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December 21, 2018

VIA ELECTRONIC FILING

The Honorable Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street, N.E.
Washington, DC 20426

**Re: *Public Service Company of Colorado*
Southwestern Public Service Company
Docket No. ER19-____-000
Attachment O-SPS Revisions Adding Wholesale Distribution Service Formula Rate**

Dear Secretary Bose:

Pursuant to Section 205 of the Federal Power Act (“FPA”), 16 U.S.C. § 824d, and Part 35 of the Federal Energy Regulatory Commission’s (“FERC” or “Commission”) regulations, 18 C.F.R. § 35.13 (2018), Public Service Company of Colorado (“PSCo”),¹ on behalf of Southwestern Public Service Company (“SPS”), submits revised tariff records to the Xcel Energy Operating Companies FERC Electric Tariff, Third Revised Volume No. 1 (“Xcel Energy Tariff” or “Tariff”) to revise Attachment O-SPS, the SPS transmission formula rate template (“Attachment O-SPS” or “Template”). The proposed revisions to the Template establish a new formula rate mechanism (“Distribution Service Formula”) to calculate a monthly Wholesale Distribution Service Charge (“Distribution Charge”), which applies to SPS’s transmission service customers that take delivery of energy from SPS at distribution voltage (less than 69 kV) delivery points. The current Distribution Charge is a stated rate of \$2.43/kW/month established in 2000. By replacing the stated rate with the Distribution Service Formula rate, this filing establishes a rate that more accurately recovers the costs SPS incurs to provide Wholesale Distribution Service and establishes a formula rate mechanism that will update the Distribution Charge each year.

SPS respectfully requests that the Commission permit the revisions to the Template (the “Revised Template”) to become effective as of March 1, 2019, more than sixty (60) days after this filing, without suspension. As discussed below, granting SPS’s requested March 1, 2019 effective date is supported by the testimony and associated exhibits included as part of this filing.

SPS estimates that the changes included in the Revised Template will result in an increase to SPS’s 2019 revenues recovered under the Template by approximately \$0.7 million.

¹ PSCo is the designated e-Tariff filing entity for the Xcel Energy Tariff, consistent with the requirements of Order No. 714.

Upon Commission acceptance of the Revised Template, Xcel Energy Services Inc. (“XES”) and SPS will work with Southwest Power Pool, Inc. (“SPP”) to submit a companion filing to modify the SPP Tariff to reflect the Revised Template in Attachment H to the SPP Open Access Transmission Tariff (the “SPP Tariff”), effective March 1, 2019. XES and SPS will also work with SPP to modify the Network Integration Transmission Service Agreements (“NITSAs”) with the two SPS customers that currently receive Wholesale Distribution Service to replace the current stated rate with a reference to the rate calculated using the new Distribution Service Formula rate, to be effective March 1, 2019.

I. CONTENTS OF FILING

This filing consists of the following items, which are included as attachments to the XML package:

1. This transmittal letter;
2. Exhibit No. SPS-0001: A copy of the Revised Template in clean format;
3. Exhibit No. SPS-0002: A copy of the Revised Template in marked format, showing the revisions to the Template, including revisions to the associated Formula Rate Implementation Procedures (“Protocols”);
4. Exhibit Nos. SPS-0003 and SPS-0004: the Direct Testimony of Wesley L. Berger, Manager, Rate Cases for SPS (“Berger Direct Testimony”) and associated exhibits; and
5. Exhibit Nos. SPS-0005 and SPS-0006: the Direct Testimony of Arthur P. Freitas, Manager, Revenue Analysis for XES (“Freitas Direct Testimony”) and associated exhibits.²

II. BACKGROUND

A. The Filing Parties

SPS is a vertically integrated electric utility that, *inter alia*, provides generation, transmission, and distribution services in Texas and New Mexico, and owns transmission in portions of Kansas and Oklahoma. SPS provides cost-based regulated electric services to approximately 390,000 retail and wholesale customers in Texas and New Mexico. SPS’s retail electric services are subject to the jurisdiction of the Public Utility Commission of Texas (“PUCT”) and the New Mexico Public Regulation Commission (“NMPRC”); wholesale sales and transmission services are regulated by the Commission. Since 1973, SPS has been a

² Exhibits SPS-0001 and SPS-0002 submitted with this filing are the clean and marked tariff pages to the Revised Template and Protocols. Mr. Freitas is sponsoring the changes to the Revised Template included in Exhibits SPS-0001 and SPS-0002. Mr. Berger is sponsoring the revisions to the Protocols included in Exhibits SPS-0001 and SPS-0002.

transmission-owning member of the SPP, which is now a FERC-approved Regional Transmission Organization (“RTO”). Since June 2000, transmission service over the SPS transmission system has been available under the SPP Tariff. Approximately thirty-nine (39) percent of the transmission loads on the SPS transmission system are wholesale transmission service customers taking Network Integration Transmission Service (“NITS”) under the SPP Tariff.

PSCo is an affiliate of SPS, and a vertically integrated electric utility that, *inter alia*, provides generation, transmission, and distribution services in Colorado. PSCo is the designated e-Tariff filing entity for revisions to the Xcel Energy Tariff, consistent with the requirements of Order No. 714.³ PSCo is a party to this filing solely as the eTariff filing entity.

XES is the centralized service company subsidiary of Xcel Energy and, as such, performs an array of administrative and general services on behalf of the Xcel Energy Operating Companies. Among other things, XES submits filings with and appears in proceedings before the Commission on behalf of SPS.⁴

B. The Attachment O-SPS Transmission Formula Rate Template

SPS calculates its annual transmission revenue requirement (or “ATRR”) pursuant to the formulae set forth in the Template (Attachment O-SPS to the Xcel Energy Tariff). This ATRR is then used to calculate rates for Firm and Non-Firm Point-to-Point Transmission Service provided under Schedules 7 and 8 of the SPP Tariff, NITS provided under Schedule 9 of the SPP Tariff, and regional transmission costs recovered under Schedule 11 to the SPP Tariff.⁵ SPS employs a forward-looking Template, whereby the ATRR is projected under the Template each year using estimated costs and loads. The ATRR excludes the costs of distribution facilities providing distribution delivery service to wholesale customers with loads at distribution voltage.

Pursuant to the Protocols, which are included as Appendix 1 to the Template, SPS’s projected ATRR is subject to an annual true-up based on actual costs and loads when actual data becomes available. SPS calculates the true-up by June of the year following the estimated Rate

³ This filing does not affect rates or services on the PSCo transmission system under the Xcel Energy Tariff.

⁴ The Xcel Energy Tariff was filed via eTariff in *Public Service Company of Colorado*, Docket No. ER10-2070-000 (July 30, 2010), and accepted by the Commission on September 24, 2010. *See Public Service Company of Colorado*, Docket No. ER10-2070-000 (Sept. 24, 2010) (delegated letter order). The Xcel Energy Tariff was “rebaselined” in the Commission’s eTariff system effective April 16, 2016, in order to implement a new eTariff software system. The rebaselined Xcel Energy Tariff was accepted for filing in Docket No. ER16-1422-000. *Public Service Company of Colorado*, Docket No. ER16-1422 (Aug. 16, 2016) (delegated letter order).

⁵ On November 27, 2018, PSCo, on behalf of SPS, filed revisions to the Template to, *inter alia*, revise the depreciation rates applicable to the Template effective February 1, 2019. *See Public Service Company of Colorado*, Revisions to Attachment O-SPS Formula Rate Template, Docket No. ER19-404-000 (Nov. 27, 2018) (the “November 27 Filing”). The November 27 Filing is pending Commission action, with initial comments due December 28, 2018. *See Notice of Extension of Time, Public Service Company of Colorado*, Docket No. ER19-404-000 (Dec. 7, 2018).

Year, and the true-up is applied to customer bills by the end of the year following the estimated Rate Year. The Protocols provide for postings on SPS's Open Access Same-Time Information System ("OASIS"), customer meetings, discovery and challenge processes, and an Annual Informational Update filing with the Commission with the Estimated Rates for the upcoming Rate Year.

C. The Currently Effective Distribution Charge

Wholesale Distribution Service is wheeling provided to wholesale customers across SPS's distribution facilities. Wholesale Distribution Service is provided in concert with wholesale transmission service. Like all of SPS's wholesale transmission service customers, the SPS customers that receive Wholesale Distribution Service pay transmission service rates. In addition, the Wholesale Distribution Service customers pay the Distribution Charge.

Currently, two of SPS's wholesale transmission service customers take delivery of energy at distribution voltages and receive Wholesale Distribution Service: Golden Spread Electric Cooperative Inc. ("Golden Spread") and Lubbock Power & Light ("LP&L"). SPS provides Wholesale Distribution Service at twenty (20) delivery points on SPS's distribution system in Texas. The currently effective Distribution Charge, which is a stated rate of \$2.43 per kW/month, was originally agreed to by SPS and Golden Spread as a result of settlement discussions in Docket ER00-536. The Distribution Charge is included in Section 8.9 of (i) the three-party NITSA between SPP, SPS and Golden Spread, and (ii) the three-party NITSA between SPP, SPS, and LP&L.⁶

III. DESCRIPTION AND JUSTIFICATION OF PROPOSED TARIFF REVISIONS

A. Basis for the New Distribution Service Formula

The Revised Template includes a new Distribution Service Formula to calculate the Distribution Charge that will apply to SPS's Wholesale Distribution Service customers. The rate calculated using the Distribution Service Formula replaces the current stated Distribution Charge of \$2.43 per kW-month.

SPS is transitioning from a stated rate to the Distribution Service Formula because doing so: (i) replaces an outdated stated rate with a formula rate mechanism that accurately calculates the rate needed for SPS to recover the costs it incurs to provide Wholesale Distribution Service using a Template that clearly explains each cost component and data input;⁷ (ii) updates the Distribution Charge consistently as SPS's distribution investments, costs and loads change over time, subject to the same transparent annual review process that applies to SPS's wholesale transmission formula rates under the Protocols;⁸ (iii) is consistent with the Commission's

⁶ Berger Direct Testimony at 6-8.

⁷ Freitas Direct Testimony at 9-13 (explaining how the Distribution Service Formula calculates each component of the Distribution Charge).

⁸ Berger Direct Testimony at 13-14; Freitas Direct Testimony at 16-17.

position of encouraging the exploration of formula rates;⁹ and (iv) conserves the resources of SPS, its wholesale transmission customers, and the Commission by eliminating the need for periodic stated rate cases.

B. Template Revisions to Implement the Distribution Service Formula

As Mr. Freitas explains, the Distribution Service Formula calculates the Distribution Charge using a fixed charge rate (“FCR”) to determine SPS’s total company distribution revenue requirement (“Total SPS DRR”). The fixed charge rate is developed by measuring the following cost components for SPS’s distribution system on a total company basis: (i) Operations and Maintenances Expense; (ii) Taxes Other Than Income; (iii) Administrative and General Expense; (iv) Return on Rate Base; (v) Depreciation Expense; (vi) Income Tax Expense; (vii) Amortization of Excess Accumulated Deferred Income Taxes (“ADIT”); (viii) General and Intangible Plant; (ix) Cash Working Capital; (x) Accumulated Deferred Income Taxes; and (xi) Revenue Credits. A carrying charge factor is calculated for each of these cost components. These carrying charge factors are then summed to arrive at a total distribution gross-plant fixed carrying charge rate (“Carrying Charge”). The Carrying Charge is then multiplied by SPS distribution gross plant balance to arrive at the Total SPS DRR.¹⁰

SPS’s Wholesale Distribution Service customers use only a portion of SPS’s distribution system, however. Therefore, SPS makes two adjustments to the Total SPS DRR so that it includes only the portion used by the Wholesale Distribution Service customers. First, because the Wholesale Distribution Service customers currently use only SPS’s “primary voltages” distribution system, the Distribution Service Formula excludes the costs associated with facilities that are part of SPS’s secondary voltage level distribution system.¹¹ To calculate this adjustment, SPS will use SPS’s most recently filed “class cost-of-service study” filed with the PUCT (“PUCT Study”), which includes a functional breakdown of SPS’s primary voltage distribution system and its secondary voltage distribution system, to calculate the percentage share of the Total SPS DRR that makes up the primary voltage distribution system, which results in the SPS

⁹ See *Promoting Transmission Investment through Pricing Reform*, Order No. 679, 116 FERC ¶ 61,057 at P 386 (2006) (“Order No. 679”) (“[W]e continue to encourage public utilities to explore the benefits of filing transmission-related formula rates...”), *order on reh’g*, Order No. 679-A, 117 FERC ¶ 61,345 (2006), *order on reh’g and clarification*, Order No. 679-B, 119 FERC ¶ 61,062 (2007). See also *Southwest Power Pool, Inc.*, 111 FERC ¶ 61,118 at P 32 (2005) (encouraging utilities to consider adopting formula rates to facilitate timely recovery of transmission related investments).

¹⁰ Freitas Direct Testimony at 10-13.

¹¹ Freitas Direct Testimony at 7; Berger Direct Testimony at 10-11. The primary component of the distribution system begins where the transmission system ends, specifically at distribution substations. These distribution substations reduce the voltage from a transmission voltage (69 kV or greater) to a level between 2.4 kV and 33 kV. From there, primary distribution lines will extend to customers who receive service at this level. The secondary component of the distribution system consists of transformers and secondary distribution lines placed at the end of primary distribution lines. Berger Direct Testimony at 10-11.

Primary DRR.¹² Currently, that percentage is 79.41 percent. Relying on the PUCT Study is appropriate because Texas is SPS's largest jurisdiction and all of the Wholesale Distribution Service delivery points are located in Texas. Therefore, the PUCT Study measures the functional breakdown that affects SPS's Wholesale Distribution Service customers. Going forward, SPS will adjust this percentage each time SPS submits an updated PUCT Study for retail ratemaking purposes in Texas.¹³

Second, the Distribution Service Formula allocates the SPS Primary DRR between SPS's three jurisdictions (FERC, Texas retail, and New Mexico retail) using a non-coincident peak (or "NCP") demand allocator. SPS will calculate these non-coincident peaks on a calendar year basis and will use actual non-coincident peaks from the most recently available year for each jurisdiction.¹⁴ Applying this adjustment results in the Distribution ARR.

The Distribution Charge is the Distribution ARR divided by the wholesale distribution billing determinants. The Distribution Service Formula will use the prior year's actual NCPs billing determinants to estimate the following year's rate. Then, during the annual true-up process set out in the Protocols, the billing determinants will be updated with each customer's actual wholesale distribution NCPs for that calendar year.¹⁵ Mr. Freitas calculates that, for purposes of the 2019 Estimated Rate, the Distribution Charge, calculated using the Distribution Service Formula, will be \$3.965/kW-month.¹⁶

C. Corresponding Changes to the Protocols

As reflected in Exhibit Nos. SPS-0001 and SPS-0002, this filing revises the transmission formula rate Protocols to include appropriate references to the development of the Distribution Charge using the Distribution Service Formula. Specifically, additional language has been added to Sections 1, 2(a)(iv), 2(f)(ii)(6), 3(a)(iv), and 3(d)(iv) of the Protocols. In other words, the formulaic calculation of the Distribution Charge will be subject to the same procedures that apply to the development of SPS's transmission service rates (in the form of the Template's calculation of SPS's ATRR). Each year, SPS will prepare a Projected Distribution ARR. The Projected Distribution ARR will then be subject to an annual true-up based on actual costs and loads when actual data becomes available. SPS calculates the true-up by June of the year following the estimated Rate Year, and the true-up is applied to customer bills by the end of the year following the estimated Rate Year. The Distribution ARR will be subject to all of the

¹² Berger Direct Testimony at 11-12. A class cost-of-service study functionalizes retail jurisdiction costs to the electric utility functions necessary for SPS to provide service; classifies those costs according to the component of electric service that applies to each function; and allocates those costs to the customer classes based upon how each class causes those costs to be incurred. As it relates to this filing, the class cost of service study separates SPS's distribution system into its primary and secondary functions. *Id.*

¹³ Berger Direct Testimony at 11-12.

¹⁴ Freitas Direct Testimony at 13; Berger Direct Testimony at 12.

¹⁵ Freitas Direct Testimony at 8.

¹⁶ Freitas Direct Testimony at 14.

provisions of the Protocols, including those that provide for postings on SPS's OASIS, customer meetings, discovery and challenge processes, and an Annual Informational Update filing with the Commission with the Estimated Rates for the upcoming Rate Year.¹⁷

D. Subsequent Companion Filing by SPP to Revise the Wholesale Distribution Service Customers' NITSAs and Attachment H to the SPP Tariff

Currently, Section 8.9 of the Golden Spread NITSA and the LP&L NITSA provide that the Wholesale Distribution Service Charge is "\$2.43 times the maximum metered kW per distribution delivery point, adjusted for losses as described in Section 8.6 above, per month."¹⁸ Each of these NITSAs is a three-party agreement between SPP, SPS, and the customer. As such, SPP is responsible for filing with the Commission any change to the Golden Spread NITSA and the LP&L NITSA that requires such a filing.

Upon acceptance of this filing, SPS will work with SPP, Golden Spread, and LP&L to modify Section 8.9 of each NITSA to refer to the Distribution Charge calculated using the new Distribution Service Formula, similar to how the Meter Charge stated in the current NITSAs refers to the Template. Specifically, the reference to "\$2.43 . . ." in Section 8.9 of the current NITSAs would be replaced with "The Monthly Wholesale Distribution Service Charge per kW as stated in the Xcel Energy Operating Companies Open Access Transmission Tariff, Attachment O-SPS, Table 1 . . ."¹⁹ SPS anticipates that this revision to Section 8.9 of the Golden Spread and LP&L NITSAs will be filed as compliance filings in response to the Commission's order on this filing with a requested effective of March 1, 2019.

In addition, the Template is incorporated in Attachment H to the SPP Tariff. Upon Commission acceptance of this filing, SPS will also work with SPP to submit a companion filing to modify the SPP Tariff to reflect the Revised Template in Attachment H to the SPP Tariff effective March 1, 2019.

IV. INFORMATION RELATING TO THE EFFECT OF THE RATE CHANGE

The Revised Template will affect the Distribution Charge revenues collected from Golden Spread and LP&L, but will not affect SPS's other wholesale transmission customers. The Revised Template's impacts are shown in Exhibit No. SPS-0004 (Estimated Revenue Impact of Filing) and are summarized in the following table:

¹⁷ Berger Direct Testimony at 13-14.

¹⁸ Berger Direct Testimony at 14.

¹⁹ Berger Direct Testimony at 15.

Table 1 - Annual Customer Impact

	Current Distribution Charges	2019 Estimate Using SPS Proposed Formula	Estimated Increase (Annualized) (\$)
Golden Spread	\$349,784	\$570,738	\$220,954
LP&L	\$761,722	\$1,242,893	\$481,170
Total Wholesale	\$1,111,506	\$1,813,631	\$702,124

To estimate the effect of the rate changes in this filing, Mr. Berger used the current Template (as revised in Docket No. ER19-404-000) to calculate the impact on the 2019 total estimated transmission service charges and Distribution Charge revenues by wholesale customer. Using the most recent available billing determinants (September 2017 – August 2018), Mr. Berger calculated the annual impact to Golden Spread and LP&L. The proposed Template revisions increase SPS’s transmission service revenues (in the form of an increase in Distribution Charge revenues) by approximately \$0.7 million per year on an annualized basis. The actual increase for 2019 should be lower than \$0.7 million because SPS has requested an effective date of March 1, 2019, which means that the revised Distribution Charge will be in effect for only ten months rather than 12 months in 2019.²⁰

V. OTHER FILING REQUIREMENTS

None of the costs proposed to be recovered in the Revised Template have been alleged or judged in any administrative or judicial proceeding to be illegal, duplicative, or unnecessary costs that are demonstrably the product of discriminatory employment practices.²¹

VI. REQUESTED EFFECTIVE DATE

SPS respectfully requests that the Commission allow the revisions to become effective March 1, 2019, more than sixty (60) days after filing, without suspension or modification. This effective date will allow SPS to begin recovering its properly measured costs of providing Wholesale Distribution Service without delay. Then, in the 2019 Annual True-up, calculated in June 2020, the Revised Template would be used to derive the 2019 actual Distribution Charges and true-up, with the true-up recovered (or refunded) in the Estimated Distribution Charges for 2021, giving effect to the Revised Template back to March 1, 2019, plus interest back to that date.

Good cause exists to grant SPS’s requested March 1, 2018 effective date. To the extent the Commission chooses to suspend the effectiveness of the Revised Template, it should do so

²⁰ Berger Direct Testimony at 15-16.

²¹ 18 C.F.R. 35.13(b)(7) (2018).

for a nominal, one-day suspension period. In *West Texas Utilities Co.*,²² the Commission explained that a nominal suspension period is justified in cases where no more than ten percent of the proposed increase appears to be excessive. Here, although the percentage increase in Distribution Charges as compared to the currently effective Distribution Charge is significant, the overall rate impact of SPS's filing is an increase of roughly 0.74 percent in total SPS 2019 wholesale transmission service revenue.²³

In any event, no part of the proposed increase is excessive. SPS's costs of providing Wholesale Distribution Service have increased since 2000. The Distribution Service Formula accurately measures SPS's cost of providing Wholesale Distribution Service using a Template that clearly explains each cost component and data input and subject to a transparent annual review process under the associated Protocols.²⁴

VII. REQUESTS FOR WAIVER

A. Requests for Waiver to Provide Cost-of-Service Statements

SPS respectfully requests that the Commission recognize that SPS has endeavored to comply fully with the Commission's filing requirements set forth in Part 35 of the Commission's regulations. In the event that the Commission, upon review of the filing, should find that SPS has misinterpreted or failed to respond in some detail to such filing requirements, SPS requests that the Commission waive any failure to comply strictly with such filing requirements in recognition of SPS's good faith attempt at compliance.

To the extent necessary, SPS respectfully requests waiver of any requirement to submit cost-of-service statements. Specifically, SPS requests waiver of the following sections of the Commission's regulations: Sections 35.13(d)(1)-(2) (Period I and II data for Statements AA through BM), Section 35.13(d)(5) (workpapers related to Period I and II data), and Section 35.13(h) (cost-of-service statements).²⁵ Good cause exists to grant these waivers. Detailed statements of SPS's cost of service are not needed because the Revised Template will calculate the Distribution Charge on a formulaic basis and will be trued-up each year to the Company's actual costs. The Commission has routinely granted such waiver requests in similar proceedings where a party has proposed to implement or modify a formula rate construct.²⁶

²² *West Texas Utilities Co.*, 18 FERC ¶ 61,189 at 61,375 (1982), which states that a "utility's increased rates will be suspended for only one day instead of the five month maximum in those cases where our preliminary analysis indicates that no more than ten percent of the increase appears to be excessive."

²³ See Exhibit No. SPS-0004, page 1.

²⁴ Berger Direct Testimony at 13-14; Freitas Direct Testimony at 9-13 and 16-17.

²⁵ See 18 C.F.R. § 35.13(d)(1)-(2), (d)(5), (h) (2018).

²⁶ *Duke Energy Progress, Inc.*, 149 FERC ¶ 61,220, at P 77 (2014) (granting waiver of Period I and II data, consistent with "prior approval of formula rates"); *Pub. Serv. Co. of New Mexico*, 142 FERC ¶ 61,168, at P 29 (2013) (granting waiver of Period I and II data), *reh'g denied*, 143 FERC ¶ 61,227 (2013); *S. California Edison Co.*, 136 FERC ¶ 61,074, at P 29 (2011); *Xcel Energy Servs. Inc.*, 122 FERC ¶ 61,098, at P 75 (2008) (granting waiver of Period I and II data), *on reh'g*, 125 FERC ¶ 61,092 (2008); *American Elec.*

In addition, specific support for SPS's revisions to add the Distribution Formula to the Template is contained in the testimony, supporting exhibits, and other materials included with this filing. This includes the Exhibits included with the Berger Direct Testimony and Freitas Direct Testimony.

VII. CORRESPONDENCE AND COMMUNICATIONS

The following persons are authorized to receive notices and communications with respect to this filing:

William A. Grant*	Wesley L. Berger*
Regional Vice President – Rates and Regulatory Affairs	Manager, Rate Cases
Southwestern Public Service Company	Southwestern Public Service Company
790 Buchanan Street - 7	790 Buchanan Street - 7
Amarillo, TX 79101	Amarillo, TX 79101
(806) 378-2928 (phone)	(806) 378-2891 (phone)
William.a.grant@xcelenergy.com	wes.berger@xcelenergy.com
James P. Johnson*	Kenneth B. Driver*
Assistant General Counsel	Serena A. Rwejuna
Xcel Energy Services Inc.	JONES DAY
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Minneapolis, MN 55401	Washington, D.C. 20001
(612) 215-4592 (phone)	(202) 879-3939 (phone)
james.p.johnson@xcelenergy.com	kbdriver@jonesday.com

SPS requests that the individuals identified above with an asterisk be placed on the Commission's official service list in this proceeding. SPS respectfully requests waiver of Section 385.203(b)(3) of the Commission's regulations to permit the designation of more than two persons upon whom service is to be made in this proceeding.²⁷

VIII. SERVICE AND POSTING

SPS will serve a copy or notice of this filing on the state regulatory commissions with jurisdiction over SPS and on each network transmission service customers in Zone 11. A courtesy copy or notice will be served on the Director, Division of Tariffs and Market

Power Serv. Corp., 120 FERC ¶ 61,205, at P 41 (2007) (granting waiver of Period I and II data), *reh'g denied*, 121 FERC 61,245 (2007); *Commonwealth Edison Co.*, 119 FERC ¶ 61,238, at PP 92-94 (2007) (granting waiver of Period I and II data and cost-of-service statements), *reh'g granted in part*, 122 FERC ¶ 61,037 (2008), *reh'g granted in part*, 124 FERC ¶ 61,231 (2008).

²⁷

18 C.F.R. § 385.203(b)(3) (2018).

Development (Central). A copy of the filing is also available for public inspection in the offices of SPS in Amarillo, Texas.

IX. CONCLUSION

For the reasons stated above, SPS respectfully requests that the Commission accept the revised e-Tariff records, to be effective March 1, 2019. SPS further requests the Commission grant all of the waivers requested herein.

Respectfully submitted,

/s/ James P. Johnson

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*Xcel Energy Services Inc., on behalf of
Public Service Company of Colorado and
Southwestern Public Service Company*

Cc: SPS State Commissions
SPS Zone 11 Network Transmission Service Customers
Director, Division of Tariffs and Development (Central)