

DOCKET NO. 51802

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

**UPDATE TESTIMONY
of
ROBERT H. KUNZE**

on behalf of

SOUTHWESTERN PUBLIC SERVICE COMPANY

(Filename: KunzeRRUpdate.docx; Total Pages: 28)

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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.

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
Xcel Energy	Xcel Energy Inc.
XES	Xcel Energy Services Inc.

LIST OF ATTACHMENTS

<u>Attachment</u>	<u>Description</u>
RHK-RR-UA (Updated Test Year)	Summary of XES Expenses to SPS by Affiliate Class and Billing Method (Filename: RHK-RR-UABCD.xlsx)
RHK-RR-UB(CD) (Updated Test Year)	XES Expenses by Affiliate Class, Activity, Billing Method, and FERC Account (Filename: RHK-RR-UABCD.xlsx)
RHK-RR-UC (Updated Test Year)	Exclusions from XES Expenses to SPS by Affiliate Class and FERC Account (Filename: RHK-RR-UABCD.xlsx)
RHK-RR-UD (Updated Test Year)	Pro Forma Adjustments to XES Expenses by Affiliate Class and FERC Account (Filename: RHK-RR-UABCD.xlsx)

**UPDATE TESTIMONY
OF
ROBERT H. KUNZE**

I. WITNESS IDENTIFICATION

1

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

3 A. My name is Robert H. Kunze. My business address is 1800 Larimer Street, Denver,
4 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 Direct of Strategy and
7 Planning, Supply Chain.

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 Robert H. Kunze who filed direct testimony on behalf of SPS**
12 **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 the my direct testimony filed on
12 February 8, 2021, the sections and subsections in this update testimony correspond
13 with the original sections and subsections in my direct testimony.

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

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

23 A. ***Affiliate Costs*** - The estimated Updated Test Year costs for the services of the
24 Supply Chain affiliate class that SPS sought to recover were \$357,509 (total SPS

1 before jurisdictional allocations, or “total company”). The actual Updated Test
2 Year costs for the services of the Supply Chain affiliate class that SPS seeks to
3 recover are \$389,071. Please refer to Attachments RHK-RR-UA through RHK-
4 RR-UD. In addition to providing updated SPS numbers, those attachments also
5 reflect the total updated XES class expenses for the Supply Chain affiliate class.
6 The actual costs are reasonable and necessary for the reasons I provided in my direct
7 testimony.

8 **Q. Were Attachments RHK-RR-UA through RHK-RR-UD prepared by you or**
9 **under your direct supervision and control?**

10 A. Attachments RHK-RR-UA through RHK-RR-UD were prepared as described by
11 SPS witness Ross L. Baumgarten. My staff and I have reviewed these attachments
12 and I believe them to be accurate. Although the information I have described also
13 is present in Mr. Baumgarten’s attachments, I have presented this information in
14 the attachments to my update testimony for the convenience of those reviewing it.

**III. UPDATED AFFILIATE EXPENSES FOR THE SUPPLY
CHAIN CLASS OF SERVICES**

A. Summary of Affiliate Expenses for the Supply Chain Class of Services

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

A. The following table summarizes the dollar amount of the actual Updated Test Year XES charges for the Supply Chain affiliate class.

Table RHK-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
Supply Chain	\$4,701,758	\$389,071	75.60%	24.40%

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

A. Attachments RHK-RR-UA through RHK-RR-UD present the updated information about the requested SPS affiliate expenses for the Supply Chain affiliate class. The detailed descriptions for Attachments RHK-RR-A through RHK-RR-D that were provided in my direct testimony remain applicable to these updated attachments.

Q. Are there updated exclusions for the Supply Chain affiliate class?

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

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 RHK-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 pro forma adjustments to SPS's per book expenses for the**
2 **Supply Chain affiliate class?**

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

9 **Q. Attachment RHK-RR-UD shows that you sponsor pro forma adjustments for**
10 **expenses for the Supply Chain affiliate class during the Updated Test Year**
11 **that result in a net decrease for the Supply Chain affiliate class of \$121.59.**
12 **Please explain the adjustments.**

13 A. The adjustments that I sponsor remove expenses for alcohol (a decrease of \$97.59),
14 for holiday party (a decrease of \$13.11), and for life events (a decrease of \$10.89).

15 **C. The Supply Chain Class of Services are Provided at a Reasonable**
16 **Cost**

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

18 A. In this section of my direct testimony, several numbers were based on estimates for
19 the Update Period. In this update testimony, I replace those estimates with actual
20 numbers, and explain that the actual costs for the Supply Chain affiliate class are
21 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 Supply Chain class, 77.68% 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.

8 *3. Cost Trends*

9 **Q. Please state the dollar amounts of the actual charges (per book) from XES to**
10 **SPS for the Supply Chain class of services for the three fiscal years preceding**
11 **the end of the Updated Test Year and the charges (per book) for the Updated**
12 **Test Year.**

13 A. The following table shows, for the fiscal years 2017, 2018, and 2019 (calendar
14 years), and for the Updated Test Year, the actual per book affiliate charges (Column
15 I on Attachment RHK-RR-UA) from XES to SPS for the services grouped in the
16 Supply Chain affiliate class:

17 **Table RHK-RR-U2**

	(Per Book) Charges Over Time				
Class of Services	2017	2018	2019	Updated Test Year (Estimated)	Updated Test Year (Actual)
Supply Chain	\$1,520,948	\$1,157,042	\$581,249	\$349,658	\$380,474

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Table RHK-RR-U4

Allocation Method	Estimated Percentage of XES charges to SPS/Amount (total company) in Direct Testimony	Actual Percentage of XES charges to SPS/Amount (total company) in Update Filing
Direct Biling	76.45% / \$273,301	75.60% / \$294,124
Assets, Revenues, and Number of Employees	5.27% / \$18,842	5.06% / \$21,801
Invoice Transactions	5.04% / \$18,014	4.59% / \$17,857
Number of Computers	2.97% / \$10,615	3.51% / \$13,639

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

3 A. Yes.

AFFIDAVIT

STATE OF COLORADO)
)
COUNTY OF ~~WELD~~)
 Broomfield

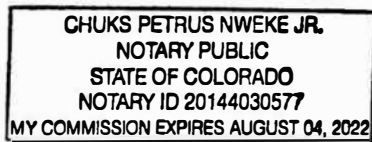
ROBERT H. KUNZE, first being sworn on his oath, states:

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.



ROBERT H. KUNZE

Subscribed and sworn to before me this 19th day of March 2021 by ROBERT H. KUNZE.





Notary Public, State of Colorado

My Commission Expires: August 04, 2022

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

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	Supply Chain	200063 - Executive - Corporate Governance	Assets/Revenue/No. of Employees	\$ 29,868.01	\$ 26,007.30	\$ 3,860.71	\$ (7.87)	\$ 3,852.84	\$ 68.26	\$ 3,921.10	1.01%
2	Supply Chain	200064 - Shareholder - Corporate Governance	Assets/Revenue/No. of Employees	45.22	39.42	5.80	(0.06)	5.74	0.13	5.87	0.00%
3	Supply Chain	200065 - Investor Relations - Corporate Governance	Assets/Revenue/No. of Employees	6,146.69	5,353.66	793.03	0.84	793.87	13.55	807.42	0.21%
4	Supply Chain	200066 - Accounting, Reporting & Tax - Corporate Governance	Assets/Revenue/No. of Employees	35,765.72	31,145.06	4,620.66	1.46	4,622.12	98.41	4,720.53	1.21%
5	Supply Chain	200067 - Audit Services - Corporate Governance	Assets/Revenue/No. of Employees	2,567.36	2,235.23	332.13	(0.96)	331.17	7.20	338.37	0.09%
6	Supply Chain	200068 - Corporate Finance, Treasury & Cash Management - Corporate Governance	Assets/Revenue/No. of Employees	1,043.94	909.31	134.63	(0.42)	134.21	2.78	136.99	0.04%
7	Supply Chain	200070 - Corporate Strategy & Business Development - Corporate Governance	Assets/Revenue/No. of Employees	283.01	246.50	36.51	(0.22)	36.29	0.79	37.08	0.01%
8	Supply Chain	200071 - Legal - Corporate Governance	Assets/Revenue/No. of Employees	8,125.67	7,076.08	1,049.59	(2.34)	1,047.25	22.16	1,069.41	0.27%
9	Supply Chain	200072 - Communications - Corporate Governance	Assets/Revenue/No. of Employees	4,057.38	3,533.50	523.88	(0.89)	522.99	11.07	534.06	0.14%
10	Supply Chain	200073 - Human Resources (HR) - Corporate Governance	Assets/Revenue/No. of Employees	893.58	778.04	115.54	(0.35)	115.19	2.72	117.91	0.03%
11	Supply Chain	200074 - Corporate Systems - Corporate Governance	Assets/Revenue/No. of Employees	37,418.23	32,581.58	4,836.65	(2.38)	4,834.27	109.19	4,943.46	1.27%
12	Supply Chain	200075 - Board of Directors - Corporate Governance	Assets/Revenue/No. of Employees	1,887.28	1,643.67	243.61	(0.28)	243.33	5.39	248.72	0.06%
13	Supply Chain	200076 - Xcel Foundation	Assets/Revenue/No. of Employees	49.22	42.86	6.36	-	6.36	(6.36)	-	0.00%
14	Supply Chain	200077 - Branding	Assets/Revenue/No. of Employees	4,248.94	3,696.72	552.22	(1.40)	550.82	11.05	561.87	0.14%
15	Supply Chain	200078 - Governmental Affairs	Assets/Revenue/No. of Employees	1,327.35	1,155.30	172.05	(0.07)	171.98	4.13	176.11	0.05%
16	Supply Chain	200079 - Federal Lobbying	Assets/Revenue/No. of Employees	3,515.22	3,058.69	456.53	(456.53)	-	-	-	0.00%

Southwestern Public Service Company

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

(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)	(I)	(J)	(K)	(L)
Line No.	Affiliate Class	Billing Method (Cost Center)	Allocation Method	Total XES Billings for Class to all Legal Entities (FERC Act. 400-935)	XES Billings for Class to all Legal Entities Except SPS (FERC Act. 400-935)	XES Billings for Class to SPS (Total Company) (FERC Act. 400-935)	Exclusions	Per Book	Pro Forms	Requested Amount (Total Company)	% of Class Charges
17	Supply Chain	200081 - Accounting, Reporting, & Taxes	Assets/Revenue/No. of Employees	0.43	0.37	0.06	-	0.06	0.00	0.06	0.00%
18	Supply Chain	200086 - Legal & Claims Services	Assets/Revenue/No. of Employees	411.14	350.92	60.22	(0.09)	60.13	1.40	61.53	0.02%
19	Supply Chain	200087 - Accounting, Reporting & Tax - Regulated	Assets/Revenue/No. of Employees	7,805.48	6,658.20	1,147.28	(3.21)	1,144.07	24.70	1,168.77	0.30%
20	Supply Chain	200088 - Accounting, Reporting, Tax & Audit Services - Regulated Electric	Assets/Revenue/No. of Employees	228.88	195.44	33.44	(0.21)	33.23	0.74	33.97	0.01%
21	Supply Chain	200090 - Risk Management - OpCo's & TransCo's	Assets/Revenue/No. of Employees	4,173.00	3,559.43	613.57	(1.11)	612.46	12.45	624.91	0.16%
22	Supply Chain	200092 - Corporate Strategy & Business Development	Assets/Revenue/No. of Employees	2,266.64	1,933.49	333.15	(0.30)	332.85	7.17	340.02	0.09%
23	Supply Chain	200093 - Legal - OpCo's & TransCo's	Assets/Revenue/No. of Employees	3,185.47	2,717.33	468.14	(1.13)	467.01	9.89	476.90	0.12%
24	Supply Chain	200094 - Supply Chain	Assets/Revenue/No. of Employees	86.69	75.32	11.37	-	11.37	(1.06)	10.31	0.00%
25	Supply Chain	200096 - Energy Markets - Business Services	Assets/Revenue/No. of Employees	9,289.51	7,923.95	1,365.56	(2.16)	1,363.40	29.24	1,392.64	0.36%
26	Supply Chain	200097 - Accounting and Finance Software Applications Maintenance	Assets/Revenue/No. of Employees	34.38	29.36	5.02	-	5.02	0.12	5.14	0.00%
27	Supply Chain	200104 - Accounting & Reporting - PSCo & SPS	Assets/Revenue/No. of Employees	220.10	153.82	66.28	(0.06)	66.22	1.61	67.83	0.02%
28	Supply Chain	200105 - Accounting & Reporting - NSPM & NSPW	Assets/Revenue/No. of Employees	180.81	180.81	-	-	-	-	-	0.00%
29	Supply Chain	200106 - Accounting & Reporting Electric - NSPM & NSPW	Assets/Revenue/No. of Employees	158.12	158.12	-	-	-	-	-	0.00%
30	Supply Chain	200107 - Legal - NSPM & NSPW	Assets/Revenue/No. of Employees	606.65	606.65	-	-	-	-	-	0.00%
31	Supply Chain	200108 - Advanced Metering Infrastructure (AMI)	No. of AMI Enabled Meters	2,313.65	2,313.65	-	-	-	-	-	0.00%

Southwestern Public Service Company

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

(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)	(I)	(J)	(K)	(L)
Line No.	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
32	Supply Chain	200111 - Enterprise Application Integration (EAI)	Average of a Select Set of Software Allocators	228.29	202.18	26.11	-	26.11	0.54	26.65	0.01%
33	Supply Chain	200112 - Mainframe Charges	Average of a Select Set of Software Allocators	159.90	149.01	10.89	-	10.89	0.31	11.20	0.00%
34	Supply Chain	200115 - Miscellaneous Applications	Average of All Software Percentages	71,875.23	64,222.19	7,653.04	(16.84)	7,636.20	155.16	7,791.36	2.00%
35	Supply Chain	200116 - Distribution Electric Supervision & Engineering (S&E) FERC 580	Electric Distribution Plant	955.01	840.38	114.63	(0.35)	114.28	2.57	116.85	0.03%
36	Supply Chain	200118 - Distribution Electric Load Dispatching/EMS FERC 581	Electric Distribution Plant	1,540.84	1,355.00	185.84	(0.64)	185.20	4.82	190.02	0.05%
37	Supply Chain	200119 - Distribution Electric & Gas Miscellaneous FERC 588 & 880	Electric Distribution Plant/ Gas Distribution Plant	815.13	744.35	70.78	(0.27)	70.51	1.56	72.07	0.02%
38	Supply Chain	200121 - Distribution Electric & Gas and Transmission Gas Miscellaneous FERC 588, 880, & 859	Electric Distribution Plant/ Gas Transmission Plant/ Gas Distribution Plant	111.32	102.34	8.98	(0.07)	8.91	0.20	9.11	0.00%
39	Supply Chain	200122 - Transmission Electric Supervision & Engineering (S&E) FERC 560	Electric Transmission Plant	7,171.52	5,004.51	2,167.01	(5.79)	2,161.22	48.94	2,210.16	0.57%
40	Supply Chain	200123 - Transmission Electric Reliability, Planning, & Standards Development FERC 561.5	Electric Transmission Plant	151.77	106.98	44.79	(1.06)	43.73	1.41	45.14	0.01%
41	Supply Chain	200124 - Transmission Electric Load Dispatch-Monitor and Operate Transmission System FERC 561.2	Electric Transmission Plant	1,239.85	863.81	376.04	(0.93)	375.11	8.31	383.42	0.10%

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
42	Supply Chain	200125 - Transmission Electric Supervision & Engineering (S&E) NSPM & NSPW FERC 560	Electric Transmission Plant	1,689.14	1,689.14	-	-	-	-	-	0.00%
43	Supply Chain	200126 - Utilities Group Administrative & General (A&G) FERC 921	Electric Transmission Plant/ Electric Distribution Plant/ Gas Transmission Plant/Gas Distribution Plant	1,836.36	1,532.59	303.77	(0.39)	303.38	6.75	310.13	0.08%
44	Supply Chain	200127 - Distribution Gas Supervision & Engineering (S&E) FERC 870	Gas Distribution Plant	1,552.10	1,552.10	-	-	-	-	-	0.00%
45	Supply Chain	200129 - Distribution Gas Meters and House Regulators FERC 878	Gas Distribution Plant	0.07	0.07	-	-	-	-	-	0.00%
46	Supply Chain	200130 - Transmission Gas Supervision & Engineering (S&E) FERC 850	Gas Transmission Plant	241.71	241.71	-	-	-	-	-	0.00%
47	Supply Chain	200131 - Distribution & Transmission Gas System Control and Load Dispatching FERC 851 & 871	Gas Transmission Plant/ Gas Distribution Plant	1,514.27	1,514.27	-	-	-	-	-	0.00%
48	Supply Chain	200132 - Payment and Reporting	Invoice Transactions	166,295.73	148,921.10	17,374.63	(18.35)	17,356.28	500.46	17,856.74	4.59%
49	Supply Chain	200134 - Proprietary Trading - Front/Mid Office FERC 557	Joint Operating Agreement Peak Hour Megawatt Load Ratio	3,249.67	2,553.99	695.68	(1.78)	693.90	15.43	709.33	0.18%
50	Supply Chain	200135 - Energy Supply Business Resources	MWH Generation	36.51	27.91	8.60	(0.02)	8.58	0.20	8.78	0.00%
51	Supply Chain	200136 - Energy Markets - Fuel	MWH Generation	293.58	224.19	69.39	(0.39)	69.00	1.44	70.44	0.02%
52	Supply Chain	200137 - Energy Supply Miscellaneous Power Expense FERC 506, 539, & 549	MWH Generation	222.10	170.49	51.61	-	51.61	0.98	52.59	0.01%

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
53	Supply Chain	200138 - Energy Supply Operation Supervision & Engineering (S&E) FERC 500, 535, & 546	MWH Generation	2,351.02	1,794.98	556.04	(0.51)	555.53	12.05	567.58	0.15%
54	Supply Chain	200146 - Energy Markets - Regulated Trading	MWH Hours Sold	157.96	116.54	41.42	(0.01)	41.41	0.96	42.37	0.01%
55	Supply Chain	200147 - Business Objects	No. of Business Objects	600.20	534.49	65.71	(0.24)	65.47	1.48	66.95	0.02%
56	Supply Chain	200148 - Business Systems	No. of Computers	101,093.43	87,725.24	13,368.19	(23.77)	13,344.42	294.87	13,639.29	3.51%
57	Supply Chain	200149 - Customer & Enterprise Solutions (CES)	No. of Computers/ No. of Customers/ No. of Employees	115.33	101.98	13.35	-	13.35	0.32	13.67	0.00%
58	Supply Chain	200151 - Customer Billing FERC 903	No. of Customer Bills	10,797.94	9,885.72	912.22	(2.47)	909.75	20.06	929.81	0.24%
59	Supply Chain	200152 - Customer Care 902	No. of Customers	13,438.04	12,507.53	930.51	(7.89)	922.62	20.67	943.29	0.24%
60	Supply Chain	200153 - Customer Safety Advertising & Information Costs	No. of Customers	10,729.33	9,985.31	744.02	(1.72)	742.30	16.15	758.45	0.19%
61	Supply Chain	200154 - Customer Service Information Technology (IT) FERC 903	No. of Customers	7,626.09	7,098.15	527.94	(4.53)	523.41	9.48	532.89	0.14%
62	Supply Chain	200155 - Customer Care FERC 903	No. of Customers	11,568.16	10,766.37	801.79	(1.52)	800.27	17.91	818.18	0.21%
63	Supply Chain	200156 - Customer Care FERC 901	No. of Customers	305.31	284.15	21.16	-	21.16	0.51	21.67	0.01%
64	Supply Chain	200162 - Call Logging and Quality Management (CL/QM) FERC 903	No. of Customers/ No. of Contacts	302.26	267.87	34.39	-	34.39	0.83	35.22	0.01%
65	Supply Chain	200163 - Employee Communications	No. of Employees	516.74	441.45	75.29	(0.11)	75.18	1.70	76.88	0.02%
66	Supply Chain	200164 - Payroll	No. of Employees	398.04	339.84	58.20	(0.01)	58.19	1.39	59.58	0.02%
67	Supply Chain	200165 - Employee Management Systems	No. of Employees	32,187.79	27,495.61	4,692.18	(6.37)	4,685.81	103.45	4,789.26	1.23%
68	Supply Chain	200166 - Human Resources (Diversity/Safety/Employee Relations)	No. of Employees	14,843.69	12,682.24	2,161.45	(3.44)	2,158.01	47.49	2,205.50	0.57%
69	Supply Chain	200167 - e-Business	No. of Employees	11.15	9.51	1.64	-	1.64	0.04	1.68	0.00%

Southwestern Public Service Company

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

(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)	(I)	(J)	(K)	(L)
Line No.	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
70	Supply Chain	200170 - Meter Reading and Monitoring Systems FERC 902	No. of Meters	4,973.95	4,640.42	333.53	(1.24)	332.29	7.44	339.73	0.09%
71	Supply Chain	200171 - Customer Resource System (CRS) FERC 903	No. of Meters/ No. of Contacts	59,565.78	52,869.36	6,696.42	(21.26)	6,675.16	148.97	6,824.13	1.75%
72	Supply Chain	200172 - Network	Phones/ Radios/ Computers	51,662.38	44,900.92	6,761.46	(10.15)	6,751.31	143.51	6,894.82	1.77%
73	Supply Chain	200176 - Marketing & Sales	Revenue	20,736.47	17,687.31	3,049.16	(3.60)	3,045.56	65.22	3,110.78	0.80%
74	Supply Chain	200177 - Rates & Regulation - Electric	Revenue	508.37	398.66	109.71	(0.71)	109.00	2.44	111.44	0.03%
75	Supply Chain	200178 - Rates & Regulation	Revenue	545.34	423.91	121.43	(0.13)	121.30	2.67	123.97	0.03%
76	Supply Chain	200180 - EMS-Shared (Energy Management System-SCADA) FERC 556, 561.2, & 581	Electric Production Plant/ Electric Transmission Plant/ Electric Distribution Plant	429.32	353.12	76.20	(0.81)	75.39	1.67	77.06	0.02%
77	Supply Chain	200181 - Energy Supply Environmental Policy & Services	Electric Production Plant/ Electric Transmission Plant/ Electric Distribution Plant/ Gas Transmission Plant/ Gas Distribution Plant	899.42	756.29	143.13	0.19	143.32	2.99	146.31	0.04%
78	Supply Chain	200184 - PowerPlan	Total Plant	971.95	824.53	147.42	(0.06)	147.36	3.39	150.75	0.04%
79	Supply Chain	Direct	Direct	3,925,038.68	3,636,090.98	288,947.70	(1,306.02)	287,641.68	6,482.65	294,124.33	75.60%
80	Supply Chain	Total		\$ 4,701,758.01	\$ 4,319,360.57	\$ 382,397.44	\$ (1,923.00)	\$ 380,474.44	\$ 8,596.14	\$ 389,070.58	100.00%
81	Total Witness Robert H. Kunze			\$ 4,701,758.01	\$ 4,319,360.57	\$ 382,397.44	\$ (1,923.00)	\$ 380,474.44	\$ 8,596.14	\$ 389,070.58	
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

Robert H. Kunze

Docket No. 51802

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

RHK-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	Supply Chain	417.1 - Expenses of nonutility operations	Below the Line	\$ (380.69)
2	Supply Chain	426.4 - Expenditures for certain civic, political and related activities	Below the Line	(1,069.78)
3	Supply Chain	426.5 - Other Deductions	Below the Line	(472.53)
4	Supply Chain Total			<u>\$ (1,923.00)</u>
5	Total Witness Robert H. Kunze			<u><u>\$ (1,923.00)</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	Supply Chain	500 - Operation supervision and engineering	3% Wage Adjustment	Stephanie N. Niemi/Michael P. Deselich	\$ 12.39
2	Supply Chain	500 - Operation supervision and engineering	Business Area Adjustment	Robert H. Kunze	(0.10)
3	Supply Chain	501 - Fuel	3% Wage Adjustment	Stephanie N. Niemi/Michael P. Deselich	16.73
4	Supply Chain	501 - Fuel	Business Area Adjustment	Robert H. Kunze	(0.13)
5	Supply Chain	502 - Steam expenses	3% Wage Adjustment	Stephanie N. Niemi/Michael P. Deselich	93.19
6	Supply Chain	502 - Steam expenses	Business Area Adjustment	Robert H. Kunze	(0.65)
7	Supply Chain	505 - Electric expenses	3% Wage Adjustment	Stephanie N. Niemi/Michael P. Deselich	116.54
8	Supply Chain	505 - Electric expenses	Business Area Adjustment	Robert H. Kunze	(0.96)
9	Supply Chain	506 - Miscellaneous steam power expenses	3% Wage Adjustment	Stephanie N. Niemi/Michael P. Deselich	326.06
10	Supply Chain	506 - Miscellaneous steam power expenses	Business Area Adjustment	Robert H. Kunze	(5.11)
11	Supply Chain	510 - Maintenance supervision and engineering	3% Wage Adjustment	Stephanie N. Niemi/Michael P. Deselich	13.56
12	Supply Chain	510 - Maintenance supervision and engineering	Business Area Adjustment	Robert H. Kunze	(0.07)
13	Supply Chain	511 - Maintenance of structures	3% Wage Adjustment	Stephanie N. Niemi/Michael P. Deselich	210.08
14	Supply Chain	511 - Maintenance of structures	Business Area Adjustment	Robert H. Kunze	(2.14)
15	Supply Chain	512 - Maintenance of boiler plant	3% Wage Adjustment	Stephanie N. Niemi/Michael P. Deselich	384.37
16	Supply Chain	512 - Maintenance of boiler plant	Business Area Adjustment	Robert H. Kunze	(4.85)
17	Supply Chain	513 - Maintenance of electric plant	3% Wage Adjustment	Stephanie N. Niemi/Michael P. Deselich	286.78
18	Supply Chain	513 - Maintenance of electric plant	Business Area Adjustment	Robert H. Kunze	(3.14)

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)
19	Supply Chain	514 - Maintenance of miscellaneous steam plant	3% Wage Adjustment	Stephanie N. Niemi/Michael P. Deselich	298.47
20	Supply Chain	514 - Maintenance of miscellaneous steam plant	Business Area Adjustment	Robert H. Kunze	(2.97)
21	Supply Chain	546 - Operation supervision and engineering	3% Wage Adjustment	Stephanie N. Niemi/Michael P. Deselich	6.65
22	Supply Chain	546 - Operation supervision and engineering	Business Area Adjustment	Robert H. Kunze	(0.01)
23	Supply Chain	548 - Generation Expenses	3% Wage Adjustment	Stephanie N. Niemi/Michael P. Deselich	0.11
24	Supply Chain	549 - Miscellaneous other power generation expenses	3% Wage Adjustment	Stephanie N. Niemi/Michael P. Deselich	366.47
25	Supply Chain	549 - Miscellaneous other power generation expenses	Business Area Adjustment	Robert H. Kunze	(4.93)
26	Supply Chain	552 - Maintenance of structures	3% Wage Adjustment	Stephanie N. Niemi/Michael P. Deselich	11.10
27	Supply Chain	552 - Maintenance of structures	Business Area Adjustment	Robert H. Kunze	(0.03)
28	Supply Chain	553 - Maintenance of generating and electric plant	3% Wage Adjustment	Stephanie N. Niemi/Michael P. Deselich	57.33
29	Supply Chain	553 - Maintenance of generating and electric plant	Business Area Adjustment	Robert H. Kunze	(0.36)
30	Supply Chain	554 - Maintenance of miscellaneous other power generation plant	3% Wage Adjustment	Stephanie N. Niemi/Michael P. Deselich	223.90
31	Supply Chain	554 - Maintenance of miscellaneous other power generation plant	Business Area Adjustment	Robert H. Kunze	(3.12)
32	Supply Chain	556 - System control and load dispatching	3% Wage Adjustment	Stephanie N. Niemi/Michael P. Deselich	2.28

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)
33	Supply Chain	557 - Other expenses	3% Wage Adjustment	Stephanie N. Niemi/Michael P. Deselich	18.31
34	Supply Chain	557 - Other expenses	Business Area Adjustment	Robert H. Kunze	(0.04)
35	Supply Chain	560 - Operation supervision and engineering	3% Wage Adjustment	Stephanie N. Niemi/Michael P. Deselich	126.26
36	Supply Chain	560 - Operation supervision and engineering	Business Area Adjustment	Robert H. Kunze	(6.50)
37	Supply Chain	561.2 - Load dispatch-Monitor and operate transmiss system	3% Wage Adjustment	Stephanie N. Niemi/Michael P. Deselich	25.98
38	Supply Chain	561.2 - Load dispatch-Monitor and operate transmiss system	Business Area Adjustment	Robert H. Kunze	(0.19)
39	Supply Chain	561.5 - Reliability planning and standards development	3% Wage Adjustment	Stephanie N. Niemi/Michael P. Deselich	1.54
40	Supply Chain	561.5 - Reliability planning and standards development	Business Area Adjustment	Robert H. Kunze	(0.08)
41	Supply Chain	561.6 - Transmission service studies	3% Wage Adjustment	Stephanie N. Niemi/Michael P. Deselich	3.58
42	Supply Chain	561.6 - Transmission service studies	Business Area Adjustment	Robert H. Kunze	(0.01)
43	Supply Chain	562 - Station expenses	3% Wage Adjustment	Stephanie N. Niemi/Michael P. Deselich	10.47
44	Supply Chain	562 - Station expenses	Business Area Adjustment	Robert H. Kunze	(0.12)
45	Supply Chain	563 - Overhead line expenses	3% Wage Adjustment	Stephanie N. Niemi/Michael P. Deselich	109.38
46	Supply Chain	563 - Overhead line expenses	Business Area Adjustment	Robert H. Kunze	(0.29)
47	Supply Chain	566 - Miscellaneous transmission expenses	3% Wage Adjustment	Stephanie N. Niemi/Michael P. Deselich	168.32
48	Supply Chain	566 - Miscellaneous transmission expenses	Business Area Adjustment	Robert H. Kunze	(1.75)

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)
49	Supply Chain	570 - Maintenance of station equipment	3% Wage Adjustment	Stephanie N. Niemi/Michael P. Deselich	49.01
50	Supply Chain	570 - Maintenance of station equipment	Business Area Adjustment	Robert H. Kunze	(0.39)
51	Supply Chain	571 - Maintenance of overhead lines	3% Wage Adjustment	Stephanie N. Niemi/Michael P. Deselich	38.85
52	Supply Chain	571 - Maintenance of overhead lines	Business Area Adjustment	Robert H. Kunze	(4.04)
53	Supply Chain	575.1 - Operation Supervision	3% Wage Adjustment	Stephanie N. Niemi/Michael P. Deselich	0.60
54	Supply Chain	580 - Operation supervision and engineering	3% Wage Adjustment	Stephanie N. Niemi/Michael P. Deselich	148.25
55	Supply Chain	580 - Operation supervision and engineering	Business Area Adjustment	Robert H. Kunze	(1.36)
56	Supply Chain	581 - Load dispatching	3% Wage Adjustment	Stephanie N. Niemi/Michael P. Deselich	10.91
57	Supply Chain	581 - Load dispatching	Business Area Adjustment	Robert H. Kunze	(0.04)
58	Supply Chain	582 - Distribution Operation Station Expenses	3% Wage Adjustment	Stephanie N. Niemi/Michael P. Deselich	248.97
59	Supply Chain	582 - Distribution Operation Station Expenses	Business Area Adjustment	Robert H. Kunze	(3.33)
60	Supply Chain	583 - Overhead line expenses	3% Wage Adjustment	Stephanie N. Niemi/Michael P. Deselich	113.28
61	Supply Chain	583 - Overhead line expenses	Business Area Adjustment	Robert H. Kunze	(1.27)
62	Supply Chain	584 - Underground Line Expense	3% Wage Adjustment	Stephanie N. Niemi/Michael P. Deselich	1.93
63	Supply Chain	584 - Underground Line Expense	Business Area Adjustment	Robert H. Kunze	(0.01)
64	Supply Chain	585 - Street Lighting and Signal System Expenses	3% Wage Adjustment	Stephanie N. Niemi/Michael P. Deselich	3.82

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)
65	Supply Chain	585 - Street Lighting and Signal System Expenses	Business Area Adjustment	Robert H. Kunze	(0.03)
66	Supply Chain	586 - Meter expenses	3% Wage Adjustment	Stephanie N. Niemi/Michael P. Deselich	67.56
67	Supply Chain	586 - Meter expenses	Business Area Adjustment	Robert H. Kunze	(1.19)
68	Supply Chain	587 - Distribution Operation Customer Installations expenses	3% Wage Adjustment	Stephanie N. Niemi/Michael P. Deselich	0.24
69	Supply Chain	588 - Miscellaneous distribution expenses	3% Wage Adjustment	Stephanie N. Niemi/Michael P. Deselich	1,265.12
70	Supply Chain	588 - Miscellaneous distribution expenses	Business Area Adjustment	Robert H. Kunze	(21.13)
71	Supply Chain	592 - Distribution Maintenance of Station Equipment	3% Wage Adjustment	Stephanie N. Niemi/Michael P. Deselich	20.97
72	Supply Chain	592 - Distribution Maintenance of Station Equipment	Business Area Adjustment	Robert H. Kunze	(0.16)
73	Supply Chain	593 - Maintenance of overhead lines	3% Wage Adjustment	Stephanie N. Niemi/Michael P. Deselich	309.51
74	Supply Chain	593 - Maintenance of overhead lines	Business Area Adjustment	Robert H. Kunze	(9.85)
75	Supply Chain	594 - Maintenance of Underground Lines	3% Wage Adjustment	Stephanie N. Niemi/Michael P. Deselich	0.76
76	Supply Chain	594 - Maintenance of Underground Lines	Business Area Adjustment	Robert H. Kunze	(0.01)
77	Supply Chain	596 - Maintenance of Street Lighting and Signal Systems	3% Wage Adjustment	Stephanie N. Niemi/Michael P. Deselich	18.88
78	Supply Chain	596 - Maintenance of Street Lighting and Signal Systems	Business Area Adjustment	Robert H. Kunze	(0.16)
79	Supply Chain	598 - Maintenance of Miscellaneous Distribution Plant	3% Wage Adjustment	Stephanie N. Niemi/Michael P. Deselich	0.00

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)
80	Supply Chain	901 - Supervision	3% Wage Adjustment	Stephanie N. Niemi/Michael P. Deselich	0.51
81	Supply Chain	902 - Meter reading expenses	3% Wage Adjustment	Stephanie N. Niemi/Michael P. Deselich	335.93
82	Supply Chain	902 - Meter reading expenses	Business Area Adjustment	Robert H. Kunze	(7.36)
83	Supply Chain	903 - Customer records and collection expenses	3% Wage Adjustment	Stephanie N. Niemi/Michael P. Deselich	279.69
84	Supply Chain	903 - Customer records and collection expenses	Business Area Adjustment	Robert H. Kunze	(2.89)
85	Supply Chain	905 - Miscellaneous Customer Accounts Expenses	3% Wage Adjustment	Stephanie N. Niemi/Michael P. Deselich	5.45
86	Supply Chain	905 - Miscellaneous Customer Accounts Expenses	Business Area Adjustment	Robert H. Kunze	(0.01)
87	Supply Chain	908 - Customer assistance expenses	3% Wage Adjustment	Stephanie N. Niemi/Michael P. Deselich	42.21
88	Supply Chain	908 - Customer assistance expenses	Business Area Adjustment	Robert H. Kunze	(0.92)
89	Supply Chain	910 - Miscellaneous customer service and informational expenses	3% Wage Adjustment	Stephanie N. Niemi/Michael P. Deselich	2.89
90	Supply Chain	912 - Sales Demo & Sales	3% Wage Adjustment	Stephanie N. Niemi/Michael P. Deselich	7.14
91	Supply Chain	912 - Sales Demo & Sales	Business Area Adjustment	Robert H. Kunze	(0.03)
92	Supply Chain	916 - Miscellaneous Sales Expenses	3% Wage Adjustment	Stephanie N. Niemi/Michael P. Deselich	0.28
93	Supply Chain	920 - Administrative and general salaries	3% Wage Adjustment	Stephanie N. Niemi/Michael P. Deselich	2,656.13
94	Supply Chain	920 - Administrative and general salaries	Foundation	William A. Grant	(5.30)
95	Supply Chain	921 - Office supplies and expenses	3% Wage Adjustment	Stephanie N. Niemi/Michael P. Deselich	183.98

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)
96	Supply Chain	921 - Office supplies and expenses	Business Area Adjustment	Robert H. Kunze	(29.29)
97	Supply Chain	921 - Office supplies and expenses	Foundation	William A. Grant	(0.21)
98	Supply Chain	923 - Outside services employed	Foundation	William A. Grant	(0.85)
99	Supply Chain	925 - Injuries & Damages	3% Wage Adjustment	Stephanie N. Niemi/Michael P. Deselich	(0.03)
100	Supply Chain	928 - Regulatory Commission Expenses	3% Wage Adjustment	Stephanie N. Niemi/Michael P. Deselich	95.43
101	Supply Chain	928 - Regulatory Commission Expenses	Business Area Adjustment	Robert H. Kunze	(0.54)
102	Supply Chain	930.1 - General advertising expenses	Advertising	Stephanie N. Niemi	(79.31)
103	Supply Chain	930.2 - Miscellaneous general expenses	3% Wage Adjustment	Stephanie N. Niemi/Michael P. Deselich	5.25
104	Supply Chain	930.2 - Miscellaneous general expenses	Business Area Adjustment	Robert H. Kunze	(0.02)
105	Supply Chain Total				\$ 8,596.14
106	Total Witness Robert H. Kunze				\$ 8,596.14
	Amounts may not add or tie to other schedules due to rounding				