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June 27, 2025

Chairman Thomas Gleeson
Commissioner Kathleen Jackson
Commissioner Courtney Hjaltman
Public Utility Commission of Texas
1701 N. Congress Ave.
Austin, TX 78701

Re: Responses to Commissioner Hjaltman's Requests for Information

Honorable Chairman and Commissioners:

On June 19, 2025, Commissioner Hjaltman filed a memorandum that included four requests for information regarding Southwestern Public Service Company's (SPS's) proposed System Resiliency Plan (SRP). SPS respectfully submits the following responses to Commissioner Hjaltman's requests, with supporting documentation attached.

Estimated Bill Impact

1. Please provide a breakdown of the estimated increased cost to consumers monthly charges in relation to each measure of the SRP.

Attachment 1 includes separate breakdowns of the estimated monthly cost to customers for the proposed SRP, as modified by the Unanimous Stipulation and Settlement Agreement, and for each proposed measure.

Distribution Overhead Hardening Measure

2. Please provide a brief summary of the work associated with each project and the individual project BCR.

The five lowest-BCR projects in Tier 1 wildfire areas, which were removed under the Unanimous Stipulation and Settlement Agreement, are described below. These projects are listed in order from highest to lowest BCR. The raw data for these projects is provided as Attachment 2.

1. This project is a rebuild of mainline circuit VANB7048 in Potter County, which serves 347 customers, including 141 residential, 195 small C&I, 1 large C&I, and 10 critical customers. The project activities include trussing 3 poles and replacing 71 poles, 2.2 miles of

conductor, 0.2 miles of open-wire secondary, and 10 transformers, reducing the calendar age of this circuit from 10.1 years to 1.8 years.

The estimated project cost is \$1,315,679, and the quantified benefits are \$4,490,103, resulting in a BCR of 3.41.

2. This project is a rebuild of lateral circuit OLITOSO170 in Lamb County, which serves 13 customers, including 11 small C&I and 2 critical customers. The project activities include replacing 2 poles and 0.05 miles of conductor, which will reduce calendar age of the circuit from 54.1 years to 10.3 years.

The estimated project cost is \$26,525, and the quantified benefits are \$89,919, resulting in a BCR of 3.39.

3. This project is a rebuild of lateral circuit MOSS6320 in Gaines County, which serves 19 customers, including 6 residential, 8 small C&I, and 5 large C&I. The project activities include replacing 74 poles, trussing 2 poles, and adding 27 poles, reducing the average span length from 276 feet to 210 feet. The project also includes replacing 4.4 miles of conductor and 6 transformers, reducing the calendar age of the circuit from 65.9 years to 1.1 years.

The estimated project cost is \$1,049,725, and the quantified benefits are \$3,527,329, resulting in a BCR of 3.36.

4. This project is a rebuild of lateral circuit WILLIS755 in Terry County, which serves 24 customers, including 6 residential, 15 small C&I, and 3 large C&I. The project activities include replacing 108 poles, trussing 3 poles, and adding 55 poles to reduce the average span length from 312 feet to 218 feet. The project also includes replacing 7.4 miles of conductor, 5.1 miles of open-wire secondary, and 9 transformers, reducing the calendar age of the circuit from 57.7 years to 4.0 years.

The estimated project cost is \$1,323,190 and the quantified benefits are \$4,313,987, resulting in a BCR of 3.26.

5. This project is a rebuild of lateral circuit HEND6685 in Crosby County, which is on SPS's Feeder Performance Improvement Plan (FPIP) list and serves 55 customers, including 9 residential, 42 small C&I, and 4 large C&I. The project activities include replacing 116 poles, trussing 8 poles, and adding 56 new poles to reduce the average span length from 301 feet to 214 feet. The project also includes replacing 7.8 miles of conductor and 4 transformers, reducing the calendar age of circuit from 66 years to 3.1 years.

The estimated project cost is 2,182,625, and the quantified benefits are \$7,027,384, resulting in a BCR of 3.22.

Wildfire Mitigation Measure

3. Please provide a definite total estimated cost, a cost breakdown between capital and O&M expenses, and a cost breakdown by program.

The total estimated cost for the Wildfire Mitigation measure is approximately \$37.6 million. Attachment 3 breaks down this cost by program, capital investment/O&M expense, and implementation year. The discrepancy in the evidentiary record is due to wood substation conversion projects being omitted from the cost estimates.

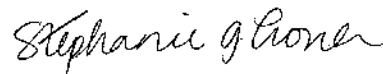
Evaluation Metrics

4. Please explain whether the removal of the Underperforming Area Count metric was intentional, and, if so, please explain the reason for removal.

This metric was intentionally removed because it became redundant with the addition of a 5-Year Rolling Average SAIFI metric. The Underperforming Area Count metric tracked circuits based on their SAIDI and SAIFI performance. As modified by the Unanimous Stipulation and Settlement Agreement the SRP now includes a 5-Year Rolling Average SAIDI metric and a 5-Year Rolling Average SAIFI metric, which respectively include the SAIDI and SAIFI performance of each circuit as part of their calculation.

We appreciate the opportunity to clarify these issues. SPS representatives will be available at the Public Utility Commission of Texas' open meeting on July 10, 2025, to answer any additional questions.

Sincerely,



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Southwestern Public Service Co. System Resiliency Plan

Estimated Bill Impacts

Total SRP Bill Impact

SRP Average Bill Impact Summary - Present to Proposed					Assumptions	
Service Class	Current Bill Annualized	Proposed Bill Annualized	Bill \$ Change	Bill % Change	Avg kWh	Avg kW
Residential	\$ 140.51	\$ 150.66	\$ 10.16	7.23%	1,000	
Small General	\$ 98.16	\$ 105.05	\$ 6.89	7.02%	700	
Secondary General	\$ 1,313.56	\$ 1,393.14	\$ 79.58	6.06%	12,800	43
Primary General	\$ 2,636.00	\$ 2,755.83	\$ 119.83	4.55%	43,200	80
LGS-T, 69kV	\$ 352,699.64	\$ 352,727.72	\$ 28.08	0.01%	7,600,000	13,000
LGS-T, 115kV	\$ 341,566.70	\$ 341,600.68	\$ 33.98	0.01%	7,600,000	13,000
Small Municipal and School	\$ 70.66	\$ 73.83	\$ 3.18	4.50%	550	
Large Municipal Primary	\$ 16,800.24	\$ 17,764.90	\$ 964.66	5.74%	207,000	630
Large Municipal Secondary	\$ 1,266.96	\$ 1,346.00	\$ 79.04	6.24%	15,400	45
Large School Primary	\$ 4,656.37	\$ 5,101.45	\$ 445.08	9.56%	53,600	158
Large School Secondary	\$ 2,022.15	\$ 2,195.11	\$ 172.96	8.55%	19,500	77
Street Lighting (per pole)	\$ 19.41	\$ 23.76	\$ 4.35	22.41%	40	
Area Lighting (per pole)	\$ 15.19	\$ 15.72	\$ 0.54	3.55%	56	

Distribution Overhead Hardening Measure

SRP Average Bill Impact Summary - Present to Proposed					Assumptions	
Service Class	Current Bill Annualized	Proposed Bill Annualized	Bill \$ Change	Bill % Change	Avg kWh	Avg kW
Residential	\$ 140.51	\$ 146.51	\$ 6.00	4.27%	1,000	
Small General	\$ 98.16	\$ 102.23	\$ 4.07	4.15%	700	
Secondary General	\$ 1,313.56	\$ 1,360.60	\$ 47.04	3.58%	12,800	43
Primary General	\$ 2,636.00	\$ 2,706.83	\$ 70.83	2.69%	43,200	80
LGS-T, 69kV	\$ 352,699.64	\$ 352,716.24	\$ 16.60	0.00%	7,600,000	13,000
LGS-T, 115kV	\$ 341,566.70	\$ 341,586.78	\$ 20.09	0.01%	7,600,000	13,000
Small Municipal and School	\$ 70.66	\$ 71.93	\$ 1.28	1.81%	550	
Large Municipal Primary	\$ 16,800.24	\$ 17,370.42	\$ 570.18	3.39%	207,000	630
Large Municipal Secondary	\$ 1,266.96	\$ 1,313.68	\$ 46.72	3.69%	15,400	45
Large School Primary	\$ 4,656.37	\$ 4,919.44	\$ 263.07	5.65%	53,600	158
Large School Secondary	\$ 2,022.15	\$ 2,124.38	\$ 102.23	5.06%	19,500	77
Street Lighting (per pole)	\$ 19.41	\$ 21.98	\$ 2.57	13.25%	40	
Area Lighting (per pole)	\$ 15.19	\$ 15.50	\$ 0.32	2.10%	56	

Distribution System Protection Modernization Measure

SRP Average Bill Impact Summary - Present to Proposed					Assumptions	
Service Class	Current Bill Annualized	Proposed Bill Annualized	Bill \$ Change	Bill % Change	Avg kWh	Avg kW
Residential	\$ 140.51	\$ 142.75	\$ 2.24	1.59%	1,000	
Small General	\$ 98.16	\$ 99.68	\$ 1.52	1.55%	700	
Secondary General	\$ 1,313.56	\$ 1,331.12	\$ 17.56	1.34%	12,800	43
Primary General	\$ 2,636.00	\$ 2,662.45	\$ 26.44	1.00%	43,200	80
LGS-T, 69kV	\$ 352,699.64	\$ 352,705.84	\$ 6.20	0.00%	7,600,000	13,000
LGS-T, 115kV	\$ 341,566.70	\$ 341,574.20	\$ 7.50	0.00%	7,600,000	13,000
Small Municipal and School	\$ 70.66	\$ 70.21	\$ (0.44)	-0.62%	550	
Large Municipal Primary	\$ 16,800.24	\$ 17,013.13	\$ 212.89	1.27%	207,000	630
Large Municipal Secondary	\$ 1,266.96	\$ 1,284.40	\$ 17.44	1.38%	15,400	45
Large School Primary	\$ 4,656.37	\$ 4,754.59	\$ 98.22	2.11%	53,600	158
Large School Secondary	\$ 2,022.15	\$ 2,060.32	\$ 38.17	1.89%	19,500	77
Street Lighting (per pole)	\$ 19.41	\$ 20.37	\$ 0.96	4.95%	40	
Area Lighting (per pole)	\$ 15.19	\$ 15.30	\$ 0.12	0.78%	56	

Southwestern Public Service Co. System Resiliency Plan

Estimated Bill Impacts

Communication Modernization Measure

SRP Average Bill Impact Summary - Present to Proposed					Assumptions	
Service Class	Current Bill Annualized	Proposed Bill Annualized	Bill \$ Change	Bill % Change	Avg kWh	Avg kW
Residential	\$ 140.51	\$ 140.98	\$ 0.47	0.33%	1,000	
Small General	\$ 98.16	\$ 98.48	\$ 0.32	0.32%	700	
Secondary General	\$ 1,313.56	\$ 1,317.24	\$ 3.68	0.28%	12,800	43
Primary General	\$ 2,636.00	\$ 2,641.55	\$ 5.54	0.21%	43,200	80
LGS-T, 69kV	\$ 352,699.64	\$ 352,700.94	\$ 1.30	0.00%	7,600,000	13,000
LGS-T, 115kV	\$ 341,566.70	\$ 341,568.27	\$ 1.57	0.00%	7,600,000	13,000
Small Municipal and School	\$ 70.66	\$ 69.40	\$ (1.25)	-1.77%	550	
Large Municipal Primary	\$ 16,800.24	\$ 16,844.88	\$ 44.64	0.27%	207,000	630
Large Municipal Secondary	\$ 1,266.96	\$ 1,270.62	\$ 3.66	0.29%	15,400	45
Large School Primary	\$ 4,656.37	\$ 4,676.96	\$ 20.59	0.44%	53,600	158
Large School Secondary	\$ 2,022.15	\$ 2,030.16	\$ 8.00	0.40%	19,500	77
Street Lighting (per pole)	\$ 19.41	\$ 19.61	\$ 0.20	1.04%	40	
Area Lighting (per pole)	\$ 15.19	\$ 15.21	\$ 0.02	0.16%	56	

Wildfire Mitigation Measure

SRP Average Bill Impact Summary - Present to Proposed					Assumptions	
Service Class	Current Bill Annualized	Proposed Bill Annualized	Bill \$ Change	Bill % Change	Avg kWh	Avg kW
Residential	\$ 140.51	\$ 141.95	\$ 1.44	1.03%	1,000	
Small General	\$ 98.16	\$ 99.14	\$ 0.98	1.00%	700	
Secondary General	\$ 1,313.56	\$ 1,324.86	\$ 11.30	0.86%	12,800	43
Primary General	\$ 2,636.00	\$ 2,653.02	\$ 17.01	0.65%	43,200	80
LGS-T, 69kV	\$ 352,699.64	\$ 352,703.63	\$ 3.99	0.00%	7,600,000	13,000
LGS-T, 115kV	\$ 341,566.70	\$ 341,571.52	\$ 4.82	0.00%	7,600,000	13,000
Small Municipal and School	\$ 70.66	\$ 69.85	\$ (0.81)	-1.14%	550	
Large Municipal Primary	\$ 16,800.24	\$ 16,937.20	\$ 136.96	0.82%	207,000	630
Large Municipal Secondary	\$ 1,266.96	\$ 1,278.18	\$ 11.22	0.89%	15,400	45
Large School Primary	\$ 4,656.37	\$ 4,719.56	\$ 63.19	1.36%	53,600	158
Large School Secondary	\$ 2,022.15	\$ 2,046.71	\$ 24.56	1.21%	19,500	77
Street Lighting (per pole)	\$ 19.41	\$ 20.03	\$ 0.62	3.18%	40	
Area Lighting (per pole)	\$ 15.19	\$ 15.26	\$ 0.08	0.50%	56	

Project ID	Project Cost	Status Quo CMI	Status Quo CMI Dollars	Status Quo Restoration Dollars
Breaker - VANB7048-Rebuild	\$1,315,679	\$1,595,264	\$5,880,097	\$1,260,591
Fuse - TS-0868-889-495-750-F1 358364100-Rebuild	\$26,525	\$14,451	\$138,828	\$25,768
Fuse - TS-0725-185-050-521-F1 143755091-Rebuild	\$1,049,725	\$559,817	\$5,874,117	\$648,012
Fuse - TS-0760-609-061-469-F1 143511030-Rebuild	\$1,323,190	\$856,710	\$6,653,236	\$699,809
Fuse - TS-1130-404-305-727-F1 145608349-Rebuild	\$2,182,625	\$1,517,726	\$11,277,864	\$1,173,603

Investment CMI	Investment CMI Dollars	Investment Restoration Dollars	Avoided CMI	Avoided CMI Dollars	Restoration Benefit Dollars	BCR
\$573,918	\$2,370,492	\$280,093	\$1,021,346	\$3,509,604	\$980,498	3.41
\$6,503	\$66,930	\$7,747	\$7,947	\$71,898	\$18,021	3.39
\$234,001	\$2,851,621	\$143,180	\$325,816	\$3,022,496	\$504,833	3.36
\$342,181	\$2,889,526	\$149,532	\$514,529	\$3,763,710	\$550,277	3.26
\$560,030	\$5,139,002	\$285,080	\$957,697	\$6,138,862	\$888,523	3.22

Total Benefit Dollars	Program Name	Protection Device ID	Circuit	County	Calendar Age	Calendar Age (Post Investment)
\$4,490,103	Backbone Rebuild	VANB7048	VANB7048	Potter	70.1	1.8
\$89,919	Lateral Rebuild	TS-0868-889-495-750-F1 358364100	OLTOSO170	Lamb	54.1	10.3
\$3,527,329	Lateral Rebuild	TS-0725-185-050-521-F1 143755091	MOSS6320	Gaines	65.9	1.1
\$4,313,987	Lateral Rebuild	TS-0760-609-061-469-F1 143511030	WELLS755	Terry	57.7	4.0
\$7,027,384	Lateral Rebuild	TS-1130-404-305-727-F1 145608349	HEND6685	Crosby	66.0	3.1

Residential Customers	Small C&I Customers	Large C&I Customers	Critical Customers	Total Customers	Status Quo Pole Count
141	195	1	10	347	92
0	11	0	2	13	4
6	8	5	0	19	86
6	15	3	0	24	127
9	42	4	0	55	137

Hardened Pole Count	Hardened Replaced Pole Count	Hardened Trussed Pole Count	Hardened New Pole Count	Hardened Pole No Change
92	71	3	0	18
4	2	0	0	2
113	74	2	27	10
182	108	3	55	16
193	116	8	56	13

Status Quo Conductor	Hardened Replaced Conductor Miles	Hardened Replaced Conductor Span Count	Hardened Conductor No Change Miles
2.2	2.2	98	0.0
0.05	0.05	3	0.0
4.5	4.4	125	0.1
7.5	7.4	216	0.1
7.8	7.8	237	0.0

Hardened Conductor No Change Span Count	Status Quo Average Span Length (ft.)	Hardened Average Span Length (ft.)	Eligible for 4kV Conversion
1	128	128	N/A
0	62	62	N/A
4	276	210	No
6	312	218	N/A
0	301	214	No

FPIP Circuit	Open Wire Secondary Replacement Miles	Line Transformer Replacement Count	Wild Fire Tier	Substation	Service Center
No	0.2	10	1	Van Buren	Amarillo
No	0.0	0	1	Olton	Plainview
No	0.0	6	1	Moss	Seminole
No	5.1	9	1	Wellman	Seminole
Yes	0.0	4	1	Hendricks	Lubbock

Region	In Plan
Texas North	TRUE
Texas South	TRUE
Texas South	TRUE
Texas South	TRUE
Texas South	TRUE

Wildfire Measure Category	Program	2025 (Mid)		2026 Capital		2027 Capital		2028 Capital		Totals		
		Capital	O&M	Capital	O&M	Capital	O&M	Capital	O&M	Capital	O&M	Total
WF Situational Awareness	1.0 Enhanced Meteorology Capabilities (Weather Stations)	\$ 662,913.07	\$ 37,343.03	\$ 679,154.44	\$ 38,257.93	\$ 903,850.11	\$ 47,066.56	\$ 712,840.67	\$ 40,155.53	\$ 2,958,758.29	\$ 162,823.04	\$ 3,121,581.34
WF Situational Awareness	2.0 Weather and Fire Science Modeling (Technosylva)	\$ 1,860,886.84	\$ 206,765.20	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 1,860,886.84	\$ 206,765.20	\$ 2,067,652.05
WF Situational Awareness	3.0 AI Cameras	\$ -	\$ -	\$ 6,423,553.53	\$ 321,177.68	\$ 6,580,930.59	\$ 658,093.06	\$ -	\$ 674,216.34	\$ 13,004,484.12	\$ 1,633,487.07	\$ 14,637,971.20
WF Situational Awareness	4.0 Risk Tier Mapping	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 296,787.07	\$ -	\$ -	\$ -	\$ 296,787.07	\$ 296,787.07
Sub Totals		\$ 2,523,799.91	\$ 344,108.23	\$ 7,102,707.97	\$ 359,435.61	\$ 7,484,780.70	\$ 1,001,946.68	\$ 712,840.67	\$ 714,371.87	\$ 17,824,129.26	\$ 2,319,862.39	\$ 20,143,991.65
WF Operational Mitigations	5.0 Defensible Space Around Poles (Distribution)	\$ -	\$ 1,340,228.18	\$ -	\$ 3,156,188.89	\$ -	\$ 3,233,515.51	\$ -	\$ 3,312,736.84	\$ -	\$ 11,242,669.22	\$ 11,242,669.22
WF Operational Mitigations	6.0 Defensible Space Around Poles (Transmission)	\$ -	\$ 47,593.15	\$ -	\$ 97,518.36	\$ -	\$ 99,907.56	\$ -	\$ 102,355.29	\$ -	\$ 347,374.36	\$ 347,374.36
WF Operational Mitigations	7.0 Wood Substation Conversion	\$ -	\$ -	\$ 472,320.11	\$ -	\$ 1,431,675.87	\$ -	\$ 991,484.62	\$ -	\$ 2,915,490.59	\$ -	\$ 2,915,490.59
WF Operational Mitigations	8.0 Wildfire Inspections (Transmission)	\$ -	\$ 218,218.50	\$ -	\$ 892,160.21	\$ -	\$ 914,018.14	\$ -	\$ 936,411.38	\$ -	\$ 2,960,808.43	\$ 2,960,808.43
Sub Totals		\$ -	\$ 1,806,039.83	\$ 472,320.11	\$ 4,145,867.46	\$ 1,431,675.87	\$ 4,247,441.21	\$ 991,484.62	\$ 4,351,503.32	\$ 2,915,490.59	\$ 14,550,852.01	\$ 17,466,342.61
Totals		\$ 2,523,799.91	\$ 2,050,148.05	\$ 7,575,028.09	\$ 4,505,303.06	\$ 8,936,456.56	\$ 5,249,387.89	\$ 1,704,335.29	\$ 5,065,875.39	\$ 20,739,619.85	\$ 16,870,714.40	\$ 37,610,334.25