

BEFORE THE NEW MEXICO PUBLIC REGULATION COMMISSION

IN THE MATTER OF SOUTHWESTERN)
PUBLIC SERVICE COMPANY'S)
APPLICATION REQUESTING A)
DETERMINATION ON LOCATION)
APPROVAL OF TWO SOLAR FACILITIES, A)
BATTERY ENERGY STORAGE SYSTEM,)
AND A 230 KV TRANSMISSION)
GENERATION TIE LINE IN LEA COUNTY)
AND OTHER ASSOCIATED RELIEF,) **CASE NO. 24-00 ____ -UT**
)
SOUTHWESTERN PUBLIC SERVICE)
COMPANY,)
)
APPLICANT.)
)
)
)

DIRECT TESTIMONY

of

BROOKE A. TRAMMELL

on behalf of

SOUTHWESTERN PUBLIC SERVICE COMPANY

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GLOSSARY OF ACRONYMS AND DEFINED TERMS

<u>Acronym/Defined Term</u>	<u>Meaning</u>
BESS	Battery Energy Storage System
Commission	New Mexico Public Regulation Commission
CCN	Certificate of Public Convenience and Necessity
Cunningham	Cunningham Generating Station
EA	Environmental Assessment and Routing Analysis
FERC	Federal Energy Regulatory Commission
Gen-tie line	230-Kv/115-Kv (“Kilovolt”) Double Circuit Transmission Line
kV	Kilovolt(s)
Large Capacity Plant	generation facilities capable of operation at 300 MW or more
Large Capacity Transmission Lines	location of transmission lines that operate at 230 kV or more
Location Approval Rule	Rule 17.9.592 NMAC
Location Approval Statute	Section 62-9-3 of the Public Utility Act
NMPRC	New Mexico Public Regulation Commission
NMSU	New Mexico State University
MW	Megawatt
NEPA	National Environmental Policy Act

<u>Acronym/Defined Term</u>	<u>Meaning</u>
NMSLO	New Mexico State Land Office
PNM	Public Service Company of New Mexico
PSCo	Public Service Company of Colorado
Proposed Project	Proposed 230-kV/115-kV double circuit transmission (Gen-tie) line that will extend from SPS's Cunningham Solar Collector Substation to its Cunningham Generating Station in Lea County, New Mexico
PUA	New Mexico Public Utility Act (NMSA 1978, §§ 62-3-1 <i>et seq.</i>)
RFP	Request for Proposals
Southwest Power Pool Inc.	Southwest Power Pool
SPS Self-build Projects	Cunningham 1 Solar Project, Cunningham 2 Solar Project, and Cunningham 1 Battery
SPS Solar Projects	Cunningham 1 Solar Project and Cunningham 2 Solar Project
SPS	Southwestern Public Service Company, a New Mexico corporation
TNMP	Texas-New Mexico Power Company
Xcel Energy	Xcel Energy Inc.

LIST OF ATTACHMENTS

<u>Attachment</u>	<u>Description</u>
BAT-1	List of Prior Testimony (Filename: BAT-1.xlsx)
BAT-2	Proposed Project Overview Map: 230-kV/115-kV double circuit transmission (Gen-tie) line from Cunningham Solar Collector Substation to Cunningham Generation Substation, Lea County, New Mexico
BAT-3	Vicinity Map of SPS's Southeastern New Mexico Transmission Facilities
BAT-4	One-line Electrical Schematic Diagram for Proposed Project -Interconnection of new 230-kV/115-kV double circuit transmission (Gen-tie) line to SPS's transmission system

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of
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1 **I. WITNESS IDENTIFICATION AND QUALIFICATIONS**

2 **Q. Please state your name and business address.**

3 A. My name is Brooke A. Trammell, and my business address is 790 S. Buchanan
4 Street, Amarillo, Texas 79101.

5 **Q. On whose behalf are you testifying?**

6 A. I am filing testimony on behalf of Southwestern Public Service Company, a New
7 Mexico corporation (“SPS”) and wholly-owned subsidiary of Xcel Energy Inc.
8 (“Xcel Energy”).¹

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

10 A. I am employed by SPS as Regional Vice President, Regulatory and Pricing.

11 **Q. Please briefly outline your responsibilities as Regional Vice President,
12 Regulatory and Pricing.**

13 A. I am responsible for providing leadership, direction, and technical expertise
14 related to regulatory processes and functions for SPS. I manage and oversee
15 regulatory staff assigned to ratemaking, planning, policy, and resource transition
16 matters. My duties include the design and implementation of SPS’s regulatory

¹ Xcel Energy is the parent company of four utility 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. Xcel Energy’s natural gas pipeline company is WestGas Interstate, Inc. Through its subsidiary, Xcel Energy Transmission Holding Company, LLC, Xcel Energy also owns three transmission-only operating companies: Xcel Energy Southwest Transmission Company, LLC; Xcel Energy Transmission Development Company, LLC; and Xcel Energy West Transmission Company, LLC, all of which are either currently regulated by the Federal Energy Regulatory Commission (“FERC”) or expected to be regulated by the FERC.

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1 strategy and programs, as well as the direction and supervision of SPS's
2 regulatory activities, including oversight of rate filings, administration of tariffs,
3 rules and forms, regulatory case direction and administration, compliance
4 reporting, and compliant responses. I oversee the facilitation of the development
5 of policy topics and advocacy to be included in regulatory filings, as well as the
6 coordination of overall preparation of filed testimony, attachments, schedules and
7 workpapers to produce filings in accordance with applicable rules and procedures
8 in the regulatory jurisdictions in which SPS operates.

9 **Q. Describe your educational background.**

10 A. I hold a Master of Business Administration from West Texas A&M University, a
11 Master of Arts in economics with a specialization in public utility regulation from
12 New Mexico State University ("NMSU"), and a Bachelor of Science in
13 agricultural economics and agricultural business from NMSU.

14 I have completed technical education programs facilitated by the Edison
15 Electric Institute and the American Gas Association focused on regulation,
16 ratemaking, and utility accounting topics as well as completed executive and
17 professional educational programs at the University of St. Thomas – Minnesota
18 and the University of Wisconsin – Madison's Wisconsin Public Utility Institute.

19 **Q. Please describe your professional experience.**

20 A. I have worked within Xcel Energy for over a decade, beginning my career with
21 SPS in September 2012 as a Case Specialist. From January 2014 to June 2016, I

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1 was Manager, Rate Cases, and was responsible for the strategic oversight of
2 SPS's regulatory activity in Texas. Beginning in 2016, I joined the SPS operating
3 company leadership team as the Director of Customer and Community Relations.
4 In June 2018, I accepted the position of Regional Vice President, Rates &
5 Regulatory Affairs for Public Service Company of Colorado ("PSCo"), the
6 operating company subsidiary of Xcel Energy that provides electric, natural gas,
7 and regulated steam service in Colorado. In June 2022, I returned to SPS in my
8 current role as Regional Vice President, Regulatory & Pricing.

9 Prior to Xcel Energy, I was employed by PNMR Services Company, a
10 wholly owned subsidiary of Public Service Company of New Mexico ("PNM")
11 Resources, Inc., the parent holding company of PNM and Texas-New Mexico
12 Power Company ("TNMP"). I held various roles in the then pricing and
13 regulatory services department including Rates Analyst II, Senior Rates Analyst,
14 and Project Manager, Federal Regulatory Affairs. In these positions, I provided
15 cost of service, cost allocation, pricing, and rate design analysis to support general
16 rate cases, audited rate calculations and filing packages, and managed regulatory
17 filings and proceedings in the company's retail jurisdictions before managing
18 PNM's regulatory proceedings before the Federal Energy Regulatory Commission
19 ("FERC") and leading strategic regulatory and transmission policy initiatives.

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1 **Q. Have you testified before any regulatory authorities?**

2 A. Yes. I have previously testified on behalf of SPS in New Mexico Public
3 Regulation Commission (“NMPRC” or “Commission”) Case Nos. 22-00178-UT,
4 22-00286-UT, 23-00252-UT, 23-00271-UT, and 23-00384-UT. I have also
5 testified on behalf of SPS in Public Utility Commission of Texas Docket Nos.
6 42004, 45560, 44498, 53034, and 53529, 54634, 54952, 55255, 55849, and
7 55973. I have also submitted written testimony in Docket No. 39362 on behalf of
8 TNMP and on behalf of PSCo, I have testified in numerous proceedings before
9 the Colorado Public Utilities Commission regarding a variety of topics related to
10 PSCo’s electric, natural gas, and steam utility services. A list of the regulatory
11 proceedings in which I have testified is provided as Attachment BAT-1 to my
12 direct testimony.

1 **II. SUMMARY OF SPS'S REQUESTS**

2 **Q. Please describe the approvals requested in the Application.**

3 A. In Case No. 23-00252-UT, which is currently pending before the Commission,
4 SPS requests that the Commission issue a Certificate of Public Convenience and
5 Necessity ("CCN") that authorizes SPS to construct and operate the following
6 facilities located in Lea County near Hobbs, New Mexico:

- 7 • Cunningham Generating Station ("Cunningham") 1 Solar, a 72
8 Megawatt ("MW") solar facility located at SPS's existing
9 Cunningham Generating Station;
- 10 • Cunningham 2 Solar, a 196 MW solar facility located at SPS's
11 existing Cunningham Generating Station (collectively, "SPS Solar
12 Projects"); and
- 13 • Cunningham 1 Battery, a 36 MW battery energy storage system
14 located at SPS's existing Cunningham Generating Station
15 ("BESS") (collectively "SPS Self-Build Projects").²

16 As part of Case No. 23-00252-UT, SPS also proposes to construct and operate a
17 230-kilovolt ("kV")/115-Kv double circuit transmission (Gen-tie) line route and
18 associated facilities that will extend from SPS's Cunningham Solar Collection
19 Substation at the SPS Solar Projects to its existing Cunningham Generating
20 Station ("Gen-tie line").

² Application of Southwestern Public Service Company Requesting: (1) Issuance of a Certificate of Public Convenience and Necessity to Construct and Operate Solar Generation and Battery Storage Projects and Associated Facilities; (2) Authorization of Related Ratemaking Principles Including Accrual of an Allowance for Funds Used During Construction; (3) Authorization to Abandon the Cunningham Unit 2 Generating Station; and (4) Other Associated Relief, Case No. 23-00252-UT.

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1 Section 62-9-3 of the Public Utility Act (“Location Approval Statute”) and
2 Rule 17.9.592 (“Location Approval Rule”) require parties to obtain Commission
3 approval of the location of generation facilities capable of operation at 300 MW
4 or more (“Large Capacity Plants”) and the location of transmission lines that
5 operate at 230 kV or more (“Large Capacity Transmission Lines”) and are
6 connected to a Large Capacity Plant. Because each of the SPS Self-Build Projects,
7 individually, will not meet the 300 MW threshold, location approval would not be
8 required for the SPS Self-Build Projects or the Gen-tie line unless the
9 Commission determines the capacity of the SPS Self-Build Projects should be
10 aggregated. If the generating capacity of the SPS Self-Build Projects were to be
11 aggregated, then the facilities are collectively capable of operating at 304 MW,
12 which exceeds the 300 MW threshold set out in the Location Approval Statute and
13 Rule.

14 The Commission has recently declined to aggregate generating facilities
15 and battery storage systems for purposes of location approval.³ However, in other

³ *In the Matter of the Petition for Declaratory Order or, in the Alternative, Application of San Juan Solar Project, LLC for Determination of Right-of-Way Width for the San Juan Solar Gen-Tie*, Case No. 21-00154-UT, Order on Requirement for Location Approval for the San Juan Solar Project at ¶ 15 (Aug. 4, 2021); see also *In the Matter of the Joint Application of Atrisco Solar LLC and Atrisco Energy Storage LLC for Location Approval of the Atrisco Solar & Storage Facilities and Associated Transmission Facilities in Bernalillo Cnty., New Mexico Pursuant to NMSA § 62-9-3; and Right-of-Way Width Determination Pursuant to NMSA § 62-9-3.2*, Case No. 22-00161-UT, Final Order Adopting Recommended Decision with Modifications at 3 (“The Commission concludes that the energy-storage facilities Atrisco proposes are not generation facilities and therefore do not require location approval under Section 62-9-3.”) (Oct. 26, 2022).

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1 prior decisions, the Commission considered the combined capacity of other types
2 of generating facilities in determining whether location approval was required.⁴
3 Thus, although it appears from prior Commission precedent that location approval
4 should not be required here because the 300 MW threshold is not met if the
5 capacity from the BESS is excluded, SPS is providing information in this
6 application that satisfies the Commission’s location approval requirements in the
7 event the Commission determines it is required. If the Commission determines
8 location approval is not required because the capacity of the facilities should not
9 be aggregated, SPS requests that the Commission issue an order to that effect.

10 **Q. Does SPS request that the Commission issue a decision in this matter within**
11 **a specified period of time?**

12 A. Yes. Section 62-9-3(K) provides that the Commission may approve an application
13 for location approval without a hearing if no protest is filed within 60 days of the
14 date notice is given and) requires the Commission to issue a decision within six
15 months from the date an application is filed. However, Section 62-9-3(K)(3)
16 provides that if a utility files an application for location approval of a transmission
17 line while its application for a CCN is pending – which is the case here – the

⁴ *In the Matter of the Joint Application for Location Approval of the 2022 Corona Generation Expansion Pursuant to the Pub. Util. Act, NMSA 1978, § 62-9-3 Ancho Wind LLC, Cowboy Mesa LLC, Gallinas Mountain Wind LLC, Mesa Canyons Wind LLC, Pattern Sc Holdings LLC, Viento Loco LLC, Joint Applicants., Case No. 22-00202-UT, Recommended Decision at 1-2 (Dec. 8, 2022).*

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1 Commission shall issue its order granting or denying the application for location
2 approval within ninety days from the date the CCN application is approved.
3 Section 62-9-3(L) allows the Commission to extend the deadline to approve the
4 location of a transmission line for an additional nine months if necessary to
5 determine whether the line will unduly impair important environmental values.

6 In this case, SPS requests that the Commission issue a decision within 60
7 days after notice is given if no protest is filed, or if a protest is filed, within 90
8 days of the Commission’s final order in Case No. 23-00252-UT. SPS expects to
9 receive a decision in Case No. 23-00252-UT in June of 2024. SPS will issue a
10 new Request for Proposals (“RFP”) in July 2024 to acquire resources identified
11 during its recently approved Integrated Resource Plan, and it would be beneficial
12 for SPS to know whether it is authorized to proceed with the SPS Self-Build
13 Projects, including with respect to their location, prior to issuing the RFP.

1 **III. SUMMARY OF TESTIMONY AND RECOMMENDATIONS**

2 **Q. What is the purpose of your testimony?**

3 A. My testimony: (1) provides an overview of SPS, the SPS Self-Build Projects, and
4 the Gen-tie line; (2) describes the location approval requirements and identifies
5 the witnesses who address each requirement; and (3) establishes SPS’s
6 compliance with certain components of the Location Approval Statute and Rule.

7 **Q. Please summarize your testimony.**

8 A. As discussed in detail in Case No. 23-00252-UT, the SPS Self-Build Projects are
9 needed to meet capacity needs because SPS’s service territory is experiencing
10 material customer growth and economic development and resource adequacy
11 requirements are evolving in the Southwest Power Pool, Inc. (“Southwest Power
12 Pool”). Those items, paired with the retirement of aging generation units that
13 have served SPS customers for over 70 years, has created a capacity need on
14 SPS’s system.

15 The SPS Self-Build Projects will be located at SPS’s existing Cunningham
16 Generating Station and will comply with air, water, and land use permitting
17 requirements. The proposed Gen-tie line will connect the SPS Self-Build Projects
18 with the Cunningham Generating Station and will not unduly impair important
19 environmental values or violate any land use requirements. Accordingly, to the

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1 extent the Commission determines location approval is required, it should be
2 granted.

3 **Q. Was Attachment BAT-1 prepared by you or under your direct supervision**
4 **and control?**

5 A. Yes.

6 **Q. Are Attachments BAT-2, BAT-3, and BAT-4 true and correct copies of the**
7 **documents you represent them to be?**

8 A. Yes.

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1 is thus in a different resource position than other New Mexico utilities that are
2 members of the Western Electricity Coordinating Council as well as other Texas
3 utilities that are members of the Electric Reliability Council of Texas.

4 **Q. Please generally describe the SPS Self-Build Projects.**

5 A. The Cunningham 1 Solar Project will be a 72 MW solar facility located on 6,442
6 acres, and the Cunningham 2 Solar Project will be a 196 MW solar facility
7 located on the same 6,442 acres. The Cunningham 1 Battery will be a 36 MW,
8 four-hour BESS system that will use SPS's surplus interconnection service at the
9 Cunningham Generating Station as part of SPS's plan to retain accredited
10 capacity of 72 MW at that point of interconnection. The projects will be located
11 west of Hobbs, New Mexico in Lea County. A map that depicts the location of the
12 proposed facilities is provided as Attachment BAT-3 to my direct testimony.

13 **Q. Will the SPS Self-Build Projects unduly impair system reliability?**

14 A. No, the SPS Self-Build Projects will not impair system reliability.

15 **Q. Please describe the Gen-Tie Line.**

16 A. The proposed 230-kV/115-kV double circuit transmission (Gen-tie) line will
17 connect SPS's existing Cunningham Generation Substation, located
18 approximately 10 miles west of Hobbs, New Mexico, to the new Cunningham
19 Solar Collector Substation, which is located approximately 10.5 miles northwest

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1 of Hobbs, New Mexico. The proposed transmission line is approximately 7.0
2 miles (37,117 feet) in length and is shown on Attachment BAT-3.

3 **Q. Has SPS demonstrated a need for the SPS Self-Build Projects and the Gen-**
4 **Tie Line?**

5 A. Yes. As discussed in SPS's direct and rebuttal testimony in Case No. 23-00252-
6 UT, SPS has demonstrated, and no party has disputed, its need for these projects.

1 **V. SUMMARY OF LOCATION APPROVAL REQUIREMENTS AND**
2 **INTRODUCTION OF WITNESSES**

3 **A. LOCATION APPROVAL OF LARGE CAPACITY**
4 **TRANSMISSION LINES**

5 **Q. Please briefly describe the location approval requirements that apply to**
6 **Large Capacity Transmission Lines.**

7 A. Section 62-9-3 of the Public Utility Act (“PUA”) governs location approval
8 for Large Capacity Transmission Lines and associated substation facilities.
9 Section 62-9-3(F) provides that the location of a transmission line shall be
10 approved unless the location will unduly impair important environmental
11 values or power system reliability. Section 62-9-3(M) establishes that
12 important environmental values include: (1) existing plans of the state, local
13 government and private entities for other developments at or in the vicinity of the
14 proposed location; (2) fish, wildlife and plant life; (3) noise emission levels and
15 interference with communication signals; (4) the proposed availability of the
16 location to the public for recreational purposes, consistent with safety
17 considerations and regulations; (5) existing scenic areas, historic, cultural or
18 religious sites and structures or archaeological sites at or in the vicinity of the
19 proposed location; and (6) additional factors that require consideration under
20 applicable federal and state laws pertaining to the location. Section 62-9-3(G)
21 provides that an application shall not be approved if it violates an existing state,

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1 county, or municipal land use statute or regulation unless the Commission finds
2 the regulation is unreasonably restrictive.

3 Rule 17.9.592.10 implements the statute and requires an applicant to
4 provide:

5 (A) a description of the transmission line including, but not limited to:

- 6 1. the location of the transmission line and a map depicting
7 the location in electronic and physical format with a scale not
8 to exceed one inch equals five miles;
- 9 2. identification of the ownership of the land (such as private,
10 New Mexico State Land Office (“NMSLO”), U.S. Forest
11 Service, state trust, etc.) the transmission line will cross and the
12 number of feet the transmission line will cross over each
13 owner’s land;
- 14 3. the total length of transmission line in feet;
- 15 4. a description of interconnection facilities;
- 16 5. a schematic diagram showing the transmission line and the
17 interconnection of the transmission line to the transmission
18 grid;

19 (B) identification of all applicable land use statutes and administrative
20 regulations and proof of compliance or statement of
21 noncompliance with each;

22 (C) if required under the National Environmental Policy Act
23 (“NEPA”), an EA (“Environmental Assessment”) prepared in
24 connection with the transmission line;

25 (D) if required under NEPA, an environmental impact statement and
26 record of decision or a finding of no significant impact, prepared in
27 connection with the transmission line;

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- 1 (E) if preparation of a federal EA or environmental impact statement is
2 not required under NEPA in connection with the transmission line,
3 then a report, comparable to an environmental impact statement, in
4 the format prescribed in 40 C.F.R. Section 1502.10;
- 5 (F) all written federal, state, and local environmental authorizations
6 necessary to begin construction and operation of the transmission
7 line; if any such authorization cannot be obtained until after
8 construction of the transmission line, proof of application for such
9 authorization;
- 10 (G) testimony demonstrating that the transmission line will not unduly
11 impair important environmental values; important environmental
12 values include, but are not limited to, preservation of air and water
13 quality, land uses, soils, flora and fauna, and water, mineral,
14 socioeconomic, cultural, historic, religious, visual, geologic and
15 geographic resources;
- 16 (H) the expected date that the transmission line will be online;
- 17 (I) proof that the application has been served on all local authorities in
18 each county and township where the transmission line will be
19 located, the New Mexico Attorney General, the New Mexico
20 Environmental Department, and the New Mexico State Engineer;
21 and
- 22 (J) any other information, including photographs, which the applicant
23 wishes to submit in support of the application.

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1 **Q. Please identify the SPS witnesses who will address each requirement.**

2

Table BAT-1

Rule	Requirement	SPS Witness(es)
17.9.592.10(A)(1)	The location of the transmission line and a map depicting the location in electronic and physical format with a scale not to exceed one inch equals five miles.	Brooke A. Trammell, Andrea R. McArdle, Sean L. Frederiksen
17.9.592.10(A)(2)	Identification of the ownership of the land the transmission line will cross and the number of feet the transmission line will cross over each owner's land.	Sean L. Frederiksen
17.9.592.10(A)(3)	The total length of the transmission line in feet.	Sean L. Frederiksen
17.9.592.10(A)(4)	A description of interconnection facilities	Mark Lytal
17.9.592.10(A)(5)	A schematic diagram showing the transmission line and the interconnection of the transmission line to the transmission grid.	Brooke A. Trammell
17.9.592.10(B)	Identification of all applicable land use statutes and administrative regulations and proof of compliance or statement of noncompliance with each.	Sean L. Frederiksen

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17.9.592.10(C)	If required under the NEPA, an EA prepared in connection with the transmission line.	Not Applicable.
17.9.592.10(D)	If required under NEPA, an environmental impact statement and record of decision or a finding of no significant impact.	Not Applicable.
17.9.592.10(E)	If a federal environmental assesement or environmental impact statement is not required, a report, comparable to an environmental impact statement, in the format prescribed in 40 C.F.R. § 1502.10	Andrea R. McArdle
17.9.592.10(F)	All written federal, state, and local environmental authorizations necessary to begin construction and operation of the transmission line; if any such authorization cannot be obtained until after construction of the transmission line, proof of application for such authorization.	Andrea R. McArdle
17.9.592.10(G)	Testimony demonstrating that the transmission line will not unduly impair important environmental values.	Andrea R. McArdle
17.9.592.10(H)	The expected date that the transmission line will be online.	Mark Lytal

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17.9.592.10(I)	Proof that the application has been served on all local authorities in each county and township where the transmission line will be located, the New Mexico Attorney General, the New Mexico Environmental Department, and the New Mexico State Engineer.	Brooke A. Trammell
17.9.592.10(J)	Any other information, including photographs, which the applicant wishes to submit in support of the application.	Brooke A. Trammell, Andrea R. McArdle, Sean L. Frederiksen, Mark Lytal

B. LOCATION APPROVAL OF LARGE CAPACITY PLANTS

Q. Briefly describe the requirements that apply to approval of the location of Large Capacity Plants.

A. Section 62-9-3I provides that the location of a Large Capacity Plant shall be approved “unless the commission finds that the operations of the facilities for which approval is sought will not be in compliance with all applicable air and water pollution control standards and regulations existing or will unduly impair system reliability.” Section 62-9-3(G) requires that a proposed location comply with land use requirements. Rule 17.9.592.9 implements the statute and requires an applicant to provide the following.

- (A) description of the large capacity plant, including, but not limited to:

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- 1 (1) a legal description of the property upon which the large
2 capacity plant will be located;
- 3 (2) the size of the large capacity plant;
- 4 (3) fuel specifications including, but not limited to, the type of fuel
5 to be used, if applicable, and any secondary fuel capability, if
6 applicable; and
- 7 (4) a map showing the location of the large capacity plant;
- 8 (B) identification of all applicable land use statutes and administrative
9 regulations, and proof of compliance or a statement of
10 noncompliance with each;
- 11 (C) identification of all applicable air and water pollution control
12 standards and regulations, and proof of compliance or a statement
13 of noncompliance with each;
- 14 (D) all written air and water quality authorizations necessary to begin
15 construction, and necessary to begin operation, of the large
16 capacity plant; if any such authorization cannot be obtained until
17 after construction of the large capacity plant, proof of application
18 for such authorization;
- 19 (E) the expected date that the large capacity plant will be online;
- 20 (F) proof that the application has been served on all local authorities in
21 each county and township where the large capacity plant will be
22 located, the New Mexico attorney general, the New Mexico
23 environment department, and the New Mexico state engineer; and
- 24 (G) any other information, including photographs, which the applicant
25 wishes to submit in support of the application.

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1 **Q. Please identify the SPS witnesses who will address each requirement.**

2 **Table BAT-2**

Rule	Requirement	SPS Witness(es)
17.9.592.9(A)	Description of the plant, including: (1) a legal description of the property upon which the large capacity plant will be located; (2) the size of the large capacity plant; (3) fuel specifications; and (4) a map showing the location of the large capacity plant.	Brooke A. Trammell, Andrea R. McArdle, Mark Lytal
17.9.592.9(B)	Identification of all applicable land use statutes and administrative regulations, and proof of compliance or a statement of noncompliance with each.	Sean L. Frederiksen
17.9.592.9(C)	Identification of all applicable air and water pollution control standards and regulations, and proof of compliance or a statement of noncompliance with each.	Andrea R. McArdle
17.9.592.9(D)	All written air and water quality authorizations necessary to begin construction, and necessary to begin operation, of the large capacity plant; if any such authorization cannot be obtained until after construction of the large capacity plant, proof of application for such	Andrea R. McArdle

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	authorization.	
17.9.592.9(E)	The expected date that the large capacity plant will be online.	Brooke A. Trammell, Mark Lytal
17.9.592.9(F)	Proof that the application has been served on all local authorities in each county and township where the large capacity plant will be located, the New Mexico attorney general, the New Mexico environment department, and the New Mexico state engineer.	Brooke A. Trammell
17.9.592.9(G)	Any other information, including photographs, which the applicant wishes to submit in support of the application.	Brooke A. Trammell, Andrea R. McArdle, Mark Lytal

1 **VI. SPS'S COMPLIANCE WITH LOCATION APPROVAL REQUIREMENTS**

2 **Q. What topic will you discuss in this section of your testimony?**

3 A. I will describe SPS's compliance with certain requirements of the Location
4 Approval Statute and Rule for the Gen-tie line and the SPS Self-Build Projects,
5 should the Commission determine location approval is required. As set out in
6 Tables BAT-1 and BAT-2 above, SPS's other witnesses will also address various
7 components of the Location Approval Statute and Rule.

8 **A. LOCATION APPROVAL OF GEN-TIE LINE**

9 **Q. Have you provided a map that shows the location of the transmission line as**
10 **required Commission Rule 17.9.592.10.A(1)?**

11 A. Yes. Attachments BAT-2 and BAT-3 are maps that depict the project area and the
12 location of the Gen-tie line.

13 **Q. Have you provided a one-line diagram that shows the proposed electrical**
14 **connections related to the proposed 230-kV/115-kV double circuit**
15 **transmission (Gen-tie) line that will extend from SPS's Cunningham Solar**
16 **Collector Substation to its Cunningham Generating Station in Lea County,**
17 **New Mexico ("Proposed Project") as required Commission Rule**
18 **17.9.592.10.A(5)?**

Case No. 24-00 ___-UT
Direct Testimony
of
Brooke A. Trammell

1 A. Yes. Attachment BAT-4 is an electrical one-line schematic diagram that shows
2 the proposed electrical connection of the Gen-tie line to SPS's transmission
3 system.

4 **Q. When does SPS expect the Gen-Tie Line to be placed in service?**

5 A. SPS plans to place the Gen-tie line in service by October 2025.

6 **Q. Has SPS complied with the notice and service requirements under Rule**
7 **17.9.592.10?**

8 A. Yes. As shown by the certificate of service filed with its Application, SPS has
9 served a copy of its filing on the Lea County Commission, the New Mexico
10 Attorney General, the New Mexico Environmental Department and the New
11 Mexico State Engineer in accordance with Rule 17.9.592.10(I). SPS has also
12 served a copy of its filing on the Lea County Soil and Water Conservation
13 Districts. In addition, SPS will post a copy of its Application and supporting
14 direct testimony on the Xcel Energy website⁵ and will deposit a copy of its
15 Application and supporting direct testimony at the public libraries located in the
16 county seat for Lea County (i.e. Lovington (Lea County)), as well as the Hobbs
17 Public Library (Lea County) for review and examination by interested persons in
18 accordance with Rule 17.9.592.13.

⁵ Xcel Energy's website can be found at www.xcelenergy.com/company/rates_and_regulations/filings.

1 **B. LOCATION APPROVAL OF SPS SELF-BUILD PROJECTS**

2 **Q. Please provide the sizes of the SPS Self-Build Projects. (NMAC**
3 **17.9.592.9(A)(2))**

4 A. The Cunningham 1 Solar Project will be a 72 MW solar facility located on 6,442
5 acres, and the Cunningham 2 Solar Project will be a 196 MW solar facility
6 located on the same 6,442 acres. The Cunningham 1 Battery will be a 36 MW,
7 four-hour BESS system co-located on the Cunningham 1 Solar Project site's
8 6,442 acres.

9 **Q. Will the SPS Self-Build Projects have any fuel requirements? (NMAC**
10 **17.9.592.9(A)(3))**

11 A. No, the Solar Projects and BESS will not require any fuel.

12 **Q. Have you provided a map that shows the location of the SPS Self-Build**
13 **Projects? (NMAC 17.9.592.9(A)(4))**

14 A. Yes. Attachment BAT-2 is a map that shows the location of the SPS Self-Build
15 Projects. Mr. Lytal also provides a map that shows the location of the SPS Self-
16 Build Projects as attachment ML-2 to his direct testimony.

17 **Q. What are the expected dates that the SPS Self-Build Projects will be on line?**
18 **(NMAC 17.9.592.9(E))**

19 A. The expected in-service dates for the SPS Self-Build Projects are:

Case No. 24-____-UT
Direct Testimony
of
Brooke A. Trammell

- 1 • Cunningham 1 Solar Facility - April 1, 2026.
- 2 • Cunningham 2 Solar Facility - April 1, 2027
- 3 • Cunningham 1 Battery - April 1, 2026.

4 **Q. Has SPS complied with the notice and service requirements under Rule**
5 **17.9.592.9(F)?**

6 A. Yes. As discussed above, SPS has served a copy of its filing on the Lea County
7 Commission, the New Mexico Attorney General, the New Mexico Environmental
8 Department and the New Mexico State Engineer. SPS has also served a copy of
9 its filing on the Lea County Soil and Water Conservation Districts. In addition,
10 SPS will post a copy of its Application and supporting direct testimony on the
11 Xcel Energy website and will deposit a copy of its Application and supporting
12 direct testimony at the public libraries located in the county seat for Lea County
13 (i.e. Lovington (Lea County)), as well as the Hobbs Public Library (Lea County)
14 for review and examination by interested persons.

1 **VII. REQUESTS OF THE COMMISSION**

2 **Q. What are SPS's requests of the Commission?**

3 A. SPS requests:

4 (a) that the Commission issue an order resolving the threshold question of
5 whether the capacity of the SPS Self-Build Projects should be aggregated
6 for purposes of the Location Approval Statute and Rule;

7 (b) that, if the Commission determines that the capacity of the SPS Self-Build
8 Projects should be aggregated such that location approval is required, that
9 the Commission issue an order:

10 a. granting location approval of the Gen-tie line and associated facilities;

11 and

12 b. granting location approval of the SPS Self-Build Projects; and

13 (c) that the Commission issue a decision in this matter within 60 days after
14 notice is given if no protest is filed, or if a protest is filed, within 90 days
15 of the Commission's final decision in Case No. 23-00252-UT.

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

17 A. Yes.

BEFORE THE NEW MEXICO PUBLIC REGULATION COMMISSION

IN THE MATTER OF SOUTHWESTERN)
PUBLIC SERVICE COMPANY'S)
APPLICATION REQUESTING A)
DETERMINATION ON LOCATION)
APPROVAL OF TWO SOLAR FACILITIES, A)
BATTERY ENERGY STORAGE SYSTEM,)
AND A 230 KV TRANSMISSION)
GENERATION TIE LINE IN LEA COUNTY)
AND OTHER ASSOCIATED RELIEF,) **CASE NO. 24-00____-UT**
)
SOUTHWESTERN PUBLIC SERVICE)
COMPANY,)
)
APPLICANT.)
)
)

VERIFICATION

On this day, March 28, 2024, I, Brooke A. Trammell, swear and affirm under penalty of perjury under the law of the State of New Mexico, that my testimony contained in Direct Testimony of Brooke A. Trammell is true and correct.

/s/ Brooke A. Trammell

Brooke A. Trammell

Southwestern Public Service Company

Prior Cases

No.	Case Description	Regulatory Agency	Company
PUCT Docket No. 55973	<i>Application Of Southwestern Public Service Company For Authority To Reconcile Fuel And Purchased Power Costs For The Period July 1, 2021 Through June 30,2023</i>	Public Utility Commission of Texas	SPS
PUCT Docket No. 55849	<i>Application of Southwestern Public Service Company for Review and Approval of Purchased Power Agreements Pursuant to Public Utility Regulatory Act § 36.205</i>	Public Utility Commission of Texas	SPS
NMPRC Case No. 23-00384-UT	<i>In the Matter of Southwestern Public Service Company's Application Requesting Approval of Two Long Term Purchased Power Agreements</i>	New Mexico Public Regulation Commission	SPS
NMPRC Case No. 23-00271-UT	<i>In the Matter of Southwestern Public Service Company's Application for Authorization of Large Customer Renewable*Connect Program and Tariff and Other Associated Relief</i>	New Mexico Public Regulation Commission	SPS
PUCT Docket No. 55255	<i>Application of Southwestern Public Service Company to Amend Its Certificate of Convenience and Necessity to Construct Generation Facilities in Lamb County, Texas and Lea County, New Mexico; for Good-Cause Exceptions; and for Related Relief</i>	Public Utility Commission of Texas	SPS
NMPRC Case No. 23-00252-UT	<i>In the Matter of Southwestern Public Service Company's Application Requesting: (1) Issuance of a Certificate of Public Convenience and Necessity to Construct and Operate Solar Generation and Battery Storage Projects and Associated Facilities; (2) Authorization of Related Ratemaking Principles Including Accrual of an Allowance for Funds Used During Construction; (3) Authorization to Abandon the Cunningham Unit 2 Generating Facility; and (4) Other Associated Relief</i>	New Mexico Public Regulation Commission	SPS
PUCT Docket No. 54952	<i>Application of Southwestern Public Service Company to Revise its Fuel Factor Formula; Interim Approval; and for Related Relief</i>	Public Utility Commission of Texas	SPS
PUCT Docket No. 54634	<i>Application of Southwestern Public Service Company for Authority to Change Rates</i>	Public Utility Commission of Texas	SPS
NMPRC Case No. 22-00286-UT	<i>In the Matter of Southwestern Public Service Company's Application for: (1) Revision of Its Retail Rates Under Advice Notice No. 312; (2) Authority to Abandon the Plant X Unit 1, Plant X Unit 2, and Cunningham Unit 1 Generation Stations and Amend the Abandonment Date of the Tolk Generating Station; and (3) Other Associated Relief</i>	New Mexico Public Regulation Commission	SPS
PUCT Docket No. 53034	<i>Application of Southwestern Public Service Company to Reconcile Fuel and Purchased Power Costs for the Period July 1, 2018 through June 30, 2021</i>	Public Utility Commission of Texas	SPS
PUCT Docket No. 53529	<i>Application of the City of Lubbock, Acting By and Through Lubbock Power & Light, for Authority to Connect the Remaining Portion of its Load with the Electric Reliability Council of Texas and for Approval of Settlement Agreement</i>	Public Utility Commission of Texas	SPS
NMPRC Case No. 22-00178-UT	<i>In the Matter of Southwestern Public Service Company's Application for Authorization to Implement Grid Modernization Components that Include Advanced Metering Infrastructure and Recover the Associated Costs through a Rider, Issuance of Related Accounting Orders, and Other Associated Relief</i>	New Mexico Public Regulation Commission	SPS
CPUC Proceeding No. 22AL-0046G	<i>In the Matter of Advice No. 993 - Gas of Public Service Company of Colorado to Revise its Colorado P.U.C. No. 6 - Gas Tariff to Increase Jurisdictional Base Rate Revenues, Implement New Base Rates for All Gas Rate Schedules, and Make Other Proposed Tariff Changes Effective February 24, 2022</i>	Colorado Public Utilities Commission	PSCo
CPUC Proceeding No. 21A-0298E	<i>In the Matter of the Application of Public Service Company of Colorado for Certificates of Public Convenience and Necessity for Interconnection Facilities and Network Upgrades Associated with the Colorado Energy Plan Portfolio</i>	Colorado Public Utilities Commission	PSCo
CPUC Proceeding No. 21A-0472G	<i>In the Matter of the Application of Public Service Company of Colorado for a Certificate of Public Convenience and Necessity for the West Metro Gas Project</i>	Colorado Public Utilities Commission	PSCo

Southwestern Public Service Company

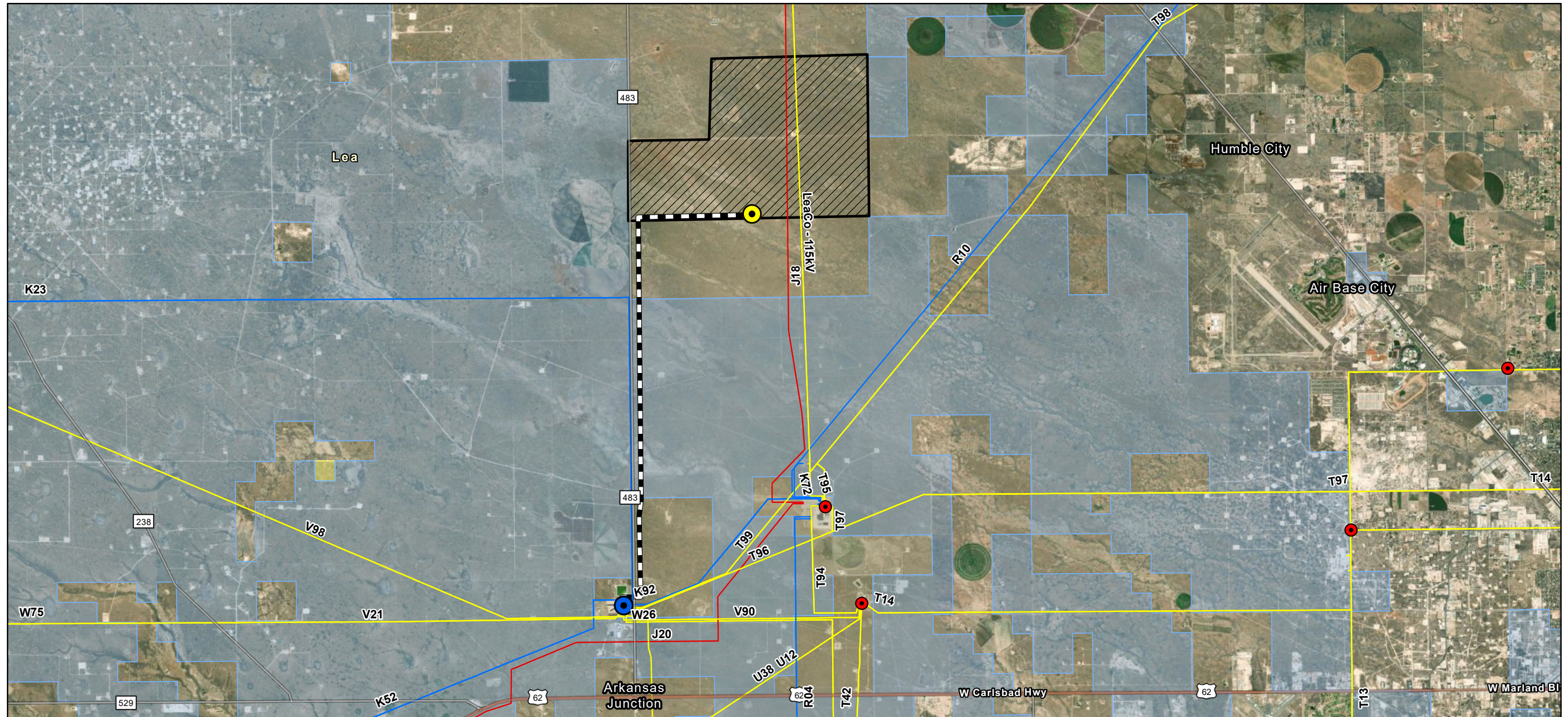
Prior Cases

No.	Case Description	Regulatory Agency	Company
CPUC Proceeding No. 21A-0071G	<i>In the Matter of the Verified Application of Public Service Company of Colorado for Approval to Extend the Company's Pipeline System Integrity Adjustment ("PSIA") Rider for Certain Projects Through 2024, with Subsequent Wind-Down of the Rider</i>	Colorado Public Utilities Commission	PSCo
CPUC Proceeding No. 21A-0370E	<i>In the Matter of the Application of Public Service Company of Colorado for an Order Approving Expenses Incurred for the Period January 2020 through December 2020 that are Recovered Through the Electric Commodity Adjustment and Approving of the Calculation of 2020 Short Term Sales Margins</i>	Colorado Public Utilities Commission	PSCo
CPUC Proceeding No. 21AL-0317E	<i>In the Matter of Advice Letter No. 1857 - Electric filed by Public Service Company of Colorado to Revise its Colorado P.U.C. No. 8 - Electric Tariff to Revise Jurisdictional Base Rate Revenues, Implement New Base Rates for All Electric Rate Schedules, and Make Other Proposed Tariff Changes to Become Effective August 2, 2021</i>	Colorado Public Utilities Commission	PSCo
CPUC Proceeding No. 21A-0279E	<i>In the Matter of the Application of Public Service Company of Colorado for Approval to Amend the Certificate of Public Convenience and Necessity for its Advanced Grid Intelligence and Security (AGIS) Initiative</i>	Colorado Public Utilities Commission	PSCo
CPUC Proceeding No. 21A-0203ST	<i>In the Matter of The Application of Public Service Company of Colorado for Recovery of Costs Associated with the February 2021 Extreme Weather Event for its Steam Utility</i>	Colorado Public Utilities Commission	PSCo
CPUC Proceeding No. 21A-0192EG	<i>In the Matter of the Application of Public Service Company of Colorado for Recovery of Costs Associated with the February 2021 Extreme Weather Event for its Electric and Gas Utilities</i>	Colorado Public Utilities Commission	PSCo
CPUC Proceeding No. 21A-0141E	<i>In the Matter of the Application of Public Service Company of Colorado for Approval of its 2021 Electric Resource Plan and Clean Energy Plan</i>	Colorado Public Utilities Commission	PSCo
CPUC Proceeding No. 21A-0096E	<i>In the Matter of the Application of Public Service Company of Colorado for a Certificate of Public Convenience and Necessity for Colorado's Power Pathway 345 kV Transmission Project and Associated Findings Regarding Noise and Magnetic Field Reasonableness</i>	Colorado Public Utilities Commission	PSCo
CPUC Proceeding No. 20AL-0432E	<i>In the Matter of Advice No. 1835 - Electric of Public Service Company of Colorado to Revise its Colorado P.U.C. No. 8 - Electric Tariff to Eliminate the Currently Effective General Rate Schedule Adjustments to Place into Effect Revised Base Rates and Other Phase II Tariff Proposals to Become Effective November 19, 2020</i>	Colorado Public Utilities Commission	PSCo
CPUC Proceeding No. 20A-0082E	<i>In the Matter of the Application of Public Service Company of Colorado for a Certificate of Public Convenience and Necessity for the High Point Substation Project</i>	Colorado Public Utilities Commission	PSCo
CPUC Proceeding No. 20A-0327E	<i>In the Matter of the Application of Public Service Company of Colorado for an Order Approving Expenses Incurred for the Period January 2019 through December 2019 that are Recovered through the Electric Commodity Adjustment and Approving of the Calculation of 2019 Short Term Sales Margins</i>	Colorado Public Utilities Commission	PSCo
CPUC Proceeding Nos. 19A-0728E 20A-0063E (consolidated)	<i>In the Matter of the Application of Public Service Company of Colorado for a Certificate of Public Convenience and Necessity for the Voltage Control Facilities Associated with the Colorado Energy Plan</i> <i>In the Matter of the Application of Public Service Company of Colorado for a Certificate of Public Convenience and Necessity for the Greenwood to Denver Terminal 230 kV Transmission Project Associated with the Colorado Energy Plan, Associated Findings of Noise and Magnetic Field Reasonableness, and Uprate Projects</i>	Colorado Public Utilities Commission	PSCo
CPUC Proceeding No. 19A-0225E	<i>In the Matter of the Application of Public Service Company of Colorado for Approval of its Community Resiliency Initiative Pursuant to § 40-2-203(4), C.R.S.</i>	Colorado Public Utilities Commission	PSCo
CPUC Proceeding No. 20AL-0049G	<i>In the Matter of Advice No. 961 - Gas of Public Service Company of Colorado to Revise its Colorado P.U.C. No. 6 - Gas Tariff to Increase Jurisdictional Base Rate Revenues, Implement New Base Rates for All Gas Rate Schedules, and Make Other Proposed Tariff Changes Effective March 7, 2020</i>	Colorado Public Utilities Commission	PSCo

Southwestern Public Service Company

Prior Cases

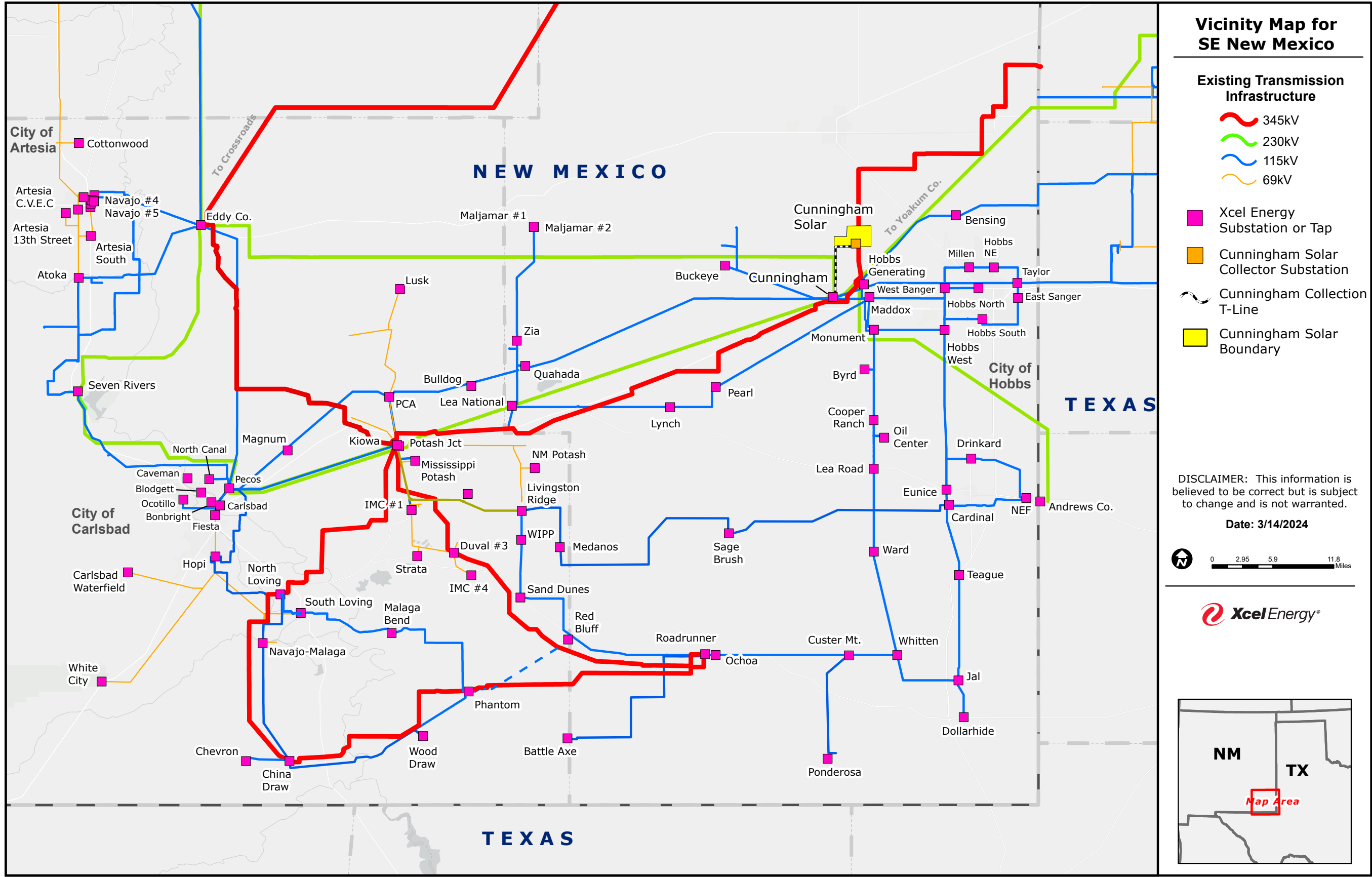
No.	Case Description	Regulatory Agency	Company
CPUC Proceeding No. 20A-0300E	<i>In the Matter of the Application of Public Service Company of Colorado for Approval of Wildfire Mitigation Plan and Wildfire Protection Rider</i>	Colorado Public Utilities Commission	PSCo
CPUC Proceeding No. 19A-0425E	<i>In the Matter of the Application of Public Service Company of Colorado for an Order Approving Expenses Incurred for the Period January 2018 Through December 2018 that are Recovered Through the Electric Commodity Adjustment and Approving the Calculation of 2018 Short Term Sales Margins</i>	Colorado Public Utilities Commission	PSCo
CPUC Proceeding No. 19AL-0687E	<i>In the Matter of Advice Letter No. 1814 - Electric of Public Service Company of Colorado to Revise its Colorado P.U.C. No. 8 - Electric Tariff to Reflect a Modified Schedule RE-TOU and Related Tariff Changes to be Effective on Thirty-Days' Notice</i>	Colorado Public Utilities Commission	PSCo
CPUC Proceeding No. 19AL-0309G	<i>In the Matter of Advice No. 949 - Gas Filed by Public Service Company of Colorado to Revise its Colorado P.U.C. No. 6 - Gas Tariff to Reflect Revised Rates and Rate Schedules, Revise its Transportation Tariff, and Make Other Proposed Tariff Changes to be Effective on Thirty-Days' Notice</i>	Colorado Public Utilities Commission	PSCo
CPUC Proceeding No. 19AL-0268E	<i>In the Matter of Advice No. 1797 - Electric of Public Service Company of Colorado to Revise its Colorado P.U.C. No. 8 - Electric Tariff to Implement Rate Changes Effective on Thirty-days' Notice</i>	Colorado Public Utilities Commission	PSCo
CPUC Proceeding No. 18A-0905E	<i>In the Matter of the Application of Public Service Company of Colorado for Approval of the 500 MW Cheyenne Ridge Wind Project, a Certificate of Public Convenience and Necessity for the Cheyenne Ridge Wind Farm, and a Certificate of Public Convenience and Necessity for the 345 kV Generation Tie Line and Associated Findings of Notice and Magnetic Field Reasonableness</i>	Colorado Public Utilities Commission	PSCo
CPUC Proceeding No. 17AL-0363G	<i>In the Matter of Advice Letter No. 912 - Gas Filed by Public Service Company of Colorado to Revise its Colorado P.U.C. No. 6-Gas Tariff to Implement a General Rate Schedule Adjustment and Other Rate Changes Effective on 30-Days Notice</i>	Colorado Public Utilities Commission	PSCo
CPUC Proceeding No. 18M-0401E	<i>In the Matter of the Commission's Consideration of the Revised Stipulation and Settlement Agreement Regarding the Incorporation of the Impacts of the Tax Cut and Jobs Act of 2017 Into the Rates of Public Service Company of Colorado for Electric Service</i>	Colorado Public Utilities Commission	PSCo
PUCT Docket No. 44498	<i>Review of Rate Case Expenses Incurred by Southwestern Public Service Company and Municipalities in Docket No. 43695</i>	Public Utility Commission of Texas	SPS
PUCT Docket No. 45560	<i>Application of Southwestern Public Service Company for Authority to Refund Remaining Gain-on-Sale Amounts Associated with Docket Nos. 41430 and 44671</i>	Public Utility Commission of Texas	SPS
PUCT Docket No. 42004	<i>Application of Southwestern Public Service Company for Authority to Change Rates and Reconcile Fuel and Purchased Power Costs for the Period of July 1, 2012 through June 30, 2013</i>	Public Utility Commission of Texas	SPS
PUCT Docket No. 39362	<i>Texas-New Mexico Power Company Request for Approval to Adjust the Energy Efficiency Cost Recovery Factor (EECRF) and Related Relief</i>	Public Utility Commission of Texas	TNMP
PUCT Docket No. 39362	<i>Texas-New Mexico Power Company Request for Approval to Adjust the Energy Efficiency Cost Recovery Factor (EECRF)</i>	Public Utility Commission of Texas	TNMP
CPUC Proceeding No. 20A-0375E	<i>In the Matter of the Application of Public Service Company of Colorado for Approval of the PPA Termination Agreement with KEPCO Solar of Alamosa, LLC and Authority to Establish a Regulatory Asset and Recover Costs Associated with the PPA Termination Agreement through the Electric Commodity Adjustment</i>	Colorado Public Utilities Commission	PSCo



SPS Transmission	Project
69kV	SPS Existing Substation
115kV	Cunningham Solar Collection Station
230kV	Cunningham Generation Substation
345kV	Cunningham Solar Generation Tie Line
BLM Land	Cunningham Solar
NMSL Land	

Cunningham Solar

Proposed Project Map



Vicinity Map for SE New Mexico

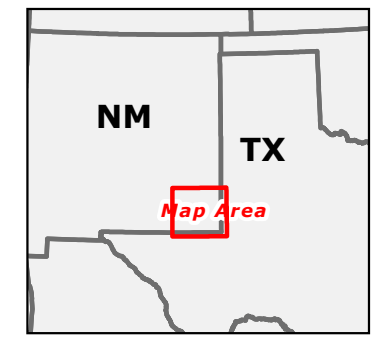
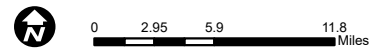
Existing Transmission Infrastructure

- 345kV
- 230kV
- 115kV
- 69kV

- Xcel Energy Substation or Tap
- Cunningham Solar Collector Substation
- ~ Cunningham Collection T-Line
- Cunningham Solar Boundary

DISCLAIMER: This information is believed to be correct but is subject to change and is not warranted.

Date: 3/14/2024

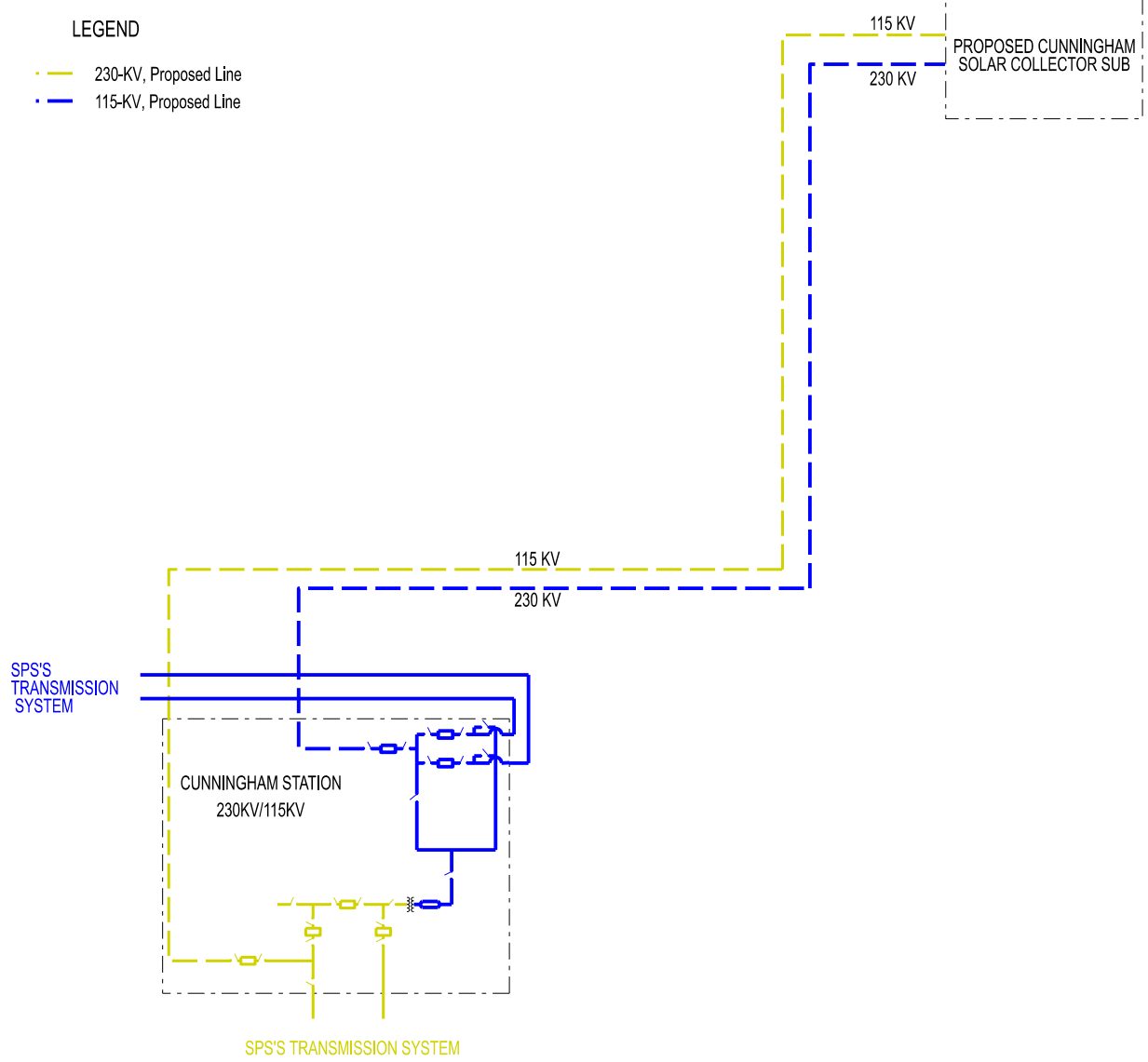


CNST SOLAR.DGN

One Line Diagram for the Proposed Project
 •For illustration purposes only - not to scale and not for construction.
 •Substation diagrams are simplified to show only the major system
 •Components related to the proposed project.
 The proposed 230/115KV lines shown do not represent a routing proposal.

LEGEND

- 230-KV, Proposed Line
- 115-KV, Proposed Line



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One-line Electrical Schematic Diagram
 for Proposed Project - Interconnection of new
 230-kV/115-kV double circuit transmission
 (Gen-tie)line to SPS's transmission system.



SCALE

REV

BEFORE THE NEW MEXICO PUBLIC REGULATION COMMISSION

IN THE MATTER OF SOUTHWESTERN)	
PUBLIC SERVICE COMPANY’S)	
APPLICATION REQUESTING A)	
DETERMINATION ON LOCATION)	
APPROVAL OF TWO SOLAR FACILITIES, A)	
BATTERY ENERGY STORAGE SYSTEM,)	
AND A 230 KV TRANSMISSION)	
GENERATION TIE LINE IN LEA COUNTY)	
AND OTHER ASSOCIATED RELIEF,)	CASE NO. 24-_____-UT
)	
SOUTHWESTERN PUBLIC SERVICE)	
COMPANY,)	
)	
APPLICANT.)	
)	
)	

CERTIFICATE OF SERVICE

I certify that a true and correct copy of *Southwestern Public Service Company’s Application and the Direct Testimony of Brooke A. Trammell, Mark Lytal, Sean L. Frederiksen and Andrea R. McArdle* was electronically sent to each of the following on this 28th day of March 2024:

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Tyler Crespin	Tyler.Crespin@prc.nm.gov;
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Respectfully submitted,
/s/ Cindy Baeza
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