

**DOCKET NO. 51802**

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

**UPDATE TESTIMONY  
of  
RICHARD R. SCHRUBBE**

*on behalf of*

**SOUTHWESTERN PUBLIC SERVICE COMPANY**

*(Filename: SchrubbeRRUpdate.doc; Total Pages: 26)*

**Table of Contents**

GLOSSARY OF ACRONYMS AND DEFINED TERMS.....	2
I. WITNESS IDENTIFICATION .....	3
II. ASSIGNMENT FOR UPDATE TESTIMONY .....	4
III. UPDATES TO PENSION AND BENEFIT EXPENSE AMOUNTS.....	7
A. QUALIFIED PENSION EXPENSE .....	7
B. RETIREE MEDICAL EXPENSE.....	8
C. SELF-INSURED LONG-TERM DISABILITY .....	8
D. ACTIVE HEALTH CARE .....	9
E. THIRD-PARTY-INSURED LONG-TERM DISABILITY .....	9
F. LIFE INSURANCE .....	10
G. MISCELLANEOUS HEALTH-CARE-RELATED BENEFITS.....	10
H. MISCELLANEOUS RETIREMENT COSTS .....	11
I. 401(K) MATCH.....	11
J. THIRD-PARTY-INSURED WORKERS' COMPENSATION .....	12
IV. UPDATE TO DEFERRAL AND TRACKER BALANCES .....	13
V. UPDATE TO PREPAID PENSION ASSET BALANCE.....	14
AFFIDAVIT .....	15
CERTIFICATE OF SERVICE .....	16
TESTIMONY ATTACHMENTS:	
Attachment RRS-RR-U1 (filename: RRS-RR-U1.xlsx).....	17
Attachment RRS-RR-U4 (filename: RRS-RR-U4.xlsx).....	19
Attachment RRS-RR-U5 (filename: RRS-RR-U5.xlsx).....	21
Attachment RRS-RR-U6 (filename: RRS-RR-U6.xlsx).....	22
Attachment RRS-RR-U7 (filename: RRS-RR-U7.xlsx).....	23

## **GLOSSARY OF ACRONYMS AND DEFINED TERMS**

<b><u>Acronym/Defined Term</u></b>	<b><u>Meaning</u></b>
Commission	Public Utility Commission of Texas
FAS	Statement of Financial Accounting Standard
OPEB	Other Post-Employment Benefit
PURA	Public Utility Regulatory Act
SPS	Southwestern Public Service Company, a New Mexico corporation
Test Year	October 1, 2019 through September 30, 2020
Total Company	Total SPS (before 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.

**UPDATE TESTIMONY  
OF  
RICHARD R. SCHRUBBE**

**I. WITNESS IDENTIFICATION**

1

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

3   A.     My name is Richard R. Schrubbe. My business address is 401 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 Area Vice-President.

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

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

10  **Q.     Are you the same Richard R. Schrubbe who filed direct testimony on behalf**  
11           **of SPS in this docket?**

12  A.     Yes.

1                                    **II.    ASSIGNMENT FOR UPDATE TESTIMONY**

2    **Q.    What is the purpose of your update testimony?**

3    A.    The purpose of my update testimony is to explain the adjustments that SPS is  
4           making in accordance with Section 36.112(b)(2) of the Public Utility Regulatory  
5           Act (“PURA”), which allows a utility to calculate its revenue requirement based on  
6           “information submitted for a test year, updated to include information that reflects  
7           the most current actual or estimated information regarding increases and decreases  
8           in the utility’s cost of service, including expenses, capital investment, cost of  
9           capital, and sales.”<sup>1</sup> In its initial application, SPS provided information for the Test  
10          Year, which was the 12-month period from October 1, 2019 through September 30,  
11          2020.

12                    The purpose of my update testimony is to replace the numbers in my direct  
13          testimony with actual numbers for the Updated Test Year, which is the twelve-  
14          month period from January 1, 2020 through December 31, 2020. The Updated Test  
15          Year includes the three-month period from October 1, 2020 through December 31,  
16          2020, which I refer to as the “Update Period.” Specifically, I describe updated  
17          amounts for:

- 18                    (a)    qualified pension expense calculated under Statement of Financial  
19                    Accounting Standard (“FAS”) 87;  
20                    (b)    retiree medical expense calculated under FAS 106;  
21                    (c)    self-insured long-term disability expense calculated under FAS 112;<sup>2</sup>

---

<sup>1</sup> PURA is codified in Title II of the Texas Utilities Code. See Tex. Util. Code §§ 11.001-66.016.

<sup>2</sup> The amounts requested in my direct testimony for qualified pension expense, retiree medical expense, and self-insured long-term disability expense are not changing, but the per book amounts have changed. I discuss those changes to the per book amounts in this Update Testimony.

- 1 (d) active health care expense;
- 2 (e) third-party insured long-term disability expense;
- 3 (f) life insurance benefit expense;
- 4 (g) miscellaneous health-care-related benefit expense;
- 5 (h) miscellaneous retirement costs;
- 6 (i) 401(k) match expense; and
- 7 (j) third-party insured workers' compensation benefit expense.

8 I also update the pension and Other Post-Employment Benefit ("OPEB") balances,  
9 and I update the prepaid pension asset balance, which has decreased slightly since  
10 the filing of my direct testimony. Finally, I update the following Rate Filing  
11 Package schedules, and I incorporate them into my update testimony:

- 12 • Schedule B-2, and
- 13 • Schedules G-2.0, 2.1, 2.2, and 2.3.

14 **Q. Please summarize your testimony and recommendations.**

15 A. I recommend that the Public Utility Commission of Texas ("Commission")  
16 authorize SPS to recover \$27,370,480 (total company) in pension and benefits,  
17 which includes actual amounts and known and measurable adjustments through the  
18 end of the Update Period. Table RRS-RR-U1 (next page) summarizes the updated  
19 total company amounts of the pension and benefit costs that SPS seeks to recover  
20 in rates.

Table RRS-RR-U1

<b>A</b>	<b>B</b>	<b>C</b>	<b>D</b>
<b>Benefit</b>	<b>Updated Test Year (12 months ended December 31, 2020)</b>	<b>Known and Measurable Adjustment</b>	<b>Amount Included in Updated Testimony Cost of Service</b>
Qualified Pension	\$8,447,257	\$8,414	\$8,455,671
FAS 106 Retiree Medical	(19,883)	(929)	(20,812)
FAS 112 Long-Term Disability (Self-Insured)	54,190	82	54,272
Active Health Care	13,608,267	53,117	13,661,384
Long-Term Disability (Third-Party-Insured)	548,584	1,388	549,972
Life Insurance	100,940	41	100,981
Miscellaneous Health-Care-Related Benefit Programs and Costs	438,930	10,850	449,780
401(k) Match	3,147,357	16,053	3,163,410
Miscellaneous Retirement-Related Costs	182,934	(15,902)	167,032
Workers Compensation (Third-Party-Insured)	788,790	-	788,790
<b>Total Pension and Benefits Expense</b>	<b>\$27,297,366</b>	<b>\$73,114</b>	<b>\$27,370,480</b>

2 In addition, I recommend that the Commission approve the updated pension and  
3 OPEB deferral and tracker balances that I quantify in this update testimony.  
4 Finally, I recommend that the Commission allow SPS to include in rate base a  
5 prepaid pension asset balance of \$155,651,455 (total company). SPS has reduced  
6 that balance by \$89,913 to reflect asset transfers between pension trusts.

1           **III.   UPDATES TO PENSION AND BENEFIT EXPENSE AMOUNTS**

2   **Q.    Have the pension and benefit expense amounts changed between the time you**  
3           **filed your direct testimony and the filing of your update testimony?**

4   A.    Some of them did. The changes are due primarily to differences between the  
5           forecasted amounts for December 2020 and the actual amounts for that month. In  
6           the following subsections, I describe the adjustment for each category of expense.  
7           In addition, the per book amounts for some types of expenses have changed.

8   **A.    Qualified Pension Expense**

9   **Q.    Is SPS seeking to update the amount of qualified pension expense that is**  
10           **included in the cost of service?**

11   A.    No. As I explained in my direct testimony, SPS is basing its requested amount of  
12           qualified pension expense on the February 2020 calculation by SPS's actuary,  
13           Willis Towers Watson.<sup>3</sup> Because that calculation had been performed before SPS  
14           filed its direct testimony, it is not necessary to update the amount requested, which  
15           is \$8,455,671 on a total company basis.

16   **Q.    Is SPS providing any updates related to qualified pension expense?**

17   A.    Yes. SPS is updating the per book amount of qualified pension expense, which was  
18           \$8,447,257 (total company) for the Updated Test Year. To get from that amount to  
19           the requested amount of \$8,455,671 (total company), it is necessary to make a  
20           known and measurable adjustment of \$8,414 (total company) to the updated per  
21           book amount.

---

<sup>3</sup> See Attachment RRS-RR-3 to my direct testimony.

1    **B.    Retiree Medical Expense**

2    **Q.    Is SPS seeking to update the amount of retiree medical expense that is included**  
3        **in the cost of service?**

4    A.    No. Similar to the qualified pension expense, SPS is basing its requested amount  
5        of retiree medical expense on the February 2020 calculation by Willis Towers  
6        Watson. The requested amount of retiree medical expense is \$(20,812) on a total  
7        company basis.

8    **Q.    Is SPS providing any updates related to retiree medical expense?**

9    A.    Yes. SPS is updating the per book amount of retiree medical pension expense,  
10       which was \$(19,883) (total company) for the Updated Test Year. To get from that  
11       amount to the requested amount of \$(20,812) (total company), it is necessary to  
12       make a known and measurable adjustment of \$(929) (total company) to the updated  
13       per book amount.

14   **C.    Self-Insured Long-Term Disability**

15   **Q.    Is SPS seeking to update the amount of self-insured long-term disability**  
16        **expense that is included in the cost of service?**

17   A.    No. Similar to the qualified pension expense, SPS is basing its requested amount  
18       of self-insured long-term disability expense on the February 2020 calculation by  
19       Willis Towers Watson. The requested amount of self-insured long-term disability  
20       expense is \$54,272 on a total company basis.

21   **Q.    Is SPS providing any updates related to self-insured long-term disability**  
22        **expense?**

23   A.    Yes. SPS is updating the per book amount of self-insured long-term disability  
24       expense, which was \$54,190 (total company) for the Updated Test Year. To get



1 from that amount to the requested amount of \$54,272 (total company), it is  
2 necessary to make a known and measurable adjustment of \$82 (total company) to  
3 the updated per book amount.

4 **D. Active Health Care**

5 **Q. What amount of active health care expense did SPS include in its direct**  
6 **testimony cost of service?**

7 A. The amount of active health care expense that SPS included in its direct testimony  
8 cost of service was \$13,608,267 (total company).

9 **Q. Is SPS changing that amount to reflect any known and measurable changes**  
10 **during the Update Period?**

11 A. Yes. SPS is changing the per book amount to reflect the actual amount of active  
12 health care expense incurred during the Updated Test Year, which was \$13,661,384  
13 (total company), an increase of \$53,117.

14 **E. Third-Party-Insured Long-Term Disability**

15 **Q. What amount of third-party-insured long-term disability expense did SPS**  
16 **include in its direct testimony cost of service?**

17 A. The amount of third-party-insured long-term disability expense that SPS included  
18 in its direct testimony cost of service was \$548,584 (total company).

19 **Q. Is SPS changing that amount to reflect the actual amounts for the Updated**  
20 **Test Year?**

21 A. Yes. The actual amount of third-party-insured long-term disability expense that  
22 SPS incurred during the Updated Test Year was \$549,972 (total company), an  
23 increase of \$1,388. That amount is included in SPS's updated cost of service.

1   **F.    Life Insurance**

2   **Q.    What amount of life insurance expense did SPS include in its direct testimony**  
3       **cost of service?**

4   A.    The amount of life insurance expense that SPS included in its direct testimony cost  
5       of service was \$100,940 (total company).

6   **Q.    Is SPS changing that amount to reflect the actual amounts for the Updated**  
7       **Test Year?**

8   A.    Yes. The actual amount of life insurance expense that SPS incurred during the  
9       Updated Test Year was \$100,981 (total company), an increase of \$41. That amount  
10      is included in SPS's updated cost of service.

11   **G.    Miscellaneous Health-Care-Related Benefits**

12   **Q.    What amount of miscellaneous health-care-related benefits expense did SPS**  
13       **include in its direct testimony cost of service?**

14   A.    The amount of miscellaneous health-care-related benefits expense that SPS  
15       included in its direct testimony cost of service was \$438,930 (total company).

16   **Q.    Is SPS changing that amount to reflect the actual amounts incurred during the**  
17       **Updated Test Year?**

18   A.    Yes. The actual amount of miscellaneous health-care-related benefits that SPS  
19       incurred during the Updated Test Year was \$449,780 (total company), an increase  
20      of \$10,850. That amount is included in SPS's updated cost of service.

1   **H.   Miscellaneous Retirement Costs**

2   **Q.   What amount of miscellaneous retirement expense did SPS include in its direct**  
3       **testimony cost of service?**

4   A.   The amount of miscellaneous retirement expense that SPS included in its direct  
5       testimony cost of service was \$182,934 (total company).

6   **Q.   Is SPS changing that amount to reflect the actual miscellaneous retirement**  
7       **costs incurred during the Updated Test Year?**

8   A.   Yes. The actual amount of miscellaneous retirement costs that SPS incurred during  
9       the Updated Test Year was \$167,032 (total company), a decrease of \$15,902. That  
10      amount is included in SPS's updated cost of service.

11   **I.   401(k) Match**

12   **Q.   What amount of 401(k) matching expense did SPS include in its direct**  
13      **testimony cost of service?**

14   A.   SPS included \$3,147,357 (total company) of 401(k) matching expense in its direct  
15      testimony cost of service.

16   **Q.   Is SPS changing that amount to reflect any known and measurable changes**  
17      **during the Update Period?**

18   A.   Yes. SPS is requesting a known and measurable adjustment of \$16,053 (total  
19      company) for 401(k) matching expense. That amount is necessary to match the  
20      additional compensation amounts incurred during the Update Period. Adding the  
21      known and measurable amount to the \$3,147,357 requested in my direct testimony  
22      produces an Updated Test Year amount of \$3,163,410 (total company). That  
23      amount is included in the updated cost of service.

1   **J.    Third-Party-Insured Workers' Compensation**

2   **Q.    What amount of third-party-insured workers' compensation expense did SPS**  
3       **include in its direct testimony cost of service?**

4   A.    The amount of third-party-insured workers' compensation expense that SPS  
5       included in its direct testimony cost of service was \$788,790 (total company).

6   **Q.    Is SPS changing that amount to reflect the actual third-party-insured workers'**  
7       **compensation expense incurred during the Updated Test Year?**

8   A.    No.

1           **IV.     UPDATE TO DEFERRAL AND TRACKER BALANCES**

2   **Q.     What pension and OPEB deferral balance did SPS include in the cost of service**  
3       **in its direct case?**

4   A.     The pension and OPEB balance included in the cost of service in SPS's direct case  
5       was \$407,369 (Texas retail), which was the balance as of September 30, 2020.

6   **Q.     Did that balance change between the time of the initial filing and the update**  
7       **filing?**

8   A.     Yes. The updated pension and OPEB deferral balance as of December 31, 2020  
9       was \$760,684 (Texas retail). That reflects three additional months of deferred  
10      amounts, plus a true-up of actual year-to-date operation and maintenance  
11      percentages through November 2020.

12   **Q.     Did the baselines for the pension and OPEB tracker change between the initial**  
13      **filing and the update filing?**

14   A.     Yes. The updated pension and OPEB baseline proposed in SPS's update filing is  
15      \$8,455,671 for qualified pension and \$(20,812) for OPEB (both total company).  
16      These amounts reflect the final calendar year 2020 expense, and they are consistent  
17      with the amounts shown in Table RRS-RR-U1 above.

1                   **V. UPDATE TO PREPAID PENSION ASSET BALANCE**

2   **Q.     What was the balance of the prepaid pension asset that SPS included in its**  
3           **direct case?**

4   A.     The prepaid pension asset included in the cost of service in SPS's direct case was  
5           \$155,741,368 (total company).

6   **Q.     Is SPS changing the amount of the prepaid pension asset in this update filing?**

7   A.     Yes. The updated prepaid pension asset amount is \$155,651,455 (total company),  
8           a reduction of \$89,913.

9   **Q.     Why did the prepaid pension asset balance decrease between the filing of your**  
10          **direct testimony and the filing of your update testimony?**

11   A.     The decrease was caused by asset transfers between pension trusts, which was  
12          necessary because of the movement of non-bargaining employees between SPS and  
13          XES.

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

15   A.     Yes.

**AFFIDAVIT**

STATE OF MINNESOTA                    )

)

COUNTY OF ANOKA                    )

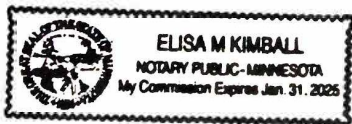
RICHARD R. SCHRUBBE, first being sworn on his oath, states:

I am the witness identified in the preceding testimony. I have read the testimony and the accompanying attachments and am familiar with their 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 testimony are true, valid, and accurate.



RICHARD R. SCHRUBBE

Subscribed and sworn to before me this 19th day of March 2021 by RICHARD R. SCHRUBBE.

  
Notary Public, State of Minnesota

My Commission Expires: 01/31/2025

### **CERTIFICATE OF SERVICE**

I certify that on the 25<sup>th</sup> 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**

**Calculation of Deferred Pension  
and OPEB Balances  
FERC Account 926.03**

Deferrals from 4/1/2019 - 12/31/2020			
	Current Year	Prior Year	
	Deferrals	Deferral True-ups	Total
Apr 2019	152,757		152,757
May 2019	152,757		152,757
Jun 2019	152,757		152,757
Jul 2019	152,757		152,757
Aug 2019	152,757		152,757
Sept 2019	163,750		163,750
Oct 2019	251,695		251,695
Nov 2019	163,750		163,750
Dec 2019	(645,721)		(645,721)
Jan 2020	184,246		184,246
Feb 2020	184,246		184,246
Mar 2020	184,246		184,246
Apr 2020	184,246		184,246
May 2020	184,246		184,246
Jun 2020	184,246	(26,481)	157,766
Jul 2020	184,246	84,148	268,394
Aug 2020	184,246		184,246
Sept 2020	59,786	(1,881,313)	(1,821,527)
Oct 2020	59,786		59,786
Nov 2020	59,786		59,786
Dec 2020	233,744		233,744
	2,584,330	(1,823,646)	760,684

**A** Deferral

**Southwestern Public Service Company****Calculation of Deferred Pension  
and OPEB Balances  
FERC Account 926.03**

	Amortization
<b>Amount to be amortized</b>	<b><u>1,574,975</u></b>
Apr 2019	27,679.83
May 2019	27,679.83
Jun 2019	27,679.83
Jul 2019	27,679.83
Aug 2019	27,679.83
Sept 2019	27,679.83
Oct 2019	27,679.83
Nov 2019	27,679.83
Dec 2019	27,679.83
Jan 2020	27,679.83
Feb 2020	-
Mar 2020	-
Apr 2020	-
May 2020	-
Jun 2020	-
Jul 2020	-
Aug 2020	-
Sept 2020	(1,851,773.00) $\Sigma =$
Oct 2020	-
Nov 2020	-
Dec 2020	-
Unamortized Amount as of 12/31/20	<b><u>0</u> B</b>
Total Net Pension and OPEB Deferrals Balance as of December 31, 2020	<b><u>760,684</u> = A + B</b>

**Notes:**

\* Per Docket No. 49831 the pension and OPEB tracker balance was set at \$1,574,975 as of March 31, 2019. This is the balance that will be amortized over a 12-month period starting April 1, 2019. If the entire amount has not been amortized at the time the rates set in SPS's next base rate go into effect, the Docket No. 47527 Stipulation [Section 2(E)(i)] provides that the remaining unamortized amount can be included in a subsequent base rate case and is deemed reasonable and necessary.

Unamortized Balance - March 31, 2019	\$ 1,574,975
12 Months of Amortization (Feb-Mar)	<u>(1,574,975)</u>
Unamortized Balance - December 31, 2020	<u>-</u>

**Notes:**

\* Per Docket No. 45524 the pension and OPEB tracker balance was set at \$1,841,525

\*\* This entry is an out of period adjustment in order to properly reflect booking 12

Unamortized Balance - May 31, 2017	\$ -
12 Months of Amortization (July-June)	<u>-</u>
Unamortized Balance - June 30, 2017	<u>-</u>

Southwestern Public Service Company

Calculation of Actuarially Determined Pension and Benefit Amounts

	QUALIFIED PENSION		OPEB RETIREE MEDICAL	
	2019	2020	2019	2020
<b>Total Cost Amounts from Actuarial Reports</b>				
SPS-NCE	3,604,000	3,093,000		
SPS-Barg	7,908,000	8,052,000		
SPS Total	11,512,000	11,145,000	(305,000)	(264,000)
Xcel Service	21,759,000	20,625,000	1,253,000	1,197,000
	(1)	(4)	(2)	(5)
<b>Calculation of Total Cost Amounts to Cost of Service Amounts</b>				
	QUALIFIED PENSION		OPEB RETIREE MEDICAL	
	Test Year 12 Months Ending 9/30/20	Known & Measurable Incr/(Decr) from Test Year	Test Year 12 Months Ending 9/30/20	Known & Measurable Incr/(Decr) from Test Year
<b>SPS</b>				
SPS-NCE Total Cost	3,220,750	3,093,000		
SPS-Barg Total Cost	8,016,000	8,052,000		
Total SPS	11,236,750	11,145,000	(274,250)	(264,000)
Percent to SPS O&M FERC 926	57.76%	56.16%	57.76%	56.16%
Amount to SPS O&M FERC 926	6,490,160	6,259,443	(158,402)	(148,272)
<b>Xcel Service</b>				
Xcel Service Total Cost	20,908,500	20,625,000	1,211,000	1,197,000
Percent to SPS O&M FERC 926	10.76%	10.65%	10.76%	10.65%
Amount to SPS O&M FERC 926	2,249,194	2,196,219	130,271	127,461
<b>Affiliate Charges</b>	8	9	-	-
<b>Total</b>	<b>8,739,363</b>	<b>8,455,671</b>	<b>(28,131)</b>	<b>(20,812)</b>
<b>Amount to SPS O&amp;M</b>		<b>(283,692)</b>		<b>7,320</b>

- 1) Attachment RRS-2, Exhibit I Page 1 of 6
- 2) Attachment RRS-2, Exhibit III Page 1 of 6
- 4) Attachment RRS-3, Exhibit I Page 1 of 6
- 5) Attachment RRS-3, Exhibit III Page 1 of 6

Southwestern Public Service Company

Calculation of Actuarially Determined Pension and Benefit Amounts

Total Cost Amounts from Actuarial Reports

FAS 112 LONG-TERM DISABILITY AND WORKERS COMPENSATION		
	2019	2020
SPS	(76,000)	79,000
Xcel Service	3,000	93,000
	(3)	(6)

Calculation of Total Cost Amounts to Cost of Service Amounts

FAS 112 LONG-TERM DISABILITY AND WORKERS  
COMPENSATION

	Test Year 12 Months Ending 9/30/20	2020 Cost	Known & Measurable Incr/(Decr) from Test Year
<b>SPS</b>			
SPS Total Cost	40,250	79,000	38,750
Percent to SPS O&M FERC 926	57.76%	56.16%	
Amount to SPS O&M FERC 926	23,248	44,369	21,122
<b>Xcel Service</b>			
Xcel Service Total Cost	70,500	93,000	22,500
Percent to SPS O&M FERC 926	10.76%	10.65%	
Amount to SPS O&M FERC 926	7,584	9,903	2,319
<b>Affiliate Charges</b>	-	-	-
<b>Total</b>	<b>30,832</b>	<b>54,272</b>	<b>23,441</b>

Amount to SPS O&M

- 3) Attachment RRS-2, Exhibit VI  
6) Attachment RRS-3, Exhibit VI

Southwestern Public Service Company

Calculation of Health and Welfare Costs and the Active Health Care Known and Measurable Adjustment

Calculation of Total Cost Amounts to Cost of Service Amounts

	ACTIVE HEALTH CARE				MISC BENEFIT PROGRAMS AND LIFE INSURANCE				TOTAL HEALTH AND WELFARE			
	Test Year 12 Months Ending 9/30/20	Amount Included in Cost of Service	Incr/(Decr) from Base Period Adjusted	Known & Measurable	Test Year 12 Months Ending 9/30/20	Amount Included in Cost of Service	Incr/(Decr) from Base Period Adjusted	Known & Measurable	Test Year 12 Months Ending 9/30/20	Amount Included in Cost of Service	Incr/(Decr) from Test Year Adjusted	Known & Measurable
<b>SPS</b>												
Total Cost Per Book Amount	15,566,151	16,324,030			823,419	888,982			16,389,570	17,213,012		
Percent to SPS O&M FERC 926	57.75%	56.41%			57.76%	56.14%			57.76%	56.40%		
Amount to SPS O&M FERC 926	8,989,537	9,209,172	219,635		475,593	499,044	23,451		9,465,130	9,708,216	243,085	
<b>Xcel Service</b>												
Total Cost on Incurred Basis	38,104,762	41,949,779			5,946,119	5,653,178			44,050,881	47,602,957		
Percent to SPS O&M FERC 926	10.80%	10.61%			10.76%	10.64%			10.76%	10.62%		
Amount to SPS O&M FERC 926	4,114,066	4,452,200	338,134		639,643	601,688	(37,955)		4,753,709	5,053,888	300,179	
<b>Affiliate/Other Charges</b>	11	12	1		1	1	-		12	13	1	
<b>Total</b>												
Amount to SPS O&M FERC 926	13,103,614	13,661,384	557,770		1,115,237	1,100,733	(14,504)		14,218,851	14,762,117	543,266	

## Southwestern Public Service Company

## Average Balances - Qualified Pension

Prepaid Pension Asset - Qualified		SAP Object Account		Account Description		Dec		Jan		Feb		Mar		Apr	
FERC Account	JDE Object Account					LTD (2019)	LTD (2020)	LTD (2020)	LTD (2020)	LTD (2020)	LTD (2020)	LTD (2020)	LTD (2020)	LTD (2020)	LTD (2020)
228.3	431110.1000	2421006		Accrd Qual Pen Post 15		\$ (60,640,000)	\$ (46,059,167)	\$ (45,906,333)	\$ (45,753,500)	\$ (45,906,333)	\$ (45,753,500)	\$ (45,906,333)	\$ (45,753,500)	\$ (45,906,333)	\$ (45,753,500)
182.3	150201.1700	1151021		FAS 158 Reg Asset Pensi		\$ 11,054,000	\$ (11,054,000)	\$ (11,054,000)	\$ (12,578,750)	\$ (11,054,000)	\$ (12,578,750)	\$ (11,054,000)	\$ (12,578,750)	\$ (11,054,000)	\$ (12,578,750)
182.3	244510.9997	1402006		FAS 158 RA Pension Cont		\$ (11,054,000)	\$ 11,054,000	\$ 11,054,000	\$ 12,578,750	\$ 11,054,000	\$ 12,578,750	\$ 11,054,000	\$ 12,578,750	\$ 11,054,000	\$ 12,578,750
182.3	244510.1700	1402006		FAS 158 Reg Asset Pensi		\$ 208,761,253	\$ 207,543,670	\$ 206,462,086	\$ 205,380,503	\$ 206,462,086	\$ 205,380,503	\$ 206,462,086	\$ 205,380,503	\$ 206,462,086	\$ 205,380,503
Total Prepaid Pension Asset - Qualified						\$ 148,121,253	\$ 161,484,503	\$ 160,555,753	\$ 159,627,003	\$ 160,555,753	\$ 159,627,003	\$ 160,555,753	\$ 159,627,003	\$ 160,555,753	\$ 159,627,003

Prepaid Pension Asset - Qualified		SAP Object Account		Account Description		May		June		Jul		Aug		Sep	
FERC Account	JDE Object Account					LTD (2020)	LTD (2020)	LTD (2020)	LTD (2020)	LTD (2020)	LTD (2020)	LTD (2020)	LTD (2020)	LTD (2020)	LTD (2020)
228.3	431110.1000	2421006		Accrd Qual Pen Post 15		\$ (45,447,833)	\$ (45,295,000)	\$ (45,142,167)	\$ (44,989,333)	\$ (45,142,167)	\$ (44,989,333)	\$ (45,142,167)	\$ (44,989,333)	\$ (45,142,167)	\$ (44,989,333)
182.3	150201.1700	1151021		FAS 158 Reg Asset Pensi		\$ (12,578,750)	\$ (12,178,500)	\$ (12,178,500)	\$ (12,178,500)	\$ (12,178,500)	\$ (12,178,500)	\$ (12,178,500)	\$ (12,178,500)	\$ (12,178,500)	\$ (12,178,500)
182.3	244510.9997	1402006		FAS 158 RA Pension Cont		\$ 12,578,750	\$ 12,178,500	\$ 12,178,500	\$ 12,178,500	\$ 12,178,500	\$ 12,178,500	\$ 12,178,500	\$ 12,178,500	\$ 12,178,500	\$ 12,178,500
182.3	244510.1700	1402006		FAS 158 Reg Asset Pensi		\$ 203,217,336	\$ 202,135,753	\$ 201,054,170	\$ 199,972,586	\$ 201,054,170	\$ 199,972,586	\$ 201,054,170	\$ 199,972,586	\$ 201,054,170	\$ 198,891,003
Total Prepaid Pension Asset - Qualified						\$ 157,769,503	\$ 156,840,753	\$ 155,912,003	\$ 154,983,253	\$ 155,912,003	\$ 154,983,253	\$ 155,912,003	\$ 154,983,253	\$ 155,912,003	\$ 154,054,503

Prepaid Pension Asset - Qualified		SAP Object Account		Account Description		Oct		Nov		Dec		13 Month	
FERC Account	JDE Object Account					LTD (2020)	LTD (2020)	LTD (2020)	LTD (2020)	LTD (2020)	LTD (2020)	Average	Average
228.3	431110.1000	2421006		Accrd Qual Pen Post 15		\$ (44,683,667)	\$ (44,530,833)	\$ (44,530,833)	\$ (35,038,000)	\$ (44,683,667)	\$ (35,038,000)	\$ (44,683,667)	\$ (35,038,000)
182.3	150201.1700	1151021		FAS 158 Reg Asset Pensi		\$ (11,778,250)	\$ (11,778,250)	\$ (11,778,250)	\$ (11,378,000)	\$ (11,778,250)	\$ (11,378,000)	\$ (11,778,250)	\$ (11,378,000)
182.3	244510.9997	1402006		FAS 158 RA Pension Cont		\$ 11,778,250	\$ 11,778,250	\$ 11,778,250	\$ 11,378,000	\$ 11,778,250	\$ 11,378,000	\$ 11,778,250	\$ 11,378,000
182.3	244510.1700	1402006		FAS 158 Reg Asset Pensi		\$ 197,809,420	\$ 196,727,836	\$ 196,727,836	\$ 185,137,253	\$ 197,809,420	\$ 185,137,253	\$ 197,809,420	\$ 185,137,253
Total Prepaid Pension Asset - Qualified						\$ 153,125,753	\$ 152,197,003	\$ 152,197,003	\$ 150,099,253	\$ 153,125,753	\$ 150,099,253	\$ 153,125,753	\$ 150,099,253

Southwestern Public Service Company

Prepaid Qualified Pension Asset

(\$ in Thousands)	Actual Aug. 31 1988	Actual Aug. 31 1989	Actual Aug. 31 1990	Actual Aug. 31 1991	Actual Aug. 31 1992	Actual Aug. 31 1993	Actual Aug. 31 1994	Actual Aug. 31 1995	Actual Aug. 31 1996
Beginning Balance Pension Asset (Liability)	\$ 2,706	\$ 3,724	\$ 3,902	\$ 4,531	\$ (5,955)	\$ (7,207)	\$ (7,347)	\$ (7,039)	\$ (7,045)
Pension (Expense) Credit Accrual	\$ 1,018	\$ (471)	\$ (1,332)	\$ (2,464)	\$ (2,487)	\$ (1,354)	\$ (761)	\$ (1,097)	\$ (855)
Net Employer Contributions	\$ -	\$ 649	\$ 1,961	\$ -	\$ 1,235	\$ 1,214	\$ 1,069	\$ 1,091	\$ 995
Other				\$ (8,022)					
Ending Balance Pension Asset (Liability)	\$ 3,724	\$ 3,902	\$ 4,531	\$ (5,955)	\$ (7,207)	\$ (7,347)	\$ (7,039)	\$ (7,045)	\$ (6,905)

Southwestern Public Service Company

Prepaid Qualified Pension Asset

(\$ in Thousands)	Actual Sep. - Dec. Transition	Actual Dec. 31 1997	Actual Dec. 31 1998	Actual Dec. 31 1999	Actual Dec. 31 2000	Actual Dec. 31 2001	Actual Dec. 31 2002	Actual Dec. 31 2003	Actual Dec. 31 2004
Beginning Balance Pension Asset (Liability)	\$ (6,905)	\$ (6,548)	\$ -	\$ 24,611	\$ 40,087	\$ 61,359	\$ 82,503	\$ 105,044	\$ 121,580
Pension (Expense) Credit Accrual	\$ 9	\$ 12,645	\$ 15,175	\$ 15,476	\$ 21,352	\$ 21,131	\$ 22,235	\$ 16,536	\$ 11,177
Net Employer Contributions	\$ 348	\$ (6,097)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Other			\$ 9,436		\$ (80)	\$ 14	\$ 306		
Ending Balance Pension Asset (Liability)	\$ (6,548)	\$ -	\$ 24,611	\$ 40,087	\$ 61,359	\$ 82,503	\$ 105,044	\$ 121,580	\$ 132,757



Southwestern Public Service Company

Prepaid Qualified Pension Asset

(\$ in Thousands)	Actual Dec. 31 2005	Actual Dec. 31 2006	Actual Dec. 31 2007	Actual Dec. 31 2008	Actual Dec. 31 2009	Actual Dec. 31 2010	Actual Dec. 31 2011	Actual Dec. 31 2012	Actual Dec. 31 2013
Beginning Balance Pension Asset (Liability)	\$ 132,757	\$ 143,309	\$ 150,827	\$ 158,778	\$ 169,516	\$ 184,514	\$ 178,721	\$ 171,936	\$ 167,329
Pension (Expense) Credit Accrual	\$ 9,102	\$ 6,934	\$ 7,951	\$ 10,738	\$ 6,644	\$ (5,793)	\$ (11,961)	\$ (17,624)	\$ (21,571)
Net Employer Contributions	\$ 1,450	\$ 584	\$ -	\$ -	\$ 8,354	\$ -	\$ 5,176	\$ 13,060	\$ 22,015
Other								\$ (44)	
Ending Balance Pension Asset (Liability)	\$ 143,309	\$ 150,827	\$ 158,778	\$ 169,516	\$ 184,514	\$ 178,721	\$ 171,936	\$ 167,329	\$ 167,773

Southwestern Public Service Company

Prepaid Qualified Pension Asset

(\$ in Thousands)	Actual Dec. 31 2014	Actual Dec. 31 2015	Actual Dec. 31 2016	Actual Dec. 31 2017	Actual Dec. 31 2018	Actual Dec. 31 2019	Actual Dec. 31 2020
Beginning Balance Pension Asset (Liability)	\$ 167,773	153,681	147,626	144,174	153,002	144,091	148,121
Pension (Expense) Credit Accrual	\$ (16,829)	(17,706)	(15,404)	(14,566)	(13,732)	(11,512)	(11,145)
Net Employer Contributions	\$ 4,869	11,651	18,088	23,503	8,033	17,916	14,428
Other	\$ (2,132)		(6,135)	(109)	(3,212)	(2,374)	(1,305)
Ending Balance Pension Asset (Liability)	\$ 153,681	\$ 147,626	\$ 144,174	\$ 153,002	\$ 144,091	\$ 148,121	\$ 150,099