

BEFORE THE NEW MEXICO PUBLIC REGULATION COMMISSION

**IN THE MATTER OF SOUTHWESTERN)
PUBLIC SERVICE COMPANY'S)
ANNUAL 2022 RENEWABLE ENERGY)
PORTFOLIO PROCUREMENT PLAN)
AND REQUESTED APPROVALS)
THEREIN; PROPOSED 2022)
RENEWABLE PORTFOLIO STANDARD)
COST AND RECONCILIATION)
RIDERS; APPLICATION FOR AN RPS)
INCENTIVE; AND OTHER)
ASSOCIATED RELIEF,)
)
)
)
)
)
SOUTHWESTERN PUBLIC SERVICE)
COMPANY,)
)**

CASE NO. 21-00__-UT

APPLICANT.

DIRECT TESTIMONY

of

RICHARD M. LUTH

on behalf of

SOUTHWESTERN PUBLIC SERVICE COMPANY

July 1, 2021

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GLOSSARY OF ACRONYMS AND DEFINED TERMS

<u>Acronym/Defined Term</u>	<u>Meaning</u>
Commission	New Mexico Public Regulation Commission
ETA	Energy Transition Act
kV	kilovolt
kW	kilowatt
kWh	kilowatt-hour
LCC	Large Customer Cap
RPS	Renewable Portfolio Standard
SPS	Southwestern Public Service Company, a New Mexico corporation

LIST OF ATTACHMENTS

<u>Attachment</u>	<u>Description</u>
RML-1	Proposed 2022 RPS Cost Rider Tariff
RML-2	Calculation of 2022 RPS Cost Rider
RML-3	Proposed 2022 RPS Reconciliation Rider Tariff
RML-4	Calculation of 2022 RPS Reconciliation Rider
RML-5	Proposed 2022 Renewable Performance Rider
RML-6	Calculation of the 2022 Renewable Performance Rider
RML-7	Bill Impacts

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Direct Testimony
of
Richard M. Luth

1 **I. WITNESS IDENTIFICATION AND QUALIFICATIONS**

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

3 A. My name is Richard M. Luth. My business address is 790 S. Buchanan Street,
4 Amarillo, Texas 79101.

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

6 A. I am filing testimony on behalf of Southwestern Public Service Company, a New
7 Mexico corporation (“SPS”) and wholly-owned electric utility subsidiary of Xcel
8 Energy Inc.

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

10 A. I am employed by SPS as Manager, Pricing and Planning in the Regulatory
11 Administration Department.

12 **Q. Please briefly outline your responsibilities as Manager, Pricing and Planning.**

13 A. I am responsible for the preparation of electric cost allocation studies and the
14 development and design of retail electric rates and tariffs for SPS. Those
15 responsibilities include development of rates, terms, and conditions for proposed
16 service contracts, and the analysis of various other regulatory and business issues
17 for SPS.

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1 **Q. Please describe your educational background.**

2 A. I graduated from Illinois State University in 1983, with a Bachelor of Science in
3 Accounting.

4 **Q. Please describe your professional experience.**

5 A. I have been employed by SPS and its affiliated companies since April 2008. Prior
6 to that, I was a Rates Analyst and Economic Analyst with the Illinois Commerce
7 Commission since October 1990. At the Illinois Commerce Commission, I
8 reviewed cost-of-service, rates, and other matters involving the regulation of
9 investor-owned public utilities.

10 **Q. Have you attended or taken any special courses or seminars relating to**
11 **public utilities?**

12 A. Yes. I attended and completed the Edison Electric Institute's Electric Rates
13 Advanced course. In addition, I have attended numerous courses and seminars
14 hosted by the Illinois State University Institute for Regulatory Policy Studies.

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1 **Q. Have you testified or filed testimony before any regulatory authorities?**

2 A. Yes. I have filed testimony on behalf of SPS in numerous cases before the New
3 Mexico Public Regulation Commission (“Commission”) regarding cost
4 allocation, rate design, and tariff issues, including SPS’s last eight base rate cases.
5 I have filed testimony on behalf of SPS in past Renewable Portfolio Standard
6 (“RPS”) cases, including Case No. 20-00143-UT¹ that established the currently-
7 effective RPS Cost Rider and RPS Reconciliation Rider. I have also testified on
8 behalf of SPS in numerous cases before the Public Utility Commission of Texas
9 on similar matters. Finally, before joining SPS, I testified before the Illinois
10 Commerce Commission on numerous occasions on various cost allocation, rate
11 design, and tariff issues.

¹ See Case No. 20-00143-UT, *In the Matter of Southwestern Public Service Company’s Annual 2021 Renewable Energy Portfolio Procurement Plan and Requested Approval Therein; Proposed 2021 Renewable Portfolio Standard Cost and Reconciliation Riders; Application for an RPS Incentive; and Other Associated Relief*, Final Order Adopting Recommended Decision with Modification to Decretal Paragraph K (Dec. 16, 2020).

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1 **II. TESTIMONY – SUMMARY, PURPOSE, AND RECOMMENDATIONS**

2 **Q. What is your assignment in this proceeding?**

3 A. My testimony supports SPS’s calculation of the 2022 RPS Rider rate and the 2022
4 RPS Reconciliation Rider rate. I also propose and support the 2022 Renewable
5 Performance Rider.

6 **Q. Please summarize the conclusions reached in your testimony.**

7 A. In accordance with the Final Order in Case No. 12-00350-UT,² the projected costs
8 for 2022 result in a 2022 RPS Rider of \$0.002305 per kilowatt-hour (“kWh”) for
9 all New Mexico retail customers, other than kWh purchased under a voluntary
10 program for purchasing renewable energy (i.e., Solar*Connect). As a result of the
11 elimination of the large customer cap (“LCC”) under the Energy Transition Act
12 (“ETA”) and as approved in Case No. 19-00134-UT, SPS has calculated an
13 additional rate rider (RPS Reconciliation Rider) to appropriately charge customers
14 in 2022 for the true-up of amounts associated with prior periods when the LCC
15 was in effect. The 2022 RPS Reconciliation Rider charge of \$0.000132 per kWh

² Case No. 12-00350-UT, *In the Matter of Southwestern Public Service Company’s Application for Revision of its Retail Electric Rates Under Advice Notice No. 245*, Final Order Partially Adopting Recommended Decision (Mar. 26, 2014).

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1 will apply to all customers, excluding customers previously considered Large
2 Qualifying Customers. The Renewable Performance Rider, required by Rule
3 17.9.572.15.E NMAC, will collect SPS's proposed incentive for 2022 and is
4 designed to reconcile the following year. The proposed 2022 Renewable
5 Performance Rider is \$0.000200 per kWh.

6 **Q. Were Attachments RML-1 through RML-7 prepared by you or under your**
7 **direct supervision and control?**

8 A. Yes.

III. 2022 RPS RIDER RATE CALCULATION

1 **Q. Please describe how SPS determined the 2022 RPS Rider rate.**

2 A. To determine the 2022 RPS Rider rate, I divided the 2022 RPS Rider revenue
3 requirement that was provided by Mr. Contreras (\$18,984,668;³ Attachment
4 RML-2, line no. 1) by the net of: 1) projected kWh sales for the Plan Year for all
5 New Mexico retail customers, and 2) less projected kWh sales under SPS's
6 voluntary program for purchasing renewable energy (i.e., Solar*Connect)
7 (Attachment RML-2, line nos. 2-4).

8 **Q. What is SPS's proposed 2022 RPS Rider rate and how does it compare to the**
9 **2021 RPS Rider rate?**

10 A. The proposed 2022 RPS Rider rate is \$0.002305 per kWh (Attachment RML-1,
11 and Attachment RML-2, line no. 5) for all New Mexico customer classes other
12 than kWh purchased under a voluntary program for renewable energy. The 2021
13 RPS Rider rate is \$0.002204 per kWh.

³ Direct Testimony of Mario A. Contreras, Attachment MAC-4, Rider RR p1, line no. 14

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1 **Q. Have you provided a draft of the revised RPS Cost Rider?**

2 A. Yes. Attachment RML-1 is a copy of the Ninth Revised Rate No. 70, and is the
3 proposed 2022 RPS Cost Rider. SPS has filed an advice notice and the rate tariffs
4 with its Application.

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1 \$0.000132 per kWh. SPS has filed an advice notice and the rate tariffs with its
2 Application.

3 **Q. What is the bill impact for each customer class, considering both the**
4 **proposed 2022 RPS Rider and the proposed 2022 RPS Reconciliation Rider**
5 **compared to the current 2021 RPS Rider and RPS Reconciliation Rider?**

6 A. Bill impacts for each customer class over the course of the year are shown below.
7 Please refer to Attachment RML-7 for the calculations and other usage levels for
8 each customer class.

- 9 • The total bill to a Residential Service customer taking 750 kWh per month
10 would be \$82.91 under the proposed 2022 RPS and Reconciliation Riders,
11 compared to \$82.11 under the current RPS and Reconciliation Riders (an
12 increase of 0.97% of total bill).
- 13 • A Small General Service customer taking 1,000 kWh per month would be
14 charged \$96.24 over the course of the year under the proposed 2022 RPS
15 and Reconciliation Riders, compared to \$95.18 under the current RPS and
16 Reconciliation Riders (an increase of 1.11% of total bill).
- 17 • A Secondary General Service customer with 15,000 kWh of energy and 35
18 kilowatts (“kW”) of demand a month would be charged \$1,114.61 under
19 the proposed RPS and Reconciliation Riders, compared to \$1,098.62
20 under the current RPS and Reconciliation Riders (an increase of 1.46% of
21 total bill).
- 22 • An Irrigation Service customer with 7,500 kWh of energy and 35 kW of
23 demand a month would be charged \$668.09 under the proposed RPS and
24 Reconciliation Riders, compared to \$660.05 under the current RPS and
25 Reconciliation Riders (an increase of 1.21% of total bill).

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- 1 • A Primary General Service customer with 15,000 kWh of energy and 35
2 kW of demand a month would be charged \$1,023.16 under the proposed
3 RPS and Reconciliation Riders, compared to \$1,007.17 under the current
4 RPS and Reconciliation Riders (an increase of 1.59% of total bill).
- 5 • A Large General Service - Transmission customer taking service at 69
6 kilovolts (“kV”) with 4,000,000 kWh of energy and 6,100 kW of demand
7 a month would be charged \$170,195.43 under the proposed RPS and
8 Reconciliation Riders, compared to \$169,778.84 under the current RPS
9 and Reconciliation Riders (an increase of 0.25% of the total bill).
- 10 • A Large General Service - Transmission 115+ kV customer with
11 4,000,000 kWh of energy and 6,300 kW of demand a month would be
12 charged \$171,397.78 under the proposed RPS and Reconciliation Riders,
13 compared to \$170,981.18 under the current RPS and Reconciliation Riders
14 (an increase of 0.24% of total bill).
- 15 • A Large Municipal and School Service customer with 20,000 kWh of
16 energy and 45 kW of demand a month would be charged \$1,228.18 under
17 the proposed RPS and Reconciliation Riders, compared to \$1,206.86
18 under the current RPS and Reconciliation Riders (an increase of 1.77% of
19 total bill).
- 20 • A Small Municipal and School Service customer at 1,000 kWh of energy
21 per month would be charged \$86.19 under the proposed RPS and
22 Reconciliation Riders, compared to \$85.12 under the current RPS and
23 Reconciliation Riders (an increase of 1.26% of total bill).

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1 **Q. Have you provided a draft of the Renewable Performance Rider?**

2 A. Yes. Attachment RML-5 is a copy of the proposed tariff reflecting the proposed
3 2022 Renewable Performance Rider rate. SPS proposes to file an updated tariff in
4 2022 for plan year 2023, and in 2023 for plan year 2024. A rate of \$0.000200 per
5 kWh will apply for the proposed incentive earned for SPS surpassing RPS
6 requirements.

7 **Q. Does SPS propose to reconcile the Renewable Performance Rider for any**
8 **under- or over- recoveries?**

9 A. Yes, Rule 17.9.572.15.E requires that the Renewable Performance Rider be
10 reconciled in the subsequent year to the incentive being collected. Therefore, SPS
11 will reconcile the 2022 Renewable Performance Rider in its 2023 RPS filing, its
12 2023 Renewable Performance Rider in its 2024 RPS filing, and its 2024
13 Renewable Performance Rider in its 2025 RPS filing.

14 **Q. What will the typical bill impact be of the Renewable Performance Rider for**
15 **each customer class?**

16 A. The typical bill impact for each customer class over the course of the year are
17 shown below. Please refer to Attachment RML-7 for the bill impact calculations
18 at various levels of usage.

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- 1 • The total bill to a Residential customer taking 750 kWh per month would
2 be charged \$0.16 under the proposed Renewable Performance Rider,
3 which is an increase of 0.19%.
- 4 • A Small General Service customer taking 1,000 kWh per month would be
5 charged \$0.20 over the course of the year under the proposed Renewable
6 Performance Rider, which is an increase of 0.21%.
- 7 • A Secondary General Service customer with 15,000 kWh of energy and 35
8 kW of demand a month would be charged \$3.09 under the proposed
9 Renewable Performance Rider, which is an increase of 0.25%.
- 10 • An Irrigation Service customer with 7,500 kWh of energy and 35 kW of
11 demand a month would be charged \$3.09 under the proposed Renewable
12 Performance Rider, which is an increase of 0.25%.
- 13 • A Primary General Service customer with 15,000 kWh of energy and 35
14 kW of demand a month would be charged \$3.09 under the proposed
15 Renewable Performance Rider, which is an increase of 0.31%.
- 16 • A Large General Service - Transmission customer taking service at 69 kV
17 with 4,000,000 kWh of energy and 6,100 kW of demand a month would
18 be charged \$824.93 under the proposed Renewable Performance Rider,
19 which is an increase of 0.49%.
- 20 • A Large General Service - Transmission customer taking service at 115+
21 kV customer with 4,000,000 kWh of energy and 6,300 kW of demand a
22 month would also be charged \$824.94 under the proposed Renewable
23 Performance Rider, which is an increase of 0.48%.
- 24 • A Large Municipal and School Service customer with 20,000 kWh of
25 energy and 45 kW of demand a month would be charged \$4.12 under the
26 proposed Renewable Performance Rider, which is an increase of 0.34%.

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- 1 • A Small Municipal and School Service customer taking 1,000 kWh of
2 energy per month would be charged \$0.21 under the proposed Renewable
3 Performance Rider, which is an increase of 0.25%.

4 **Q. Does this conclude your pre-filed direct testimony?**

5 **A. Yes.**

VERIFICATION

On this day, July 1, 2020, I, Richard M. Luth, swear and affirm under penalty of perjury under the law of the State of New Mexico, that my testimony contained in Direct Testimony of Richard M. Luth is true and correct.

/s/ Richard M. Luth _____
RICHARD M. LUTH

SOUTHWESTERN PUBLIC SERVICE COMPANY

**NINTH REVISED RATE NO. 70
CANCELING EIGHTH REVISED RATE NO. 70**

**X
X**

RPS COST RIDER

APPLICABLE: This rate rider is applicable to bills for electric service provided under all of SPS's retail rate schedules.

TERRITORY: Area served by Company in New Mexico.

RATE: The rate is applied to each kWh used per month to each customer class listed below other than kWh purchased under Rate Rider 33 or Rate Rider 76.

CUSTOMER CLASS:	\$/kWh	
Residential Service, Residential Heating Service, Small General Service, Small Municipal and School Service, Municipal Street Lighting Service, Area Lighting Service	\$0.002305	X
Secondary General Service, Irrigation Power Service, Large Municipal and School Service	\$0.002305	X
Primary General Service	\$0.002305	X
Large General Service – Transmission	\$0.002305	X

Renewable energy costs recovered through this rider are approved for recovery by the Commission. Company will reconcile costs previously approved for recovery through this Rider. Over-recovery of previously approved renewable energy costs will represent a credit to and reduction of approved renewable energy costs recoverable over a future period, and under-recovery of previously approved renewable energy costs will represent a charge in addition to approved renewable energy costs recoverable over a future period.

296	X
Advice Notice No.	
<i>/s/ William A. Grant</i>	
REGIONAL VICE PRSIDENT – RATES & REGULATORY AFFAIRS	

Southwestern Public Service Company
New Mexico
2022 RPS Cost Rider

Line No.		
1	RPS Rider Revenue Requirement (MAC-4, Rider RR, p1, line no. 13)	\$ 18,984,668
	Divided by:	
2	Total kWh New Mexico Retail Forecast	8,241,826,395
3	Less Solar*Connect kWh ¹	<u>(4,706,000)</u>
4	Net 2022 kWh Applicable to RPS Charge	<u>8,237,120,395</u>
5	2022 RPS Charge per kWh (line no. 1 ÷ line no. 4)	<u><u>\$ 0.002305</u></u>

¹ from Bench Request 7 Response in Case No.18-00308-UT.

SOUTHWESTERN PUBLIC SERVICE COMPANY

SECOND REVISED RATE NO. 77
CANCELING FIRST REVISED RATE NO. 77

X
X

RPS RECONCILIATION RIDER

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APPLICABLE: This rate rider is applicable to bills for electric service provided under all of SPS's retail rate schedules, excluding customers previously considered Large Qualifying Customers as defined by Section 62-16-4A(2) of the Renewable Energy Act, or those customers that would meet that definition while this rider is in effect.

TERRITORY: Area served by Company in New Mexico.

RATE: \$0.000132 per kWh in each billing period.

X

Renewable energy costs recovered or credited through this rider are approved for recovery by the New Mexico Public Regulation Commission. Company will reconcile costs previously approved for recovery through this Rider. Over-recovery of previously approved renewable energy costs will represent a credit to and reduction of approved renewable energy costs recoverable over a future period, and under-recovery of previously approved renewable energy costs will represent a charge in addition to approved renewable energy costs recoverable over a future period.

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X

Advice Notice No.

/s/ William A. Grant

REGIONAL VICE PRSIDENT –
RATES & REGULATORY AFFAIRS

Southwestern Public Service Company
New Mexico
2022 RPS Reconciliation Rider

Line No.		\$
1	2020 Excess Credits Charged in 2022 (MAC-4, Rider RR, p1, Line Nos. 4 + 5)	494,899
2	Divided by: Gross Total kWh	8,241,826,395
3	Large Customer kWh	<u>(4,488,697,942)¹</u>
4	Net Total kWh	<u>3,753,128,453</u>
5	Charge per kWh (line no. 1 ÷ line no. 4)	<u>\$ 0.000132</u>

¹ Estimated kWh to customers with kWh of 10 million or more kWh in 2022. Charge for 2020 Excess Credits applies only to customers with less than 10 million kWh in 2022. Large customer cap applied in 2019, with credits applied in May and June of 2021.

SOUTHWESTERN PUBLIC SERVICE COMPANY

ORIGINAL RATE NO. 84

X

RENEWABLE PERFORMANCE RIDER

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APPLICABLE: This rate rider is applicable to bills for electric service provided under all of SPS's retail rate schedules.

TERRITORY: Area served by Company in New Mexico.

RATE: \$0.000200 per kWh in each billing period.

Incentives for surpassing the requirements of the renewable Portfolio standard, under the authority of Chapter 62, Article 16-4 (D) NMSA 1978, and recovered through this rider are approved by the New Mexico Public Regulation Commission. Company will reconcile costs previously approved for recovery through this Rider. Over-recovery of previously approved renewable energy incentives will represent a reduction of approved renewable energy incentives recoverable over a future period, and under-recovery of previously approved renewable energy incentives will represent a charge in addition to approved renewable energy costs incentives recoverable over a future period.

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X

Advice Notice No.

/s/ William A. Grant

REGIONAL VICE PRESIDENT, RATES AND
REGULATORY AFFAIRS

**Southwestern Public Service Company
New Mexico
2022 RPS Performance Rider**

Line No.		
1	RPS Rider Revenue Requirement (Direct Testimony of Mario A. Contreras)	\$ 1,647,424
2	Divided by:	
	Total kWh New Mexico Retail Forecast	8,241,826,395
3	Less Solar*Connect kWh	<u>(4,706,000)¹</u>
4	Net 2022 kWh Applicable to RPS Charge	<u>8,237,120,395</u>
5	2022 RPS Performance Charge per kWh (line no. 1 ÷ line no. 4)	<u>\$ 0.000200</u>
6	Combined RPS Charges per kWh to Customers under 10 million kWh per year	<u>\$ 0.002637</u>
7	Combined RPS Charges per kWh to Customers with 10 million kWh per year or more	<u>\$ 0.002505</u>

¹ from Bench Request 7 Response in Case No.18-00308-UT.

Southwestern Public Service Company
Bill Comparison Summary
Monthly Bills by Rate Class

Description	Monthly Bill at Current RPS		Monthly Bill at Current RPS with Rider Added		Monthly Bill at Proposed RPS and Performance Riders	
	Monthly Current Riders	\$ Change	Monthly Current Riders	\$ Change	Monthly Proposed Riders	% Change
<u>Residential Service (Summer)</u>						
0 kWh	\$ 9.90	\$ -	\$ 9.90	\$ -	\$ 9.90	0.00%
250 kWh	\$ 35.94	\$ 0.05	\$ 35.99	\$ 0.05	\$ 36.26	0.89%
500 kWh	\$ 61.99	\$ 0.10	\$ 62.09	\$ 0.10	\$ 62.62	1.02%
750 kWh	\$ 88.03	\$ 0.15	\$ 88.18	\$ 0.15	\$ 88.98	1.08%
1,000 kWh	\$ 114.07	\$ 0.21	\$ 114.28	\$ 0.21	\$ 115.35	1.12%
2,000 kWh	\$ 218.25	\$ 0.41	\$ 218.66	\$ 0.41	\$ 220.79	1.16%
<u>Residential Service (Non-Summer)</u>						
0 kWh	\$ 9.90	\$ -	\$ 9.90	\$ -	\$ 9.90	0.00%
250 kWh	\$ 32.98	\$ 0.05	\$ 33.03	\$ 0.05	\$ 33.30	0.97%
500 kWh	\$ 56.07	\$ 0.10	\$ 56.17	\$ 0.10	\$ 56.70	1.12%
750 kWh	\$ 79.15	\$ 0.16	\$ 79.31	\$ 0.16	\$ 80.11	1.21%
1,000 kWh	\$ 102.24	\$ 0.20	\$ 102.44	\$ 0.20	\$ 103.51	1.24%
2,000 kWh	\$ 194.57	\$ 0.41	\$ 194.98	\$ 0.41	\$ 197.12	1.31%
<u>Residential Service Annualized</u>						
0 kWh	\$ 9.90	\$ -	\$ 9.90	\$ -	\$ 9.90	0.00%
250 kWh	\$ 33.97	\$ 0.05	\$ 34.02	\$ 0.05	\$ 34.29	0.94%
500 kWh	\$ 58.04	\$ 0.10	\$ 58.14	\$ 0.10	\$ 58.67	1.09%
750 kWh	\$ 82.11	\$ 0.16	\$ 82.27	\$ 0.16	\$ 83.07	1.17%
1,000 kWh	\$ 106.18	\$ 0.21	\$ 106.39	\$ 0.21	\$ 107.46	1.21%
2,000 kWh	\$ 202.46	\$ 0.41	\$ 202.87	\$ 0.41	\$ 205.01	1.26%

Southwestern Public Service Company
Bill Comparison Summary
Monthly Bills by Rate Class

Description	Monthly Bill at Current RPS		Monthly Bill at Proposed RPS and Performance Riders		\$ Change	% Change
	Monthly Bill at Current RPS Riders	Rider Added Performance	Monthly Bill at Proposed RPS Riders	Performance		
<u>Residential Heat Service (Summer)</u>						
0 kWh	\$ 9.90	\$ 9.90	\$ 9.90	\$ 9.90	\$ -	0.00%
250 kWh	\$ 35.94	\$ 35.99	\$ 36.26	\$ 36.26	\$ 0.32	0.89%
500 kWh	\$ 61.99	\$ 62.09	\$ 62.62	\$ 62.62	\$ 0.63	1.02%
750 kWh	\$ 88.03	\$ 88.18	\$ 88.98	\$ 88.98	\$ 0.95	1.08%
1,000 kWh	\$ 114.07	\$ 114.28	\$ 115.35	\$ 115.35	\$ 1.28	1.12%
2,000 kWh	\$ 218.25	\$ 218.66	\$ 220.79	\$ 220.79	\$ 0.32	1.11%
<u>Residential Heat Service (Non-Summer)</u>						
0 kWh	\$ 9.90	\$ 9.90	\$ 9.90	\$ 9.90	\$ -	0.00%
250 kWh	\$ 28.72	\$ 28.78	\$ 29.04	\$ 29.04	\$ 0.32	1.11%
500 kWh	\$ 47.55	\$ 47.65	\$ 48.19	\$ 48.19	\$ 0.64	1.35%
750 kWh	\$ 66.38	\$ 66.53	\$ 67.33	\$ 67.33	\$ 0.95	1.43%
1,000 kWh	\$ 85.20	\$ 85.41	\$ 86.47	\$ 86.47	\$ 1.27	1.49%
2,000 kWh	\$ 160.50	\$ 160.92	\$ 163.05	\$ 163.05	\$ 2.55	1.59%
<u>Residential Heat Service Annualized</u>						
0 kWh	\$ 9.90	\$ 9.90	\$ 9.90	\$ 9.90	\$ -	0.00%
250 kWh	\$ 31.13	\$ 31.18	\$ 31.45	\$ 31.45	\$ 0.32	1.03%
500 kWh	\$ 52.36	\$ 52.46	\$ 53.00	\$ 53.00	\$ 0.64	1.22%
750 kWh	\$ 73.60	\$ 73.75	\$ 74.55	\$ 74.55	\$ 0.95	1.29%
1,000 kWh	\$ 94.82	\$ 95.03	\$ 96.10	\$ 96.10	\$ 1.28	1.35%
2,000 kWh	\$ 179.75	\$ 180.17	\$ 182.30	\$ 182.30	\$ 2.55	1.42%

Southwestern Public Service Company
Bill Comparison Summary
Monthly Bills by Rate Class

Description	Monthly Bill at Current RPS			Monthly Bill at Proposed RPS and Performance Riders		
	Monthly Bill at Current RPS Riders	Rider Added	% Change	Monthly Bill at Proposed RPS Riders	\$ Change	% Change
<u>Small General Service (Summer)</u>						
0 kWh	\$ 15.78	\$ 15.78	0.00%	\$ 15.78	\$ -	0.00%
250 kWh	\$ 37.07	\$ 37.12	0.13%	\$ 37.39	\$ 0.32	0.86%
500 kWh	\$ 58.37	\$ 58.47	0.17%	\$ 59.00	\$ 0.63	1.08%
750 kWh	\$ 79.66	\$ 79.82	0.20%	\$ 80.62	\$ 0.96	1.21%
1,000 kWh	\$ 100.96	\$ 101.17	0.21%	\$ 102.23	\$ 1.27	1.26%
2,000 kWh	\$ 186.14	\$ 186.56	0.42%	\$ 188.69	\$ 2.55	1.37%
<u>Small General Service (Non-Summer)</u>						
0 kWh	\$ 15.78	\$ 15.78	0.00%	\$ 15.78	\$ -	0.00%
250 kWh	\$ 34.90	\$ 34.96	0.17%	\$ 35.22	\$ 0.32	0.92%
500 kWh	\$ 54.03	\$ 54.14	0.20%	\$ 54.67	\$ 0.64	1.18%
750 kWh	\$ 73.16	\$ 73.31	0.21%	\$ 74.11	\$ 0.95	1.30%
1,000 kWh	\$ 92.29	\$ 92.49	0.22%	\$ 93.56	\$ 1.27	1.38%
2,000 kWh	\$ 168.80	\$ 169.21	0.41%	\$ 171.34	\$ 2.54	1.50%
<u>Small General Service Annualized</u>						
0 kWh	\$ 15.78	\$ 15.78	0.00%	\$ 15.78	\$ -	0.00%
250 kWh	\$ 35.62	\$ 35.68	0.17%	\$ 35.94	\$ 0.32	0.90%
500 kWh	\$ 55.48	\$ 55.58	0.18%	\$ 56.11	\$ 0.63	1.14%
750 kWh	\$ 75.33	\$ 75.48	0.20%	\$ 76.28	\$ 0.95	1.26%
1,000 kWh	\$ 95.18	\$ 95.38	0.21%	\$ 96.45	\$ 1.27	1.33%
2,000 kWh	\$ 174.58	\$ 174.99	0.41%	\$ 177.12	\$ 2.54	1.45%

Southwestern Public Service Company
Bill Comparison Summary
Monthly Bills by Rate Class

Description	Monthly Bill at Current RPS		Monthly Bill at Proposed RPS and Performance Riders	
	Current RPS Riders	Rider Added Performance	Proposed RPS Riders	Performance Riders
	\$	\$	\$	\$
	\$ Change	% Change	\$ Change	% Change
<u>Irrigation Service (Summer)</u>				
1,500 kWh and 12 kW	\$ 160.36	\$ 160.67	\$ 162.26	\$ 1.90
				1.18%
7,500 kWh and 35 kW	\$ 656.18	\$ 657.73	\$ 665.72	\$ 9.54
				1.45%
15,000 kWh and 35 kW	\$ 1,214.30	\$ 1,217.39	\$ 1,233.38	\$ 19.08
				1.57%
30,000 kWh and 100 kW	\$ 2,469.94	\$ 2,476.13	\$ 2,508.11	\$ 38.17
				1.55%
<u>Irrigation Service (Non-Summer)</u>				
1,500 kWh and 12 kW	\$ 159.73	\$ 160.04	\$ 161.64	\$ 1.91
				1.20%
7,500 kWh and 35 kW	\$ 662.05	\$ 663.60	\$ 671.60	\$ 9.55
				1.44%
15,000 kWh and 35 kW	\$ 1,238.68	\$ 1,241.77	\$ 1,257.76	\$ 19.08
				1.54%
30,000 kWh and 100 kW	\$ 2,507.88	\$ 2,514.06	\$ 2,546.05	\$ 38.17
				1.52%
<u>Irrigation Service Annualized</u>				
1,500 kWh and 12 kW	\$ 159.94	\$ 160.25	\$ 161.85	\$ 1.91
				1.19%
7,500 kWh and 35 kW	\$ 660.09	\$ 661.64	\$ 669.64	\$ 9.55
				1.45%
15,000 kWh and 35 kW	\$ 1,230.55	\$ 1,233.64	\$ 1,249.63	\$ 19.08
				1.55%
30,000 kWh and 100 kW	\$ 2,495.23	\$ 2,501.42	\$ 2,533.40	\$ 38.17
				1.53%

Southwestern Public Service Company
Bill Comparison Summary
Monthly Bills by Rate Class

Description	Monthly Bill at Current RPS		Monthly Bill at Proposed RPS and Performance Riders	
	Current RPS Riders	Rider Added Performance	Current RPS Riders	Riders Performance
	\$	\$	\$	\$
			\$ Change	% Change
<u>Primary General Service (Summer)</u>				
1,500 kWh and 12 kW	\$ 302.15	\$ 302.46	\$ 0.31	0.10%
7,500 kWh and 35 kW	\$ 883.17	\$ 884.72	\$ 1.55	0.18%
15,000 kWh and 35 kW	\$ 1,058.03	\$ 1,061.13	\$ 3.10	0.29%
30,000 kWh and 100 kW	\$ 2,654.44	\$ 2,660.62	\$ 6.18	0.23%
<u>Primary General Service (Non-Summer)</u>				
1,500 kWh and 12 kW	\$ 267.35	\$ 267.66	\$ 0.31	0.12%
7,500 kWh and 35 kW	\$ 789.08	\$ 790.63	\$ 1.55	0.20%
15,000 kWh and 35 kW	\$ 981.74	\$ 984.83	\$ 3.09	0.31%
30,000 kWh and 100 kW	\$ 2,405.96	\$ 2,412.14	\$ 6.18	0.26%
<u>Primary General Service Annualized</u>				
1,500 kWh and 12 kW	\$ 278.95	\$ 279.26	\$ 0.31	0.11%
7,500 kWh and 35 kW	\$ 820.44	\$ 821.99	\$ 1.55	0.19%
15,000 kWh and 35 kW	\$ 1,007.17	\$ 1,010.26	\$ 3.09	0.31%
30,000 kWh and 100 kW	\$ 2,488.79	\$ 2,494.97	\$ 6.18	0.25%

Southwestern Public Service Company
Bill Comparison Summary
Monthly Bills by Rate Class

Description	Monthly Bill at Current RPS			Monthly Bill at Proposed RPS and Performance			
	Current RPS Riders	Rider Added Performance	\$ Change	Current RPS Riders	Rider Added Performance	\$ Change	% Change
<u>Large General Service - Transmission 69 kV (Summer)</u>							
500,000 kWh and 800 kW	\$ 22,656.66	\$ 22,759.78	\$ 103.12	\$ 23,292.89	\$ 636.23	2.81%	
1,000,000 kWh and 1,500 kW	\$ 43,688.40	\$ 43,894.64	\$ 206.24	\$ 43,998.79	\$ 310.39	0.71%	
4,000,000 kWh and 6,100 kW	\$ 172,655.81	\$ 173,480.74	\$ 824.93	\$ 173,897.33	\$ 1,241.52	0.72%	
8,000,000 kWh and 12,200 kW	\$ 342,378.06	\$ 343,928.19	\$ 1,550.13	\$ 344,711.00	\$ 2,332.94	0.68%	
<u>Large General Service - Transmission 69 kV (Non-Summer)</u>							
500,000 kWh and 800 kW	\$ 22,034.87	\$ 22,137.98	\$ 103.11	\$ 22,671.10	\$ 636.23	2.89%	
1,000,000 kWh and 1,500 kW	\$ 42,664.45	\$ 42,870.69	\$ 206.24	\$ 42,974.83	\$ 310.38	0.73%	
4,000,000 kWh and 6,100 kW	\$ 168,340.36	\$ 169,165.29	\$ 824.93	\$ 169,581.89	\$ 1,241.53	0.74%	
8,000,000 kWh and 12,200 kW	\$ 330,472.17	\$ 332,097.11	\$ 1,624.94	\$ 332,917.70	\$ 2,445.53	0.74%	
<u>Large General Service - Transmission 69 kV Annualized</u>							
500,000 kWh and 800 kW	\$ 22,242.13	\$ 22,345.25	\$ 103.12	\$ 22,878.36	\$ 636.23	2.86%	
1,000,000 kWh and 1,500 kW	\$ 43,005.77	\$ 43,212.01	\$ 206.24	\$ 43,316.15	\$ 310.38	0.72%	
4,000,000 kWh and 6,100 kW	\$ 169,778.84	\$ 170,603.77	\$ 824.93	\$ 171,020.37	\$ 1,241.53	0.73%	
8,000,000 kWh and 12,200 kW	\$ 334,440.80	\$ 336,040.80	\$ 1,600.00	\$ 336,848.80	\$ 2,408.00	0.72%	

Southwestern Public Service Company
Bill Comparison Summary
Monthly Bills by Rate Class

Description	Monthly Bill at Current RPS Riders		Monthly Bill at Current RPS Riders with Performance Rider Added		Monthly Bill at Proposed RPS Riders and Performance	
	\$	% Change	\$	% Change	\$	% Change
Large General Service - Trans 115+ kV (Summer)						
500,000 kWh and 800 kW	\$ 22,508.17		\$ 22,611.29	103.12	\$ 23,144.40	636.23
1,000,000 kWh and 1,500 kW	\$ 44,705.14		\$ 44,911.37	206.23	\$ 45,015.52	310.38
4,000,000 kWh and 6,300 kW	\$ 174,107.69		\$ 174,932.63	824.94	\$ 175,349.22	1,241.53
8,000,000 kWh and 13,000 kW	\$ 350,045.50		\$ 351,595.63	1,550.13	\$ 352,378.44	2,332.94
Large General Service - Trans 115+ kV (Non-Summer)						
500,000 kWh and 800 kW	\$ 21,895.14		\$ 21,998.26	103.12	\$ 22,531.37	636.23
1,000,000 kWh and 1,500 kW	\$ 43,479.08		\$ 43,685.31	206.23	\$ 43,789.46	310.38
4,000,000 kWh and 6,300 kW	\$ 169,417.93		\$ 170,242.87	824.94	\$ 170,659.46	1,241.53
8,000,000 kWh and 13,000 kW	\$ 336,876.45		\$ 338,501.39	1,624.94	\$ 339,321.98	2,445.53
Large General Service - Trans 115+ kV Annualized						
500,000 kWh and 800 kW	\$ 22,099.48		\$ 22,202.60	103.12	\$ 22,735.71	636.23
1,000,000 kWh and 1,500 kW	\$ 43,887.77		\$ 44,094.00	206.23	\$ 44,198.15	310.38
4,000,000 kWh and 6,300 kW	\$ 170,981.18		\$ 171,806.12	824.94	\$ 172,222.71	1,241.53
8,000,000 kWh and 13,000 kW	\$ 341,266.13		\$ 342,866.14	1,600.01	\$ 343,674.13	2,408.00

Southwestern Public Service Company
Bill Comparison Summary
Monthly Bills by Rate Class

Description	Monthly Bill at Current RPS		Monthly Bill at Proposed RPS and Performance Riders	
	Current RPS Riders	Rider Added	Current RPS Riders	Performance Riders
	\$	\$	\$	\$
			\$ Change	% Change
<u>Large Municipal and School Service (Summer)</u>				
10,000 kWh and 30 kW	\$ 749.67	\$ 751.73	\$ 2.06	0.27%
20,000 kWh and 45 kW	\$ 1,245.73	\$ 1,249.85	\$ 4.12	0.33%
30,000 kWh and 75 kW	\$ 1,957.24	\$ 1,963.43	\$ 6.19	0.32%
<u>Large Municipal and School Service (Non-Summer)</u>				
10,000 kWh and 30 kW	\$ 50.35	\$ 50.45	\$ 0.10	0.20%
20,000 kWh and 45 kW	\$ 85.12	\$ 85.33	\$ 0.21	0.25%
30,000 kWh and 75 kW	\$ 154.67	\$ 155.08	\$ 0.41	0.27%
<u>Large Municipal and School Service Annualized</u>				
10,000 kWh and 30 kW	\$ 718.28	\$ 720.34	\$ 2.06	0.29%
20,000 kWh and 45 kW	\$ 1,206.86	\$ 1,210.98	\$ 4.12	0.34%
30,000 kWh and 75 kW	\$ 1,886.98	\$ 1,893.16	\$ 6.18	0.33%
			\$ Change	% Change
			\$ 12.73	1.70%
			\$ 25.44	2.04%
			\$ 38.18	1.95%
			\$ 664.95	1320.66%
			\$ 1,127.75	1324.89%
			\$ 1,735.35	1121.97%
			\$ 12.72	1.77%
			\$ 25.44	2.11%
			\$ 38.17	2.02%

Southwestern Public Service Company
Bill Comparison Summary
Monthly Bills by Rate Class

Description	Monthly Bill at Current RPS		Monthly Bill at Current RPS with Performance Rider Added		Monthly Bill at Proposed RPS and Performance Riders	
	Current RPS Riders	\$ Change	Rider Added	\$ Change	Riders	% Change
<u>Small Municipal and School Service (Summer)</u>						
500 kWh	\$ 52.62	\$ 0.10	\$ 52.72	\$ 0.10	\$ 53.26	0.19%
1,000 kWh	\$ 89.67	\$ 0.21	\$ 89.88	\$ 0.21	\$ 90.94	0.23%
2,000 kWh	\$ 163.77	\$ 0.41	\$ 164.18	\$ 0.41	\$ 166.32	0.25%
<u>Small Municipal and School Service (Non-Summer)</u>						
500 kWh	\$ 49.21	\$ 0.10	\$ 49.31	\$ 0.10	\$ 49.84	0.20%
1,000 kWh	\$ 82.85	\$ 0.20	\$ 83.05	\$ 0.20	\$ 84.12	0.24%
2,000 kWh	\$ 150.12	\$ 0.41	\$ 150.53	\$ 0.41	\$ 152.66	0.27%
<u>Small Municipal and School Service Annualized</u>						
500 kWh	\$ 50.35	\$ 0.10	\$ 50.45	\$ 0.10	\$ 50.98	0.20%
1,000 kWh	\$ 85.12	\$ 0.21	\$ 85.33	\$ 0.21	\$ 86.39	0.25%
2,000 kWh	\$ 154.67	\$ 0.41	\$ 155.08	\$ 0.41	\$ 157.21	0.27%

\$ Change \$ 0.64 1.22%
\$ 1.27 1.42%
\$ 2.55 1.56%

\$ 0.63 1.28%
\$ 1.27 1.53%
\$ 2.54 1.69%

\$ 0.63 1.25%
\$ 1.27 1.49%
\$ 2.54 1.64%