

**BEFORE THE NEW MEXICO PUBLIC REGULATION COMMISSION**

**IN THE MATTER OF SOUTHWESTERN )  
PUBLIC SERVICE COMPANY'S )  
APPLICATION FOR APPROVAL OF ITS 2021- )  
2023 TRANSPORTATION ELECTRIFICATION )  
PLAN; PROPOSED PLAN RIDERS AND )  
CREDIT; AND OTHER ASSOCIATED RELIEF, )  
SOUTHWESTERN PUBLIC SERVICE )  
COMPANY, )  
APPLICANT. )**

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**Case No. 20-00XXX-UT**

**DIRECT TESTIMONY**

*of*

**RICHARD M. LUTH**

*on behalf of*

**SOUTHWESTERN PUBLIC SERVICE COMPANY**

**July 21, 2020**

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

<b><u>Acronym/Defined Term</u></b>	<b><u>Meaning</u></b>
Commission	New Mexico Public Regulation Commission
EV	electric vehicle
EV stations	EV charging stations
EV Rider	EV Infrastructure Rider
kW	kilowatt
kWh	kilowatt hour
Lighting	Municipal Street Lighting Service and Area Lighting Service rate classes
SPS	Southwestern Public Service Company, a New Mexico corporation
TEP	Transportation Electrification Plan
TOU	Time of Use
WACC	weighted average cost of capital

## LIST OF ATTACHMENTS

<u>Attachment</u>	<u>Description</u>
RML-1	Electric Vehicle Infrastructure Rider
RML-2	Calculation of EV Rider
RML-3	Electric Vehicle Charging Equipment Rider
RML-4	Electric Vehicle Charging Optimization Credit
RML-5	Public Electric Vehicle Charging Service
RML-6	Bill Impact of EV Rider
RML-7	Workpapers

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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 subsidiary of Xcel Energy Inc.

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

9   A. I am employed by SPS, as Manager, Pricing and Planning in Regulatory and Pricing  
10       Analysis.

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

12 A. I am responsible for the preparation of electric cost allocation studies and the  
13       development and design of retail electric rates and tariffs for SPS. These  
14       responsibilities include development of rates, terms, and conditions for proposed  
15       service contracts, and the analysis of various other regulatory and business issues  
16       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 had been a Rates Analyst and Economic Analyst with the Illinois  
7 Commerce Commission since October 1990. At the Illinois Commerce  
8 Commission, I reviewed cost-of-service, rates, and other matters involving the  
9 regulation of investor-owned public utilities.

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

15 **Q. Have you testified before any regulatory authorities?**

16 A. Yes. I have filed testimony on behalf of SPS in numerous cases before the New  
17 Mexico Public Regulation Commission ("Commission") regarding cost allocation,  
18 rate design, and tariff issues. I have also testified on behalf of SPS in numerous

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1 cases before the Public Utility Commission of Texas on the same issues. Finally,  
2 before joining SPS, I testified before the Illinois Commerce Commission on  
3 numerous occasions on various cost allocation, rate design, and tariff issues.

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1                                   **II. ASSIGNMENT AND RECOMMENDATIONS**

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

3    A.    First, I discuss the existing rates that are applicable to electric service for electric  
4           vehicle (“EV”) charging at home.

5                    Second, I discuss SPS’s proposed EV Infrastructure Rider (“EV Rider”),  
6                    which is designed to recover the cost of the SPS Transportation Electrification Plan  
7                    (“TEP”).

8                    Third, I discuss how SPS will recover its costs to provide EV charging  
9                    equipment at residential locations. EV customers can provide their own charging  
10                   equipment, or obtain charging equipment from SPS for a monthly charge,  
11                   contingent on enrolling in SPS’s EV Charging Optimization Program.

12                   Fourth, I discuss the annual \$50 credit SPS proposes to provide to customers  
13                   who participate in the EV Charging Optimization program. This credit provides an  
14                   incentive to EV customers to charge during off-peak hours.

15                   Next, I discuss SPS’s proposal for public EV charging stations (“EV  
16                   stations”) that will be operated by SPS in areas where privately-owned charging  
17                   stations may not be financially attractive to potential investors. The public charging  
18                   station service supplements SPS’s efforts to partner with commercial and municipal

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1 interests to provide EV charging throughout the SPS service area. The rate  
2 applicable for the power provided at SPS-operated charging stations is based upon  
3 how many minutes an EV is charged, with a higher rate at SPS peak hours.

4 The last section of my testimony concerns the bill impacts from SPS's  
5 proposed TEP cost recovery through the EV Rider.

6 With the EV Rider, SPS balances the basic principle of cost-based rates with  
7 a legislative goal to advance the development of the EV infrastructure. Under  
8 SPS's proposal, the EV Rider will apply to all customer classes served at secondary  
9 voltage, except the Municipal Street Lighting Service and Area Lighting Service  
10 rate classes ("Lighting"). The options in the TEP are not applicable to Municipal  
11 Street Lighting Service and Area Lighting Service installations. The EV Rider is  
12 not applicable to the Primary General Service and Large General Service –  
13 Transmission rate classes. Both of those rate classes take service at voltage levels  
14 above secondary voltage, and the EV infrastructure will be developed at secondary  
15 voltage.

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

2 A. EV charging offers customers another option for transportation, powered by  
3 electricity that is often and increasingly provided by renewable sources such as  
4 wind and solar. EV charging, including an expanded availability of EV charging  
5 stations, will allow SPS to further spread the overall cost of providing service to  
6 off-peak periods. The tariffs introduced in my testimony will allow SPS to recover  
7 the cost to start the expansion of the EV infrastructure in New Mexico as detailed  
8 in the SPS TEP, and reduce some of the costs potential EV owners may face  
9 compared to combustion-fueled transportation. The Commission should approve  
10 the four proposed tariffs in my testimony:

- 11 • Electric Vehicle Infrastructure Rider,
- 12 • Electric Vehicle Charging Equipment Rider,
- 13 • Electric Vehicle Charging Optimization Credit, and
- 14 • Public Electric Vehicle Charging Service.

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

17 A. Yes.



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1 **Q. Please explain SPS's TOU rate.**

2 A. The TOU rate is an option that charges a lower kWh energy charge during off-peak  
3 hours but a significantly higher kWh energy charge during on-peak hours. If a  
4 residential customer does not choose the TOU option, the energy charge per kWh  
5 under the standard Residential Service rate or Residential Heating Service rate  
6 remains the same regardless of when the customer takes service, although the  
7 energy charge in the four summer months of June through September is higher than  
8 in the non-summer (winter) months of October through May. The TOU off-peak  
9 charge operates differently; remaining the same during summer off-peak hours as  
10 well as all hours during non-summer months. Compared to Residential Service,  
11 the off-peak TOU kWh energy charge is 30.6% lower than the Residential Service  
12 energy charge in the summer, and 16.7% lower than the Residential Service energy  
13 charge during the off-peak winter months. If a Residential TOU customer can  
14 manage energy consumption during on-peak hours so that a higher percentage of  
15 energy consumption occurs during off-peak hours compared to an average  
16 Residential Service customer, then the TOU option will result in savings.

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1 **Q. What are the on-peak hours under the TOU option?**

2 A. On-peak hours occur during the four peak summer months of June through  
3 September, Monday through Friday, from 12 noon through 6 p.m., which averages  
4 523 hours per year. As a result, on-peak hours represent only approximately 18%  
5 of the hours that span June through September and only 6% of the total hours in a  
6 year. In contrast, off-peak hours represent 82% of the hours during the summer  
7 months and 94% of the hours in a year.

8 **B. EV Rider**

9 **Q. Please describe the proposed EV Rider.**

10 A. SPS proposes to recover the cost of developing the EV infrastructure through the  
11 EV Rider, which, as proposed, is a percentage-based charge applied to base rate  
12 revenue on customer bills. Mr. Bell discusses the SPS TEP and associated costs,  
13 which are summarized in the revenue requirement determined in the Direct  
14 Testimony of SPS witness Arthur P. Freitas. I have included the proposed EV Rider  
15 as Attachment RML-1 to my direct testimony.

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1 **Q. How was the proposed charge for the EV Rider developed?**

2 A. As shown in Attachment RML-2, the charges are based upon the revenue  
3 requirement determined by Mr. Freitas divided by estimated base rate revenue from  
4 each applicable customer class for the year 2021.

5 **Q. Why is SPS proposing a percentage-based rate applied to base rate revenue?**

6 A. The expansion of electric-powered transportation encompassed in 62-8-12 NMSA  
7 is a legislative initiative. As proposed, SPS TEP costs will be recovered from  
8 customer classes that have the opportunity to participate in the options available  
9 under the TEP. Costs incurred under the SPS TEP for facilities to charge EVs are  
10 both energy and demand-related, and will require additional customer-related costs  
11 to implement, operate, administer, manage, and evaluate the program. A  
12 percentage-based charge will therefore apply to the charges under review in a base  
13 rate case, which result from customer-related, energy-related, and capacity-related  
14 costs.

15 **Q. Will the EV Rider apply to all SPS New Mexico customer classes?**

16 A. No, it will not. The EV Rider will be charged only to secondary-voltage customer  
17 classes, other than Lighting, which means that primary and transmission-voltage  
18 customer classes are excluded from charges under the EV Rider. The exclusion of

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1 Primary General Service and Large General Service – Transmission from the  
2 recovery of EV-related costs is appropriate because the SPS TEP options, as  
3 proposed, will occur at secondary voltage service levels. Lighting rate classes are  
4 excluded because the TEP options are not available to private or public lighting  
5 facilities.

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1 **C. EV Charging Equipment Rider**

2 **Q. Please describe Attachment RML-3, EV Charging Equipment Rider.**

3 A. With the EV Charging Equipment Rider, SPS proposes a monthly charge of \$12.00  
4 to residential customers who take advantage of charging equipment provided and  
5 installed by SPS. The charge is based upon the levelized return on SPS's average  
6 investment over the course of the expected 10-year useful life of the charging  
7 equipment, plus: annual depreciation and expected maintenance costs. The  
8 levelized return on investment is based upon the 7.19% weighted average cost of  
9 capital ("WACC") authorized in SPS's recently concluded Case No. 19-00170-UT,  
10 multiplied by the average plant in service balance over the 10-year expected useful  
11 life of the charging equipment. The rate design ensures that participating customers  
12 will pay the full cost of that equipment over its expected 10-year useful life. The  
13 following table presents the calculations used in deriving the proposed monthly  
14 charge for an SPS-owned residential charger.

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**Table RML-1**

Charger	\$ 530.00
+ Installation	<u>250.00</u>
= Total Cost to Install	\$ 780.00
x Levelized 10-year Return on Investment Factor	<u>4.62%</u>
= Annual Revenue Requirement	\$ 36.01
Depreciation	78.00
Operations and Maintenance	30.00
Total Annual Revenue Requirement per Charger	\$ 144.01
÷ 12 months	<u>÷ 12</u>
= Monthly Charge for SPS-owned Charger	<u>\$ 12.00</u>

1 **Q. Does the EV Rider contain any provisions for customers that do not continue**  
2 **EV charging at home for the 10-year expected useful lifespan of the residential**  
3 **home chargers?**

4 A. Yes. A customer who ends EV charging before the 10-year period concludes will  
5 be required to pay \$200.00 for the cost to SPS to remove the charger.

6 **Q. Why is the levelized Return on Investment factor in the table set at 4.62%**  
7 **rather than the 7.19% WACC authorized in Case No. 19-00170-UT?**

8 A. The charging equipment will be depreciated over a 10-year expected useful life.  
9 Depreciation reduces the value of the investment each year the equipment is in  
10 service. As a result, the 7.19% WACC applies to a lower investment balance each

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1 year. The 4.62% levelized Return on Investment factor is applied to the initial  
2 investment balance because it represents the accumulated 7.19% return on the  
3 average annual depreciated balance over the 10 years the charging equipment is  
4 expected to be in use.

5 **D. EV Optimization Credit**

6 **Q. Please explain Attachment RML-4, EV Charging Optimization Credit.**

7 A. The EV Charging Optimization Credit provides an annual \$50.00 credit to a  
8 customer with EV charging equipment if the customer allows SPS to install  
9 equipment to monitor the times when the customer can charge an EV using the  
10 customer's equipment. Overall, the credit provides an incentive to EV customers  
11 to charge during off-peak hours, and is applied to the customer's bill for SPS  
12 electric service after the SPS peak period concludes at the end of September. SPS  
13 witness Mathias C. Bell describes the EV Charging Optimization program in his  
14 direct testimony.

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1                    **IV. SPS-OPERATED EV CHARGING STATIONS**

2    **Q.    Please explain Attachment RML-5, Public EV Charging Service.**

3    A.    SPS proposes an off-peak charge of \$1.05 per minute and \$2.10 per minute during  
4           on-peak hours at SPS-operated public EV charging stations.

5    **Q.    Will the rate for charging at SPS-operated charging stations be in effect at**  
6           **stations that are not operated by SPS?**

7    A.    No. SPS is attempting to approximate the charging rates in effect at commercial  
8           locations in areas near the SPS service area in New Mexico; however, unregulated  
9           commercial interests can charge more or less than the regulated rates at  
10          SPS-operated charging stations.

11   **Q.    How did SPS determine the proposed pricing for charging at its EV stations?**

12   A.    First, SPS determined that it was important to design rates around a cost per minute  
13          instead of a cost per kWh. This pricing structure is used by other public EV stations,  
14          and helps provide a disincentive to EV customers from simply parking at a charging  
15          station but not actually charging, preventing other customers from using the  
16          available service. If charging were based on a per kWh charge, an EV customer  
17          could pull up for a kWh-based charge, which would take approximately 10 minutes  
18          using a 150 kilowatt (“kW”) charger, but occupy the space for an hour or more as

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1 they shopped or had a meal at nearby establishments. The proposed per-minute  
2 rate is not punitive to customers that may not be able to exit the charging station  
3 immediately after charging is complete, with a 10-minute grace period allowed for  
4 non-charging before an idling fee of 53 cents per minute begins to apply,  
5 approximately half of the off-peak rate. SPS does not expect EV charging  
6 customers to typically park at a charging station, but the idling fee will provide an  
7 incentive for customers to clear charging stations in a reasonable amount of time.

8 Second, the standard rate of \$1.05 per minute was calculated to be  
9 equivalent to the pricing levels of other public fast charging facilities. At the time  
10 of filing this testimony, SPS observed that a national EV charging company located  
11 in New Mexico charged 35 cents per minute for charging at a 50 kW station. Since  
12 SPS is planning to use 150 kW charging stations, which are three times faster than  
13 the 50 kW chargers at the unregulated New Mexico commercial locations, the per-  
14 minute rate should be three times higher in order to have a comparable cost per  
15 kWh. Both per minute rates are approximately equivalent to 42 cents per kWh.

16 The proposed rate for on-peak charging is double the off-peak rate. A 100%  
17 premium for charging during on-peak hours of 12 noon through 6 p.m. on weekdays  
18 during the summer months of June through September is a strong incentive to

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1 charge during off-peak hours. A 10-minute charge that would cost \$10.50 during  
2 off-peak hours would cost \$21.00 during on-peak hours.

3 **Q. Why is the proposed on-peak rate to charge an EV at an SPS-operated EV**  
4 **station double the rate that would be charged during other hours?**

5 A. A significant increase in EV charging during the SPS system peak periods could  
6 defeat a potential benefit of the development of the EV infrastructure, which is to  
7 expand the recovery of system capacity costs during off-peak periods. Therefore,  
8 it is important to dissuade drivers from charging during peak hours. SPS could  
9 simply make the charging stations unavailable during peak hours, but concluded  
10 that charging should be available at all times if drivers urgently need a charge, with  
11 the understanding that the charge will be significantly higher than during off-peak  
12 periods.

13 **Q. What is the cost for SPS power for EV charging at a commercial location?**

14 A. Secondary General Service would be the applicable rate for a commercial customer  
15 with a 50 kW or higher charger. Secondary General Service rates resulting from  
16 recently concluded SPS Case No. 19-00170-UT averaged \$0.0841 per kWh  
17 including fuel and base rate charges for the test year ended March 31, 2019.

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1 **Q. Why is the proposed SPS-operated EV station rate equivalent to 42 cents per**  
2 **kWh if the average Secondary General Service cost per kWh is only about**  
3 **20% of that?**

4 A. The proposed charging rate recovers not only the cost to supply electric power at a  
5 fairly high level of capacity at distribution voltage, but also provides some recovery  
6 of the cost to provide the charging equipment and associated facilities at those  
7 locations. In addition, and as discussed previously, the proposed charging rate  
8 during off-peak hours at SPS EV stations is approximately the same as the rate  
9 available in non-SPS EV charging locations in New Mexico.

10 **Q. Will the rates charged at SPS-operated EV stations be sufficient to cover the**  
11 **cost of constructing and maintaining those facilities?**

12 A. It is not likely, at least in the early years of the TEP. SPS is proposing to operate  
13 EV stations in locations where it is not financially viable for private companies to  
14 do so, thereby filling a gap in the EV charging market and reduce potential range  
15 anxiety of EV drivers in the area. Cost recovery for an SPS-operated EV charging  
16 station from revenues generated by that station is contingent upon how often it is  
17 used, resulting in revenue to offset the costs to install, operate, and maintain each  
18 station. If the charging stations are used only occasionally, for example two percent

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1 of the time available, revenue generated by the SPS-operated EV stations will be  
2 insufficient to recover the expected costs. SPS proposes to include the costs to  
3 install and operate its public EV charging stations for recovery through the EV  
4 Rider, with revenue from charging at those stations offsetting the costs.

5 **Q. When do you expect SPS's first public charging station to come online?**

6 A. SPS expects its first charging station to come online in 2022. Therefore, public  
7 station revenues do not affect the proposed 2021 rider rate.

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V. **BILL IMPACT**

2 **Q. What impact will recovery of the EV Rider have on a residential customer's**  
3 **monthly bill of 750 kWh?**

4 A. Charges under the EV Rider would add approximately \$0.11 to a 750 kWh  
5 year-round average monthly residential customer's bill, or 0.1%. Attachment  
6 RML-6 includes the calculation of bill impact at different levels of usage for  
7 residential customers, as well as customers in other customer classes.

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

9 A. Yes.

**VERIFICATION**

On this day, July 20, 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**

**ORIGINAL RATE NO. 78**

**ELECTRIC VEHICLE INFRASTRUCTURE RIDER**

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**APPLICABLE:** To bills for electric service provided at secondary voltage under SPS retail rate tariffs, excluding Area Lighting and Municipal Street Lighting. For the recovery of costs to implement and operate electric vehicle (“EV”) programs.

**TERRITORY:** Area served by SPS in New Mexico.

**RIDER:** A percentage-based charge that will apply to the amount charged to each customer for all base rate charges, as provided in the applicable SPS tariff for electric service, which includes the service availability charge, energy charge, demand charge, and power factor credit or charge.

For the calendar year 2021: 0.1728% x base rate charges

Charges shown above may be modified periodically, as authorized by the New Mexico Public Regulation Commission, as a result of changes in estimated costs, EV cost recovery balances, applicable base rate revenue, or other factors that may be identified from the time this rider becomes effective.

**INTEREST ON OVER AND UNDER RECOVERY:** Monthly over- and under-recovery balances will include interest at the customer deposit interest rate set by the NMPRC each January.

Effective Date: January 1, 2021

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Advice Notice No.

DIRECTOR OF REGULATORY AND PRICING  
ANALYSIS

**Southwestern Public Service Company**

**Calculation of Electric Vehicle Infrastructure Rider  
For the 2021, 2022, and 2023 Calendar Years**

	2021	Preliminary 2022	Preliminary 2023
Electric Vehicle Revenue Requirement	\$ 281,971	\$ 423,679	\$ 608,256
divided by: Forecasted Base Rate Revenue from EV Rider Customer Classes	\$ 163,195,311	\$ 166,543,133	\$ 168,309,040
= EV Rider, % of Base Rate Revenue	<u>0.1728%</u>	<u>0.2544%</u>	<u>0.3614%</u>

Note: 2022 and 2023 are estimates that may be affected by over- or under-recovery balances from prior years, and may be revised at a later date due to changes in estimated costs and applicable base rate revenue.







**SOUTHWESTERN PUBLIC SERVICE COMPANY**  
**ORIGINAL RATE NO. 79**  
**ELECTRIC VEHICLE CHARGING EQUIPMENT RIDER**

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**APPLICABLE:** Under agreement with SPS, as described in the SPS Transportation Electrification Plan (“TEP”), to customer premises taking service under Residential Service or Residential Heating Service, and that have electric vehicle (“EV”) charging equipment at the premise installed and maintained by SPS.

In addition to charges for electric service at applicable rate, which also includes the Fuel and Purchased Power Cost Adjustment Clause, RPS Cost Rider, RPS Reconciliation Rider, Energy Efficiency Rider, and other charges that may take effect with New Mexico Public Regulation Commission authorization.

**TERRITORY:** Area served by SPS in New Mexico.

**CHARGE:** \$12.00 per month. As authorized by the New Mexico Public Regulation Commission, charge may vary periodically.

**METHOD OF PAYMENT:** A charge in addition to the charges on the customer’s bill from SPS under the applicable service tariff.

**EARLY TERMINATION:** Customer will be charged \$200.00 for the removal of EV charging equipment from the customer’s premise if the customer terminates payment before the end of the 10-year minimum time period specified in the Customer Service Agreement with SPS or the SPS TEP, as either applies to the customer’s installation.

**TAX ADJUSTMENT:** Billings under this schedule may be increased by an amount equal to the sum of the taxes payable under the Gross Receipts and Compensating Tax Act and of all other taxes, fees, or charges (exclusive of ad valorem, state and federal income taxes) payable by the utility and levied or assessed by any governmental authority on the public utility service rendered, or on the right or privilege of rendering the service, or on any object or event incidental to the rendition of the service.

Effective Date: January 1, 2021

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Advice Notice No.

DIRECTOR OF REGULATORY AND PRICING  
ANALYSIS

**SOUTHWESTERN PUBLIC SERVICE COMPANY**  
**ORIGINAL RATE NO. 80**  
**ELECTRIC VEHICLE CHARGING OPTIMIZATION CREDIT**

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**APPLICABLE:** Under agreement with SPS, as described in the SPS Transportation Electrification Plan, to customer premises taking service under Residential Service or Residential Heating Service, and that have qualifying electric vehicle (“EV”) charging equipment at the premise. Availability is restricted to EV charging equipment whose operation is able to communicate charging data to SPS through an approved vendor.

In addition to charges for electric service at applicable rate, which also includes the Fuel and Purchased Power Cost Adjustment Clause, RPS Cost Rider, RPS Reconciliation Rider, Energy Efficiency Rider, and other charges that may take effect with New Mexico Public Regulation Commission authorization.

**TERRITORY:** Area served by SPS in New Mexico.

**CREDIT:** \$50.00 per year, applied to the customer’s bill for SPS electric service in October of each year the credit is earned. As authorized by the New Mexico Public Regulation Commission, credit may be adjusted periodically.

**TAX ADJUSTMENT:** Billings under this schedule may be adjusted by an amount equal to the sum of the taxes payable under the Gross Receipts and Compensating Tax Act and of all other taxes, fees, or charges (exclusive of ad valorem, state and federal income taxes) payable by the utility and levied or assessed by any governmental authority on the public utility service rendered, or on the right or privilege of rendering the service, or on any object or event incidental to the rendition of the service.

**TERMS AND CONDITIONS:**

- Credit is earned through participation in the EV Optimization Program and will be paid to all customers enrolled at the time the credit posts to their bill;
  - Customer participation will be reviewed at the end of each calendar year;
  - A customer that does not follow their selected charging schedule equal to or more than 25% of the non-holiday week days during the calendar year will be removed from the program.

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DIRECTOR OF REGULATORY AND PRICING  
ANALYSIS

**SOUTHWESTERN PUBLIC SERVICE COMPANY**

**ORIGINAL RATE NO. 80**

**ELECTRIC VEHICLE CHARGING OPTIMIZATION CREDIT**

**TERMS AND CONDITIONS** (continued):

- If SPS determines that the charging data it receives from an approved vendor has been rendered ineffective due to tampering by use of mechanical, electrical, or other devices or actions by the customer:
  - the customer's participation in the program may be terminated;
  - SPS may rebill all prior load management credits received by the customer to the date the tampering appears to have first occurred or for the previous twelve months, whichever is longer; and
  - A customer removed from the program is only eligible to renew participation at the discretion of SPS, after SPS has verified it is able to collect accurate charging data for the customer.

**LIMITATION OF LIABILITY:** Customers who elect to participate in the EV Charging Optimization Credit program shall agree to indemnify and save harmless SPS from all personal or property claims or losses of any sort resulting from interruption of electric service under the EV Charging Optimization Credit program.

Effective Date: January 1, 2021

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Advice Notice No.
DIRECTOR OF REGULATORY AND PRICING ANALYSIS

**SOUTHWESTERN PUBLIC SERVICE COMPANY**  
**ORIGINAL RATE NO. 81**  
**PUBLIC ELECTRIC VEHICLE CHARGING SERVICE**

Page 1 of 1

**APPLICABLE:** For electric vehicle (“EV”) charging at stations operated by SPS and open to the public.

**TERRITORY:** Area served by SPS in New Mexico.

**CHARGE:** \$1.05 per minute during the months of October through May. For the months of June through September, \$2.10 per minute during peak hours of 12 noon through 6 p.m. Mountain Daylight Time, Monday through Friday, and \$1.05 per minute during all hours other than peak hours.

An idling fee of \$0.53 per minute will begin to apply if an EV remains at a charging port 10 minutes after charging is completed.

As authorized by the New Mexico Public Regulation Commission, charges may be modified periodically.

**METHOD OF PAYMENT:** Credit or debit card, or other payment methods accessible by SPS facilities. SPS is not responsible for payment methods that are not accessible for the purpose of obtaining payment at SPS-operated EV charging stations.

Effective Date: January 1, 2021

290

Advice Notice No.

DIRECTOR OF REGULATORY AND PRICING  
ANALYSIS

Southwestern Public Service Company

Bill Comparison Summary (New Mexico)  
Monthly Bills by Rate Class

Description	Monthly Bill at Present Rates	Monthly Bill with EV Rider	\$ Change	% Change
<b><u>Residential Service (Summer)</u></b>				
0 kWh	\$ 9.90	\$ 9.92	\$ 0.02	0.2%
250 kWh	\$ 35.15	\$ 35.20	\$ 0.05	0.1%
500 kWh	\$ 60.39	\$ 60.48	\$ 0.09	0.1%
750 kWh	\$ 85.64	\$ 85.77	\$ 0.13	0.2%
1,000 kWh	\$ 110.88	\$ 111.05	\$ 0.17	0.2%
2,000 kWh	\$ 211.87	\$ 212.18	\$ 0.31	0.1%
<b><u>Residential Service (Non-Summer)</u></b>				
0 kWh	\$ 9.90	\$ 9.92	\$ 0.02	0.2%
250 kWh	\$ 31.57	\$ 31.62	\$ 0.05	0.2%
500 kWh	\$ 53.24	\$ 53.32	\$ 0.08	0.2%
750 kWh	\$ 74.91	\$ 75.02	\$ 0.11	0.1%
1,000 kWh	\$ 96.58	\$ 96.72	\$ 0.14	0.1%
2,000 kWh	\$ 183.26	\$ 183.52	\$ 0.26	0.1%
<b><u>Residential Service Annualized</u></b>				
0 kWh	\$ 9.90	\$ 9.92	\$ 0.02	0.2%
250 kWh	\$ 32.76	\$ 32.81	\$ 0.05	0.2%
500 kWh	\$ 55.62	\$ 55.71	\$ 0.09	0.2%
750 kWh	\$ 78.49	\$ 78.60	\$ 0.11	0.1%
1,000 kWh	\$ 101.35	\$ 101.50	\$ 0.15	0.1%
2,000 kWh	\$ 192.80	\$ 193.07	\$ 0.27	0.1%

Southwestern Public Service Company

Bill Comparison Summary (New Mexico)  
Monthly Bills by Rate Class

Description	Monthly Bill at Present Rates	Monthly Bill with EV Rider	\$ Change	% Change
<b><u>Residential Service TOU (Summer)</u></b>				
0 kWh	\$ 10.93	\$ 10.95	\$ 0.02	0.2%
250 kWh	\$ 39.41	\$ 39.47	\$ 0.06	0.2%
500 kWh	\$ 67.89	\$ 68.00	\$ 0.11	0.2%
750 kWh	\$ 96.38	\$ 96.52	\$ 0.14	0.1%
1,000 kWh	\$ 124.86	\$ 125.05	\$ 0.19	0.2%
2,000 kWh	\$ 238.78	\$ 239.14	\$ 0.36	0.2%
<b><u>Residential Service TOU (Non-Summer)</u></b>				
0 kWh	\$ 10.93	\$ 10.95	\$ 0.02	0.2%
250 kWh	\$ 29.61	\$ 29.66	\$ 0.05	0.2%
500 kWh	\$ 48.30	\$ 48.37	\$ 0.07	0.1%
750 kWh	\$ 66.98	\$ 67.08	\$ 0.10	0.1%
1,000 kWh	\$ 85.66	\$ 85.79	\$ 0.13	0.2%
2,000 kWh	\$ 160.40	\$ 160.62	\$ 0.22	0.1%
<b><u>Residential Service TOU Annualized</u></b>				
0 kWh	\$ 10.93	\$ 10.95	\$ 0.02	0.2%
250 kWh	\$ 32.88	\$ 32.93	\$ 0.05	0.2%
500 kWh	\$ 54.83	\$ 54.91	\$ 0.08	0.1%
750 kWh	\$ 76.78	\$ 76.89	\$ 0.11	0.1%
1,000 kWh	\$ 98.73	\$ 98.88	\$ 0.15	0.2%
2,000 kWh	\$ 186.53	\$ 186.79	\$ 0.26	0.1%

Southwestern Public Service Company

Bill Comparison Summary (New Mexico)  
Monthly Bills by Rate Class

Description	Monthly Bill at Present Rates	Monthly Bill with EV Rider	\$ Change	% Change
<b><u>Residential Heat Service (Summer)</u></b>				
0 kWh	\$ 9.90	\$ 9.92	\$ 0.02	0.2%
250 kWh	\$ 35.15	\$ 35.20	\$ 0.05	0.1%
500 kWh	\$ 60.39	\$ 60.48	\$ 0.09	0.1%
750 kWh	\$ 85.64	\$ 85.77	\$ 0.13	0.2%
1,000 kWh	\$ 110.88	\$ 111.05	\$ 0.17	0.2%
2,000 kWh	\$ 211.87	\$ 212.18	\$ 0.31	0.1%
<b><u>Residential Heat Service (Non-Summer)</u></b>				
0 kWh	\$ 9.90	\$ 9.92	\$ 0.02	0.2%
250 kWh	\$ 27.31	\$ 27.35	\$ 0.04	0.1%
500 kWh	\$ 44.72	\$ 44.79	\$ 0.07	0.2%
750 kWh	\$ 62.13	\$ 62.22	\$ 0.09	0.1%
1,000 kWh	\$ 79.54	\$ 79.66	\$ 0.12	0.2%
2,000 kWh	\$ 149.19	\$ 149.40	\$ 0.21	0.1%
<b><u>Residential Heat Service Annualized</u></b>				
0 kWh	\$ 9.90	\$ 9.92	\$ 0.02	0.2%
250 kWh	\$ 29.92	\$ 29.97	\$ 0.05	0.2%
500 kWh	\$ 49.94	\$ 50.02	\$ 0.08	0.2%
750 kWh	\$ 69.97	\$ 70.07	\$ 0.10	0.1%
1,000 kWh	\$ 89.99	\$ 90.12	\$ 0.13	0.1%
2,000 kWh	\$ 170.08	\$ 170.33	\$ 0.25	0.1%

Southwestern Public Service Company

Bill Comparison Summary (New Mexico)  
Monthly Bills by Rate Class

Description	Monthly Bill at Present Rates	Monthly Bill with EV Rider	\$ Change	% Change
<b><u>Small General Service (Summer)</u></b>				
0 kWh	\$ 15.78	\$ 15.80	\$ 0.02	0.1%
250 kWh	\$ 36.28	\$ 36.33	\$ 0.05	0.1%
500 kWh	\$ 56.77	\$ 56.86	\$ 0.09	0.2%
750 kWh	\$ 77.27	\$ 77.39	\$ 0.12	0.2%
1,000 kWh	\$ 97.77	\$ 97.91	\$ 0.14	0.1%
2,000 kWh	\$ 179.76	\$ 180.02	\$ 0.26	0.1%
<b><u>Small General Service (Non-Summer)</u></b>				
0 kWh	\$ 15.78	\$ 15.80	\$ 0.02	0.1%
250 kWh	\$ 33.49	\$ 33.54	\$ 0.05	0.1%
500 kWh	\$ 51.20	\$ 51.28	\$ 0.08	0.2%
750 kWh	\$ 68.92	\$ 69.02	\$ 0.10	0.1%
1,000 kWh	\$ 86.63	\$ 86.75	\$ 0.12	0.1%
2,000 kWh	\$ 157.48	\$ 157.70	\$ 0.22	0.1%
<b><u>Small General Service Annualized</u></b>				
0 kWh	\$ 15.78	\$ 15.80	\$ 0.02	0.1%
250 kWh	\$ 34.42	\$ 34.47	\$ 0.05	0.1%
500 kWh	\$ 53.06	\$ 53.14	\$ 0.08	0.2%
750 kWh	\$ 71.70	\$ 71.81	\$ 0.11	0.2%
1,000 kWh	\$ 90.34	\$ 90.47	\$ 0.13	0.1%
2,000 kWh	\$ 164.91	\$ 165.14	\$ 0.23	0.1%

Southwestern Public Service Company

Bill Comparison Summary (New Mexico)  
Monthly Bills by Rate Class

Description	Monthly Bill at Present Rates	Monthly Bill with EV Rider	\$ Change	% Change
<b><u>Small General Service (TOU) Summer</u></b>				
0 kWh	\$ 16.81	\$ 16.84	\$ 0.03	0.2%
250 kWh	\$ 40.54	\$ 40.60	\$ 0.06	0.1%
500 kWh	\$ 64.27	\$ 64.37	\$ 0.10	0.2%
750 kWh	\$ 88.00	\$ 88.13	\$ 0.13	0.1%
1,000 kWh	\$ 111.73	\$ 111.90	\$ 0.17	0.2%
2,000 kWh	\$ 206.65	\$ 206.96	\$ 0.31	0.2%
<b><u>Small General Service (TOU) Non-Summer</u></b>				
0 kWh	\$ 16.81	\$ 16.84	\$ 0.03	0.2%
250 kWh	\$ 31.70	\$ 31.74	\$ 0.04	0.1%
500 kWh	\$ 46.58	\$ 46.65	\$ 0.07	0.2%
750 kWh	\$ 61.47	\$ 61.56	\$ 0.09	0.1%
1,000 kWh	\$ 76.36	\$ 76.46	\$ 0.10	0.1%
2,000 kWh	\$ 135.91	\$ 136.09	\$ 0.18	0.1%
<b><u>Small General Service (TOU) Annualized</u></b>				
0 kWh	\$ 16.81	\$ 16.84	\$ 0.03	0.2%
250 kWh	\$ 34.65	\$ 34.69	\$ 0.04	0.1%
500 kWh	\$ 52.48	\$ 52.56	\$ 0.08	0.2%
750 kWh	\$ 70.31	\$ 70.42	\$ 0.11	0.2%
1,000 kWh	\$ 88.15	\$ 88.27	\$ 0.12	0.1%
2,000 kWh	\$ 159.49	\$ 159.71	\$ 0.22	0.1%

Southwestern Public Service Company

Bill Comparison Summary (New Mexico)  
Monthly Bills by Rate Class

Description	Monthly Bill at Present Rates	Monthly Bill with EV Rider	\$ Change	% Change
<b><u>Secondary General Service (Summer)</u></b>				
1,500 kWh and 12 kW	\$ 308.47	\$ 308.96	\$ 0.49	0.2%
7,500 kWh and 35 kW	\$ 917.05	\$ 918.43	\$ 1.38	0.2%
15,000 kWh and 35 kW	\$ 1,103.82	\$ 1,105.33	\$ 1.51	0.1%
30,000 kWh and 100 kW	\$ 2,774.98	\$ 2,778.99	\$ 4.01	0.1%
<b><u>Secondary General Service (Non-Summer)</u></b>				
1,500 kWh and 12 kW	\$ 268.50	\$ 268.93	\$ 0.43	0.2%
7,500 kWh and 35 kW	\$ 800.47	\$ 801.66	\$ 1.19	0.1%
15,000 kWh and 35 kW	\$ 987.24	\$ 988.56	\$ 1.32	0.1%
30,000 kWh and 100 kW	\$ 2,441.91	\$ 2,445.35	\$ 3.44	0.1%
<b><u>Secondary General Service Annualized</u></b>				
1,500 kWh and 12 kW	\$ 281.82	\$ 282.27	\$ 0.45	0.2%
7,500 kWh and 35 kW	\$ 839.33	\$ 840.58	\$ 1.25	0.1%
15,000 kWh and 35 kW	\$ 1,026.10	\$ 1,027.48	\$ 1.38	0.1%
30,000 kWh and 100 kW	\$ 2,552.93	\$ 2,556.56	\$ 3.63	0.1%
<b><u>Secondary General Service (TOU) Summer</u></b>				
1,500 kWh and 12 kW	\$ 290.27	\$ 290.73	\$ 0.46	0.2%
7,500 kWh and 35 kW	\$ 981.48	\$ 982.98	\$ 1.50	0.2%
15,000 kWh and 35 kW	\$ 1,459.80	\$ 1,461.93	\$ 2.13	0.1%
30,000 kWh and 100 kW	\$ 3,288.46	\$ 3,293.35	\$ 4.89	0.1%
<b><u>Secondary General Service (TOU) Non-Summer</u></b>				
1,500 kWh and 12 kW	\$ 231.96	\$ 232.32	\$ 0.36	0.2%
7,500 kWh and 35 kW	\$ 689.93	\$ 690.93	\$ 1.00	0.1%
15,000 kWh and 35 kW	\$ 876.70	\$ 877.82	\$ 1.12	0.1%
30,000 kWh and 100 kW	\$ 2,122.25	\$ 2,125.13	\$ 2.88	0.1%
<b><u>Secondary General Service (TOU) Annualized</u></b>				
1,500 kWh and 12 kW	\$ 251.40	\$ 251.79	\$ 0.39	0.2%
7,500 kWh and 35 kW	\$ 787.11	\$ 788.28	\$ 1.17	0.1%
15,000 kWh and 35 kW	\$ 1,071.07	\$ 1,072.52	\$ 1.45	0.1%
30,000 kWh and 100 kW	\$ 2,510.99	\$ 2,514.54	\$ 3.55	0.1%

Southwestern Public Service Company

Bill Comparison Summary (New Mexico)  
Monthly Bills by Rate Class

Description	Monthly Bill at Present Rates	Monthly Bill with EV Rider	\$ Change	% Change
<b><u>Irrigation Service (Summer)</u></b>				
1,500 kWh and 12 kW	\$ 155.57	\$ 155.80	\$ 0.23	0.1%
7,500 kWh and 35 kW	\$ 632.26	\$ 633.16	\$ 0.90	0.1%
15,000 kWh and 35 kW	\$ 1,166.45	\$ 1,168.08	\$ 1.63	0.1%
30,000 kWh and 100 kW	\$ 2,374.26	\$ 2,377.58	\$ 3.32	0.1%
<b><u>Irrigation Service (Non-Summer)</u></b>				
1,500 kWh and 12 kW	\$ 151.24	\$ 151.46	\$ 0.22	0.1%
7,500 kWh and 35 kW	\$ 619.63	\$ 620.50	\$ 0.87	0.1%
15,000 kWh and 35 kW	\$ 1,153.82	\$ 1,155.42	\$ 1.60	0.1%
30,000 kWh and 100 kW	\$ 2,338.17	\$ 2,341.42	\$ 3.25	0.1%
<b><u>Irrigation Service Annualized</u></b>				
1,500 kWh and 12 kW	\$ 152.68	\$ 152.91	\$ 0.23	0.2%
7,500 kWh and 35 kW	\$ 623.84	\$ 624.72	\$ 0.88	0.1%
15,000 kWh and 35 kW	\$ 1,158.03	\$ 1,159.64	\$ 1.61	0.1%
30,000 kWh and 100 kW	\$ 2,350.20	\$ 2,353.47	\$ 3.27	0.1%
<b><u>Irrigation Service (TOU) Summer</u></b>				
1,500 kWh and 12 kW	\$ 197.82	\$ 198.12	\$ 0.30	0.2%
7,500 kWh and 35 kW	\$ 850.47	\$ 851.74	\$ 1.27	0.1%
15,000 kWh and 35 kW	\$ 1,617.35	\$ 1,619.76	\$ 2.41	0.1%
30,000 kWh and 100 kW	\$ 3,261.72	\$ 3,266.58	\$ 4.86	0.1%
<b><u>Irrigation Service (TOU) Non-Summer</u></b>				
1,500 kWh and 12 kW	\$ 123.13	\$ 123.30	\$ 0.17	0.1%
7,500 kWh and 35 kW	\$ 477.01	\$ 477.64	\$ 0.63	0.1%
15,000 kWh and 35 kW	\$ 870.44	\$ 871.55	\$ 1.11	0.1%
30,000 kWh and 100 kW	\$ 1,767.90	\$ 1,770.17	\$ 2.27	0.1%
<b><u>Irrigation Service (TOU) Annualized</u></b>				
1,500 kWh and 12 kW	\$ 148.03	\$ 148.24	\$ 0.21	0.1%
7,500 kWh and 35 kW	\$ 601.50	\$ 602.34	\$ 0.84	0.1%
15,000 kWh and 35 kW	\$ 1,119.41	\$ 1,120.95	\$ 1.54	0.1%
30,000 kWh and 100 kW	\$ 2,265.84	\$ 2,268.97	\$ 3.13	0.1%

Southwestern Public Service Company

Bill Comparison Summary (New Mexico)  
Monthly Bills by Rate Class

Description	Monthly Bill at Present Rates	Monthly Bill with EV Rider	\$ Change	% Change
<b><u>Large Municipal and School Service (Summer)</u></b>				
10,000 kWh and 30 kW	\$ 717.78	\$ 718.76	\$ 0.98	0.1%
20,000 kWh and 45 kW	\$ 1,181.94	\$ 1,183.46	\$ 1.52	0.1%
30,000 kWh and 75 kW	\$ 1,861.56	\$ 1,863.99	\$ 2.43	0.1%
<b><u>Large Municipal and School Service (Non-Summer)</u></b>				
10,000 kWh and 30 kW	\$ 646.01	\$ 646.86	\$ 0.85	0.1%
20,000 kWh and 45 kW	\$ 1,074.28	\$ 1,075.62	\$ 1.34	0.1%
30,000 kWh and 75 kW	\$ 1,682.14	\$ 1,684.26	\$ 2.12	0.1%
<b><u>Large Municipal and School Service Annualized</u></b>				
10,000 kWh and 30 kW	\$ 669.93	\$ 670.83	\$ 0.90	0.1%
20,000 kWh and 45 kW	\$ 1,110.17	\$ 1,111.57	\$ 1.40	0.1%
30,000 kWh and 75 kW	\$ 1,741.95	\$ 1,744.17	\$ 2.22	0.1%
<b><u>Large Municipal and School Service (TOU) Summer</u></b>				
10,000 kWh and 30 kW	\$ 904.65	\$ 905.95	\$ 1.30	0.1%
20,000 kWh and 45 kW	\$ 1,635.14	\$ 1,637.44	\$ 2.30	0.1%
30,000 kWh and 75 kW	\$ 2,499.57	\$ 2,503.11	\$ 3.54	0.1%
<b><u>Large Municipal and School Service (TOU) Non-Summer</u></b>				
10,000 kWh and 30 kW	\$ 556.81	\$ 557.51	\$ 0.70	0.1%
20,000 kWh and 45 kW	\$ 939.46	\$ 940.56	\$ 1.10	0.1%
30,000 kWh and 75 kW	\$ 1,456.05	\$ 1,457.78	\$ 1.73	0.1%
<b><u>Large Municipal and School Service (TOU) Annualized</u></b>				
10,000 kWh and 30 kW	\$ 672.76	\$ 673.66	\$ 0.90	0.1%
20,000 kWh and 45 kW	\$ 1,171.35	\$ 1,172.85	\$ 1.50	0.1%
30,000 kWh and 75 kW	\$ 1,803.89	\$ 1,806.22	\$ 2.33	0.1%

Southwestern Public Service Company

Bill Comparison Summary (New Mexico)  
Monthly Bills by Rate Class

Description	Monthly Bill at Present Rates	Monthly Bill with EV Rider	\$ Change	% Change
<b><u>Small Municipal and School Service (Summer)</u></b>				
500 kWh	\$ 51.03	\$ 51.10	\$ 0.07	0.1%
1,000 kWh	\$ 86.48	\$ 86.60	\$ 0.12	0.1%
2,000 kWh	\$ 157.39	\$ 157.61	\$ 0.22	0.1%
<b><u>Small Municipal and School Service (Non-Summer)</u></b>				
500 kWh	\$ 46.38	\$ 46.45	\$ 0.07	0.2%
1,000 kWh	\$ 77.19	\$ 77.30	\$ 0.11	0.1%
2,000 kWh	\$ 138.81	\$ 138.99	\$ 0.18	0.1%
<b><u>Small Municipal and School Service Annualized</u></b>				
500 kWh	\$ 47.93	\$ 48.00	\$ 0.07	0.1%
1,000 kWh	\$ 80.29	\$ 80.40	\$ 0.11	0.1%
2,000 kWh	\$ 145.00	\$ 145.20	\$ 0.20	0.1%
<b><u>Small Municipal and School Service (TOU) Summer</u></b>				
500 kWh	\$ 59.49	\$ 59.58	\$ 0.09	0.2%
1,000 kWh	\$ 102.38	\$ 102.54	\$ 0.16	0.2%
2,000 kWh	\$ 188.17	\$ 188.44	\$ 0.27	0.1%
<b><u>Small Municipal and School Service (TOU) Non-Summer</u></b>				
500 kWh	\$ 42.95	\$ 43.01	\$ 0.06	0.1%
1,000 kWh	\$ 69.29	\$ 69.38	\$ 0.09	0.1%
2,000 kWh	\$ 121.98	\$ 122.14	\$ 0.16	0.1%
<b><u>Small Municipal and School Service (TOU) Annualized</u></b>				
500 kWh	\$ 48.46	\$ 48.53	\$ 0.07	0.1%
1,000 kWh	\$ 80.32	\$ 80.43	\$ 0.11	0.1%
2,000 kWh	\$ 144.04	\$ 144.24	\$ 0.20	0.1%

WP - Calculation of Residential EV Equipment Charge

Year »	1	2	3	4	5	6	7	8	9	10
Beginning Cost	\$ 780.00	\$ 702.00	\$ 624.00	\$ 546.00	\$ 468.00	\$ 390.00	\$ 312.00	\$ 234.00	\$ 156.00	\$ 78.00
Depreciation	\$ 78.00	\$ 78.00	\$ 78.00	\$ 78.00	\$ 78.00	\$ 78.00	\$ 78.00	\$ 78.00	\$ 78.00	\$ 78.00
Depreciated cost at the end of the year	\$ 702.00	\$ 624.00	\$ 546.00	\$ 468.00	\$ 390.00	\$ 312.00	\$ 234.00	\$ 156.00	\$ 78.00	\$ -
Average Installed cost at the end of the year	\$ 741.00	\$ 663.00	\$ 585.00	\$ 507.00	\$ 429.00	\$ 351.00	\$ 273.00	\$ 195.00	\$ 117.00	\$ 39.00
Docket No. 19-00170-UT cost of capital	7.19%	7.19%	7.19%	7.19%	7.19%	7.19%	7.19%	7.19%	7.19%	7.19%
Return during the year	\$ 53.28	\$ 47.67	\$ 42.06	\$ 36.45	\$ 30.85	\$ 25.24	\$ 19.63	\$ 14.02	\$ 8.41	\$ 2.80
Return per month	\$ 3.00									
Depreciation per month	\$ 6.50									
O&M per month	\$ 2.50									
Monthly charge	<u>\$ 12.00</u>									

$$\frac{1.28387 \times \text{Gross Revenue Conversion}}{\$ 360.01} = \text{Return before taxes}$$

$$\frac{\$ 36.00}{4.62\%} = \text{Average Return per year}$$

Gross Revenue Conversion  
 7.19% Docket No. 19-00170-UT authorized after-tax rate of return  
 7.29% divided by: 1 - 1.4056% (98.5944%) state income tax rate from Docket No. 19-00170-UT  
 9.23% divided by: 1 - 21.0000% (79.0000%) federal income tax rate from Docket No. 19-00170-UT  
 1.28387 9.23% pre-tax rate of return divided by 7.19% after-tax rate of return

**Southwestern Public Service Company**

**WP - Estimate of Public EV Charging Revenue  
For the Calendar Year 2021**

	<u>2021</u>	<u>2022</u>	<u>2023</u>
EV kWh - forecast	573,270	840,667	1,487,051
x % of Public EV Charging	<u>20%</u>	<u>20%</u>	<u>20%</u>
Estimated Public EV Charging kWh	stations not	168,133	297,410
÷ minutes per hour	<u>complete</u>	<u>60</u>	<u>60</u>
Estimated Minutes of Public EV Charging		2,802.22	4,956.83
x Proposed Public EV Charge per minute		<u>\$ 1.05</u>	<u>\$ 1.05</u>
= Estimated Public EV Charging Revenue		<u>\$ 2,942</u>	<u>\$ 5,205</u>
Year #1, mid-year convention		<u>\$ 1,471</u>	