

Southwestern Public Service Company

Request for Waiver of Rate Filing Package Requirements

A. Fuel Reconciliation-Related Schedules

As discussed in the Direct Testimony of William A. Grant, Southwestern Public Service Company (“SPS”) has not filed a fuel reconciliation with its current base rate case in accordance with the Order in Project No. 41905 and 16 Tex. Admin. Code § 25.236 (“TAC”) as revised in that project. Accordingly, SPS is not seeking a change in its fuel factor under 16 TAC § 25.237. SPS therefore requests waiver of providing projected or Rate Year information or Reconciliation Period information (as indicated below) for all or a portion of the following schedules:

Line No.	<u>Schedule</u>	<u>Description</u>	<u>Specific Waiver</u>
1	H-12.1	Supply and Load Data	Information for Rate Year and Reconciliation Period
2	H-12.2a	Summary of Production by Unit Data	Information for Rate Year and Reconciliation Period
3	H-12.2b	Summary of Production by Unit Data	Information for Rate Year and Reconciliation Period
4	H-12.2c	Summary of Production by Unit Data	Information for Rate Year and Reconciliation Period
5	H-12.3a	Summary of Generating Unit Data	Information for Rate Year and Reconciliation Period
6	H-12.4a & c	Summary of Purchased Power Data	Information for Rate Year and Reconciliation Period
7	H-12.5a – 12.5f	Summary of System Sales Data	Information for Rate Year and Reconciliation Period
8	I-7	Natural Gas Storage Description	Information for Rate Year
9	I-11	Fuel and Purchased Power Assumptions Narrative	Information for Rate Year
10	I-12	Fossil Fuel Mix	Information for Rate Year
11	Q-2	Power Cost Recovery	Information for Rate Year

Some information contained in the following schedules relates to costs not at issue in this base rate case proceeding, therefore SPS requests waiver of providing certain information on reconcilable fuel costs in the following schedules:

Line No.	<u>Schedule</u>	<u>Description</u>	<u>Specific Waiver</u>
12	I-4	Fuel and Fuel Related Contracts	Contract summaries for fuel and fuel-related contracts that do not contain costs recovered through base rates.
13	I-15	Fuel Contract Analyses – Reconciliation Period	Fuel and fuel-related contracts that do not contain costs recovered through base rates.

Additionally, information contained in the following schedules relates to costs not at issue in this base rate case proceeding. Therefore, SPS requests a waiver of all of the following schedules:

Line No.	<u>Schedule</u>	<u>Description</u>	<u>Specific Waiver</u>
14	H-12.4b	Firm Purchased Power Energy Costs	Costs recovered through fuel factor
15	H-12.4d	Firm Purchased Power Energy Cost per MWh	Costs recovered through fuel factor
16	H-12.4e	Non-Firm Purchased Power	Costs recovered through fuel factor
17	H-12.4f	Non-Firm Purchased Power Energy Costs	Costs recovered through fuel factor
18	H-12.4g	Non-Firm Purchased Power Energy Costs Per MWh	Costs recovered through fuel factor
19	I-16	Reconcilable Fuel Costs	Costs recovered through fuel factor
20	I-16.1	Fossil Fuel Mix (Burned)	Costs recovered through fuel factor

Line No.	<u>Schedule</u>	<u>Description</u>	<u>Specific Waiver</u>
21	I-16.2	Fossil Fuel Mix (Purchased)	Costs recovered through fuel factor
22	I-16.3	Competitive Spot Fossil Fuel Purchases	Costs recovered through fuel factor
23	I-16.4	Other Spot Fossil Fuel Purchases	Costs recovered through fuel factor
24	I-22	Fuel Costs Over/Under Recovery	Costs recovered through fuel factor
25	O-5	Variability of Average Fuel Costs with kWh Sales	Costs recovered through fuel factor

B. Updated Test Year Data in Lieu of Test Year Data

As discussed in the Direct Testimony of William A. Grant and Richard M. Luth, SPS is using billing determinants for the Updated Test Year, rather than from the Test Year, to allocate costs among the Texas retail classes and to design rates. Therefore, SPS requests a waiver to provide Updated Test Year data (January 1, 2020 through December 31, 2020) rather than Test Year data in the following schedules:

Line No.	<u>Schedule</u>	<u>Description</u>	<u>Specific Waiver</u>
26	O-1.1	Test Year Data by Rate Class	Does not provide information for the full Test Year; provides nine months of Test Year information and the three months of the Update Period
27	O-1.7	Adjustments to Billing Demand	
28	O-3.3	Other Customer Adjustment Information	
29	O-4.1	kWh Sales and kW Demand	
30	O-6.1	Unadjusted kWh Sales by Month of the Test Year	
31	O-6.2	Adjusted kWh Sales Data	
32	P-10	Payroll Expense Distribution	
33	P-11	Distribution Plant Study	

Line No.	<u>Schedule</u>	<u>Description</u>	<u>Specific Waiver</u>
34	Q-1	Revenue Summary	
35	Q-7	Proof of Revenue Statement	

C. Confidentiality Disclosure Agreement (Schedule W)

As discussed in the Direct Testimony of William A. Grant, SPS requests a waiver so it can use the current version of a Commission-approved protective order rather than the confidentiality disclosure agreement specified in the Schedule W, which is from 1992. Specifically, and as explained in Schedule W, SPS proposes to use the protective order from its most recent rate case, Docket No. 49831, updated with the style and blanks in place of the docket number, and refined citations to the Public Utility Regulatory Act and the Texas Government Code.

Line No.	<u>Schedule</u>	<u>Description</u>	<u>Specific Waiver</u>
36	W	Confidentiality Disclosure Agreement	Requirement to use the 1992 Confidentiality Disclosure Agreement