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Filing Date - 2025-02-03 01:16:04 PM

Control Number - 57463

Item Number - 29

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

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

**COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION TO
SOUTHWESTERN PUBLIC SERVICE COMPANY
QUESTION NOS. STAFF 1-1 THROUGH STAFF 1-3**

Pursuant to 16 Texas Administrative Code (TAC) § 22.144 of the Commission's Procedural Rules, the Staff (Staff) of the Public Utility Commission of Texas (Commission) requests that Southwestern Public Service Company by and through its representative of record, provide the following information and answer the following questions under oath. The questions shall be answered in sufficient detail to fully present all of the relevant facts and within the time limit provided by the agreed procedural schedule. Please copy the question immediately above the answer to each question. These questions are continuing in nature, and if there is a relevant change in circumstances, submit an amended answer, under oath, as a supplement to your original answer. State the name of the witness in this cause who will sponsor the answer to the question and can vouch for the truth of the answer.

Provide responses to the Requests for Information by filing with the Commission solely through the Interchange on the Commission's website and provide notice, by email, to all other parties that the pleading or document has been filed with the Commission, unless otherwise ordered by the presiding officer pursuant to the Second Order Suspending Rules in Project No. 50664.

Dated: February 3, 2025

Respectfully submitted,

**PUBLIC UTILITY COMMISSION OF TEXAS
LEGAL DIVISION**

Marisa Lopez Wagley
Division Director

Andy Aus
Managing Attorney

/s/ Dylan King
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CERTIFICATE OF SERVICE

I certify that unless otherwise ordered by the presiding officer, notice of the filing of this document was provided to all parties of record via electronic mail on February 3, 2025 in accordance with the Second Order Suspending Rules, issued in Project No. 50664.

/s/ Dylan King
Dylan King

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DEFINITIONS

- 1) "SPS" or "you" refers to Southwestern Public Service Company and any person acting or purporting to act on their behalf, including without limitation, attorneys, agents, advisors, investigators, representatives, employees, or other persons.
- 2) "Document" includes any written, recorded, or graphic matter, however produced or reproduced, including but not limited to correspondence, telegrams, contracts, agreements, notes in any form, memoranda, diaries, voice recording tapes, microfilms, pictures, computer media, work papers, calendars, minutes of meetings or other writings or graphic matter, including copies containing marginal notes or variations of any of the foregoing, now or previously in your possession. In the event any documents requested by this Request for Information have been transferred beyond your control, describe the circumstances under which the document was destroyed or transferred and provide an exact citation to the subject document. In the event that documents containing the exact information do not exist, but documents do exist which contain portions of the required information or which contain substantially similar information, then the definition of "documents" shall include the documents which do exist, and these documents will be provided.

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INSTRUCTIONS

- 1) Pursuant to 16 TAC § 22.144(c)(2), Staff requests that answers to the requests for information be made under oath.
- 2) Please copy the question immediately above the answer to each question. State the name of the witness in this cause who will sponsor the answer to the question and can vouch for the truth of the answer.
- 3) These questions are continuing in nature, and if there is a relevant change in circumstances, submit an amended answer, under oath, as a supplement to your original answer.
- 4) Words used in the plural shall also be taken to mean and include the singular. Words used in the singular shall also be taken to mean and include the plural.
- 5) The present tense shall be construed to include the past tense, and the past tense shall be construed to include the present tense.
- 6) If any document is withheld under any claim of privilege, please furnish a list identifying each document for which a privilege is claimed, together with the following information: date, sender, recipients or copies, subject matter of the document, and the basis upon which such privilege is claimed.
- 7) Pursuant to 16 TAC § 22.144(h)(4), if the response to any request is voluminous, please provide a detailed index of the voluminous material.
- 8) Staff requests that each item of information be made available as it is completed, rather than upon completion of all information requested.

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- Staff 1-1** Please refer to page 19 of the 1898 & Co. SPS System Resiliency Investment Study attached to SPS's application for approval of its transmission and distribution system resiliency plan (bates page 148), which describes the financial factors accounted for within the calculation of resiliency and risk Benefit-Cost Ratios (BCRs). Among these financial factors are "discounted cash flow methodology over the lifecycle of the infrastructure in mitigating events over the next 50 years – 2.5% for escalation, 6.5% for discount rate (consistent with the values established in SPS's most recent base-rate proceeding.)"
- a. Was any sensitivity analysis conducted on these assumptions? If so, how sensitive is the BCR analysis to these assumptions?
 - b. Would the calculated BCRs substantively change in response to minor changes to one or more of these parameters?
- Staff 1-2** Under 16 TAC 25.62(c)(2)(C)(iii), the resiliency plan must include an estimate or analysis of the expected effectiveness of each measure using the selected evaluation metric or criteria. Please refer to Attachment A of SPS's SRP Errata, which states "[t]he metrics SPS proposes to evaluate the effectiveness of the Wildfire Mitigation measure include calculating and reporting the number of units identified and completed in Tier 2 and 3 wildfire areas for DSP, and detailed inspections executed in Tier 2 and 3 wildfire areas." Please elaborate further on how these metrics are able to demonstrate the effectiveness of this measure.
- Staff 1-3** Please refer to Table 7-1 in the 1898 & Co. SPS System Resiliency Investment Study attached to SPS's application for approval of its transmission and distribution system resiliency plan (bates page 275), which outlines the percentage improvement in CMI for all projects with a BCR of at least 1, across all measures included in the SRP.
- a. What is the corresponding percentage improvement in CMI for projects with a $BCR < 1$?
 - b. What is the corresponding percentage improvement in CMI for all projects (with any value of BCR) included in this evaluation?