

DOCKET NO. 51802

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

**UPDATE TESTIMONY
of
JAMES W. SAMPLE**

on behalf of

SOUTHWESTERN PUBLIC SERVICE COMPANY

(Filename: SampleRRUpdate.docx; Total Pages: 26)

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¹ For ease of cross-referencing this update testimony with the original direct testimony filed on February 8, 2021, the sections and subsections in this update testimony correspond with the original sections and subsections in the original direct testimony.

TESTIMONY ATTACHMENTS:

Attachment JWS-RR-U3 (<i>filename: JWS-RR-U3.xlsx</i>).....	17
Attachment JWS-RR-U4 (<i>filename: JWS-RR-U4.xlsx</i>).....	19
Attachment JWS-RR-UA (<i>filename: JWS-RR-UABCD.xlsx</i>).....	23
Attachment JWS-RR-UB(CD) (<i>filename: JWS-RR-UABCD.xlsx</i>).....	24
Attachment JWS-RR-UC (<i>filename: JWS-RR-UABCD.xlsx</i>).....	25
Attachment JWS-RR-UD (<i>filename: JWS-RR-UABCD.xlsx</i>).....	26

GLOSSARY OF ACRONYMS AND DEFINED TERMS

<u>Acronym/Defined Term</u>	<u>Meaning</u>
SPS	Southwestern Public Service Company, a New Mexico corporation
Total Company or total company	Total SPS (before any jurisdictional allocation)
Update Period	October 1, 2020 through December 31, 2020
Updated Test Year	January 1, 2020 through December 31, 2020
XES	Xcel Energy Services Inc.

LIST OF ATTACHMENTS

<u>Attachment</u>	<u>Description</u>
JWS-RR-U3	Security Capital Additions for October 1, 2020 through December 31, 2020 (Filename: JWS-RR-U3.xlsx)
JWS-RR-U4	Security Capital Additions for July 1, 2019 through December 31, 2020 (Filename: JWS-RR-U4.xlsx)
JWS-RR-UA (Updated Test Year)	Summary of XES Expenses to SPS by Affiliate Class and Billing Method (Filename: JWS-RR-UABCD.xlsx)
JWS-RR-UB(CD) (Updated Test Year)	XES Expenses by Affiliate Class, Activity, Billing Method, and FERC Account (Filename: JWS-RR-UABCD.xlsx)
JWS-RR-UC (Updated Test Year)	Exclusions from XES Expenses to SPS by Affiliate Class and FERC Account (Filename: JWS-RR-UABCD.xlsx)
JWS-RR-UD (Updated Test Year)	Pro Forma Adjustments to XES Expenses by Affiliate Class and FERC Account (Filename: JWS-RR-UABCD.xlsx)

**UPDATE TESTIMONY
OF
JAMES W. SAMPLE**

I. WITNESS IDENTIFICATION

1

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

3 A. My name is James W. Sample. My business address is 1800 Larimer Street,
4 Denver, Colorado 80202.

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

6 A. I am employed by Xcel Energy Services Inc. (“XES”) as Vice President, Enterprise
7 Security Services & Chief Security Officer.

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

9 A. I am filing testimony on behalf of Southwestern Public Service Company, a New
10 Mexico corporation (“SPS”).

11 **Q. Are you the same James W. Sample who filed direct testimony on behalf of**
12 **SPS in this docket?**

13 A. Yes.

1 **II. ASSIGNMENT AND SUMMARY OF TESTIMONY AND**
2 **RECOMMENDATIONS**

3 **Q. What is your assignment in this update testimony?**

4 A. As explained in SPS's direct testimony, SPS is using an Updated Test Year in this
5 case. The Updated Test Year is the period from January 1, 2020 through December
6 31, 2020. Because of the timing of the filing of this case, certain costs for the period
7 from October 1, 2020 through December 31, 2020 ("Update Period") in my direct
8 testimony were estimated. My assignment in this update testimony is to replace
9 those estimated costs with actual costs. The result of this update is that the Updated
10 Test Year now consists of only actual information, and no estimates. For ease of
11 cross-referencing this update testimony with my direct testimony filed on February
12 8, 2021, the sections and subsections in this update testimony correspond with the
13 original sections and subsections in my direct testimony.

14 With respect to the Security capital costs (and related affiliate expense) that
15 I support, I provide actual costs for projects placed in service during the Update
16 Period in my Attachment JWS-RR-U3.

17 Regarding the Enterprise Security affiliate costs I support, my direct
18 testimony provided actual figures for October and November 2020 and estimated
19 figures for December 2020 based on the forecasted budget. In this testimony, I
20 replace the December 2020 estimates with actuals. In addition, the October through
21 December 2020 expenses have now gone through the full pro forma adjustment
22 review process. Thus, I provide updated figures for those Update Period expenses.
23 My update testimony includes Attachments JWS-RR-UA through JWS-RR-UD in
24 support of the Enterprise Security affiliate costs I support.

1 **Q. Please summarize your update testimony and recommendations.**

2 A. **Capital Costs** – The amounts included in Attachment JWS-RR-U3 represent the
3 actual total company costs for the Security-related capital projects, including
4 affiliate costs. For the reasons provided in my direct testimony and Attachment
5 JWS-RR-U3, the costs included in Attachment JWS-RR-U3 are reasonable,
6 necessary, and prudently incurred.

7 **Affiliate Costs** – The estimated Updated Test Year costs for the services of the
8 Enterprise Security affiliate class that SPS sought to recover were \$3,394,611 (total
9 SPS before jurisdictional allocations, or “total company”). The actual Updated Test
10 Year costs for the services of the Enterprise Security affiliate class that SPS seeks
11 to recover are \$3,536,263. Please refer to Attachments JWS-RR-UA through
12 JWS-RR-UD. In addition to providing updated SPS numbers, those attachments
13 also reflect the total updated XES class expenses for the Enterprise Security affiliate
14 class. The actual costs are reasonable and necessary for the reasons provided in my
15 direct testimony and this testimony.

16 **Q. Were Attachments JWS-RR-U3, JWS-RR-U4 and JWS-RR-UA through**
17 **JWS-RR-UD prepared by you or under your direct supervision and control?**

18 A. Yes, as to the project descriptions in Attachments JWS-RR-U3 and JWS-RR-U4.
19 Those attachments and the cost information contained in them were prepared by
20 SPS witness Mark P. Moeller and his staff. My staff and I have reviewed these
21 attachments, and I believe them to be accurate. Attachments JWS-RR-UA through
22 JWS-RR-UD were prepared as described by SPS witness Ross L. Baumgarten. My
23 staff and I have reviewed these attachments and I believe them to be accurate.

1 Although the information I have described is also present in the attachments of
2 these witnesses, I have presented this information in the attachments to my update
3 testimony for the convenience of those reviewing it.

1 **III. SECURITY SERVICES CAPITAL ADDITIONS**

2 **C. Security-Related Capital Projects Placed in Service between**
3 **October 1, 2020 and December 31, 2020**
4

5 **Q. Has SPS updated the Security-related capital costs for projects placed in**
6 **service between October 1, 2020 and December 31, 2020?**

7 A. Yes. SPS seeks to include in rate base the cost of capital additions placed in service
8 during the Update Period, and included estimated costs for those capital additions
9 expected to be placed in service during the Update Period in direct testimony.
10 Attachment JWS-RR-U3 provides SPS's actual total company costs for the
11 Security-related capital projects, including affiliate costs. For the reasons provided
12 in my direct testimony and Attachment JWS-RR-U3, the costs included in
13 Attachment JWS-RR-U3 are reasonable, necessary, and prudently incurred.

14 **Q. Are you also providing an updated attachment showing all of the Security-**
15 **related capital additions closed to plant in service during the 18-month period**
16 **from July 1, 2019 through December 31, 2020?**

17 A. Yes. To ensure that all of the Security-related capital additions can be found in one
18 document, I am also providing Attachment JWS-RR-U4, which contains all of the
19 Security capital additions closed to plant in service during the period from July 1,
20 2019 through December 31, 2020. For the reasons provided in my direct testimony
21 and attachments, as well as the reasons set forth in my update testimony and
22 attachments, all of the costs included in Attachment JWS-RR-U4 are reasonable
23 and necessary, and they were prudently incurred. Accordingly, they should be
24 included in SPS's rate base.

1 IV. **UPDATED AFFILIATE EXPENSES FOR THE**
2 **ENTERPRISE SECURITY CLASS OF SERVICES**

3 A. **Summary of Affiliate Expenses for the Enterprise Security Class of**
4 **Services**

5 Q. What is the dollar amount of the Updated Test Year XES charges that SPS
6 requests, on a total company basis, for the Enterprise Security affiliate class?

7 A. The following table summarizes the dollar amount of the actual Updated Test Year
8 XES charges for the Enterprise Security affiliate class.

9 **Table JWS-RR-U1²**

		Requested Amount of XES Class Expenses Billed to SPS (Total Company)		
Class of Services	Total XES Class Expenses	Requested Amount	% Direct Billed	% Allocated
Enterprise Security	\$26,622,099	\$3,536,263	13%	87%

10 Q. Please describe the updated attachments that support the information
11 provided on Table JWS-RR-U1.

12 A. Attachments JWS-RR-UA through JWS-RR-UD present the updated information
13 about the requested SPS affiliate expenses for the Enterprise Security affiliate class.
14 The detailed descriptions for Attachments JWS-RR-A through JWS-RR-D that
15 were provided in my direct testimony remain applicable to these updated
16 attachments.

² **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 JRL-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.

1 **Q. Are there updated exclusions for the Enterprise Security affiliate class?**

2 A. Yes. The actual exclusions are provided on Attachment JWS-RR-UC.

3 **Q. Are there updated pro forma adjustments to SPS's per book expenses for the**
4 **Enterprise Security affiliate class?**

5 A. Yes. As I mentioned in my direct testimony, pro forma adjustments are revisions
6 to Updated Test Year expenses for known and measurable changes. Pro forma
7 adjustments are shown on Attachment JWS-RR-UA, Column J, and on Attachment
8 JWS-RR-UB, Column M. The details for the pro forma adjustments, including the
9 witness or witnesses who sponsor each pro forma adjustment, are provided in
10 Attachment JWS-RR-UD.

11 **Q. Attachment JWS-RR-UD shows that you sponsor pro forma adjustments for**
12 **expenses for the Enterprise Security affiliate class during the Updated Test**
13 **Year that result in a net decrease for the Enterprise Security affiliate class of**
14 **\$1,786.41. Please explain the adjustments.**

15 A. The adjustments that I sponsor remove charges for life events (a decrease of
16 \$199.85); remove charges for recognition (a decrease of \$1,266.07); and remove
17 charges for costs not benefitting SPS (a decrease of \$320.49).

18 **C. The Enterprise Security Class of Services are Provided at a**
19 **Reasonable Cost**

20 **Q. What is the purpose of this section of your update testimony?**

21 A. In this section of my direct testimony, several numbers were based on estimates for
22 the Update Period. In this update testimony, I replace those estimates with actual
23 numbers, and explain that the actual costs for the Enterprise Security affiliate class
24 are reasonable.

1 *I. Additional Evidence*

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

4 A. Yes. Of the Updated Test Year costs for the Enterprise Security class, 53.58% are
5 compensation and benefits costs for XES personnel. SPS witnesses Michael P.
6 Deselich and Richard R. Schrubbe establish that the level of Xcel Energy's
7 compensation and benefits is reasonable and necessary. In addition, over 36.71%
8 of the costs for this class were for goods or services procured by contract. Xcel
9 Energy's Supply Chain organization is responsible for the sourcing and purchasing
10 of good and services needed by SPS, as well as the review and processing of
11 payments by vendors. SPS witness Robert H. Kunze provides testimony about
12 these functions and demonstrates that the Supply Chain processes and controls
13 produce reasonable costs supporting SPS's operations.

14 *3. Cost Trends*

15 **Q. Please quantify the actual per book charges from XES to SPS for the**
16 **Enterprise Security class of services for the three years preceding the Updated**
17 **Test Year and for the Updated Test Year.**

18 A. Table JWS-RR-U2 shows the actual per book affiliate charges for the years from
19 2017-2019 and for the Updated Test Year. Those charges also appear on Column
20 I on Attachment JWS-RR-UA.

1

Table JWS-RR-U2

	(Per Book) Charges Over Time				
Class of Services	2017	2018	2019	Updated Test Year (Estimated)	Updated Test Year (Actual)
Enterprise Security	\$2,262,047	\$2,659,584	\$2,788,100	\$3,418,179	\$3,562,777

2

4. Staffing Trends

3

Q. Please provide the staffing levels for the Enterprise Security class of services for the three years preceding the Updated Test Year and for the Updated Test Year.

4

5

6

A. Table JWS-RR-U3 shows the average end-of-month staffing levels for the Enterprise Security class of services.

7

8

Table JWS-RR-U3

	Average of End of Month # of Staff				
Class of Services	2017	2018	2019	Updated Test Year (Estimated)	Updated Test Year (Actual)
Enterprise Security	87	123	140	148	149

9

D. The Costs for the Enterprise Security Class of Services are Priced in a Fair Manner

10

11

Q. Have any of the predominant allocation methods for the Enterprise Security affiliate operation and maintenance expenses changed?

12

13

A. No. The predominant allocation methods have remained the same, but the percentages and amounts have slightly changed as follows:

14

1

Table JWS-RR-U4

Allocation Method	Estimated Percentage of XES Charges to SPS/Amount Requested (total company) in Direct Testimony	Actual Percentage of XES Charges to SPS/Amount Requested (total company) in Update Filing
Assets, Revenues, Number of Employees	62.21% / \$2,111,899	62.39% / \$2,206,292
Number of Employees	24.57% / \$834,083	24.44% / \$864,105
Direct Billing	12.28% / \$416,830	12.96% / \$458,276

2 **Q.** Does this conclude your pre-filed update testimony?

3 **A.** Yes.

AFFIDAVIT

STATE OF COLORADO)
)
COUNTY OF DENVER)

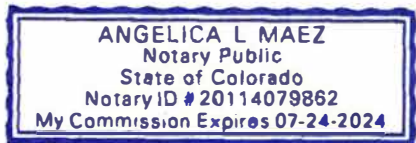
JAMES W. SAMPLE, first being sworn on his oath, states:

I am the witness identified in the preceding Update Testimony. I have read the Update 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 Update Testimony are true, valid, and accurate.

James W. Sample

JAMES W. SAMPLE

Subscribed and sworn to before me this 19th day of March 2021 by JAMES W. SAMPLE.



Angelica Maez
Notary Public, State of Colorado

My Commission Expires: 7.24.2024

CERTIFICATE OF SERVICE

I certify that on the 25th day of March 2021, notice of the filing of the foregoing update testimony with the PUCT was served on all parties of record by electronic service and was posted to SPS's file sharing platform.

/s/ Jeremiah W. Cunningham

Southwestern Public Service Company

Security Capital Additions

October 1, 2020 through December 31, 2020

(A)			(B)	(C)	(D)	(E-i)
Line No.	Asset Class	Witness	Project Category	Additions to Plant-in-Service (Oct. 2020 - Dec. 2020)	XES Charges (Included in Column D)	
1	Electric General - Software	Sample	Cyber Security	\$ 712,573.86	\$ 10,501.36	
2	Electric General - Software	Sample	Cyber Security	502,026.54	5,664.12	
3	Electric General - Software	Sample	Cyber Security	198,103.14	22,452.36	
4	Electric General - Software	Sample	Cyber Security	148,110.64	15,638.78	
5	Electric General - Software	Sample	Cyber Security	122,492.89	20,554.03	
6	Electric General - Software	Sample	Cyber Security	91,154.21	86,343.91	
7	Electric General - Software	Sample	Cyber Security	87,356.91	26,010.12	
8	Electric General - Software	Sample	Cyber Security	16,270.77	10,927.92	
9	Electric General - Software	Sample	Cyber Security	4,567.57	4,596.08	
10	Electric General - Software	Sample	Cyber Security	(218.51)	(84.96)	
11	Total Electric General -			\$ 1,882,438.02	\$ 202,603.72	
12	Electric General	Sample	Cyber Security	\$ 44,686.04	\$ -	
13	Electric General	Sample	Cyber Security	614.97	-	
14	Electric General	Sample	Cyber Security	14.28	-	
15	Total Electric General			\$ 45,315.29	\$ -	
16	Grand Total			\$ 1,927,753.31	\$ 202,603.72	

Southwestern Public Service Company

Security Capital Additions

October 1, 2020 through December 31, 2020

(A)		(E-ii)		(E-iii)		(F)
Line No.	Asset Class	Other Affiliate Charges (Included in Column D)	Total Affiliate Charges (Included in Column D)	Parent Description		
1	Electric General - Software	\$	-	\$	10,501.36	ITC Email Adv Threat Prot SW SPS-20
2	Electric General - Software	-	-	\$	5,664.12	Host Intrusion SW SPS-10684
3	Electric General - Software	-	-	-	22,452.36	ITC OT Monitoring 2020 SW SPS-20018
4	Electric General - Software	-	-	-	15,638.78	Ent DataBase Security Ph4 SW SPS-10774
5	Electric General - Software	-	-	-	20,554.03	CyberArk CIP SW SPS-10749
6	Electric General - Software	-	-	-	86,343.91	ITC-CloudSAST_DAST-SW SPS-200165
7	Electric General - Software	-	-	-	26,010.12	ITC-MFA-Maturation-SW SPS
8	Electric General - Software	-	-	-	10,927.92	ITC-Cloud Access Serty Brk SW SPS-2
9	Electric General - Software	-	-	-	4,596.08	ITC-Security Camera Verint-SW SPS
10	Electric General - Software	-	-	-	(84.96)	ITC-Virtual Emergency SW TX-10745
11	Total Electric General -	\$	-	\$	202,603.72	
12	Electric General	\$	-	\$	-	ITC OT Monitoring 2020 HW SPS
13	Electric General	-	-	-	-	Purch Sec Camera HW NM
14	Electric General	-	-	-	-	Purch Sec Camera HW TX
15	Total Electric General	\$	-	\$	-	
16	Grand Total	\$	-	\$	202,603.72	

Southwestern Public Service Company
Security Capital Additions
July 1, 2019 through December 31, 2019

(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.0001770.007.001.001	Electronic Data SW SPS	Electric General - Software	Sample	Cyber Security	D.0001770.007	
2						D.0001770.007 Total	
3	D.0001771.007.001.001	Certificate Key Mgmt SW SPS	Electric General - Software	Sample	Cyber Security	D.0001771.007	
4						D.0001771.007 Total	
5	D.0001818.018.001.001	Security Incident SW SPS	Electric General - Software	Sample	Cyber Security	D.0001818.018	
6						D.0001818.018 Total	
7	D.0002098.004.001.001	CyberArk PAM SW SPS-10694	Electric General - Software	Sample	Cyber Security	D.0002098.004	
8						D.0002098.004 Total	
9	D.0002099.007.001.001	Firewall Rule Mgmt SW SPS-10707	Electric General - Software	Sample	Cyber Security	D.0002099.007	
10						D.0002099.007 Total	
11	D.0002101.006.001.001	eGRC Ph3 SW SPS-10719	Electric General - Software	Sample	Cyber Security	D.0002101.006	
12						D.0002101.006 Total	
13	D.0001818.108.001.001	Emergency Mass SW SPS-10709	Electric General - Software	Sample	Cyber Security	D.0001818.108	
14						D.0001818.108 Total	
15	D.0002101.012.001.001	eGRC Continuity SW SPS-10750	Electric General - Software	Sample	Cyber Security	D.0002101.012	
16						D.0002101.012 Total	
17	D.0002202.006.001.001	Multi Auth SW SPS-10759	Electric General - Software	Sample	Cyber Security	D.0002202.006	
18						D.0002202.006 Total	
19	D.0002189.006.001.001	ITC-Virtual Emergency SW TX-10745	Electric General - Software	Sample	Cyber Security	D.0002189.006	
20						D.0002189.006 Total	
21	D.0002001.020.001.001	Sailpoint Ph4 SW SPS-10760	Electric General - Software	Sample	Cyber Security	D.0002001.020	
22						D.0002001.020 Total	
23	D.0002101.018.001.001	eGRC Standard SW SPS-10751	Electric General - Software	Sample	Cyber Security	D.0002101.018	
24						D.0002101.018 Total	
25	D.0002008.012.001.001	Enterprise Data Ph3 SW SPS-10762	Electric General - Software	Sample	Cyber Security	D.0002008.012	
26						D.0002008.012 Total	
27	D.0002165.007.001.001	OT Monitor DRAGOS SW SPS-10772	Electric General - Software	Sample	Cyber Security	D.0002165.007	
28						D.0002165.007 Total	
29	D.0002268.005.001.001	ITC-Endpoint Srvr Security Suite-SW	Electric General - Software	Sample	Cyber Security	D.0002268.005	
30						D.0002268.005 Total	
31	D.0002123.008.001.001	ITC-Security Camera Verint-SW SPS	Electric General - Software	Sample	Cyber Security	D.0002123.008	
32						D.0002123.008 Total	
33	D.0001770.026.001.001	Secure File MFT SW SPS-10754	Electric General - Software	Sample	Cyber Security	D.0001770.026	
34						D.0001770.026 Total	
35	D.0002317.004.001.001	ITC-Cloud Access Serty Brk SW SPS-2	Electric General - Software	Sample	Cyber Security	D.0002317.004	

Southwestern Public Service Company

Security Capital Additions

July 1, 2019 through December 31, 2019

	(A)	(G)	(H)	(I)	(J)	(K)	(L)	(M)
Line No.	WBS Level 4 Number	WBS Level 2 Description	In-Service Date	Additions (Jul 2019 - Dec 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.0001770.007.001.001	Electronic Data SW SPS	201703	\$ 806.94	\$ -	\$ -	\$ -	\$ 806.94
2				806.94	-	-	-	806.94
3	D.0001771.007.001.001	Certificate Key Mgmt SW SPS	201812	33.76	33.76	-	33.76	-
4				33.76	33.76	-	33.76	-
5	D.0001818.018.001.001	Security Incident SW SPS	201709	(513.06)	-	-	-	(513.06)
6				(513.06)	-	-	-	(513.06)
7	D.0002098.004.001.001	CyberArk PAM SW SPS-10694	201812	1,932.32	1,932.32	-	1,932.32	-
8				1,932.32	1,932.32	-	1,932.32	-
9	D.0002099.007.001.001	Firewall Rule Mgmt SW SPS-10707	201812	1,956.07	1,956.07	-	1,956.07	-
10				1,956.07	1,956.07	-	1,956.07	-
11	D.0002101.006.001.001	eGRC Ph3 SW SPS-10719	201812	29.54	29.54	-	29.54	-
12				29.54	29.54	-	29.54	-
13	D.0001818.108.001.001	Emergency Mass SW SPS-10709	201811	175.44	175.44	-	175.44	-
14				175.44	175.44	-	175.44	-
15	D.0002101.012.001.001	eGRC Continuity SW SPS-10750	201912	46,695.62	12,215.89	-	12,215.89	34,479.73
16				46,695.62	12,215.89	-	12,215.89	34,479.73
17	D.0002202.006.001.001	Multi Auth SW SPS-10759	201912	226,805.64	140,038.82	-	140,038.82	86,766.82
18				226,805.64	140,038.82	-	140,038.82	86,766.82
19	D.0002189.006.001.001	ITC-Virtual Emergency SW TX-10745	202008	153,643.27	149,273.20	-	149,273.20	4,370.07
20				153,643.27	149,273.20	-	149,273.20	4,370.07
21	D.0002001.020.001.001	Sailpoint Ph4 SW SPS-10760	201912	227,706.83	105,729.32	-	105,729.32	121,977.51
22				227,706.83	105,729.32	-	105,729.32	121,977.51
23	D.0002101.018.001.001	eGRC Standard SW SPS-10751	201912	52,302.82	23,908.28	-	23,908.28	28,394.54
24				52,302.82	23,908.28	-	23,908.28	28,394.54
25	D.0002008.012.001.001	Enterprise Data Ph3 SW SPS-10762	201911	81,555.56	19,682.09	-	19,682.09	61,873.47
26				81,555.56	19,682.09	-	19,682.09	61,873.47
27	D.0002165.007.001.001	OT Monitor DRAGOS SW SPS-10772	201911	263,884.16	253,676.51	-	253,676.51	10,207.65
28				263,884.16	253,676.51	-	253,676.51	10,207.65
29	D.0002268.005.001.001	ITC-Endpoint Svr Security Suite-SW	202004	50,456.07	49,397.18	-	49,397.18	1,058.89
30				50,456.07	49,397.18	-	49,397.18	1,058.89
31	D.0002123.008.001.001	ITC-Security Camera Verint-SW SPS	202007	49,230.24	48,313.47	-	48,313.47	916.77
32				49,230.24	48,313.47	-	48,313.47	916.77
33	D.0001770.026.001.001	Secure File MFT SW SPS-10754	201911	26,712.15	6,125.23	-	6,125.23	20,586.92
34				26,712.15	6,125.23	-	6,125.23	20,586.92
35	D.0002317.004.001.001	ITC-Cloud Access Serty Brk SW SPS-2	202012	16,270.77	10,927.92	-	10,927.92	5,342.85

Southwestern Public Service Company
Security Capital Additions
July 1, 2019 through December 31, 2019

(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	
36	D.0002008.018.001.001	Ent DataBase Security P4d SW SPS-10	Electric General - Software	Sample	Cyber Security	D.0002317.004 Total	
37	D.0002008.018.001.001					D.0002008.018	
38	D.0002344.004.001.001	ITC OT Monitoring 2020 SW SPS-20018	Electric General - Software	Sample	Cyber Security	D.0002008.018 Total	
39	D.0002344.004.001.001					D.0002344.004	
40	D.0002316.004.001.001	ITC-CloudSAST_DAST-SW SPS-200165	Electric General - Software	Sample	Cyber Security	D.0002344.004 Total	
41	D.0002316.004.001.001					D.0002316.004	
42	D.0001825.092.001.001	Host Intrusion SW SPS-10684	Electric General - Software	Sample	Cyber Security	D.0002316.004 Total	
43	D.0001825.092.001.001					D.0001825.092	
44	D.0002315.004.001.001	ITC-MFA-Maturation-SW SPS	Electric General - Software	Sample	Cyber Security	D.0001825.092 Total	
45	D.0002315.004.001.001					D.0002315.004	
46	D.0002098.017.001.001	CyberArk CIP SW SPS-10749	Electric General - Software	Sample	Cyber Security	D.0002315.004 Total	
47	D.0002098.017.001.001					D.0002098.017	
48	D.0002326.004.001.001	ITC Email Adv Threat Prot SW SPS-20	Electric General - Software	Sample	Cyber Security	D.0002098.017 Total	
49	D.0002326.004.001.001					D.0002326.004	
50						D.0002326.004 Total	
51			Total Electric General - Softw				
52	D.0001804.126.001.010	Purch Security Camera Plant X SPS	Electric General	Sample	Security - Controls & Monitoring	D.0001804.126	
53	D.0001804.126.001.009	Purch Security Camera Jones SPS	Electric General	Sample	Security - Controls & Monitoring	D.0001804.126	
54	D.0001804.126.001.009					D.0001804.126 Total	
55	D.0001840.114.001.002	Purch Sec Camera Canyon TX	Electric General	Sample	Cyber Security	D.0001840.114	
56	D.0001840.114.001.004	Purch Sec Camera Pampa TX	Electric General	Sample	Cyber Security	D.0001840.114	
57	D.0001840.114.001.003	Purch Sec Camera Tolk TX	Electric General	Sample	Cyber Security	D.0001840.114	
58	D.0001840.114.001.006	Purch Sec PowerEdge HW SPS	Electric General	Sample	Cyber Security	D.0001840.114	
59	D.0001840.114.001.005	Purch Sec Camera PlanView TX	Electric General	Sample	Cyber Security	D.0001840.114	
60						D.0001840.114 Total	
61	D.0001781.042.001.001	Security Projects - Electric -	Electric General	Sample	Security - Controls & Monitoring	D.0001781.042	
62	D.0001781.042.001.001					D.0001781.042 Total	
63	D.0001840.116.001.002	Purch Sec Camera HW Roswell NM	Electric General	Sample	Cyber Security	D.0001840.116	
64	D.0001840.116.001.002					D.0001840.116 Total	
65	D.0002165.010.001.001	ITC-Purch OT Monitor DRAGOS HW SPS	Electric General	Sample	Cyber Security	D.0002165.010	
66	D.0002165.010.001.001					D.0002165.010 Total	
67	D.0002344.008.001.001	ITC OT Monitoring 2020 HW SPS	Electric General	Sample	Cyber Security	D.0002344.008	
68	D.0002344.008.001.001					D.0002344.008 Total	
69			Total Electric General				
70			Grand Total				

Southwestern Public Service Company

Security Capital Additions

July 1, 2019 through December 31, 2019

Line No.	(A) WBS Level 4 Number	(G) WBS Level 2 Description	(H) In-Service Date	(I) Additions (Jul 2019 - Dec 2020)	(J) XES Charges (Included in Column I)	(K) Other Affiliate Charges (Included in Column I)	(L) Total Affiliate Charges (Included in Column I)	(M) Total Native Charges (Columns 1 less L) Within the Total Additions to Plant-in-Service Shown in Column (I)
36	D.0002008.018.001.001	Ent DataBase Security Ph4 SW SPS-10	202012	16,270.77	10,927.92	-	10,927.92	5,342.85
37	D.0002008.018.001.001	Ent DataBase Security Ph4 SW SPS-10	202012	148,110.64	15,638.78	-	15,638.78	132,471.86
38	D.0002344.004.001.001	ITC OT Monitoring 2020 SW SPS-20018	202012	148,110.64	15,638.78	-	15,638.78	132,471.86
39	D.0002344.004.001.001	ITC OT Monitoring 2020 SW SPS-20018	202012	198,103.14	22,452.36	-	22,452.36	175,650.78
40	D.0002316.004.001.001	ITC-CloudSAST_DAST-SW SPS-200165	202012	198,103.14	22,452.36	-	22,452.36	175,650.78
41	D.0002316.004.001.001	ITC-CloudSAST_DAST-SW SPS-200165	202012	91,154.21	86,343.91	-	86,343.91	4,810.30
42	D.0001825.092.001.001	Host Intrusion SW SPS-10684	202012	502,026.54	5,664.12	-	5,664.12	496,362.42
43	D.0001825.092.001.001	Host Intrusion SW SPS-10684	202012	502,026.54	5,664.12	-	5,664.12	496,362.42
44	D.0002315.004.001.001	ITC-MFA-Maturation-SW SPS	202012	87,356.91	26,010.12	-	26,010.12	61,346.79
45	D.0002315.004.001.001	ITC-MFA-Maturation-SW SPS	202012	87,356.91	26,010.12	-	26,010.12	61,346.79
46	D.0002098.017.001.001	CyberArk CIP SW SPS-10749	202012	122,492.89	20,554.03	-	20,554.03	101,938.86
47	D.0002098.017.001.001	CyberArk CIP SW SPS-10749	202012	122,492.89	20,554.03	-	20,554.03	101,938.86
48	D.0002326.004.001.001	ITC Email Adv Threat Prot SW SPS-20	202012	712,573.86	10,501.36	-	10,501.36	702,072.50
49	D.0002326.004.001.001	ITC Email Adv Threat Prot SW SPS-20	202012	712,573.86	10,501.36	-	10,501.36	702,072.50
50								
51	D.0001804.126.001.010	Purch Network Appl Camera Upgr SPS	201803	\$ 3,061,502.33	\$ 1,010,579.72	\$ -	\$ 1,010,579.72	\$ 2,050,922.61
52	D.0001804.126.001.010	Purch Network Appl Camera Upgr SPS	201803	\$ 184.23	\$ -	\$ -	\$ -	\$ 184.23
53	D.0001804.126.001.009	Purch Network Appl Camera Upgr SPS	201803	728.42	-	-	-	728.42
54	D.0001840.114.001.002	Purch Sec Camera HW TX	201812	912.65	-	-	-	912.65
55	D.0001840.114.001.004	Purch Sec Camera HW TX	201909	48.91	-	-	-	48.91
56	D.0001840.114.001.004	Purch Sec Camera HW TX	201909	176,854.01	-	-	-	176,854.01
57	D.0001840.114.001.003	Purch Sec Camera HW TX	202004	324,795.38	-	-	-	324,795.38
58	D.0001840.114.001.006	Purch Sec Camera HW TX	201912	34,430.71	-	-	-	34,430.71
59	D.0001840.114.001.005	Purch Sec Camera HW TX	201905	2,561.52	-	-	-	2,561.52
60	D.0001781.042.001.001	Security Projects - Electric -	201906	538,690.53	-	-	-	538,690.53
61	D.0001781.042.001.001	Security Projects - Electric -	201906	57,298.16	578.86	-	578.86	56,719.30
62	D.0001840.116.001.002	Purch Sec Camera HW NM	201909	57,298.16	578.86	-	578.86	56,719.30
63	D.0001840.116.001.002	Purch Sec Camera HW NM	201909	196,032.04	-	-	-	196,032.04
64	D.0002165.010.001.001	ITC-Purch OT Monitor DRAGOS HW SPS	201911	11,449.44	-	-	-	11,449.44
65	D.0002165.010.001.001	ITC-Purch OT Monitor DRAGOS HW SPS	201911	11,449.44	11,444.14	-	11,444.14	5.30
66	D.0002344.008.001.001	ITC OT Monitoring 2020 HW SPS	202012	11,449.44	11,444.14	-	11,444.14	5.30
67	D.0002344.008.001.001	ITC OT Monitoring 2020 HW SPS	202012	44,686.04	-	-	-	44,686.04
68				44,686.04	-	-	-	44,686.04
69				\$ 849,068.86	\$ 12,023.00	\$ -	\$ 12,023.00	\$ 837,045.86
70				\$ 3,910,571.19	\$ 1,022,602.72	\$ -	\$ 1,022,602.72	\$ 2,887,968.47

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.	Affiliate 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 Forms	Requested Amount (Total Company)	% of Class Charges
1	Enterprise Security	200074 - Corporate Systems - Corporate Governance	Assets/Revenue/No. of Employees	\$ 16,812,918.55	\$ 14,641,102.34	\$ 2,171,816.21	\$ (162.54)	\$ 2,171,653.67	\$ 34,638.37	\$ 2,206,292.04	62.39%
2	Enterprise Security	200152 - Customer Care 902	No. of Customers	106,951.74	99,546.98	7,404.76	-	7,404.76	185.39	7,590.15	0.21%
3	Enterprise Security	200165 - Employee Management Systems	No. of Employees	5,866,091.36	5,011,957.64	854,133.72	(2.55)	854,131.17	9,973.65	864,104.82	24.44%
4	Enterprise Security	Direct	Direct	3,836,136.88	3,306,549.82	529,587.06	-	529,587.06	(71,310.86)	458,276.20	12.96%
5	Enterprise Security Total			<u>\$ 26,622,098.53</u>	<u>\$ 23,059,156.78</u>	<u>\$ 3,562,941.75</u>	<u>\$ (165.09)</u>	<u>\$ 3,562,776.66</u>	<u>\$ (26,513.45)</u>	<u>\$ 3,536,263.21</u>	<u>100.00%</u>
6	Total Witness James W. Sample										
	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

James W. Sample

Docket No. 51802

**APPLICATION OF
SOUTHWESTERN PUBLIC SERVICE COMPANY
FOR AUTHORITY TO CHANGE RATES**

JWS-RR-UB(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) Line No.	(B) Affiliate Class	(C) FERC Account	(D) Explanation for Exclusions	(E) Exclusions (Total Company)
1	Enterprise Security	426.4 - Expenditures for certain civic, political and related activities	Below the Line	\$ (0.05)
2	Enterprise Security	426.5 - Other Deductions	Below the Line	(165.04)
3	Enterprise Security Total			<u>\$ (165.09)</u>
4	Total Witness James W. Sample			<u><u>\$ (165.09)</u></u>

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
For the Twelve Months Ended December 31, 2020**

(A) Line No.	(B) Affiliate Class	(C) FERC Account	(D) Explanation for Pro Formas	(E) Sponsor	(F) Pro Formas (Total Company)
1	Enterprise Security	902 - Meter reading expenses	3% Wage Adjustment	Stephanie N. Niemi/Michael P. Deselich	\$ 185.39
2	Enterprise Security	920 - Administrative and general salaries	3% Wage Adjustment	Stephanie N. Niemi/Michael P. Deselich	55,003.72
3	Enterprise Security	921 - Office supplies and expenses	Business Area Adjustment	James W. Sample	(1,786.41)
4	Enterprise Security	930.1 - General advertising expenses	Advertising	Stephanie N. Niemi	(79,916.15)
5	Enterprise Security Total				\$ (26,513.45)
6	Total Witness James W. Sample				\$ (26,513.45)
	Amounts may not add or tie to other schedules due to rounding				