

DOCKET NO. 51802

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

**UPDATE TESTIMONY
of
SHAWN M. WHITE**

on behalf of

SOUTHWESTERN PUBLIC SERVICE COMPANY

(Filename: WhiteRRUpdate.docx; Total Pages: 23)

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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.

Attachment SMW-RR-UC (*filename: SMW-RR-UABCD.xlsx*)..... 22

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GLOSSARY OF ACRONYMS AND DEFINED TERMS

<u>Acronym/Defined Term</u>	<u>Meaning</u>
DSM	Demand Side Management
EE	Energy Efficiency
LM	Load Management
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>
SMW-RR-U2	Updated SPS Energy Efficiency and Load Management Costs (Filename: SMW-RR-U2.xlsx)
SMW-RR-UA (Updated Test Year)	Summary of XES Expenses to SPS by Affiliate Class and Billing Method (Filename: SMW-RR-UABCD.xlsx)
SMW-RR-UB(CD) (Updated Test Year)	XES Expenses by Affiliate Class, Activity, Billing Method, and FERC Account (Filename: SMW-RR-UABCD.xlsx)
SMW-RR-UC (Updated Test Year)	Exclusions from XES Expenses to SPS by Affiliate Class and FERC Account (Filename: SMW-RR-UABCD.xlsx)
SMW-RR-UD (Updated Test Year)	Pro Forma Adjustments to XES Expenses by Affiliate Class and FERC Account (Filename: SMW-RR-UABCD.xlsx)

**UPDATE TESTIMONY
OF
SHAWN M. WHITE**

I. WITNESS IDENTIFICATION

1

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

3 A. My name is Shawn M. White. My business address is 414 Nicollet Mall,
4 Minneapolis, Minnesota 55401.

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

6 A. I am employed by Xcel Energy Services Inc. (“XES”) as Director of the Demand-
7 Side Management (“DSM”) Regulatory Strategy & Financial Operations group.

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 Shawn M. White 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 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 Regarding the native SPS Energy Efficiency ("EE") and Load Management
15 ("LM") costs recovered through base rates that I support, my update testimony
16 includes Attachment SMW-RR-U2, which replaces the estimated costs that I
17 provided in my direct testimony for the Updated Test Year with actual costs.

18 Regarding the Marketing affiliate costs I support, my direct testimony
19 provided actual figures for October and November 2020 and estimated figures for
20 December 2020 based on the forecasted budget. In this update testimony, I replace
21 the December 2020 estimates with actuals. In addition, the October through
22 December 2020 expenses have now gone through the full pro forma adjustment
23 review process. Thus, I provide updated figures for those Update Period expenses.

1 My update testimony includes Attachments SMW-RR-UA through SMW-RR-UD
2 in support of the Marketing affiliate costs I support.

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

4 A. *Native Costs* – The amounts included in Attachment SMW-RR-U2 represent at a
5 total company level (total SPS before jurisdictional allocations, or “total
6 company”), reasonable and necessary costs incurred directly by SPS to support
7 SPS’s ability to provide safe and reliable electric service to its Texas retail
8 customers. I recommend the Public Utility Commission of Texas approve those
9 costs for the reasons discussed in my direct testimony.

10 *Affiliate Costs* – The estimated Updated Test Year costs for the services of the
11 Marketing affiliate class that SPS sought to recover were \$939,490 (total company).
12 The actual Updated Test Year costs for the services of the Marketing affiliate class
13 that SPS seeks to recover are \$939,366. Please refer to Attachments SMW-RR-UA
14 through SMW-RR-UD. In addition to providing updated SPS numbers, those
15 attachments also reflect the total updated XES class expenses for the Marketing
16 affiliate class. The actual costs are reasonable and necessary for the reasons I
17 provided in my direct testimony.

18 **Q. Were Attachments SMW-RR-U2 and SMW-RR-UA through SMW-RR-UD**
19 **prepared by you or under your direct supervision and control?**

20 A. Attachment SMW-RR-U2 was prepared by SPS witness Stephanie N. Niemi and
21 her staff and is based on the cost of service study. My staff and I have reviewed
22 this attachment, and I believe it to be accurate. Attachments SMW-RR-UA through
23 SMW-RR-UD were prepared as described by SPS witness Ross L. Baumgarten.

1 My staff and I have reviewed these attachments and I believe them to be accurate.
2 Although the information I have described also is present in these other witnesses'
3 attachments, I have presented this information in the attachments to my update
4 testimony for the convenience of those reviewing it.

**III. UPDATED AFFILIATE EXPENSES FOR THE
MARKETING CLASS OF SERVICES**

A. Summary of Affiliate Expenses for the Marketing 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 Marketing affiliate class?

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

Table SMW-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
Marketing	\$9,636,028	\$939,366	4.27%	95.72%

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

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

Q. Are there updated exclusions for the Marketing affiliate class?

A. Yes. The actual exclusions are provided on Attachment SMW-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 SMW-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 **Marketing 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 SMW-RR-UA, Column J, and on
6 Attachment SMW-RR-UB, Column M. The details for the pro forma adjustments,
7 including the witness or witnesses who sponsor each pro forma adjustment, are
8 provided in Attachment SMW-RR-UD.

9 **Q. Attachment SMW-RR-UD shows that you sponsor pro forma adjustments for**
10 **expenses for the Marketing affiliate class during the Updated Test Year result**
11 **in a net decrease for the Marketing affiliate class of \$10,845.26. Please explain**
12 **the adjustments.**

13 A. The adjustments that I sponsor remove alcohol charges (a decrease of \$219.69),
14 costs not benefitting SPS (a decrease of \$525.11), costs associated with life events
15 (a decrease of \$117.34), and costs associated with employee recognition (a decrease
16 of \$9,983.12).

17 **C. The Marketing Class of Services are Provided at a Reasonable Cost**

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

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

1 *1. 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 Marketing class, 43.70% 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, the majority
8 of the remaining costs for this class were for goods or services procured by contract.
9 Xcel Energy's Supply Chain organization is responsible for the sourcing and
10 purchasing of goods and services needed by SPS, as well as the review and
11 processing of payments to vendors. SPS witness Robert H. Kunze provides
12 testimony about these functions and demonstrates that the Supply Chain processes
13 and controls 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 **Marketing class of services for the three years preceding the Updated Test**
17 **Year and for the Updated Test Year.**

18 A. Table SMW-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 SMW-RR-UA.

21 **Table SMW-RR-U2**

	(Per Book) Charges Over Time				
Class of Services	2017	2018	2019	Updated Test Year (Estimated)	Updated Test Year (Actual)
Marketing	\$1,098,363	\$1,097,076	\$864,442	\$934,394	\$938,315

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

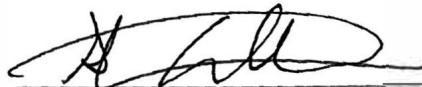
2 **A.** Yes.

AFFIDAVIT

STATE OF MINNESOTA)
)
COUNTY OF HENNEPIN)

SHAWN M. WHITE, 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.



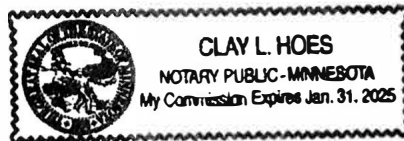
SHAWN M. WHITE

Subscribed and sworn to before me this 17 day of March 2021 by SHAWN M. WHITE.



Notary Public, State of Minnesota

My Commission Expires: 01/31/2025



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

Updated SPS Energy Efficiency and
Load Management Costs

Line No.	FERC Acct	Account Description	Native SPS O&M Expense through the Update Period (Jan '20-Dec '20)	Test Year Affiliate O&M Expense (Jan '20-Dec '20)	Total Company Requested O&M
Production					
1	500	Operation Supervision and Engineering	\$ 1,517,241	\$ 2,098,185	\$ 3,615,426
2	501.35	Coal Non-Mine; Non-Freight	\$ 32,828,421	\$ -	\$ 32,828,421
3	507.70	Coal Ash Sales	\$ (1,058,626)	\$ 1,536,346	\$ 477,719
4	502	Steam Expenses	\$ 11,136,654	\$ 306	\$ 11,136,960
5	505	Electric Expenses	\$ 9,191,610	\$ (1)	\$ 9,191,609
6	506	Miscellaneous Steam Power Expenses	\$ 8,734,628	\$ 3,968,138	\$ 12,702,766
7	507	Rents	\$ (336,163)	\$ 3,325,979	\$ 2,989,816
8	509	Steam Operation SO2 Allowance Expense	\$ -	\$ -	\$ -
9	509.02	Allowances - NM Nox Expense Amortz	\$ 34,908	\$ -	\$ 34,908
10	510	Maintenance Supervision and Engineering	\$ 392,616	\$ 141,553	\$ 534,169
11	511	Maintenance of Structures	\$ 3,855,605	\$ 4,641	\$ 3,860,246
12	512	Maintenance of Boiler Plant	\$ 12,763,158	\$ 884,336	\$ 13,647,494
13	513	Maintenance of Electric Plant	\$ 6,487,016	\$ 411,080	\$ 6,898,096
14	514	Maintenance of Miscellaneous Steam Plant	\$ 9,786,531	\$ 3,330	\$ 9,789,861
15	546	Operation Supervision and Engineering	\$ 13,703	\$ 410,582	\$ 424,285
16	546W	Operation Supervision and Engineering Wind	\$ 39,160	\$ 59,436	\$ 98,596
17	548	Generation Expenses	\$ 299,285	\$ -	\$ 299,285
18	549	Misc Other Power Generation Expenses	\$ 356,713	\$ 428,568	\$ 785,280
19	549W	Misc Other Power Generation Expenses Wind	\$ 8,485,357	\$ -	\$ 8,485,357
20	550	Rents	\$ (5,103)	\$ 364,836	\$ 359,732
21	550W	Rents Wind	\$ 5,303,789	\$ -	\$ 5,303,789
22	551	Maintenance Supervision and Engineering	\$ (11,461)	\$ 449,280	\$ 437,819
23	552	Maintenance of Structures	\$ 230,305	\$ (0)	\$ 230,305
24	553	Maintenance of Generating and Electric Equipment	\$ 692,966	\$ 417,635	\$ 1,110,601
25	553W	Maintenance of Generating and Electric Equipment Wind	\$ 4,388,789	\$ 1,256	\$ 4,390,045
26	554	Maintenance of Misc Other Power Generation Plant	\$ 45,238	\$ (2)	\$ 45,236
27	554W	Maintenance of Misc Other Power Generation Plant Wind	\$ 3,657,398	\$ -	\$ 3,657,398
28	556	System Control and Load Dispatching	\$ -	\$ 1,042,838	\$ 1,042,838
29	557	Purchased Power Other	\$ (893,980)	\$ 1,868,299	\$ 974,319
30	557.90	REC Costs	\$ 4,110,497	\$ -	\$ 4,110,497
31	Total Production O&M Expense		\$ 122,046,254	\$ 17,416,618	\$ 134,159,083

Southwestern Public Service Company

Updated SPS Energy Efficiency and
Load Management Costs

			Native SPS O&M	Test Year		
Line	FERC		Expense through the	Affiliate O&M		Total Company
No.	Acct	Account Description	Update Period	Expense		Requested O&M
			(Jan '20-Dec '20)	(Jan '20-Dec '20)		
Transmission						
32	560	Operation Supervision and Engineering	\$ 1,313,086	\$ 6,480,566	\$	7,793,651
33	561	Load Dispatch - Reliability	\$ (921)	\$ -	\$	(921)
34	561	Load Dispatch - Reliability	\$ 870	\$ -	\$	870
35	561	Load Dispatch - Monitor and Operate Trans. System	\$ 2,067,224	\$ 1,196,249	\$	3,263,473
36	561	Scheduling, System Control and Dispatching Services	\$ 3,797,900	\$ -	\$	3,797,900
37	561.4W	Scheduling, System Control and Dispatching Services - Wholesale	\$ 1,085,513	\$ -	\$	1,085,513
38	562	Reliability, Planning and Standards Development	\$ -	\$ 15,007	\$	15,007
39	562	Transmission Service Studies	\$ (6,427)	\$ 21,195	\$	14,768
40	562	Generation Interconnection Studies	\$ (23,396)	\$ 149,923	\$	126,527
41	562	Reliability Planning and Standards Development Services	\$ 2,881,351	\$ -	\$	2,881,351
42	561.8W	Reliability Planning and Standards Development Services - Wholesale	\$ 474,912	\$ -	\$	474,912
43	562	Station Expenses	\$ 1,493,479	\$ 43	\$	1,493,522
44	563	Overhead Line Expenses	\$ 2,155,178	\$ 3,035	\$	2,158,213
45	565	Transmission of Others	\$ 266,590	\$ -	\$	266,590
46	565	Wheeling Lamar DC Tie	\$ -	\$ -	\$	-
47	565	Wheeling Meter Charges	\$ 464,397	\$ -	\$	464,397
48	565	Wheeling Miscellaneous	\$ 31,189	\$ -	\$	31,189
49	565	Wheeling Schedule 11	\$ 107,224,348	\$ -	\$	107,224,348
50	565	Wheeling Schedule 11 - Wholesale	\$ 30,634,304	\$ -	\$	30,634,304
51	565	Wheeling Schedule 12	\$ 2,013,194	\$ -	\$	2,013,194
52	565	Wheeling Schedule 12 - Wholesale	\$ 486,620	\$ -	\$	486,620
53	565	Wheeling Schedule 1 - Wholesale	\$ 464,620	\$ -	\$	464,620
54	565	Wheeling Schedule 2	\$ 125,465	\$ -	\$	125,465
55	565	W-Wheeling Schedule 2 - Wholesale	\$ 34,544	\$ -	\$	34,544
56	565	Wheeling Schedule 9	\$ 8,990,528	\$ -	\$	8,990,528
57	565	Wheeling Schedule 9 - Wholesale	\$ 25,522,668	\$ -	\$	25,522,668
58	565	Z2 Direct Assigned Upgrade Charge	\$ 245,782	\$ -	\$	245,782
59	565	Z2 Direct Assigned Upgrade Charge - Wholesale	\$ 16,400	\$ -	\$	16,400
60	565	Z2 Schedule 11 Charges	\$ -	\$ -	\$	-
61	565	Z2 Schedule 11 Charges - Wholesale	\$ -	\$ -	\$	-
62	566	Misc Transmission Expenses	\$ 2,124,599	\$ 1,258,542	\$	3,383,141
63	567	Rents	\$ 77,837	\$ 1,512,456	\$	1,590,293
64	569	Transmission Mtce of Structures	\$ -	\$ -	\$	-
65	568	Maintenance Supervision and Engineering	\$ -	\$ -	\$	-
66	570	Maintenance of Station Equipment	\$ 1,568,565	\$ (0)	\$	1,568,565
67	571	Maintenance of Overhead Lines	\$ 661,726	\$ 47,409	\$	709,135
68	Sub-Total Transmission O&M Expenses		\$ 196,192,147	\$ 10,684,425	\$	206,609,112
Regional Market Expenses						
69	575.1	Operation Supervision	\$ 13,322	\$ 142,932	\$	156,254
70	575.2	Day-Ahead and Real-Time Market Administration	\$ -	\$ 288,869	\$	288,869
71	575.5	Ancillary Services Market Administration	\$ -	\$ 13,813	\$	13,813
72	575.6	Market Monitoring and Compliance	\$ -	\$ 24,160	\$	24,160
73	575.7	Market Admin, Monitoring, and Compliance Services	\$ 6,408,957	\$ -	\$	6,408,957
74	575.7W	Market Admin, Monitoring, and Compliance Services - Wholesale	\$ 1,831,803	\$ -	\$	1,831,803
75	575.8	Regional Market Rents	\$ (3,393)	\$ 38,523	\$	35,130
76	Total Regional Market Expenses		\$ 8,250,689	\$ 508,298	\$	8,758,987
77	Total Transmission O&M Expenses		\$ 204,442,836	\$ 11,192,722	\$	215,368,099

Southwestern Public Service Company

Updated SPS Energy Efficiency and
Load Management Costs

Line No.	FERC Acct	Account Description	Native SPS O&M Expense through the Update Period (Jan '20-Dec '20)	Test Year Affiliate O&M Expense (Jan '20-Dec '20)	Total Company Requested O&M
Distribution					
78	580	Operation Supervision and Engineering	\$ 4,320,990	\$ 570,941	\$ 4,891,931
79	581	Load Dispatching	\$ 17,320	\$ 324,920	\$ 342,240
80	582	Station Expenses	\$ 993,289	\$ (3)	\$ 993,286
81	583	Overhead Line Expenses	\$ 951,616	\$ 84,308	\$ 1,035,924
82	584	Underground Line Expenses	\$ 828,061	\$ (0)	\$ 828,061
83	585	Street Lighting and Signal Systems Expenses	\$ 539,851	\$ 31,829	\$ 571,680
84	586	Meter Expenses	\$ 1,869,842	\$ 155,078	\$ 2,024,920
85	587	Customer Installations Expenses	\$ 591,615	\$ 233	\$ 591,848
86	588	Misc Distribution Expense	\$ 6,066,963	\$ 1,891,816	\$ 7,958,779
87	589	Rents	\$ 298,621	\$ 2,115,935	\$ 2,414,556
88	590	Maintenance Supervision and Engineering	\$ -	\$ 26,186	\$ 26,186
89	591	Maintenance of Structures	\$ (1)	\$ -	\$ (1)
90	592	Maintenance of Station Equipment	\$ 705,815	\$ 3,132	\$ 708,947
91	593	Maintenance of Overhead Lines	\$ 8,642,103	\$ 254,910	\$ 8,897,014
92	594	Maintenance of Underground Lines	\$ 53,993	\$ (0)	\$ 53,993
93	595	Maintenance of Line Transformers	\$ -	\$ -	\$ -
94	596	Maintenance of Street Lighting and Signal Systems	\$ 314,957	\$ (0)	\$ 314,956
95	597	Maintenance of Meters	\$ 57,366	\$ -	\$ 57,366
96	598	Maintenance of Misc Distribution Plant	\$ 14,530	\$ -	\$ 14,530
97		Total Distribution O&M Expenses	\$ 26,266,931	\$ 5,459,285	\$ 31,726,216
Customer Accounts					
98	901	Supervision	\$ -	\$ 28,508	\$ 28,508
99	902	Meter Reading Expenses	\$ 4,356,976	\$ 628,154	\$ 4,985,130
100	903	Customer Records and Collection Expenses	\$ 2,717,747	\$ 4,400,676	\$ 7,118,423
101	904	Uncollectible Expenses	\$ 6,464,353	\$ -	\$ 6,464,353
102	904	Uncollectible Expenses	\$ (230,332)	\$ -	\$ (230,332)
	905	Customer Accounts Miscellaneous	\$ 101,982	\$ 78,576	\$ 180,558
103		DEPINT Customer Deposit Interest Expense	\$ 44,060	\$ -	\$ 44,060
104		Total Customer Accounts Expense	\$ 13,454,785	\$ 5,135,914	\$ 18,410,142
Customer Service					
105	908.00	Customer Assistance Expense	\$ 2,277,342	\$ 76,128	\$ 2,353,470
106	908.00	Historical EE Amortization	\$ -	\$ -	\$ -
107	908.01	EE Amortization - Texas	\$ -	\$ -	\$ -
108	908.03	EE Amortization - New Mexico	\$ -	\$ -	\$ -
109	908.04	SaversSwitch	\$ 613,243	\$ 4,867	\$ 618,109
110	909.10	Informational and Instructional Advertising Expense	\$ 4,059	\$ -	\$ 4,059
111	910.00	Miscellaneous Customer Service Expense	\$ 65,107	\$ 43,893	\$ 109,000
112		Total Customer Service Expense	\$ 2,959,750	\$ 124,888	\$ 3,084,639
Sales					
112	912.00	Demonstration and Selling Expense-Economic Development	\$ 231,661	\$ 60,420	\$ 292,082
113	916.00	Miscellaneous Sales Expense	\$ 6,894	\$ 4,144	\$ 11,039
114		Total Sales Expense	\$ 238,556	\$ 64,564	\$ 303,120

Southwestern Public Service Company

Updated SPS Energy Efficiency and
Load Management Costs

Line No.	FERC Acct	Account Description	Native SPS O&M Expense through the Update Period (Jan '20-Dec '20)	Test Year Affiliate O&M Expense (Jan '20-Dec '20)	Total Company Requested O&M
Administrative and General Expenses					
115	920	Administrative and General Salaries	\$ 5,091,651	\$ 28,421,698	\$ 33,513,349
116	921	Office Supplies and Expenses	\$ 2,693,105	\$ 17,788,272	\$ 20,481,377
117	922	Administrative Expenses Transferred-Credit	\$ (19,257,283)	\$ (517,108)	\$ (19,774,391)
118	923	Outside Services Employed	\$ 673,333	\$ 5,677,501	\$ 6,350,834
119	924	Property Insurance	\$ 3,844,844	\$ 2,760	\$ 3,847,604
120	925	Injuries and Damages	\$ 5,309,125	\$ 2,366,746	\$ 7,675,871
121	926.01	Employee Pensions and Benefits	\$ 17,110,144	\$ 9,508,106	\$ 26,618,250
122	926.03	Deferred Pension Expense	\$ -	\$ -	\$ -
	928	A&G Regulatory Commission Expense	\$ (4,554)	\$ 4,131	\$ (423)
123	928	Regulatory Commission Expense - TX	\$ 1,418,661	\$ -	\$ 1,418,661
124	928.01	Regulatory Commission Expense - NM	\$ 2,275,741	\$ -	\$ 2,275,741
125	928.02	Regulatory Commission Expense - Wholesale	\$ 1,301,992	\$ -	\$ 1,301,992
126	928.03	Regulatory Commission Expense - Transmission Related	\$ -	\$ -	\$ -
127	928.04	Regulatory Commission Expense - Misc	\$ 155,334	\$ 70	\$ 155,404
128	928.05	Regulatory Commission Expense - Energy Related	\$ -	\$ -	\$ -
129	929.00	Duplicate Charges-Credit	\$ (1,137,629)	\$ -	\$ (1,137,629)
130	930.11	General Advertising Expenses	\$ -	\$ -	\$ -
131	930.20	Misc General Expenses	\$ 54,811	\$ 318,228	\$ 373,040
132	931	Rents	\$ (1,905,859)	\$ 13,827,351	\$ 11,921,492
133	935	Maintenance of General Plant	\$ 75	\$ 23,372	\$ 23,448
134		Recoverable Contributions, Dues, and Donations	\$ 1,232,509	\$ -	\$ 1,232,509
135		Total Administrative and General Expenses	\$ 18,856,001	\$ 77,421,126	\$ 96,277,550
136		Total Operations and Maintenance Expense	\$ 388,265,114	\$ 116,815,119	\$ 499,328,849

Note: All amounts included in this attachment are included in the cost of service study provided as Attachment SNN-RR-U2

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 Formas	Requested Amount (Total Company)	% of Class Charges
1	Marketing	200092 - Corporate Strategy & Business Development	Assets/Revenue/No. of Employees	\$ 680,338.46	\$ 580,295.09	\$ 100,043.37	\$ (138.65)	\$ 99,904.72	\$ 2,595.30	\$ 102,500.02	10.91%
2	Marketing	200176 - Marketing & Sales	Revenue	5,443,409.14	4,643,882.29	799,526.85	(901.59)	798,625.26	(1,915.90)	796,709.36	84.81%
3	Marketing	Direct	Direct	3,512,280.17	3,469,167.70	43,112.47	(3,327.07)	39,785.40	371.22	40,156.62	4.27%
4	Marketing Total			\$ 9,636,027.77	\$ 8,693,345.08	\$ 942,682.69	\$ (4,367.31)	\$ 938,315.38	\$ 1,050.63	\$ 939,366.01	100.00%
5	Total Witness Shawn M. White			\$ 9,636,027.77	\$ 8,693,345.08	\$ 942,682.69	\$ (4,367.31)	\$ 938,315.38	\$ 1,050.63	\$ 939,366.01	
	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

Shawn M. White

Docket No. 51802

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

SMW-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	Marketing	417.1 - Expenses of nonutility operations	Below the Line	\$ (3,327.07)
2	Marketing	426.1 - Donations	Below the Line	(331.81)
3	Marketing	426.5 - Other Deductions	Below the Line	(708.43)
4	Marketing Total			<u>\$ (4,367.31)</u>
5	Total Witness Shawn M. White			<u><u>\$ (4,367.31)</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	Marketing	908 - Customer assistance expenses	3% Wage Adjustment	Stephanie N. Niemi/Michael P. Deselich	\$ 160.17
2	Marketing	912 - Sales Demo & Sales	3% Wage Adjustment	Stephanie N. Niemi/Michael P. Deselich	211.05
3	Marketing	912 - Sales Demo & Sales	Business Area Adjustment	Shawn M. White	(9,701.75)
4	Marketing	920 - Administrative and general salaries	3% Wage Adjustment	Stephanie N. Niemi/Michael P. Deselich	11,583.87
5	Marketing	921 - Office supplies and expenses	Business Area Adjustment	Shawn M. White	(1,143.51)
6	Marketing	930.1 - General advertising expenses	Advertising	Stephanie N. Niemi	(59.20)
7	Marketing Total				\$ 1,050.63
8	Total Witness Shawn M. White				\$ 1,050.63
	Amounts may not add or tie to other schedules due to rounding				