

BEFORE THE NEW MEXICO PUBLIC REGULATION COMMISSION

**IN THE MATTER OF SOUTHWESTERN)
PUBLIC SERVICE COMPANY'S)
ANNUAL 2021 RENEWABLE ENERGY)
PORTFOLIO PROCUREMENT PLAN)
AND REQUESTED APPROVALS)
THEREIN; PROPOSED 2021)
RENEWABLE PORTFOLIO STANDARD)
COST AND RECONCILIATION)
RIDERS; APPLICATION FOR AN RPS)
INCENTIVE; AND OTHER)
ASSOCIATED RELIEF,)
)
)
)
)
SOUTHWESTERN PUBLIC SERVICE)
COMPANY,)
)**

CASE NO. 20-00xxx-UT

APPLICANT.

DIRECT TESTIMONY

of

RICHARD M. LUTH

on behalf of

SOUTHWESTERN PUBLIC SERVICE COMPANY

July 1, 2020

TABLE OF CONTENTS

GLOSSARY OF ACRONYMS AND DEFINED TERMS..... iii
LIST OF ATTACHMENTS iv
I. WITNESS IDENTIFICATION AND QUALIFICATIONS 1
II. TESTIMONY – SUMMARY, PURPOSE, AND RECOMMENDATIONS..... 5
III. 2021 RPS RIDER RATE CALCULATION..... 7
IV. 2021 RPS RECONCILIATION RIDER..... 10
VERIFICATION..... 14

GLOSSARY OF ACRONYMS AND DEFINED TERMS

<u>Acronym/Defined Term</u>	<u>Meaning</u>
Commission	New Mexico Public Regulation Commission
ETA	Energy Transition Act
kV	kilovolt
kW	kilowatt
kWh	kilowatt-hour
LCC	Large Customer Cap
RPS	Renewable Portfolio Standard
SPS	Southwestern Public Service Company, a New Mexico corporation

LIST OF ATTACHMENTS

<u>Attachment</u>	<u>Description</u>
RML-1	Proposed RPS Cost Rider Tariff
RML-2	Calculation of 2021 RPS Cost Rider
RML-3	Proposed RPS Reconciliation Rider Tariff
RML-4	Calculation of 2021 RPS Reconciliation Rider
RML-5	Bill Impacts with Change in RPS Rates

Case No. 20-00xxx-UT
Direct Testimony
of
Richard M. Luth

1 **I. WITNESS IDENTIFICATION AND QUALIFICATIONS**

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

3 A. My name is Richard M. Luth. My business address is 790 S. Buchanan Street,
4 Amarillo, Texas 79101.

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

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

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

10 A. I am employed by SPS as Manager, Pricing and Planning in the Regulatory
11 Administration Department.

12 **Q. Please briefly outline your responsibilities as Manager, Pricing and Planning.**

13 A. I am responsible for the preparation of electric cost allocation studies and the
14 development and design of retail electric rates and tariffs for SPS. Those
15 responsibilities include development of rates, terms, and conditions for proposed
16 service contracts, and the analysis of various other regulatory and business issues
17 for SPS.

Case No. 20-00xxx-UT
Direct Testimony
of
Richard M. Luth

1 **Q. Please describe your educational background.**

2 A. I graduated from Illinois State University in 1983, with a Bachelor of Science in
3 Accounting.

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

5 A. I have been employed by SPS and its affiliated companies since April 2008. Prior
6 to that, I had been a Rates Analyst and Economic Analyst with the Illinois
7 Commerce Commission since October 1990. At the Illinois Commerce
8 Commission, I reviewed cost-of-service, rates, and other matters involving the
9 regulation of investor-owned public utilities.

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

12 A. Yes. I attended and completed the Edison Electric Institute's Electric Rates
13 Advanced course. In addition, I have attended numerous courses and seminars
14 hosted by the Illinois State University Institute for Regulatory Policy Studies.

Case No. 20-00xxx-UT
Direct Testimony
of
Richard M. Luth

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

2 A. Yes. I have filed testimony on behalf of SPS in numerous cases before the New
3 Mexico Public Regulation Commission (“Commission”) regarding cost
4 allocation, rate design, and tariff issues, including SPS’s last seven base rate
5 cases, which include Case Nos. 19-00170-UT,¹ 17-00255-UT,² 16-00269-UT,³
6 15-00296-UT,⁴ 12-00350-UT,⁵ 10-00395-UT,⁶ and 08-00354-UT.⁷ I have filed
7 testimony on behalf of SPS in past Renewable Portfolio Standard (“RPS”) cases,

¹ *In the Matter of Southwestern Public Service Company’s Application for (1) Revision of its Retail Rates Under Advice Notice No. 282; (2) Authorization and Approval to Shorten the Service Life of and Abandon its Told Generating Station Units; and (3) Other Relate Relief*, Case NO. 19-00170-UT.

² *In the Matter of Southwestern Public Service Company’s Application for Revision of its Retail Rates under Advice Notice No. 272*, Case No. 17-00255-UT.

³ *In the Matter of Southwestern Public Service Company’s Application for Revision of its Retail Rates under Advice Notice No. 265*, Case No. 16-00269-UT, Final Order Partially Adopting Recommended Decision and Dismissing and Ordering SPS to Re-file Application (Apr. 19, 2017).

⁴ *In the Matter of Southwestern Public Service Company’s Application for Revision of its Retail Rates under Advice Notice No. 258*, Case No. 15-00296-UT, Final Order Adopting Certification of Stipulation (Aug. 10, 2016).

⁵ *In the Matter of Southwestern Public Service Company’s Application for Revision of its Retail Rates under Advice Notice No. 245 and All Associated Approvals*, Case No. 12-00350-UT, Final Order Partially Approving Recommended Decision (Mar. 27, 2014).

⁶ *In the Matter of Southwestern Public Service Company’s Application for Revision of its Retail Rates under Advice Notice No. 234*, Case No. 10-00395-UT, Final Order Adopting Amended Certification of Stipulation (Dec. 28, 2011).

⁷ *In the Matter of the Application of Southwestern Public Service Company for Revision of its Retail Electric Rates Pursuant to Advice Notice Nos. 217, 218 and 219 and Request for Expedited Interim Relief Authorizing Recovery of Capacity Related Costs Associated With the New Hobbs Generating Station*, Case No. 08-00354-UT, Final Order Conditionally Approving Stipulation (Jul. 14, 2009).

Case No. 20-00xxx-UT
Direct Testimony
of
Richard M. Luth

1 including Case No. 19-00134-UT⁸ that established the currently-effective RPS
2 Cost Rider and RPS Reconciliation Rider. I have also testified on behalf of SPS
3 in numerous cases before the Public Utility Commission of Texas on similar
4 matters. Finally, before joining SPS, I testified before the Illinois Commerce
5 Commission on numerous occasions on various cost allocation, rate design, and
6 tariff issues.

⁸ *In the Matter of Southwestern Public Service Company's Application Requesting :(1) Acknowledgment of its Filing of the 2018 Annual Renewable Energy Portfolio Report; (2) Approval of its Annual Renewable Energy Portfolio Procurement Plan for Plan Year 2020; (3) Approval of the Proposed Rate for its 2020 Renewable Portfolio Standard Rider; and (5) Other Associated Relief,*

Case No. 20-00xxx-UT
Direct Testimony
of
Richard M. Luth

1 **II. TESTIMONY – SUMMARY, PURPOSE, AND RECOMMENDATIONS**

2 **Q. What is your assignment in this proceeding?**

3 A. My testimony supports SPS’s calculation of the 2021 RPS Rider rate and the 2021
4 RPS Reconciliation Rider rate.

5 **Q. Please summarize the conclusions reached in your testimony.**

6 A. In accordance with the Final Order in Case No. 12-00350-UT,⁹ the projected costs
7 for 2021 result in a 2021 RPS Rider of \$0.002217 per kilowatt-hour (“kWh”) for
8 all New Mexico retail customers, other than kWh purchased under a voluntary
9 program for purchasing renewable energy (i.e., Solar*Connect). As a result of the
10 elimination of the large customer cap (“LCC”) under the Energy Transition Act
11 (“ETA”) and as approved in Case No. 19-00134-UT, SPS has calculated an
12 additional rate rider (RPS Reconciliation Rider) to appropriately credit customers
13 in 2021 for the true-up of amounts associated with prior periods when the LCC
14 was in effect. The 2021 RPS Reconciliation Rider credit of \$0.000801 per kWh

⁹ Case No. 12-00350-UT, *In the Matter of Southwestern Public Service Company’s Application for Revision of its Retail Electric Rates Under Advice Notice No. 245*, Final Order Partially Adopting Recommended Decision (Mar. 26, 2014).

Case No. 20-00xxx-UT
Direct Testimony
of
Richard M. Luth

1 will apply to all customers, excluding customers previously considered Large
2 Qualifying Customers.

3 **Q. Do you co-sponsor any sections of the RPS Plan presented by SPS witness**
4 **Ruth M. Sakya?**

5 A. Yes. I co-sponsor Section II(C) and Appendices B and C, concerning the
6 proposed 2021 RPS Rider and the proposed 2021 RPS Reconciliation Rider.

7 **Q. Were Attachments RML-1 through RML-5 prepared by you or under your**
8 **direct supervision and control?**

9 A. Yes.

III. 2021 RPS RIDER RATE CALCULATION

1 **Q. Please describe how SPS determined the 2021 RPS Rider rate.**

2 A. To determine the 2021 RPS Rider rate, I divided the 2021 RPS Rider revenue
3 requirement that was provided by Ms. Sakya (\$17,252,659; Attachment RML-2,
4 line no. 1) by the net of: 1) projected kWh sales for the Plan Year for all New
5 Mexico retail customers, 2) less projected kWh sales under SPS's voluntary
6 program for purchasing renewable energy (i.e., Solar*Connect) (Attachment
7 RML-2, line nos. 2-4).

8 **Q. What is SPS's proposed 2021 RPS Rider rate and how does it compare to the**
9 **2020 RPS Rider rate?**

10 A. The proposed 2021 RPS Rider rate is \$0.002217 per kWh (Attachment RML-1,
11 and Attachment RML-2, line no. 5) for all New Mexico customer classes other
12 than kWh purchased under a voluntary program for renewable energy. The 2020
13 RPS Rider rate of \$0.000370 per kWh went into effect on May 1, 2020 and is
14 applicable through December 31, 2020. There are two reasons why the proposed
15 rate is higher.

16 First, the RPS Rider rate that was in effect from January 1, 2020 through
17 April 30, 2020 was \$0.003888 per kWh; more than 10 times the rate that is

Case No. 20-00xxx-UT
Direct Testimony
of
Richard M. Luth

1 currently in effect. Therefore, RPS cost recovery in the first four months of 2020
2 represents more than 60% of the \$15.2 million estimated for recovery through the
3 RPS Rider in 2020 from Case No. 19-00134-UT. The rate for May 1 through
4 December 31, 2020 is much lower because it is calculated net of the relatively
5 high level of revenues recovered during the first part of 2020 billed under the
6 then-approved RPS Rider Rate of \$0.003888.

7 Second, the calculation of the \$0.003888 rate per kWh included the limit
8 on renewable portfolio standard charges to customers that have 10 million or
9 more kWh in electric usage during a calendar year. However, that limit is no
10 longer in effect due to the amendments to the Renewable Energy Act (Sections
11 62-16-1 through 62-16-10, NMSA 1978 (2019)) by the ETA. As a result, the
12 RPS Rider rate of \$0.003888 in effect before May 1, 2020 was considerably
13 higher than the current rate because it was based upon kWh billing determinants
14 that did not include large customer kWh. The kWh billing determinants would
15 have been considerably higher had large customer kWh been included in RPS cost
16 recovery for the period prior to May 1, 2020. The proposed 2021 RPS Rider rate
17 of \$0.002217 per kWh is based upon kWh billing determinants that include large

Case No. 20-00xxx-UT
Direct Testimony
of
Richard M. Luth

1 customer kWh, and will apply to the full 2021 calendar year, providing a more
2 levelized rate than customers have experienced in 2020.

3 **Q. Have you provided a draft of the revised RPS Cost Rider?**

4 A. Yes. Attachment RML-1 is a copy of the Eighth Revised Rate No. 70 with the
5 proposed 2021 RPS Cost Rider. SPS has filed an advice notice and the rate tariffs
6 with its Application.

Case No. 20-00xxx-UT
Direct Testimony
of
Richard M. Luth

1 **IV. 2021 RPS RECONCILIATION RIDER**

2 **Q. Please describe the RPS Reconciliation Rider that was approved in Case No.**
3 **19-00134-UT.**

4 A. The RPS Reconciliation Rider appropriately credits customers in 2021 for the
5 true-up of amounts associated with prior periods when the LCC was in effect (i.e.,
6 an over-recovery). As described in Case No. 19-00134-UT, large customers did
7 not contribute to an over-recovery of RPS costs during periods when the LCC was
8 in effect. Consistent with the current RPS Reconciliation Rider, the proposed
9 RPS Reconciliation Rider will apply to customers other than large customers as
10 previously defined by Renewable Energy Rule 17.9.572 NMAC prior to the ETA.

11 **Q. Please describe the reconciliation of the 2019 RPS Rider.**

12 A. As discussed in Ms. Sakya's direct testimony and as indicated in Attachment
13 RMS-2, Appendix E to Ms. Sakya's direct testimony, 2019 RPS Cost Rider
14 revenue totaled \$19,002,248 compared to \$15,715,855 in RPS Costs, for an over-
15 recovery of \$3,286,393. The amount of the over-recovery, as well as \$81,458¹⁰ in

¹⁰ Interest is based upon the 2019 rate paid on customer deposits, as determined by the Commission.

Case No. 20-00xxx-UT
Direct Testimony
of
Richard M. Luth

1 interest on the 2019 Rider over-recovery, are provided in Attachment RMS-4,
2 page 1, line nos. 1-3 to Ms. Sakya's direct testimony.

3 **Q. What is the reconciliation rate?**

4 A. As contained in Attachment RML-3, the 2021 rate for the reconciliation of the
5 2019 RPS Cost Rider is a credit of \$0.000801 per kWh. The credit is based upon
6 the 2019 over-recovery of RPS costs, including interest – for a total of
7 (\$3,367,851), divided by projected 2021 kWh sales to customers other than large
8 customers. Please refer to Attachment RML-4.

9 **Q. What is the bill impact for each customer class, considering both the**
10 **proposed 2021 RPS Rider and the proposed 2021 RPS Reconciliation Rider?**

11 A. Bill impacts for each customer class over the course of the year are shown below.
12 Please refer to Attachment RML-5 for the calculations and other usage levels for
13 each customer class.

- 14 • The total bill to a Residential Service customer using 750 kWh per month
15 would be \$79.45 under the proposed 2021 RPS Rider, compared to \$78.49
16 under the current RPS Rider (an increase of 1.22% of total bill).
- 17 • A Small General Service customer using 1,000 kWh per month would be
18 charged \$91.62 over the course of the year under the proposed Rider,
19 compared to \$90.34 under the current RPS Rider (an increase of 1.42% of
20 total bill).

Case No. 20-00xxx-UT
Direct Testimony
of
Richard M. Luth

- 1 • A Secondary General Service customer using 15,000 kWh of energy and
2 35 kilowatts (“kW”) of demand a month would be charged \$1,045.30
3 under the proposed Rider, compared to \$1,026.10 under the current RPS
4 Rider (an increase of 1.87% of total bill).
- 5 • An Irrigation Service customer using 7,500 kWh of energy and 35 kW of
6 demand a month would be charged \$633.44 under the proposed Rider,
7 compared to \$623.84 under the current Rider (an increase of 1.54% of
8 total bill).
- 9 • A Primary General Service customer using 15,000 kWh of energy and 35
10 kW of demand a month would be charged \$954.80 under the proposed
11 Rider, compared to \$935.60 under the current Rider (an increase of 2.05%
12 of total bill).
- 13 • A Large General Service - Transmission 69 kilovolt (“kV”) customer
14 using 4,000,000 kWh of energy and 6,100 kW of demand a month would
15 be charged \$156,320.01 under the proposed Rider, compared to
16 \$150,119.11 under the current Rider (an increase of 4.13% of the total
17 bill).
- 18 • A Large General Service - Transmission 115+ kV customer using
19 4,000,000 kWh of energy and 6,300 kW of demand a month would be
20 charged \$158,021.44 under the proposed Rider, compared to \$151,854.56
21 under the current Rider (an increase of 4.06% of total bill).
- 22 • A Large Municipal and School Service customer using 20,000 kWh of
23 energy and 45 kW of demand a month would be charged \$1,135.76 under
24 the proposed rider, compared to \$1,110.17 under the current Rider (an
25 increase of 2.31% of total bill).
- 26 • A Small Municipal and School Service customer using 1,000 kWh of
27 energy per month would be charged \$81.57 under the proposed rider,
28 compared to \$80.29 under the current Rider (an increase of 1.59% of total
29 bill).

Case No. 20-00xxx-UT
Direct Testimony
of
Richard M. Luth

1 **Q. Have you provided a draft of the revised RPS Reconciliation Rider?**

2 A. Yes. Attachment RML-3 is a copy of First Revised Rate No. 77 with the
3 proposed 2021 RPS Reconciliation Rider. SPS has filed an advice notice and the
4 rate tariffs with its Application.

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

6 A. Yes.

VERIFICATION

On this day, June 30, 2020, I, Richard M. Luth, swear and affirm under penalty of perjury under the law of the State of New Mexico, that my testimony contained in Direct Testimony of Richard M. Luth is true and correct.

/s/ Richard M. Luth _____
RICHARD M. LUTH

SOUTHWESTERN PUBLIC SERVICE COMPANY

EIGHTH REVISED RATE NO. 70
CANCELING SEVENTH REVISED RATE NO. 70

RPS COST RIDER

X

APPLICABLE: This rate rider is applicable to bills for electric service provided under all of SPS's retail rate schedules.

TERRITORY: Area served by Company in New Mexico.

RATE: The rate is applied to each kWh used per month to each customer class listed below other than kWh purchased under Rate Rider 33 or Rate Rider 76. **X**

CUSTOMER CLASS:	\$/kWh	
Residential Service, Residential Heating Service, Small General Service, Small Municipal and School Service, Municipal Street Lighting Service, Area Lighting Service	\$0.002217	X
Secondary General Service, Irrigation Power Service, Large Municipal and School Service	\$0.002217	X
Primary General Service	\$0.002217	X
Large General Service – Transmission	\$0.002217	X

Renewable energy costs recovered through this rider are approved for recovery by the Commission. Company will reconcile costs previously approved for recovery through this Rider. Over-recovery of previously approved renewable energy costs will represent a credit to and reduction of approved renewable energy costs recoverable over a future period, and under-recovery of previously approved renewable energy costs will represent a charge in addition to approved renewable energy costs recoverable over a future period.

288	X
Advice Notice No.	
DIRECTOR, REGULATORY PRICING & ANALYSIS	

Southwestern Public Service Company
New Mexico
2021 RPS Charge

**Line
No.**

1	Recoverable Renewable Energy Costs (RMS-4, page 1, line 12)	\$ 17,252,659
	Divided by:	
2	Gross Total kWh (Jan - Dec)	7,784,943,429
3	Less Solar*Connect kWh (Jan - Dec)	<u>(4,042,000)</u> ¹
4	Net Total kWh (Jan - Dec)	<u>7,780,901,429</u>
5	2021 RPS Charge per kWh (line no. 1 ÷ line no. 4)	<u>\$ 0.002217</u>

¹ from Bench Request Response in Case No.18-00308-UT.

**FIRST REVISED RATE NO. 77
CANCELING ORIGINAL RATE NO. 77**

X

RPS RECONCILIATION RIDER

X

APPLICABLE: This rate rider is applicable to bills for electric service provided under all of SPS's retail rate schedules, excluding customers previously considered Large Qualifying Customers as defined by Section 62-16-4A(2) of the Renewable Energy Act, or those customers that would meet that definition while this rider is in effect.

TERRITORY: Area served by Company in New Mexico.

RATE: \$(0.000801) per kWh in each billing period.

Renewable energy costs recovered or credited through this rider are approved for recovery by the New Mexico Public Regulation Commission. Company will reconcile costs previously approved for recovery through this Rider. Over-recovery of previously approved renewable energy costs will represent a credit to and reduction of approved renewable energy costs recoverable over a future period, and under-recovery of previously approved renewable energy costs will represent a charge in addition to approved renewable energy costs recoverable over a future period.

Advice Notice No. 288

X

**DIRECTOR, REGULATORY PRICING &
ANALYSIS**

Southwestern Public Service Company
New Mexico
2021 RPS Reconciliation Rider

Line No.		
1	2019 Over-recovery Credited in 2021 (RMS-4, page 1, L3)	\$ (3,367,851)
2	Divided by: Gross Total kWh	7,784,943,429
3	Large Customer kWh	<u>(3,580,326,168) ¹</u>
4	Net Total kWh	<u>4,204,617,261</u>
5	Credit per kWh (line no. 1 ÷ line no. 4)	<u>\$ (0.000801)</u>
6	Net RPS Rider for Non-Large Customers	\$ 0.001416 ²

¹ Estimated kWh to customers with kWh of 10 million or more kWh in 2021. Refund of 2019 Over-Recovery applies only to customers with less than 10 million kWh in 2021. Large customer cap applied in 2019. See the Direct Testimony of Richard M. Luth.

² Net 2021 RPS Rider charge for customers with less than 10 million estimated kWh is \$0.001416 = \$0.002217 - \$0.000801.

Southwestern Public Service Company
Bill Comparison Summary
Monthly Bills by Rate Class

Description	Monthly Bill at Monthly Bill at				% Change
	Current RPS	Rider	Proposed RPS	Riders	
<u>Residential Service (Summer)</u>					
0 kWh	\$ 9.90	\$ 9.90	\$ 9.90	\$ 9.90	0.00%
250 kWh	\$ 35.15	\$ 35.47	\$ 35.47	\$ 35.47	0.91%
500 kWh	\$ 60.39	\$ 61.03	\$ 61.03	\$ 61.03	1.06%
750 kWh	\$ 85.64	\$ 86.60	\$ 86.60	\$ 86.60	1.12%
1,000 kWh	\$ 110.88	\$ 112.16	\$ 112.16	\$ 112.16	1.15%
2,000 kWh	\$ 211.87	\$ 214.43	\$ 214.43	\$ 214.43	1.21%
<u>Residential Service (Non-Summer)</u>					
0 kWh	\$ 9.90	\$ 9.90	\$ 9.90	\$ 9.90	0.00%
250 kWh	\$ 31.57	\$ 31.89	\$ 31.89	\$ 31.89	1.01%
500 kWh	\$ 53.24	\$ 53.88	\$ 53.88	\$ 53.88	1.20%
750 kWh	\$ 74.91	\$ 75.87	\$ 75.87	\$ 75.87	1.28%
1,000 kWh	\$ 96.58	\$ 97.86	\$ 97.86	\$ 97.86	1.33%
2,000 kWh	\$ 183.26	\$ 185.82	\$ 185.82	\$ 185.82	1.40%
<u>Residential Service Annualized</u>					
0 kWh	\$ 9.90	\$ 9.90	\$ 9.90	\$ 9.90	0.00%
250 kWh	\$ 32.76	\$ 33.08	\$ 33.08	\$ 33.08	0.98%
500 kWh	\$ 55.62	\$ 56.26	\$ 56.26	\$ 56.26	1.15%
750 kWh	\$ 78.49	\$ 79.45	\$ 79.45	\$ 79.45	1.22%
1,000 kWh	\$ 101.35	\$ 102.63	\$ 102.63	\$ 102.63	1.26%
2,000 kWh	\$ 192.80	\$ 195.36	\$ 195.36	\$ 195.36	1.33%

Southwestern Public Service Company
Bill Comparison Summary
Monthly Bills by Rate Class

Description	Monthly Bill at Monthly Bill at				% Change
	Current RPS Rider	Proposed RPS Riders	\$ Change	%	
<u>Residential Heat Service (Summer)</u>					
0 kWh	\$ 9.90	\$ 9.90	\$ -	0.00%	
250 kWh	\$ 35.15	\$ 35.47	\$ 0.32	0.91%	
500 kWh	\$ 60.39	\$ 61.03	\$ 0.64	1.06%	
750 kWh	\$ 85.64	\$ 86.60	\$ 0.96	1.12%	
1,000 kWh	\$ 110.88	\$ 112.16	\$ 1.28	1.15%	
2,000 kWh	\$ 211.87	\$ 214.43	\$ 2.56	1.21%	
<u>Residential Heat Service (Non-Summer)</u>					
0 kWh	\$ 9.90	\$ 9.90	\$ -	0.00%	
250 kWh	\$ 27.31	\$ 27.63	\$ 0.32	1.17%	
500 kWh	\$ 44.72	\$ 45.36	\$ 0.64	1.43%	
750 kWh	\$ 62.13	\$ 63.09	\$ 0.96	1.55%	
1,000 kWh	\$ 79.54	\$ 80.82	\$ 1.28	1.61%	
2,000 kWh	\$ 149.19	\$ 151.75	\$ 2.56	1.72%	
<u>Residential Heat Service Annualized</u>					
0 kWh	\$ 9.90	\$ 9.90	\$ -	0.00%	
250 kWh	\$ 29.92	\$ 30.24	\$ 0.32	1.07%	
500 kWh	\$ 49.94	\$ 50.58	\$ 0.64	1.28%	
750 kWh	\$ 69.97	\$ 70.93	\$ 0.96	1.37%	
1,000 kWh	\$ 89.99	\$ 91.27	\$ 1.28	1.42%	
2,000 kWh	\$ 170.08	\$ 172.64	\$ 2.56	1.51%	

Southwestern Public Service Company
Bill Comparison Summary
Monthly Bills by Rate Class

Description	Monthly Bill at Monthly Bill at				% Change
	Current RPS Rider	Proposed RPS Riders	\$ Change	%	
<u>Small General Service (Summer)</u>					
0 kWh	\$ 15.78	\$ 15.78	\$ -	0.00%	
250 kWh	\$ 36.28	\$ 36.60	\$ 0.32	0.88%	
500 kWh	\$ 56.77	\$ 57.41	\$ 0.64	1.13%	
750 kWh	\$ 77.27	\$ 78.23	\$ 0.96	1.24%	
1,000 kWh	\$ 97.77	\$ 99.05	\$ 1.28	1.31%	
2,000 kWh	\$ 179.76	\$ 182.32	\$ 2.56	1.42%	
<u>Small General Service (Non-Summer)</u>					
0 kWh	\$ 15.78	\$ 15.78	\$ -	0.00%	
250 kWh	\$ 33.49	\$ 33.81	\$ 0.32	0.96%	
500 kWh	\$ 51.20	\$ 51.84	\$ 0.64	1.25%	
750 kWh	\$ 68.92	\$ 69.88	\$ 0.96	1.39%	
1,000 kWh	\$ 86.63	\$ 87.91	\$ 1.28	1.48%	
2,000 kWh	\$ 157.48	\$ 160.04	\$ 2.56	1.63%	
<u>Small General Service Annualized</u>					
0 kWh	\$ 15.78	\$ 15.78	\$ -	0.00%	
250 kWh	\$ 34.42	\$ 34.74	\$ 0.32	0.93%	
500 kWh	\$ 53.06	\$ 53.70	\$ 0.64	1.21%	
750 kWh	\$ 71.70	\$ 72.66	\$ 0.96	1.34%	
1,000 kWh	\$ 90.34	\$ 91.62	\$ 1.28	1.42%	
2,000 kWh	\$ 164.91	\$ 167.47	\$ 2.56	1.55%	

Southwestern Public Service Company
Bill Comparison Summary
Monthly Bills by Rate Class

Description	Monthly Bill at Monthly Bill at				% Change
	Current RPS Rider	Proposed RPS Riders	\$ Change	%	
Secondary General Service (Summer)					
1,500 kWh and 12 kW	\$ 308.47	\$ 310.39	\$ 1.92	0.62%	
7,500 kWh and 35 kW	\$ 917.05	\$ 926.64	\$ 9.59	1.05%	
15,000 kWh and 35 kW	\$ 1,103.82	\$ 1,123.01	\$ 19.19	1.74%	
30,000 kWh and 100 kW	\$ 2,774.98	\$ 2,813.37	\$ 38.39	1.38%	
Secondary General Service (Non-Summer)					
1,500 kWh and 12 kW	\$ 268.50	\$ 270.42	\$ 1.92	0.72%	
7,500 kWh and 35 kW	\$ 800.47	\$ 810.07	\$ 9.60	1.20%	
15,000 kWh and 35 kW	\$ 987.24	\$ 1,006.44	\$ 19.20	1.94%	
30,000 kWh and 100 kW	\$ 2,441.91	\$ 2,480.30	\$ 38.39	1.57%	
Secondary General Service Annualized					
1,500 kWh and 12 kW	\$ 281.82	\$ 283.74	\$ 1.92	0.68%	
7,500 kWh and 35 kW	\$ 839.33	\$ 848.93	\$ 9.60	1.14%	
15,000 kWh and 35 kW	\$ 1,026.10	\$ 1,045.30	\$ 19.20	1.87%	
30,000 kWh and 100 kW	\$ 2,552.93	\$ 2,591.32	\$ 38.39	1.50%	

Southwestern Public Service Company
Bill Comparison Summary
Monthly Bills by Rate Class

Description	Monthly Bill at Monthly Bill at				% Change
	Current RPS Rider	Proposed RPS Riders	\$ Change	%	
<u>Irrigation Service (Summer)</u>					
1,500 kWh and 12 kW	\$ 155.57	\$ 157.49	\$ 1.92	1.23%	
7,500 kWh and 35 kW	\$ 632.26	\$ 641.86	\$ 9.60	1.52%	
15,000 kWh and 35 kW	\$ 1,166.45	\$ 1,185.65	\$ 19.20	1.65%	
30,000 kWh and 100 kW	\$ 2,374.26	\$ 2,412.65	\$ 38.39	1.62%	
<u>Irrigation Service (Non-Summer)</u>					
1,500 kWh and 12 kW	\$ 151.24	\$ 152.12	\$ 0.88	0.58%	
7,500 kWh and 35 kW	\$ 619.63	\$ 629.23	\$ 9.60	1.55%	
15,000 kWh and 35 kW	\$ 1,153.82	\$ 1,162.56	\$ 8.74	0.76%	
30,000 kWh and 100 kW	\$ 2,338.17	\$ 2,355.65	\$ 17.48	0.75%	
<u>Irrigation Service Annualized</u>					
1,500 kWh and 12 kW	\$ 152.68	\$ 153.91	\$ 1.23	0.81%	
7,500 kWh and 35 kW	\$ 623.84	\$ 633.44	\$ 9.60	1.54%	
15,000 kWh and 35 kW	\$ 1,158.03	\$ 1,170.26	\$ 12.23	1.06%	
30,000 kWh and 100 kW	\$ 2,350.20	\$ 2,374.65	\$ 24.45	1.04%	

Southwestern Public Service Company
Bill Comparison Summary
Monthly Bills by Rate Class

Description	Monthly Bill at Monthly Bill at				% Change
	Current RPS	Proposed RPS	Riders	\$ Change	
Primary General Service (Summer)					
1,500 kWh and 12 kW	\$ 297.36	\$ 299.28	\$	\$ 1.92	0.65%
7,500 kWh and 35 kW	\$ 859.25	\$ 868.85	\$	\$ 9.60	1.12%
15,000 kWh and 35 kW	\$ 1,010.19	\$ 1,029.39	\$	\$ 19.20	1.90%
30,000 kWh and 100 kW	\$ 2,558.76	\$ 2,597.15	\$	\$ 38.39	1.50%
Primary General Service (Non-Summer)					
1,500 kWh and 12 kW	\$ 259.00	\$ 260.92	\$	\$ 1.92	0.74%
7,500 kWh and 35 kW	\$ 747.37	\$ 756.97	\$	\$ 9.60	1.28%
15,000 kWh and 35 kW	\$ 898.31	\$ 917.50	\$	\$ 19.19	2.14%
30,000 kWh and 100 kW	\$ 2,239.09	\$ 2,277.48	\$	\$ 38.39	1.71%
Primary General Service Annualized					
1,500 kWh and 12 kW	\$ 271.79	\$ 273.71	\$	\$ 1.92	0.71%
7,500 kWh and 35 kW	\$ 784.66	\$ 794.26	\$	\$ 9.60	1.22%
15,000 kWh and 35 kW	\$ 935.60	\$ 954.80	\$	\$ 19.20	2.05%
30,000 kWh and 100 kW	\$ 2,345.65	\$ 2,384.04	\$	\$ 38.39	1.64%

Southwestern Public Service Company
Bill Comparison Summary
Monthly Bills by Rate Class

Description	Monthly Bill at Monthly Bill at				% Change
	Current RPS	Proposed RPS	Riders	\$ Change	
Large General Service - Transmission 69 kV (Summer)					
500,000 kWh and 800 kW	\$ 21,091.34	\$ 21,731.19	\$	639.85	3.03%
1,000,000 kWh and 1,500 kW	\$ 40,342.38	\$ 41,837.45	\$	1,495.07	3.71%
4,000,000 kWh and 6,100 kW	\$ 159,229.74	\$ 165,252.00	\$	6,022.26	3.78%
8,000,000 kWh and 12,200 kW	\$ 317,299.56	\$ 329,014.75	\$	11,715.19	3.69%
Large General Service - Transmission 69 kV (Non-Summer)					
500,000 kWh and 800 kW	\$ 19,334.23	\$ 19,974.07	\$	639.84	3.31%
1,000,000 kWh and 1,500 kW	\$ 36,981.90	\$ 38,542.87	\$	1,560.97	4.22%
4,000,000 kWh and 6,100 kW	\$ 145,563.79	\$ 151,854.01	\$	6,290.22	4.32%
8,000,000 kWh and 12,200 kW	\$ 285,781.94	\$ 297,997.83	\$	12,215.89	4.27%
Large General Service - Transmission 69 kV Annualized					
500,000 kWh and 800 kW	\$ 19,919.93	\$ 20,559.78	\$	639.85	3.21%
1,000,000 kWh and 1,500 kW	\$ 38,102.06	\$ 39,641.06	\$	1,539.00	4.04%
4,000,000 kWh and 6,100 kW	\$ 150,119.11	\$ 156,320.01	\$	6,200.90	4.13%
8,000,000 kWh and 12,200 kW	\$ 296,287.81	\$ 308,336.80	\$	12,048.99	4.07%

Southwestern Public Service Company
Bill Comparison Summary
Monthly Bills by Rate Class

Description	Monthly Bill at Monthly Bill at			% Change
	Current RPS	Proposed RPS	Riders	
	Rider			
Large General Service - Trans 115+ kV (Summer)				
500,000 kWh and 800 kW	\$ 20,983.59	\$ 21,623.43	\$ 639.84	3.05%
1,000,000 kWh and 1,500 kW	\$ 41,462.54	\$ 42,935.65	\$ 1,473.11	3.55%
4,000,000 kWh and 6,300 kW	\$ 161,043.03	\$ 167,029.74	\$ 5,986.71	3.72%
8,000,000 kWh and 13,000 kW	\$ 326,122.53	\$ 337,278.78	\$ 11,156.25	3.42%
Large General Service - Trans 115+ kV (Non-Summer)				
500,000 kWh and 800 kW	\$ 19,267.72	\$ 19,907.56	\$ 639.84	3.32%
1,000,000 kWh and 1,500 kW	\$ 37,962.17	\$ 39,503.92	\$ 1,541.75	4.06%
4,000,000 kWh and 6,300 kW	\$ 147,260.33	\$ 153,517.29	\$ 6,256.96	4.25%
8,000,000 kWh and 13,000 kW	\$ 293,294.26	\$ 305,555.81	\$ 12,261.55	4.18%
Large General Service - Trans 115+ kV Annualized				
500,000 kWh and 800 kW	\$ 19,839.68	\$ 20,479.52	\$ 639.84	3.23%
1,000,000 kWh and 1,500 kW	\$ 39,128.96	\$ 40,647.83	\$ 1,518.87	3.88%
4,000,000 kWh and 6,300 kW	\$ 151,854.56	\$ 158,021.44	\$ 6,166.88	4.06%
8,000,000 kWh and 13,000 kW	\$ 304,237.02	\$ 316,130.13	\$ 11,893.11	3.91%

Southwestern Public Service Company
Bill Comparison Summary
Monthly Bills by Rate Class

Description	Monthly Bill at Monthly Bill at			Riders	\$ Change	% Change
	Current RPS	Proposed RPS	Riders			
Large Municipal and School Service (Summer)						
10,000 kWh and 30 kW	\$ 717.78	\$ 730.57	\$	12.79	1.78%	
20,000 kWh and 45 kW	\$ 1,181.94	\$ 1,207.53	\$	25.59	2.17%	
30,000 kWh and 75 kW	\$ 1,861.56	\$ 1,899.95	\$	38.39	2.06%	
Large Municipal and School Service (Non-Summer)						
10,000 kWh and 30 kW	\$ 646.01	\$ 658.80	\$	12.79	1.98%	
20,000 kWh and 45 kW	\$ 1,074.28	\$ 1,099.88	\$	25.60	2.38%	
30,000 kWh and 75 kW	\$ 1,682.14	\$ 1,720.53	\$	38.39	2.28%	
Large Municipal and School Service Annualized						
10,000 kWh and 30 kW	\$ 669.93	\$ 682.72	\$	12.79	1.91%	
20,000 kWh and 45 kW	\$ 1,110.17	\$ 1,135.76	\$	25.59	2.31%	
30,000 kWh and 75 kW	\$ 1,741.95	\$ 1,780.34	\$	38.39	2.20%	

Southwestern Public Service Company
 Bill Comparison Summary
 Monthly Bills by Rate Class

Description	Monthly Bill at Monthly Bill at			% Change
	Current RPS Rider	Proposed RPS Riders	\$ Change	
Small Municipal and School Service (Summer)				
500 kWh	\$ 51.03	\$ 51.67	\$ 0.64	1.25%
1,000 kWh	\$ 86.48	\$ 87.76	\$ 1.28	1.48%
2,000 kWh	\$ 157.39	\$ 159.95	\$ 2.56	1.63%
Small Municipal and School Service (Non-Summer)				
500 kWh	\$ 46.38	\$ 47.02	\$ 0.64	1.38%
1,000 kWh	\$ 77.19	\$ 78.47	\$ 1.28	1.66%
2,000 kWh	\$ 138.81	\$ 141.37	\$ 2.56	1.84%
Small Municipal and School Service Annualized				
500 kWh	\$ 47.93	\$ 48.57	\$ 0.64	1.34%
1,000 kWh	\$ 80.29	\$ 81.57	\$ 1.28	1.59%
2,000 kWh	\$ 145.00	\$ 147.56	\$ 2.56	1.77%