DOCKET NO. _____

APPLICATION OF SOUTHWESTERN PUBLIC SERVICE COMPANY FOR AUTHORITY TO CHANGE RATES	**§**	**PUBLIC UTILITY COMMISSION OF TEXAS**

DIRECT TESTIMONY
of
MICHAEL O. REMINGTON

on behalf of

SOUTHWESTERN PUBLIC SERVICE COMPANY

(Filename: RemingtonRRDirect.doc)

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GLOSSARY OF ACRONYMS AND DEFINED TERMS

Acronym/Defined Term	Meaning
ADMS	Advanced Distribution Management System
AGIS	Advanced Grid Intelligence & Security
CIP	Critical Infrastructure Protection
CLE	Continuing Legal Education
CRS	Customer Response System
EMS	Energy Management System
FERC	Federal Energy Regulatory Commission
IT	Information Technology
MSBA	Minnesota State Bar Association
NERC	North American Electric Reliability Corporation
O&M	operation and maintenance
Operating Companies	Northern States Power Company, a Minnesota corporation; Northern States Power Company, a Wisconsin corporation; Public Service Company of Colorado, a Colorado corporation; and SPS
PTT	Productivity Through Technology
SCADA	Supervisory Control and Data Acquisition
SPS	Southwestern Public Service Company, a New Mexico corporation
Test Year	October 1, 2019 through September 30, 2020
Total Company	Total SPS (before jurisdictional allocation)
Update Period	October 1, 2020 through December 31, 2020
Updated Test Year	January 1, 2020 through December 31, 2020
WAM	Work and Asset Management

Acronym/Defined Term	Meaning
WAN	wide area network
WBS	Work Breakdown Structure
Xcel Energy	Xcel Energy Inc.
XES	Xcel Energy Services Inc.

LIST OF ATTACHMENTS

Attachment	Description
MOR-RR-1	Business Systems Organization Chart (*Non-native format*)
MOR-RR-2	Business Systems Capital Additions for July 1, 2019 through September 30, 2020 (*Filename*: MOR-RR-2.xlsx)
MOR-RR-3	Business Systems Capital Additions for October 1, 2020 through December 31, 2020 (*Filename*: MOR-RR-3.xlsx)
MOR-RR-A (Updated Test Year)	Summary of XES Expenses to SPS by Affiliate Class and Billing Method (*Filename:* MOR-RR-ABCD.xlsx)
MOR-RR-B(CD) (Updated Test Year)	XES Expenses by Affiliate Class, Activity, Billing Method, and FERC Account (*Filename:* MOR-RR-ABCD.xlsx)
MOR-RR-C (Updated Test Year)	Exclusions from XES Expenses to SPS by Affiliate Class and FERC Account (*Filename:* MOR-RR-ABCD.xlsx)
MOR-RR-D (Updated Test Year)	Pro Forma Adjustments to XES Expenses by Affiliate Class and FERC Account (*Filename:* MOR-RR-ABCD.xlsx)

DIRECT TESTIMONY
OF
MICHAEL O. REMINGTON

I. WITNESS IDENTIFICATION AND QUALIFICATIONS

Q. Please state your name and business address.

A. My name is Michael O. Remington. My business address is 414 Nicollet Mall, Minneapolis, Minnesota 55401.

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

A. I am filing testimony on behalf of Southwestern Public Service Company, a Texas corporation ("SPS"), which is a 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 Xcel Energy Services Inc. ("XES"), the service company subsidiary of Xcel Energy, as Director of Information Technology ("IT") Operations.

Q. Please briefly outline your responsibilities as Director of IT Operations.

A. As Director of IT Operations I lead a team of professionals that are responsible for managing major incidents, monitoring IT infrastructure and applications, disaster recovery planning, and operating several core IT service management processes. In this testimony I represent the XES Business Systems organization, which performs Xcel Energy's shared IT functions. The key types of activities performed by Business Systems include all enterprise application development and maintenance, management of IT infrastructure, data center operations and architecture, and IT governance.

Q. Please describe your educational background.

A. I hold a Bachelor of Arts degree from the University of Minnesota with a major in Political Science and a Juris Doctorate from the Mitchell Hamline School of Law.

Q. Please describe your professional experience.

A. I have over 20 years of experience in the field of IT. I joined Xcel Energy in July 2008, after almost eight years at IBM Global Services where I filled IT roles under contract for Xcel Energy. I began my career at Xcel Energy as a Senior Manager of IT Service Management and served in that position continuously for 11 years. My team was responsible for the administration of core IT service management processes (change, problem, request fulfillment, configuration and asset management). We also ensured compliance and audit readiness for several North American Electric Reliability Corporation ("NERC") regulatory standards and Sarbanes-Oxley Act of 2002 controls. From October 2013 to January 2015, in addition to my role as Senior Manager of IT Service Management, I served on temporary assignment in the General Counsel organization where I practiced law on behalf of Xcel Energy, including transactional work and equal employment opportunity and safety investigations. In July 2019, I was promoted to Director of IT Operations, my current position.

Q. Have you attended or taken any special courses or seminars relating to public utilities?

A. Yes. I have attended several Continuing Legal Education ("CLE") courses on topics related to public utilities and energy generally. Topics include the Public Utility Regulatory Policies Act, federal energy policy, energy and eminent domain,

and regulatory models and regulated utilities. I have also presented CLEs, including *Critical Infrastructure Protection - Cyber Security and the Bulk Electric System*, and presented to the Mid-Continent Compliance Forum on *Tailoring Enterprise Incident Management for CIP Compliance*.

Q. Are you a member of any professional organizations?

A. Yes. I am a member of the Minnesota State Bar Association ("MSBA"), where I serve on the Technology Law Section Council, and am a former chair of the Legal Technology Committee. I am also a member of the MSBA Public Utilities Law Section.

II. ASSIGNMENT AND SUMMARY OF TESTIMONY AND RECOMMENDATIONS

Q. What is your assignment in this proceeding?

A. I review and provide cost data for certain[1] Business Systems-related capital additions that closed to plant-in-service during the period July 1, 2019, which is the first day after the end of the period for which capital additions were approved in Docket No. 49831,[2] through December 31, 2020, which is the end of the Update Period in this case.

I also support the Updated Test Year (January 1, 2020 through December 31, 2020)[3] operation and maintenance ("O&M") expenses and administrative and general expenses for the Business Systems class of affiliate services. In regard to this affiliate class, my testimony will:

- describe the services included in the class;
- explain that those services are reasonable and necessary for SPS's operation;
- explain that the costs for those services are reasonable and necessary;
- explain that these services do not duplicate services that SPS provides to itself through its own employees or that are provided from any other source; and

[1] As I explain later in my testimony, SPS witness James W. Sample supports Business Systems capital additions categorized as Cyber Security. For convenience in my testimony, I refer to the capital additions that I support collectively as "Business Systems capital additions."

[2] *Application of Southwestern Public Service Company for Authority to Change Rates*, Docket No. 49831, Final Order (Aug. 27, 2020).

[3] The Test Year in this case is October 1, 2019 through September 30, 2020, and the Update Period is October 1, 2020 through December 31, 2020. The Updated Test Year consists of the last nine months of the Test Year and the three months in the Update Period. In addition to supporting the Updated Test Year costs, I have also reviewed the costs for the first three months of the Test Year for the classes I support and find those costs to be reasonable.

- explain that charges from XES to SPS for those services are no higher than the charges to SPS affiliates for the same or similar services.

Q. Please summarize your testimony and recommendations.

A. The Business Systems capital additions placed in service between July 1, 2019 and September 30, 2020 total $47,070,240 (total SPS before jurisdictional allocations, or "Total Company"). This investment, which is shown in MOR-RR-2, was reasonable and necessary and prudently incurred. These capital projects consist of software, hardware, systems and related technology infrastructure that support Xcel Energy's business operations, including those of SPS, and are used in supplying electric service to SPS's customers. They are necessary to maintain existing IT systems and infrastructure, to prevent threats to the security of the IT systems, to replace aging technology, and to deploy efficiency solutions that enable the organization to continue to provide customers with high levels of service.

The estimated Business Systems capital additions placed in service between October 1, 2020 and December 31, 2020, as shown on Attachment MOR-RR-3, were also reasonable and necessary to provide and protect the IT infrastructure necessary for the provision of electric service by SPS, and were prudently incurred.

The affiliate charges of $11,715,885 that are included in the July 1, 2019 through September 30, 2020 capital projects, and the estimated affiliate charges shown on Attachment MOR-RR-3 that are included in the October 1, 2020 through December 31, 2020 capital projects, reflect reasonable and necessary costs and services. The charge from SPS's affiliate for a particular service is no higher than the charge by that affiliate to any other entity for the same or similar service.

Finally, the estimated Updated Test Year (January 1, 2020 through December 31, 2020) costs for the services included in the Business Systems affiliate class totaling $37,165,736[4] (Total Company) are reasonable and necessary because they support SPS's ability to provide electric service to its Texas retail customers.

- The costs are for the IT services provided to SPS by XES. The services include the provision and maintenance of computer hardware and software, and voice and data communication networks, used by SPS in providing electric service; the systems that support business functions including billing, accounting, payroll, outage management and dispatch, supply chain, and other general business operations; routine support and improvements for these technologies and systems; preparing for and mitigating cyber security risks; and employing technology and data to advance information analysis and improve business operations.

- The services are necessary to provide the technology infrastructure and systems that enable the provision of efficient, effective, and safe electric service to SPS's customers. Technology is necessary for much of SPS's work including to efficiently dispatch work to the field, operate generating facilities, effectively purchase fuel, manage and monitor the electrical system, bill customers for service, develop budgets and track expenditures, pay employees, and offer programs to customers and respond to their inquiries.

- The costs are reasonable because they are shared with other affiliates, include reasonable personnel costs, and are subjected to rigorous budgeting and cost control processes.

- SPS does not provide these services for itself, and the services do not duplicate services provided by others.

- Each charge from SPS's affiliates for these services is no higher than the charge by those affiliates to any other entity for the same or similar service.

Q. You mention that certain figures that you present in your testimony are estimated. Please explain why this is the case and what items are estimated.

A. As explained by SPS witness William A. Grant, SPS will be using an Updated Test Year in this case. I present the actual dollar amount of Business Systems capital

[4] This dollar amount reflects nine months of actual costs and three months of estimated costs.

additions that closed to plant-in-service through September 30, 2020, the end of the Test Year in this case, and estimated dollar amounts of Business Systems capital additions that SPS expects to close to plant-in-service during the Update Period (July 1, 2019 through December 31, 2020).

Additionally, SPS's initial filing presents actual affiliate expenses for the Test Year (October 1, 2019 through September 30, 2020) and estimated information for the time period of October 1, 2020 through December 31, 2020, which is the Update Period.[5] Accordingly, the first nine months of SPS's Updated Test Year (i.e., January 2020 through September 2020) consist of actual cost information and the last three months (i.e., October through December 2020) contain estimated cost information.

Q. Will your testimony be updated to replace the estimated amounts that you present and support with actual amounts?

A. Yes. SPS will file an update 45 days after the application has been filed. The update will provide actual costs to replace the estimates provided in the application for the Update Period. As part of that process, my Attachment MOR-RR-3 will be updated to remove estimates of Business Systems capital additions closed to plant-in-service in the Update Period and then replace those estimates with actual capital additions closed to plant-in-service during that period.

Additionally, my Attachments MOR-RR-A through D will be updated to remove estimates of Business Systems affiliate expenses incurred by SPS during

[5] As explained by SPS witness Ross L. Baumgarten, actual figures for October and November 2020 have been provided and December 2020 figures have been estimated based on the forecasted budget. However, these expenses have not gone through the full pro forma adjustment review process.

the Updated Test Year and then replace those estimates with actual expenses, which will be used to establish SPS's base rates in this case.

Q. Were Attachments MOR-RR-1 through MOR-RR-D prepared by you or under your direct supervision and control?

A. Yes, I prepared Attachment MOR-RR-1 and the project descriptions on Attachment MOR-RR-3. Attachment MOR-RR-2 and the cost information contained in Attachment MOR-RR-3 were prepared by SPS witness Mark P. Moeller and his staff. My staff and I have reviewed these attachments, and I believe them to be accurate. Attachments MOR-RR-A through MOR-RR-D were prepared by SPS witness Ross L. Baumgarten and his staff. My staff and I have reviewed these attachments, and I believe them to be accurate. Although the information I have described also is present in these other witnesses' attachments, I have presented this information in the attachments to my testimony for convenience.

III. THE RANKING, ESTIMATION, AND MANAGEMENT OF BUSINESS SYSTEMS CAPITAL ADDITIONS

Q. Please generally describe the Business Systems organization and the work Business Systems performs to support SPS's operations.

A. The Business Systems organization within XES performs Xcel Energy's shared IT functions across all Operating Companies[6], including SPS. Attachment MOR-RR-1 to my testimony is an organization chart showing the Business Systems organization. The key types of activities include all enterprise application development and maintenance, management of IT infrastructure, data center operations and architecture, and IT governance—all of which SPS needs to provide safe and reliable electric service to its customers.

Q. What are the key drivers of Business Systems' capital investment?

A. There are three key drivers to IT investments: evolving cyber security threats; replacing aging technology; and evolving business requirements. Business Systems is in a phase of increased investment in IT infrastructure and is making significant capital additions to serve these three objectives. Business Systems has made these investments over the past few years and expects that this phase will continue for the next several years as necessary improvements are made to address cyber security, replace aging technology, and continue to meet evolving business needs.

[6] Northern States Power Company, a Minnesota corporation; Northern States Power Company, a Wisconsin corporation; Public Service Company of Colorado, a Colorado corporation; and SPS.

Q. How does Business Systems determine when an existing application or system needs to be replaced or upgraded?

A. Business Systems works with each of the business areas and Operating Companies to identify short- and long-term technology needs. The needs typically are greater than the organization's ability to fund them, so Business Systems evaluates and prioritizes any proposed Business Systems investment. Business Systems strives to maximize technology investment value by maintaining existing systems until the risk and costs associated with keeping these aging technologies in place outweigh the benefits.

Q. Please describe the process for ranking and funding Business Systems capital projects.[7]

A. Business Systems' budget development, project prioritization, and project management leverages an established IT Governance process. A formal portfolio prioritization process is conducted on a regular basis to determine which capital projects are included in the budget. The project prioritization process is as follows:

1. IT works with each business area to determine its specific IT needs, and then these needs are prioritized based on a particular set of factors. Specifically, each Business Systems area is responsible for partnering with a specific business unit within the organization to determine that area's long-term strategic objectives and identify whether IT investments can enable achievement of those objectives. In turn, these priorities are converted into a proposed Business Systems budget.

   The IT Governance process also monitors the end-to-end project implementation lifecycle for each proposed project, from its conception to

[7] Business Systems' ranking and funding processes include Business Systems projects only. I am supporting a handful of projects that are managed by business areas outside of Business Systems for case efficiency. Those business areas follow all corporate budgeting policies and procedures and may have additional management/governance unique to their respective business areas, which ensure the capital additions are reasonable and necessary.

in service, to help keep the project within budget and on schedule and that it performs as expected for the specified business objective. The IT Governance process also oversees any changes in project scope or budget at the corporate level based on overall Xcel Energy priorities and spending levels.

2. Project ideas are entered into a database and categorized by type. There are four categories: (1) Aging Technology; (2) Enhance Capabilities; (3) Cyber Security; and (4) Advanced Grid Intelligence & Security ("AGIS").

3. From the idea stage, project ideas are evaluated, ranked, and selected based on a common set of filters. This process weighs a multitude of criteria including: (1) the financial and non-financial benefits of a project; (2) the potential for other existing technologies to address the business need; and (3) the degree to which the project is needed to meet regulatory requirements or to ensure system reliability and security. This categorization process allows Business Systems to evaluate the benefits and risks associated with each project idea, and results in a list of ranked project ideas.

4. Once projects are ranked and selected, they are bought to the Xcel Energy Executive Committee to be prioritized and approved.

Q. How do legal requirements affect the ranking and selection of capital projects to be funded?

A. Legal requirements are built into the categories discussed above and also affect the ranking of capital projects. Legal requirements that affect the ranking include environmental requirements, recent system stability, and future regulatory demands. For example, the NERC Critical Infrastructure Protection ("CIP") Standards CIP-002 through CIP-014 require that SPS and Xcel Energy comply with physical and cyber security controls designed to protect critical infrastructure. When there are legal requirements that affect capital projects, their ranking is prioritized in the capital budget.

Q. How does SPS ensure that Business Systems capital additions provide the intended benefits?

A. During the proposal process of each project, key success metrics based on the category of the project are identified. These success metrics are reviewed during project execution and at the close of the project. The sponsor of the project is responsible for measuring and tracking the applicable economic, operational, staffing, regulatory compliance, and any other benefits derived from the project. These formal reviews help the sponsor stay on track for delivery and attain the project benefits.

Q. Please generally describe how Business Systems develops cost estimates for proposed capital additions.

A. When a Business Systems project is in the initial stages of planning, we develop cost and schedule estimates based on internal experience with similar implementations. We then utilize a competitive bid process to ensure that Xcel Energy receives quality service at a fair price, that business value is delivered according to the agreed requirements, and that costs remain in line with the approved budget.

Q. Please explain how Business Systems capital costs are managed during a specific project.

A. After the estimates are developed, all projects follow a project flow process that requires reviews and approvals at the budget, management, senior management, and executive levels. After these approvals, projects are reviewed on a monthly

basis to compare the monthly budget to actual expenditures. Accordingly, on a monthly basis, Business Systems evaluates deviations to determine whether costs are appropriate. In addition, Business Systems develops action plans to mitigate variations in actual to budgeted expenditures. These mitigation plans may either reduce or delay other expenditures to support the overall authorized budget. If authorized budget adjustments are required, they are identified and approved at an appropriate level of management.

IV. BUSINESS SYSTEMS CAPITAL ADDITIONS

Q. As part of this rate case, is SPS asking to include in its rate base Business Systems-related capital additions?

A. Yes. As I discussed above, Business Systems' capital additions fall within the following four categories: (1) Aging Technology; (2) Enhance Capabilities; (3) Cyber Security; and (4) AGIS. Although each project is assigned to one category, its purpose may relate to one or more categories. I address the capital additions categorized as Aging Technology, Enhance Capabilities, and AGIS, while SPS witness James W. Sample addresses the capital additions categorized as Cyber Security.

Business Systems investments are primarily enterprise-wide systems that are used by all of the Operating Companies, including SPS. Attachments MOR-RR-2 and MOR-RR-3 set forth the Aging Technology, Enhance Capabilities, and AGIS Business Systems capital additions that SPS is requesting to include in its rate base. For convenience in my testimony, I refer to these capital additions collectively as Business Systems capital additions. All of these capital additions were prudently incurred as part of the large and growing IT infrastructure necessary to support SPS's ability to provide electric service to its customers. In Subsection IV.A below, I address the capital additions that have closed to plant-in-service during the period July 1, 2019 through September 30, 2020. In Subsection IV.B, I address the capital additions placed in service between the end of the Test Year (September 30, 2020) and December 31, 2020, which as I stated earlier, is the Update Period.

A. Projects Placed in Service between July 1, 2019 and September 30, 2020

Q. As part of this rate case, is SPS asking to include in its rate base Business Systems capital additions closed to plant-in-service during the period of July 1, 2019 through September 30, 2020?

A. Yes. Attachment MOR-RR-2 sets forth the Business Systems capital additions SPS is requesting to include in its rate base. All of these capital additions were prudently incurred and support SPS's ability to provide electric service to its customers.

Q. What is the time period for these Business Systems capital additions?

A. These projects are those Business Systems capital projects that closed to plant-in-service during the 15-month period starting on July 1, 2019 and ending on September 30, 2020. The starting date for this period (July 1, 2019) is the first day after the end of the period for which capital additions were requested in Docket No. 49831, and the ending date for this period (September 30, 2020) is the end of the Test Year in this current case.

Q. What is the dollar amount of the Business Systems capital additions placed in service between July 1, 2019 and September 30, 2020 that SPS is requesting in this docket?

A. The total requested dollar amount of Business Systems capital additions closed to plant-in-service during the period July 1, 2019 through September 30, 2020 is $47,070,240 (Total Company). Attachment MOR-RR-2 provides details regarding the costs of the Business Systems capital additions closed to plant-in-service during this 15-month period. SPS witness Stephanie N. Niemi allocates the Total

Company dollar amount among SPS's jurisdictions (Texas retail; New Mexico retail; and wholesale).

Q. Please briefly describe the Business Systems capital additions placed in service between July 1, 2019 and September 30, 2020.

A. The Business Systems capital additions placed in service between July 1, 2019 and September 30, 2020 consist of software, hardware, systems and related technology infrastructure that are necessary to maintain system stability and adequate performance levels, support changing business needs, or meet regulatory requirements. The major projects are described in more detail later in my testimony.

Q. Please describe the information in Attachment MOR-RR-2, which provides the details about the dollar amounts closed to plant-in-service for these Business Systems capital additions and the associated affiliate component.

A. Attachment MOR-RR-2 provides the following information:

Column A —	WBS Level 4 Number	Provides the Work Breakdown Structure ("WBS") Level 4 number for the project.
Column B —	WBS Level 4 Description	Provides a short title for the WBS Level 4 number for the project.
Column C —	Asset Class	Identifies the type of asset.
Column D —	Witness	Identifies the witness supporting the project.
Column E —	Project Category	Provides the project category for the project.
Column F —	WBS Level 2 Number	Provides the WBS Level 2 number for the project.

Column G —	WBS Level 2 Description	Provides a short title for the WBS Level 2 number for the project.
Column H —	In-Service Date	Provides the date that the project was completed and added to plant-in-service.
Column I —	Additions to Plant in Service (July 2019 – September 2020)	Provides the Total Company dollar amount of the addition to plant-in-service for the project.
Column J —	XES Charges (Included in Column I)	Provides the amount of charges from XES that are included in the Total Company dollar amount of addition to plant-in-service for the project in Column I.
Column K —	Other Affiliate Charges (Included in Column I)	Provides the amount of charges from affiliates other than XES that are included in the Total Company dollar amount of addition to plant-in-service for the project in Column I.
Column L —	Total Affiliate Charges (Included in Column I)	Provides total of Columns J and K associated with new plant-in-service shown in Column I.
Column M —	Total Native Charges (Columns I less L) Within the Total Additions to Plant-in-Service Shown in Column (I)	Provides the dollar amount (Total Company) of the addition to plant-in-service in Column I that is not an affiliate charge.

Q. Attachment MOR-RR-2 includes capitalized affiliate costs. Are those affiliate costs necessary to complete the projects listed in Attachment MOR-RR-2?

A. Yes. Many employees in the Business Systems organization perform work that causes their labor and expenses to be capitalized, rather than expensed. For example, developers, analysts, and project managers who work on IT capital projects to benefit SPS charge their time to specific capital projects, and these costs

are charged back to SPS as part of the capital project cost. In addition, the capital projects include overhead charges that reflect labor and other costs as discussed by Mr. Moeller. When those projects are complete, the costs, including the labor charges, are recorded as new assets.

Q. What portion of the total Business Systems capital costs included in Attachment MOR-RR-2 are affiliate charges?

A. The affiliate charges included in Attachment MOR-RR-2 are $11,715,885, which is approximately 24.89% of SPS's total Business Systems capital additions.

Q. Are the costs of these capitalized affiliate charges reasonable?

A. Yes. In Section V of this testimony, I demonstrate that the Updated Test Year charges by XES employees in the Business Systems organization are reasonable and necessary, and Mr. Baumgarten explains that charges for labor and goods from the Operating Companies to SPS are reasonable and necessary. Those discussions also apply to the $11,715,885 of capitalized affiliate costs that are reflected in Column L of Attachment MOR-RR-2, and that were incurred during the 15-month period, July 1, 2019 through September 30, 2020. Thus, that discussion supports the reasonableness and necessity of these capitalized Business Systems affiliate costs.

Q. What is the difference between the affiliate charges you discussed in Section V of your testimony and the affiliate charges you discuss regarding capital additions?

A. The affiliate charges I discuss later in my testimony are those related to only O&M affiliate expense during the Updated Test Year. In contrast, the affiliate charges that I discuss in this section of my testimony refer to the capitalized affiliate charges

that were closed to plant-in-service during the period from July 1, 2019 through September 30, 2020.

Q. Please describe the Business Systems capital additions closed to plant-in-service during the period July 1, 2019 through September 30, 2020 and listed on Attachment MOR-RR-2 in more detail.

A. All of the Business Systems capital additions listed in Attachment MOR-RR-2 support the technology necessary for SPS to provide the technology infrastructure and systems that enable the provision of efficient, effective, and safe electric service to SPS's customers. The projects listed on Attachment MOR-RR-2 include software implementations and upgrades; hardware upgrades and replacements (computers, servers, radios, phones, routers, and other network equipment); and upgrades and replacements of the overall technology infrastructure required to enable use of the hardware and software (e.g., voice and data networks).

Table MOR-RR-1
Business Systems Capital Additions for the Period
July 1, 2019 through September 30, 2020

Project Category	Capital Additions (Total Company)
Aging Technology	$37,128,507
Enhance Capabilities	$8,863,064
AGIS	$1,078,669
TOTAL	**$47,070,240**

Q. In SPS's last rate case, Business Systems capital additions included a project category referred to as "Productivity Through Technology" or "PTT." Why does that category no longer appear in your testimony?

A. The PTT category related to capital investments made as part of a specific initiative to improve business processes and systems throughout Xcel Energy by addressing

needed technological changes. The PTT initiative focused on replacing Xcel Energy's General Ledger system, as well as several different work and asset management programs across business areas to create an integrated, modernized Work and Asset Management ("WAM") system. The majority of the investments in the PTT initiative were undertaken in 2014 through 2015, with some preliminary work in 2013 and some post-implementation follow-up after 2015. With the completion of the PTT initiative, Business Systems eliminated this category as an option for capital projects in late 2019. Needed updates to or continuous improvement associated with the WAM system are now reflected in other categories, such as "Enhance Capabilities."

Q. Please describe the types of projects included in the "Aging Technology" category.

A. This category of investment contains the capital additions for repairing or replacing aging software, hardware, systems, and related technology infrastructure, which are required to ensure efficient and reliable business operations. The total investment in this category amounts to $37,128,507 during the period. Major projects (i.e., projects in excess of $450,000) included in this category are as follows:

- **WAN SPS - ($10,030,897 Total Company)**. These projects involved wide area network ("WAN") reliability and capacity improvements for distribution and transmission substations, energy supply sites, service centers, and third parties. They address business needs related to increased substation communications reliability; high-speed digital access for operations, maintenance, and security; and the ability to analyze data to improve reliability and operations.

- **SPS Trunked Repeaters (Quantar) - ($9,913,096 Total Company)**. This project involved replacing equipment in SPS's private radio system. This private radio system is critical to SPS operations especially in times of storm restoration when public networks are not available. Replacing the repeaters

eliminates risk to operations, customer satisfaction metrics, regulatory affairs, and financial performance from an extended radio system outage and lack of communications with field personnel and expand capability to support mobile and fixed data applications to enable increased productivity and safe operations.

- **IT INFS Network Refresh - ($6,543,988 Total Company)**. This project involved replacing network components on a regular schedule based on vendor support and end-of-life guidelines to ensure continued network reliability, meet NERC communications requirements, reduce safety concerns, and minimize replacement costs.

- **Next Generation Desktop - ($2,394,721 Total Company)**. This project involved purchasing the licenses necessary to move desktop and mobile computing devices throughout Xcel Energy to the most current operating system, Windows 10, and to move from the Office 2010 suite of applications to Office 365. The legacy operating system was near the end of its useful life, and vendor support ended in January 2020. A current, supported operating system is essential for avoiding security vulnerabilities and enables new business capabilities and efficiencies, such as mobile and tablet technologies across our business.

- **10G Backhaul - ($1,830,011 Total Company)**. Xcel Energy's previous corporate communications backbone had insufficient capacity for the increasing loads introduced by the new WAM system. This project involved upgrading network bandwidth to 10G to address capacity concerns.

- **Planned PC Refresh - ($1,178,005 Total Company).** These projects involved the planned or scheduled replacement of aging personal computers, including laptops and desktops, when they reached the end of their useful lives, and investment necessary to purchase personal comupters for new personnel or as replacements for lost or damaged computers as the need arose.

- **Technology License - ($639,549 Total Company)**. To ensure adequate coverage, Xcel Energy purchased additional licenses to support new and increasing numbers of licenses for common systems, such as Microsoft, VMWare and Oracle, with users usually not tied to specific projects. Updating software licenses ensures that system devices are not over purchased and are running up-to-date licensed software, which decreases support costs and increases the Company's cyber security profile.

- **Vegetation Management Crew Management - ($581,689 Total Company)**. This project involved deployment of a geospatial crew application to receive, track, record, complete, and close out of work set up for contract vegetation management crews. The application increases

NERC compliance, provides effective management of hazardous trees in rights-of-way, increases execution of strategic forecasting, reduces dual data entry, and increases reporting capabilities.

- **Oracle Licenses - ($487,413 Total Company).** This project involved upgrading the Oracle database versions in use across Xcel Energy. Several versions that were in service were at the end of their useful lives and were no longer supported by the vendor. Key systems supported by Oracle include Business Objects, Enterprise Service Bus, the Xcel Energy website, and generation management tools.

- **PCI SPP Settlement Upgrade - ($458,619 Total Company).** The Southwest Power Pool replaced their current market and transmission settlement systems with a single, custom-designed system that required all Southwest Power Pool members, including SPS, to upgrade. This project implemented that necessary system.

Combined, these projects account for 91.73% of the total capital additions in this category. The remaining projects are similar in nature in that they are necessary to repair or replace aging technology, which is essential to ensuring efficient and reliable business operations that support SPS's provision of electric service.

Q. Please describe the types of projects included in the "Enhance Capabilities" category.

A. This category of investment contains the capital additions for implementation of new software, upgrades to existing software systems, and the necessary hardware upgrades to support the software investments. These investments are needed to enhance production and training environments to meet regulatory requirements, efficiently manage assets, improve project management and workflow, enable continued system stability, meet evolving legal compliance requirements, maintain and improve business operations, and to protect SPS and Xcel Energy information. These investments impact many of the operational functions of Xcel Energy

including power plants, transmission operations, facility management, IT operations management, construction project management, and customer care needs. The total investment in this category amounts to $8,863,064 during the period. Major projects (i.e., projects in excess of $300,000) included in this category are as follows:

- **PTT Continuous Improvements - ($2,478,510 Total Company)**. This project builds upon the existing Enterprise Resource Plan system by delivering new functionality and refreshes to specific areas of application. This release included updates for dispatching, scheduling, and materials inventory.
- **ESB Environment Refresh - ($2,192,834 Total Company)**. An Enterprise Service Bus is a middleware which works behind the scenes for communication between application to application. Enterprise Service Buses are designed to provide a uniform means of offering applications the ability to connect to the bus and transfer data based on simple structural and business policy rules. This project refresh enhanced monitoring capabilities, managing quality issues and system issues necessary to reduce data integrity occurrences and promoting a series of processes and controls. The project maximizes online availability, maintains or enhances system processing times, and decreases system risk associated with manual processes.
- **eSOMS Project - ($814,639 Total Company)**. This project upgraded the Electric Shift Operations Management System. This software and associated business processes prevent accidental startup of hazardous equipment while a worker is in direct contact with the isolated equipment. The project is needed for personal safety and to align with industry standards to ensure that dangerous systems are properly shut off and not able to re-start until the work on the isolated equipment is complete, and that all workers involved are individually accounted for.
- **Transmission Asset Health Analytics - ($793,095 Total Company)**. This project involved costs associated with developing a system that provides the analytics for maintaining and replacing transmission assets. The system combines different types of data and explores capabilities to perform data mining, predictive modeling, and advanced analysis.
- **Satellite - ($484,543 Total Company)**. This project involved implementing reliable satellite connections in all Xcel Energy regions and enables dynamic network addressing for satellite connections that have

already been deployed. This upgrade and expansion of satellite capabilities enables automated emergency cut-over and improves performance.

- **Business Systems Resiliency Project - ($400,386 Total Company).** This project built on the Customer Response System and other key domain critical areas across Xcel Energy. It included gaining an understanding of incident root causes and defined improvement opportunities and initial sequencing/roadmap to drive increased stability and resiliency in the future.

- **Network Automation Platform Implementation - ($343,591 Total Company)**. This project provided the Network organization an automation platform that is highly scalable and flexible in terms of integration. The platform increases reliability and stability of network assets and lowers time to implement changes in network and assist in removing human error.

- **Network Inventory and Planning Solution - ($324,551 Total Company)**. This project created a central repository that can house the inventory of all network assets. This inventory will include wireless networks, fiber, physical locations, WAN circuits, network hardware components, etc. In addition, the system provides geospatial visualization of the entire communications network, and provides real-time network monitoring for enhanced network reliability and security.

- **Enterprise Operational Monitoring - ($315,369 Total Company)**. This project supported several corporate initiatives (hardware and software) that enabled additional monitoring of existing and new critical systems for Xcel Energy employees and customers.

Combined, these projects account for 91.93% of the total capital additions in this category. The remaining projects are similar in nature in that they involve the implementation or upgrade of existing software, hardware, or systems that are needed to improve business operations and to protect SPS and Xcel Energy information.

Q. How do you differentiate between the Enhance Capabilities investments and the Aging Technology investments?

A. As noted above, some of the investments overlap between categories. That said, the projects in the Aging Technology category typically involve the replacement of

assets that were already in service, while the projects in the Enhance Capabilities category typically involve implementing systems that significantly add to business capability or efficiency. Close calls in deciding which category is appropriate often involve application upgrades. In some cases, the primary reason for an upgrade is the age of the existing application. In other cases, the upgraded application enables new functionality and capability. In many cases both issues drive the need for the capital investment.

Q. Please describe the types of projects included in the Advanced Grid Intelligence & Security or "AGIS" category.

A. The Advanced Grid Intelligence & Security category captures Xcel Energy's work to build an advanced electric grid that is more resilient and provides more tools and options for customers. In the future, the AGIS category for SPS is expected to also include investment associated with advanced metering infrastructure. That is not, however, part of this case.

The total investment in this category amounts to $1,078,669 during the period and included only one project:

- **Advanced Distribution Management System Data - $1,078,669**. The Advanced Distribution Management System ("ADMS") provides an integrated operating and decision software support system to assist control room, field personnel, and engineers with the monitoring, control, and optimization of the electric distribution system. This ADMS data project involved collecting and reviewing information about the electric distribution assets to ensure that the information available complies with the necessary level of detail needed for ADMS.

This project accounts for 100% of the total capital additions in this category.

Q. In conclusion, are the Business Systems capital additions listed on Attachment MOR-RR-2, that were closed to plant-in-service during the period July 1, 2019 through September 30, 2020, including the capitalized affiliate charges, reasonable and necessary?

A. Yes. The projects listed on Attachment MOR-RR-2 are reasonable and necessary to efficiently manage business operations, protect data and information, meet evolving regulatory and legal requirements, keep current with technology, maintain the stability and reliability of the existing IT systems, and provide the tools required to effectively and safely provide service to SPS's retail customers. The rigorous processes (discussed in Section III) that are followed in evaluating, selecting, and monitoring the execution and implementation of capital projects ensures that the additions are reasonable and necessary and that the costs are prudently incurred to provide safe and reliable utility service to SPS customers.

B. Business Systems Capital Projects Placed in Service Between October 1, 2020 and December 31, 2020

Q. Is SPS asking to recover Business Systems-related capital additions placed in service between the end of the Test Year and December 31, 2020?

A. Yes. SPS seeks to include in rate base capital additions placed in service between the end of the Test Year (September 30, 2020) and December 31, 2020, which as I stated earlier, is the Update Period. Attachment MOR-RR-3 provides SPS's costs for these projects. As initially filed, the costs reflected in Attachment MOR-RR-3 are estimated amounts. Mr. Moeller explains the basis for the budgeted amounts. As discussed by Mr. Grant, SPS will file actual costs for the Update Period,

including an updated version of Attachment MOR-RR-3, no later than the 45th day after the date of the initial filing of this rate case, as required by 16 TAC § 25.246.

Q. What is the dollar amount of Business Systems-related capital additions placed in service between October 1, 2020 and December 31, 2020?

A. The total costs are reflected on Attachment MOR-RR-3, including affiliate costs. These amounts reflect Total Company costs. Ms. Niemi allocates the Total Company dollar amount among SPS's three rate jurisdictions (Texas retail; New Mexico retail; and wholesale) in the cost of service study she presents.

Q. Are capitalized affiliate costs included in the total costs?

A. Yes. The costs include capitalized affiliate costs similar to those included for projects placed in service during the previous 15 months. As initially filed, Attachment MOR-RR-3 contains only a total estimated amount of affiliate charges, which are based on historical percentages for the different asset classes. This is explained in more detail by Mr. Moeller. The updated version of Attachment MOR-RR-3, will reflect actual affiliate charges for the Update Period.

Q. Are those affiliate costs necessary to complete the Business Systems-related capital projects?

A. Yes. Affiliate costs were incurred for the same reasons they were incurred on the projects placed in service between July 1, 2019 and September 30, 2020 as discussed earlier in my testimony.

Q. Are these capitalized affiliate charges reasonable?

A. Yes. These costs satisfy the standards for inclusion of affiliate costs in rates for the reasons presented in my testimony above, as well as the testimony of Mr. Baumgarten and Mr. Moeller regarding the reasonableness of affiliate charges.

Q. Please describe the information in Attachment MOR-RR-3, which provides the dollar amounts for projects placed in service during the Update Period.

A. Attachment MOR-RR-3 provides the following information:

Column A —	Asset Class	Identifies the type of asset.
Column B —	Witness	Identifies the witness supporting the project.
Column C —	Project Category	Identifies the project category.
Column D —	Additions to Plant-in-Service (Oct. 2020 – Dec. 2020)	Identifies the Total Company dollar amount of the addition to plant-in-service.
Column E —	Total Affiliate Charges	Provides the total affiliate charges included in the charges in Column D.
Column F —	Project Description	Provides a description of the project and its major components.

Q. Please describe the projects placed in service during the Update Period.

A. The projects placed in service from October 1, 2020 through December 31, 2020 are similar to the projects that were closed in the previous 15 months and that are discussed in the previous section of my testimony. These projects fall into the same three categories as the projects in the previous 15 months of Aging Technology, Enhance Capabilities, and AGIS. Mr. Sample addresses projects that fall into the Cyber Security category.

All of the projects placed in service from October 1, 2020 through December 31, 2020 support the technology necessary for SPS to provide the technology infrastructure and systems that enable the provision of efficient,

effective, and safe electric service to SPS's customers. Descriptions of the specific projects placed in service between October 1, 2020 and December 31, 2020, and the reasons the specific projects are necessary, are provided on my Attachment MOR-RR-3.

Q. Has SPS managed its Update Period Business Systems related capital addition projects to ensure the final, actual costs are reasonable and prudent?

A. Yes. The same budgeting and project management process that I describe in Section III of my testimony applies to the projects for the Update Period.

V. AFFILIATE EXPENSES FOR THE BUSINESS SYSTEMS CLASS OF SERVICES

Q. Earlier in your testimony, you referred to an "affiliate class." What do you mean by the terms "affiliate class" or "affiliate class of services"?

A. A portion of SPS's costs reflects charges for services provided by a supplying affiliate, specifically XES or one of the Operating Companies. These charges have been grouped into various affiliate classes, or aggregations of charges, based upon the business area, organization, or department that provided the service or, in a few instances, the accounts that captured certain costs. In his direct testimony, Mr. Baumgarten provides a detailed explanation of how the affiliate classes were developed and are organized for this case.

Q. Which affiliate class do you sponsor?

A. I sponsor the Business Systems class of affiliate services.

A. Overview of Business Systems Class of Services and Related Affiliate Costs

Q. Where does the Business Systems affiliate class fit into the overall affiliate structure?

A. Attachment RLB-RR-6 to Mr. Baumgarten's direct testimony provides a list and a pictorial display of all affiliate classes, dollar amounts for those classes, and sponsoring witness for each class. As seen on that attachment, the Business Systems affiliate class was part of the Utilities & Corporate Services business area during the Updated Test Year.

Q. What services are grouped into the Business Systems affiliate class?

A. The costs of Xcel Energy's centralized IT services are grouped in the Business Systems class. These services include the provision and maintenance of computer

hardware and software, voice and data communication networks, and related technology support for SPS and the other Operating Companies; provision of IT systems that support business functions including billing, accounting, payroll, outage management and dispatch, supply chain, and other general business operations; provision of routine support and improvements for these technologies and systems; preparation for and mitigation of cyber security risks; and employment of technology and data to advance information analysis and improve business operations.

Q. What is the dollar amount of the Updated Test Year XES charges that SPS requests, on a Total Company basis, for the Business Systems affiliate class?

A. The following table (next page) summarizes the dollar amount of the estimated Updated Test Year XES charges for the Business Systems affiliate class. I will update the table below as part of SPS's 45-day case update filing to reflect the Updated Test Year costs for the Business Systems affiliate class.

Table MOR-RR-2[8]

		Requested Amount of XES Class Expenses Billed to SPS (Total Company)		
Class of Services	Total XES Class Expenses	Requested Amount	% Direct Billed	% Allocated
Business Systems	$321,545,612	$37,165,736	15.37%	84.63%

[8] **Total XES Class Expenses** is the Dollar amount of total Updated Test Year expenses that XES charged to all Xcel Energy companies for the services provided by this affiliate class. This is the amount from Column E in Attachment MOR-RR-A. **Requested Amount** is SPS's requested amount after exclusions and pro forma adjustments. **% Direct Billed** is the percentage of SPS's requested XES expenses for the class that were billed 100% to SPS. **% Allocated** is the percentage of SPS's requested XES expenses for the class that were allocated to SPS.

Q. Please describe the attachments that support the information provided on Table MOR-RR-2.

A. There are four attachments to my testimony that present information about the requested SPS affiliate expenses for the Business Systems affiliate class.

Attachment MOR-RR-A: Provides a summary of the affiliate expenses for this class during the Updated Test Year. The summary starts with the total of the XES expenses to SPS for the services provided by this affiliate class and ends with the requested dollar amount of XES expenses to SPS (Total Company) for this affiliate class after exclusions and pro forma adjustments. The columns on this attachment provide the following information.

Column A —	Line No.	Lists the Attachment line numbers.
Column B —	Affiliate Class	Lists the affiliate class.
Column C —	Billing Method (Cost Center)	Shows the billing method that XES uses to charge the expenses to the affiliates, and the billing method short title. In his direct testimony, Mr. Baumgarten explains the billing methods and defines the codes.
Column D —	Allocation Method	Shows the allocation method applicable to the billing method (cost center).
Column E —	Total XES Billings for Class to all Legal Entities (FERC Acct. 400-935)	Shows XES billings to all legal entities for the affiliate class.
Column F —	XES Billings for Class to all Legal Entities Except for SPS (FERC Acct. 400-935)	Shows XES billings to all legal entities except SPS for the affiliate class.

Column G —	XES Billings for Class to SPS (Total Company) (FERC Acct. 400-935)	Shows XES billings to SPS (Total Company) for the affiliate class.
Column H —	Exclusions	Shows the total dollars to be excluded from Column G. Exclusions reflect expenses not requested, such as expenses not allowed or other expenses excluded from the cost of service.
Column I —	Per Book	Shows XES billings to SPS (Total Company), for the affiliate class, after the exclusions shown in Column H. The dollar amount in Column I is Column G plus Column H.
Column J —	Pro Formas	Shows the total dollar amount of pro forma adjustments to the dollar amount in Column I. Pro forma adjustments reflect revisions for known and measurable changes to the Updated Test Year expenses.
Column K —	Requested Amount (Total Company)	Shows the requested amount (Total Company) for the affiliate class. The dollar amount in Column K is Column I plus Column J.
Column L —	% of Class Charges	Shows the percentage of affiliate class charges billed using the cost center.

In his direct testimony, Mr. Baumgarten provides a consolidated summary of affiliate expenses for all classes during the Test Year and Updated Test Year.

Attachment MOR-RR-B(CD): Provides the detail of the XES expenses for the Business Systems affiliate class that are summarized on Attachment MOR-RR-A. The detail shows the XES expenses billed to SPS for the Business Systems affiliate class, itemized by the amount, with each expense listed by individual activity and billing method (cost center). When summed, these amounts

tie to the amounts shown on Attachment MOR-RR-A, and the detail regarding the expenses is organized to support that attachment. Specifically, the columns on this attachment provide the following information.

Column A —	Line No.	Lists the Attachment line numbers.
Column B —	Legal Entity Receiving XES Expenses	Shows the legal entity (Xcel Energy or one of its subsidiaries) that received the XES expense.
Column C —	Affiliate Class	Lists the affiliate class.
Column D —	Cost Element	Provides the cost element number.
Column E —	Activity	Provides a short title for the activity.
Column F —	Billing Method (Cost Center)	Identifies the billing method and short title. In his direct testimony, Mr. Baumgarten explains the billing methods and defines the codes.
Column G —	FERC Account	Shows the Federal Energy Regulatory Commission ("FERC") Account in which the expense was recorded for the operating companies.
Column H —	XES Billings for Class to all Legal Entities (FERC Acct. 400-935)	Shows the itemized amount of the listed XES expense that was billed to all legal entities for the affiliate class.
Column I —	XES Billings for Class to all Legal Entities Except SPS (FERC Acct. 400-935)	Shows the itemized amount of the listed XES expense that was billed to all legal entities except SPS for the affiliate class.
Column J —	XES Billings for Class to SPS (Total Company) (FERC Acct. 400-935)	Shows the itemized amount of the listed XES expense that was billed to SPS for the affiliate class. Therefore, the sum of this column provides total billings to SPS and ties to the total dollar amount for the affiliate class in Column G of Attachment MOR-RR-A.

Column K —	Exclusions	Shows the total dollars excluded from Column J. The total dollar amount for the affiliate class in Column K ties to the total dollar amount for the affiliate class in Column H of Attachment MOR-RR-A.
Column L —	Per Book	Shows XES billings to SPS (Total Company) for the affiliate class after the exclusions shown in Column K. The dollar amount in Column L is Column J plus Column K. The total dollar amount for the affiliate class in Column L ties to the total dollar amount for the affiliate class in Column I of Attachment MOR-RR-A.
Column M —	Pro Formas	Shows the dollar amount of pro forma adjustments to the dollar amount in Column L. The total dollar amount for the affiliate class in Column M ties to the total dollar amount for the affiliate class in Column J of Attachment MOR-RR-A.
Column N —	Requested Amount (Total Company)	Shows the requested amount (Total Company) for the affiliate class. The dollar amount in Column N is Column L plus Column M. The total dollar amount for the affiliate class in Column N ties to the total dollar amount for the affiliate class in Column K of Attachment MOR-RR-A.

Mr. Baumgarten also provides a consolidated summary of this information for all affiliate classes during the Test Year and the Updated Test Year.

Attachment MOR-RR-C: Both Attachments MOR-RR-A and MOR-RR-B(CD) show exclusions to the XES expenses billed to SPS for the Business Systems affiliate class (Attachment MOR-RR-A, Column H; Attachment MOR-RR-B(CD), Column K). Attachment MOR-RR-C provides detail about

1 those exclusions listed on Attachments MOR-RR-A and MOR-RR-B(CD). The
2 columns on Attachment MOR-RR-C provide the following information.

Column A —	Line No.	Lists the Attachment line numbers.
Column B —	Affiliate Class	Lists the affiliate class.
Column C —	FERC Account	Identifies the FERC Account and FERC Account description for the expense that has been excluded.
Column D —	Explanations for Exclusions	Provides a brief rationale for the exclusion.
Column E —	Exclusions (Total Company)	Shows the dollar amount of the exclusion.

3 In his direct testimony, Mr. Baumgarten describes the calculations
4 underlying the exclusions.

5 **Attachment MOR-RR-D:** Both Attachments MOR-RR-A and
6 MOR-RR-B(CD) show pro forma adjustments to SPS's per book expenses for the
7 Business Systems affiliate class (Attachment MOR-RR-A, Column J; Attachment
8 MOR-RR-B(CD), Column M). Attachment MOR-RR-D provides information
9 about those pro forma adjustments shown on Attachments MOR-RR-A and
10 MOR-RR-B(CD). The columns on Attachment MOR-RR-D provide the following
11 information.

Column A —	Line No.	Lists the Attachment line numbers
Column B —	Affiliate Class	Lists the affiliate class.
Column C —	FERC Account	Identifies the FERC Account and FERC Account description affected by the pro forma adjustment.
Column D —	Explanations for Pro Formas	Provides a brief rationale for the pro forma adjustment.

Column E —	Sponsor	Identifies the witness or witnesses who sponsor the pro forma adjustment.
Column F —	Pro Formas (Total Company)	Shows the dollar amount of the pro forma adjustment.

Q. Does XES bill its expenses for the Business Systems affiliate class to SPS in the same manner as it bills other affiliates for those expenses?

A. Yes. As discussed by Mr. Baumgarten, XES uses the same method for billing and allocating costs to affiliates other than SPS that it uses to bill and allocate those costs to SPS.

Q. Are there any exclusions to the XES billings to SPS for the Business Systems affiliate class?

A. Yes. As I mentioned earlier, exclusions reflect expenses SPS is not requesting to recover, such as expenses that are not related to the provision of utility service or other below-the-line items. Exclusions are shown on Attachment MOR-RR-A, Column H, and on Attachment MOR-RR-B(CD), Column K. The details for the exclusions are provided in Attachment MOR-RR-C. Mr. Baumgarten describes how the exclusions were calculated. In SPS's 45-day case update, I will present an updated Attachment MOR-RR-C that will provide actual exclusions to replace any estimated exclusions included in my original attachment.

Q. Are there any pro forma adjustments to SPS's per book expenses for the Business Systems affiliate class?

A. Yes. As I mentioned earlier, pro forma adjustments are revisions to Updated Test Year expenses for known and measurable changes. Pro forma adjustments are shown on Attachment MOR-RR-A, Column J, and on Attachment

MOR-RR-B(CD), Column M. The details for the pro forma adjustments, including the witness or witnesses who sponsor each pro forma adjustment, are provided in Attachment MOR-RR-D. As shown on that attachment, I am not a sponsor for the pro forma adjustments for the Business Systems affiliate class. Given the time of SPS's initial filing, only the first nine months of the Updated Test Year have been subjected to a complete pro forma adjustment review process. In SPS's 45-day case update, I will present an updated Attachment MOR-RR-D that will complete the full pro forma adjustment review process for the last three months of the Updated Test Year.

B. The Business Systems Class of Services are Necessary Services

Q. Are the services that are grouped in the Business Systems affiliate class necessary for SPS's operations?

A. Yes. Business Systems provides a vital service that enables the provision of efficient, effective, and safe electric service to SPS's customers. Dependence on technology is continuing to increase. Technology is necessary for much of SPS's work, including to efficiently dispatch work to the field, operate generating facilities, effectively purchase fuel, manage and monitor the electrical system, bill customers for service, develop budgets and track expenditures, pay employees, and offer programs to customers and respond to their inquiries. The services grouped in the Business Systems affiliate class are necessary to ensure that SPS has the technology infrastructure and systems needed to perform these tasks. They are functions required by all utilities and without which SPS would not be able to provide electric service to its customers.

Q. What are the specific services that are provided to SPS by the Business Systems affiliate class?

A. Business Systems provides and maintains the technology infrastructure utilized by SPS and all of Xcel Energy, including hardware, voice and data networks, databases, and the middleware that facilitates integration and communication between systems. The responsibilities of Business Systems include SPS's desktop computers, printers, and software, as well as distributed systems such as servers, computer systems, communications systems, telephones, and electronic communication networks. Business Systems also has responsibility for software application development, data storage, and for updating or replacing systems and applications as they age. Finally, Business Systems is responsible for implementation of capital projects discussed in Section IV of my testimony. The major software applications that Business Systems supports are:

- Customer Resource System ("CRS") - stores SPS customer data and generates customer bills; used by call center agents as they respond to SPS customer inquiries about outages and billing;
- Outage Management System and dispatch system - used to track customer outages and dispatch repair crews in the SPS service territory;
- Meter Reading Management systems - used to manage the inventory of meters and devices used to collect usage information from SPS customers;
- Supervisory Control and Data Acquisition ("SCADA") system - used to monitor system operations and the health of the SPS transmission grid;
- Work Management Systems - used for purchasing and management of materials and inventory used in the generation, transmission, and distribution business areas; enables maintenance of the infrastructure in the SPS plants and in the SPS transmission and distribution network; and

- Financial systems - enables creation, tracking, reporting, and analysis of budgets, forecasts, and actual financial results.

Q. Are any services in the Business Systems affiliate class that are provided to SPS duplicated elsewhere in XES or in any other Xcel Energy subsidiary such as SPS itself?

A. No. Within XES, none of the services grouped in the Business Systems affiliate class are duplicated elsewhere. No other Xcel Energy subsidiary performs these services for the Operating Companies. In addition, SPS does not perform these services for itself.

Q. Do SPS's Texas retail customers benefit from the services that are part of the Business Systems class of services?

A. Yes. The services of the Business Systems class benefit SPS's customers in many ways. For example, the computers and computer systems are used to store and retrieve data to bill customers; the communications systems are used to manage the grid and the interactions between generation, transmission, and distribution; the telephones and electronic communication networks are used to communicate internally and with customers; and the software implemented protects from cyber security attacks and allows for continued operation of all these systems. Customers benefit through the use of these systems to track customer usage, monitor status of the electric grid, address and manage service issues and interruptions, generate customer bills, and support customer inquiries.

C. The Business Systems Class of Services are Provided at a Reasonable Cost

1. Additional Evidence

Q. Is there additional support for a portion of the expenses that you present in this testimony?

A. Yes. Of the estimated Updated Test Year costs for the Business Systems class, 18.65% are compensation and benefits costs for XES personnel. SPS witnesses Michael P. Deselich and Richard R. Schrubbe establish that the level of Xcel Energy's compensation and benefits is reasonable and necessary. In addition, half of the requested costs for this class were for goods or services procured by contract. Xcel Energy's Supply Chain organization is responsible for the sourcing and purchasing of goods and services needed by SPS, as well as the review and processing of payments by vendors. SPS witness Robert H. Kunze provides testimony about these functions and demonstrates that the Supply Chain processes and controls produce reasonable costs supporting SPS's operations.

2. Budget Planning

Q. Is a budget planning process applicable to the Business Systems class of affiliate costs?

A. Yes. Annual budgets are created, which are applicable to the Business Systems class of affiliate costs, using guidelines developed at the corporate level. Each manager within the Utilities & Corporate Services business area, which includes the Business Systems organization, carefully reviews historical spend information, identifies changes that will be coming in the future, and analyzes the costs

associated with those changes prior to submitting a proposed budget. The budgeting process is discussed in more detail by SPS witness Adam R. Dietenberger.

Q. During the fiscal year, does the Business Systems organization monitor its actual expenditures versus its budget?

A. Yes. Actual versus expected expenditures are monitored on a monthly basis by management in the Business Systems organization. Deviations are evaluated each month to ensure that costs are appropriate. In addition, action plans are developed to mitigate variations between actual and budgeted expenditures. These mitigation plans may either reduce or delay other expenditures so that overall spending complies with the authorized budget. If authorized budget adjustments are required, they are identified and approved at an appropriate level of management.

Q. Are employees within the Business Systems organization held accountable for deviations from the budget?

A. Yes. All management employees in the Utilities & Corporate Services business area have specific budgetary goals that are incorporated into their performance evaluations. Performance is measured on a monthly basis to ensure adherence to the goals and provide for action plan development to address variances. All Business Systems managers are required to manage their expenses to support the budgetary goals. Failure to meet these performance targets will affect their performance evaluation and overall compensation.

3. Cost Trends

Q. Please state the dollar amounts of the actual per book charges from XES to SPS for the Business Systems class of services for the three fiscal years preceding the end of the Updated Test Year and the estimated per book charges for the estimated Updated Test Year.

A. The following table shows, for the fiscal years 2017, 2018, and 2019 (calendar years), the actual per book, and, for the Updated Test Year, the estimated per book affiliate charges (Column I on Attachment MOR-RR-A) from XES to SPS for the services grouped in the Business Systems affiliate class:

Table MOR-RR-3

	(Per Book) Charges Over Time			
Class of Services	2017	2018	2019	Updated Test Year (Estimated)
Business Systems	$30,356,095	$34,027,463	$34,852,985	$37,010,888

Q. What are the reasons for this trend?

A. Using Per Book charges for 2017 as a baseline, the increase in costs between 2017 and the Updated Test Year of $6.7 million was primarily due to three major drivers. First, costs for network equipment for shared assets increased by $3.3 million. SPS shared asset costs (recorded in FERC Account 931) increased due to an increase in total Xcel Energy network equipment capital additions. However, a large SPS native credit (recorded in FERC Account 922) offset the shared costs resulting in an overall decrease. Shared asset costs occur when employees in two or more of the Xcel Energy legal entities use or share an asset owned by one of the

Xcel Energy legal entities, which is the case with certain assets supported by Business Systems. The transactions result in the sharing of the costs for that asset, including depreciation. Ms. Schmidt and Mr. Moeller address the type of shared asset costs requested in this case. Second, Business Systems labor expenses increased by $1.6 million. This was primarily from insourcing IT operations that were previously provided by outside contractors. The increase in labor expense was partially offset by a decrease in outside labor expenses of $.8 million. Third, Business Systems experienced an increase in software maintenance costs of $2.1 million. The software maintenance increase is partially from the modernized WAM system discussed earlier, as well as keeping software maintenance current to continue to receive security patches and other necessary updates.

4. Staffing Trends

Q. Please provide the staffing levels for the Business Systems class of services for the three fiscal years preceding the end of the Updated Test Year and the Updated Test Year.

A. The following table shows, for the fiscal years 2017, 2018, and 2019 (calendar years) and for the Updated Test Year, the average of the end of month staffing levels for the Business Systems class of services.

Table MOR-RR-4

	Average of End of Month # of Staff			
Class of Services	2017	2018	2019	Updated Test Year (Estimated)
Business Systems	290	358	463	563

Q. What are the reasons for this trend?

A. The increase in average staffing levels from 2017 to 2019 was due to an initiative by Business Systems to insource IT operations that were previously provided by outside contractors. There are several reasons for this initiative. Some of the outside personnel had high rates of turnover, resulting in a loss of expertise specific to Xcel Energy. Insourcing improves the retention of institutional knowledge. In many cases, the Xcel Energy insourced personnel have supported Xcel Energy for long periods of time on a contract basis. Insourcing also provides Xcel Energy with the added ability to manage processes internally and not depend on outside vendors. Finally, outside contractors with access to critical systems and data who were located offshore were replaced with new employees who would be directly employed by and located within Xcel Energy, enhancing security and helping maintain compliance with NERC CIP requirements. The increase in average staffing levels between 2019 and the Updated Test Year is attributed to a continuation of Business System's ongoing insourcing initiative. More specifically, a majority of the increase between 2019 and the Updated Test Year relates insourcing personnel for the Xcel Energy enterprise network. This allows Xcel Energy to design and maintain the enterprise network in a way that strategically enhances and supports the business operations areas and allows Xcel Energy to manage future growth and costs. A smaller portion of the staffing increase between 2019 and the Updated Test Year related to an initiative to address communication channels. Xcel Energy recognizes that customers' expectations have changed with regard to how they communicate with the company.

5. Cost Control and Process Improvement Initiatives

Q. Separate from the budget planning process, does the Business Systems affiliate class take any steps to control its costs or to improve its services?

A. Yes. As part of ongoing operations, service delivery model options and improvement opportunities are implemented as appropriate. These may include increasing or decreasing the scope of outsourced services; increasing or decreasing the use of consultants based on opportunities to create value or address new risk exposures; changing service delivery providers based on quality, stability or price; and shifting resources to the most critical needs as business priorities and risks change. Business Systems also utilizes competitive bidding practices and a multi-vendor sourcing strategy where possible, which encourages vendors to compete against each other for Xcel Energy's business, and thus have an incentive to keep the price of their services competitive. Also, having multiple vendors available minimizes the risks associated with relying solely on one vendor.

Q. Are there specific strategies utilized for assessing service performance?

A. Yes. In addition to identifying service needs and assessing delivery options as described above, service level and business value metrics are monitored to understand performance and identify improvement opportunities. Examples of the metrics that are monitored are daily bill performance (the number of meter reads processed and bills distributed); call handling times in the customer and IT help desk environments; up-time for critical systems such as the Energy Management System ("EMS"), SCADA, and trading desk environments; and time to recover for all unexpected technology outages. In addition, a number of IT services and

systems are tracked for their up-time, real-time performance, and critical error recovery.

D. The Costs for the Business Systems Class of Services are Priced in a Fair Manner

Q. For those costs that XES charges (either directly or through use of an allocation) to SPS for the Business Systems class of services, does SPS pay any more for the same or similar service than does any other Xcel Energy affiliate?

A. No. The XES charges to SPS for any particular service are no higher than the XES charges to any other Xcel Energy affiliate. The costs charged for particular services are the actual costs that XES incurred in providing those services to SPS. A single, specific allocation method, rationally related to the cost drivers associated with the service being provided, is used with each cost center (billing method). In his direct testimony, Mr. Baumgarten discusses the selection of billing methods and XES's method of charging for services in more detail.

Q. How are the costs of the Business Systems affiliate class billed to SPS?

A. My Attachment MOR-RR-B(CD) shows all of the costs in this class broken out by activity and, in conjunction with Column C in my Attachment MOR-RR-A, shows the billing method associated with each activity. My Attachment MOR-RR-A shows the allocation method (Column D) associated with each billing method (Column C) used in the affiliate class.

In SPS's 45-day case update, I will present updated Attachments MOR-RR-A and MOR-RR-B(CD) so that the entries for the last three months of the Updated Test Year provide actual data and conform to the information provided

for the first nine months. In the event the predominant allocation methods for the Business Systems affiliate O&M expenses on my updated Attachments MOR-RR-A and MOR-RR-B(CD) differ from those discussed below, I will explain those differences in supplemental testimony in SPS's 45-day case update filing.

Q. What are the predominant billing allocation methods used for billing costs that SPS seeks to recover for the Business Systems affiliate class of services?

A. Approximately 96.71% of the requested XES charges to SPS for this class were charged using one of the following ten billing allocation methods:

- Number of Computers: 26.49% of XES charges to SPS - $9,846,971;
- Average of a Select Set of Software Allocators: 32.44% of XES charges to SPS - $12,057,907;
- Direct Billing: 15.37% of XES charges to SPS - $5,711,501;
- Average of all Software Percentages: 8.98% of XES charges to SPS - $3,339,184;
- Number of Phones, Radios, and Computers: 4.53% of XES charges to SPS - $1,684,185;
- Assets, Revenue, Number of Employees: 3.19% of XES charges to SPS - $1,184,796;
- Electric Transmission Plant: 1.04% of XES charges to SPS - $387,431;
- Electric Production Plant/Electric Transmission Plant/Electric Distribution Plant: 1.85% of XES charges to SPS - $688,052;
- Number of Meters/Number of Residential Contacts handled by the Call Centers: 1.39% of XES charges to SPS - $517,147; and
- Number of Employees: 1.43% of XES charges to SPS - $530,898.

Q. Why is it appropriate to allocate costs based upon the "Number of Computers" method for the costs captured in the cost centers that use that allocation method?

A. For the cost centers charged using the "Number of Computers" method as the allocator, the costs are driven by the machines in the environment. For example, the costs of the IT help desk service, collected in Cost Center 200148, are assigned using this allocation method, and these costs are driven by the number of computers in use. Thus, allocating these costs based on the number of computers is appropriate for the allocation of costs to affiliates because it allocates costs for the services in accordance with cost causation and the distribution of the benefits of the services received. For the cost centers that assign costs based upon this allocation method, the per unit amounts charged by XES to SPS as a result of the application of this allocation method are no higher than the unit amounts billed by XES to other affiliates for the same or similar services and represent the actual costs of the services.

Q. Why is it appropriate to allocate costs based upon the "Average of Select Set of Software Allocators" for the costs captured in the cost centers that use that allocation method?

A. For the cost centers charged using the "Average of Select Set of Software Allocators" method as the allocator, the costs are those of the resources (including team members, servers, and databases) for managing the information systems infrastructure and providing other consolidated services to support the selected software applications throughout the entire IT environment. For example, the

server costs supporting the selected software applications are collected in Cost Center 200111 EAI (Enterprise Application Integration) and are assigned using the "Average of Select Set of Software Allocators" method as the allocator. The cost driver for these support activities is the selected software applications. This allocator averages the percentages applied under the diverse allocations used for the supported applications and applies the resulting percentage to allocate these costs. This allocation reflects cost causation and the distribution of the benefits of the services received. For the cost centers that assign costs based upon this allocation method, the per unit amounts charged by XES to SPS as a result of the application of this allocation method are no higher than the unit amounts billed by XES to other affiliates for the same or similar services and represent the actual costs of the services.

Q. Why is the "Direct Billing" method appropriate for assigning the costs captured in the cost centers that use that allocation method?

A. For the cost centers that are assigned using the "Direct Billing" method, the costs normally reflect work that was performed specifically for SPS only. In some cases, however, the direct billing occurred after the application of an off-line allocator that tracks the relevant cost drivers. In either situation, the cost centers charged using the "Direct Billing" method are appropriate because the assignment of costs is in accordance with the distribution of benefits for the services received. For example, the costs to lease point-to-point SPS network circuits are assigned using the "Direct Billing" method. The cost of these services benefitted SPS, the work was performed specifically for SPS alone, and the cost driver is SPS's communication

requirements. Thus, the "Direct Billing" method is appropriate because it assigns costs in accordance with cost causation and benefits received. For the cost centers that assign costs using Direct Billing, the per unit amounts charged by XES to SPS are no higher than the unit amounts billed by XES to other affiliates for the same or similar services and represent the actual costs of the services.

Q. Why is it appropriate to allocate costs based upon the "Average of all Software Percentages" (allocators for critical applications) for the costs captured in the cost center that uses that allocation method?

A. For Cost Center 200115, which uses the "Average of All Software Percentages" method as the allocator, the costs are those of the resources (including team members, servers, and databases) for managing the information systems infrastructure and providing other consolidated services to support operationally critical software applications throughout the entire IT environment. The cost driver for these support activities is the software applications. This allocator averages the percentages applied under the diverse billing allocations used for the supported applications and applies the resulting percentage to allocate these costs. This allocation reflects cost causation and the distribution of the benefits of the services received. For the cost center that assigns costs based upon this allocation method, the per unit amounts charged by XES to SPS as a result of the application of this allocation method are no higher than the unit amounts billed by XES to other affiliates for the same or similar services and represent the actual costs of the services.

Q. Why is it appropriate to allocate costs based upon the "Number of Phones, Radios, and Computers" method for the costs captured in the cost center that uses that allocation method?

A. For Cost Center 200172, which uses the "Number of Phones, Radios, and Computers" method as the allocator, the costs are those related to Xcel Energy's internal and external IT Network. The network supports the phones, radios, and computers across all of Xcel Energy and the cost driver for these costs is therefore the number of these machines. Thus, this cost center allocates costs among the Xcel Energy legal entities based upon the proportionate share of phones, radios, and computers within each Xcel Energy legal entity (i.e., the number of machines in a particular legal entity as a percentage of the total number of machines of all of the legal entities). This allocation reflects cost causation and the distribution of the benefits of the services received. For the cost center that assigns costs based upon this allocation method, the per unit amounts charged by XES to SPS as a result of the application of this allocation method are no higher than the unit amounts billed by XES to other affiliates for the same or similar services and represent the actual costs of the services.

Q. Why is it appropriate to allocate costs based upon the "Asset, Revenue, Number of Employees" method for the costs captured in the cost centers that use that allocation method?

A. The "Asset, Revenue, and Number of Employees" allocation method produces an allocation of costs that recognizes the complexity, risk, and overall business activity levels that drives the costs included in the cost centers and measures the benefits

received from those activities. For the cost centers billed using this allocator, there is no one specific cost driver for the support tasks and services provided, and the services benefit multiple Xcel Energy affiliates. For example, the software maintenance costs associated with systems used by all Operating Companies are collected in Cost Center 200074, which uses this allocation method. Within the Xcel Energy holding company group, those legal entities that have proportionately more assets, revenues, and employees will have more focus placed on their operations due to those subsidiaries' relative influence on the consolidated business balance sheet, income statement and statement of cash flow, and the subsidiaries will benefit accordingly from the services provided. Thus, allocating these costs based upon the average of the total asset ratio, revenue ratio, and the employee ratio is appropriate because it allocates costs in accordance with cost causation and benefits received. Mr. Baumgarten discusses this allocation method in more detail in his testimony. For the cost centers that assign costs based upon this allocation method, the per unit amounts charged by XES to SPS as a result of the application of this allocation method are no higher than the unit amounts billed by XES to other affiliates for the same or similar services and represent the actual costs of the services.

Q. Why is it appropriate to allocate costs based upon the "Electric Transmission Plant" method for the costs captured in the cost centers that use that allocation method?

A. For the cost centers that use "Electric Transmission Plant" as an allocator, the costs are driven by the transmission plant of the Operating Companies. For example, Cost Center 200124, which uses the "Electric Transmission Plant" method as the

allocator, captures the costs associated with application development and maintenance of the EMS and SCADA systems that support the electric transmission plant of the Operating Companies. Thus, this cost center allocates costs among the Xcel Energy Operating Companies based upon the proportionate share of gross transmission plant of each Operating Company (i.e., the gross plant of a particular Operating Company as a percentage of the total plant for all of the Operating Companies). This allocation reflects cost causation and the distribution of the benefits of the services received. For the cost centers that assign costs based upon this allocation method, the per unit amounts charged by XES to SPS as a result of the application of this allocation method are no higher than the unit amounts billed by XES to other affiliates for the same or similar services and represent the actual costs of the services.

Q. Why is it appropriate to allocate costs based upon the "Electric Production Plant/Electric Transmission Plant/Electric Distribution Plant" method for the costs captured in the cost centers that use that allocation method?

A. For the cost centers that use "Electric Production Plant/Electric Transmission Plant/Electric Distribution Plant" as an allocator, the costs are driven by the transmission, distribution, and production plant of the Operating Companies. For example, Cost Center 200180, which uses the "Electric Production Plant/Electric Transmission Plant/Electric Distribution Plant" method as the allocator, captures the costs associated with application development and maintenance of information operations that impact the electric transmission, distribution, and production plant of the Operating Companies. In addition, certain costs associated with the

maintenance of the EMS are allocated using this method. Thus, this cost center allocates costs among the Xcel Energy Operating Companies based upon the proportionate share of gross transmission, distribution, and production plant of each Operating Company (i.e., the gross plant of a particular Operating Company as a percentage of the total plant for all of the Operating Companies). This allocation reflects cost causation and the distribution of the benefits of the services received. For the cost centers that assign costs based upon this allocation method, the per unit amounts charged by XES to SPS as a result of the application of this allocation method are no higher than the unit amounts billed by XES to other affiliates for the same or similar services and represent the actual costs of the services.

Q. Why is it appropriate to allocate costs based upon the "Number of Meters/Number of Residential Contacts Handled by the Call Centers" method for the costs captured in the cost center that uses that allocation method?

A. For Cost Center 200171, which uses the "Number of Meters/Number of Residential Contacts Handled by the Call Centers" method as the allocator, the costs are for the CRS system, which is Xcel Energy's customer service and billing system. The cost drivers for the CRS system are the number of meters for which usage is stored and bills are issued, and the number of customer service calls handled by the call centers. Thus, this cost center allocates costs among the Operating Companies based upon the average of the proportionate share of meters (i.e., the number of meters within a particular Operating Company as a percentage of the total number of meters for all of the Operating Companies) and the proportionate share of call center calls (i.e., the number of calls originating from within a particular Operating

Company as a percentage of the total number of calls for all of the Operating Companies). This allocation reflects cost causation and the distribution of the benefits of the services received. For the cost center that assigns costs based upon this allocation method, the per unit amounts charged by XES to SPS as a result of the application of this allocation method are no higher than the unit amounts billed by XES to other affiliates for the same or similar services and represent the actual costs of the services.

Q. Why is it appropriate to allocate costs based upon the "Number of Employees" method for the costs captured in the cost centers that use that allocation method?

A. For the cost centers that use the "Number of Employees" method as the allocator, the costs are driven by the employees. For example, Cost Center 200165 – PeopleSoft, which uses the "Number of Employees" method as the allocator, captures costs for the corporate human resources system used by all of the affiliates. Thus, this cost center allocates costs among the Xcel Energy legal entities based upon the proportionate share of employees of each Xcel Energy legal entity (i.e., the number of employees of a particular legal entity as a percentage of the total number of employees of all of the legal entities). This allocation reflects cost causation and the distribution of the benefits of the services received. For the cost centers that assign costs based upon this allocation method, the per unit amounts charged by XES to SPS as a result of the application of this allocation method are no higher than the unit amounts billed by XES to other affiliates for the same or similar services and represent the actual costs of the services.

Q. You have covered the allocation methods used to bill 96.5% of the costs associated with this affiliate class. Why have you not specifically covered the remaining 3.5% of the costs of this class?

A. I have described the predominant allocation methods associated with this affiliate class. The remaining costs are billed using 22 different allocators, no one of which is used to bill more than 0.75% of the costs. The cost centers (billing methods) used to charge the remaining 3.5% of the costs in this class are presented in my Attachment MOR-RR-B(CD), discussed earlier. A reader may reference that attachment and then refer to the specific cost center (billing method) summary provided in Mr. Baumgarten Attachment RLB-RR-12 for an explanation of the particular allocators used and the cost drivers for the activities reflected in that particular cost center.

Q. Have you determined that the costs reflected in the remaining 3.5% of costs associated with this class of services have been billed using an appropriate billing method and allocation method?

A. Yes. I, or an IT Operations staff member working at my direction, have reviewed each of the cost centers and the associated allocators used to bill the remaining 3.5% of the costs of this class. The cost drivers reflected in the allocation method used to bill the costs of each cost center (billing method) are consistent with and reflect the cost drivers of the services captured in each particular cost center (billing method). Therefore, the billing methods and allocation methods are appropriate because the allocation of costs is in accordance with the distribution of the benefits

received by SPS and are no higher than the per unit costs charged to other affiliates for the same or similar types of services.

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

A. Yes.

AFFIDAVIT

STATE OF MINNESOTA)
)
COUNTY OF WASHINGTON)

MICHAEL O. REMINGTON, first being sworn on his oath, states:

I am the witness identified in the preceding testimony. I have read the testimony and the accompanying attachment(s) and am familiar with the 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.

MICHAEL O. REMINGTON

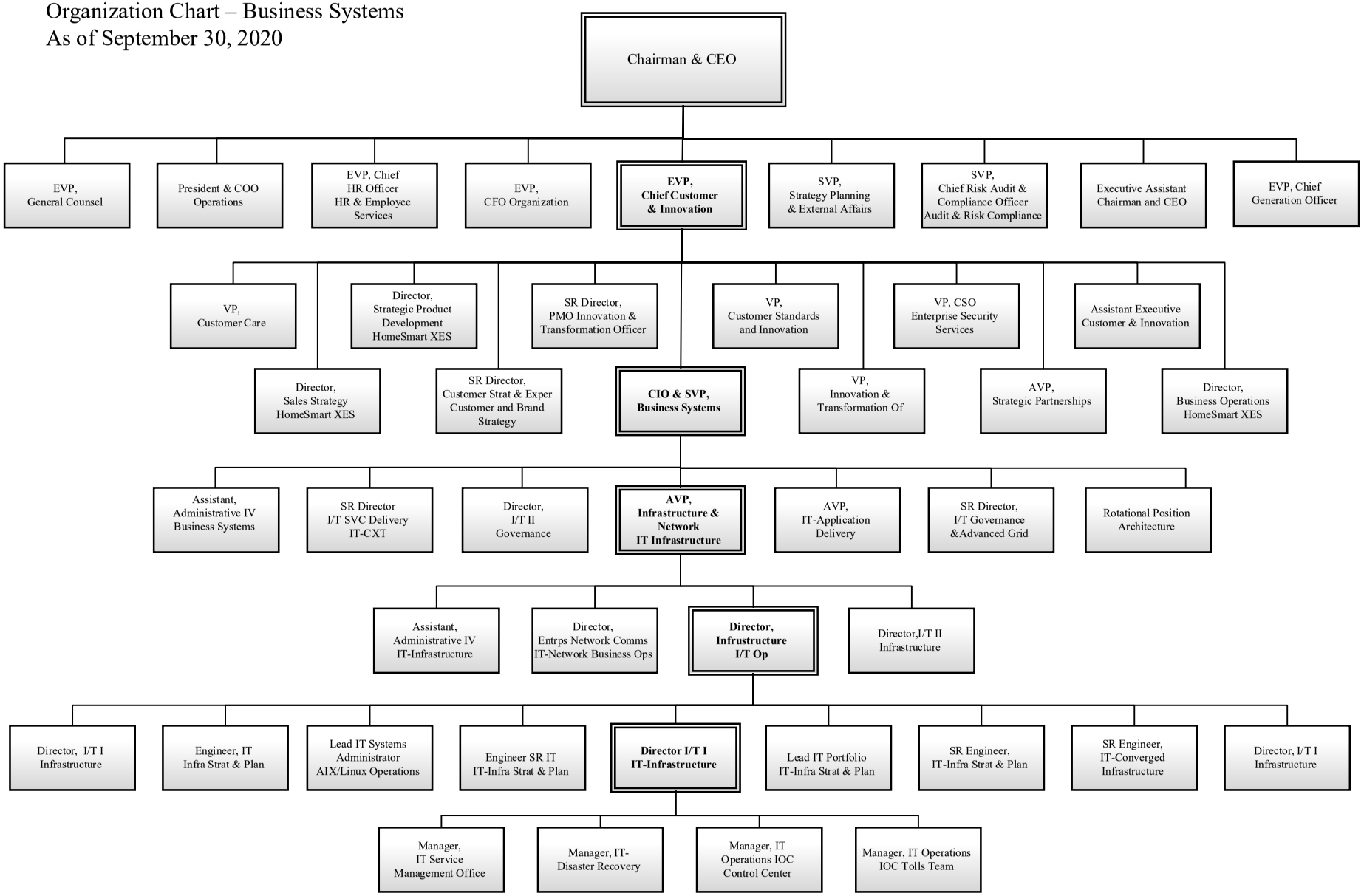
Subscribed and sworn to before me this 27th day of January, 2021 by MICHAEL O. REMINGTON.

MARY E GRILLI
NOTARY PUBLIC - MINNESOTA
My Commission Expires Jan. 31, 2025

Notary Public, State of Minnesota

My Commission Expires: Jan 31, 2025

Southwestern Public Service Company
Organization Chart – Business Systems
As of September 30, 2020



Southwestern Public Service Company

Business Systems Capital Additions
July 1, 2019 through September 30, 2020

	(A)	(B)	(C)	(D)	(E)	(F)
Line No.	**WBS Level 4 Number**	**WBS Level 4 Description**	**Asset Class**	**Witness**	**Project Category**	**WBS Level 2 Number**
1	D.0001804.324.001.004	Purch Wireless Cunningham NM	Electric General	Remington	Aging Technology	D.0001804.324
2						D.0001804.324 Total
3	D.0001804.327.001.011	Purch Wireless Levelland SC SPS	Electric General	Remington	Enhance Capabilities	D.0001804.327
4	D.0001804.327.001.017	Purch Wireless Seminole SC SPS	Electric General	Remington	Enhance Capabilities	D.0001804.327
5						D.0001804.327 Total
6	D.0001804.396.001.004	Purch Wireless Carlsbad NM	Electric General	Remington	Enhance Capabilities	D.0001804.396
7	D.0001804.396.001.003	Purch Wireless Clovis NM	Electric General	Remington	Enhance Capabilities	D.0001804.396
8						D.0001804.396 Total
9	D.0001804.397.001.003	Purch Wireless HW Harrington TX	Electric General	Remington	Enhance Capabilities	D.0001804.397
10	D.0001804.397.001.006	Purch Wireless HW Canyon SC TX	Electric General	Remington	Enhance Capabilities	D.0001804.397
11	D.0001804.397.001.009	ITC-Purch Wireless HW Pampa TX	Electric General	Remington	Enhance Capabilities	D.0001804.397
12	D.0001804.397.001.007	ITC-Purch Wireless HW Dumas TX	Electric General	Remington	Enhance Capabilities	D.0001804.397
13	D.0001804.397.001.008	ITC-Purch Wireless HW Amarillo TX	Electric General	Remington	Enhance Capabilities	D.0001804.397
14	D.0001804.397.001.010	ITC-Purch Wireless HW Harrington TX	Electric General	Remington	Enhance Capabilities	D.0001804.397
15						D.0001804.397 Total
16	D.0001821.232.001.003	Purch 2017 Printer SPS	Electric General	Remington	Aging Technology	D.0001821.232
17						D.0001821.232 Total
18	D.0001821.311.001.001	2018 Planned PC SPS	Electric General	Remington	Aging Technology	D.0001821.311
19						D.0001821.311 Total
20	D.0001821.527.001.003	Purch Handheld FC300 Amarillo SPS	Electric General	Remington	Aging Technology	D.0001821.527
21						D.0001821.527 Total
22	D.0001822.008.001.007	Purch Sub Frame Relay Roosevelt SPS	Electric General	Remington	Aging Technology	D.0001822.008
23	D.0001822.008.001.002	Purch Sub Frame Relay Battleaxe NM	Electric General	Remington	Aging Technology	D.0001822.008
24	D.0001822.008.001.003	Purch Sub Frame Relay Loving NM	Electric General	Remington	Aging Technology	D.0001822.008
25						D.0001822.008 Total
26	D.0001822.010.001.036	Purch Sub Frame Relay Lockney SPS	Electric General	Remington	Aging Technology	D.0001822.010
27	D.0001822.010.001.032	Purch Sub Frame Relay Diamondback	Electric General	Remington	Aging Technology	D.0001822.010
28	D.0001822.010.001.074	Purch Sub Frame Curry County SPS	Electric General	Remington	Aging Technology	D.0001822.010
29	D.0001822.010.001.101	Purch Sub Frame Denver City SPS	Electric General	Remington	Aging Technology	D.0001822.010
30	D.0001822.010.001.075	Purch Sub Frame Relay Randall SPS	Electric General	Remington	Aging Technology	D.0001822.010
31	D.0001822.010.001.103	Purch Sub Frame Relay Lamar SPS	Electric General	Remington	Aging Technology	D.0001822.010
32	D.0001822.010.001.060	Purch Sub Frame Relay Amarillo SPS	Electric General	Remington	Aging Technology	D.0001822.010
33						D.0001822.010 Total
34	D.0001822.057.001.004	Purch Sub Frame Blanco Sub SPS	Electric General	Remington	Aging Technology	D.0001822.057
35	D.0001822.057.001.005	Purch Sub Frame Coulter Sub SPS	Electric General	Remington	Aging Technology	D.0001822.057
36	D.0001822.057.001.007	Purch Sub Frame Deaf Smith Sub SPS	Electric General	Remington	Aging Technology	D.0001822.057
37	D.0001822.057.001.009	Purch Sub Frame Hereford NE Sub SPS	Electric General	Remington	Aging Technology	D.0001822.057
38	D.0001822.057.001.012	Purch Sub Frame LaPlata Sub SPS	Electric General	Remington	Aging Technology	D.0001822.057
39	D.0001822.057.001.015	Purch Sub Frame Riverview Sub SPS	Electric General	Remington	Aging Technology	D.0001822.057
40	D.0001822.057.001.016	Purch Sub Frame Puckett West Sub SP	Electric General	Remington	Aging Technology	D.0001822.057
41	D.0001822.057.001.017	Purch Sub Frame Sunset Sub SPS	Electric General	Remington	Aging Technology	D.0001822.057

Southwestern Public Service Company

Business Systems Capital Additions
July 1, 2019 through September 30, 2020

	(A)	(G)	(H)	(I)	(J)	(K)	(L)	(M)
Line No.	WBS Level 4 Number	WBS Level 2 Description	In-Service Date	Additions (Jul 2019 - Sep 2020)	XES Charges (Included in Column I)	Other Affiliate Charges (Included in Column I)	Total Affiliate Charges (Included in Column I)	Total Native Charges (Columns I less L) Within the Total Additions to Plant-in-Service Shown in Column (I)
1	D.0001804.324.001.004	Purch Wireless HW NM SPS	201706	$ (0.09)	$ -	$ -	$ -	$ (0.09)
2				(0.09)	-	-	-	(0.09)
3	D.0001804.327.001.011	Purch Wireless HW SPS	201901	87.07	87.04	-	87.04	0.03
4	D.0001804.327.001.017	Purch Wireless HW SPS	201902	3,363.85	3,385.44	-	3,385.44	(21.59)
5				3,450.92	3,472.48	-	3,472.48	(21.56)
6	D.0001804.396.001.004	Purch Wireless HW NM	201903	618.01	617.80	-	617.80	0.21
7	D.0001804.396.001.003	Purch Wireless HW NM	201903	247.19	247.11	-	247.11	0.08
8				865.20	864.91	-	864.91	0.29
9	D.0001804.397.001.003	Purch Wireless HW SPS	201811	640.28	640.06	-	640.06	0.22
10	D.0001804.397.001.006	Purch Wireless HW SPS	201903	596.23	617.80	-	617.80	(21.57)
11	D.0001804.397.001.009	Purch Wireless HW SPS	201906	1,869.90	1,900.90	-	1,900.90	(31.00)
12	D.0001804.397.001.007	Purch Wireless HW SPS	201906	3,304.28	3,346.87	-	3,346.87	(42.59)
13	D.0001804.397.001.008	Purch Wireless HW SPS	201906	(300.00)	(270.35)	-	(270.35)	(29.65)
14	D.0001804.397.001.010	Purch Wireless HW SPS	201906	1,146.50	-	-	-	1,146.50
15				7,257.19	6,235.28	-	6,235.28	1,021.91
16	D.0001821.232.001.003	2017 Unplanned PC Refresh SPS	201708	(3,803.92)	-	-	-	(3,803.92)
17				(3,803.92)	-	-	-	(3,803.92)
18	D.0001821.311.001.001	2018 Planned PC SPS	201804	820.04	(17,116.38)	-	(17,116.38)	17,936.42
19				820.04	(17,116.38)	-	(17,116.38)	17,936.42
20	D.0001821.527.001.003	Purch 2017 Handheld SPS	201801	21.67	-	-	-	21.67
21				21.67	-	-	-	21.67
22	D.0001822.008.001.007	Purch Sub Frame Relay Equip NM	201612	5,059.47	-	-	-	5,059.47
23	D.0001822.008.001.002	Purch Sub Frame Relay Equip NM	201611	(8.63)	-	-	-	(8.63)
24	D.0001822.008.001.003	Purch Sub Frame Relay Equip NM	201612	2,402.06	-	-	-	2,402.06
25				7,452.90	-	-	-	7,452.90
26	D.0001822.010.001.036	Purch Sub Frame Relay Equip SP	201802	3,601.85	-	-	-	3,601.85
27	D.0001822.010.001.032	Purch Sub Frame Relay Equip SP	201611	9,452.04	-	-	-	9,452.04
28	D.0001822.010.001.074	Purch Sub Frame Relay Equip SP	201610	5,832.45	-	-	-	5,832.45
29	D.0001822.010.001.101	Purch Sub Frame Relay Equip SP	201610	4,075.59	-	-	-	4,075.59
30	D.0001822.010.001.075	Purch Sub Frame Relay Equip SP	201612	2,854.13	-	-	-	2,854.13
31	D.0001822.010.001.103	Purch Sub Frame Relay Equip SP	201610	(1,485.53)	-	-	-	(1,485.53)
32	D.0001822.010.001.060	Purch Sub Frame Relay Equip SP	201611	4,540.14	-	-	-	4,540.14
33				28,870.67	-	-	-	28,870.67
34	D.0001822.057.001.004	Purch Sub Frame BAU Sites TX SPS	201708	1,695.10	-	-	-	1,695.10
35	D.0001822.057.001.005	Purch Sub Frame BAU Sites TX SPS	201703	(22.95)	-	-	-	(22.95)
36	D.0001822.057.001.007	Purch Sub Frame BAU Sites TX SPS	201703	3,809.36	-	-	-	3,809.36
37	D.0001822.057.001.009	Purch Sub Frame BAU Sites TX SPS	201703	(41.50)	-	-	-	(41.50)
38	D.0001822.057.001.012	Purch Sub Frame BAU Sites TX SPS	201708	219.55	-	-	-	219.55
39	D.0001822.057.001.015	Purch Sub Frame BAU Sites TX SPS	201705	4,571.97	-	-	-	4,571.97
40	D.0001822.057.001.016	Purch Sub Frame BAU Sites TX SPS	201705	1,605.64	-	-	-	1,605.64
41	D.0001822.057.001.017	Purch Sub Frame BAU Sites TX SPS	201708	706.32	-	-	-	706.32

Southwestern Public Service Company

Business Systems Capital Additions
July 1, 2019 through September 30, 2020

	(A)	(B)	(C)	(D)	(E)	(F)
Line No.	**WBS Level 4 Number**	**WBS Level 4 Description**	**Asset Class**	**Witness**	**Project Category**	**WBS Level 2 Number**
42	D.0001822.057.001.018	Purch Sub Frame Muleshoe West Sub S	Electric General	Remington	Aging Technology	D.0001822.057
43	D.0001822.057.001.031	Purch Sub Frame Y-13 TX	Electric General	Remington	Aging Technology	D.0001822.057
44	D.0001822.057.001.022	Purch Sub Frame Dawn Sub SPS	Electric General	Remington	Aging Technology	D.0001822.057
45	D.0001822.057.001.066	Purch Sub Frame Buffalo TX	Electric General	Remington	Aging Technology	D.0001822.057
46	D.0001822.057.001.008	Purch Sub Frame Herford Sub SPS	Electric General	Remington	Aging Technology	D.0001822.057
47						D.0001822.057 Total
48	D.0001822.058.001.002	Purch Sub Frame Portales NM SPS	Electric General	Remington	Aging Technology	D.0001822.058
49	D.0001822.058.001.004	Purch Sub Frame Chavez NM SPS	Electric General	Remington	Aging Technology	D.0001822.058
50	D.0001822.058.001.006	Purch Sub FramePCA NM SPS	Electric General	Remington	Aging Technology	D.0001822.058
51	D.0001822.058.001.007	Purch Sub Frame Quahada Sub NM SPS	Electric General	Remington	Aging Technology	D.0001822.058
52	D.0001822.058.001.008	Purch Sub Frame Sagebrush NM SPS	Electric General	Remington	Aging Technology	D.0001822.058
53	D.0001822.058.001.010	Purch Sub Frame Chaves Sub NM SPS	Electric General	Remington	Aging Technology	D.0001822.058
54						D.0001822.058 Total
55	D.0001822.063.001.001	Purch Sub Frame Hardesty OK	Electric General	Remington	Aging Technology	D.0001822.063
56						D.0001822.063 Total
57	D.0001839.063.001.018	Purch Pampa Paging Antenna SPS	Electric General	Remington	Aging Technology	D.0001839.063
58	D.0001839.063.001.003	Purch Sterley Tower Light Sys SPS	Electric General	Remington	Aging Technology	D.0001839.063
59						D.0001839.063 Total
60	D.0001839.148.001.002	Purch Storage 2650 HW Amarillo TX	Electric General	Remington	Aging Technology	D.0001839.148
61						D.0001839.148 Total
62	D.0001839.375.001.003	Purch VOIP HW SPS	Electric General	Remington	Aging Technology	D.0001839.375
63						D.0001839.375 Total
64	D.0001839.663.001.001	Purch Amarillo HQ Net Equip SPS	Electric General	Remington	Aging Technology	D.0001839.663
65						D.0001839.663 Total
66	D.0002016.004.001.015	Purch MPLS Unpl Shell TX	Electric General	Remington	Aging Technology	D.0002016.004
67	D.0002016.004.001.011	Purch MPLS Unpl Pampa TX	Electric General	Remington	Aging Technology	D.0002016.004
68	D.0002016.004.001.009	Purch MPLS Unpl Lefors TX	Electric General	Remington	Aging Technology	D.0002016.004
69						D.0002016.004 Total
70	D.0002016.017.001.008	Purch MPLS Unpl Lea Cty NM	Electric General	Remington	Aging Technology	D.0002016.017
71	D.0002016.017.001.007	Purch MPLS Unpl Kiowa NM	Electric General	Remington	Aging Technology	D.0002016.017
72	D.0002016.017.001.012	Purch MPLS Unpl Quay NM	Electric General	Remington	Aging Technology	D.0002016.017
73	D.0002016.017.001.010	Purch MPLS Unpl Loving NM	Electric General	Remington	Aging Technology	D.0002016.017
74	D.0002016.017.001.001	Purch MPLS Unpl Capitan NM	Electric General	Remington	Aging Technology	D.0002016.017
75	D.0002016.017.001.006	Purch MPLS Unpl Hobbs NM	Electric General	Remington	Aging Technology	D.0002016.017
76						D.0002016.017 Total
77	D.0001783.021.001.001	Purch LMR Radio HW Andrew TX	Electric General	Remington	Aging Technology	D.0001783.021
78						D.0001783.021 Total
79	D.0002014.001.001.014	Purch WAN HW Seminole TX	Electric General	Remington	Aging Technology	D.0002014.001
80	D.0002014.001.001.005	Purch WAN HW Hillside TX	Electric General	Remington	Aging Technology	D.0002014.001
81	D.0002014.001.001.026	Purch WAN HW Spearman TX	Electric General	Remington	Aging Technology	D.0002014.001
82	D.0002014.001.001.012	Purch WAN HW Outpost TX	Electric General	Remington	Aging Technology	D.0002014.001

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	(A)	(G)	(H)	(I)	(J)	(K)	(L)	(M)
Line No.	WBS Level 4 Number	WBS Level 2 Description	In-Service Date	Additions (Jul 2019 - Sep 2020)	XES Charges (Included in Column I)	Other Affiliate Charges (Included in Column I)	Total Affiliate Charges (Included in Column I)	Total Native Charges (Columns I less L) Within the Total Additions to Plant-in-Service Shown in Column (I)
42	D.0001822.057.001.018	Purch Sub Frame BAU Sites TX SPS	201706	3,423.47	-	-	-	3,423.47
43	D.0001822.057.001.031	Purch Sub Frame BAU Sites TX SPS	201709	(2,002.52)	-	-	-	(2,002.52)
44	D.0001822.057.001.022	Purch Sub Frame BAU Sites TX SPS	201703	5.20	-	-	-	5.20
45	D.0001822.057.001.066	Purch Sub Frame BAU Sites TX SPS	201708	2.21	-	-	-	2.21
46	D.0001822.057.001.008	Purch Sub Frame BAU Sites TX SPS	202004	0.56	-	-	-	0.56
47				13,972.41	-	-	-	13,972.41
48	D.0001822.058.001.002	Purch Sub Frame BAU Sites NM SPS	201703	2,825.17	-	-	-	2,825.17
49	D.0001822.058.001.004	Purch Sub Frame BAU Sites NM SPS	201712	4,298.88	-	-	-	4,298.88
50	D.0001822.058.001.006	Purch Sub Frame BAU Sites NM SPS	201703	3,248.95	-	-	-	3,248.95
51	D.0001822.058.001.007	Purch Sub Frame BAU Sites NM SPS	201703	(26.38)	-	-	-	(26.38)
52	D.0001822.058.001.008	Purch Sub Frame BAU Sites NM SPS	201703	706.51	-	-	-	706.51
53	D.0001822.058.001.010	Purch Sub Frame BAU Sites NM SPS	202001	156,409.58	-	-	-	156,409.58
54				167,462.71	-	-	-	167,462.71
55	D.0001822.063.001.001	Purch Sub Frame Hardesty OK	201708	3,979.20	-	-	-	3,979.20
56				3,979.20	-	-	-	3,979.20
57	D.0001839.063.001.018	2015 IT INFS Network Refresh S	201602	0.32	-	-	-	0.32
58	D.0001839.063.001.003	2015 IT INFS Network Refresh S	201507	1,636.36	-	-	-	1,636.36
59				1,636.68	-	-	-	1,636.68
60	D.0001839.148.001.002	2018 Storage Annual Refresh SP	201807	737.37	-	-	-	737.37
61				737.37	-	-	-	737.37
62	D.0001839.375.001.003	Purch 2015 VOIP HW SPS	201705	(68.05)	-	-	-	(68.05)
63				(68.05)	-	-	-	(68.05)
64	D.0001839.663.001.001	Purch Amarillo HQ Net Equip SPS	201706	1.02	-	-	-	1.02
65				1.02	-	-	-	1.02
66	D.0002016.004.001.015	Purch T&D MPLS - Unplanned (2017) S	201804	2,074.38	-	-	-	2,074.38
67	D.0002016.004.001.011	Purch T&D MPLS - Unplanned (2017) S	201905	(8,308.92)	-	-	-	(8,308.92)
68	D.0002016.004.001.009	Purch T&D MPLS - Unplanned (2017) S	202004	2.78	-	-	-	2.78
69				(6,231.76)	-	-	-	(6,231.76)
70	D.0002016.017.001.008	Purch T&D MPLS - Unplanned (2017) N	201809	16,053.98	-	-	-	16,053.98
71	D.0002016.017.001.007	Purch T&D MPLS - Unplanned (2017) N	201811	(15.53)	-	-	-	(15.53)
72	D.0002016.017.001.012	Purch T&D MPLS - Unplanned (2017) N	201911	12,458.80	-	-	-	12,458.80
73	D.0002016.017.001.010	Purch T&D MPLS - Unplanned (2017) N	201907	28,922.69	-	-	-	28,922.69
74	D.0002016.017.001.001	Purch T&D MPLS - Unplanned (2017) N	202005	9,343.88	-	-	-	9,343.88
75	D.0002016.017.001.006	Purch T&D MPLS - Unplanned (2017) N	202005	15,041.08	-	-	-	15,041.08
76				81,804.90	-	-	-	81,804.90
77	D.0001783.021.001.001	Purch LMR Radio HW TX	201804	574.76	-	-	-	574.76
78				574.76	-	-	-	574.76
79	D.0002014.001.001.014	Purch WAN HW SPS-BSPRJ0001170	201903	25,666.40	216.14	-	216.14	25,450.26
80	D.0002014.001.001.005	Purch WAN HW SPS-BSPRJ0001170	201903	1,522.41	-	-	-	1,522.41
81	D.0002014.001.001.026	Purch WAN HW SPS-BSPRJ0001170	201905	(0.93)	-	-	-	(0.93)
82	D.0002014.001.001.012	Purch WAN HW SPS-BSPRJ0001170	201905	9,397.57	-	-	-	9,397.57

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	(A)	(B)	(C)	(D)	(E)	(F)
Line No.	WBS Level 4 Number	WBS Level 4 Description	Asset Class	Witness	Project Category	WBS Level 2 Number
83	D.0002014.001.001.009	Purch WAN HW Lubbock East TX	Electric General	Remington	Aging Technology	D.0002014.001
84	D.0002014.001.001.023	Purch WAN HW Quincy TX	Electric General	Remington	Aging Technology	D.0002014.001
85	D.0002014.001.001.025	Purch WAN HW Perryton TX	Electric General	Remington	Aging Technology	D.0002014.001
86	D.0002014.001.001.018	Purch WAN HW Coulter TX	Electric General	Remington	Aging Technology	D.0002014.001
87	D.0002014.001.001.006	Purch WAN HW Ink Basin TX	Electric General	Remington	Aging Technology	D.0002014.001
88	D.0002014.001.001.002	Purch WAN HW Canyon TX	Electric General	Remington	Aging Technology	D.0002014.001
89	D.0002014.001.001.013	Purch WAN HW Potter TX	Electric General	Remington	Aging Technology	D.0002014.001
90	D.0002014.001.001.016	Purch WAN HW Yoakum TX	Electric General	Remington	Aging Technology	D.0002014.001
91	D.0002014.001.001.007	Purch WAN HW Jones TX	Electric General	Remington	Aging Technology	D.0002014.001
92	D.0002014.001.001.029	ITC-Purch WAN HW Tuco TX	Electric General	Remington	Aging Technology	D.0002014.001
93	D.0002014.001.001.004	Purch WAN HW HACO TX	Electric General	Remington	Aging Technology	D.0002014.001
94	D.0002014.001.001.011	Purch WAN HW Mahoney TX	Electric General	Remington	Aging Technology	D.0002014.001
95	D.0002014.001.001.022	Purch WAN HW Cochran TX	Electric General	Remington	Aging Technology	D.0002014.001
96	D.0002014.001.001.020	Purch WAN HW Seagraves TX	Electric General	Remington	Aging Technology	D.0002014.001
97	D.0002014.001.001.008	Purch WAN HW Last Draw TX	Electric General	Remington	Aging Technology	D.0002014.001
98	D.0002014.001.001.003	Purch WAN HW Cargill TX	Electric General	Remington	Aging Technology	D.0002014.001
99	D.0002014.001.001.028	Purch WAN HW Lynn Cty Tahoka TX	Electric General	Remington	Aging Technology	D.0002014.001
100	D.0002014.001.001.030	ITC-Purch WAN HW Amarillo Record TX	Electric General	Remington	Aging Technology	D.0002014.001
101	D.0002014.001.001.021	Purch WAN HW Mustang TX	Electric General	Remington	Aging Technology	D.0002014.001
102	D.0002014.001.001.015	Purch WAN HW Soncy TX	Electric General	Remington	Aging Technology	D.0002014.001
103	D.0002014.001.001.024	Purch WAN HW Dumas TX	Electric General	Remington	Aging Technology	D.0002014.001
104	D.0002014.001.001.027	Purch WAN HW Blackhawk Borger TX	Electric General	Remington	Aging Technology	D.0002014.001
105	D.0002014.001.001.019	Purch WAN HW Terry TX	Electric General	Remington	Aging Technology	D.0002014.001
106						D.0002014.001 Total
107	D.0002014.002.001.003	Purch WAN HW Roswell NM	Electric General	Remington	Aging Technology	D.0002014.002
108	D.0002014.002.001.004	Purch WAN HW Sierra NM	Electric General	Remington	Aging Technology	D.0002014.002
109	D.0002014.002.001.006	Purch WAN HW Cunningham NM	Electric General	Remington	Aging Technology	D.0002014.002
110	D.0002014.002.001.007	Purch WAN HW Artesia NM	Electric General	Remington	Aging Technology	D.0002014.002
111	D.0002014.002.001.009	Purch WAN HW Tucumari NM	Electric General	Remington	Aging Technology	D.0002014.002
112	D.0002014.002.001.002	Purch WAN HW Eddy NM	Electric General	Remington	Aging Technology	D.0002014.002
113	D.0002014.002.001.012	ITC-Purch WAN HW S Loving NM	Electric General	Remington	Aging Technology	D.0002014.002
114	D.0002014.002.001.005	Purch WAN HW Maddox NM	Electric General	Remington	Aging Technology	D.0002014.002
115	D.0002014.002.001.011	ITC-Purch WAN HW Hagerman NM	Electric General	Remington	Aging Technology	D.0002014.002
116	D.0002014.002.001.008	Purch WAN HW Carlsbad NM	Electric General	Remington	Aging Technology	D.0002014.002
117	D.0002014.002.001.010	ITC-Purch WAN HW Cottonwood NM	Electric General	Remington	Aging Technology	D.0002014.002
118	D.0002014.002.001.013	ITC-Purch WAN HW Tucumcari SC NM	Electric General	Remington	Aging Technology	D.0002014.002
119						D.0002014.002 Total
120	D.0002014.009.001.008	ITC-Purch WAN Generator Kermac NM	Electric General	Remington	Aging Technology	D.0002014.009
121	D.0002014.009.001.002	ITC-Purch WAN Generator Buckeye NM	Electric General	Remington	Aging Technology	D.0002014.009
122	D.0002014.009.001.006	ITC-Purch WAN Generator Eddy Cty NM	Electric General	Remington	Aging Technology	D.0002014.009
123	D.0002014.009.001.004	ITC-Purch WAN Generator Carlsbad NM	Electric General	Remington	Aging Technology	D.0002014.009

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	(A)	(G)	(H)	(I)	(J)	(K)	(L)	(M)
Line No.	WBS Level 4 Number	WBS Level 2 Description	In-Service Date	Additions (Jul 2019 - Sep 2020)	XES Charges (Included in Column I)	Other Affiliate Charges (Included in Column I)	Total Affiliate Charges (Included in Column I)	Total Native Charges (Columns I less L) Within the Total Additions to Plant-in-Service Shown in Column (I)
83	D.0002014.001.001.009	Purch WAN HW SPS-BSPRJ0001170	201905	(5.20)	-	-	-	(5.20)
84	D.0002014.001.001.023	Purch WAN HW SPS-BSPRJ0001170	201905	304.62	-	-	-	304.62
85	D.0002014.001.001.025	Purch WAN HW SPS-BSPRJ0001170	201905	(0.21)	-	-	-	(0.21)
86	D.0002014.001.001.018	Purch WAN HW SPS-BSPRJ0001170	202001	63,127.12	-	-	-	63,127.12
87	D.0002014.001.001.006	Purch WAN HW SPS-BSPRJ0001170	201908	54,023.59	-	-	-	54,023.59
88	D.0002014.001.001.002	Purch WAN HW SPS-BSPRJ0001170	201905	(1.87)	-	-	-	(1.87)
89	D.0002014.001.001.013	Purch WAN HW SPS-BSPRJ0001170	201912	415,243.52	-	-	-	415,243.52
90	D.0002014.001.001.016	Purch WAN HW SPS-BSPRJ0001170	201905	(2,601.75)	-	-	-	(2,601.75)
91	D.0002014.001.001.007	Purch WAN HW SPS-BSPRJ0001170	201905	(6.64)	-	-	-	(6.64)
92	D.0002014.001.001.029	Purch WAN HW SPS-BSPRJ0001170	202004	(0.01)	-	-	-	(0.01)
93	D.0002014.001.001.004	Purch WAN HW SPS-BSPRJ0001170	201905	(11.89)	-	-	-	(11.89)
94	D.0002014.001.001.011	Purch WAN HW SPS-BSPRJ0001170	201908	51,762.93	-	-	-	51,762.93
95	D.0002014.001.001.022	Purch WAN HW SPS-BSPRJ0001170	201905	22,379.01	1,175.12	-	1,175.12	21,203.89
96	D.0002014.001.001.020	Purch WAN HW SPS-BSPRJ0001170	201905	(2.25)	-	-	-	(2.25)
97	D.0002014.001.001.008	Purch WAN HW SPS-BSPRJ0001170	201908	234,016.14	-	-	-	234,016.14
98	D.0002014.001.001.003	Purch WAN HW SPS-BSPRJ0001170	201905	8,395.03	-	-	-	8,395.03
99	D.0002014.001.001.028	Purch WAN HW SPS-BSPRJ0001170	201906	16,130.08	-	-	-	16,130.08
100	D.0002014.001.001.030	Purch WAN HW SPS-BSPRJ0001170	202004	98,831.35	19,236.35	-	19,236.35	79,595.00
101	D.0002014.001.001.021	Purch WAN HW SPS-BSPRJ0001170	201905	(2.77)	-	-	-	(2.77)
102	D.0002014.001.001.015	Purch WAN HW SPS-BSPRJ0001170	201905	5,940.69	-	-	-	5,940.69
103	D.0002014.001.001.024	Purch WAN HW SPS-BSPRJ0001170	201905	(0.40)	-	-	-	(0.40)
104	D.0002014.001.001.027	Purch WAN HW SPS-BSPRJ0001170	202004	39,282.02	2,907.17	-	2,907.17	36,374.85
105	D.0002014.001.001.019	Purch WAN HW SPS-BSPRJ0001170	201905	(9.77)	-	-	-	(9.77)
106				1,043,378.79	23,534.78	-	23,534.78	1,019,844.01
107	D.0002014.002.001.003	Purch WAN HW NM	201903	(66.08)	-	-	-	(66.08)
108	D.0002014.002.001.004	Purch WAN HW NM	201905	8,710.67	-	-	-	8,710.67
109	D.0002014.002.001.006	Purch WAN HW NM	201905	1,881.29	-	-	-	1,881.29
110	D.0002014.002.001.007	Purch WAN HW NM	201911	211,170.93	-	-	-	211,170.93
111	D.0002014.002.001.009	Purch WAN HW NM	201906	(397.33)	-	-	-	(397.33)
112	D.0002014.002.001.002	Purch WAN HW NM	201905	(22.52)	-	-	-	(22.52)
113	D.0002014.002.001.012	Purch WAN HW NM	201911	18,855.64	-	-	-	18,855.64
114	D.0002014.002.001.005	Purch WAN HW NM	201905	0.43	-	-	-	0.43
115	D.0002014.002.001.011	Purch WAN HW NM	202004	50,392.77	-	-	-	50,392.77
116	D.0002014.002.001.008	Purch WAN HW NM	201905	6,066.40	-	-	-	6,066.40
117	D.0002014.002.001.010	Purch WAN HW NM	202004	46,130.62	-	-	-	46,130.62
118	D.0002014.002.001.013	Purch WAN HW NM	202004	0.06	(1,363.50)	-	(1,363.50)	1,363.56
119				342,722.88	(1,363.50)	-	(1,363.50)	344,086.38
120	D.0002014.009.001.008	ITC-Purch WAN Generator NM	202002	77,773.32	-	-	-	77,773.32
121	D.0002014.009.001.002	ITC-Purch WAN Generator NM	202002	86,487.71	-	-	-	86,487.71
122	D.0002014.009.001.006	ITC-Purch WAN Generator NM	202002	87,119.60	-	-	-	87,119.60
123	D.0002014.009.001.004	ITC-Purch WAN Generator NM	202002	126,231.93	-	-	-	126,231.93

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	(A)	(B)	(C)	(D)	(E)	(F)
Line No.	**WBS Level 4 Number**	**WBS Level 4 Description**	**Asset Class**	**Witness**	**Project Category**	**WBS Level 2 Number**
124	D.0002014.009.001.003	ITC-Purch WAN Generator Artesia NM	Electric General	Remington	Aging Technology	D.0002014.009
125	D.0002014.009.001.007	ITC-Purch WAN Generator Roswell NM	Electric General	Remington	Aging Technology	D.0002014.009
126	D.0002014.009.001.005	ITC-Purch WAN Generator Curry NM	Electric General	Remington	Aging Technology	D.0002014.009
127	D.0002014.009.001.009	ITC-Purch WAN Generator Potash NM	Electric General	Remington	Aging Technology	D.0002014.009
128						D.0002014.009 Total
129	D.0002014.003.001.018	ITC-Purch WAN Generator Flint Hill	Electric General	Remington	Aging Technology	D.0002014.003
130	D.0002014.003.001.013	ITC-Purch WAN Generator Happy TX	Electric General	Remington	Aging Technology	D.0002014.003
131	D.0002014.003.001.019	ITC-Purch WAN Generator Halfway TX	Electric General	Remington	Aging Technology	D.0002014.003
132	D.0002014.003.001.006	ITC-Purch WAN Generator Cochran TX	Electric General	Remington	Aging Technology	D.0002014.003
133	D.0002014.003.001.003	ITC-Purch WAN Generator Lubbock TX	Electric General	Remington	Aging Technology	D.0002014.003
134	D.0002014.003.001.009	ITC-Purch WAN Generator Sundown TX	Electric General	Remington	Aging Technology	D.0002014.003
135	D.0002014.003.001.017	ITC-Purch WAN Generator Coldwater T	Electric General	Remington	Aging Technology	D.0002014.003
136	D.0002014.003.001.016	ITC-Purch WAN Generator Pampa TX	Electric General	Remington	Aging Technology	D.0002014.003
137	D.0002014.003.001.004	ITC-Purch WAN Generator Muleshoe TX	Electric General	Remington	Aging Technology	D.0002014.003
138	D.0002014.003.001.005	ITC-Purch WAN Generator Dimmett TX	Electric General	Remington	Aging Technology	D.0002014.003
139	D.0002014.003.001.010	ITC-Purch WAN Generator Abernathy T	Electric General	Remington	Aging Technology	D.0002014.003
140	D.0002014.003.001.008	ITC-Purch WAN Generator Levelland T	Electric General	Remington	Aging Technology	D.0002014.003
141	D.0002014.003.001.002	ITC-Purch WAN Generator Bushland TX	Electric General	Remington	Aging Technology	D.0002014.003
142	D.0002014.003.001.007	ITC-Purch WAN Generator Denver City	Electric General	Remington	Aging Technology	D.0002014.003
143						D.0002014.003 Total
144	D.0002354.004.001.001	ITC-PC Refreshes-Routine HW-SPS	Electric General	Remington	Aging Technology	D.0002354.004
145						D.0002354.004 Total
146	A.0001577.006.001.001	Purch Bus Sys Net Equip Hale Wind S	Electric General	Remington	Enhance Capabilities	A.0001577.006
147						A.0001577.006 Total
148	D.0002015.002.001.004	Purch Satellite HW Canyon TX	Electric General	Remington	Enhance Capabilities	D.0002015.002
149	D.0002015.002.001.006	Purch Satellite HW Lockney TX	Electric General	Remington	Enhance Capabilities	D.0002015.002
150						D.0002015.002 Total
151	D.0002014.013.001.001	ITC-Purch WAN Circuit HW NM	Electric General	Remington	Aging Technology	D.0002014.013
152						D.0002014.013 Total
153	D.0002193.004.001.002	ITC-Purch 2019 Plan PC HW SPS	Electric General	Remington	Aging Technology	D.0002193.004
154						D.0002193.004 Total
155	D.0002014.012.001.001	ITC-Purch WAN Circuit HW TX	Electric General	Remington	Aging Technology	D.0002014.012
156						D.0002014.012 Total
157	D.0002018.004.001.003	Purch 10G Backhaul HW Lubbock TX	Electric General	Remington	Aging Technology	D.0002018.004
158	D.0002018.004.001.002	Purch 10G Backhaul HW Amarillo TX	Electric General	Remington	Aging Technology	D.0002018.004
159						D.0002018.004 Total
160	D.0001783.020.001.002	Purch LMR Radio HW County Line NM	Electric General	Remington	Aging Technology	D.0001783.020
161	D.0001783.020.001.001	Purch LMR Radio HW China Draw NM	Electric General	Remington	Aging Technology	D.0001783.020
162						D.0001783.020 Total
163	D.0002014.010.001.002	ITC-Purch WAN Generator Taylor SC N	Electric General	Remington	Aging Technology	D.0002014.010
164	D.0002014.010.001.003	ITC-Purch WAN Generator Hobbs SC NM	Electric General	Remington	Aging Technology	D.0002014.010

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Line No.	WBS Level 4 Number	WBS Level 2 Description	In-Service Date	Additions (Jul 2019 - Sep 2020)	XES Charges (Included in Column I)	Other Affiliate Charges (Included in Column I)	Total Affiliate Charges (Included in Column I)	Total Native Charges (Columns I less L) Within the Total Additions to Plant-in-Service Shown in Column (I)
124	D.0002014.009.001.003	ITC-Purch WAN Generator NM	202002	85,254.48	-	-	-	85,254.48
125	D.0002014.009.001.007	ITC-Purch WAN Generator NM	202002	83,097.85	-	-	-	83,097.85
126	D.0002014.009.001.005	ITC-Purch WAN Generator NM	202002	81,969.40	-	-	-	81,969.40
127	D.0002014.009.001.009	ITC-Purch WAN Generator NM	201910	82,032.54	-	-	-	82,032.54
128				709,966.83	-	-	-	709,966.83
129	D.0002014.003.001.018	ITC-Purch WAN Generator TX	202004	163,244.38	589.27	-	589.27	162,655.11
130	D.0002014.003.001.013	ITC-Purch WAN Generator TX	202002	72,138.20	-	-	-	72,138.20
131	D.0002014.003.001.019	ITC-Purch WAN Generator TX	202002	71,649.42	-	-	-	71,649.42
132	D.0002014.003.001.006	ITC-Purch WAN Generator TX	202002	67,131.29	514.64	-	514.64	66,616.65
133	D.0002014.003.001.003	ITC-Purch WAN Generator TX	202002	68,876.21	322.35	-	322.35	68,553.86
134	D.0002014.003.001.009	ITC-Purch WAN Generator TX	202002	67,524.93	-	-	-	67,524.93
135	D.0002014.003.001.017	ITC-Purch WAN Generator TX	202002	60,705.09	-	-	-	60,705.09
136	D.0002014.003.001.016	ITC-Purch WAN Generator TX	202002	63,804.36	-	-	-	63,804.36
137	D.0002014.003.001.004	ITC-Purch WAN Generator TX	202002	69,315.37	1,032.27	-	1,032.27	68,283.10
138	D.0002014.003.001.005	ITC-Purch WAN Generator TX	202002	150,360.01	514.64	-	514.64	149,845.37
139	D.0002014.003.001.010	ITC-Purch WAN Generator TX	202004	129,690.20	-	-	-	129,690.20
140	D.0002014.003.001.008	ITC-Purch WAN Generator TX	202004	76,243.12	914.59	-	914.59	75,328.53
141	D.0002014.003.001.002	ITC-Purch WAN Generator TX	202002	68,550.98	1,384.95	-	1,384.95	67,166.03
142	D.0002014.003.001.007	ITC-Purch WAN Generator TX	202002	67,265.10	499.92	-	499.92	66,765.18
143				1,196,498.66	5,772.63	-	5,772.63	1,190,726.03
144	D.0002354.004.001.001	ITC-PC Refreshes-Routine HW-SPS		371,109.46	46,538.66	-	46,538.66	324,570.80
145				371,109.46	46,538.66	-	46,538.66	324,570.80
146	A.0001577.006.001.001	Purch Bus Sys Net Equip Hale Wind S	201904	17,446.07	4,280.37	948.20	5,228.57	12,217.50
147				17,446.07	4,280.37	948.20	5,228.57	12,217.50
148	D.0002015.002.001.004	Purch-Satellite Network HW SPS	202008	245,685.56	11,481.73	-	11,481.73	234,203.83
149	D.0002015.002.001.006	Purch-Satellite Network HW SPS	202008	49,233.54	7,322.62	-	7,322.62	41,910.92
150				294,919.10	18,804.35	-	18,804.35	276,114.75
151	D.0002014.013.001.001	ITC-Purch WAN Circuit HW NM	201912	1,909,667.21	298,083.91	-	298,083.91	1,611,583.30
152				1,909,667.21	298,083.91	-	298,083.91	1,611,583.30
153	D.0002193.004.001.002	ITC-Purch 2019 Plan PC HW SPS	201904	570,361.60	570,109.15	-	570,109.15	252.45
154				570,361.60	570,109.15	-	570,109.15	252.45
155	D.0002014.012.001.001	ITC-Purch WAN Circuit HW TX	201912	3,743,287.14	415,763.91	-	415,763.91	3,327,523.23
156				3,743,287.14	415,763.91	-	415,763.91	3,327,523.23
157	D.0002018.004.001.003	Purch 10GBackhaul HW SPS-BSPRJ00011	201912	932,396.25	291,182.25	-	291,182.25	641,214.00
158	D.0002018.004.001.002	Purch 10GBackhaul HW SPS-BSPRJ00011	201912	897,614.98	31,367.75	-	31,367.75	866,247.23
159				1,830,011.23	322,550.00	-	322,550.00	1,507,461.23
160	D.0001783.020.001.002	Purch LMR Radio HW NM	201906	5,399.90	2,426.68	-	2,426.68	2,973.22
161	D.0001783.020.001.001	Purch LMR Radio HW NM	201906	117,784.57	52,811.33	-	52,811.33	64,973.24
162				123,184.47	55,238.01	-	55,238.01	67,946.46
163	D.0002014.010.001.002	ITC-Purch WAN Generator SC NM	202002	81,311.10	-	-	-	81,311.10
164	D.0002014.010.001.003	ITC-Purch WAN Generator SC NM	202002	95,363.76	-	-	-	95,363.76

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165						D.0002014.010 Total
166	D.0002015.003.001.002	Purch Satellite HW Sun Ed 1 NM SPS	Electric General	Remington	Enhance Capabilities	D.0002015.003
167	D.0002015.003.001.001	Purch Satellite HW Sanger Switch NM	Electric General	Remington	Enhance Capabilities	D.0002015.003
168						D.0002015.003 Total
169	D.0002014.005.001.002	ITC- WAN Generator Hereford SC TX	Electric General	Remington	Aging Technology	D.0002014.005
170						D.0002014.005 Total
171	D.0001839.371.001.001	Purch SPS Quantar Repeater HW	Electric General	Remington	Aging Technology	D.0001839.371
172						D.0001839.371 Total
173	D.0002014.008.001.002	ITC- Purch WAN Generator Guymon OK	Electric General	Remington	Aging Technology	D.0002014.008
174						D.0002014.008 Total
175	D.0002195.004.001.002	ITC-Purch Storage NTAP HW Amarillo	Electric General	Remington	Aging Technology	D.0002195.004
176						D.0002195.004 Total
177	D.0001839.853.001.002	Purch SCCM HW Lubbock TX	Electric General	Remington	Aging Technology	D.0001839.853
178	D.0001839.853.001.003	Purch SCCM HW Tolk TX	Electric General	Remington	Aging Technology	D.0001839.853
179						D.0001839.853 Total
180	D.0002014.007.001.002	ITC- WAN Generator Plainview SC TX	Electric General	Remington	Aging Technology	D.0002014.007
181						D.0002014.007 Total
182	D.0002014.014.001.001	ITC - WAN Routine HW SPS	Electric General	Remington	Aging Technology	D.0002014.014
183						D.0002014.014 Total
184	D.0002192.004.001.001	ITC-Purch 2019 ITINFS Ref HW SPS	Electric General	Remington	Aging Technology	D.0002192.004
185						D.0002192.004 Total
186	D.0002191.004.001.002	ITC-Purch 2019 EMS Ref HW SPS	Electric General	Remington	Aging Technology	D.0002191.004
187						D.0002191.004 Total
188	D.0002270.004.001.001	ITC - eSOMS HW SPS	Electric General	Remington	Enhance Capabilities	D.0002270.004
189						D.0002270.004 Total
190	D.0002203.008.001.001	ITC-Purch PTT Mobile HW SPS	Electric General	Remington	Aging Technology	D.0002203.008
191						D.0002203.008 Total
192	D.0002355.004.001.001	ITC-Printer Refreshes-Routine HW-SP	Electric General	Remington	Aging Technology	D.0002355.004
193						D.0002355.004 Total
194	D.0002193.008.001.002	ITC-Purch 2019 Printer SPS	Electric General	Remington	Aging Technology	D.0002193.008
195						D.0002193.008 Total
196	D.0002192.017.001.001	ITC - Purch ITINFS Valkyrie HW SPS	Electric General	Remington	Aging Technology	D.0002192.017
197						D.0002192.017 Total
198	D.0002190.004.001.002	ITC-Purch 2019 Handheld Mobile HW S	Electric General	Remington	Aging Technology	D.0002190.004
199						D.0002190.004 Total
200	D.0002194.004.001.002	ITC-Purch Storage Med Nutanix HW SP	Electric General	Remington	Aging Technology	D.0002194.004
201						D.0002194.004 Total
202	D.0001839.840.001.002	Purch Property LAN Canyon TX	Electric General	Remington	Aging Technology	D.0001839.840
203						D.0001839.840 Total
204	D.0002014.006.001.002	ITC- WAN Generator Levelland SC TX	Electric General	Remington	Aging Technology	D.0002014.006
205						D.0002014.006 Total

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	(A)	(G)	(H)	(I)	(J)	(K)	(L)	(M)
Line No.	WBS Level 4 Number	WBS Level 2 Description	In-Service Date	Additions (Jul 2019 - Sep 2020)	XES Charges (Included in Column I)	Other Affiliate Charges (Included in Column I)	Total Affiliate Charges (Included in Column I)	Total Native Charges (Columns I less L) Within the Total Additions to Plant-in-Service Shown in Column (I)
165				176,674.86	-	-	-	176,674.86
166	D.0002015.003.001.002	Purch Satellite HW NM SPS	202008	96,213.45	8,141.25	-	8,141.25	88,072.20
167	D.0002015.003.001.001	Purch Satellite HW NM SPS	202009	93,410.13	4,112.69	-	4,112.69	89,297.44
168				189,623.58	12,253.94	-	12,253.94	177,369.64
169	D.0002014.005.001.002	ITC- WAN Generator Hereford SC TX	202005	46,992.08	-	-	-	46,992.08
170				46,992.08	-	-	-	46,992.08
171	D.0001839.371.001.001	Purch SPS Quantar Repeater HW	201912	9,913,096.07	541,001.41	-	541,001.41	9,372,094.66
172				9,913,096.07	541,001.41	-	541,001.41	9,372,094.66
173	D.0002014.008.001.002	ITC- Purch WAN Generator OK	202004	177.81	-	-	-	177.81
174				177.81	-	-	-	177.81
175	D.0002195.004.001.002	ITC-Purch 2019 Storage HW SPS	201909	25,175.79	4,234.85	-	4,234.85	20,940.94
176				25,175.79	4,234.85	-	4,234.85	20,940.94
177	D.0001839.853.001.002	Purch SCCM HW TX	201904	2,493.85	2,498.83	-	2,498.83	(4.98)
178	D.0001839.853.001.003	Purch SCCM HW TX	201904	(2.54)	-	-	-	(2.54)
179				2,491.31	2,498.83	-	2,498.83	(7.52)
180	D.0002014.007.001.002	ITC- WAN Generator Plainview SC TX	202002	64,213.20	-	-	-	64,213.20
181				64,213.20	-	-	-	64,213.20
182	D.0002014.014.001.001	ITC - WAN Routine HW SPS		466,979.34	446,761.52	-	446,761.52	20,217.82
183				466,979.34	446,761.52	-	446,761.52	20,217.82
184	D.0002192.004.001.001	ITC-Purch 2019 ITINFS Ref HW SPS	201912	2,389,526.01	322,286.72	-	322,286.72	2,067,239.29
185				2,389,526.01	322,286.72	-	322,286.72	2,067,239.29
186	D.0002191.004.001.002	ITC-Purch 2019 EMS Ref HW SPS	202003	28,800.84	5,640.02	-	5,640.02	23,160.82
187				28,800.84	5,640.02	-	5,640.02	23,160.82
188	D.0002270.004.001.001	ITC - eSOMS HW SPS	202002	26,560.71	26,548.91	-	26,548.91	11.80
189				26,560.71	26,548.91	-	26,548.91	11.80
190	D.0002203.008.001.001	ITC-Purch PTT Mobile HW SPS	201912	398,058.64	396,635.29	-	396,635.29	1,423.35
191				398,058.64	396,635.29	-	396,635.29	1,423.35
192	D.0002355.004.001.001	ITC-Printer Refreshes-Routine HW-SP		5,190.55	1,741.40	-	1,741.40	3,449.15
193				5,190.55	1,741.40	-	1,741.40	3,449.15
194	D.0002193.008.001.002	ITC-Purch 2019 Printer SPS	201904	239,517.69	239,418.05	-	239,418.05	99.64
195				239,517.69	239,418.05	-	239,418.05	99.64
196	D.0002192.017.001.001	ITC - Purch ITINFS Valkyrie HW SPS	202003	4,152,825.34	104,480.34	-	104,480.34	4,048,345.00
197				4,152,825.34	104,480.34	-	104,480.34	4,048,345.00
198	D.0002190.004.001.002	ITC-Purch 2019 Handheld Mobile HW S	202002	24,009.13	24,000.00	-	24,000.00	9.13
199				24,009.13	24,000.00	-	24,000.00	9.13
200	D.0002194.004.001.002	ITC-Purch 2019 Plan Server HW SPS	202007	157,738.18	57,388.45	-	57,388.45	100,349.73
201				157,738.18	57,388.45	-	57,388.45	100,349.73
202	D.0001839.840.001.002	Purch Property LAN Canyon TX	201912	(0.01)	-	-	-	(0.01)
203				(0.01)	-	-	-	(0.01)
204	D.0002014.006.001.002	ITC- WAN Generator Levelland SC TX	202004	55,971.47	-	-	-	55,971.47
205				55,971.47	-	-	-	55,971.47

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206	D.0002014.004.001.002	ITC- WAN Generator Borger SC TX	Electric General	Remington	Aging Technology	D.0002014.004
207						D.0002014.004 Total
208			**Total Electric General**			
209	D.0001726.058.001.001	Work and Asset Ph 1 SW SPS	Electric General - Software	Remington	Enhance Capabilities	D.0001726.058
210						D.0001726.058 Total
211	D.0001744.014.001.002	Powerplan Upgrade (Ph 2) SPS Reg Mo	Electric General - Software	Remington	Aging Technology	D.0001744.014
212						D.0001744.014 Total
213	D.0001744.035.001.001	Corporate Giving SW SPS	Electric General - Software	Remington	Enhance Capabilities	D.0001744.035
214						D.0001744.035 Total
215	D.0001770.014.001.001	Secure File&Transfer Ph 2 SW SPS-10	Electric General - Software	Remington	Aging Technology	D.0001770.014
216						D.0001770.014 Total
217	D.0001770.020.001.001	Sec File Ph3 SW SPS-10716	Electric General - Software	Remington	Aging Technology	D.0001770.020
218						D.0001770.020 Total
219	D.0001787.009.001.001	Customer Mgmt SPS	Electric General - Software	Remington	Enhance Capabilities	D.0001787.009
220						D.0001787.009 Total
221	D.0001796.025.001.001	Netwrk Tools Mgmt SW SPS-10700	Electric General - Software	Remington	Enhance Capabilities	D.0001796.025
222						D.0001796.025 Total
223	D.0001804.369.001.001	Integrated Talent Ph4 SWSPS-10637	Electric General - Software	Remington	Enhance Capabilities	D.0001804.369
224						D.0001804.369 Total
225	D.0001826.161.001.001	Verint Suite SW SPS	Electric General - Software	Remington	Aging Technology	D.0001826.161
226						D.0001826.161 Total
227	D.0001826.247.001.001	2015 RPAM Phase 3 Amort SW SPS	Electric General - Software	Remington	Enhance Capabilities	D.0001826.247
228						D.0001826.247 Total
229	D.0001839.851.001.001	RedSky Ph2 SW SPS Direct	Electric General - Software	Remington	Aging Technology	D.0001839.851
230						D.0001839.851 Total
231	D.0002002.007.001.001	NMS 1.12 Upgrade SW SPS-10669	Electric General - Software	Remington	Aging Technology	D.0002002.007
232						D.0002002.007 Total
233	D.0002004.004.001.002	SAP Data Mart SW SPS-10675	Electric General - Software	Remington	Enhance Capabilities	D.0002004.004

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Line No.	**WBS Level 4 Number**	**WBS Level 2 Description**	**In-Service Date**	**Additions (Jul 2019 - Sep 2020)**	**XES Charges (Included in Column I)**	**Other Affiliate Charges (Included in Column I)**	**Total Affiliate Charges (Included in Column I)**	**Total Native Charges (Columns I less L) Within the Total Additions to Plant-in-Service Shown in Column (I)**
206	D.0002014.004.001.002	ITC- WAN Generator Borger SC TX	202002	70,580.87	-	-	-	70,580.87
207				70,580.87	-	-	-	70,580.87
208				**$ 30,895,560.72**	**$ 3,937,658.29**	**$ 948.20**	**$ 3,938,606.49**	**$ 26,956,954.23**
209	D.0001726.058.001.001	Work and Asset Phase 1 SW SPS	201712	$ 1,854.32	$ 1,854.32	$ -	$ 1,854.32	$ -
210				1,854.32	1,854.32	-	1,854.32	-
211	D.0001744.014.001.002	Powerplan Upgrade SW (Ph 2) SP	201703	30.38	(6.08)	-	(6.08)	36.46
212				30.38	(6.08)	-	(6.08)	36.46
213	D.0001744.035.001.001	Corporate Giving SW SPS	201708	162.37	-	-	-	162.37
214				162.37	-	-	-	162.37
215	D.0001770.014.001.001	Secure File&Transfer Ph 2 SW SPS-10	201801	2,495.94	2,495.94	-	2,495.94	-
216				2,495.94	2,495.94	-	2,495.94	-
217	D.0001770.020.001.001	Sec File Ph3 SW SPS-10716	201812	452.59	452.59	-	452.59	-
218				452.59	452.59	-	452.59	-
219	D.0001787.009.001.001	Customer Mgmt SPS	201812	(313,282.94)	(313,282.94)	-	(313,282.94)	-
220				(313,282.94)	(313,282.94)	-	(313,282.94)	-
221	D.0001796.025.001.001	Netwrk Tools Mgmt SW SPS-10700	201812	4,715.22	4,715.22	-	4,715.22	-
222				4,715.22	4,715.22	-	4,715.22	-
223	D.0001804.369.001.001	Integrated Talent Ph4 SWSPS-10637	201703	(36.77)	-	-	-	(36.77)
224				(36.77)	-	-	-	(36.77)
225	D.0001826.161.001.001	Verint Workforce SW SPS	201805	(20.81)	(20.81)	-	(20.81)	-
226				(20.81)	(20.81)	-	(20.81)	-
227	D.0001826.247.001.001	2015 RPAM Phase 3 Amort SW SPS	201810	265.13	265.13	-	265.13	-
228				265.13	265.13	-	265.13	-
229	D.0001839.851.001.001	RedSky Ph2 SW SPS Direct	201812	50.60	-	-	-	50.60
230				50.60	-	-	-	50.60
231	D.0002002.007.001.001	NMS 1.12 Upgrade SW SPS-10669	201811	105.44	105.44	-	105.44	-
232				105.44	105.44	-	105.44	-
233	D.0002004.004.001.002	SAP Data Mart SW SPS-10675	201712	195.14	195.14	-	195.14	-

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Line No.	**WBS Level 4 Number**	**WBS Level 4 Description**	**Asset Class**	**Witness**	**Project Category**	**WBS Level 2 Number**
234						D.0002004.004 Total
235	D.0002034.004.001.001	CEC-TCPA Do Not Call SW SPS-10703	Electric General - Software	Remington	Aging Technology	D.0002034.004
236						D.0002034.004 Total
237	D.0002090.004.001.001	IT Service Request SW SPS-10699	Electric General - Software	Remington	Enhance Capabilities	D.0002090.004
238						D.0002090.004 Total
239	D.0001796.018.001.002	Netwrk Tools Telecom Exp SW TX -106	Electric General - Software	Remington	Aging Technology	D.0001796.018
240						D.0001796.018 Total
241	D.0002090.013.001.001	Microfocus SW SPS-10721	Electric General - Software	Remington	Aging Technology	D.0002090.013
242						D.0002090.013 Total
243	D.0001748.007.001.001	Corp Email SW SPS	Electric General - Software	Remington	Aging Technology	D.0001748.007
244						D.0001748.007 Total
245	D.0001839.186.001.001	Mobile Computing Infra SW SPS	Electric General - Software	Remington	Aging Technology	D.0001839.186
246						D.0001839.186 Total
247	D.0001783.017.001.002	WebSense SW SPS-10670	Electric General - Software	Remington	Aging Technology	D.0001783.017
248						D.0001783.017 Total
249	D.0001792.176.001.001	Rational SW SPS-10715	Electric General - Software	Remington	Aging Technology	D.0001792.176
250						D.0001792.176 Total
251	D.0002003.014.001.001	2019 Oracle SW SPS-10748	Electric General - Software	Remington	Aging Technology	D.0002003.014
252						D.0002003.014 Total
253	D.0002097.007.001.001	UAST Ph1 SW SPS-10689	Electric General - Software	Remington	Enhance Capabilities	D.0002097.007
254						D.0002097.007 Total
255	D.0001839.792.001.002	Websphere SW SPS-10661	Electric General - Software	Remington	Aging Technology	D.0001839.792
256						D.0001839.792 Total
257	D.0002143.004.001.002	Technology Lic SW SPS-10789	Electric General - Software	Remington	Aging Technology	D.0002143.004
258						D.0002143.004 Total
259	D.0002200.006.001.001	ITC-Endpoint Privilege SW SPS-10757	Electric General - Software	Remington	Aging Technology	D.0002200.006
260						D.0002200.006 Total

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	(A)	(G)	(H)	(I)	(J)	(K)	(L)	(M)
Line No.	WBS Level 4 Number	WBS Level 2 Description	In-Service Date	Additions (Jul 2019 - Sep 2020)	XES Charges (Included in Column I)	Other Affiliate Charges (Included in Column I)	Total Affiliate Charges (Included in Column I)	Total Native Charges (Columns I less L) Within the Total Additions to Plant-in-Service Shown in Column (I)
234				195.14	195.14	-	195.14	-
235	D.0002034.004.001.001	CEC-TCPA Do Not Call SW SPS-10703	201812	209.20	209.20	-	209.20	-
236				209.20	209.20	-	209.20	-
237	D.0002090.004.001.001	IT Service Request SW SPS-10699	201812	(1,208.42)	(1,208.42)	-	(1,208.42)	-
238				(1,208.42)	(1,208.42)	-	(1,208.42)	-
239	D.0001796.018.001.002	Netwrk Tools Telecom Exp SW TX -106	201812	161.93	161.93	-	161.93	-
240				161.93	161.93	-	161.93	-
241	D.0002090.013.001.001	Microfocus SW SPS-10721	201811	85.21	85.21	-	85.21	0.00
242				85.21	85.21	-	85.21	0.00
243	D.0001748.007.001.001	Corp Email SW SPS	201612	1,923.19	-	-	-	1,923.19
244				1,923.19	-	-	-	1,923.19
245	D.0001839.186.001.001	Mobile Computing Infra SW SPS	201706	2,980.01	-	-	-	2,980.01
246				2,980.01	-	-	-	2,980.01
247	D.0001783.017.001.002	WebSense SW SPS-10670	201711	(1,520.79)	(1,520.79)	-	(1,520.79)	-
248				(1,520.79)	(1,520.79)	-	(1,520.79)	-
249	D.0001792.176.001.001	Rational SW SPS-10715	201903	(413.44)	(413.44)	-	(413.44)	-
250				(413.44)	(413.44)	-	(413.44)	-
251	D.0002003.014.001.001	2019 Oracle SW SPS-10748	201903	105.70	105.71	-	105.71	(0.01)
252				105.70	105.71	-	105.71	(0.01)
253	D.0002097.007.001.001	UAST Ph1 SW SPS-10689	201903	(0.40)	(0.39)	-	(0.39)	(0.01)
254				(0.40)	(0.39)	-	(0.39)	(0.01)
255	D.0001839.792.001.002	Websphere-BSPRJ000932 SW SPS	201703	5.90	-	-	-	5.90
256				5.90	-	-	-	5.90
257	D.0002143.004.001.002	Technology Lic SW SPS	201909	639,549.32	637,479.13	-	637,479.13	2,070.19
258				639,549.32	637,479.13	-	637,479.13	2,070.19
259	D.0002200.006.001.001	ITC-Endpoint Privilege SW SPS-10757	201912	38,449.23	38,129.08	-	38,129.08	320.15
260				38,449.23	38,129.08	-	38,129.08	320.15

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	(A)	(B)	(C)	(D)	(E)	(F)
Line No.	**WBS Level 4 Number**	**WBS Level 4 Description**	**Asset Class**	**Witness**	**Project Category**	**WBS Level 2 Number**
261	D.0002100.031.001.001	Private Cloud Realize SW SPS-10767	Electric General - Software	Remington	Enhance Capabilities	D.0002100.031
262						D.0002100.031 Total
263	D.0002184.004.001.001	IIB Lic ESB SW SPS-10742	Electric General - Software	Remington	Aging Technology	D.0002184.004
264						D.0002184.004 Total
265	D.0001805.020.001.001	ITC-Pandemic-Next Gen MSFT SW SPS	Electric General - Software	Remington	Aging Technology	D.0001805.020
266						D.0001805.020 Total
267	D.0002135.004.001.001	Unix Config SW SPS-10770	Electric General - Software	Remington	Enhance Capabilities	D.0002135.004
268						D.0002135.004 Total
269	D.0002033.011.001.002	CommodityXL SW SPS-10681	Electric General - Software	Remington	Aging Technology	D.0002033.011
270						D.0002033.011 Total
271	D.0001792.169.001.001	EMAIL SW SPS-10697	Electric General - Software	Remington	Aging Technology	D.0001792.169
272						D.0001792.169 Total
273	D.0002084.027.001.001	Blue Prisim SW SPS-10731	Electric General - Software	Remington	Enhance Capabilities	D.0002084.027
274						D.0002084.027 Total
275	D.0002100.007.001.001	Private Cloud Infra SW SPS-10710	Electric General - Software	Remington	Enhance Capabilities	D.0002100.007
276						D.0002100.007 Total
277	D.0001796.059.001.001	ITC Net Tools LNI SW SPS Direct	Electric General - Software	Remington	Enhance Capabilities	D.0001796.059
278						D.0001796.059 Total
279	11796038	EPM Ph4 Supply Chain SPS	Electric General - Software	Remington	Aging Technology	11795612
280						11795612 Total
281	D.0002166.007.001.001	SUM Total Upgrade SW SPS-10734	Electric General - Software	Remington	Aging Technology	D.0002166.007
282						D.0002166.007 Total
283	D.0002020.004.001.001	SAP Cont Improve SolMan SW SPS-1070	Electric General - Software	Remington	Enhance Capabilities	D.0002020.004
284						D.0002020.004 Total
285	D.0002084.034.001.001	RIS CREV SW SPS-10732	Electric General - Software	Remington	Aging Technology	D.0002084.034
286						D.0002084.034 Total
287	D.0001796.034.001.001	Net Tools CISCO SW SPS-10718	Electric General - Software	Remington	Enhance Capabilities	D.0001796.034

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	(A)	(G)	(H)	(I)	(J)	(K)	(L)	(M)
Line No.	**WBS Level 4 Number**	**WBS Level 2 Description**	**In-Service Date**	**Additions (Jul 2019 - Sep 2020)**	**XES Charges (Included in Column I)**	**Other Affiliate Charges (Included in Column I)**	**Total Affiliate Charges (Included in Column I)**	**Total Native Charges (Columns I less L) Within the Total Additions to Plant-in-Service Shown in Column (I)**
261	D.0002100.031.001.001	Private Cloud Realize SW SPS-10767	201912	82,175.34	54,533.64	-	54,533.64	27,641.70
262				82,175.34	54,533.64	-	54,533.64	27,641.70
263	D.0002184.004.001.001	IIB Lic ESB SW SPS-10742	201910	424,639.74	68,236.20	-	68,236.20	356,403.54
264				424,639.74	68,236.20	-	68,236.20	356,403.54
265	D.0001805.020.001.001	ITC-Pandemic-Next Gen MSFT SW SPS	202008	270,539.03	269,993.44	-	269,993.44	545.59
266				270,539.03	269,993.44	-	269,993.44	545.59
267	D.0002135.004.001.001	Unix Config SW SPS-10770	201912	207,815.42	202,905.97	-	202,905.97	4,909.45
268				207,815.42	202,905.97	-	202,905.97	4,909.45
269	D.0002033.011.001.002	CommodityXL SW SPS -10681	201905	3,248.62	3,248.71	-	3,248.71	(0.09)
270				3,248.62	3,248.71	-	3,248.71	(0.09)
271	D.0001792.169.001.001	EMAIL SW SPS-10697	201910	32,314.95	520.53	-	520.53	31,794.42
272				32,314.95	520.53	-	520.53	31,794.42
273	D.0002084.027.001.001	Blue Prisim SW SPS-10731	201904	(48.60)	(48.58)	-	(48.58)	(0.02)
274				(48.60)	(48.58)	-	(48.58)	(0.02)
275	D.0002100.007.001.001	Private Cloud Infra SW SPS-10710	201904	2,180.85	2,180.86	-	2,180.86	(0.01)
276				2,180.85	2,180.86	-	2,180.86	(0.01)
277	D.0001796.059.001.001	ITC Net Tools LNI SW SPS Direct	201908	5,367.45	-	-	-	5,367.45
278				5,367.45	-	-	-	5,367.45
279	11796038	EPM Ph4 Supply Chain SPS	201501	(0.02)	-	-	-	(0.02)
280				(0.02)	-	-	-	(0.02)
281	D.0002166.007.001.001	SUM Total Upgrade SW SPS-10734	202001	52,673.29	38,991.04	-	38,991.04	13,682.25
282				52,673.29	38,991.04	-	38,991.04	13,682.25
283	D.0002020.004.001.001	SAP Cont Improve SolMan SW SPS-1070	201912	173,087.00	15,142.15	-	15,142.15	157,944.85
284				173,087.00	15,142.15	-	15,142.15	157,944.85
285	D.0002084.034.001.001	RIS CREV SW SPS-10732	201909	32,964.94	6,421.08	-	6,421.08	26,543.86
286				32,964.94	6,421.08	-	6,421.08	26,543.86
287	D.0001796.034.001.001	Net Tools CISCO SW SPS-10718	201911	223,541.54	69,891.27	-	69,891.27	153,650.27

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	(A)	(B)	(C)	(D)	(E)	(F)
Line No.	**WBS Level 4 Number**	**WBS Level 4 Description**	**Asset Class**	**Witness**	**Project Category**	**WBS Level 2 Number**
288						D.0001796.034 Total
289	D.0002045.015.001.001	Operation Monitor SW SPS-10728	Electric General - Software	Remington	Enhance Capabilities	D.0002045.015
290						D.0002045.015 Total
291	D.0001805.016.001.001	Next Gen MSFT Deploy SW SPS -10693	Electric General - Software	Remington	Aging Technology	D.0001805.016
292						D.0001805.016 Total
293	D.0002243.005.001.001	Settlement Tracker Elim SW SPS-1077	Electric General - Software	Remington	Enhance Capabilities	D.0002243.005
294						D.0002243.005 Total
295	D.0002043.004.001.001	Enterprise Learning Upgrade SW SPS-	Electric General - Software	Remington	Aging Technology	D.0002043.004
296						D.0002043.004 Total
297	D.0002072.004.001.001	Replace Meeting Planner SW SPS-1073	Electric General - Software	Remington	Aging Technology	D.0002072.004
298						D.0002072.004 Total
299	D.0002282.004.001.001	ITC-Mainframe Modernization-SW SPS	Electric General - Software	Remington	Aging Technology	D.0002282.004
300						D.0002282.004 Total
301	D.0001839.628.001.001	ESB Environment SW SPS-10646	Electric General - Software	Remington	Enhance Capabilities	D.0001839.628
302						D.0001839.628 Total
303	D.0002368.004.001.001	ITC-Propensity to Pay SW 200171 SPS	Electric General - Software	Remington	Enhance Capabilities	D.0002368.004
304						D.0002368.004 Total
305	D.0002168.006.001.001	ESRI Landworks SW SPS-10735	Electric General - Software	Remington	Aging Technology	D.0002168.006
306						D.0002168.006 Total
307	D.0002244.001.001.001	ITC-PCI SPP Settlement SW SPS	Electric General - Software	Remington	Aging Technology	D.0002244.001
308						D.0002244.001 Total
309	D.0001796.045.001.001	Net Tools-Solar Wind SW SPS 10736	Electric General - Software	Remington	Enhance Capabilities	D.0001796.045
310						D.0001796.045 Total
311	D.0001723.048.001.001	ADMS Data - SPS	Electric General - Software	Remington	AGIS	D.0001723.048
312						D.0001723.048 Total
313	D.0002068.010.001.001	ITC-Powerplan Upg Phase1b-SW-SPS	Electric General - Software	Remington	Aging Technology	D.0002068.010
314						D.0002068.010 Total

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	(A)	(G)	(H)	(I)	(J)	(K)	(L)	(M)
Line No.	**WBS Level 4 Number**	**WBS Level 2 Description**	**In-Service Date**	**Additions (Jul 2019 - Sep 2020)**	**XES Charges (Included in Column I)**	**Other Affiliate Charges (Included in Column I)**	**Total Affiliate Charges (Included in Column I)**	**Total Native Charges (Columns I less L) Within the Total Additions to Plant-in-Service Shown in Column (I)**
288				223,541.54	69,891.27	-	69,891.27	153,650.27
289	D.0002045.015.001.001	Operation Monitor SW SPS-10728	201912	315,369.18	74,654.09	-	74,654.09	240,715.09
290				315,369.18	74,654.09	-	74,654.09	240,715.09
291	D.0001805.016.001.001	Next Gen MSFT Deploy SW SPS -10693	201912	2,124,181.98	1,026,612.39	-	1,026,612.39	1,097,569.59
292				2,124,181.98	1,026,612.39	-	1,026,612.39	1,097,569.59
293	D.0002243.005.001.001	Settlement Tracker Elim SW SPS-1077	201911	62,796.62	59,356.61	-	59,356.61	3,440.01
294				62,796.62	59,356.61	-	59,356.61	3,440.01
295	D.0002043.004.001.001	Enterprise Learning Upgrade SW SPS1	201908	290,214.28	37,978.01	-	37,978.01	252,236.27
296				290,214.28	37,978.01	-	37,978.01	252,236.27
297	D.0002072.004.001.001	Replace Meeting Planner SW SPS-1073	201912	68,197.12	27,438.72	-	27,438.72	40,758.40
298				68,197.12	27,438.72	-	27,438.72	40,758.40
299	D.0002282.004.001.001	ITC-Mainframe Modernization-SW SPS	202003	262,391.90	258,186.89	-	258,186.89	4,205.01
300				262,391.90	258,186.89	-	258,186.89	4,205.01
301	D.0001839.628.001.001	ESB Environment SW SPS-10646	201912	2,192,834.14	818,131.52	-	818,131.52	1,374,702.62
302				2,192,834.14	818,131.52	-	818,131.52	1,374,702.62
303	D.0002368.004.001.001	ITC-Propensity to Pay SW 200171 SPS	202008	23,752.41	23,655.50	-	23,655.50	96.91
304				23,752.41	23,655.50	-	23,655.50	96.91
305	D.0002168.006.001.001	ESRI Landworks SW SPS-10735	201907	56,719.93	4,723.16	-	4,723.16	51,996.77
306				56,719.93	4,723.16	-	4,723.16	51,996.77
307	D.0002244.001.001.001	ITC-PCI SPP Settlement SW SPS	202002	458,618.88	452,247.48	-	452,247.48	6,371.40
308				458,618.88	452,247.48	-	452,247.48	6,371.40
309	D.0001796.045.001.001	Net Tools-Solar Wind SW SPS 10736	201911	66,602.26	14,528.78	-	14,528.78	52,073.48
310				66,602.26	14,528.78	-	14,528.78	52,073.48
311	D.0001723.048.001.001	ADMS Data - SPS	201912	1,078,669.02	5,674.61	-	5,674.61	1,072,994.41
312				1,078,669.02	5,674.61	-	5,674.61	1,072,994.41
313	D.0002068.010.001.001	ITC-Powerplan Upg Phase1b-SW-SPS	202009	18,175.29	17,986.49	-	17,986.49	188.80
314				18,175.29	17,986.49	-	17,986.49	188.80

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	(A)	(B)	(C)	(D)	(E)	(F)
Line No.	**WBS Level 4 Number**	**WBS Level 4 Description**	**Asset Class**	**Witness**	**Project Category**	**WBS Level 2 Number**
315	D.0001796.014.001.002	Netwrk Tools LNI Smallworld SW TX -	Electric General - Software	Remington	Aging Technology	D.0001796.014
316						D.0001796.014 Total
317	D.0002290.004.001.001	ITC-Field Collect Sys Upg-SW SPS	Electric General - Software	Remington	Aging Technology	D.0002290.004
318						D.0002290.004 Total
319	D.0002295.004.001.001	ITC-FME Upgrade- SW SPS	Electric General - Software	Remington	Aging Technology	D.0002295.004
320						D.0002295.004 Total
321	D.0002081.011.001.001	VMCM SW SPS-10714	Electric General - Software	Remington	Aging Technology	D.0002081.011
322						D.0002081.011 Total
323	D.0001796.050.001.001	Net Tools Infovista SW SPS-10755	Electric General - Software	Remington	Enhance Capabilities	D.0001796.050
324						D.0001796.050 Total
325	D.0002287.004.001.002	ITC - EasyPower Lic Purchase SW SPS	Electric General - Software	Remington	Aging Technology	D.0002287.004
326						D.0002287.004 Total
327	D.0002274.004.001.001	2019 Advertising & Brand Content Li	Electric General - Software	Remington	Enhance Capabilities	D.0002274.004
328						D.0002274.004 Total
329	D.0002252.006.001.001	ITC-Strategist Replacement SW TX -	Electric General - Software	Remington	Aging Technology	D.0002252.006
330						D.0002252.006 Total
331	D.0002100.014.001.001	Private Cloud Service SW SPS-10711	Electric General - Software	Remington	Enhance Capabilities	D.0002100.014
332						D.0002100.014 Total
333	D.0002068.004.001.001	ITC-Powerplan Upgrade SW SPS-10768	Electric General - Software	Remington	Aging Technology	D.0002068.004
334						D.0002068.004 Total
335	D.0001804.393.001.001	ESOM Ph2 SW SPS-10687	Electric General - Software	Remington	Enhance Capabilities	D.0001804.393
336						D.0001804.393 Total
337	D.0001787.021.001.001	ITC-BS-WS 19 SW Releases - TX 10792	Electric General - Software	Remington	Enhance Capabilities	D.0001787.021
338						D.0001787.021 Total
339	D.0001728.007.001.001	Sub Asset Mgmt SW SPS	Electric General - Software	Remington	Enhance Capabilities	D.0001728.007
340						D.0001728.007 Total
341	D.0002364.006.001.001	ITC-BS Resiliency SW 200074 SPS	Electric General - Software	Remington	Enhance Capabilities	D.0002364.006

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	(A)	(G)	(H)	(I)	(J)	(K)	(L)	(M)
Line No.	**WBS Level 4 Number**	**WBS Level 2 Description**	**In-Service Date**	**Additions (Jul 2019 - Sep 2020)**	**XES Charges (Included in Column I)**	**Other Affiliate Charges (Included in Column I)**	**Total Affiliate Charges (Included in Column I)**	**Total Native Charges (Columns I less L) Within the Total Additions to Plant-in-Service Shown in Column (I)**
315	D.0001796.014.001.002	Netwrk Tools LNI Smallworld SW TX -	201906	(10,726.73)	(10,727.36)	-	(10,727.36)	0.63
316				(10,726.73)	(10,727.36)	-	(10,727.36)	0.63
317	D.0002290.004.001.001	ITC-Field Collect Sys Upg-SW SPS	202008	19,867.64	19,691.29	-	19,691.29	176.35
318				19,867.64	19,691.29	-	19,691.29	176.35
319	D.0002295.004.001.001	ITC-FME Upgrade- SW SPS	202008	20,658.82	20,348.66	-	20,348.66	310.16
320				20,658.82	20,348.66	-	20,348.66	310.16
321	D.0002081.011.001.001	VMCM SW SPS-10714	201911	581,688.85	208,768.75	-	208,768.75	372,920.10
322				581,688.85	208,768.75	-	208,768.75	372,920.10
323	D.0001796.050.001.001	Net Tools Infovista SW SPS-10755	201911	29,691.63	28,837.02	-	28,837.02	854.61
324				29,691.63	28,837.02	-	28,837.02	854.61
325	D.0002287.004.001.002	ITC - EasyPower Lic Purchase SW SPS	202003	13,660.62	13,660.62	-	13,660.62	-
326				13,660.62	13,660.62	-	13,660.62	-
327	D.0002274.004.001.001	2019 Advertising & Brand Content Li	202007	115,498.71	-	-	-	115,498.71
328				115,498.71	-	-	-	115,498.71
329	D.0002252.006.001.001	ITC-Strategist Replacement SW TX -	201912	82,732.71	81,936.14	-	81,936.14	796.57
330				82,732.71	81,936.14	-	81,936.14	796.57
331	D.0002100.014.001.001	Private Cloud Service SW SPS-10711	201904	(1,313.20)	-	-	-	(1,313.20)
332				(1,313.20)	-	-	-	(1,313.20)
333	D.0002068.004.001.001	ITC-Powerplan Upgrade SW SPS-10768	201910	210,004.15	124,809.17	-	124,809.17	85,194.98
334				210,004.15	124,809.17	-	124,809.17	85,194.98
335	D.0001804.393.001.001	ESOM Ph2 SW SPS-10687	201911	788,078.07	64,720.41	-	64,720.41	723,357.66
336				788,078.07	64,720.41	-	64,720.41	723,357.66
337	D.0001787.021.001.001	ITC-BS-WS 19 SW Releases - TX 10792	201912	443,481.76	440,835.81	-	440,835.81	2,645.95
338				443,481.76	440,835.81	-	440,835.81	2,645.95
339	D.0001728.007.001.001	Sub Asset Mgmt SW SPS	201912	793,095.20	140,253.12	-	140,253.12	652,842.08
340				793,095.20	140,253.12	-	140,253.12	652,842.08
341	D.0002364.006.001.001	ITC-BS Resiliency SW 200074 SPS	202009	400,386.10	395,618.13	-	395,618.13	4,767.97

Southwestern Public Service Company

Business Systems Capital Additions
July 1, 2019 through September 30, 2020

	(A)	(B)	(C)	(D)	(E)	(F)
Line No.	**WBS Level 4 Number**	**WBS Level 4 Description**	**Asset Class**	**Witness**	**Project Category**	**WBS Level 2 Number**
342						D.0002364.006 Total
343	D.0002205.006.001.001	Cust Mobile App SW SPS-10765	Electric General - Software	Remington	Enhance Capabilities	D.0002205.006
344						D.0002205.006 Total
345	D.0002307.004.001.001	ITC-Unifier PPM Tool-SW-SPS	Electric General - Software	Remington	Aging Technology	D.0002307.004
346						D.0002307.004 Total
347	D.0002245.006.001.001	AutoSys Ref SW SPS-10776	Electric General - Software	Remington	Aging Technology	D.0002245.006
348						D.0002245.006 Total
349	D.0001787.014.001.001	SAP S&O SW Rel 19 SPS-10733	Electric General - Software	Remington	Enhance Capabilities	D.0001787.014
350						D.0001787.014 Total
351	D.0002265.004.001.001	ITC - 2020 Oracle Licenses SW - TX	Electric General - Software	Remington	Aging Technology	D.0002265.004
352						D.0002265.004 Total
353	D.0002279.004.001.001	ITC - Upg Pro, Visio, & Adobe Pro S	Electric General - Software	Remington	Aging Technology	D.0002279.004
354						D.0002279.004 Total
355	D.0002185.006.001.001	Net Auto Platform SW SPS-10741	Electric General - Software	Remington	Enhance Capabilities	D.0002185.006
356						D.0002185.006 Total
357	D.0002369.004.001.001	ITC-Blue Prism Licenses SW 200074 S	Electric General - Software	Remington	Aging Technology	D.0002369.004
358						D.0002369.004 Total
359			**Total Electric General - Software**			
360			**Grand Total**			

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July 1, 2019 through September 30, 2020

	(A)	(G)	(H)	(I)	(J)	(K)	(L)	(M)
Line No.	**WBS Level 4 Number**	**WBS Level 2 Description**	**In-Service Date**	**Additions (Jul 2019 - Sep 2020)**	**XES Charges (Included in Column I)**	**Other Affiliate Charges (Included in Column I)**	**Total Affiliate Charges (Included in Column I)**	**Total Native Charges (Columns I less L) Within the Total Additions to Plant-in-Service Shown in Column (I)**
342				400,386.10	395,618.13	-	395,618.13	4,767.97
343	D.0002205.006.001.001	Cust Mobile App SW SPS-10765	202003	13,983.19	6,670.83	-	6,670.83	7,312.36
344				13,983.19	6,670.83	-	6,670.83	7,312.36
345	D.0002307.004.001.001	ITC-Unifier PPM Tool-SW-SPS	202009	59,335.90	58,734.94	-	58,734.94	600.96
346				59,335.90	58,734.94	-	58,734.94	600.96
347	D.0002245.006.001.001	AutoSys Ref SW SPS-10776	202009	63,148.22	60,827.30	-	60,827.30	2,320.92
348				63,148.22	60,827.30	-	60,827.30	2,320.92
349	D.0001787.014.001.001	SAP S&O SW Rel 19 SPS-10733	201909	2,348,311.04	1,122,305.61	-	1,122,305.61	1,226,005.43
350				2,348,311.04	1,122,305.61	-	1,122,305.61	1,226,005.43
351	D.0002265.004.001.001	ITC - 2020 Oracle Licenses SW - TX	202003	487,413.48	484,788.17	-	484,788.17	2,625.31
352				487,413.48	484,788.17	-	484,788.17	2,625.31
353	D.0002279.004.001.001	ITC - Upg Pro, Visio, & Adobe Pro S	201912	438,048.28	437,450.88	-	437,450.88	597.40
354				438,048.28	437,450.88	-	437,450.88	597.40
355	D.0002185.006.001.001	Net Auto Platform SW SPS-10741	202001	343,591.47	127,198.90	-	127,198.90	216,392.57
356				343,591.47	127,198.90	-	127,198.90	216,392.57
357	D.0002369.004.001.001	ITC-Blue Prism Licenses SW 200074 S	202008	27,707.62	27,558.40	-	27,558.40	149.22
358				27,707.62	27,558.40	-	27,558.40	149.22
359				**$ 16,174,679.34**	**$ 7,777,278.52**	**$ -**	**$ 7,777,278.52**	**$ 8,397,400.82**
360				**$ 47,070,240.06**	**$ 11,714,936.81**	**$ 948.20**	**$ 11,715,885.01**	**$ 35,354,355.05**

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Business Systems Capital Additions
October 1, 2020 through December 31, 2020

	(A)	(B)	(C)	(D)	(E)	(F)
Line No.	**Asset Class**	**Witness**	**Project Category**	**Additions to Plant-in-Service (Oct. 2020 - Dec. 2020)**	**Total Affiliate Charges (Included in Column D)**	**Project Description**
				October-December 2020 Budget Amounts		
1	Electric General - Software	Remington	AGIS	$ 992,709.14		The Planning and Forecasting tool is a new tool that will enable SPS to efficiently expand its distribution planning capabilities to incorporate distribution energy resources ("DER"), enhance its load forecasting capabilities, and better integrate and align with other SPS planning tools and processes. SPS's distribution planning team will utilize this new capability to study various forecasts and DER adoption scenarios resulting in improved distribution plans.
2	Electric General - Software	Remington	AGIS	719,086.01		The Advanced Distribution Management System ("ADMS") provides an integrated operating and decision software support system to assist control room, field personnel, and engineers with the monitoring, control, and optimization of the electric distribution system. This ADMS data project involved collecting and reviewing information about the electric distribution assets to ensure that the information available complies with the necessary level of detail needed for ADMS.
3	Electric General - Software	Remington	Aging Technology	595,029.27		The project will provide a broad support for numerous types of integrations performed by overlapping technologies today enabling a robust digital transformation.
4	Electric General - Software	Remington	Enhance Capabilities	543,934.98		This project involves implementing an on-line, thermal monitoring program using plant operational data gathered via the OSiSoft Process Information (data platform) and other systems. It will transition Xcel Energy from a time-based maintenance program to a condition-based maintenance program.
5	Electric General - Software	Remington	Enhance Capabilities	514,977.39		The project involves deploying an application performance monitoring tool to improve visibility into issues affecting critical customer-impacting applications and provide insight into root causes.
6	Electric General - Software	Remington	Aging Technology	488,179.21		This project will upgrade legacy Meridium to the latest version, as the prior version is outdated. This initiative will provide performance improvements which will allow Xcel to optimize asset decision making and spending.
7	Electric General - Software	Remington	Enhance Capabilities	467,856.01		This project will provide a new digital presence for our customer channels, improving optionality, providing more user-friendly interfaces, and offering more capabilities for customer data management.

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	(A)	(B)	(C)	(D)	(E)	(F)
Line No.	**Asset Class**	**Witness**	**Project Category**	**Additions to Plant-in-Service (Oct. 2020 - Dec. 2020)**	**Total Affiliate Charges (Included in Column D)**	**Project Description**
8	Electric General - Software	Remington	Aging Technology	403,788.11		This project involves the replacement of the Microsoft Active Directory infrastructure at 28 sites across Xcel Energy, as well as an upgrade of the Active Directory software to the most recent version. Active Directory authenticates and authorizes users and computers in a Microsoft Windows domain. It also assigns and enforces security policies for all computers that are members of the domain.
9	Electric General - Software	Remington	Aging Technology	379,035.57		This project involves replacing the hosted Emptoris application due to vendor IBM ending support in 2020. Emptoris is the Supply Chain organization's application for creating contracts with suppliers and sending requests for proposal to suppliers.
10	Electric General - Software	Remington	Aging Technology	365,281.60		To project ensures adequate coverage, the Company will purchase additional licenses to support new and increasing numbers of licenses for common systems, such as Microsoft and Oracle, with users usually not tied to specific projects. Prior year true ups were completed for Microsoft and Oracle. Updating software licenses ensures that system devices are not over purchased and are running up-to-date licensed software, which decreases support costs and increases the Company's cyber security profile.
11	Electric General - Software	Remington	AGIS	336,540.02		The Advanced Distribution Management System ("ADMS") provides an integrated operating and decision software support system to assist control room, field personnel, and engineers with the monitoring, control, and optimization of the electric distribution system. This ADMS data project involved collecting and reviewing information about the electric distribution assets to ensure that the information available complies with the necessary level of detail needed for ADMS.
12	Electric General - Software	Remington	Enhance Capabilities	335,300.52		This project includes costs for preparing to change network services vendors. It includes auditing telecom invoices and processing invoice payments, and managing the provisioning and full installation of new network circuits, transferring third-party treasury service to the new vendor, and migrating asset management to the corporate IT Service Management processes and tools.

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	(A)	(B)	(C)	(D)	(E)	(F)
Line No.	**Asset Class**	**Witness**	**Project Category**	**Additions to Plant-in-Service (Oct. 2020 - Dec. 2020)**	**Total Affiliate Charges (Included in Column D)**	**Project Description**
13	Electric General - Software	Remington	Enhance Capabilities	298,678.05		The project is continued investment in reporting to meet the landscape is necesary in order to provide a stable and consistent platform for the business while providing innovations at an increased pace, without disruption, all while reducing the total cost of ownership and total cost of operations.
14	Electric General - Software	Remington	Enhance Capabilities	293,150.30		This project involves identifying and implementing a software asset management solution to support compliance with vendor agreements, minimize maintenance costs, streamline application life cycle, and improve cyber risk posture through effective patching and access management.
15	Electric General - Software	Remington	Aging Technology	288,932.29		This project refreshes the Customer Response System ("CRS") technical stack with current, supported versions of Oracle, AIX, Internet Explorer, Windows, Genero, Weblogic, Perl, and Java, to ensure a fully supported and healthy customer information system.
16	Electric General - Software	Remington	Enhance Capabilities	270,512.58		This project involves the development and implementation of a digital/technology solution to support distribution scheduling.
17	Electric General - Software	Remington	Aging Technology	265,050.00		This project involves the purchase of Rational licenses. IBM's Rational tool facilitates software application development, testing, and defect tracking. The tool is used by Business Systems and technology vendors to deliver software solutions to Xcel Energy.
18	Electric General - Software	Remington	Aging Technology	221,377.73		This project involves costs associated with a prepaid purchase of Oracle Java licenses; Java is a software platform (as well as programming language) that allows for application software development and deployment.
19	Electric General - Software	Remington	Enhance Capabilities	211,810.55		This project involves implementing an integrated document management solution for legal services to manage content related to legal matters.
20	Electric General - Software	Remington	Enhance Capabilities	205,302.09		This project involves implementing a software tool that will help address the challenges with data discovery, compliance activities, and storage optimization.
21	Electric General - Software	Remington	Enhance Capabilities	173,599.84		This project uses the Blue Prism platform to develop software bots which automatically execute routine tasks and processes that are currently performed manually by departments across the company. These bots deliver value by automatically executing routine, non-value-add tasks consistently, accurately, quickly and reliably, which frees up time for employees to focus on value-add activities.

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	(A)	(B)	(C)	(D)	(E)	(F)
Line No.	**Asset Class**	**Witness**	**Project Category**	**Additions to Plant-in-Service (Oct. 2020 - Dec. 2020)**	**Total Affiliate Charges (Included in Column D)**	**Project Description**
22	Electric General - Software	Remington	Aging Technology	136,661.51		This project will upgrade the company's request portal, XpressREQUEST, to the latest version of the portal from MicroFocus. This includes end-user training and change management. This project also is expected to require hardware changes.
23	Electric General - Software	Remington	Enhance Capabilities	134,733.25		This project will implementing new collaboration technology and standardize all conference rooms with a small, medium, large, and bay configuration.
24	Electric General - Software	Remington	Aging Technology	121,979.45		This project will build additional business functions into the RSA Archer toolset for compliance areas such as SOX, Gas Compliance, and Corporate Compliance.
25	Electric General - Software	Remington	Aging Technology	109,447.26		This project will replace the existing legal hold software ALH/Liquid Office. It will implement a new software that will capture legal matters and custodians, generate email workflow communications, store workflow event information and responses, and produce reports for statistics by matter/custodian.
26	Electric General - Software	Remington	Aging Technology	86,463.03		This project will remediate Flash for the applications identified using this outdated Adobe technology so they will continue to function correctly.
27	Electric General - Software	Remington	Enhance Capabilities	84,677.84		This project allows for real-time gas flow monitoring & windfarm forecast, which will provide for better gas supply reliability by producing a rolling real time reserve margin that will be monitored hourly.
28	Electric General - Software	Remington	Enhance Capabilities	84,246.96		The project will allow access customers to use Virtual Personal Assistants, Smart Speakers (Google Home, Amazon Echo), and Smart Displays (Google Home Hub).
29	Electric General - Software	Remington	Enhance Capabilities	77,986.77		The project is necesary in order to provide a stable and consistent platform for the business to use PTT while providing innovations at an increased pace, without disruption, all while reducing the total cost of ownership and total cost of operations.
30	Electric General - Software	Remington	Aging Technology	74,976.47		This project will build additional business functions into the RSA Archer toolset for compliance areas such as SOX, Gas Compliance, and Corporate Compliance.

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	(A)	(B)	(C)	(D)	(E)	(F)
Line No.	**Asset Class**	**Witness**	**Project Category**	**Additions to Plant-in-Service (Oct. 2020 - Dec. 2020)**	**Total Affiliate Charges (Included in Column D)**	**Project Description**
31	Electric General - Software	Remington	Aging Technology	73,293.64		The project will implement an enterprise-wide Archive/Purge solution using Informatica to streamline and standardize the archival, retention, and disposal of structured data across the enterprise.
32	Electric General - Software	Remington	Enhance Capabilities	68,674.24		This project is for the building of data science models, which includes base data set building, modeling, data scrubbing, and upgrading data sets. As part of Xcel Enterprise Data strategy, we need to optimize the value from our data. The Enterprise Data Science team is working across initiatives to leverage data to build predictive models and algorithms that have aided in increased participation in DSM programs and better target marketing.
33	Electric General - Software	Remington	Aging Technology	65,426.94		Adobe Flash will be discontinued December 31, 2020, and browsers currently supporting Flash will drop support as well. This project will remediate Flash for the applications identified using this technology so they will continue to function correctly.
34	Electric General - Software	Remington	Aging Technology	57,006.23		This project entails the upgrade of aging analog radio systems to digital. These replacements and upgrades will complete the migration of Xcel's aging analog radio systems to the P25 digital standard and upgrade other system components that will be going out of support over this time period. Once completed, the Minnesota Metro radio will be a system on a common digital platform with system cores that integrate sub-systems into a reliable, supportable digital network.
35	Electric General - Software	Remington	Aging Technology	35,544.65		Adobe Flash will be discontinued December 31, 2020, and browsers currently supporting Flash will drop support as well. This project will remediate Flash for the applications identified using this technology so they will continue to function correctly.
36	Electric General - Software	Remington	Aging Technology	29,872.73		The project is an annual refresh and replaces aged printing devices.

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	(A)	(B)	(C)	(D)	(E)	(F)
Line No.	**Asset Class**	**Witness**	**Project Category**	**Additions to Plant-in-Service (Oct. 2020 - Dec. 2020)**	**Total Affiliate Charges (Included in Column D)**	**Project Description**
37	Electric General - Software	Remington	Aging Technology	29,640.00		This project involved purchasing the licenses necessary to move desktop and mobile computing devices throughout Xcel Energy to the most current operating system, Windows 10, and to move from the Office 2010 suite of applications to Office 365. The legacy operating system was near the end of its useful life, and vendor support ended in January 2020. A current, supported operating system is essential for avoiding security vulnerabilities and enables new business capabilities and efficiencies, such as mobile and tablet technologies across our business.
38	Electric General - Software	Remington	Aging Technology	23,181.91		This project is intended to upgrade Unifier to the latest self-hosted version thus bringing Xcel Energy back into Vendor support, re-enabling the Udesigner Editing tool to work again, and removing of Java vulnerabilities.
39	Electric General - Software	Remington	Aging Technology	22,655.38		Replace Labtrac software with Watt Net Express software and upgrade test board hardware to be compatible with new software.
40	Electric General - Software	Remington	Enhance Capabilities	16,392.89		The project will upgrade the Builders Call Line with a Builders Portal (BP) that will allow external builder to apply for new service requests. The BP will provide a means for the builder to log in, complete the require forms and view the status of requests.
41	Electric General - Software	Remington	Aging Technology	14,477.81		The project upgrade Forefront Identity Manager (FIM) will update Microsoft Identity Manager to stay current with Microsoft support and maintain compatibility with other critical applications. FIM supports multiple priority interfaces across the enterprise including HR Authenticator, CRS Password Lookup, SailPoint, PeopleSoft, and SAP Minimaster.
42	Electric General - Software	Remington	Enhance Capabilities	11,412.75		The project (Customer Identity Access Management) is a toolset needed to establish single sign-on capabilities for Xcel Energy customers across multiple channels.
43	Electric General - Software	Remington	Aging Technology	7,282.00		This project is to replace the existing mainframe with a solution that meet the needs of Xcel Energy.
44	Electric General - Software	Remington	Aging Technology	6,702.31		The refresh project wil lexpand and improve our aging Virtual Desktop Interface (VDI) environment. Architect solution to implement best practices for VDI environment and management.

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	(A)	(B)	(C)	(D)	(E)	(F)
Line No.	**Asset Class**	**Witness**	**Project Category**	**Additions to Plant-in-Service (Oct. 2020 - Dec. 2020)**	**Total Affiliate Charges (Included in Column D)**	**Project Description**
45	Electric General - Software	Remington	Aging Technology	4,733.23		To ensure adequate coverage, the Company will purchase additional licenses to support new and increasing numbers of licenses for common systems, such as Microsoft and Oracle, with users usually not tied to specific projects. Prior year true ups were completed for Microsoft and Oracle. Updating software licenses ensures that system devices are not over purchased and are running up-to-date licensed software, which decreases support costs and increases the Company's cyber security profile.
46	Electric General - Software	Remington	Aging Technology	4,218.07		Adobe Flash will be discontinued December 31, 2020, and browsers currently supporting Flash will drop support as well. This program will remediate Flash for the applications identified using this technology so they will continue to function correctly.
47	Electric General - Software	Remington	Aging Technology	2,458.00		Install Field Collection System 4.X or higher onto the network to support the continued operations of the meter reading teams.
48	Electric General - Software	Remington	Enhance Capabilities	2,362.00		This project built on the Customer Response System and other key domain critical areas across Xcel Energy. It included gaining an understanding of incident root causes and defined improvement opportunities and initial sequencing/roadmap to drive increased stability and resiliency in the future.
49	Electric General - Software	Remington	Aging Technology	2,077.00		Upgrade the PowerPlan application to the latest release to enable and incorporate new functionality.
50	Electric General - Software	Remington	Aging Technology	1,861.61		Adobe Flash will be discontinued December 31, 2020, and browsers currently supporting Flash will drop support as well. This program will remediate Flash for the applications identified using this technology so they will continue to function correctly.
51	Electric General - Software	Remington	Aging Technology	643.93		Adobe Flash will be discontinued December 31, 2020, and browsers currently supporting Flash will drop support as well. This program will remediate Flash for the applications identified using this technology so they will continue to function correctly.

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	(A)	(B)	(C)	(D)	(E)	(F)
Line No.	**Asset Class**	**Witness**	**Project Category**	**Additions to Plant-in-Service (Oct. 2020 - Dec. 2020)**	**Total Affiliate Charges (Included in Column D)**	**Project Description**
52	Electric General - Software	Remington	Aging Technology	482.78		The RiskMaster application will be upgraded; it is used by Finance to manage insurance claims for both property loss and workers' compensation. Based on a recent health assessment, the application and related technologies are out of support, not compatible with Windows 10, and identified security vulnerabilities. The application contains both Confidential and Confidential Restricted, data making it critical to minimize all cyber and data vulnerabilities.
53	Electric General - Software	Remington	Aging Technology	410.30		Adobe Flash will be discontinued December 31, 2020, and browsers currently supporting Flash will drop support as well. This program will remediate Flash for the applications identified using this technology so they will continue to function correctly.
54	Electric General - Software	Remington	Aging Technology	29.02		Upgrade the PowerPlan application to the latest release to enable and incorporate new functionality.
55	Electric General - Software	Remington	Enhance Capabilities	11.51		This program involves redesigning our Contact Center for customers. Specifically, natural language processing will be inputted into the Interactive Voice Response (IVR) to field inbound calls and reroute the caller to the proper call agent. This work will also allow the customer service agent visibility into all the ways the customer has contacted Xcel Energy in the past and in trying to resolve the current request. Finally, this work will streamline the visibility of customer information to call center specialists, enabling them to respond to customer questions more immediately with necessary information at hand.
56	Electric General - Software	Remington	Enhance Capabilities	5.89		We are investing in analytics to help understand customer personas, preferences, and previous issues of our customers. Artificial Intelligence (AI) and Natural Language Understanding (NLU) will be used in conjunction with each other, and with data in the Customer Relationship Management Platform, to simplify the customer call experience and reroute the caller to the correct department.

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Line No.	(A) Asset Class	(B) Witness	(C) Project Category	(D) Additions to Plant-in-Service (Oct. 2020 - Dec. 2020)	(E) Total Affiliate Charges (Included in Column D)	(F) Project Description
57	Electric General - Software	Remington	Aging Technology	4.90		The project will update the CA Toolset monitors that our environments and generates notifications of situations which are referred to as "events". The events then need to be manually entered into IT Service Manager (ITSM) in order to create a ticket to assign to a group to become aware of the event and to take action to address it. This manual process causes a lag time in resolving issues as much as 30 minutes. Integrating these systems will automate the ticket generation in ITSM.
58	Electric General - Software	Remington	Emergent Demand	119,066.39		This project in the Emergent Demand category is a capital investment account created to ensure that Business Systems is able to meet unanticipated aging technology, cyber security threats, and efficiency needs that inevitably emerge each year. The Emergent Demand account allows Business Systems to address these types of issues without unnecessarily delaying or cancelling previously-planned projects or otherwise absorbing unplanned work and costs.
59	Electric General - Software	Remington	Savings Target	(313,293.60)		Savings target to reconcile approved budget.
60	**Total Electric General - Software**			**$ 9,567,938.31**	**$ 4,090,328.81**	
61						
62	**-December 2020 Budget Amounts**					
63	Electric General Plant	Remington	Aging Technology	$ 1,512,099.04		New service centers or offices are built as needed to support growing or expanding communities. Facility IT investments represent the necessary IT network infrastructure needed to connect these sites. This includes the construction of main distribution frames, intermediate distribution frames, cabling to connect workstations and phones, deployment of wireless access points, and the installation of any routers, switches and/or firewalls to secure the site
64	Electric General Plant	Remington	Aging Technology	1,034,563.73		The WAN SPS project is necessary to implement WAN reliability and capacity improvements for Distribution and Transmission substations, Energy Supply sites, Service Centers and third parties.
65	Electric General Plant	Remington	Aging Technology	905,942.27		The WAN SPS project is necessary to implement WAN reliability and capacity improvements for Distribution and Transmission substations, Energy Supply sites, Service Centers and third parties.

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	(A)	(B)	(C)	(D)	(E)	(F)
Line No.	**Asset Class**	**Witness**	**Project Category**	**Additions to Plant-in-Service (Oct. 2020 - Dec. 2020)**	**Total Affiliate Charges (Included in Column D)**	**Project Description**
66	Electric General Plant	Remington	Aging Technology	839,533.39		This project involved replacing equipment in SPS's private radio system. This private radio system is critical to SPS operations especially in times of storm restoration when public networks are not available. Replacing the repeaters eliminates risk to operations, customer satisfaction metrics, regulatory affairs, and financial performance from an extended radio system outage and lack of communications with field personnel and expand capability to support mobile and fixed data applications to enable increased productivity and safe operations.
67	Electric General Plant	Remington	Aging Technology	756,038.31		This project is the planned or scheduled replacement of aging personal computers ("PCs"), including laptops and desktops, when they reach the end of their useful lives.
68	Electric General Plant	Remington	Aging Technology	688,317.21		This project involves refreshing sites to Voice Over Internet Protocol ("VoIP") Systems PBX Corporate IP Standards. VoIP is a technology that allows for voice/ telephone communications to take place by using internet connection. This project addresses the systems that are in need of replacement (refresh by replacement) and the modern technologies that will be supported by this work effort improve the interface with customers.
69	Electric General Plant	Remington	Aging Technology	645,536.35		This project involved replacing network components on a regular schedule based on vendor support and end-of-life guidelines to ensure continued network reliability, meet NERC communications requirements, reduce safety concerns, and minimize replacement costs.
70	Electric General Plant	Remington	Aging Technology	398,556.44		This project is the planned or scheduled replacement of aging personal computers ("PCs"), including laptops and desktops, when they reach the end of their useful lives.
71	Electric General Plant	Remington	Aging Technology	397,742.06		This project is the planned or scheduled replacement of aging personal computers ("PCs"), including laptops and desktops, when they reach the end of their useful lives.
72	Electric General Plant	Remington	Enhance Capabilities	375,561.96		This project involved implementing reliable satellite connections in all Xcel Energy regions and enables dynamic network addressing for satellite connections that have already been deployed. This upgrade and expansion of satellite capabilities enables automated emergency cut-over and improves performance.

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October 1, 2020 through December 31, 2020

	(A)	(B)	(C)	(D)	(E)	(F)
Line No.	**Asset Class**	**Witness**	**Project Category**	**Additions to Plant-in-Service (Oct. 2020 - Dec. 2020)**	**Total Affiliate Charges (Included in Column D)**	**Project Description**
73	Electric General Plant	Remington	Enhance Capabilities	374,837.74		This project will implement local- and wide-area-network connectivity for each wind farm to meet publicly committed dates for commercial operation. The company has proposed 11 new wind farms in seven states, most of which are now approved by regulators. Plans call to add 3,380 megawatts of new wind generation companywide by 2021.
74	Electric General Plant	Remington	Enhance Capabilities	329,258.24		This project involved implementing reliable satellite connections in all Xcel Energy regions and enables dynamic network addressing for satellite connections that have already been deployed. This upgrade and expansion of satellite capabilities enables automated emergency cut-over and improves performance.
75	Electric General Plant	Remington	Aging Technology	93,438.59		This project entails the upgrade of aging analog radio systems to digital. These replacements and upgrades will complete the migration of Xcel's aging analog radio systems to the P25 digital standard and upgrade other system components that will be going out of support over this time period. Once completed, the Minnesota Metro radio will be a system on a common digital platform with system cores that integrate sub-systems into a reliable, supportable digital network.
76	Electric General Plant	Remington	Aging Technology	75,231.54		This project involved replacing network components on a regular schedule based on vendor support and end-of-life guidelines to ensure continued network reliability, meet NERC communications requirements, reduce safety concerns, and minimize replacement costs.
77	Electric General Plant	Remington	Aging Technology	68,051.93		Provides for the replacement of end of life and obsolete equipment within the Energy Management System (EMS).
78	Electric General Plant	Remington	Aging Technology	61,548.37		This project will replace Windows 2008 (or earlier) servers.
79	Electric General Plant	Remington	AGIS	24,075.00		The Advanced Distribution Management System ("ADMS") provides an integrated operating and decision software support system to assist control room, field personnel, and engineers with the monitoring, control, and optimization of the electric distribution system. This ADMS data project involved collecting and reviewing information about the electric distribution assets to ensure that the information available complies with the necessary level of detail needed for ADMS.
80	Electric General Plant	Remington	Aging Technology	17,749.89		Replace aged devices and fulfill new device request through the company.

Southwestern Public Service Company

Business Systems Capital Additions
October 1, 2020 through December 31, 2020

	(A)	(B)	(C)	(D)	(E)	(F)
Line No.	**Asset Class**	**Witness**	**Project Category**	**Additions to Plant-in-Service (Oct. 2020 - Dec. 2020)**	**Total Affiliate Charges (Included in Column D)**	**Project Description**
81	Electric General Plant	Remington	Enhance Capabilities	14,800.83		Due to significant growth in the SPS territory, additional Land Mobile Radio (LMR) coverage is needed. Adequate communication is critical to the safety and productivity of Xcel's field personnel. There is no cell phone coverage in the expanded territory, therefore, the only means of communications for workers is the LMR system. This project will add three new LMR sites to improve and expand the coverage area of radios. These three new sites are located in or near substations at the extreme south west SPS territory: Andrews, China Draw and County Line.
82	Electric General Plant	Remington	Aging Technology	7,149.55		New service centers or offices are built as needed to support growing or expanding communities. Facility IT investments represent the necessary IT network infrastructure needed to connect these sites. This includes the construction of main distribution frames, intermediate distribution frames, cabling to connect workstations and phones, deployment of wireless access points, and the installation of any routers, switches and/or firewalls to secure the site.
83	Electric General Plant	Remington	Aging Technology	7,139.00		The project replaces aged devices and fulfill new device request through the company.
84	Electric General Plant	Remington	Enhance Capabilities	6,334.72		The project involves deploying an application performance monitoring tool to improve visibility into issues affecting critical customer-impacting applications and provide insight into root causes.
85	Electric General Plant	Remington	Aging Technology	(3,317.28)		This project involved replacing equipment in SPS's private radio system. This private radio system is critical to SPS operations especially in times of storm restoration when public networks are not available. Replacing the repeaters eliminates risk to operations, customer satisfaction metrics, regulatory affairs, and financial performance from an extended radio system outage and lack of communications with field personnel and expand capability to support mobile and fixed data applications to enable increased productivity and safe operations.

Southwestern Public Service Company

Business Systems Capital Additions
October 1, 2020 through December 31, 2020

	(A)	(B)	(C)	(D)	(E)	(F)
Line No.	**Asset Class**	**Witness**	**Project Category**	**Additions to Plant-in-Service (Oct. 2020 - Dec. 2020)**	**Total Affiliate Charges (Included in Column D)**	**Project Description**
86	Electric General Plant	Remington	Emergent Demand	93,010.69		This project in the Emergent Demand category is a capital investment account created to ensure that Business Systems is able to meet unanticipated aging technology, cyber security threats, and efficiency needs that inevitably emerge each year. The Emergent Demand account allows Business Systems to address these types of issues without unnecessarily delaying or cancelling previously-planned projects or otherwise absorbing unplanned work and costs.
87	Electric General Plant	Remington	Emergent Demand	229,714.93		This project in the Emergent Demand category is a capital investment account created to ensure that Business Systems is able to meet unanticipated aging technology, cyber security threats, and efficiency needs that inevitably emerge each year. The Emergent Demand account allows Business Systems to address these types of issues without unnecessarily delaying or cancelling previously-planned projects or otherwise absorbing unplanned work and costs.
88	Electric General Plant	Remington	Savings Target	(849,172.22)		Savings target to reconcile approved budget.
89	**Total Electric General Plant**			**$ 8,103,742.28**	**$ 575,252.48**	
90						
91	**Grand Total**			**$ 17,671,680.59**	**$ 4,665,581.28**	

Southwestern Public Service Company

Summary of XES Expenses to SPS by Affiliate Class and Billing Method
For the Twelve Months Ended December 31, 2020

(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)	(I)	(J)	(K)	(L)
Line No.	Affliate Class	Billing Method (Cost Center)	Allocation Method	Total XES Billings for Class to all Legal Entities (FERC Acct. 400-935)	XES Billings for Class to all Legal Entities Except SPS (FERC Acct. 400-935)	XES Billings for Class to SPS (Total Company) (FERC Acct. 400-935)	Exclusions	Per Book	Pro Formas	Requested Amount (Total Company)	% of Class Charges
1	Business Systems	200063 - Executive - Corporate Governance	Assets/Revenue/No. of employees	$ (5,909.50)	$ (5,148.90)	$ (760.60)	$ -	$ (760.60)	$ -	$ (760.60)	0.00%
2	Business Systems	200068 - Corporate Finance, Treasury & Cash Management - Corporate Governance	Assets/Revenue/No. of employees	100,400.82	87,468.13	12,932.69	-	12,932.69	18.13	12,950.82	0.03%
3	Business Systems	200074 - Corporate Systems - Corporate Governance	Assets/Revenue/No. of employees	1,541,472.69	1,342,505.93	198,966.76	-	198,966.76	573.78	199,540.54	0.54%
4	Business Systems	200079 - Federal Lobbying	Assets/Revenue/No. of employees	825.11	717.88	107.23	(107.23)	-	-	-	0.00%
5	Business Systems	200081 - Accounting, Reporting, & Taxes	Assets/Revenue/No. of employees	89,309.73	76,227.13	13,082.60	-	13,082.60	0.09	13,082.69	0.04%
6	Business Systems	200086 - Legal & Claims Services	Assets/Revenue/No. of employees	82,184.02	70,082.02	12,102.00	-	12,102.00	-	12,102.00	0.03%
7	Business Systems	200087 - Accounting, Reporting & Tax - Regulated	Assets/Revenue/No. of employees	32,685.01	27,871.57	4,813.44	-	4,813.44	5.77	4,819.21	0.01%
8	Business Systems	200096 - Energy Markets - Business Services	Assets/Revenue/No. of employees	5,932,904.23	5,060,421.47	872,482.76	-	872,482.76	5,205.67	877,688.43	2.36%
9	Business Systems	200097 - Accounting and Finance Software Applications Maintenance	Assets/Revenue/No. of employees	430,650.57	367,534.52	63,116.05	-	63,116.05	7.76	63,123.81	0.17%
10	Business Systems	200104 - Accounting & Reporting – PSCo & SPS	Assets/Revenue/No. of employees	7,402.28	5,168.83	2,233.45	-	2,233.45	15.75	2,249.20	0.01%
11	Business Systems	200108 - Advanced Metering Infrastructure (AMI)	No. of AMI Meters	854,479.44	854,479.44	-	-	-	-	-	0.00%
12	Business Systems	200111 - Enterprise Application Integration (EAI)	Avg of Select Set Softwr Allctrs	102,639,979.68	90,926,183.68	11,713,796.00	-	11,713,796.00	0.07	11,713,796.07	31.52%
13	Business Systems	200112 - Mainframe Charges	Avg of Select Set Softwr Allctrs	4,857,719.44	4,513,616.04	344,103.40	-	344,103.40	7.23	344,110.63	0.93%
14	Business Systems	200115 - Miscellaneous Applications	Average of All Software Percent	31,366,872.70	28,029,084.84	3,337,787.86	-	3,337,787.86	1,395.71	3,339,183.57	8.98%

Southwestern Public Service Company

Summary of XES Expenses to SPS by Affiliate Class and Billing Method
For the Twelve Months Ended December 31, 2020

(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)	(I)	(J)	(K)	(L)
Line No.	Affliate Class	Billing Method (Cost Center)	Allocation Method	Total XES Billings for Class to all Legal Entities (FERC Acct. 400-935)	XES Billings for Class to all Legal Entities Except SPS (FERC Acct. 400-935)	XES Billings for Class to SPS (Total Company) (FERC Acct. 400-935)	Exclusions	Per Book	Pro Formas	Requested Amount (Total Company)	% of Class Charges
15	Business Systems	200116 - Distribution Electric Supervision & Engineering (S&E) FERC 580	Electric Distribution Plant	3,816.03	3,425.35	390.68	-	390.68	-	390.68	0.00%
16	Business Systems	200117 - Distribution Electric Metering FERC 586	Electric Distribution Plant	1,754.96	1,542.71	212.25	-	212.25	6.37	218.62	0.00%
17	Business Systems	200118 - Distribution Electric Load Dispatching/EMS FERC 581	Electric Distribution Plant	230,897.18	202,974.28	27,922.90	-	27,922.90	18.37	27,941.27	0.08%
18	Business Systems	200119 - Distribution Electric & Gas Miscellaneous FERC 588 & 880	Elec Dist Plant Gas Dist Plant	2,423,128.64	2,212,317.20	210,811.44	-	210,811.44	94.18	210,905.62	0.57%
19	Business Systems	200123 - Transmission Electric Reliability, Planning, & Standards Development FERC 561.5	Electric Transmission Plant	49,444.06	34,725.38	14,718.68	-	14,718.68	83.33	14,802.01	0.04%
20	Business Systems	200124 - Transmission Electric Load Dispatch-Monitor and Operate Transmission System FERC 561.2	Electric Transmission Plant	1,223,998.65	852,689.32	371,309.33	-	371,309.33	1,319.83	372,629.16	1.00%
21	Business Systems	200126 - Utilities Group Administrative & General (A&G) FERC 921	ElcTrn ElcDst GasTrn GasDst Plnt	4,762.00	3,971.67	790.33	-	790.33	-	790.33	0.00%
22	Business Systems	200128 - Distribution Gas Miscellaneous FERC 880	Gas Distribution Plant	118,712.08	118,712.08	-	-	-	-	-	0.00%
23	Business Systems	200129 - Distribution Gas Meters and House Regulators FERC 878	Gas Distribution Plant	223.65	223.65	-	-	-	-	-	0.00%
24	Business Systems	200131 - Distribution & Transmission Gas System Control and Load Dispatching FERC 851 & 871	Gas Trans Plant Gas Dist Plant	1,175,415.72	1,175,415.72	-	-	-	-	-	0.00%

Southwestern Public Service Company

Summary of XES Expenses to SPS by Affiliate Class and Billing Method
For the Twelve Months Ended December 31, 2020

(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)	(I)	(J)	(K)	(L)
Line No.	Affliate Class	Billing Method (Cost Center)	Allocation Method	Total XES Billings for Class to all Legal Entities (FERC Acct. 400-935)	XES Billings for Class to all Legal Entities Except SPS (FERC Acct. 400-935)	XES Billings for Class to SPS (Total Company) (FERC Acct. 400-935)	Exclusions	Per Book	Pro Formas	Requested Amount (Total Company)	% of Class Charges
25	Business Systems	200132 - Payment and Reporting	Invoice Transactions	255,589.01	228,669.62	26,919.39	-	26,919.39	-	26,919.39	0.07%
26	Business Systems	200134 - Proprietary Trading - Front/Mid Office FERC 557	Joint Operating Agreement	20,523.61	16,129.79	4,393.82	-	4,393.82	12.06	4,405.88	0.01%
27	Business Systems	200135 - Energy Supply Business Resources	MWH Generation	2,195.21	1,674.36	520.85	-	520.85	4.03	524.88	0.00%
28	Business Systems	200137 - Energy Supply Miscellaneous Power Expense FERC 506, 539, & 549	MWH Generation	25,575.25	19,563.77	6,011.48	-	6,011.48	170.07	6,181.55	0.02%
29	Business Systems	200146 - Energy Markets - Regulated Trading	MWH Hours Sold	10,084.48	7,441.02	2,643.46	-	2,643.46	9.08	2,652.54	0.01%
30	Business Systems	200147 - Business Objects	Number of Business Objects Users	1,113,235.96	989,310.02	123,925.94	-	123,925.94	2,040.42	125,966.36	0.34%
31	Business Systems	200148 - Business Systems	Number of Computers	73,828,212.34	64,074,863.24	9,753,349.10	(639.61)	9,752,709.49	94,261.11	9,846,970.60	26.49%
32	Business Systems	200149 - Customer & Enterprise Solutions (CES)	Number of Computers Customers Empl	2,071,979.59	1,831,871.62	240,107.97	-	240,107.97	-	240,107.97	0.65%
33	Business Systems	200150 - Interactive Voice Response (IVR)	Number of Contacts	771,187.04	649,430.50	121,756.54	-	121,756.54	-	121,756.54	0.33%
34	Business Systems	200152 - Customer Care 902	Number of Customers	909,191.68	846,258.13	62,933.55	(0.22)	62,933.33	1,323.02	64,256.35	0.17%
35	Business Systems	200154 - Customer Service Information Technology (IT) FERC 903	Number of Customers	15,676.11	14,589.20	1,086.91	-	1,086.91	0.00	1,086.91	0.00%
36	Business Systems	200155 - Customer Care FERC 903	Number of Customers	221.65	206.29	15.36	-	15.36	-	15.36	0.00%
37	Business Systems	200162 - Call Logging and Quality Management (CL/QM) FERC 903	Number of Cust Number of Contacts	375,704.79	333,006.11	42,698.68	-	42,698.68	-	42,698.68	0.11%
38	Business Systems	200165 - Employee Management Systems	Number of Employees	1,210,160.04	1,034,343.44	175,816.60	-	175,816.60	70.08	175,886.68	0.47%
39	Business Systems	200166 - Human Resources (Diversity/Safety/Employee Relations)	Number of Employees	2,243,061.49	1,915,250.09	327,811.40	-	327,811.40	234.83	328,046.23	0.88%

Southwestern Public Service Company

Summary of XES Expenses to SPS by Affiliate Class and Billing Method
For the Twelve Months Ended December 31, 2020

(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)	(I)	(J)	(K)	(L)
Line No.	**Affliate Class**	**Billing Method (Cost Center)**	**Allocation Method**	**Total XES Billings for Class to all Legal Entities (FERC Acct. 400-935)**	**XES Billings for Class to all Legal Entities Except SPS (FERC Acct. 400-935)**	**XES Billings for Class to SPS (Total Company) (FERC Acct. 400-935)**	**Exclusions**	**Per Book**	**Pro Formas**	**Requested Amount (Total Company)**	**% of Class Charges**
40	Business Systems	200167 - e-Business	Number of Employees	185,086.81	158,121.61	26,965.20	-	26,965.20	-	26,965.20	0.07%
41	Business Systems	200168 - Gas Management System (GMS) FERC 866 & 880	Number of Gas Customers	392,661.08	392,661.08	-	-	-	-	-	0.00%
42	Business Systems	200169 - Energy Supply Systems Miscellaneous FERC 417.1, 506, 539, & 549	Number of Maximo Users	433,695.88	336,416.16	97,279.72	(74.98)	97,204.74	352.79	97,557.53	0.26%
43	Business Systems	200170 - Meter Reading and Monitoring Systems FERC 902	Number of Meters	2,264,452.25	2,112,330.49	152,121.76	-	152,121.76	147.98	152,269.74	0.41%
44	Business Systems	200171 - Customer Resource System (CRS) FERC 903	Number of Mtrs Number of Cntacts	4,557,515.31	4,044,700.97	512,814.34	(0.40)	512,813.94	4,332.67	517,146.61	1.39%
45	Business Systems	200172 - Network	Phones Radios Computers	12,736,805.56	11,069,331.29	1,667,474.27	(836.40)	1,666,637.87	17,547.48	1,684,185.35	4.53%
46	Business Systems	200176 - Marketing & Sales	Revenue	1,170.38	998.50	171.88	-	171.88	2.25	174.13	0.00%
47	Business Systems	200180 - EMS-Shared (Energy Management System-SCADA) FERC 556, 561.2, & 581	Elec Prod Elec Trns Elec Dst Plnt	3,746,217.45	3,063,883.88	682,333.57	(14.62)	682,318.95	5,732.85	688,051.80	1.85%
48	Business Systems	200184 - PowerPlan	Total Plant	607,143.48	516,304.96	90,838.52	-	90,838.52	5.58	90,844.10	0.24%
49	Business Systems	Direct	Direct	60,605,135.94	54,913,483.66	5,691,652.28	-	5,691,652.28	19,849.08	5,711,501.36	15.37%
50	**Business Systems Total**			**$321,545,611.58**	**$284,533,049.74**	**$37,012,561.84**	**$ (1,673.46)**	**$37,010,888.38**	**$ 154,847.44**	**$ 37,165,735.82**	**100.00%**
51	**Total Witness Michael O. Remington**			**$321,545,611.58**	**$284,533,049.74**	**$37,012,561.84**	**$ (1,673.46)**	**$37,010,888.38**	**$ 154,847.44**	**$ 37,165,735.82**	
	Amounts may not add or tie to other schedules due to rounding										

Southwestern Public Service Company

XES Expenses by Affiliate Class, Activity, Billing Method and FERC Account

Michael O. Remington

2021 TX Rate Case

APPLICATION OF
SOUTHWESTERN PUBLIC SERVICE COMPANY
FOR AUTHORITY TO CHANGE RATES

MOR-RR-B(CD) is provided in electronic format.

Southwestern Public Service Company

Exclusions from XES Expense to SPS
For the Twelve Months Ended December 31, 2020

(A)	(B)	(C)	(D)	(E)
Line No.	**Affiliate Class**	**FERC Account**	**Explanation for Exclusions**	**Exclusions (Total Company)**
1	Business Systems	426.4 - Expenditures for certain civic, political and related activities	Below the Line	$ (107.23)
2	Business Systems	426.5 - Other Deductions	Below the Line	(1,566.23)
3	**Business Systems Total**			**$ (1,673.46)**
4	**Total Witness Michael O. Remington**			**$ (1,673.46)**
	Amounts may not add or tie to other schedules due to rounding			

Southwestern Public Service Company

Pro Forma Adjustments to XES Expenses by Affiliate Class and FERC Account
For the Twelve Months Ended December 31, 2020

(A)	(B)	(C)	(D)	(E)	(F)
Line No.	**Affiliate Class**	**FERC Account**	**Explanation for Pro Formas**	**Sponsor**	**Pro Formas (Total Company)**
1	Business Systems	506 - Miscellaneous steam power expenses	3% Wage Adjustment	Stephanie N. Niemi/Michael P. Deselich	$ 707.91
2	Business Systems	506 - Miscellaneous steam power expenses	Business Area Adjustment	Michael O. Remington	(0.31)
3	Business Systems	549 - Miscellaneous other power generation expenses	3% Wage Adjustment	Stephanie N. Niemi/Michael P. Deselich	35.89
4	Business Systems	556 - System control and load dispatching	3% Wage Adjustment	Stephanie N. Niemi/Michael P. Deselich	127.93
5	Business Systems	556 - System control and load dispatching	Annual Incentive Target Adjustment	Stephanie N. Niemi/Michael P. Deselich	(0.04)
6	Business Systems	557 - Other expenses	3% Wage Adjustment	Stephanie N. Niemi/Michael P. Deselich	12.06
7	Business Systems	560 - Operation supervision and engineering	3% Wage Adjustment	Stephanie N. Niemi/Michael P. Deselich	17,710.33
8	Business Systems	561.2 - Load dispatch-Monitor and operate transmiss system	3% Wage Adjustment	Stephanie N. Niemi/Michael P. Deselich	5,570.73
9	Business Systems	561.2 - Load dispatch-Monitor and operate transmiss system	Annual Incentive Target Adjustment	Stephanie N. Niemi/Michael P. Deselich	(1.40)
10	Business Systems	561.2 - Load dispatch-Monitor and operate transmiss system	Business Area Adjustment	Michael O. Remington	(0.18)
11	Business Systems	561.5 - Reliability planning and standards development	3% Wage Adjustment	Stephanie N. Niemi/Michael P. Deselich	89.31
12	Business Systems	561.5 - Reliability planning and standards development	Business Area Adjustment	Michael O. Remington	(5.98)
13	Business Systems	581 - Load dispatching	3% Wage Adjustment	Stephanie N. Niemi/Michael P. Deselich	1,554.71
14	Business Systems	581 - Load dispatching	Annual Incentive Target Adjustment	Stephanie N. Niemi/Michael P. Deselich	(0.45)
15	Business Systems	581 - Load dispatching	Business Area Adjustment	Michael O. Remington	(2.15)
16	Business Systems	586 - Meter expenses	3% Wage Adjustment	Stephanie N. Niemi/Michael P. Deselich	6.37

Southwestern Public Service Company

Pro Forma Adjustments to XES Expenses by Affiliate Class and FERC Account
For the Twelve Months Ended December 31, 2020

(A)	(B)	(C)	(D)	(E)	(F)
Line No.	**Affiliate Class**	**FERC Account**	**Explanation for Pro Formas**	**Sponsor**	**Pro Formas (Total Company)**
17	Business Systems	588 - Miscellaneous distribution expenses	3% Wage Adjustment	Stephanie N. Niemi/Michael P. Deselich	179.83
18	Business Systems	588 - Miscellaneous distribution expenses	Business Area Adjustment	Michael O. Remington	(0.12)
19	Business Systems	902 - Meter reading expenses	3% Wage Adjustment	Stephanie N. Niemi/Michael P. Deselich	1,541.23
20	Business Systems	902 - Meter reading expenses	Annual Incentive Target Adjustment	Stephanie N. Niemi/Michael P. Deselich	(0.00)
21	Business Systems	902 - Meter reading expenses	Business Area Adjustment	Michael O. Remington	(1.81)
22	Business Systems	903 - Customer records and collection expenses	3% Wage Adjustment	Stephanie N. Niemi/Michael P. Deselich	4,443.40
23	Business Systems	903 - Customer records and collection expenses	Annual Incentive Target Adjustment	Stephanie N. Niemi/Michael P. Deselich	(0.00)
24	Business Systems	903 - Customer records and collection expenses	Business Area Adjustment	Michael O. Remington	(0.16)
25	Business Systems	920 - Administrative and general salaries	3% Wage Adjustment	Stephanie N. Niemi/Michael P. Deselich	123,848.77
26	Business Systems	920 - Administrative and general salaries	Annual Incentive Target Adjustment	Stephanie N. Niemi/Michael P. Deselich	(41.00)
27	Business Systems	921 - Office supplies and expenses	Business Area Adjustment	Michael O. Remington	(927.48)
28	Business Systems	926 - Employee pensions and benefits	3% Wage Adjustment	Stephanie N. Niemi/Michael P. Deselich	0.06
29	**Business Systems Total**				**$ 154,847.44**
30	**Total Witness Michael O. Remington**				**$ 154,847.44**
	Amounts may not add or tie to other schedules due to rounding				