



Control Number: 50804



Item Number: 6

Addendum StartPage: 0

DOCKET NO. 50804



APPLICATION OF SOUTHWESTERN §
PUBLIC SERVICE COMPANY TO §
ADJUST ITS ENERGY EFFICIENCY §
COST RECOVERY FACTOR §

PUBLIC UTILITY COMMISSION

OF TEXAS

DIRECT TESTIMONY
of
JEREMIAH W. CUNNINGHAM

on behalf of

SOUTHWESTERN PUBLIC SERVICE COMPANY

(filename: CunninghamEECRFDirect.doc; Total Pages:43)

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GLOSSARY OF ACRONYMS AND DEFINED TERMS

<u>Acronym/Defined Term</u>	<u>Meaning</u>
Commission	Public Utility Commission of Texas
DWMR	Duggins, Wren, Mann & Romero, LLP
EECRF	Energy Efficiency Cost Recovery Factor
EEPR	Energy Efficiency Plan and Report
PURA	Public Utility Regulatory Act
PY	Program Year
R&D	Research and Development
RCE	Rate Case Expense
Rule 25.181	16 Texas Administrative Code § 25.181
Rule 25.182	16 Texas Administrative Code § 25.182
Rule 25.245	16 Texas Administrative Code § 25.245
SPS	Southwestern Public Service Company, a New Mexico corporation
Staff	Staff of the Public Utility Commission of Texas
TAC	Texas Administrative Code
TIEC	Texas Industrial Energy Consumers
Xcel Energy	Xcel Energy Inc.
XES	Xcel Energy Services Inc.

LIST OF ATTACHMENTS

<u>Attachment</u>	<u>Description</u>
JWC-1	Summary of Rate Case Expenses and Adjustments from Docket No. 49495 (Filename: JWC-1.xlsx)
JWC-2	Rate Case Expenses from Docket No. 49495 Allocated by Phase (Filename: JWC-2.xlsx)
JWC-3(CD)	Workpapers of Jeremiah W. Cunningham (Various files on CD)

**DIRECT TESTIMONY
OF
JEREMIAH W. CUNNINGHAM**

1 **I. WITNESS IDENTIFICATION AND QUALIFICATIONS**

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

3 A. My name is Jeremiah W. Cunningham. My business address is 790 S. Buchanan
4 St., 7th Floor, 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. (“Xcel Energy”).

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

10 A. I am employed by SPS as Manager – Rate Cases.

11 **Q. Please briefly outline your responsibilities as Manager – Rate Cases.**

12 A. I am responsible for managing the development, filing, and processing of rate
13 cases and other regulatory filings for SPS. More specifically, I direct case teams
14 from various areas within SPS and Xcel Energy Services Inc. (“XES”) and
15 provide direction and overall management support for rate case and other filing
16 preparations. My department facilitates the development of policy issues and
17 advocacy to be included in regulatory filings, and it coordinates the overall
18 preparation of filed testimony, attachments, schedules, and workpapers to produce
19 filings in accordance with applicable rules and procedures in the regulatory
20 jurisdictions in which SPS operates.

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

2 A. I graduated from Southeastern Oklahoma State University with a Bachelor of Arts
3 degree in English in 2003.

4 **Q. Have you attended any courses or seminars related to public utilities?**

5 A. Yes. I have completed the Public Utilities Report Guide training and attended
6 Essentials of Regulatory Finance hosted by S&P Global Market Intelligence.

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

8 A. After a ten-year career in the field of education, I began my utilities career with
9 SPS in October 2013, as a regulatory administrator.

10 In April 2014, I accepted a promotion to Case Specialist in the Rates and
11 Regulatory Affairs department. In that role, I managed SPS regulatory case
12 filings before the Public Utility Commission of Texas (“Commission”), with an
13 emphasis on energy efficiency and rate-case expenses (“RCEs”). I also assisted
14 with the preparation and prosecution of multiple base-rate cases in both the Texas
15 and New Mexico jurisdictions. In July 2016, I accepted my current position as
16 Manager – Rate Cases.

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

2 A. Yes. I have filed testimony before this Commission in Docket Nos. 46328¹ and
3 47588² in support of settlements in SPS's most recent RCE dockets. I have also
4 filed testimony in Docket Nos. 49690³ and 50556⁴ regarding SPS's applications to
5 implement net refunds for over-collected fuel costs.

¹ See *Review of Rate Case Expenses Incurred by Southwestern Public Service Company* in Docket No. 45524, Docket No. 46328, Final Order (Mar. 29, 2018).

² See *Review of Rate Case Expenses Incurred by Southwestern Public Service Company* in Docket No. 47527, Docket No. 47588, Final Order (Aug. 29, 2019).

³ See *Application of Southwestern Public Service Company to Implement a Net Refund for Over-collected Fuel Costs*, Docket No. 49690, Final Order (Dec. 13, 2019).

⁴ See *Application of Southwestern Public Service Company to Implement a Net Refund for Over-collected Fuel Costs*, Docket No. 50556 (pending).

1 **II. TESTIMONY ASSIGNMENT AND SUMMARY**

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

3 A. The purpose of my testimony is to describe and support the reasonableness of
4 SPS's RCEs incurred in preparing, prosecuting, and settling Docket No. 49495,
5 its 2019 Energy Efficiency Cost Recovery Factor ("EECRF") application.
6 Specifically, my testimony:

- 7 • describes the nature and scope of SPS's filing in Docket No. 49495;
8 • describes the basis for the RCEs addressed in this docket; and
9 • supports the reasonableness of the RCEs being reviewed.

10 **Q. Please describe your experience as it relates to the review and recovery of**
11 **RCEs.**

12 A. In my former position as Case Specialist and now as Manager – Rate Cases, I
13 have had frequent contact with the persons primarily responsible for reviewing
14 the reasonableness and necessity of the invoices submitted to SPS in association
15 with ratemaking proceedings before the Commission including, base-rate cases,
16 fuel reconciliations, EECRF filings, and RCE recovery dockets. Through these
17 roles, I have also gained familiarity with the prevailing hourly rates associated
18 with individuals and the firms that provide legal services in connection with
19 regulatory proceedings before the Commission. I am also familiar with the range
20 of services provided by outside attorneys in connection with such cases, as well as
21 the amount of time and effort expended in performing such engagements.

1 **Q. What amount of RCEs was incurred by SPS in Docket No. 49495?**

2 A. SPS incurred a total of \$26,815.15 in RCEs in Docket No. 49495, as shown in
3 Attachment JWC-1, page 1. Of that total, \$26,580.24 was for outside legal
4 expenses and consultant fees. The remaining \$234.91 in RCEs was for postage
5 costs and internal processing service fees associated with the filing and case
6 management of Docket No. 49495.

7 **Q. Did SPS make any adjustments to the RCEs?**

8 A. No.

9 **Q. How are you presenting your testimony on this topic?**

10 A. Subsection (c) of 16 Tex. Admin. Code (“TAC”) § 25.245 (“Rule 25.245”) sets
11 forth criteria for the review and determination of the reasonableness of RCEs. My
12 testimony provides a good-faith attempt to address the criteria as applied to SPS’s
13 EECRF-related RCEs incurred in Docket No. 49495.

14 **Q. Does your testimony demonstrate the reasonableness of SPS’s EECRF RCEs**
15 **under Rule 25.245?**

16 A. Yes, as I discuss further below.

17 **Q. How are the RCEs presented in Attachment JWC-1?**

18 A. Attachment JWC-1, page 1 provides a summary of the RCEs incurred in Docket
19 No. 49495 and requested by SPS in this proceeding. The summary provided on
20 page 1 breaks down the RCEs between outside legal costs, consultant fees, and
21 internal employee costs by month. Attachment JWC-2 provides an allocation of
22 requested RCEs to the phases in Docket No. 49495.

1 **Q. You state that Attachment JWC-2 presents SPS's requested RCEs by phase.**
2 **Please explain how this allocation was performed.**

3 **A.** First, with Docket No. 49495 being settled with no discernable issues, in order to
4 comply with Rule 24.245(b)(6), SPS has allocated the RCEs to phases rather than
5 to issues. For Docket No. 49495, those phases are the policy, program, and cost
6 allocation and rate design phases. Second, the expenses were divided into three
7 groups. The first group is expenses that could be directly assigned to a phase.
8 Those expenses are presented in Attachment JWC-2, lines 1-6.

9 The second group includes expenses that relate to or are intertwined with
10 all three phases and, thus, are not capable of being directly allocated to a specific
11 phase. These amounts include work on testimony, discovery, and settlement
12 activities. There is no practical way to assign these expenses to a single phase.
13 For example, with respect to discovery, it would be impractical, for an attorney
14 reviewing a set of discovery questions that covers topics spanning multiple phases
15 to spend time recording 0.1 hour increments to particular phases for reviewing
16 every single question. Consequently, an allocation factor was developed for each
17 of these expense categories. These expenses are presented in Attachment JWC-2,
18 lines 7-13.

19 Finally, there were some costs that could not be directly assigned or
20 allocated to a particular phase. These expenses are related to general matters,
21 such as preparing the EECRF application, pre-filing meetings, procedural matters,
22 and the settlement work. For these costs, an allocator was developed based on the

1 allocation of the directly assigned and allocated costs by phase to the total costs.

2 These expenses are presented in Attachment JWC-2, lines 14-20.

3 **Q. Are you the only SPS witness testifying in this proceeding?**

4 A. No. SPS is presenting the testimony of three other witnesses to address policy,
5 program, and cost allocation – rate design matters in this docket.

6 **Q. Do you have any attachments to your testimony?**

7 A. Yes. Attachments JWC-1 through JWC-3(CD) are included along with this
8 testimony.

9 **Q. Are Attachments JWC-1 through JWC-3(CD) true and correct copies of the**
10 **documents you represent them to be or prepared by you or under your**
11 **supervision, as applicable?**

12 A. Yes.

1 **III. Background of SPS's 2019 EECRF Filing in Docket No. 49495**

2 **Q. When did SPS make its EECRF filing in Docket No. 49495?**

3 A. SPS filed its application to adjust its EECRF on May 1, 2019. In conformity with
4 16 TAC § 25.182(d)(10), SPS's filing included testimony and schedules, in Excel
5 format with formulas intact, as well as the required categories of information
6 under 16 TAC § 25.181, as applicable. In addition to its EECRF application, SPS
7 submitted the Direct Testimonies of Mr. Jeremy M Lovelady, Mr. J. Derek
8 Shockley, and Mr. Jason N. Smith. SPS also provided an affidavit from Mr.
9 Stephen J. Davis in support of its RCEs incurred in Docket No. 48324 (SPS's
10 2018 EECRF proceeding). The affidavit of Mr. Davis was Attachment JML-6 to
11 Mr. Lovelady's testimony in Docket No. 49495.

12 **Q. What relief did SPS request in that application?**

13 A. SPS sought similar relief as it seeks in this current application for Program Year
14 ("PY") 2021, but for PY 2020. In particular, SPS sought findings from the
15 Commission that were for PY 2020:

- 16 (1) the programs proposed by SPS were cost-effective;
17
18 (2) the affiliate costs were reasonable as set forth under PURA⁵
19 § 36.058;
20
21 (3) the Research and Development ("R&D") expenses were
22 lower than the caps set forth in 16 TAC § 25.181(g);
23
24 (4) the incentives forecasted to be paid were lower than the cap
25 in 16 TAC § 25.181(f);

⁵ Public Utility Regulatory Act, Tex. Util. Code §§ 11.001–66.016 ("PURA").

- 1 (5) as a result of the plan, SPS would be expected to achieve the
2 required demand and energy savings reductions;
- 3 (6) the RCEs incurred by SPS in its 2018 EECRF proceeding
4 (Docket No. 48324) were reasonable and necessary; and
5
- 6 (7) an EECRF rider could be implemented to recover the
7 program and administrative costs.
8

9 **Q. Did any parties intervene in Docket No. 49495?**

10 A. Yes, Texas Industrial Energy Consumers (“TIEC”) intervened. Commission Staff
11 (“Staff”) also participated in Docket No. 49495.

1 **A. Novelty and Complexity of the Issues Addressed**

2 **Q. Did Docket No. 49495 present any new or complex issues, compared to prior**
3 **SPS EECRF proceedings?**

4 A. No. All issues presented in Docket No. 49495 had been addressed in prior SPS
5 EECRF proceedings or were routine requests for relief that had been approved in
6 previous SPS EECRF proceedings. However, SPS's demand savings goal
7 calculation did require extra focus and review due to the fact that SPS for the first
8 time had met the "trigger" in 16 TAC § 25.181(e)(1)(B) and thus had to change
9 how its demand savings goal was calculated.

10 **Q. In Docket No. 49495, were issues raised that ultimately required rebuttal**
11 **testimony and litigation?**

12 A. No. The parties were able to resolve the proceeding through an unopposed
13 stipulation.

14 **B. Discovery**

15 **Q. Did SPS receive discovery from any party in Docket No. 49495?**

16 A. Yes. SPS received two sets of discovery from Staff.

17 **C. Unopposed Stipulation**

18 **Q. How did the parties reach an unopposed stipulation?**

19 A. Based on discovery responses and informal discussions, SPS, Staff, and TIEC
20 resolved all issues relating to Docket No. 49495. Accordingly, SPS drafted an
21 unopposed stipulation and circulated it to Staff and TIEC for their review,
22 comments, and edits. SPS also filed an agreed joint motion to amend the

1 procedural schedule to allow for the stipulation to be further considered and
2 finalized.

3 **Q. Did either party oppose the stipulation?**

4 A. No. Staff joined the stipulation and TIEC was unopposed.

5 **Q. When was the unopposed stipulation filed?**

6 A. On July 31, 2019.

7 **Q. When did the Commission issue a final order in Docket No. 49495?**

8 A. The Commission issued a final order adopting the unopposed stipulation on
9 September 27, 2019.

1 **Q. What types of work did the DWMR attorneys perform on behalf of SPS in**
2 **Docket No. 49495?**

3 A. The DWMR attorneys' work during Docket No. 49495 was at the direction of Mr.
4 Mark Walker, who was lead in-house XES attorney in Docket No. 49495, and in
5 coordination with internal XES personnel. In particular, the DWMR attorneys
6 performed a variety of tasks during the preparation and prosecution of Docket No.
7 49495, including:

- 8 • assisting SPS with the preparation of the annual Energy Efficiency Plan
9 and Report ("EEPR");
- 10 • drafting the application;
- 11 • assisting witnesses with the preparation of their direct testimonies,
12 attachments, and workpapers;
- 13 • assisting SPS regulatory staff with the preparation of RCE supporting
14 materials;
- 15 • assisting witnesses and SPS regulatory staff in preparing discovery
16 responses; and
- 17 • participating in settlement negotiations and drafting the resulting
18 stipulation and proposed order.

19 **Q. Did SPS agree to pay the DWMR attorneys' hourly rates for the work they**
20 **did on the case?**

21 A. Yes. DWMR's hourly fees were negotiated based upon the scope of the
22 engagement and the customary fees for regulatory attorneys retained by SPS.

23 **Q. Was it reasonable and necessary for SPS to retain DWMR to represent it in**
24 **Docket No. 49495?**

25 A. Yes. While Mr. Walker was the lead attorney for SPS and provided substantial
26 assistance, he was also responsible for a number of other legal and regulatory

1 matters regarding SPS's operations in both Texas and New Mexico, including
2 base rate cases filed in both states during the prosecution of this case. Given these
3 other responsibilities and work load, Mr. Walker would not have been able to
4 adequately prepare and prosecute Docket No. 49495 without assistance from
5 outside counsel.

6 **Q. Did SPS retain any outside consultants to provide testimony in Docket**
7 **No. 49495?**

8 A. No. All of the witnesses were either SPS or XES employees.

9 **Q. Did SPS or its outside attorneys retain any non-testifying consultants to assist**
10 **with preparation of the RCEs or testimony and to assist with the prosecution**
11 **of the case?**

12 A. Yes. As I noted above, Mr. Davis was a non-testifying, consulting expert retained
13 by DWMR on behalf of SPS to evaluate the reasonableness of SPS's 2018
14 EECRF RCEs requested in Docket No. 49495.

15 **Q. Was the retention of Mr. Davis reasonable?**

16 A. Yes. Utilities routinely retain experts, both testifying and consulting, to assist in
17 requests for recovery of RCEs. Notably, SPS had retained Mr. Davis to review
18 and prepare an affidavit in support of its request for recovery of RCEs in each of
19 its last three EECRF proceedings. Mr. Davis's fees billed in the 2019 EECRF
20 proceeding were significantly less than in past cases.

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2. Other Expenses

Q. In addition to outside legal and consultant costs, were other costs incurred for Docket No. 49495?

A. Yes. SPS incurred \$128.32 in postage costs. These expenses are presented in Attachment JWC-1, page 1, line 25. The bulk of the postage costs are related to providing service copies of documents. In addition, SPS incurred \$106.59 in internal processing service fees.

Q. What is an internal processing service fee?

A. Internal processing service fees reflect the costs associated with processing invoices for outside services, including consultants and legal services. These fees are associated with invoices that are paid through the supply-chain department.

Q. Are the internal processing fees requested in this docket related only to SPS's 2019 EECRF?

A. Yes. Expenses related to prosecuting SPS's EECRF are booked to a unique internal order (similar to a sub-ledger). The internal processing fees are only applied for those invoices booked to the unique internal order meaning that the internal processing fees are unique to SPS's 2019 EECRF.

1 **Q. Are internal processing service fees necessary EECRF-related expenses?**

2 A. Yes. As I stated above, while Mr. Walker was the lead attorney for SPS in
3 Docket No. 49495, and provided substantial assistance, he was also responsible
4 for a number of other legal and regulatory matters regarding SPS's operations in
5 both Texas and New Mexico. Given these other responsibilities and work load,
6 Mr. Walker would not have been able to adequately prepare and prosecute Docket
7 No. 49495 without assistance from outside counsel. The internal processing fees
8 incurred for Docket No. 49495 were simply small charges related to processing
9 the invoices for these necessary outside services and therefore should be
10 considered reasonable.

1 **IV. REVIEW OF RCEs INCURRED IN DOCKET NO. 49495**

2 **Q. What do you discuss in this section of your testimony?**

3 A. As stated earlier in my testimony, SPS has not made any adjustments to the RCEs
4 for which it is seeking recovery in this case. In this section of my testimony, I
5 discuss the review process I utilized to determine that adjustments were
6 unnecessary and the supporting documents I provide in my Workpapers, which
7 are attached to this testimony as Attachment JWC-3(CD).

8 **Q. What process did SPS use to review the Docket No. 49495 RCEs before**
9 **requesting recovery?**

10 A. First, a separate Internal Order (similar to a subledger) is maintained for work on
11 SPS's EECRF proceedings. Within that specified Internal Order, the RCEs
12 booked are coded so as to be discernable as RCEs. Furthermore, no costs booked
13 to that specified Internal Order are recovered outside of the EECRF.

14 Next, SPS regulatory personnel reviewed each expense identified as a
15 RCE from the Internal Order based on the entry and the receipt/invoice to
16 determine if it was appropriately charged to the Internal Order and if it was a
17 recoverable expense. Expenses that were mistakenly charged to the Internal
18 Order were removed through a journal entry process. Expenses, such as alcohol,
19 expenses without itemized receipts, and meals over \$25 per person were noted.

20 Next, the expenses were grouped according to the month they were
21 booked, and were detailed on a spreadsheet, provided as a workpaper to
22 Attachment JWC-1, which identifies the reason for the expense, the amount of the
23 expense, and the individual that incurred the expense. Finally, SPS personnel

1 grouped all receipts and invoices by month, then by category of expense, and
2 finally by who incurred the expense. These receipts and invoices are also included
3 as part of my Workpapers, which are provided as Attachment JWC-3(CD) to this
4 testimony.

5 **Q. During the review process, did SPS identify any expenses that should be**
6 **adjusted out of the requested recovery?**

7 A. No. SPS did not incur any costs for meals, alcohol, travel, or hotels which are the
8 normal instances where some expenses cannot be recovered. SPS's only expenses
9 outside of legal and consultant costs were the noted \$234.91 of postage expenses
10 and internal processing fees. Furthermore, I have reviewed SPS's outside legal
11 costs and no attorney worked in excess of 12 hours per day. I have provided a
12 schedule of attorney hours worked as part of my Workpapers.

13 **Q. Can you attest to the reasonableness and necessity of the incurrence of each**
14 **and every RCE that SPS incurred for this docket?**

15 A. Yes. My staff and I have reviewed each and every RCE item that SPS incurred
16 for this docket and the incurrence of each and every one of those expenses was
17 reasonable and necessary.

1 **V. REASONABLENESS OF SPS'S 2019 EECRF RCEs**

2 **Q. Has SPS provided sufficient information and documentation that details all**
3 **of its requested RCEs?**

4 A. Yes. As described above, I have attached the invoices, expense account
5 information, and other supporting documentation to support the necessity and
6 reasonableness of the RCEs incurred by SPS in Docket No. 49495. In sum, SPS
7 has provided adequate documentation, in the same form and level as that provided
8 by SPS in past EECRF proceedings and other RCE recovery dockets.

9 **Q. Were the tasks performed by, or time spent on a task by the DWMR**
10 **attorneys or Mr. Davis extreme or excessive?**

11 A. No. Based on my experience, the types and amount of work performed by the
12 DWMR attorneys and Mr. Davis was consistent with that performed in past cases
13 and was reasonable and justified given the nature of the EECRF proceeding.

14 **Q. Were the hourly fees charged by and paid to DWMR and Mr. Davis extreme**
15 **or excessive?**

16 A. No. In my opinion, the DWMR attorneys' and Mr. Davis's hourly rates are
17 reasonable. Based on my experience and review of the underlying documentation,
18 the hourly rates charged are: (1) commensurate with the DWMR attorneys' and
19 Mr. Davis's experience and the types of cases upon which each professional has
20 worked; and (2) consistent with prevailing hourly rates for utility lawyers
21 practicing before the Commission.

1 **Q. Was the DWMR attorneys' work duplicative of the work Mr. Walker**
2 **performed?**

3 A. No. SPS manages the work of its outside counsel to avoid duplication of effort.
4 For example, specific witnesses were assigned to specific attorneys and outside
5 attorneys generally provided legal assistance for issues specific to their assigned
6 witnesses. As a result, duplication of work was generally avoided through the
7 initial assignment of specific witnesses to specific attorneys.

8 Further, drafting of the unopposed stipulation, proposed order, and
9 associated motions was performed by Mr. Pearsall, with Mr. Walker reviewing,
10 editing, and providing input for finalization purposes.

11 **Q. Are the requested RCEs as a whole disproportionate, excessive, or**
12 **unwarranted in relation to the nature and scope of Docket No. 49495?**

13 A. No. The requested RCEs do not appear to me to be disproportionate, excessive,
14 or unwarranted for an EECRF proceeding based upon my experience in similar
15 matters before the Commission.

16 **Q. Did SPS propose anything in Docket No. 49495 that had no basis in law,**
17 **policy, or fact and was not warranted by any reasonable argument for the**
18 **extension, modification, or reversal of Commission precedent?**

19 A. No. As noted above, SPS raised no new or unprecedented issues in Docket No.
20 49495.

1 **Q. Are the RCEs that SPS is seeking recovery of for its 2019 EECRF proceeding**
2 **reasonable and necessary?**

3 A. Yes. I have considered the factors included in 16 TAC § 25.245 in reviewing the
4 RCEs that SPS incurred in its 2019 EECRF proceeding. Based on my training
5 and experience in regulatory matters as well as litigating SPS's prior EECRF
6 cases, I conclude that the RCEs incurred in SPS's 2019 EECRF proceeding are
7 reasonable and necessary considering the complexity of the case, the number of
8 issues addressed, the amount of money involved, the responsibilities assigned to
9 outside lawyers and consultants, and the benefits derived by SPS from the
10 participation of these individuals.

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

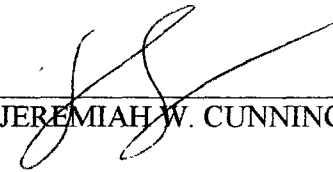
12 A. Yes.

AFFIDAVIT

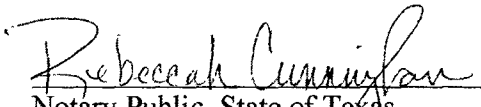
STATE OF TEXAS)
)
COUNTY OF POTTER)

JEREMIAH W. CUNNINGHAM, first being sworn on his oath, states:

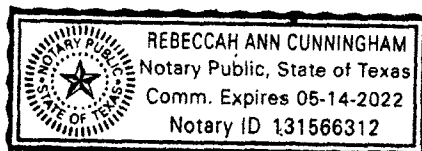
I am the witness identified in the preceding prepared direct testimony. I have read the testimony and the accompanying attachments and am familiar with their contents. Based upon my personal knowledge, the facts stated in the testimony are true. In addition, in my judgment and based upon my professional experience, the opinions and conclusions stated in the testimony are true, valid, and accurate.


JEREMIAH W. CUNNINGHAM

Subscribed and sworn to before me this 26th day of April, 2020 by
JEREMIAH W. CUNNINGHAM


Notary Public, State of Texas

My Commission Expires: 5/14/2022



CERTIFICATE OF SERVICE

I certify that on May 1, 2020, this instrument was filed with the Public Utility Commission of Texas, and a true and correct copy of it was served on the Staff of the Public Utility Commission of Texas by hand delivery, Federal Express, regular first class mail, certified mail, or facsimile transmission.



Southwestern Public Service Company

Summary of Rate Case Expenses
Incurred in Docket No. 49495

Line No.		Expenses									
		Mar-19	Apr-19	May-19	Jun-19	Jul-19	Aug-19	Sep-19	Oct-19	Nov-19	To Date
1	Legal Counsel										
2	Duggins Wren										
3	Regulatory Counsel										
4	Professional Fees	\$ 175.00		\$ 13,248.00		\$ 4,767.00		\$ 4,532.00		\$ 571.00	
5	Adjustments Made to Professional Fees										
6	Expenses					452.99		64.25		\$ 40.00	
7	Adjustments Made to Expenses										
8	Total Charges	\$ 175.00	\$ -	\$ 13,248.00	\$ -	\$ 5,219.99		\$ 4,596.25	\$ -	\$ 611.00	\$ 23,850.24
9	Total Legal Counsel	\$ 175.00	\$ -	\$ 13,248.00		\$ 5,219.99		\$ 4,596.25		\$ 611.00	\$ 23,850.24
10	Consultant Expenses										
11	Law Offices of Stephen J. Davis, PC										
12	Professional Fees	\$ -	\$ -	\$ 2,730.00	\$ -						
13	Total Charges	\$ -	\$ -	\$ 2,730.00	\$ -	\$ -	\$ -	\$ -			\$ 2,730.00
14	Total Consultant Expenses	\$ -	\$ -	\$ 2,730.00	\$ -	\$ -	\$ -	\$ -	\$ -		\$ 2,730.00
14	Employee Expenses										
15	Employee and Other Expenses										
16	Airfare										
17	Airfare - Service Fees										-
18	Car Rental										-
19	Car Rental - Gas										-
20	Car Rental - Service Fee										-
21	Equipment Rental										-
22	Hotel										-
23	Hotel - Service Fee										-
24	Lodging Tax										-
25	Mailings/Freight/Postage			38.68	81.84		7.80				\$ 128.32
26	Materials - Non-Inventory										-
27	Meals										-
28	Notice										-
29	Office Supplies										-
30	Outside Vendor - Contract Employees										-
31	Other										-
32	Overtime Payroll										-
33	Parking										-
34	Personal Car Mileage										-
35	Printing (Sir Speedy)										-
36	Service Fees	0.72		48.15		29.07		27.33		1.32	\$ 106.59
37	Taxi/Bus/Other										-
38	Telephone										-
39	Temporary Employees										-
40	Tip (s)										-
41	Adjustments Made to Employee Expenses										-
42	Total Miscellaneous Expenses	\$ 0.72	\$ -	\$ 86.83	\$ 81.84	\$ 29.07	\$ 7.80	\$ 27.33		\$ 1.32	\$ 234.91
43	TOTAL RATE CASE EXPENSES BOOKED	\$ 175.72	\$ -	\$ 16,064.83	\$ 81.84	\$ 5,249.06	\$ 7.80	\$ 4,623.58	\$ -	\$ 612.32	\$ 26,815.15
44	TOTAL EXCLUSIONS BY MONTH										\$ -
45	TOTAL RATE CASE EXPENSES REQUESTED	\$ 175.72	\$ -	\$ 16,064.83	\$ 81.84	\$ 5,249.06	\$ 7.80	\$ 4,623.58		\$ 612.32	\$ 26,815.15

Southwestern Public Service Company

Allocation of Requested RCEs Incurred
by SPS in Docket No. 49495 by Phase

Line No.	Description	Total RCEs Requested by SPS	Policy Phase	Program Phase	Cost Allocation & Rate Design Phase	check
1	Amounts Directly Assigned to Phase					
2	Rate Case Expenses from 49495	\$ 4,200.00	\$ 4,200.00	\$ -	\$ -	\$ 4,200.00
3	Policy Direct Testimony	3,009.00	3,009.00	-	-	3009
4	Program Direct Testimony	945.00	-	945.00	-	945
5	Cost Allocation-Rate Design Direct Testimony	1,015.00	-	-	1,015.00	1015
6	Total Amount Direct Assigned to Phase	\$ 9,169.00	\$ 7,209.00	\$ 945.00	\$ 1,015.00	\$ 9,169.00
7	Amounts Allocated on Testimony Page Counts					
8	Allocated Direct Testimony Costs	\$ 70.00	\$ 35.31	\$ 17.35	\$ 17.35	\$ 70.00
9	Total Allocated Testimony Amounts	\$ 70.00	\$ 35.31	\$ 17.35	\$ 17.35	\$ 70.00
10	Amounts Allocated on Discovery Allocators					
11	Discovery	\$ 847.80	\$ 549.90	\$ 248.90	\$ 49.00	\$ 847.80
12	Total Allocated of Discovery Costs	\$ 847.80	\$ 549.90	\$ 248.90	\$ 49.00	\$ 847.80
13	Sub-Total for Direct Assigned and Directly Allocated Costs	\$ 10,086.80	\$ 7,794.21	\$ 1,211.25	\$ 1,081.35	\$ 10,086.80
14	Procedural Items Allocated on Overall Allocator					
15	Overall Allocator = Phase Cost/Overall Costs		0.772713818	0.120082200	0.107203983	1
16	Preparation of EECRF Application	\$ 6,740.00	\$ 5,208.09	\$ 809.35	\$ 722.55	\$ 6,740.00
17	Pre-Filing Meetings and Filing of Application	388.52	300.21	46.65	41.65	388.52
18	Procedural Matters	4,321.83	3,339.54	518.97	463.32	4321.83
19	Settlement	5,278.00	4,078.38	633.79	565.82	5278
20	Total Allocated Procedural Item Costs	\$ 16,728.35	\$ 12,926.23	\$ 2,008.78	\$ 1,793.35	\$ 16,728.35
21	Total Costs by Phase	\$ 26,815.15	\$ 20,720.44	\$ 3,220.02	\$ 2,874.69	\$ 26,815.15

Southwestern Public Service Company

Allocation of Requested RCEs Incurred
by SPS in Docket No. 49495 by Phase

Line No	Description of Work Performed	Attorney/Consultant or Employee	Date Incurred	Hours Billed	Rate	Dollars Billed (\$)	Adjustment (\$)	Requested Amount (\$)	Category	Receipt Page Reference	Assigned or Allocated	Requested Amount (\$)
1	Legal											
2	Beggie Wren											
3	Review and analyze 2018 EECRF settlement, stipulation, and supporting materials regarding impact on 2019 filing	Patrick Pearsall	1-Mar-19	1.60	\$ 350.00	\$ 560.00		\$ 560.00	Prep of Application	9	Allocated	\$ 560.00
4	Review and analyze pending EECRF rule revisions and potential impact on 2019 filing	Patrick Pearsall	1-Mar-19	0.70	350.00	245.00		245.00	Prep of Application	9	Allocated	245.00
5	Communicate with S. Wells regarding timing and impact of pending substantive rule changes on 2019 EEPR and EECRF filings	Patrick Pearsall	1-Mar-19	0.20	350.00	70.00		70.00	Prep of Application	9	Allocated	70.00
6	Communicate with client Telephone call with J. Lovelady and litigation team regarding initial review and strategy for EEPR and EECRF	Patrick Pearsall	4-Mar-19	0.60	350.00	210.00		210.00	Prep of Application	9	Allocated	210.00
7	Review and analyze proposed order adopting revisions to EECRF and EEPR substantive rules	Patrick Pearsall	7-Mar-19	0.20	350.00	70.00		70.00	Prep of Application	9	Allocated	70.00
8	Review and analyze draft EEPR	Patrick Pearsall	13-Mar-19	0.50	350.00	175.00		175.00	Prep of Application	10	Allocated	175.00
9	Analyze revisions to EEPR and compare changes from 2018	Patrick Pearsall	14-Mar-19	0.70	350.00	245.00		245.00	Prep of Application	10	Allocated	245.00
10	Communicate with client Telephone call with J. Cunningham, J. Lovelady and litigation team re updates to EEPR	Patrick Pearsall	14-Mar-19	0.80	350.00	280.00		280.00	Prep of Application	10	Allocated	280.00
11	Communicate with J. Cunningham, J. Lovelady, S. Wells, and M. Walker regarding over/under calculation	Patrick Pearsall	14-Mar-19	0.30	350.00	105.00		105.00	Prep of Application	11	Allocated	105.00
12	Review revisions to EECRF and EEPR rules	Patrick Pearsall	14-Mar-19	0.20	350.00	70.00		70.00	Prep of Application	11	Allocated	70.00
13	Communicate with client M. Walker regarding EECRF issues and witness assignments	Patrick Pearsall	15-Mar-19	0.30	350.00	105.00		105.00	Prep of Application	11	Allocated	105.00
14	Review EECRF and cite check updated rule provisions referenced	Stephanie Green	18-Mar-19	1.60	230.00	368.00		368.00	Prep of Application	12	Allocated	368.00
15	Review communication with J. Lovelady regarding updates to and finalization of EEPR	Patrick Pearsall	19-Mar-19	0.20	350.00	70.00		70.00	Prep of Application	12	Allocated	70.00
16	Review and analyze Commission rules and precedent regarding calculation and reporting of demand reduction goals	Patrick Pearsall	20-Mar-19	1.40	350.00	490.00		490.00	Prep of Application	12	Allocated	490.00
17	Review revisions to EEPR and analyze issues regarding calculation of goals	Patrick Pearsall	20-Mar-19	1.70	350.00	595.00		595.00	Prep of Application	12	Allocated	595.00
18	Analysis/Strategy Communicate with client with Telephone call with J. Lovelady regarding EECRF goal calculations	Patrick Pearsall	20-Mar-19	0.80	350.00	280.00		280.00	Prep of Application	12	Allocated	280.00
19	Telephone call with J. Lovelady, M. Walker, J. Cunningham and litigation team regarding draft EEPR	Patrick Pearsall	20-Mar-19	1.00	350.00	350.00		350.00	Prep of Application	13	Allocated	350.00
20	Draft/Revise/Revise draft EEPR	Patrick Pearsall	20-Mar-19	1.10	350.00	385.00		385.00	Prep of Application	13	Allocated	385.00
21	Research Commission precedent regarding implementation and calculation of demand reduction goals	Patrick Pearsall	21-Mar-19	0.50	350.00	175.00		175.00	Prep of Application	13	Allocated	175.00
22	Telephone call with J. Cunningham regarding demand reduction goal calculation	Patrick Pearsall	21-Mar-19	0.20	350.00	70.00		70.00	Prep of Application	13	Allocated	70.00

Southwestern Public Service Company

Allocation of Requested RCEs Incurred
by SPS in Docket No. 49495 by Phase

Line No	Description of Work Performed	Attorney/Consultant or Employee	Date Incurred	Hours Billed	Rate	Dollars Billed (\$)	Adjustment (\$)	Requested Amount (\$)	Category	Receipt Page Reference	Assigned or Allocated	Requested Amount (\$)
23	Communicate with S. Wells regarding revisions to EEPRs	Patrick Pearsall	22-Mar-19	0.20	350.00	70.00		70.00	Prep of Application	13	Allocated	70.00
24	Analyze issues regarding revisions to EEPR	Patrick Pearsall	22-Mar-19	0.40	350.00	140.00		140.00	Prep of Application	13	Allocated	140.00
25	Pleadings	Stephanie Green	27-Mar-19	0.60	230.00	138.00		138.00	Prep of Application	14	Allocated	138.00
26	Review and analyze final version of EEPR	Patrick Pearsall	27-Mar-19	0.90	350.00	315.00		315.00	Prep of Application	14	Allocated	315.00
27	Telephone call with S. Wells regarding EEPR and final revisions	Patrick Pearsall	27-Mar-19	0.20	350.00	70.00		70.00	Prep of Application	14	Allocated	70.00
28	Telephone call with S. Wells regarding finalizing EEPR	Patrick Pearsall	28-Mar-19	0.20	350.00	70.00		70.00	Prep of Application	14	Allocated	70.00
29	Review communication with S. Wells and J. Lovelady regarding revisions to EEPR	Patrick Pearsall	28-Mar-19	0.20	350.00	70.00		70.00	Prep of Application	15	Allocated	70.00
30	Review and analyze final revisions to EEPR	Patrick Pearsall	28-Mar-19	0.20	350.00	70.00		70.00	Prep of Application	15	Allocated	70.00
31	Review and analyze draft application	Patrick Pearsall	10-Apr-19	0.30	350.00	105.00		105.00	Prep of Application	19	Allocated	105.00
32	Review and edit draft application	Patrick Pearsall	11-Apr-19	0.30	350.00	105.00		105.00	Prep of Application	19	Allocated	105.00
33	Review/Analyze and cite check application	Stephanie Green	26-Apr-19	1.20	230.00	276.00		276.00	Prep of Application	21	Allocated	276.00
34	Draft/Revise draft index of confidential documents	Stephanie Green	30-Apr-19	1.10	230.00	253.00		253.00	Prep of Application	22	Allocated	253.00
35	Analyze issues regarding confidential index for application	Patrick Pearsall	30-Apr-19	0.20	350.00	70.00		70.00	Prep of Application	22	Allocated	70.00
36	Review and finalize application	Patrick Pearsall	30-Apr-19	0.20	\$ 350.00	\$ 70.00		\$ 70.00	Prep of Application	22	Allocated	\$ 70.00

Subtotals & Totals

Duggan Wren

37	Patrick Pearsall	Sub-Total	\$ 5,705.00
38	Stephanie Green	Sub-Total	\$ 1,035.00
39		Sub-Total	\$ 6,740.00

Total for Expenses Related to Testimony: \$ 6,740.00

Adjustments to Expenses Related to Testimony: \$ -

Total Requested Expenses Related to Testimony: \$ 6,740.00

Southwestern Public Service Company

Allocation of Requested RCEs Incurred
by SPS in Docket No. 49495 by Phase

Line No	Description of Work Performed	Attorney/Consultant or Employee	Date Incurred	Hours Billed	Rate	Dollars Billed (\$)	Adjustment (\$)	Requested Amount (\$)	Category	Receipt Page Reference	Assigned or Allocated	Requested Amount (\$)
1	Legal											
2	Duggins Wren											
3	Draft engagement letter for S Davis	Patrick Pearsall	22-Feb-19	0.30	\$ 350.00	\$ 105.00		\$ 105.00	Rate Case Expenses	5	Policy	\$ 105.00
4	Communicate with S Wells regarding retention of S Davis to assist with review and defense of rate case expenses	Patrick Pearsall	25-Feb-19	0.20	350.00	70.00		70.00	Rate Case Expenses	5	Policy	70.00
5	Communicate with S Davis regarding status of review of 2018 rate case expenses	Patrick Pearsall	11-Mar-19	0.10	350.00	35.00		35.00	Rate Case Expenses	10	Policy	35.00
7	Review materials supporting 2018 EECRF rate case expenses	Patrick Pearsall	13-Mar-19	0.30	350.00	105.00		105.00	Rate Case Expenses	10	Policy	105.00
8	Telephone calls with S Davis regarding rate case expenses for 2018 EECRF proceeding	Patrick Pearsall	13-Mar-19	0.40	350.00	140.00		140.00	Rate Case Expenses	10	Policy	140.00
9	Telephone call with S Wells regarding documentation of 2018 rate case expenses	Patrick Pearsall	14-Mar-19	0.20	350.00	70.00		70.00	Rate Case Expenses	11	Policy	70.00
10	Communicate with S Davis regarding review of rate case expenses	Patrick Pearsall	14-Mar-19	0.20	350.00	70.00		70.00	Rate Case Expenses	11	Policy	70.00
11	Review rate case expense documentation	Patrick Pearsall	14-Mar-19	0.50	350.00	175.00		175.00	Rate Case Expenses	11	Policy	175.00
12	Communicate with S Wells and S Davis regarding materials supporting request for rate case expenses	Patrick Pearsall	18-Mar-19	0.10	350.00	35.00		35.00	Rate Case Expenses	12	Policy	35.00
13	Telephone call with S Davis regarding affidavit in support rate case expenses	Patrick Pearsall	21-Mar-19	0.30	350.00	105.00		105.00	Rate Case Expenses	13	Policy	105.00
14	Telephone call with S Wells regarding evidence supporting recovery of 2018 EECRF RCEs	Patrick Pearsall	27-Mar-19	0.20	350.00	70.00		70.00	Rate Case Expenses	14	Policy	70.00
15	Telephone call with S Davis regarding affidavit in support of reasonableness of 2018 EECRF RCEs	Patrick Pearsall	29-Mar-19	0.30	350.00	105.00		105.00	Rate Case Expenses	15	Policy	105.00
16	Communicate with client Communicate with S Davis re affidavit in support of reasonableness of rate case expenses	Patrick Pearsall	19-Apr-19	0.20	350.00	70.00		70.00	Rate Case Expenses	17	Policy	70.00
17	Consulting Services with Stephen Davis	S Davis	30-Apr-19	1.00	2,730.00	2,730.00		2,730.00	Rate Case Expenses	25-26	Policy	2,730.00
18	Review and analyze issues regarding S Davis affidavit	Patrick Pearsall	3-Apr-19	0.20	350.00	70.00		70.00	Rate Case Expenses	17	Policy	70.00
19	Review and analyze draft S Davis affidavit in support of rate case expense request	Patrick Pearsall	5-Apr-19	0.60	350.00	210.00		210.00	Rate Case Expenses	17	Policy	210.00
20	Communicate with S Davis regarding affidavit	Patrick Pearsall	5-Apr-19	0.10	\$ 350.00	\$ 35.00		\$ 35.00	Rate Case Expenses	17	Policy	\$ 35.00

Subtotals & Totals

Duggins Wren			
21	Patrick Pearsall	Sub-Total	1,470.00
22		Sub-Total	\$ 1,470.00
Consulting Services			
23	Stephen Davis	Sub-Total	\$ 2,730.00
24		Sub-Total	\$ 2,730.00
25	Total for Expenses Related to the Rate Case Expenses		\$ 4,200.00
26	Adjustments to Expenses Related to the Rate Case Expenses		\$ -
27	Total Requested Expenses Related to the Rate Case Expenses		\$ 4,200.00

Southwestern Public Service Company

Allocation of Requested RCEs Incurred
by SPS in Docket No. 49495 by Phase

Line No.	Description of Work Performed	Attorney/Consultant or Employee	Date Incurred	Hours Billed	Rate	Dollars Billed (\$)	Adjustment (\$)	Requested Amount (\$)	Category	Receipt Page Reference	Assigned or Allocated	Requested Amount (\$)
1	Legal											
2	Duggins Wren											
3	Communicate with S. Wells regarding witness assignments.	Patrick Pearsall	1-Apr-19	0.20	\$ 350.00	\$ 70.00		\$ 70.00	Testimony	17	Allocated Direct	\$ 70.00
4	Communicate with S. Wells regarding D. Shockley draft testimony	Patrick Pearsall	2-Apr-19	0.10	350.00	35.00		35.00	Testimony	17	Program	35.00
5	Communications with S. Wells regarding over-under calculation and program costs	Patrick Pearsall	4-Jun-19	0.20	350.00	70.00		70.00	Testimony	45		
											Policy	70.00
6	Review and analyze issues regarding D. Shockley direct testimony	Patrick Pearsall	7-Apr-19	1.30	350.00	455.00		455.00	Testimony	18	Program	455.00
7	Review/Analyze and cite check Lovelady direct testimony	Stephanie Green	8-Apr-19	3.80	230.00	874.00		874.00	Testimony	18	Policy	874.00
8	Review and analyze issues regarding J. Lovelady direct testimony	Patrick Pearsall	8-Apr-19	2.60	350.00	910.00		910.00	Testimony	18	Policy	910.00
9	Communicate with S. Wells regarding J. Lovelady direct testimony	Patrick Pearsall	8-Apr-19	0.20	350.00	70.00		70.00	Testimony	18	Policy	70.00
10	Telephone call with J. Lovelady and litigation team regarding review of draft testimony	Patrick Pearsall	9-Apr-19	0.90	350.00	315.00		315.00	Testimony	18	Policy	315.00
11	Review and analyze issues regarding J. Lovelady testimony.	Patrick Pearsall	9-Apr-19	0.50	350.00	175.00		175.00	Testimony	18	Policy	175.00
12	Review and analyze issues regarding J. Smith testimony	Patrick Pearsall	10-Apr-19	1.60	350.00	560.00		560.00	Testimony	19	CARD	560.00
13	Telephone call with J. Smith, S. Wells, J. Cunningham and litigation team regarding cost allocation testimony	Patrick Pearsall	10-Apr-19	0.60	350.00	210.00		210.00	testimony	19	CARD	210.00
14	Review revisions to J. Lovelady direct testimony	Patrick Pearsall	19-Apr-19	0.30	350.00	105.00		105.00	Testimony	20	Policy	105.00
15	Review and analyze issues regarding draft D. Shockley direct testimony	Patrick Pearsall	21-Apr-19	0.60	350.00	210.00		210.00	Testimony	20	Program	210.00
16	Telephone call with J. Lovelady, D. Shockley, S. Wells, and J. Cunningham regarding final revisions to D. Shockley direct testimony	Patrick Pearsall	22-Apr-19	0.20	350.00	70.00		70.00	Testimony	20	Program	70.00
17	Telephone call with J. Lovelady, J. Cunningham, S. Wells, and M. Walker regarding review of J. Lovelady direct testimony	Patrick Pearsall	23-Apr-19	0.50	350.00	175.00		175.00	Testimony	20	Policy	175.00
18	Review and analyze issues regarding revisions to J. Lovelady direct testimony	Patrick Pearsall	23-Apr-19	0.30	350.00	105.00		105.00	Testimony	21	Policy	105.00
19	Analyze revisions to J. Lovelady direct testimony	Patrick Pearsall	24-Apr-19	0.40	350.00	140.00		140.00	Testimony	21	Policy	140.00
20	Analyze revisions to J. Smith direct testimony.	Patrick Pearsall	25-Apr-19	0.30	350.00	105.00		105.00	Testimony	21	CARD	105.00
21	Telephone call with J. Smith regarding final revisions to direct testimony	Patrick Pearsall	25-Apr-19	0.30	350.00	105.00		105.00	Testimony	21	CARD	105.00
24	Communicate with J. Smith regarding cost cap calculations.	Patrick Pearsall	11-Apr-19	0.10	350.00	35.00		35.00	Testimony	19	CARD	35.00
25	Telephone call with J. Lovelady, J. Cunningham and litigation team regarding amended EEPR	Patrick Pearsall	17-Apr-19	0.30	350.00	105.00		105.00	Testimony	19	Program	105.00
26	Review revisions to amended EEPR	Patrick Pearsall	17-Apr-19	0.20	350.00	70.00		70.00	Testimony	20	Program	70.00
27	Analyze issues regarding AIP.	Patrick Pearsall	25-Apr-19	0.20	\$ 350.00	\$ 70.00		\$ 70.00	Testimony	21	Policy	\$ 70.00

Subtotals & Totals

28	Patrick Pearsall	Sub-Total	4,165.00
29	Stephanie Green	Sub-Total	\$ 874.00
30		Sub-Total:	\$ 5,039.00
31		Total for Expenses Related to Testimony:	\$ 5,039.00
32		Adjustments to Expenses Related to Testimony:	\$ -
33		Total Requested Expenses Related to Testimony:	\$ 5,039.00

Southwestern Public Service Company

Allocation of Requested RCEs Incurred
by SPS in Docket No. 49495 by Phase

Line No.	Description of Work Performed	Attorney/Consultant or Employee	Date Incurred	Hours Billed	Rate	Dollars Billed (\$)	Adjustment (\$)	Requested Amount (\$)	Category	Receipt Page Reference	Assigned or Allocated	Requested Amount (\$)
1	Employee Expenses											
2	Dee Hooley											
3	Postage	Dee Hooley	30-Apr-19			\$ 11.85	-	\$ 11.85	Filing	28	Allocated	\$ 11.85
4	Postage	Dee Hooley	30-Apr-19			26.83		26.83	Filing	28	Allocated	26.83
5	Postage	Dee Hooley	1-May-19		-	7.25		7.25	Filing	32	Allocated	7.25
6	Postage	Dee Hooley	1-May-19		-	7.25		7.25	Filing	32	Allocated	7.25
7	Postage	Dee Hooley	1-May-19		-	7.25		7.25	Filing	32	Allocated	7.25
8	Postage	Dee Hooley	1-May-19		-	5.99		5.99	Filing	32	Allocated	5.99
9	Postage	Dee Hooley	1-May-19		-	7.25		7.25	Filing	32	Allocated	7.25
10	Postage	Dee Hooley	1-May-19		-	7.25		7.25	Filing	32	Allocated	7.25
11	Postage	Dee Hooley	1-May-19		-	7.25		7.25	Filing	32	Allocated	7.25
12	Postage	Dee Hooley	1-May-19		-	10.32		10.32	Filing	32	Allocated	10.32
13	Postage	Dee Hooley	1-May-19		-	7.25		7.25	Filing	32	Allocated	7.25
14	Postage	Dee Hooley	1-May-19		-	7.25		7.25	Filing	32	Allocated	7.25
15	Postage	Dee Hooley	1-May-19		-	\$ 7.53		\$ 7.53	Filing	32	Allocated	\$ 7.53
16												
17	Legal											
18	Duggins Wren											
19	Analyze and revise index of documents.	Stephanie Green	1-May-19	0.10	\$ 230.00	\$ 23.00		\$ 23.00	Filing	37	Allocated	\$ 23.00
20	Multiple communications with S. Wells regarding case filing of application, testimony, and amended EEPR	Patrick Pearsall	1-May-19	0.40	350.00	140.00		140.00	Filing	37	Allocated	140.00
21	Review and edit draft confidential index	Patrick Pearsall	1-May-19	0.20	350.00	70.00		70.00	Filing	37	Allocated	70.00
22	Communicate with S. Wells regarding finalizing and filing application, testimony, and confidential index.	Patrick Pearsall	30-Apr-19	0.10	\$ 350.00	\$ 35.00		\$ 35.00	Filing	23	Allocated	\$ 35.00

Subtotals & Totals

Duggins Wren		
23	Patrick Pearsall	Sub-Total 245.00
24	Stephanie Green	Sub-Total \$ 23.00
		Sub-Total: \$ 268.00

Employee Expenses		
25	Postage	Sub-Total \$ 120.52
26		Sub-Total: \$ 120.52

27 Total for Expenses Related to Pre-Filing and Filing: \$ 388.52

28 Adjustments to Expenses Related to Pre-Filing and Filing: \$ -

29 Total Requested Expenses Related to Pre-Filing and Filing: \$ 388.52

Southwestern Public Service Company

Allocation of Requested RCEs Incurred
by SPS in Docket No. 49495 by Phase

Line No	Description of Work Performed	Attorney/Consultant or Employee	Date Incurred	Hours Billed	Rate	Dollars Billed (\$)	Adjustment (\$)	Requested Amount (\$)	Category	Receipt Page Reference	Assigned or Allocated	Requested Amount (\$)
1	Legal											
2	Douglas Wren											
3	Review and analyze Order of Referral and issues regarding scope and strategy of proposed list of issues	Patrick Pearsall	3-May-19	0.30	\$ 350.00	\$ 105.00		\$ 105.00	Procedural Matters	37	Allocated	\$ 105.00
4	Pleadings Draft/Revise proposed list of issues	Stephanie Green	6-May-19	1.80	230.00	414.00		414.00	Procedural Matters	37	Allocated	414.00
5	Pleadings Review/Analyze issues re proposed list of issues	Patrick Pearsall	7-May-19	0.30	350.00	105.00		105.00	Procedural Matters	37	Allocated	105.00
6	Communicate with J. Cunningham, S. Wells, and M. Walker regarding list of issues	Patrick Pearsall	7-May-19	0.20	350.00	70.00		70.00	Procedural Matters	38	Allocated	70.00
7	Review and edit draft proposed list of issues	Patrick Pearsall	9-May-19	0.20	350.00	70.00		70.00	Procedural Matters	38	Allocated	70.00
8	Review and analyze Staff's motion to extend deadline for filing list of issues	Patrick Pearsall	9-May-19	0.10	350.00	35.00		35.00	Procedural Matters	38	Allocated	35.00
9	Communicate with S. Wells and M. Walker regarding list of issues	Patrick Pearsall	9-May-19	0.20	350.00	70.00		70.00	Procedural Matters	38	Allocated	70.00
10	Review and finalize proposed list of issues for filing	Patrick Pearsall	10-May-19	0.20	350.00	70.00		70.00	Procedural Matters	38	Allocated	70.00
11	Review and analyze Staff motion to extend deadline for submitting proposed list of issues	Patrick Pearsall	10-May-19	0.20	350.00	70.00		70.00	Procedural Matters	38	Allocated	70.00
12	Communicate with S. Wells re filing proof of notice	Patrick Pearsall	13-May-19	0.10	350.00	35.00		35.00	Procedural Matters	39	Allocated	35.00
13	Review Staff's proposed list of issues and proposed preliminary order	Patrick Pearsall	15-May-19	0.10	350.00	35.00		35.00	Procedural Matters	39	Allocated	35.00
14	Analyze and compare proposed issues against Staff's	Stephanie Green	15-May-19	0.50	230.00	115.00		115.00	Procedural Matters	39	Allocated	115.00
15	Review SOAH Order No. 1 and analyze issues regarding procedural schedule	Patrick Pearsall	16-May-19	0.20	350.00	70.00		70.00	Procedural Matters	39	Allocated	70.00
16	Communicate with M. Walker, J. Cunningham, and S. Wells regarding SOAH Order No. 1 and draft preliminary order	Patrick Pearsall	16-May-19	0.20	350.00	70.00		70.00	Procedural Matters	39	Allocated	70.00
17	Analyze results of proposed issue comparison	Stephanie Green	16-May-19	0.10	230.00	23.00		23.00	Procedural Matters	39	Allocated	23.00
18	Analyze issues regarding procedural schedule	Patrick Pearsall	20-May-19	0.30	350.00	105.00		105.00	Procedural Matters	40	Allocated	105.00
19	Review Staff's request for a hearing	Patrick Pearsall	20-May-19	0.10	350.00	35.00		35.00	Procedural Matters	40	Allocated	35.00
20	Revise proposed procedural schedule	Stephanie Green	20-May-19	2.30	230.00	529.00		529.00	Procedural Matters	40	Allocated	529.00
21	Communicate with S. Wells regarding issues with procedural schedule	Patrick Pearsall	21-May-19	0.30	350.00	105.00		105.00	Procedural Matters	40	Allocated	105.00
22	Review/Analyze proposed schedule timing issues	Stephanie Green	21-May-19	0.10	230.00	23.00		23.00	Procedural Matters	41	Allocated	23.00
23	Review revised draft preliminary order	Patrick Pearsall	22-May-19	0.10	350.00	35.00		35.00	Procedural Matters	41	Allocated	35.00
24	Communicate with M. Walker and S. Wells re procedural schedule	Patrick Pearsall	24-May-19	0.20	350.00	70.00		70.00	Procedural Matters	41	Allocated	70.00
25	Communicate with Staff and TIEC counsel regarding issues with procedural schedule	Patrick Pearsall	28-May-19	0.10	350.00	35.00		35.00	Procedural Matters	42	Allocated	35.00
26	Review and analyze Staff's recommendations on a Sufficiency of the application and notice	Patrick Pearsall	29-May-19	0.20	350.00	70.00		70.00	Procedural Matters	42	Allocated	70.00
27	Telephone call with TIEC counsel J. Zhu regarding issues with procedural schedule	Patrick Pearsall	31-May-19	0.20	350.00	70.00		70.00	Procedural Matters	42	Allocated	70.00
28	Communicate with Staff counsel R. Nemer re procedural schedule	Patrick Pearsall	4-Jun-19	0.20	350.00	70.00		70.00	Procedural Matters	45	Allocated	70.00
29	Communicate with Staff counsel R. Nemer and TIEC counsel J. Zhu regarding procedural schedule	Patrick Pearsall	5-Jun-19	0.20	350.00	70.00		70.00	Procedural Matters	45	Allocated	70.00
30	Analyze issues regarding procedural schedule	Patrick Pearsall	5-Jun-19	0.20	350.00	70.00		70.00	Procedural Matters	45	Allocated	70.00
31	Communicate with M. Walker, J. Cunningham, and S. Wells regarding procedural schedule issues	Patrick Pearsall	5-Jun-19	0.30	350.00	105.00		105.00	Procedural Matters	45	Allocated	105.00
32	Communications with S. Wells and M. Walker regarding procedural schedule	Patrick Pearsall	6-Jun-19	0.30	350.00	105.00		105.00	Procedural Matters	46	Allocated	105.00
33	Communications with Staff and TIEC regarding procedural schedule	Patrick Pearsall	6-Jun-19	0.20	350.00	70.00		70.00	Procedural Matters	46	Allocated	70.00

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34	Communicate with S. Wells, J. Cunningham and M. Walker regarding procedural schedule	Patrick Pearsall	7-Jun-19	0.30	350.00	105.00		105.00	Procedural Matters	46	Allocated	105.00
35	Finalize agreed procedural schedule for filing	Patrick Pearsall	7-Jun-19	0.20	350.00	70.00		70.00	Procedural Matters	46	Allocated	70.00
36	Communicate with Staff and TIEC counsel regarding agreed procedural schedule	Patrick Pearsall	7-Jun-19	0.20	350.00	70.00		70.00	Procedural Matters	46	Allocated	70.00
37	Communicate with parties regarding motion to cancel prehearing conference	Patrick Pearsall	10-Jun-19	0.20	350.00	70.00		70.00	Procedural Matters	46	Allocated	70.00
38	Communicate with S. Wells regarding scope of notice and service of filing	Patrick Pearsall	29-Apr-19	0.20	350.00	70.00		70.00	Procedural Matters	22	Allocated	70.00
39	Analyze issues regarding scope of notice of application	Patrick Pearsall	29-Apr-19	0.20	350.00	70.00		70.00	Procedural Matters	22	Allocated	70.00
40	Research procedural issues regarding notice of application	Stephanie Green	29-Apr-19	0.30	230.00	69.00		69.00	Procedural Matters	22	Allocated	69.00
41	Communicate with Staff counsel R. Nemer regarding status of filing of clean copy of EECRF tariff	Patrick Pearsall	24-Oct-19	0.20	350.00	70.00		70.00	Procedural Matters	82	Allocated	70.00
42	Communicate with S. Wells re timing of filing clean copy of approved EECRF tariff	Patrick Pearsall	24-Oct-19	0.10	350.00	35.00		35.00	Procedural Matters	82	Allocated	35.00
43	Communicate with S. Wells re status of filing clean copy of approved EECRF tariff	Patrick Pearsall	25-Oct-19	0.10	350.00	35.00		35.00	Procedural Matters	82	Allocated	35.00
44	Communicate with D. Hooley re filing of clean tariff	Patrick Pearsall	29-Oct-19	0.10	350.00	35.00		35.00	Procedural Matters	82	Allocated	35.00
45	Communicate with Staff counsel R. Nemer re company's filing of clean tariff in accordance with final order	Patrick Pearsall	29-Oct-19	0.10	350.00	35.00		35.00	Procedural Matters	82	Allocated	35.00
46	Legal Expenses											
47	Deliveries From											
48	Delivery Services/Messengers Delivery Service from Public Utility Commission of TX/ clean copy of tariff	Courier Charges	29-Oct-19	1.00	8.00	8.00		8.00	Procedural Matters	86	Allocated	8.00
49	Delivery Services/Messengers Delivery Service to Public Utility Commission of TX/ clean copy of tariff	Courier Charges	29-Oct-19	1.00	8.00	8.00		8.00	Procedural Matters	86	Allocated	8.00
50	Delivery Services/Messengers Delivery Service to Herrera Law & Associates, PLLC	Courier Charges	1-May-19	1.00	8.00	8.00		8.00	Procedural Matters	51	Allocated	8.00
51	Delivery Services/Messengers Delivery Service from Public Utility Commission of TX	Courier Charges	1-May-19	1.00	12.00	12.00		12.00	Procedural Matters	51	Allocated	12.00
52	Delivery Services/Messengers Delivery Service from Public Utility Commission of TX	Courier Charges	1-May-19	1.00	21.38	21.38		21.38	Procedural Matters	51	Allocated	21.38
53	Delivery Services/Messengers Delivery Service to Public Utility Commission of TX	Courier Charges	1-May-19	1.00	12.00	12.00		12.00	Procedural Matters	51	Allocated	12.00
54	Delivery Services/Messengers Delivery Service to Public Utility Commission of TX	Courier Charges	1-May-19	1.00	25.01	25.01		25.01	Procedural Matters	51	Allocated	25.01
55	Delivery Services/Messengers Delivery Service to Office of the Public Utility Counsel	Courier Charges	1-May-19	1.00	8.00	8.00		8.00	Procedural Matters	51	Allocated	8.00
56	Delivery Services/Messengers Delivery Service to Office of the Public Utility Counsel	Courier Charges	10-May-19	1.00	6.00	6.00		6.00	Procedural Matters	52	Allocated	6.00
57	Delivery Services/Messengers Delivery Service to Office of the Public Utility Counsel	Courier Charges	10-May-19	1.00	6.00	6.00		6.00	Procedural Matters	52	Allocated	6.00
58	Delivery Services/Messengers Delivery Service to Office of the Public Utility Counsel	Courier Charges	14-May-19	1.00	10	10		10.00	Procedural Matters	53	Allocated	10.00
59	Delivery Services/Messengers Delivery Service to Office of the Public Utility Counsel	Courier Charges	14-May-19	1.00	12.00	12.00		12.00	Procedural Matters	54	Allocated	12.00

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60	Delivery Services/Messengers Delivery Service to Public Utility Commission of TX	Courier Charges	6-Jun-19	1 00	12 00	12 00		12 00	Procedural Matters	54	Allocated	12.00
61	Delivery Services/Messengers Delivery Service to Public Utility Commission of TX	Courier Charges	6-Jun-19	1 00	12 00	12 00		12 00	Procedural Matters	54	Allocated	12.00
62	Delivery Services/Messengers Delivery Service to Public Utility Commission of TX	Courier Charges	7-Jun-19	1 00	12 00	12 00		12 00	Procedural Matters	54	Allocated	12.00
63	Delivery Services/Messengers Delivery Service to Public Utility Commission of TX	Courier Charges	7-Jun-19	1 00	12 00	12 00		12 00	Procedural Matters	54	Allocated	12.00
64	Delivery Services/Messengers Delivery Service to Public Utility Commission of TX	Courier Charges	10-Jun-19	1 00	12 00	12 00		12 00	Procedural Matters	54	Allocated	12.00
65	Delivery Services/Messengers Delivery Service to Public Utility Commission of TX	Courier Charges	10-Jun-19	1 00	12 00	12 00		12 00	Procedural Matters	54	Allocated	12.00
66	Litigation Support Vendors Court Reporter Services - Cancelled hearing charge	Courier Charges	19-Jun-19	1 00	235 00	235 00		235 00	Procedural Matters	55	Allocated	235.00
67	Postage	Postage	28-Jun-19	1 00	1 60	1 60		1 60	Procedural Matters		Allocated	1.60
68	Delivery Services/Messengers Delivery Service to Public Utility Commission of TX	Courier Charges	10-Jun-19	1 00	12 00	12 00		12 00	Procedural Matters	54	Allocated	12.00
69	Delivery Services/Messengers Delivery Service to Public Utility Commission of TX	Courier Charges	10-Jun-19	1 00	12 00	12 00		12 00	Procedural Matters	54	Allocated	12.00
70	Delivery Services/Messengers Delivery Service to Public Utility Commission of TX	Courier Charges	9-Jul-19	1 00	8 00	8 00		8 00	Procedural Matters	75	Allocated	8.00
71	Delivery Services/Messengers Delivery Service from Public Utility Commission of TX	Courier Charges	7/9/2019	1 00	8 00	8 00		8 00	Procedural Matters	75	Allocated	8.00
72	Postage	Postage	16-Jul-19	1 00	0 50	0 50		0 50	Procedural Matters		Allocated	0.50
73	Delivery Services/Messengers Delivery Service to Public Utility Commission of TX	Courier Charges	31-Jul-19	1 00	12 00	12 00		12 00	Procedural Matters	74	Allocated	12.00
74	Delivery Services/Messengers Delivery Service from Public Utility Commission of TX	Courier Charges	31-Jul-19	1 00	12 00	12 00		12 00	Procedural Matters	74	Allocated	12.00
75	Photocopies - B&W - Amended EEPR	Photocopy	8-Aug-19	775 00	0 01	7 75		7 75	Procedural Matters		Allocated	7.75
76	Delivery Services/Messengers Delivery Service to Public Utility Commission of TX	Courier Charges	8-Aug-19	1 00	8 00	8 00		8 00	Procedural Matters	74	Allocated	8.00
77	Delivery Services/Messengers Delivery Service from Public Utility Commission of TX	Courier Charges	30-Aug-19	1 00	8 00	8 00		8 00	Procedural Matters	74	Allocated	8.00
78	Delivery Services/Messengers Delivery Service from Public Utility Commission of TX	Courier Charges	5-Sep-19	1 00		12 00		12 00	Procedural Matters	85	Allocated	12.00
79	Delivery Services/Messengers Delivery Service to Public Utility Commission of TX	Courier Charges	5-Sep-19	1 00		12 00		12 00	Procedural Matters	85	Allocated	12.00

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80	Miscellaneous											
81	Internal Processing Fees											
82	Internal Processing Service Fee	Service Fee				0.72		0.72	Procedural Matters	N/A	Allocated	0.72
83	Internal Processing Service Fee	Service Fee				48.15		48.15	Procedural Matters	N/A	Allocated	48.15
84	Internal Processing Service Fee	Service Fee				29.07		29.07	Procedural Matters	N/A	Allocated	29.07
85	Internal Processing Service Fee	Service Fee				27.33		27.33	Procedural Matters	N/A	Allocated	27.33
86	Internal Processing Service Fee	Service Fee				1.32		1.32	Procedural Matters	N/A	Allocated	1.32

Subtotals & Totals

Duggins Wren				
87	Patrick Pearsall	Sub-Total		2,485.00
88	Stephanie Green	Sub-Total		1,173.00
89	Legal Expenses	Sub-Total	\$	557.24
		Sub-Total	\$	4,215.24
Service Fees				
90	Internal Processing Service Fee	Sub-Total	\$	106.59
91		Sub-Total	\$	106.59
92	Total for Expenses Related to Procedural Matters:		\$	4,321.83
93	Adjustments to Expenses Related to Procedural Matters		\$	-
94	Total Requested Expenses Related to Procedural Matters		\$	4,321.83

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1	Employee Expenses											
2	Dee Hooley											
3	Postage	Dee Hooley	27-Jun-19			7.80		7.80	Discovery	58	Staff 02	7.80
4	Legal											
5	Duggins Wren											
6	Review and analyze Staff's 1st set of RFIs	Patrick Pearsall	17-May-19	0.10	350.00	35.00		35.00	Discovery	40	Staff 01	35.00
7	Communicate with S Wells regarding Staff's 1st set of RFIs	Patrick Pearsall	17-May-19	0.10	350.00	35.00		35.00	Discovery	40	Staff 01	35.00
8	Review and edit draft responses to Staff's 1st set of RFIs	Patrick Pearsall	27-May-19	0.30	350.00	105.00		105.00	Discovery	41	Staff 01	105.00
9	Telephone call with S Wells, M. Walker, J. Lovelady and litigation team regarding Staff's 1st set of RFIs.	Patrick Pearsall	28-May-19	0.30	350.00	105.00		105.00	Discovery	41	Staff 01	105.00
10	Review and edit draft responses to Staff's 1st set of RFIs	Patrick Pearsall	28-May-19	0.20	350.00	70.00		70.00	Discovery	41	Staff 01	70.00
11	Analyze issues regarding Staff's 2nd set of RFIs	Patrick Pearsall	13-Jun-19	0.10	350.00	35.00		35.00	Discovery	47	Staff 02	35.00
12	Communicate with J Cunningham regarding Staff's 2nd set of RFIs	Patrick Pearsall	13-Jun-19	0.10	350.00	35.00		35.00	Discovery	47	Staff 02	35.00
13	Review responses to Staff's 2nd set of RFIs	Patrick Pearsall	21-Jun-19	0.30	350.00	105.00		105.00	Discovery	47	Staff 02	105.00
14	Communicate with J Cunningham and S Wells regarding finalizing responses to Staff's 2nd set of RFIs	Patrick Pearsall	27-Jun-19	0.20	350.00	70.00		70.00	Discovery	48	Staff 02	70.00
15	Draft protective order statement and index of voluminous documents.	Patrick Pearsall	28-Jun-19	0.70	350.00	245.00		245.00	Discovery	48	Staff 02	245.00

Subtotals & Totals

16	Duggins Wren											
17	Patrick Pearsall	Sub-Total				840.00						
		Sub-Total				\$ 840.00						
18	Employee Expenses											
19	Dee Hooley	Sub-Total				\$ 7.80						
		Sub-Total				\$ 7.80						
20	Total for Expenses Related to Procedural Matters:					\$ 847.80						
21	Adjustments to Expenses Related to Procedural Matters:					\$ -						
22	Total Requested Expenses Related to Procedural Matters:					\$ 847.80						

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1	Legal											
2	Douglas Wren											
3	Settlement/Non-binding ADR Communicate with client Communicate with S Wells re settlement conference strategy	Patrick Pearsall	19-Jun-19	0 20	350 00	70 00		70 00	Settlement	47	Allocated	70.00
4	Analysis/Strategy Plan and prepare for Prepare evidence and proposed order for submission to OPDM in accordance with SOAH Order No 5	Patrick Pearsall	8-Aug-19	0 20	350 00	70 00		70 00	Settlement	71	Allocated	70 00
5	Analysis/Strategy Communicate with client Communicate with S Wells regarding filing of EEPR	Patrick Pearsall	8-Aug-19	0 10	350 00	35 00		35 00	Settlement	71	Allocated	35.00
6	Settlement/Non-binding ADR Communicate with other external Communicate with Staff counsel R Nemer regarding settlement conference	Patrick Pearsall	21-Jun-19	0 10	350 00	35 00		35 00	Settlement	47	Allocated	35.00
7	Settlement/Non-binding ADR Communicate with client Communicate with S Wells regarding issues with settlement term sheet	Patrick Pearsall	26-Jun-19	0 20	350 00	70 00		70 00	Settlement	47	Allocated	70.00
8	Settlement/Non-binding ADR Draft/Revise settlement term sheet	Patrick Pearsall	27-Jun-19	0 20	350 00	70 00		70 00	Settlement	48	Allocated	70.00
9	Settlement/Non-binding ADR Communicate with other external Communicate with Staff counsel R Nemer regarding Staff issues with term sheet	Patrick Pearsall	28-Jun-19	0 20	350 00	70 00		70 00	Settlement	48	Allocated	70.00
10	Settlement/Non-binding ADR Communicate with client Communicate with S Wells and J Cunningham regarding response to Staff's questions on term sheet	Patrick Pearsall	28-Jun-19	0 20	350 00	70 00		70 00	Settlement	48	Allocated	70 00
11	Settlement/Non-binding ADR Communicate with other external Telephone settlement conference with parties	Patrick Pearsall	1-Jul-19	0 30	350 00	105 00		105 00	Settlement	63	Allocated	105 00
12	Settlement/Non-binding ADR Review/Analyze Analyze issues regarding preparation of settlement documents	Patrick Pearsall	1-Jul-19	0 30	350 00	105 00		105 00	Settlement	63	Allocated	105.00
13	Settlement/Non-binding ADR Communicate with client Communicate with J Cunningham, M Walker and S Wells regarding settlement conference	Patrick Pearsall	1-Jul-19	0 20	350 00	70 00		70 00	Settlement	63	Allocated	70.00
14	Settlement/Non-binding ADR Review/Analyze information regarding settlement	Stephanie Green	2-Jul-19	0 20	230 00	46 00		46 00	Settlement	63	Allocated	46.00
15	Other Written Motions and Submissions Draft/Revise motion to suspend procedural schedule	Stephanie Green	5-Jul-19	0 40	230 00	92 00		92 00	Settlement	63	Allocated	92.00
16	Pleadings Draft/Revise Review and edit draft motion to suspend procedural schedule	Patrick Pearsall	5-Jul-19	0 20	350 00	70 00		70 00	Settlement	64	Allocated	70.00
17	Settlement/Non-binding ADR Plan and prepare for and coordinate drafts of settlement documents	Stephanie Green	8-Jul-19	0 10	230 00	23 00		23 00	Settlement	64	Allocated	23.00
18	Pleadings Communicate with client Communicate with S Wells, M Walker, and J Cunningham regarding motion to suspend	Patrick Pearsall	8-Jul-19	0 10	350 00	35 00		35 00	Settlement	64	Allocated	35 00

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19	Pleadings Communicate with other external Communicate with Staff and TTEC counsel regarding motion to suspend	Patrick Pearsall	8-Jul-19	0 10	350 00	35 00		35 00	Settlement	64	Allocated	35.00
20	Settlement/Non-binding ADR Review/Analyze Analyze issues re preparation of settlement documents	Patrick Pearsall	8-Jul-19	0 20	350 00	70 00		70 00	Settlement	64	Allocated	70.00
21	Settlement/Non-binding ADR Review/Analyze prior docket stipulation package	Stephanie Green	9-Jul-19	0 20	230 00	46 00		46 00	Settlement	64	Allocated	46.00
22	Settlement/Non-binding ADR Draft/Revise settlement documents	Stephanie Green	10-Jul-19	2 40	230 00	552 00		552 00	Settlement	65	Allocated	552.00
23	Settlement/Non-binding ADR Draft/Revise proposed order and confirm cites and referenced figures	Stephanie Green	11-Jul-19	1 70	230 00	391 00		391 00	Settlement	65	Allocated	391.00
24	Settlement/Non-binding ADR Draft/Revise motion to admit evidence and remand	Stephanie Green	11-Jul-19	0 60	230 00	138 00		138 00	Settlement	65	Allocated	138.00
25	Settlement/Non-binding ADR Communicate with client regarding draft settlement documents for review	Stephanie Green	11-Jul-19	0 20	230 00	46 00		46 00	Settlement	65	Allocated	46 00
26	Settlement/Non-binding ADR Draft/Revise Review and edit draft stipulation and attachments, and motion to remand	Patrick Pearsall	15-Jul-19	1 30	350 00	455 00		455 00	Settlement	65	Allocated	455.00
27	Settlement/Non-binding ADR Review/Analyze communication regarding settlement	Stephanie Green	16-Jul-19	0 10	230 00	23 00		23 00	Settlement	65	Allocated	23.00
28	Settlement/Non-binding ADR Communicate with client Communicate with S Wells, M Walker, and J Cunningham regarding draft settlement documents	Patrick Pearsall	16-Jul-19	0 20	350 00	70 00		70 00	Settlement	66	Allocated	70.00
29	Settlement/Non-binding ADR Review/Analyze documents and analyze issues regarding conforming proposed order to Commission Staff's recommendation	Stephanie Green	17-Jul-19	1 80	230 00	414 00		414 00	Settlement	66	Allocated	414 00
30	Settlement/Non-binding ADR Draft/Revise proposed order to incorporation Staff revisions	Stephanie Green	19-Jul-19	2 50	230 00	575 00		575 00	Settlement	66	Allocated	575 00
31	Pleadings Draft/Revise Review and edit draft proposed order	Patrick Pearsall	22-Jul-10	0 60	350 00	210 00		210 00	Settlement	66	Allocated	210.00
32	Settlement/Non-binding ADR Review/Analyze updated draft settlement documents and correspondence regarding status of case	Stephanie Green	23-Jul-19	0 20	230 00	46 00		46 00	Settlement	66	Allocated	46.00

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33	Settlement/Non-binding ADR Review/Analyze Review and analyze Staff's proposed edits to settlement documents	Patrick Pearsall	26-Jul-19	0 20	350 00	70 00		70 00	Settlement	66	Allocated	70.00
34	Settlement/Non-binding ADR Communicate with other external Telephone call with Staff counsel regarding bases for revisions to settlement documents	Patrick Pearsall	26-Jul-19	0 20	350 00	70 00		70 00	Settlement	67	Allocated	70.00
35	Settlement/Non-binding ADR Review/Analyze and revise settlement documents and incorporate Staff and TIEC edits	Patrick Pearsall	29-Jul-19	1 10	230 00	253 00		253 00	Settlement	67	Allocated	253 00
36	Settlement/Non-binding ADR Communicate with other external Staff and TIEC counsel regarding finalizing and filing settlement documents	Patrick Pearsall	29-Jul-19	0 20	350 00	70 00		70 00	Settlement	67	Allocated	70.00
37	Analysis/Strategy Review/Analyze Staff affidavits and verify cited information	Stephanie Green	30-Jul-19	0 80	230 00	184 00		184 00	Settlement	67	Allocated	184.00
38	Settlement/Non-binding ADR Review/Analyze Review and analyze Staff's affidavits in support of stipulation	Patrick Pearsall	30-Jul-19	0 20	350 00	70 00		70 00	Settlement	67	Allocated	70.00
39	Analysis/Strategy Review/Analyze correspondence to ALJ regarding filing	Stephanie Green	31-Jul-19	0 10	230 00	23 00		23 00	Settlement	67	Allocated	23.00
40	Correspondence to ALJ regarding filing	Patrick Pearsall	31-Jul-19	0 20	350 00	70 00		70 00	Settlement	68	Allocated	70.00
41	Settlement/Non-binding ADR Communicate with other external Telephone call with H. Armstrong regarding Staff request that SPS supplement record with EEPR workpapers	Patrick Pearsall	4-Sep-19	0 10	350 00	35 00		35 00	Settlement	79	Allocated	35.00
42	Settlement/Non-binding ADR Communicate with client Communicate with S. Wells re Staff request that Company supplement record with native EEPR workpapers	Patrick Pearsall	4-Sep-19	0 10	350 00	35 00		35 00	Settlement	79	Allocated	35.00
43	Pleadings Draft/Revise Draft pleading to support filing of supplemental materials	Patrick Pearsall	5-Sep-19	0 10	350 00	35 00		35 00	Settlement	79	Allocated	35.00
44	Written Motions and Submissions Review/Analyze and compare SPS proposed order with OPDM and provide comments re same	Stephanie Green	9-Sep-19	0 20	230 00	46 00		46 00	Settlement	79	Allocated	46.00

Southwestern Public Service Company

Allocation of Requested RCEs Incurred
by SPS in Docket No. 49495 by Phase

Line No.	Description of Work Performed	Attorney/Consultant or Employee	Date Incurred	Hours Billed	Rate	Dollars Billed (\$)	Adjustment (\$)	Requested Amount (\$)	Category	Receipt Page Reference	Assigned or Allocated	Requested Amount (\$)
45	Post-Trial Motions and Submissions Review/Analyze Review OPDM-issued proposed order and analyze issues regarding necessity of corrections	Patrick Pearsall	9-Sep-19	0.30	350.00	105.00		105.00	Settlement	79	Allocated	105.00
46	Analysis/Strategy Review/Analyze Review and analyze Chairman Walker memo regarding revisions to OPDM proposed final order	Patrick Pearsall	25-Sep-19	0.20	350.00	70.00		70.00	Settlement	80	Allocated	70.00
47	Analysis/Strategy Communicate with client Communicate with M Walker regarding Chairman Walker memo	Patrick Pearsall	25-Sep-19	0.10	350.00	35.00		35.00	Settlement	80	Allocated	35.00

Subtotals & Totals

	DWMR		
48	Patrick Pearsall	Sub-Total	2,633.00
49	Stephanie Green	Sub-Total	2,645.00
50			5,278.00
51		Total for Expenses Related to Settlement:	\$ 5,278.00
52		Adjustments to Expenses Related to Settlement:	\$ -
53		Total Requested Expenses Related to Settlement:	\$ 5,278.00

Southwestern Public Service Company
Workpapers of Jeremiah W. Cunningham

PUCT DOCKET NO. _____

**APPLICATION OF
SOUTHWESTERN PUBLIC SERVICE COMPANY
TO ADJUST ITS ENERGY EFFICIENCY
COST RECOVERY FACTOR**

Attachment JWC-3(CD)