

**SOAH DOCKET NO. 473-25-09020  
PUC DOCKET NO. 57463**

<b>APPLICATION OF SOUTHWESTERN</b>	<b>§</b>	<b>BEFORE THE STATE OFFICE</b>
<b>PUBLIC SERVICE COMPANY FOR</b>	<b>§</b>	<b>OF</b>
<b>APPROVAL OF ITS TRANSMISSION</b>	<b>§</b>	<b>ADMINISTRATIVE HEARINGS</b>
<b>AND DISTRIBUTION SYSTEM</b>	<b>§</b>	
<b>RESILIENCY PLAN</b>	<b>§</b>	

**GOLDEN SPREAD ELECTRIC COOPERATIVE, INC.’S  
STATEMENT OF POSITION**

Pursuant to 16 TAC § 22.124, Golden Spread Electric Cooperative, Inc. (Golden Spread) files this statement of position in the above-captioned docket.

Golden Spread is concerned with costs associated with certain components of Southwestern Public Service Company’s (SPS) System Resiliency Plan (SRP). The SRP seeks the approval of, and cost recovery for, SPS’s proposed Communication Modernization Measure. That measure consists of three types of costs: private long-term evolution (pLTE) network costs; optical ground wire (OPGW) costs; and remote terminal unit (RTU) costs. Although SPS proposes to functionalize the pLTE network costs to general plant, SPS proposes to functionalize the OPGW and RTU costs only to transmission, despite describing that these costs will benefit SPS’s distribution system. Given the benefits to the distribution system, Golden Spread opposes the latter two proposals and instead supports functionalizing the OPGW and RTU costs either to distribution or general plant, rather than transmission. Golden Spread also supports limitations on budget flexibility, prohibiting SPS from shifting SRP costs between distribution and transmission, shifting SRP costs between capital and operations and maintenance expense, and prohibiting reallocations by SPS of more than 20% of costs among the SRP measures.

Golden Spread reserves the right to contest any issue in this proceeding. Golden Spread intends to attend the hearing on the merits and expressly reserves the right to cross-examine any witnesses presented, submit briefing, and take any other measures necessary to protect its interests. Golden Spread further requests such other relief to which it may show itself entitled.

Respectfully submitted,



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ATTORNEYS FOR GOLDEN SPREAD  
ELECTRIC COOPERATIVE, INC.

**CERTIFICATE OF SERVICE**

I certify that a true and correct copy of the foregoing document has been served on all parties of record in this proceeding as required by order or in accordance with 16 Tex. Admin. Code § 22.74, on March 19, 2025.



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Carl R. Galant