes, however, a large percentage of capacity-related costs are recovered through the energy charge. SPS proposes to recover more of the capacity costs for Irrigation through the demand charge, particularly in the summer months. Although the proposed energy charge for Irrigation continues to recover a large portion of capacity costs, the proposed rate design will reduce the overall percentage from the current level.

Overall, base rate revenue from Irrigation will increase $0.7 million, or 17.0%, which is approximately $1.4 million less than the level that would have been recovered if rates were increased to cost of service at the New Mexico average ROR. Under SPS's proposal, the service availability charge will increase by $1.40 per month, or 6.4%, to a cost of service-based level of $23.40. The

energy charge will increase $0.008014 per kWh, or 16.8%, to $0.055728 per kWh. The summer demand charge will increase $0.40 per kW, or 21.4%, to $2.27 per kW. The winter demand charge will increase $0.40 per kW, or 26.8%, to $1.89 per kW. Both the current and proposed summer and winter Irrigation demand charges are considerably lower than demand cost-based rates.

Q. Why is SPS proposing a larger increase in the Irrigation demand charge?

A. Recovering more of the overall increase for the class through demand charges, particularly the summer demand charges, will more accurately reflect costs and reduce intra-class subsidies. In addition, recovery of more of the capacity costs through the demand charges will reduce the impacts on Irrigation customers during seasons in which greater irrigation is necessary. This is due to the fact that, during these periods, it will be necessary for Irrigation customers to pump more, thus consuming significantly more energy, as measured by kWh, but their kW demands should remain relatively constant. As a result, the proposed change in the summer demand charge and rate structure is reasonable.

Furthermore, even with the proposed summer demand charge increase, the proposed demand charges are only 11% of the $17.07[2] per kW demand charges

[2] 11% = $586,442 recovered through proposed kW demand charges / $5,293,911 CCOSS capacity cost $17.07=$5,293,911/310,163 kW.

that would result if the charge recovered the full amount of Irrigation demand costs, and rates were established at fully allocated cost of service.

6. Large General Service - Transmission

Q. Are there proposed changes to the LGS-T rate?

A. The base rate structure of LGS-T will not change, in that applicable charges include a service availability charge, a year-round energy charge, and a demand charge that increases during the months of June through September compared to other months. In addition, a different energy charge and demand charge will apply depending upon whether the LGS-T customer takes service at 69 kV or 115 kV and above. The proposed LGS-T rate is designed as a single rate with the demand and energy charges for service 69 kV and 115 kV and above differentiated by the applicable demand and energy loss factors. This differentiation based on the kV at which the customer takes service is a change from prior cases.

Overall, non-fuel base rate revenue from LGS-T customers will increase $18.1 million, or 34.0%. Under SPS's proposal, the service availability charge will increase $179.70 per month, or 18.4%, to $1,153.70, to a cost of service-based level.

The energy charge for LGS-T 69 kV will increase $0.005078 per kWh, or 120.9%, to $0.009278 per kWh. The summer demand charge will increase $1.35 per kW, or 12.0%, to $12.60 per kW. The winter demand charge will increase $1.12 per kW, or 12.0%, to $10.49 per kW. The kVar-based power factor charge will increase $0.11 to $0.73 per kVar in excess of a 95% power factor, or 17.7%.

The energy charge for LGS-T 115 kV will increase $0.005046 per kWh, or 120.9%, to $0.009221 per kWh. The summer demand charge will increase $1.36 per kW, or 12.2%, to $12.51 per kW. The winter demand charge will increase $1.12 per kW, or 12.0%, to $10.43 per kW. The kVar-based power factor charge will increase $0.11 to $0.73 per kVar in excess of a 95% power factor, or 17.7%.

Q. Is SPS proposing any additional changes to Rate Tariff No. 34, Large General Service – Transmission?

A. Yes. SPS is proposing to update the basis for the net present value of the lease termination charge to reflect SPS's proposed 7.68% overall cost of capital in this case. The current basis for the net present value of the lease termination charge is 7.24%, which is based upon SPS's cost of capital in the final order in Case No. 17-00255-UT.

7. Schools and Municipals

Q. Are there proposed changes to Small Municipal and School Service ("SMS") rates?

A. The base rate structure of SMS will not change, in that applicable charges include a service availability charge and an energy charge that increases during the months of June through September compared to other months.

Overall, base rate revenue from SMS will increase approximately $121,300, or 18.0%. Under SPS's proposal, the service availability charge will decrease $1.70 per month, or 11.8%, to $16.10. The summer energy charge will increase $0.010021 per kWh, or 22.2%, to $0.055193 per kWh. The winter energy charge will increase $0.007588 per kWh, or 19.8%, to $0.045994 per kWh. For the SMS – Optional Unmetered Service, the service availability charge will increase $1.00 per month, from $8.10 to $9.10 per month, or 12.3%.

Q. Are there proposed changes to the Large Municipal and School Service ("LMS") rate?

A. The base rate structure of LMS will not change, in that applicable charges include a service availability charge, a year-round energy charge, and a demand charge that increases during the months of June through September compared to other months.

Overall, base rate revenue from LMS will increase $1.2 million, or 19.7%, which is $428,000 less than a cost of service-based increase as a result of rate support provided by other rate classes. Under SPS's proposal, the service availability charge will increase $1.80 per month, or 4.8%, to $39.20. The energy charge will increase $0.005462 per kWh, or 119.7%, to $0.010025. The summer demand charge will increase $1.18 per kW, or 8.8%, to $14.54. The winter demand charge will increase $1.20 per kW, or 11.0%, to $12.12 per kW. The kVar-based power factor charge will increase $0.08 per kVar in excess of a 95% power factor to $0.70, or 12.9%.

8. Area Lighting and Municipal Street Lighting

Q. Are there proposed changes to the Area Lighting ("AL") rate?

A. The base rate structure of AL will not change, in that the applicable charge is a set monthly charge that varies according to light type and installation.

Overall, base rate revenue from AL will increase approximately $148,000, or 7.13%, which will cause this class to be fully cost of service-based rates, or, in other words, produce 100% of the requested New Mexico ROR.

Q. Are there proposed changes to the rates for Municipal Street Lighting ("SL")?

A. The base rate structure of SL will not change, in that applicable charges include a set monthly charge that varies according to light type and installation.

Overall, base rate revenue from SL will increase by approximately $234,000, or 12.1%, which, as a result of rate support provided by other rate classes, is $257,000 less than cost of service-based rates. Current monthly rates are increased 12.1% to recover the SL revenue requirement in base rates.

The proposed LED street lighting rates also increase by 12.1%, consistent with the rest of the SL class. The LED rates are adjusted to reflect the updated SL capacity cost per connected kW, the change in SL energy cost per kWh, improved cost information, and reduced installation costs for LED street lights. Currently, there are no LED SL customers, so the proposed LED changes will not affect any current customers.

C. Proposed Revenue Reconciliation

Q. Have you prepared a reconciliation of revenues under proposed rates with the proposed cost of service recovered through base rates?

A. Yes. Attachment EDE-4, Revenue at Proposed Rates, is a reconciliation of the Test Year revenue from proposed rates with the Test Year cost of service. By

applying the proposed base rates to the Test Year billing determinants, this attachment demonstrates that the proposed base rates, as designed, result in appropriate Test Year cost recovery. The resulting revenue is then compared to the total revenue requirement for each rate class, including the proposed gradualism adjustment. With only small differences due to the rounding of individual rate elements, Attachment EDE-4 demonstrates the accuracy of the level of the proposed base rates**.**

Q. Have you prepared a summary of all proposed base rates?

A. Yes. In Attachment EDE-5, Rate Comparison – Present vs. Proposed, I have prepared a summary of proposed base rates compared to current base rates.

V. TIME OF USE RATES

Q. What are TOU rates?

A. TOU rates are optional rates that vary according to the time of day, season, and day type (weekday or weekend). Higher prices are charged for usage during the peak demand hours and lower prices are charged for usage during off-peak (low) demand hours. These rates are designed to give customers an economic incentive to reduce their loads during the hours that SPS's system typically peaks. The goal is to reduce SPS's need for additional capacity to serve future peak loads and to enable SPS's system to operate more efficiently.

Q. Is SPS proposing to make the experimental TOU rate options permanent?

A. Yes. SPS is requesting the Commission approve the proposed TOU rate options as permanent rate options. In addition, SPS is proposing to eliminate the limits on the maximum number of customers who can select these rate options. The TOU rate options are available for customers in the Residential Service, Residential Heating Service, Irrigation Power Service, Small General Service, LMS, SMS, Primary General Service, and Secondary General Service classes.

Q. What is the on-peak period for purposes of the TOU rates?

A. The peak period established for all of the TOU rates is 12:00 noon to 6:00 p.m. MDT, Monday through Friday, during the peak months of June through September. All other hours are off-peak.

Q. What is the structure of the TOU rates?

A. The TOU rates for each customer class are based upon the corresponding standard, non-TOU rates. In addition, each TOU rate has an additional on-peak energy adder that significantly increases the cost of energy for all consumption that occurs during the on-peak hours. This structure sends customers a strong incentive to reduce consumption during the peak hours. This structure will enable customers to operate equipment periodically during peak hours without incurring a significant on-peak demand charge for infrequent loads. In addition, the service availability charge for each TOU rate is $1.00 per month more than the charge under the standard rate for smaller customers in kWh-metered rate classes and $2.00 per month for larger customers in kW demand-metered rate classes. The additional monthly charge is to recover the cost of removing meters for existing customers, installing new meters that are slightly more costly than the current meters on all participating customers, and programming the meters for the TOU rate option.

Q. How were the proposed energy and demand charges modified under the proposed rates?

A. In order to avoid disrupting the relationships between the standard rates and the TOU rate option SPS determined that it would not be appropriate at this time to make major changes to the structures of the TOU riders. Therefore, for the TOU rates without demand charges, the On-Peak Energy Charges were increased by approximately the same percentage as the summer energy charge under the standard rate. For the TOU riders with demand charges, the On-Peak Energy Charges were increased by approximately the same percentage as the summer demand charges under the standard rate. Also, SPS sought to keep the same relationship of the other TOU rider charges to the charges under the standard rates.

Q. Is the TOU option available to customers with customer-owned generation?

A. No. SPS proposes to provide the TOU option only to customers that do not have customer-owned generation. First of all, TOU net metering is significantly more complex and expensive than standard TOU metering. Customers with customer-owned generation already receive a net metering benefit for excess generation that provides reversal of the kWh energy charge for power provided by SPS. Finally, the goal in the development of TOU rate option was to offer an

alternative pricing option for full requirements, retail customers that encourages customers to either reduce or shift loads off SPS's peak periods.

Q. Please summarize the Residential TOU rate rider.

A. The elements of the Residential TOU rate option are comparable to Residential Service, in that the Residential TOU customer's bill will include a service availability charge and an energy charge. The TOU rate will have an off-peak energy charge of $0.060574 per kWh, and an on-peak energy charge that totals $0.219953 per kWh with the on-peak adder of $0.159379. In addition, the service availability charge for the TOU rate option will be $1.00 more per month than the service availability charge for Residential Service to account for meter replacement and meter programming for the TOU option.

Q. Please summarize the Small General Service TOU rate rider.

A. The elements of the Small General Service TOU rate rider are comparable to Small General Service, in that the Secondary General Service TOU customer's bill will include a service availability charge and an energy charge. The TOU rate will have an off-peak energy charge of $0.043964 per kWh, and an on-peak energy charge that totals $0.219095 per kWh with the on-peak adder of $0.175131. In addition, the service availability charge for the TOU rate option

will be $1.00 more per month than the service availability charge for the Small General Service to account for meter replacement and meter programming for the TOU option.

Q. Please summarize the Secondary General TOU rate rider.

A. The elements of the Secondary General TOU rate are comparable to the Secondary General rate, in that the Secondary General TOU customer's bill will include a service availability charge, an energy charge, and a demand charge. A year-round TOU demand charge per kW will apply, at $12.70 per kW. The TOU rate will have the same energy charge as Secondary General per kWh, but the on-peak energy charge will total $0.157302 per kWh with the on-peak adder of $0.147241. In addition, the service availability charge for the TOU rate option will be $2.00 more than the service availability charge for the Secondary General Service to account for meter replacement and meter programming for the TOU option.

Q. Please summarize the Primary General TOU rate rider.

A. The elements of the Primary General TOU rate are comparable to Primary General, in that the Primary General TOU customer's bill will include a service availability charge, an energy charge, and a demand charge. A year-round TOU demand charge per kW will apply, at $11.61 per kW. The TOU rate will have the

same energy charge as Primary General per kWh, but the on-peak energy charge will total $0.130649 per kWh with the on-peak adder of $0.120735. In addition, the service availability charge for the TOU rate option will be $2.00 more per month than the service availability charge for the Primary General Service to account for meter replacement and meter programming for the TOU option.

Q. Please summarize the Irrigation TOU rate rider.

A. The elements of the Irrigation TOU rate are comparable to Irrigation, in that the Irrigation TOU customer's bill will include a service availability charge, an energy charge, and a demand charge. A year-round demand charge per kW will apply, at $1.80 per kW. The TOU rate will have an off-peak energy charge of $0.0.037527 per kWh, but the on-peak energy charge will total $0.235479 per kWh with the on-peak adder of $0.197952. In addition, the service availability charge for the TOU rate option will be $1.00 more per month than the Irrigation service availability charge to account for meter replacement and meter programming for the TOU option.

Q. Please summarize the SMS TOU rate rider.

A. The elements of the SMS TOU rate rider are comparable to SMS, in that the SMS TOU customer's bill will include a service availability charge and an energy charge. The TOU rate will have an off-peak energy charge of $0.0.037156 per

kWh, and an on-peak energy charge that totals $0.198270 per kWh with the on-peak adder of $0.161114. In addition, the service availability charge for the TOU rate option will be $1.00 more per month than the SMS service availability charge to account for meter replacement and meter programming for the TOU option.

Q. Please summarize the LMS TOU rate rider.

A. The elements of the LMS TOU rate are comparable to LMS, in that the LMS TOU customer's bill will include a service availability charge, an energy charge, and a demand charge. The differences are in the demand charge and the on-peak energy adder. A year-round TOU demand charge per kW will apply, at $9.25 per kW. The TOU rate will have the same energy charge as LMS per kWh, but the on-peak energy charge will total $0.163656 per kWh with the on-peak adder of $0.153631. In addition, the service availability charge for the LMS TOU rate option will be $2.00 more per month than the LMS service availability charge to account for meter replacement and meter programming for the TOU option.

VI. TARIFF CHANGES

A. Rate Tariff Changes

Q. What are rate tariffs?

A. Rate tariffs specify the terms and conditions under which SPS will provide service, including the rates at which it will provide service.

Q. Is SPS proposing and rate tariff changes in this case?

A. Yes. SPS proposes modifications to the tariff provisions for Rate No. 13 – Primary General Service, Rate No. 40 – Secondary General Service, Rate No. 14 – Municipal Street Lighting Service and Rate No. 28 -Area Lighting Service. In addition, SPS proposes that rates 48, 49 and 75 be terminated.

Q. What change does SPS propose to the tariff provisions for Rate No. 13 – Primary General Service?

A. SPS is proposing to change the applicability section to state as follows:

> To all oil and gas and commercial and industrial electric service supplied at **the available** primary voltage of 2.4 kV or higher, but less than 69 kV, **without additional SPS-supplied transformation facilities,** and at a single Point of Delivery measured through approved electrical metering determined by Company, where facility of adequate capacity and suitable voltage are adjacent to the premises served. (**Emphasis added**)

In addition, SPS is proposing to modify the Loss Adjustment section of the tariff. Currently, that section states, "The meter readings used for billing shall be increased to include all transformation losses, when secondary voltage metering is installed on Customer's side of the Point of Delivery." The proposed change will specifically identify the loss adjustment factors applicable to kW and kWh, which are based upon loss factors from SPS's loss study. The specific loss adjustment factor for kWh is 1.73% and the loss adjustment factor for kW is 2.72%.

Q. Why is SPS proposing the change to the applicability section?

A. SPS is proposing this change to eliminate an obligation for SPS to provide additional facilities to transform the electric service from the available primary voltage to a lower primary voltage to serve a specific customer. Without this provision, SPS would continue to be required to provide additional facilities at no additional cost to specific customers. These additional costs would be spread to all other customers. On the other hand, in all circumstances where the service voltage is transformed to below 1 kV using similar types of additional facilities, the customer is identified as a secondary voltage service customer and served under Secondary General Service.

In addition, the energy losses for sales to a customer that requires additional transformation from a primary voltage to a lower primary voltage are very similar to the energy losses for a secondary voltage customer. Therefore, customers who require an additional transformation from the available primary voltage will be billed as a secondary customer for base rate billing and for fuel and purchased power costs.

Q. What change does SPS propose to the tariff provisions for Rate No. 40 – Secondary General Service?

A. SPS is proposing to change the applicability section to state as follows:

> To all commercial and industrial electric service supplied **at secondary voltage or through an SPS-supplied transformation from the available primary voltage**, at one Point of Delivery and measured through one meter with a demand greater than 25 kW and served where facilities of adequate capacity and suitable voltage are adjacent to the premises to be served.
>
> Not applicable to resale or shared service. **Also, not applicable for service to oil and natural gas production Customers, except where customer cannot take service under the Primary General Service rate**

due to the requirement of additional Company owned transformation facilities from the available primary voltage. (**Emphasis added**)

Q. Why is SPS proposing this tariff change?

A. This change is being proposed in conjunction with and as a result of the proposed change to applicability section of Rate 13 – Primary General Service.

Q. What change does SPS propose to the tariff provisions for Rate No. 14 – Municipal Street Lighting Service?

A. In order to better manage the available rate options and the equipment SPS must keep in store to serve those rate options in the future, SPS proposes to remove the 4,000 lumen LED option from this tariff.

Q. Why is SPS proposing this tariff change?

A. SPS is proposing to eliminate the 4,000 lumen LED option in the tariff because SPS has not had any demand for the option in New Mexico. Eliminating this option in the tariff will eliminate the need and associated cost for SPS to maintain an inventory of these optional fixture sizes fixtures that are not in demand by customers.

Q. What change does SPS propose to the tariff provisions for Rate No. 28 -Area Lighting Service?

A. SPS proposes to update the existing Rate No. 28 to clarify the allowable lighting options as well as to include supported LED light offerings in accordance with the New Mexico Night Sky Protection Act, NMSA 1978, § 74-12-1 *et seq*. ("the Act").

Q. Why is SPS proposing this tariff change?

A. Although Rate No. 28 is closed to new customers, existing lights must be maintained pursuant to the Act, which requires utilities to install lighting that complies with the Act when repairing legacy light offerings. Specifically, the Act precludes the installation of mercury vapor lighting fixtures and requires shielding of fixtures with wattage greater than 150 watts. Additionally, SPS proposes to update the lighting under this tariff to LED lighting. This change will standardize the lighting color and ensure consistent lighting across the SPS service area. The variety of white, blue, and orange lighting hues will be standardized to the existing municipal LED color offerings.

Q. Why is SPS proposing to eliminate Rate Nos. 48, 49 and 75?

A. Residential Saver's Switch (Rate No. 48), Commercial Saver's Switch (Rate No. 49), and Residential Smart Thermostat Pilot (Rate No. 75) will no longer be

offered as part of SPS's Energy Efficiency programs effective January 1, 2020, in accordance with SPS's Application and Testimony filed in Case No. 19-00140-UT on May 15, 2019. Currently, no New Mexico customers are participating in any of the aforementioned programs.

B. Rule Tariffs

Q. What are rule tariffs?

A. The Rules, Regulations, and Conditions of Service are commonly referred to as rule tariffs. Rule tariffs contain SPS's policies on services such as application for service, customer installation, customer deposits, service disconnection, billing adjustments, metering, and extension of service.

Q. Is SPS proposing any changes to its rule tariffs?

A. Yes. SPS is proposing the following changes to its rule tariff No. 16 – Extension to Customers.

Q. What change does SPS propose to Rule Tariff No. 16 – Extension to Customers?

A. SPS is proposing four, relatively minor changes to its line extension policy. First, SPS is proposing an introductory statement to indicate that the policy is only applicable to extensions to customers taking service at distribution voltages.

Next, SPS is proposing to change the policy so that the customer will be responsible for providing the necessary right of way required for the line extension.

The last two changes are housekeeping changes. First, SPS is requesting to eliminate the provision related to Energy Star Homes in Section A, because that program is no longer active. The other housekeeping change is to correct subsection references.

Q. Why is SPS proposing the change to make the customer responsible for providing the right of way required for the line extensions?

A. This change is being proposed in order to require the customer to provide rights of way over property they either own, control or for which they have influence and this change will compel them to work with their neighbors in order to obtain the rights of way at a lower cost. The costs of any rights of way are currently included in the cost of the line extensions and are included in the calculation of the amount of Contribution in Aid to Construction that will be required from customers.

SPS believes that customers will usually have a better relationship with their neighbors from whom they may need rights of way and will be in a better

position to negotiate lower costs. However, when SPS negotiates for the rights of way, SPS is in essence negotiating with the customer's money.

Q. Does this conclude your direct pre-filed testimony?

A. Yes.

VERIFICATION

STATE OF TEXAS)
) ss.
COUNTY OF POTTER)

EVAN D. EVANS, first being sworn on his oath, states:

I am the witness identified in the preceding direct testimony. I have read the direct testimony and the accompanying attachment(s) and am familiar with their contents. Based upon my personal knowledge, the facts stated in the testimony are true. In addition, in my judgment and based upon my professional experience, the opinions and conclusions stated in the testimony are true, valid, and accurate.

Evan D. Evans
EVAN D. EVANS

SUBSCRIBED AND SWORN TO before me this 24th day of June, 2019 by EVAN D. EVANS.

CINDY BAEZA
Notary Public, State of Texas
Notary ID #13078365-0
My Commission Expires 10-06-2020

Cindy Baeza
Notary Public of the State of Texas
My Commission Expires: 10-06-2020

SOUTHWESTERN PUBLIC SERVICE COMPANY
17-00255- UT Compliance Information on Time of Use Customers
Number of Participants

Line No.	Customer Class	Number of Customers - Total Participation	Number of Customers - Current Participation
1	Residential Service	9	8
2	Residential Heating Service	5	4
3	Secondary General Service	1	1
4	Large Municipal and School Service	24	0
5	Total	39	13

SOUTHWESTERN PUBLIC SERVICE COMPANY
17-00255- UT Compliance Information on Time of Use Customers
Average $/kWh and Total $ Paid for TOU Rates vs. General Rates

Line No.	Customer	(a) Average $/kWh under TOU Rate	(b) Average $/kWh under General Rate	(c) = (a) - (b) Difference	(c) / (a) % Difference	(d) Total $ Paid while on TOU Rate	(e) Total $ under General Rate	(f) = (d) - (e) Difference	(f) / (d) % Difference
1	**Residential Service**								
2	Customer 1	$ 0.093983	$ 0.101091	$ (0.007108)	-7.563%	$ 3,556.51	$ 3,825.49	$ (268.98)	-7.031%
3	Customer 2	$ 0.104869	$ 0.107226	$ (0.002357)	-2.248%	$ 2,391.34	$ 2,445.09	$ (53.75)	-2.198%
4	Customer 3	$ 0.102804	$ 0.106876	$ (0.004072)	-3.960%	$ 2,001.60	$ 2,080.87	$ (79.27)	-3.810%
5	Customer 4	$ 0.099818	$ 0.099375	$ 0.000443	0.443%	$ 3,715.01	$ 3,698.54	$ 16.47	0.445%
6	Customer 5	$ 0.110348	$ 0.115451	$ (0.005103)	-4.624%	$ 1,571.14	$ 1,643.79	$ (72.65)	-4.420%
7	Customer 6	$ 0.141292	$ 0.139207	$ 0.002085	1.475%	$ 522.08	$ 514.38	$ 7.70	1.498%
8	Customer 7	$ 0.093270	$ 0.095153	$ (0.001883)	-2.019%	$ 3,225.85	$ 3,290.98	$ (65.13)	-1.979%
9	Customer 8	$ 0.120556	$ 0.110896	$ 0.009660	8.013%	$ 953.84	$ 877.41	$ 76.43	8.711%
10	Customer 9	$ 0.072776	$ 0.092767	$ (0.019990)	-27.468%	$ 1,505.60	$ 1,919.16	$ (413.56)	-21.549%
11	**Class Total**					$ 19,442.97	$ 20,295.71	$ (852.74)	-4.202%
12	**Residential Heating Service**								
13	Customer 10	$ 0.090555	$ 0.083297	$ 0.007258	8.015%	$ 5,410.10	$ 4,976.48	$ 433.62	8.713%
14	Customer 11	$ 0.113224	$ 0.103611	$ 0.009613	8.490%	$ 1,846.79	$ 1,689.99	$ 156.80	9.278%
15	Customer 12	$ 0.096611	$ 0.092079	$ 0.004532	4.691%	$ 3,743.68	$ 3,568.08	$ 175.60	4.921%
16	Customer 13	$ 0.101569	$ 0.096386	$ 0.005183	5.103%	$ 1,626.63	$ 1,543.62	$ 83.01	5.377%
17	Customer 14	$ 0.091942	$ 0.070862	$ 0.021080	22.928%	$ 73.37	$ 56.55	$ 16.82	29.748%
18	**Class Total**					$ 12,700.57	$ 11,834.73	$ 865.84	7.316%
19	**Secondary General Service**								
20	Customer 15	$ 0.145434	$ 0.165002	$ (0.019568)	-13.455%	$ 61,692.91	$ 69,993.68	$ (8,300.77)	-11.859%
21	**Class Total**					$ 61,692.91	$ 69,993.68	$ (8,300.77)	-11.859%

SOUTHWESTERN PUBLIC SERVICE COMPANY
17-00255- UT Compliance Information on Time of Use Customers
Average $/kWh and Total $ Paid for TOU Rates vs. General Rates

Line No.	Customer	(a) Average $/kWh under TOU Rate	(b) Average $/kWh under General Rate	(c) = (a) - (b) Difference	(c) / (a) % Difference	(d) Total $ Paid while on TOU Rate	(e) Total $ under General Rate	(f) = (d) - (e) Difference	(f) / (d) % Difference
	Large Municipal and School								
22	**Service**								
23	Customer 16	$ 0.093723	$ 0.092704	$ 0.001019	1.088%	$ 62,652.17	$ 61,970.72	$ 681.45	1.100%
24	Customer 17	$ 0.066848	$ 0.062822	$ 0.004027	6.024%	$ 17,193.42	$ 16,157.76	$ 1,035.66	6.410%
25	Customer 18	$ 0.099628	$ 0.105527	$ (0.005899)	-5.921%	$ 31,466.60	$ 33,329.70	$ (1,863.10)	-5.590%
26	Customer 19	$ 0.090664	$ 0.091089	$ (0.000425)	-0.469%	$ 73,865.82	$ 74,212.26	$ (346.44)	-0.467%
27	Customer 20	$ 0.095917	$ 0.097415	$ (0.001498)	-1.562%	$ 23,921.65	$ 24,295.35	$ (373.70)	-1.538%
28	Customer 21	$ 0.091226	$ 0.093113	$ (0.001886)	-2.068%	$ 34,622.27	$ 35,338.19	$ (715.92)	-2.026%
29	Customer 22	$ 0.101285	$ 0.106828	$ (0.005543)	-5.473%	$ 41,506.72	$ 43,778.22	$ (2,271.50)	-5.189%
30	Customer 23	$ 0.092046	$ 0.093742	$ (0.001696)	-1.843%	$ 56,138.85	$ 57,173.26	$ (1,034.41)	-1.809%
31	Customer 24	$ 0.082058	$ 0.082921	$ (0.000863)	-1.052%	$ 53,178.40	$ 53,737.89	$ (559.49)	-1.041%
32	Customer 25	$ 0.100852	$ 0.105783	$ (0.004932)	-4.890%	$ 43,785.74	$ 45,926.91	$ (2,141.17)	-4.662%
33	Customer 26	$ 0.100681	$ 0.105951	$ (0.005270)	-5.234%	$ 49,720.22	$ 52,322.68	$ (2,602.46)	-4.974%
34	Customer 27	$ 0.091736	$ 0.095888	$ (0.004152)	-4.526%	$ 30,082.12	$ 31,443.63	$ (1,361.51)	-4.330%
35	Customer 28	$ 0.098685	$ 0.102111	$ (0.003426)	-3.471%	$ 32,921.48	$ 34,064.30	$ (1,142.82)	-3.355%
36	Customer 29	$ 0.086913	$ 0.087574	$ (0.000661)	-0.761%	$ 77,595.93	$ 78,186.22	$ (590.29)	-0.755%
37	Customer 30	$ 0.094452	$ 0.097326	$ (0.002874)	-3.043%	$ 26,227.34	$ 27,025.45	$ (798.11)	-2.953%
38	Customer 31	$ 0.073080	$ 0.070396	$ 0.002684	3.673%	$ 95,647.55	$ 92,134.89	$ 3,512.66	3.813%
39	Customer 32	$ 0.090461	$ 0.091575	$ (0.001114)	-1.231%	$ 51,278.10	$ 51,909.52	$ (631.42)	-1.216%
40	Customer 33	$ 0.076169	$ 0.075471	$ 0.000698	0.916%	$ 11,650.79	$ 11,544.09	$ 106.70	0.924%
41	Customer 34	$ 0.083758	$ 0.085280	$ (0.001523)	-1.818%	$ 131,842.73	$ 134,240.02	$ (2,397.29)	-1.786%
42	Customer 35	$ 0.083100	$ 0.085370	$ (0.002269)	-2.731%	$ 13,988.29	$ 14,370.30	$ (382.01)	-2.658%
43	Customer 36	$ 0.094627	$ 0.096740	$ (0.002113)	-2.233%	$ 91,447.54	$ 93,489.48	$ (2,041.94)	-2.184%
44	Customer 37	$ 0.087678	$ 0.088210	$ (0.000532)	-0.606%	$ 74,435.21	$ 74,886.55	$ (451.34)	-0.603%
45	Customer 38	$ 0.096938	$ 0.098687	$ (0.001749)	-1.804%	$ 32,989.80	$ 33,585.02	$ (595.22)	-1.772%
46	Customer 39	$ 0.098066	$ 0.103129	$ (0.005064)	-5.163%	$ 43,729.45	$ 45,987.39	$ (2,257.94)	-4.910%
47	**Class Total**					$ 1,201,888.19	$ 1,221,109.80	$ (19,221.61)	-1.574%
48	**New Mexico Total**					$ 1,295,724.64	$ 1,323,233.91	$ (27,509.27)	-2.079%

SOUTHWESTERN PUBLIC SERVICE COMPANY
Distribution of Revenue Increase by Customer Class

Line No.		Total Base Revenues year	Total Present Revenues	Distribution with 60% & 140% Total Bill Limits and 125% Limit for Residential and Irrigation				
				Base Rate Increase	% Base Rate Increase	Total Proposed Revenues with New Fuel	% Increase onTotal Revenues	Proposed Base Rate Revenues
1	Residential Service	50,519,075	69,047,342	7,252,455	14.36%	73,818,163	6.91%	$ 57,771,530
2	Residential Heating Service	31,158,450	44,975,180	5,021,901	16.12%	48,082,736	6.91%	$ 36,180,350
3	Total Residential	81,677,525	114,022,522	12,274,356	15.03%	121,900,900	6.91%	93,951,881
4	Small General Service	10,125,568	14,565,360	1,573,679	15.54%	15,533,384	6.65%	$ 11,699,247
5	Irrigation Power Service	4,148,883	6,148,722	704,628	16.98%	6,573,568	6.91%	$ 4,853,510
5	Secondary General Service	41,455,715	63,194,803	5,215,315	12.58%	65,350,797	3.41%	$ 46,671,031
6	Primary General Service	71,269,778	120,458,358	11,180,609	15.69%	124,567,993	3.41%	$ 82,450,386
7	Large General Service Transmission	53,261,605	115,083,348	18,130,320	34.04%	123,989,225	7.74%	$ 71,391,925
8	Total Commercial and Industrial	165,987,098	298,736,509	34,526,244	20.80%	313,908,015	5.08%	200,513,342
9	Small Municipal and School Service	672,578	994,140	121,332	18.04%	1,071,073	7.74%	$ 793,910
10	Large Municipal and School Service	6,076,894	9,398,197	1,195,938	19.68%	10,125,488	7.74%	$ 7,272,832
11	Municipal Street Lighting Service	1,932,426	2,343,890	233,660	12.09%	2,525,275	7.74%	$ 2,166,086
12	Area Lighting Service	2,076,870	2,545,451	148,454	7.15%	2,633,766	3.47%	$ 2,225,324
13	Total New Mexico Retail	272,697,842	448,754,792	50,778,291	18.62%	474,271,469	5.69%	$ 323,476,132

SOUTHWESTERN PUBLIC SERVICE COMPANY
Distribution of Revenue Increase by Customer Class

Line No.		Total Present Base Revenues	Test Year Fuel Revenue	Energy Efficiency Rider	RPS Rider	Total Present Revenues
1	Residential Service	50,519,075	13,814,020	2,184,412	2,529,835	69,047,342
2	Residential Heating Service	31,158,450	10,486,131	1,422,854	1,907,745	44,975,180
3	Total Residential	81,677,525	24,300,151	3,607,266	4,437,580	114,022,522
4	Small General Service	10,125,568	3,363,584	460,796	615,412	14,565,360
5	Irrigation Power Service	4,148,883	1,527,322	194,524	277,994	6,148,722
5	Secondary General Service	41,455,715	16,700,166	1,999,258	3,039,663	63,194,803
6	Primary General Service	71,269,778	38,584,841	3,448,106	7,155,634	120,458,358
7	Large General Service Transmission	53,261,605	50,104,538	1,750,879	9,966,327	115,083,348
8	Total Commercial and Industrial	165,987,098	105,389,545	7,198,243	20,161,623	298,736,509
9	Small Municipal and School Service	672,578	245,320	31,451	44,791	994,140
10	Large Municipal and School Service	6,076,894	2,558,326	297,326	465,651	9,398,197
11	Municipal Street Lighting Service	1,932,426	285,371	74,152	51,941	2,343,890
12	Area Lighting Service	2,076,870	328,297	80,529	59,755	2,545,451
13	Total New Mexico Retail	272,697,842	137,997,916	11,944,287	26,114,747	448,754,792

SOUTHWESTERN PUBLIC SERVICE COMPANY
Distribution of Revenue Increase by Customer Class

Line No.		Total Base Rate Cost of Service at Equalized ROR	Revenue Deficiency At Equalized ROR	% Base Rate Revenue Deficiency	Rate Year Fuel Revenue (August 2019 through July 2020)	Total Revenues at Equalized ROR	% Total Bill Increase @ Equalized
1	Residential Service	67,050,961	16,531,886	32.72%	11,332,386	83,097,594	20.35%
2	Residential Heating Service	40,630,228	9,471,779	30.40%	8,571,787	52,532,614	16.80%
3	Total Residential	107,681,189	26,003,664	31.84%	19,904,173	135,630,208	18.95%
4	Small General Service	11,727,007	1,601,439	15.82%	2,757,929	15,561,144	6.84%
5	Irrigation Power Service	6,295,055	2,146,173	51.73%	1,247,540	8,015,113	30.35%
5	Secondary General Service	45,444,634	3,988,918	9.62%	13,640,845	64,124,400	1.47%
6	Primary General Service	68,863,432	(2,406,346)	-3.38%	31,513,867	110,981,038	-7.87%
7	Large General Service Transmission	70,287,200	17,025,596	31.97%	40,880,094	122,884,500	6.78%
8	Total Commercial and Industrial	184,595,266	18,608,168	11.21%	86,034,806	297,989,938	-0.25%
9	Small Municipal and School Service	826,684	154,105	22.91%	200,921	1,103,847	11.04%
10	Large Municipal and School Service	7,702,158	1,625,264	26.74%	2,089,680	10,554,815	12.31%
11	Municipal Street Lighting Service	2,423,449	491,023	25.41%	233,095	2,782,638	18.72%
12	Area Lighting Service	2,225,324	148,454	7.15%	268,158	2,633,766	3.47%
13	Total New Mexico Retail	323,476,132	50,778,291	18.62%	112,736,303	474,271,469	5.69%

SOUTHWESTERN PUBLIC SERVICE COMPANY
Distribution of Revenue Increase by Customer Class

Line No.		60% Minimum Total Bill Rate Increase	140% Maximum Total Bill Rate Increase	Initial Revenue Increase Target with Increase Caps	Amount to be Recovered from Uncapped Classes	Allocator for Difference	Allocation of Unrecovered Revenue Distribution	Revised Increase	Target Base Rate Increase	% Base Rate Increase	% Base Rate Increase Relative to Average
1	Residential Service	2,355,663	4,907,632	4,907,632	9,142,620	4,907,632	(136,811)	4,770,821	7,252,455	14.36%	77.10%
2	Residential Heating Service	1,534,402	3,196,671	3,196,671	4,360,764	3,196,671	(89,114)	3,107,557	5,021,901	16.12%	86.56%
3	Total Residential	3,890,065	8,104,303	8,104,303	13,503,383	8,104,303	(225,926)	7,878,378	12,274,356	15.03%	80.70%
4	Small General Service	496,921	1,159,483	995,784	-	995,784	(27,760)	968,024	1,573,679	15.54%	83.46%
5	Irrigation Power Service	209,774	437,029	437,029	1,429,362	437,029	(12,183)	424,846	704,628	16.98%	91.21%
						-	0				
5	Secondary General Service	2,155,994	5,030,654	2,155,994	(1,226,397)	-	-	2,155,994	5,215,315	12.58%	67.56%
6	Primary General Service	4,109,635	9,589,147	4,109,635	(13,586,954)	-	-	4,109,635	11,180,609	15.69%	84.25%
7	Large General Service Transmission	3,926,257	9,161,267	9,161,267	(1,360,116)	9,161,267	(255,391)	8,905,876	18,130,320	34.04%	182.81%
8	Total Commercial and Industrial	10,191,886	23,781,068	15,426,896	(16,173,467)	9,161,267	(255,391)	15,171,505	34,526,244	20.80%	111.71%
9	Small Municipal and School Service	33,917	79,139	79,139	30,567	79,139	(2,206)	76,933	121,332	18.04%	96.88%
10	Large Municipal and School Service	320,635	748,148	748,148	408,470	748,148	(20,856)	727,292	1,195,938	19.68%	105.69%
11	Municipal Street Lighting Service	79,966	186,587	186,587	252,161	186,587	(5,202)	181,385	233,660	12.09%	64.94%
12	Area Lighting Service	86,842	202,632	88,315	-	-	-	88,315	148,454	7.15%	38.39%
13	Total New Mexico Retail	15,310,006	34,698,388	26,066,200	(549,523)	19,712,256	(549,523)	25,516,677	50,778,291	18.62%	100.00%

Min & Max Increase Limits	**60%**	**140%**
Residential & Irrigation Cap		**125%**

Attachment EDE-2
Page 4 of 5
Case No. 19-00170-UT

SOUTHWESTERN PUBLIC SERVICE COMPANY
Distribution of Revenue Increase by Customer Class

Line No.		Base Rates Revenue	Total Proposed Revenues with New Fuel	% Total Revenue Increase	% Total Bill Increase Relative to Average
1	Residential Service	57,771,530	73,818,163	6.91%	121.52%
2	Residential Heating Service	36,180,350	48,082,736	6.91%	121.52%
3	Total Residential	93,951,881	121,900,900	6.91%	121.52%
4	Small General Service	11,699,247	15,533,384	6.65%	116.88%
5	Irrigation Power Service	4,853,510	6,573,568	6.91%	121.52%
5	Secondary General Service	46,671,031	65,350,797	3.41%	60.00%
6	Primary General Service	82,450,386	124,567,993	3.41%	60.00%
7	Large General Service Transmission	71,391,925	123,989,225	7.74%	136.10%
8	Total Commercial and Industrial	200,513,342	313,908,015	5.08%	89.32%
9	Small Municipal and School Service	793,910	1,071,073	7.74%	136.10%
10	Large Municipal and School Service	7,272,832	10,125,488	7.74%	136.10%
11	Municipal Street Lighting Service	2,166,086	2,525,275	7.74%	136.10%
12	Area Lighting Service	2,225,324	2,633,766	3.47%	61.02%
13	Total New Mexico Retail	323,476,132	474,271,469	5.69%	100.00%

SOUTHWESTERN PUBLIC SERVICE COMPANY
Comparison of
Relative Rates of Return at Present

Customer Class	Return at Present Rates	Rate Base	ROR at Present	Relative ROR at Present	Return at Proposed Rates	ROR at Proposed	Relative ROR at Proposed	Movement Relative to Unity
Residential Service	7,225,687	261,748,902	2.76%	0.60	13,186,266	5.04%	0.66	0.06
Residential Space Heating Service	5,013,384	161,340,103	3.11%	0.68	8,613,298	5.34%	0.70	0.02
Total Residential Service	12,239,071	423,089,005	2.89%	0.63	21,799,564	5.15%	0.67	0.04
Small General Service	2,162,978	44,405,396	4.87%	1.07	3,388,712	7.63%	0.99	0.06
Irrigation Service	391,997	26,870,347	1.46%	0.32	940,825	3.50%	0.46	0.14
Secondary General Service	11,536,925	190,675,606	6.05%	1.33	15,599,074	8.18%	1.07	0.26
Primary General Service	22,923,622	274,079,987	8.36%	1.83	31,631,140	11.54%	1.50	0.33
Large General Service Trans - 69 kV	565,943	18,065,566	3.13%	0.69	1,479,982	8.19%	1.07	0.24
Large General Service Trans - 115 kV	6,177,554	242,411,958	2.55%	0.56	19,384,922	8.00%	1.04	0.40
Total Large General Service Trans	6,743,498	260,477,524	2.59%	0.57	20,864,904	8.01%	1.04	0.39
Total Commercial and Industrial	41,204,045	725,233,117	5.68%	1.24	68,095,117	9.39%	1.22	0.02
Small Municipal and School Service	108,542	2,976,229	3.65%	0.80	203,049	6.82%	0.89	0.09
Large Municipal and School Service	1,266,889	32,979,191	3.84%	0.84	2,199,467	6.67%	0.87	0.03
Street Lighting Service	351,055	9,550,930	3.68%	0.81	533,276	5.58%	0.73	(0.08)
Area Lighting Service	215,995	4,318,031	5.00%	1.10	331,376	7.67%	1.00	0.10
Total New Mexico	57,940,572	1,269,422,245	4.56%	1.00	97,491,385	7.68%	1.00	-

SOUTHWESTERN PUBLIC SERVICE COMPANY
New Mexico Retail
Proof of Revenue Analysis - Proposed Rates
12 Months Ended March 31, 2019

Base Rate Revenue at Proposed Base Rates

Line No.	Rate Class	Billing Units	Rate	Revenue - $	FPPCAC	Adjusted Fuel Revenue	RPS Revenue, at $0.003888 per kWh	EER Revenue at 3.267%
	Residential Service							
	Residential Lighting							
1	Service Availability Charge	726,854 Bills	$ 9.95 / Month	$ 7,232,197				$ 236,276
2	Energy Charge - Summer	249,058,121 kWh	$ 0.087261 / kWh	$ 21,733,061	$ 0.016803	$ 4,184,924	$ 968,338	$ 878,376
3	Energy Charge - Winter	401,441,912 kWh	$ 0.072718 / kWh	$ 29,192,053	$ 0.017797	$ 7,144,462	$ 1,560,806	$ 1,238,105
4	Total	650,500,033 kWh		$ 58,157,311		$ 11,329,386	$ 2,529,144	$ 2,352,758
	Residential Heating							
5	Service & Facility Charge	357,082 Bills	$ 9.95 / Month	$ 3,552,966				$ 116,075
6	Energy Charge - Summer	161,727,049 kWh	$ 0.087261 / kWh	$ 14,112,464	$ 0.016803	$ 2,717,500	$ 628,795	$ 570,378
7	Energy Charge - Winter	328,947,993 kWh	$ 0.055069 / kWh	$ 18,114,837	$ 0.017797	$ 5,854,287	$ 1,278,950	$ 824,855
8	Total	490,675,042 kWh		$ 35,780,267		$ 8,571,787	$ 1,907,745	$ 1,511,308
	Residential TOU							
9	Service Availability Charge	132 Bills	$ 10.95 / Month	$ 1,445				$ 47
10	Energy Charge - Off-Peak	164,168 kWh	$ 0.060574 / kWh	$ 9,944	$ 0.016803	$ 2,759	$ 638	$ 436
11	Energy Charge - On-Peak	13,533 kWh	$ 0.219953 / kWh	$ 2,977	$ 0.017797	$ 241	$ 53	$ 107
12	Total	177,701 kWh		$ 14,366		$ 3,000	$ 691	$ 590
	Total Residential Service							
13	Base Rate Revenue	1,141,352,776 kWh		$ 93,951,944		$ 19,904,173	$ 4,437,580	$ 3,864,655

SOUTHWESTERN PUBLIC SERVICE COMPANY
New Mexico Retail
Proof of Revenue Analysis - Proposed Rates
12 Months Ended March 31, 2019

Base Rate Revenue at Proposed Base Rates

Line No.	Rate Class	Billing Units	Rate	Revenue - $	FPPCAC	Adjusted Fuel Revenue	RPS Revenue, at $0.003888 per kWh	EER Revenue at 3.267%
	Commercial & Industrial Service							
	Small Commercial Service							
	SGS - Small General Service							
14	Service Availability Charge	141,924 Bills	$ 16.30 / Month	$ 2,313,361				$ 75,578
15	Energy Charge - Summer	59,424,567 kWh	$ 0.066187 / kWh	$ 3,933,146	$ 0.016803	$ 998,511	$ 231,043	$ 168,665
16	Energy Charge - Winter	98,860,363 kWh	$ 0.055156 / kWh	$ 5,452,742	$ 0.017797	$ 1,759,418	$ 384,369	$ 248,179
17	Total	158,284,930 kWh		$ 11,699,249		$ 2,757,929	$ 615,412	$ 492,422
	SGS - Small General Service TOU							
18	Service Availability Charge	0 Bills	$ 17.30 / Month	$ -				$ -
19	Energy Charge - Off-Peak	0 kWh	$ 0.043964 / kWh	$ -	$ 0.016803	$ -	$ -	$ -
20	Energy Charge - On-Peak	0 kWh	$ 0.219095 / kWh	$ -	$ 0.017797	$ -	$ -	$ -
21	Total	0 kWh		$ -		$ -	$ -	$ -
	Total Small Commercial Service							
22	Base Rate Revenue	158,284,930 kWh		$ 11,699,249		$ 2,757,929	$ 615,412	$ 492,422

SOUTHWESTERN PUBLIC SERVICE COMPANY
New Mexico Retail
Proof of Revenue Analysis - Proposed Rates
12 Months Ended March 31, 2019

Base Rate Revenue at Proposed Base Rates

Line No.	Rate Class	Billing Units		Rate		Revenue - $	FPPCAC	Adjusted Fuel Revenue	RPS Revenue, at $0.003888 per kWh	EER Revenue at 3.267%
	Commercial & Industrial Service (Continued)									
	SG - Secondary General Service									
23	Service Availability Charge	45,984	Bills	$ 32.20	/ Month	$ 1,480,685				$ 48,374
24	Demand Charge - Summer	778,495	kW-Mo	$ 18.91	/ kW-Mo	$ 14,721,344				$ 480,946
25	Demand Charge - Winter	1,429,619	kW-Mo	$ 15.75	/ kW-Mo	$ 22,516,500				$ 735,614
26	Energy Charge	781,601,740	kWh	$ 0.010061	/ kWh	$ 7,863,695	$ 0.017448	$ 13,637,387	$ 3,038,868	$ 801,720
27	Power Factor Charge	107,948	kVar	$ 0.64	/ kVar	$ 69,087				$ 2,257
28	Power Factor Credit	10,010	kVar	$ (0.64)	/ kVar	$ (6,406)				$ (209)
29	Total	781,601,740	kWh			$ 46,644,904		$ 13,637,387	$ 3,038,868	$ 2,068,702
	SG - Secondary General Service TOU									
30	Service Availability Charge	12	Bills	$ 34.20	/ Month	$ 410				$ 13
31	Energy Charge - Off-Peak	184,266	kWh	$ 0.010061	/ kW-Mo	$ 1,854	$ 0.016803	$ 3,096	$ 716	$ 185
32	Energy Charge - On-Peak	20,341	kWh	$ 0.157302	/ kW-Mo	$ 3,200	$ 0.017797	$ 362	$ 79	$ 119
33	Demand Charge	1,623	kW-Mo	$ 12.70	/ kWh	$ 20,612				$ 673
34	Power Factor Charge	0	kVar	$ 0.64	/ kVar	$ -				$ -
35	Power Factor Credit	0	kVar	$ (0.64)	/ kVar	$ -				$ -
36	Total	204,607	kWh			$ 26,076		$ 3,458	$ 796	$ 991
	IR - Irrigation Service									
37	Service Availability Charge	12,072	Bills	$ 23.40	/ Month	$ 282,485				$ 9,229
38	Demand Charge - Summer	116,842	kW-Mo	$ 2.27	/ kW-Mo	$ 265,232				$ 8,665
39	Demand Charge - Winter	169,952	kW-Mo	$ 1.89	/ kW-Mo	$ 321,210				$ 10,494
40	Energy Charge	71,500,487	kWh	$ 0.055728	/ kWh	$ 3,984,579	$ 0.017448	$ 1,247,540	$ 277,994	$ 180,015
41	Total	71,500,487	kWh			$ 4,853,506		$ 1,247,540	$ 277,994	$ 208,403

SOUTHWESTERN PUBLIC SERVICE COMPANY
New Mexico Retail
Proof of Revenue Analysis - Proposed Rates
12 Months Ended March 31, 2019

Base Rate Revenue at Proposed Base Rates

Line No.	Rate Class	Billing Units		Rate		Revenue - $	FPPCAC	Adjusted Fuel Revenue	RPS Revenue, at $0.003888 per kWh	EER Revenue at 3.267%
	IR - Irrigation Service TOU									
42	Service Availability Charge	0	Bills	$ 24.40	/ Month	$ -				
43	Energy Charge - Off-Peak	0	kWh	$ 0.037527	/ kWh	$ -				$ -
44	Energy Charge - On-Peak	0	kWh	$ 0.235479	/ kWh	$ -	$ 0.016803	$ -	$ -	$ -
45	Demand Charge - Summer	0	kW-Mo	$ 1.80	/ kW-Mo	$ -	$ 0.017797	$ -	$ -	$ -
46	Demand Charge - Winter	0	kW-Mo	$ 1.80	/ kW-Mo	$ -				$ -
47	Total	0	kWh			$ -		$ -	$ -	$ -
	PG - Primary General Service									
48	Customer Months	57,876	Bills	$ 38.30	/ Month	$ 2,216,651				$ 65,321
49	Demand Charge - Summer	1,299,948	kW-Mo	$ 17.14	/ kW-Mo	$ 22,281,115				$ 656,589
50	Demand Charge - Winter	2,759,252	kW-Mo	$ 14.29	/ kW-Mo	$ 39,429,704				$ 1,161,931
51	Energy Charge	1,840,440,755	kWh	$ 0.009914	/ kWh	$ 18,246,130	$ 0.017123	$ 31,513,867	$ 7,155,634	$ 1,677,213
52	Power Factor Charge	555,196	kVar	$ 0.63	/ kVar	$ 349,773				$ 10,307
53	Power Factor Credit	117,913	kVar	$ (0.63)	/ kVar	$ (74,285)				$ (2,189)
54	Total	1,840,440,755	kWh			$ 82,449,088		$ 31,513,867	$ 7,155,634	$ 3,569,172
	PG - Primary General Service TOU									
55	Customer Months	0	Bills	$ 40.30	/ Month	$ -				$ -
56	Energy Charge - Off-Peak	0	kWh	$ 0.009914	/ kW-Mo	$ -	$ 0.017464	$ -	$ -	$ -
57	Energy Charge - On-Peak	0	kWh	$ 0.130649	/ kW-Mo	$ -	$ 0.016489	$ -	$ -	$ -
58	Demand Charge	0	kW-Mo	$ 11.61	/ kWh	$ -				$ -
59	Power Factor Charge	0	kVar	$ 0.63	/ kVar	$ -				$ -
60	Power Factor Credit	0	kVar	$ (0.63)	/ kVar	$ -				$ -
61	Total	0	kWh			$ -		$ -	$ -	$ -

SOUTHWESTERN PUBLIC SERVICE COMPANY
New Mexico Retail
Proof of Revenue Analysis - Proposed Rates
12 Months Ended March 31, 2019

Base Rate Revenue at Proposed Base Rates

Line No.	Rate Class	Billing Units		Rate		Revenue - $	FPPCAC	Adjusted Fuel Revenue	RPS Revenue, at $0.003888 per kWh	EER Revenue at 3.267%
	LGS-T - Large General Service - Transmission									
62	Service Availability Billing Charge	60	Bills	$ 1,153.70	/ Month	$ 69,222				$ 931
63	Demand Charge - Summer	98,678	kW-Mo	$ 12.60	/ kW-Mo	$ 1,243,343				$ 16,727
64	Demand Charge - Winter	198,259	kW-Mo	$ 10.49	/ kW-Mo	$ 2,079,737				$ 27,979
65	Energy Charge	155,464,643	kWh	$ 0.009278	/ kWh	$ 1,442,401	$ 0.016039	$ 2,493,497	$ 604,447	$ 61,081
66	Power Factor Charge	163,709	kVar	$ 0.73	/ kVar	$ 119,508				$ 1,608
67	Power Factor Credit		kVar	$ (0.73)	/ kVar	$ -				$ -
68	Total	155,464,643	kWh			$ 4,954,210		$ 2,493,497	$ 604,447	$ 108,325
	LGS-T - Large General Service - Backbone Transmission									
69	Service Availability Billing Charge	348	Bills	$ 1,153.70	/ Month	$ 401,488				$ 6,259
70	Demand Charge - Summer	1,311,070	kW-Mo	$ 12.51	/ kW-Mo	$ 16,401,480				$ 255,685
71	Demand Charge - Winter	2,596,655	kW-Mo	$ 10.43	/ kW-Mo	$ 27,083,114				$ 422,202
72	Energy Charge	2,407,890,961	kWh	$ 0.009221	/ kWh	$ 22,203,163	$ 0.015942	$ 38,386,598	$ 9,361,880	$ 1,090,484
73	Power Factor Charge	691,351	kVar	$ 0.73	/ kVar	$ 504,686				$ 7,868
74	Power Factor Credit	214,389	kVar	$ (0.73)	/ kVar	$ (156,504)				$ (2,440)
75	Total	2,407,890,961	kWh			$ 66,437,427		$ 38,386,598	$ 9,361,880	$ 1,780,057
76	**Total Commercial & Industrial - General Service at Present Rates**	5,257,103,193	kWh			$ 205,365,212		$ 87,282,347	$ 20,439,617	$ 7,735,650
	Total Commercial & Industrial Service									
77	Base Rate Revenue	5,257,103,193	kWh			$ 205,365,212		$ 87,282,347	$ 20,439,617	$ 7,735,650

SOUTHWESTERN PUBLIC SERVICE COMPANY
New Mexico Retail
Proof of Revenue Analysis - Proposed Rates
12 Months Ended March 31, 2019

Base Rate Revenue at Proposed Base Rates

Line No.	Rate Class	Billing Units		Rate		Revenue - $	FPPCAC	Adjusted Fuel Revenue	RPS Revenue, at $0.003888 per kWh	EER Revenue at 3.267%
	Public Authority Service									
	Large Municipal and School Service									
78	Service Availability Charge	6,804	Bills	$ 39.20	/ Month	$ 266,717				$ 8,714
79	Demand Charge - Summer	169,956	kW-Mo	$ 14.54	/ kW-Mo	$ 2,471,155				$ 80,733
80	Demand Charge - Winter	274,744	kW-Mo	$ 12.12	/ kW-Mo	$ 3,329,895				$ 108,788
81	Energy Charge	119,766,191	kWh	$ 0.010025	/ kWh	$ 1,200,656	$ 0.017448	$ 2,089,680	$ 465,651	$ 122,708
82	Power Factor Charge	10,992	kVar	$ 0.70	/ kVar	$ 7,694				$ 251
83	Power Factor Credit	2,736	kVar	$ (0.70)	/ kVar	$ (1,915)				$ (63)
84	Total	119,766,191	kWh			$ 7,274,202		$ 2,089,680	$ 465,651	$ 321,131
	Large Municipal and School Service TOU									
85	Service Availability Charge	0	Bills	$ 41.20	/ Month	$ -				$ -
86	Energy Charge - Off-Peak	0	kWh	$ 0.010025	/ kW-Mo	$ -	$ 0.017797	$ -	$ -	$ -
87	Energy Charge - On-Peak	0	kWh	$ 0.163656	/ kW-Mo	$ -	$ 0.016803	$ -	$ -	$ -
88	Demand Charge	0	kW-Mo	$ 9.25	/ kWh	$ -				$ -
89	Power Factor Charge	0	kVar	$ 0.70	/ kVar	$ -				$ -
90	Power Factor Credit	0	kVar	$ (0.70)	/ kVar	$ -				$ -
91	Total	0	kWh			$ -		$ -	$ -	$ -

SOUTHWESTERN PUBLIC SERVICE COMPANY
New Mexico Retail
Proof of Revenue Analysis - Proposed Rates
12 Months Ended March 31, 2019

Base Rate Revenue at Proposed Base Rates

Line No.	Rate Class	Billing Units		Rate		Revenue - $	FPPCAC	Adjusted Fuel Revenue	RPS Revenue, at $0.003888 per kWh	EER Revenue at 3.267%
	Small Municipal and School Service									
92	Service Availability Charge	14,040	Bills	$ 16.10	/ Month	$ 226,044				$ 7,385
93	Energy Charge - Summer	4,131,163	kWh	$ 0.055193	/ kWh	$ 228,010	$ 0.016803	$ 69,416	$ 16,062	$ 10,242
94	Energy Charge - Winter	7,389,189	kWh	$ 0.045994	/ kWh	$ 339,858	$ 0.017797	$ 131,505	$ 28,729	$ 16,338
95	Total	11,520,352	kWh			$ 793,913		$ 200,921	$ 44,791	$ 33,965
	Small Municipal and School Service TOU									
96	Service Availability Charge	0	Bills	$ 17.10	/ Month	$ -				$ -
97	Energy Charge - Off-Peak	0	kWh	$ 0.037156	/ kWh	$ -	$ 0.017797	$ -	$ -	$ -
98	Energy Charge - On-Peak	0	kWh	$ 0.198270	/ kWh	$ -	$ 0.016803	$ -	$ -	$ -
99	Total	0	kWh			$ -		$ -	$ -	$ -
	Total Public Authority Service									
100	Base Rate Revenue	131,286,543	kWh			$ 8,068,115		$ 2,290,601	$ 510,442	$ 355,095

SOUTHWESTERN PUBLIC SERVICE COMPANY
New Mexico Retail
Proof of Revenue Analysis - Proposed Rates
12 Months Ended March 31, 2019

Base Rate Revenue at Proposed Base Rates

Line No.	Rate Class			Billing Units		Rate		Revenue - $	FPPCAC	Adjusted Fuel Revenue	RPS Revenue, at $0.003888 per kWh	EER Revenue at 3.267%
	Street and Area Lighting Service											
	Area Lights											
101	7,000	MV	175 watt	30,066		$ 12.27	$	368,909				
102	15,000	HPS	150 watt	106,986		$ 11.74	$	1,256,014				
103	27,500	HPS	250 watt	611		$ 13.56	$	8,282				
104	50,000	HPS	400 watt	8,482		$ 16.24	$	137,754				
105	140,000	HPS	1,000 watt	9,577		$ 25.76	$	246,693				
106	14,000	MTHL	175 watt	120		$ 13.04	$	1,565				
107	20,500	MTHL	250 watt	144		$ 14.58	$	2,100				
108	36,000	MTHL	400 watt	2,977		$ 16.28	$	48,473				
109	110,000	MTHL	1,000 watt	5,661		$ 27.42	$	155,216				
110	Subtotal			164,624	lights		$	2,225,004	0.017448	$ 268,158	$ 59,755	$ 83,404
				15,369,008	kWh							
	Street Lights											
111	7,000	MV	175 watt	54,474		$ 12.86	$	700,536				
112	20,000	MV	400 watt	13,519		$ 16.79	$	226,978				
113	35,000	MV	700 watt	348		$ 23.25	$	8,091				
114	50,000	MV	1,000 watt	144		$ 26.85	$	3,866				
115	15,000	HPS	150 watt	42,061		$ 12.33	$	518,612				
116	27,500	HPS	250 watt	41,534		$ 14.25	$	591,855				
117	50,000	HPS	400 watt	6,829		$ 17.05	$	116,434				
118	Subtotal			158,908	lights		$	2,166,373	0.017448	$ 233,095	$ 51,941	$ 80,088
				13,359,432	kWh							

SOUTHWESTERN PUBLIC SERVICE COMPANY
New Mexico Retail
Proof of Revenue Analysis - Proposed Rates
12 Months Ended March 31, 2019

Base Rate Revenue at Proposed Base Rates

Line No.	Rate Class	Billing Units		Rate	Revenue - $	FPPCAC	Adjusted Fuel Revenue	RPS Revenue, at $0.003888 per kWh	EER Revenue at 3.267%
	LED Lights								
119									
120	6,000 LED	-		$ 11.52	$ -				
121	14,000 LED	-		$ 15.12	$ -				
122	25,000 LED	-		$ 21.95	$ -				
123	Subtotal	-	lights		$ -	0.017448	$ -	$ -	$ -
		-	kWh						
124	**Customer-Owned Street Lighting Facilities**	-	kWh	$ 0.052912	$ -	0.017448	$ -	$ -	$ -
	Total Lighting Service	323,532	Lights						
125	Base Rate Revenue	28,728,440	kWh		$ 4,391,377		$ 501,254	$ 111,696	$ 163,491
	Total Company								
126	**Total NM Retail Revenue Requirement**	**6,716,755,882**	**kWh**		**$ 323,475,897**		**$ 112,736,304**	**$ 26,114,747**	**$ 12,611,313**

SOUTHWESTERN PUBLIC SERVICE COMPANY
Bill Comparison Summary
Typical Monthly Bills by Rate Class

Description	Monthly Bill at Present Rates	Monthly Bill at Proposed Rates	$ Change	% Change
Residential Service (Summer)				
0 kWh	$ 9.04	$ 10.28	$ 1.24	13.7%
250 kWh	$ 34.51	$ 38.14	$ 3.63	10.5%
500 kWh	$ 59.99	$ 66.01	$ 6.02	10.0%
750 kWh	$ 85.46	$ 93.88	$ 8.42	9.9%
900 kWh	$ 100.75	$ 110.61	$ 9.86	9.8%
1,000 kWh	$ 110.94	$ 121.75	$ 10.81	9.7%
2,000 kWh	$ 212.84	$ 233.23	$ 20.39	9.6%
Residential Service (Non-Summer)				
0 kWh	$ 9.04	$ 10.28	$ 1.24	13.7%
250 kWh	$ 32.13	$ 34.65	$ 2.52	7.8%
500 kWh	$ 55.22	$ 59.02	$ 3.80	6.9%
750 kWh	$ 78.32	$ 83.39	$ 5.07	6.5%
900 kWh	$ 92.17	$ 98.01	$ 5.84	6.3%
1,000 kWh	$ 101.41	$ 107.76	$ 6.35	6.3%
2,000 kWh	$ 193.78	$ 205.25	$ 11.47	5.9%
Residential Service Annualized				
0 kWh	$ 9.04	$ 10.28	$ 1.24	13.7%
250 kWh	$ 32.92	$ 35.81	$ 2.89	8.8%
500 kWh	$ 56.81	$ 61.35	$ 4.54	8.0%
750 kWh	$ 80.70	$ 86.89	$ 6.19	7.7%
900 kWh	$ 95.03	$ 102.21	$ 7.18	7.6%
1,000 kWh	$ 104.59	$ 112.42	$ 7.83	7.5%
2,000 kWh	$ 200.13	$ 214.58	$ 14.45	7.2%

SOUTHWESTERN PUBLIC SERVICE COMPANY
Bill Comparison Summary
Typical Monthly Bills by Rate Class

Description	Monthly Bill at Present Rates	Monthly Bill at Proposed Rates	$ Change	% Change
Residential Service TOU (Summer)				
0 kWh	$ 10.07	$ 11.31	$ 1.24	12.3%
250 kWh	$ 38.58	$ 42.57	$ 3.99	10.3%
500 kWh	$ 67.09	$ 73.84	$ 6.75	10.1%
750 kWh	$ 95.60	$ 105.11	$ 9.51	9.9%
1,000 kWh	$ 124.11	$ 136.37	$ 12.26	9.9%
2,000 kWh	$ 238.15	$ 261.44	$ 23.29	9.8%
Residential Service TOU (Non-Summer)				
0 kWh	$ 10.07	$ 11.31	$ 1.24	12.3%
250 kWh	$ 30.43	$ 32.54	$ 2.11	6.9%
500 kWh	$ 50.79	$ 53.78	$ 2.99	5.9%
750 kWh	$ 71.16	$ 75.02	$ 3.86	5.4%
1,000 kWh	$ 91.52	$ 96.25	$ 4.73	5.2%
2,000 kWh	$ 172.97	$ 181.20	$ 8.23	4.8%
Residential Service TOU Annualized				
0 kWh	$ 10.07	$ 11.31	$ 1.24	12.3%
250 kWh	$ 33.15	$ 35.88	$ 2.73	8.2%
500 kWh	$ 56.22	$ 60.47	$ 4.25	7.6%
750 kWh	$ 79.31	$ 85.05	$ 5.74	7.2%
1,000 kWh	$ 102.38	$ 109.62	$ 7.24	7.1%
2,000 kWh	$ 194.70	$ 207.95	$ 13.25	6.8%

SOUTHWESTERN PUBLIC SERVICE COMPANY
Bill Comparison Summary
Typical Monthly Bills by Rate Class

Description	Monthly Bill at Present Rates	Monthly Bill at Proposed Rates	$ Change	% Change
Residential Heat Service (Summer)				
0 kWh	$ 9.04	$ 10.28	$ 1.24	13.7%
250 kWh	$ 34.51	$ 38.14	$ 3.63	10.5%
500 kWh	$ 59.99	$ 66.01	$ 6.02	10.0%
750 kWh	$ 85.46	$ 93.88	$ 8.42	9.9%
1,000 kWh	$ 110.94	$ 121.75	$ 10.81	9.7%
2,000 kWh	$ 212.84	$ 233.23	$ 20.39	9.6%
Residential Heat Service (Non-Summer)				
0 kWh	$ 9.04	$ 10.28	$ 1.24	13.7%
250 kWh	$ 28.24	$ 30.09	$ 1.85	6.6%
500 kWh	$ 47.44	$ 49.91	$ 2.47	5.2%
750 kWh	$ 66.65	$ 69.72	$ 3.07	4.6%
1,000 kWh	$ 85.85	$ 89.54	$ 3.69	4.3%
2,000 kWh	$ 162.67	$ 168.80	$ 6.13	3.8%
Residential Heat Service Annualized				
0 kWh	$ 9.04	$ 10.28	$ 1.24	13.7%
250 kWh	$ 30.33	$ 32.77	$ 2.44	8.0%
500 kWh	$ 51.62	$ 55.28	$ 3.66	7.1%
750 kWh	$ 72.92	$ 77.77	$ 4.85	6.7%
1,000 kWh	$ 94.21	$ 100.28	$ 6.07	6.4%
2,000 kWh	$ 179.39	$ 190.28	$ 10.89	6.1%

SOUTHWESTERN PUBLIC SERVICE COMPANY
Bill Comparison Summary
Typical Monthly Bills by Rate Class

Description	Monthly Bill at Present Rates	Monthly Bill at Proposed Rates	$ Change	% Change
Small General Service (Summer)				
0 kWh	$ 14.87	$ 16.83	$ 1.96	13.2%
250 kWh	$ 35.51	$ 39.26	$ 3.75	10.6%
500 kWh	$ 56.15	$ 61.69	$ 5.54	9.9%
750 kWh	$ 76.79	$ 84.12	$ 7.33	9.5%
1,000 kWh	$ 97.44	$ 106.55	$ 9.11	9.3%
2,000 kWh	$ 180.00	$ 196.27	$ 16.27	9.0%
Small General Service (Non-Summer)				
0 kWh	$ 14.87	$ 16.83	$ 1.96	13.2%
250 kWh	$ 33.96	$ 36.67	$ 2.71	8.0%
500 kWh	$ 53.05	$ 56.51	$ 3.46	6.5%
750 kWh	$ 72.14	$ 76.35	$ 4.21	5.8%
1,000 kWh	$ 91.23	$ 96.18	$ 4.95	5.4%
2,000 kWh	$ 167.58	$ 175.54	$ 7.96	4.7%
Small General Service Annualized				
0 kWh	$ 14.87	$ 16.83	$ 1.96	13.2%
250 kWh	$ 34.48	$ 37.53	$ 3.05	8.8%
500 kWh	$ 54.08	$ 58.24	$ 4.16	7.7%
750 kWh	$ 73.69	$ 78.94	$ 5.25	7.1%
1,000 kWh	$ 93.30	$ 99.64	$ 6.34	6.8%
2,000 kWh	$ 171.72	$ 182.45	$ 10.73	6.2%

SOUTHWESTERN PUBLIC SERVICE COMPANY
Bill Comparison Summary
Typical Monthly Bills by Rate Class

Description	Monthly Bill at Present Rates	Monthly Bill at Proposed Rates	$ Change	% Change
Small General Service (TOU) Summer				
0 kWh	$ 15.90	$ 17.87	$ 1.97	12.4%
250 kWh	$ 39.49	$ 43.60	$ 4.11	10.4%
500 kWh	$ 63.08	$ 69.33	$ 6.25	9.9%
750 kWh	$ 86.66	$ 95.07	$ 8.41	9.7%
1,000 kWh	$ 110.25	$ 120.80	$ 10.55	9.6%
2,000 kWh	$ 204.60	$ 223.74	$ 19.14	9.4%
Small General Service (TOU) Non-Summer				
0 kWh	$ 15.90	$ 17.87	$ 1.97	12.4%
250 kWh	$ 32.49	$ 34.81	$ 2.32	7.1%
500 kWh	$ 49.07	$ 51.76	$ 2.69	5.5%
750 kWh	$ 65.66	$ 68.71	$ 3.05	4.6%
1,000 kWh	$ 82.24	$ 85.66	$ 3.42	4.2%
2,000 kWh	$ 148.58	$ 153.45	$ 4.87	3.3%
Small General Service (TOU) Annualized				
0 kWh	$ 15.90	$ 17.87	$ 1.97	12.4%
250 kWh	$ 34.82	$ 37.74	$ 2.92	8.4%
500 kWh	$ 53.74	$ 57.62	$ 3.88	7.2%
750 kWh	$ 72.66	$ 77.50	$ 4.84	6.7%
1,000 kWh	$ 91.58	$ 97.37	$ 5.79	6.3%
2,000 kWh	$ 167.25	$ 176.88	$ 9.63	5.8%

SOUTHWESTERN PUBLIC SERVICE COMPANY
Bill Comparison Summary
Typical Monthly Bills by Rate Class

Description	Monthly Bill at Present Rates	Monthly Bill at Proposed Rates	$ Change	% Change
Secondary General Service (Summer)				
1,500 kWh and 12 kW	$ 305.47	$ 316.22	$ 10.75	3.5%
7,500 kWh and 35 kW	$ 929.79	$ 959.90	$ 30.11	3.2%
15,000 kWh and 35 kW	$ 1,161.23	$ 1,203.07	$ 41.84	3.6%
30,000 kWh and 100 kW	$ 2,865.24	$ 2,958.71	$ 93.47	3.3%
Secondary General Service (Non-Summer)				
1,500 kWh and 12 kW	$ 267.18	$ 277.06	$ 9.88	3.7%
7,500 kWh and 35 kW	$ 818.10	$ 845.68	$ 27.58	3.4%
15,000 kWh and 35 kW	$ 1,049.55	$ 1,088.85	$ 39.30	3.7%
30,000 kWh and 100 kW	$ 2,546.14	$ 2,632.39	$ 86.25	3.4%
Secondary General Service Annualized				
1,500 kWh and 12 kW	$ 279.94	$ 290.11	$ 10.17	3.6%
7,500 kWh and 35 kW	$ 855.33	$ 883.75	$ 28.42	3.3%
15,000 kWh and 35 kW	$ 1,086.78	$ 1,126.92	$ 40.14	3.7%
30,000 kWh and 100 kW	$ 2,652.51	$ 2,741.16	$ 88.65	3.3%
Secondary General Service (TOU) Summer				
1,500 kWh and 12 kW	$ 288.07	$ 298.35	$ 10.28	3.6%
7,500 kWh and 35 kW	$ 991.22	$ 1,022.61	$ 31.39	3.2%
15,000 kWh and 35 kW	$ 1,501.43	$ 1,550.87	$ 49.44	3.3%
30,000 kWh and 100 kW	$ 3,355.51	$ 3,459.88	$ 104.37	3.1%
Secondary General Service (TOU) Non-Summer				
1,500 kWh and 12 kW	$ 232.31	$ 241.33	$ 9.02	3.9%
7,500 kWh and 35 kW	$ 712.46	$ 737.51	$ 25.05	3.5%
15,000 kWh and 35 kW	$ 943.91	$ 980.68	$ 36.77	3.9%
30,000 kWh and 100 kW	$ 2,240.47	$ 2,319.49	$ 79.02	3.5%
Secondary General Service (TOU) Annualized				
1,500 kWh and 12 kW	$ 250.90	$ 260.34	$ 9.44	3.8%
7,500 kWh and 35 kW	$ 805.38	$ 832.54	$ 27.16	3.4%
15,000 kWh and 35 kW	$ 1,129.75	$ 1,170.74	$ 40.99	3.6%
30,000 kWh and 100 kW	$ 2,612.15	$ 2,699.62	$ 87.47	3.3%

SOUTHWESTERN PUBLIC SERVICE COMPANY
Bill Comparison Summary
Typical Monthly Bills by Rate Class

Description	Monthly Bill at Present Rates	Monthly Bill at Proposed Rates	$ Change	% Change
Irrigation Service (Summer)				
1,500 kWh and 12 kW	$ 158.91	$ 171.67	$ 12.76	8.0%
7,500 kWh and 35 kW	$ 655.41	$ 703.07	$ 47.66	7.3%
15,000 kWh and 35 kW	$ 1,220.51	$ 1,299.94	$ 79.43	6.5%
30,000 kWh and 100 kW	$ 2,476.23	$ 2,646.03	$ 169.80	6.9%
Irrigation Service (Non-Summer)				
1,500 kWh and 12 kW	$ 154.20	$ 166.96	$ 12.76	8.3%
7,500 kWh and 35 kW	$ 641.67	$ 689.34	$ 47.67	7.4%
15,000 kWh and 35 kW	$ 1,206.77	$ 1,286.20	$ 79.43	6.6%
30,000 kWh and 100 kW	$ 2,436.99	$ 2,606.79	$ 169.80	7.0%
Irrigation Service Annualized				
1,500 kWh and 12 kW	$ 155.77	$ 168.53	$ 12.76	8.2%
7,500 kWh and 35 kW	$ 646.25	$ 693.92	$ 47.67	7.4%
15,000 kWh and 35 kW	$ 1,211.35	$ 1,290.78	$ 79.43	6.6%
30,000 kWh and 100 kW	$ 2,450.07	$ 2,619.87	$ 169.80	6.9%
Irrigation Service (TOU) Summer				
1,500 kWh and 12 kW	$ 192.55	$ 215.34	$ 22.79	11.8%
7,500 kWh and 35 kW	$ 829.54	$ 929.44	$ 99.90	12.0%
15,000 kWh and 35 kW	$ 1,581.84	$ 1,768.62	$ 186.78	11.8%
30,000 kWh and 100 kW	$ 3,185.78	$ 3,567.80	$ 382.02	12.0%
Irrigation Service (TOU) Non-Summer				
1,500 kWh and 12 kW	$ 126.92	$ 138.68	$ 11.76	9.3%
7,500 kWh and 35 kW	$ 501.38	$ 546.15	$ 44.77	8.9%
15,000 kWh and 35 kW	$ 925.51	$ 1,002.05	$ 76.54	8.3%
30,000 kWh and 100 kW	$ 1,873.12	$ 2,034.66	$ 161.54	8.6%
Irrigation Service (TOU) Annualized				
1,500 kWh and 12 kW	$ 148.80	$ 164.23	$ 15.43	10.4%
7,500 kWh and 35 kW	$ 610.77	$ 673.91	$ 63.14	10.3%
15,000 kWh and 35 kW	$ 1,144.29	$ 1,257.57	$ 113.28	9.9%
30,000 kWh and 100 kW	$ 2,310.67	$ 2,545.71	$ 235.04	10.2%

SOUTHWESTERN PUBLIC SERVICE COMPANY
Bill Comparison Summary
Typical Monthly Bills by Rate Class

Description	Monthly Bill at Present Rates	Monthly Bill at Proposed Rates	$ Change	% Change
Primary General Service (Summer)				
1,500 kWh and 12 kW	$ 289.06	$ 299.85	$ 10.79	3.7%
7,500 kWh and 35 kW	$ 872.27	$ 898.56	$ 26.29	3.0%
15,000 kWh and 35 kW	$ 1,099.53	$ 1,138.08	$ 38.55	3.5%
30,000 kWh and 100 kW	$ 2,688.44	$ 2,767.61	$ 79.17	2.9%
Primary General Service (Non-Summer)				
1,500 kWh and 12 kW	$ 254.11	$ 264.54	$ 10.43	4.1%
7,500 kWh and 35 kW	$ 770.34	$ 795.56	$ 25.22	3.3%
15,000 kWh and 35 kW	$ 997.61	$ 1,035.07	$ 37.46	3.8%
30,000 kWh and 100 kW	$ 2,397.23	$ 2,473.30	$ 76.07	3.2%
Primary General Service Annualized				
1,500 kWh and 12 kW	$ 265.76	$ 276.31	$ 10.55	4.0%
7,500 kWh and 35 kW	$ 804.32	$ 829.89	$ 25.57	3.2%
15,000 kWh and 35 kW	$ 1,031.58	$ 1,069.41	$ 37.83	3.7%
30,000 kWh and 100 kW	$ 2,494.30	$ 2,571.40	$ 77.10	3.1%
Primary General Service (TOU) Summer				
1,500 kWh and 12 kW	$ 269.53	$ 280.15	$ 10.62	3.9%
7,500 kWh and 35 kW	$ 907.33	$ 934.53	$ 27.20	3.0%
15,000 kWh and 35 kW	$ 1,364.93	$ 1,407.82	$ 42.89	3.1%
30,000 kWh and 100 kW	$ 3,048.03	$ 3,133.70	$ 85.67	2.8%
Primary General Service (TOU) Non-Summer				
1,500 kWh and 12 kW	$ 223.46	$ 233.39	$ 9.93	4.4%
7,500 kWh and 35 kW	$ 676.99	$ 700.76	$ 23.77	3.5%
15,000 kWh and 35 kW	$ 904.25	$ 940.27	$ 36.02	4.0%
30,000 kWh and 100 kW	$ 2,126.67	$ 2,198.61	$ 71.94	3.4%
Primary General Service (TOU) Annualized				
1,500 kWh and 12 kW	$ 238.82	$ 248.98	$ 10.16	4.3%
7,500 kWh and 35 kW	$ 753.77	$ 778.68	$ 24.91	3.3%
15,000 kWh and 35 kW	$ 1,057.81	$ 1,096.12	$ 38.31	3.6%
30,000 kWh and 100 kW	$ 2,433.79	$ 2,510.31	$ 76.52	3.1%

SOUTHWESTERN PUBLIC SERVICE COMPANY
Bill Comparison Summary
Typical Monthly Bills by Rate Class

Description	Monthly Bill at Present Rates	Monthly Bill at Proposed Rates	$ Change	% Change
Large General Service - Transmission Sub (Summer)				
500,000 kWh and 800 kW	$ 24,591.53	$ 26,680.27	$ 2,088.74	8.5%
1,000,000 kWh and 1,500 kW	$ 47,015.49	$ 50,867.98	$ 3,852.49	8.2%
4,000,000 kWh and 6,100 kW	$ 186,206.24	$ 201,198.92	$ 14,992.68	8.1%
8,000,000 kWh and 12,200 kW	$ 371,406.65	$ 401,206.44	$ 29,799.79	8.0%
Large General Service - Transmission Sub (Non-Summer)				
500,000 kWh and 800 kW	$ 23,038.39	$ 24,937.12	$ 1,898.73	8.2%
1,000,000 kWh and 1,500 kW	$ 44,103.36	$ 47,599.58	$ 3,496.22	7.9%
4,000,000 kWh and 6,100 kW	$ 174,363.58	$ 187,907.42	$ 13,543.84	7.8%
8,000,000 kWh and 12,200 kW	$ 347,721.33	$ 374,623.45	$ 26,902.12	7.7%
Large General Service - Transmission Sub Annualized				
500,000 kWh and 800 kW	$ 23,556.10	$ 25,518.17	$ 1,962.07	8.3%
1,000,000 kWh and 1,500 kW	$ 45,074.07	$ 48,689.05	$ 3,614.98	8.0%
4,000,000 kWh and 6,100 kW	$ 178,311.13	$ 192,337.92	$ 14,026.79	7.9%
8,000,000 kWh and 12,200 kW	$ 355,616.44	$ 383,484.45	$ 27,868.01	7.8%
Large General Service - Trans Backbone (Summer)				
500,000 kWh and 800 kW	$ 24,471.48	$ 26,526.40	$ 2,054.92	8.4%
1,000,000 kWh and 1,500 kW	$ 47,937.14	$ 51,861.41	$ 3,924.27	8.2%
4,000,000 kWh and 6,300 kW	$ 187,579.69	$ 202,579.60	$ 14,999.91	8.0%
8,000,000 kWh and 13,000 kW	$ 378,759.26	$ 409,135.28	$ 30,376.02	8.0%
Large General Service - Trans Backbone (Non-Summer)				
500,000 kWh and 800 kW	$ 22,951.39	$ 24,808.04	$ 1,856.65	8.1%
1,000,000 kWh and 1,500 kW	$ 44,896.96	$ 48,424.68	$ 3,527.72	7.9%
4,000,000 kWh and 6,300 kW	$ 175,608.98	$ 189,047.49	$ 13,438.51	7.7%
8,000,000 kWh and 13,000 kW	$ 354,057.79	$ 381,211.89	$ 27,154.10	7.7%
Large General Service - Trans Backbone Annualized				
500,000 kWh and 800 kW	$ 23,458.09	$ 25,380.83	$ 1,922.74	8.2%
1,000,000 kWh and 1,500 kW	$ 45,910.35	$ 49,570.26	$ 3,659.91	8.0%
4,000,000 kWh and 6,300 kW	$ 179,599.22	$ 193,558.19	$ 13,958.97	7.8%
8,000,000 kWh and 13,000 kW	$ 362,291.61	$ 390,519.69	$ 28,228.08	7.8%

SOUTHWESTERN PUBLIC SERVICE COMPANY
Bill Comparison Summary
Typical Monthly Bills by Rate Class

Description	Monthly Bill at Present Rates	Monthly Bill at Proposed Rates	$ Change	% Change
Large Municipal and School Service (Summer)				
10,000 kWh and 30 kW	$ 760.38	$ 814.79	$ 54.41	7.2%
20,000 kWh and 45 kW	$ 1,275.18	$ 1,363.87	$ 88.69	7.0%
30,000 kWh and 75 kW	$ 1,996.94	$ 2,138.17	$ 141.23	7.1%
Large Municipal and School Service (Non-Summer)				
10,000 kWh and 30 kW	$ 684.78	$ 739.82	$ 55.04	8.0%
20,000 kWh and 45 kW	$ 1,161.80	$ 1,251.41	$ 89.61	7.7%
30,000 kWh and 75 kW	$ 1,807.96	$ 1,950.74	$ 142.78	7.9%
Large Municipal and School Service Annualized				
10,000 kWh and 30 kW	$ 709.98	$ 764.81	$ 54.83	7.7%
20,000 kWh and 45 kW	$ 1,199.59	$ 1,288.90	$ 89.31	7.4%
30,000 kWh and 75 kW	$ 1,870.95	$ 2,013.22	$ 142.27	7.6%
Large Municipal and School Service (TOU) Summer				
10,000 kWh and 30 kW	$ 949.44	$ 1,002.00	$ 52.56	5.5%
20,000 kWh and 45 kW	$ 1,729.15	$ 1,818.17	$ 89.02	5.1%
30,000 kWh and 75 kW	$ 2,637.90	$ 2,777.62	$ 139.72	5.3%
Large Municipal and School Service (TOU) Non-Summer				
10,000 kWh and 30 kW	$ 606.61	$ 652.97	$ 46.36	7.6%
20,000 kWh and 45 kW	$ 1,043.50	$ 1,120.11	$ 76.61	7.3%
30,000 kWh and 75 kW	$ 1,609.43	$ 1,730.53	$ 121.10	7.5%
Large Municipal and School Service (TOU) Annualized				
10,000 kWh and 30 kW	$ 720.89	$ 769.31	$ 48.42	6.7%
20,000 kWh and 45 kW	$ 1,272.05	$ 1,352.80	$ 80.75	6.3%
30,000 kWh and 75 kW	$ 1,952.25	$ 2,079.56	$ 127.31	6.5%

SOUTHWESTERN PUBLIC SERVICE COMPANY
Bill Comparison Summary
Typical Monthly Bills by Rate Class

Description	Monthly Bill at Present Rates	Monthly Bill at Proposed Rates	$ Change	% Change
Small Municipal and School Service (Summer)				
500 kWh	$ 50.33	$ 55.81	$ 5.48	10.9%
1,000 kWh	$ 85.78	$ 94.99	$ 9.21	10.7%
2,000 kWh	$ 156.69	$ 173.35	$ 16.66	10.6%
Small Municipal and School Service (Non-Summer)				
500 kWh	$ 48.19	$ 51.57	$ 3.38	7.0%
1,000 kWh	$ 81.51	$ 86.52	$ 5.01	6.1%
2,000 kWh	$ 148.15	$ 156.41	$ 8.26	5.6%
Small Municipal and School Service Annualized				
500 kWh	$ 48.90	$ 52.98	$ 4.08	8.3%
1,000 kWh	$ 82.93	$ 89.34	$ 6.41	7.7%
2,000 kWh	$ 151.00	$ 162.06	$ 11.06	7.3%
Small Municipal and School Service (TOU) Summer				
500 kWh	$ 60.15	$ 64.16	$ 4.01	6.7%
1,000 kWh	$ 104.40	$ 110.67	$ 6.27	6.0%
2,000 kWh	$ 192.89	$ 203.68	$ 10.79	5.6%
Small Municipal and School Service (TOU) Non-Summer				
500 kWh	$ 45.41	$ 48.04	$ 2.63	5.8%
1,000 kWh	$ 74.92	$ 78.42	$ 3.50	4.7%
2,000 kWh	$ 133.94	$ 139.19	$ 5.25	3.9%
Small Municipal and School Service (TOU) Annualized				
500 kWh	$ 50.32	$ 53.41	$ 3.09	6.1%
1,000 kWh	$ 84.75	$ 89.17	$ 4.42	5.2%
2,000 kWh	$ 153.59	$ 160.69	$ 7.10	4.6%

SOUTHWESTERN PUBLIC SERVICE COMPANY
Bill Comparison Summary
Typical Monthly Bills by Rate Class

Description	Monthly Bill at Present Rates	Monthly Bill at Proposed Rates	$ Change	% Change
Area Lighting Service				
Summer				
7,000 MV	$ 12.78	$ 13.41	$ 0.63	4.9%
15,000 HPS	$ 12.06	$ 12.68	$ 0.62	5.2%
27,500 HPS	$ 14.56	$ 15.19	$ 0.63	4.3%
50,000 HPS	$ 18.28	$ 18.91	$ 0.63	3.5%
140,000 HPS	$ 30.90	$ 31.64	$ 0.74	2.4%
14,000 MTHL	$ 13.39	$ 14.08	$ 0.70	5.2%
20,500 MTHL	$ 15.51	$ 16.21	$ 0.70	4.5%
36,000 MTHL	$ 17.86	$ 18.57	$ 0.71	4.0%
110,000 MTHL	$ 32.63	$ 33.45	$ 0.82	2.5%
Non-Summer				
7,000 MV	$ 12.96	$ 13.48	$ 0.52	4.0%
15,000 HPS	$ 12.21	$ 12.74	$ 0.53	4.4%
27,500 HPS	$ 14.82	$ 15.29	$ 0.47	3.2%
50,000 HPS	$ 18.70	$ 19.07	$ 0.37	2.0%
140,000 HPS	$ 31.82	$ 31.99	$ 0.17	0.5%
14,000 MTHL	$ 13.55	$ 14.14	$ 0.59	4.4%
20,500 MTHL	$ 15.77	$ 16.31	$ 0.54	3.4%
36,000 MTHL	$ 18.21	$ 18.70	$ 0.49	2.7%
110,000 MTHL	$ 33.57	$ 33.81	$ 0.24	0.7%
Annualized				
7,000 MV	$ 12.90	$ 13.46	$ 0.56	4.3%
15,000 HPS	$ 12.16	$ 12.72	$ 0.56	4.6%
27,500 HPS	$ 14.73	$ 15.25	$ 0.52	3.5%
50,000 HPS	$ 18.56	$ 19.02	$ 0.46	2.5%
140,000 HPS	$ 31.52	$ 31.87	$ 0.36	1.1%
14,000 MTHL	$ 13.49	$ 14.12	$ 0.63	4.7%
20,500 MTHL	$ 15.68	$ 16.27	$ 0.59	3.8%
36,000 MTHL	$ 18.10	$ 18.66	$ 0.56	3.1%
110,000 MTHL	$ 33.26	$ 33.69	$ 0.43	1.3%

SOUTHWESTERN PUBLIC SERVICE COMPANY
Bill Comparison Summary
Typical Monthly Bills by Rate Class

Description	Monthly Bill at Present Rates	Monthly Bill at Proposed Rates	$ Change	% Change
Street Lighting Service				
Summer				
7,000 MV	$ 12.80	$ 14.00	$ 1.20	9.4%
20,000 MV	$ 17.94	$ 19.33	$ 1.39	7.7%
35,000 MV	$ 25.78	$ 27.57	$ 1.79	6.9%
50,000 MV	$ 31.07	$ 32.95	$ 1.88	6.1%
15,000 HPS	$ 12.10	$ 13.27	$ 1.17	9.7%
27,500 HPS	$ 14.61	$ 15.88	$ 1.27	8.7%
50,000 HPS	$ 18.33	$ 19.72	$ 1.39	7.6%
6,000 LED	$ 10.69	$ 11.87	$ 1.18	11.0%
14,000 LED	$ 14.49	$ 15.98	$ 1.49	10.3%
25,000 LED	$ 21.17	$ 23.31	$ 2.14	10.1%
Non-Summer				
7,000 MV	$ 12.98	$ 14.07	$ 1.09	8.4%
20,000 MV	$ 18.34	$ 19.48	$ 1.14	6.2%
35,000 MV	$ 26.46	$ 27.82	$ 1.37	5.2%
50,000 MV	$ 32.02	$ 33.31	$ 1.29	4.0%
15,000 HPS	$ 12.25	$ 13.33	$ 1.08	8.8%
27,500 HPS	$ 14.87	$ 15.98	$ 1.11	7.5%
50,000 HPS	$ 18.75	$ 19.88	$ 1.13	6.0%
6,000 LED	$ 10.75	$ 11.89	$ 1.15	10.7%
14,000 LED	$ 14.62	$ 16.03	$ 1.40	9.6%
25,000 LED	$ 21.38	$ 23.39	$ 2.01	9.4%
Annualized				
7,000 MV	$ 12.92	$ 14.05	$ 1.13	8.7%
20,000 MV	$ 18.21	$ 19.43	$ 1.22	6.7%
35,000 MV	$ 26.23	$ 27.74	$ 1.51	5.8%
50,000 MV	$ 31.70	$ 33.19	$ 1.49	4.7%
15,000 HPS	$ 12.20	$ 13.31	$ 1.11	9.1%
27,500 HPS	$ 14.78	$ 15.94	$ 1.16	7.9%
50,000 HPS	$ 18.61	$ 19.83	$ 1.22	6.6%
6,000 LED	$ 10.73	$ 11.89	$ 1.16	10.8%
14,000 LED	$ 14.58	$ 16.01	$ 1.43	9.8%
25,000 LED	$ 21.31	$ 23.36	$ 2.05	9.6%

Rate Design Workpapers

Attachment EDE-6(CD)

is provided in electronic

format in

Attachment WAG-1(CD) to the

Direct Testimony of William A. Grant