BEFORE THE NEW MEXICO PUBLIC REGULATION COMMISSION

IN THE MATTER OF SOUTHWESTERN PUBLIC SERVICE COMPANY'S APPLICATION FOR APPROVAL OF ITS 2025-2027 TRANSPORTATION ELECTRIFICATION PLAN; PROPOSED PLAN RIDERS AND CREDIT; AND OTHER ASSOCIATED RELIEF,	)	**Case No. 24-00___-UT**
SOUTHWESTERN PUBLIC SERVICE COMPANY,	)	
APPLICANT.	)	

DIRECT TESTIMONY

of

ALEXANDER G. TROWBRIDGE

on behalf of

SOUTHWESTERN PUBLIC SERVICE COMPANY

April 1, 2024

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GLOSSARY OF ACRONYMS AND DEFINED TERMS

Acronym/Defined Term	Meaning
Commission	New Mexico Public Regulation Commission
EV	electric vehicle
EV stations	EV charging stations
EV Rider	EV Infrastructure Rider
kWh	kilowatt hour
MPG	Miles per Gallon
MPGe	Miles per Gallon Equvialent
NMPRC	New Mexico Public Regulation Commission
PSCO	Public Service Company of Colorado
SEC	Securities and Exchange Commission
SGS	Secondary General Service
SPS	Southwestern Public Service Company, a New Mexico corporation
TEP	Transportation Electrification Plan
TOU	Time-of-Use

LIST OF ATTACHMENTS

Attachment	Description
AGT-1	List of Prior Testimony (*Filename:* AGT-1.docx)
AGT-2	Electric Vehicle Infrastructure Rider (Rate No. 78) (*Filename:* AGT-2.docx)
AGT-3	Calculation of EV Infrastructure Rider Rate (*Filename:* AGT-3.xlsx)
AGT-4	Electric Vehicle Charging Optimization Credit Rider (Rate No. 80) (*Filename:* AGT-4.docx)
AGT-5	Public Electric Vehicle Charging Rate Calculation (*Filename:* AGT-5.docs)
AGT-6	Bill Impact of EV Infrastructure Rider (*Filename:* AGT-6.xlsx)

Case No. 24-00___-UT
Direct Testimony
of
Alexander G. Trowbridge

I. WITNESS IDENTIFICATION AND QUALIFICATIONS

Q. Please state your name and business address.

A. My name is Alexander G. Trowbridge. My business address is 1800 Larimer Street, Denver, Colorado 80202.

Q. On whose behalf are you testifying in this proceeding?

A. I am filing testimony on behalf of Southwestern Public Service Company, a New Mexico corporation ("SPS"), and wholly-owned subsidiary of Xcel Energy Inc.

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

A. I am employed by SPS as Manager, Pricing and Planning.

Q. Please briefly outline your responsibilities as Manager, Pricing and Planning.

A. I am responsible for financial and policy analyses associated with SPS's electric rates, in addition to the regular administration of SPS's electric tariffs. Those duties include providing quantitative analyses, cost allocation, rate design, and policy support on various state regulatory issues.

Q. Please describe your educational background.

A. I have a Bachelor's degree with a major in Accounting from Fort Lewis College (AACSB Accredited) in Durango, Colorado.

Q. Please describe your professional experience.

A. I began my career in public accounting (1999-2005), including Deloitte & Touche in Denver, Colorado, and Los Angeles, California. Through my roles in public accounting, I have led audits of various Fortune 500 Companies and participated in Public Company Accounting Oversight Board ("PCAOB") Audits and Securities and Exchange Commission ("SEC") investigation activities. My public accounting industry experience includes manufacturing, real estate, construction, insurance, banking, and investing.

Following six years in public accounting, I was employed by Sun Microsystems (2005–2009), first as a Technical Lead and Senior Financial Analyst responsible for technical research and financial modeling support related to acquisition and divesture activity, and later as the company's SEC Reporting Manager; responsible to supervise the preparation of the SEC financial statements.

In May 2009, I was hired by Xcel Energy as a Principal Financial Consultant in the Transaction Enablement Accounting and Reporting group within the Utility Accounting organization. My principal duties were to evaluate all commercial contracts for lease, variable interest entity, derivative, and/or other technical accounting implications. I was responsible for developing accounting

policies and documentation related to new transactions and/or the implementation of new or revised accounting standards. In 2012, I accepted a rotational position in the Controller's organization, where I served as the interim Manager of Financial Reporting for Xcel Energy, and the Manager of Regulatory Accounting for Public Service Company of Colorado ("PSCO"). Beginning in 2014, I served in the Rates and Regulatory Affairs organization in PSCO, first as the Principal Rates Consultant and later as the Manager of Regulatory Administration. In the pricing role, I was responsible for the development of new rate design proposals or modifications to existing rates to ensure effective price structures, increased options for customers, and compliance with regulatory requirements. In the Regulatory Administration role, I managed the resources necessary to make timely and complete regulatory filings, including support for the filing of general rate case filings, certificates of need, and rate rider filings.

In September 2023, I accepted the role of Manager of Pricing and Planning for SPS.

Q. Do you hold any professional licenses or certifications?

A. Yes. I am a Certified Public Accountant and maintain an active license in the State of Colorado.

Q. Have you testified before any regulatory authorities?

A. Yes. I testified before the New Mexico Public Regulation Commission ("Commission" or "NMPRC") in Case No. 23-00071-UT. I have also testified in numerous proceedings before the Colorado Public Utilities Commission on a variety of topics. A list of those matters is provided as Attachment AGT-1 to my direct testimony.

II. PURPOSE OF TESTIMONY AND RECOMMENDATIONS

Q. Please summarize the purpose of your testimony?

A. First, I discuss the existing rates that apply to electric service for electric vehicle ("EV") charging at home. Second, I discuss SPS's EV Infrastructure Rider ("EV Rider"), which is designed to recover the cost of the SPS Transportation Electrification Plan ("TEP"). Third, I describe changes to the SPS's EV Charging Equipment Rider. Fourth, I discuss two program alternatives SPS proposes to provide to customers who participate in the EV Charging Optimization program. Under the program, EV customers receive a credit to incentivize charging during off-peak hours. Next, I discuss SPS's continued proposal for public EV charging stations ("EV stations") that will be operated by SPS in areas where privately-owned charging stations may not be financially attractive to potential investors. The public charging station service supplements SPS's efforts to partner with commercial and municipal interests to provide EV charging throughout the SPS service area. The rate applicable for the power provided at SPS-operated charging stations is based upon a kilowatt hour ("kWh") charge, with a higher rate during SPS peak hours. The last section of my testimony concerns the bill impacts of SPS's proposed TEP cost recovery through the EV Rider.

Q. Please summarize the conclusions reached in your testimony.

A. EV charging offers customers another option for transportation, powered by electricity that is often and increasingly provided by renewable sources such as wind and solar. EV charging, including an expanded availability of EV charging stations, will allow SPS to further spread the overall cost of providing service to off-peak periods. The tariffs attached to my testimony allow SPS to recover the cost of EV infrastructure expansion in New Mexico as detailed in the TEP. The Commission should approve the two proposed tariffs in my testimony:

- Electric Vehicle Infrastructure Rider (Rate No. 78), and
- Electric Vehicle Charging Optimization Credit Rider (Rate No. 80)

Q. Were Attachments AGT-1 through AGT-6 prepared by you or under your direct supervision and control?

A. Yes.

III. RATES TO RECOVER TEP COSTS

A. Rates Applicable to EV Charging at Home

Q. Is SPS proposing a new rate to provide power for charging residential customer EVs?

A. No. A residential customer can either continue to take all service under the generally available Residential Service or Residential Heating Service rate, as applicable to each customer, or convert to an optional Time of Use ("TOU") rate that is currently available. If additional kWh from EV charging significantly increases a residential customer's level of consumption during off-peak hours, it could be advantageous for that customer to take service under the TOU option[1].

Q. Please explain SPS's TOU rate.

A. The TOU rate is an option that charges a lower kWh energy charge during off-peak hours but a significantly higher kWh energy charge during on-peak hours. If a residential customer does not choose the TOU option, the energy charge per kWh under the generally applicable Residential Service or Residential Heating Service rate remains the same regardless of when the customer takes service. In the four

[1] Rate 1 - Residential Service.pdf (rtsclients.com)

summer months of June through September, the standard Residential Service energy charge per kWh is higher than in the non-summer (winter) months of January through May and October through December. The TOU off-peak charge operates differently; remaining the same during summer off-peak hours as well as off-peak winter months. Compared to Residential Service, the off-peak TOU kWh energy charge is 29.7% lower than the Residential Service energy charge in the summer, and 15.6% lower than the Residential Service energy charge during the off-peak winter months. If a Residential TOU customer can manage energy consumption during on-peak hours so that a higher level of energy consumption occurs during off-peak hours compared to an average Residential Service customer, then the TOU option can result in savings.

Q. What are the on-peak hours under the TOU option?

A. On-peak hours occur during the four peak summer months of June through September, Monday through Friday, from 12 noon through 6 p.m., which totals 522 hours. As a result, on-peak hours represent only 18% of the hours that span June through September, and off-peak hours represent the remaining 82% of the hours during those months. For the other off-peak winter months, the off-peak TOU is in

effect during all hours. All totaled, the lower off-peak TOU kWh energy rate is in effect for 94% of the hours in a year.

B. EV Infrastructure Rider

Q. Please describe the proposed EV Infrastructure Rider.

A. SPS proposes to continue to recover the cost of developing EV infrastructure through the EV Infrastructure Rider, which, as proposed, is a percentage-based charge applied to base rate revenue on customer bills. I have included the proposed EV Infrastructure Rider tariff as Attachment AGT-2 to my direct testimony.

Q. How was the proposed charge for the EV Infrastructure Rider developed?

A. As shown in Attachment AGT-3, the charges are based upon the revenue requirement determined by SPS witness Stephanie N. Niemi divided by estimated base rate revenue from all customer classes for the year 2025.

Q. Why is SPS proposing a percentage-based rate applied to base rate revenue?

A. The expansion of electric-powered transportation encompassed in NMSA Section 62-8-12 is a legislative initiative. SPS TEP costs will be recovered from all customer classes. This is consistent with the Company's existing tariff. Costs incurred under the SPS TEP for facilities to charge EVs are both energy and demand-related, and will require additional customer-related costs to implement,

operate, administer, manage, and evaluate the program. A percentage-based charge will therefore apply to base rate charges, which result from customer-related, energy-related, and capacity-related costs.

C. EV Charging Equipment Rider

Q. Please describe changes to the SPS's EV Charging Equipment Rider.

A. Due to low customer participation and barriers to implement and support effectively, SPS proposes to close the EV Accelerate at Home offering which provided EV home charging equipment for a monthly fee. SPS witness Patrick J. Murphy discusses this strategy recommendation in his direct testimony.

D. EV Charging Optimization Credit

Q. Please explain Attachment AGT-4 EV CHARGING OPTIMIZATION CREDIT.

A. The EV Charging Optimization Credit provides an annual $50.00 credit to a customer with EV charging equipment if the customer allows SPS to install equipment to monitor the times when the customer can charge an EV using the customer's equipment.

A second charging optimzation option introduced in this TEP plan referred to as 'Charging Perks' allows SPS to optimize charging customer EVs remotely, as

opposed to based on a fixed time period. Participants in the Charging Perks option will be provided with an upfront $50.00 credit at the time that the customer signs up under the program, and an annual $50.00 credit for continued participation in the program. Overall, the credits provide an incentive to EV customers to charge during off-peak hours, and is applied to the customer's bill for SPS electric service after the SPS peak period concludes at the end of September. Mr. Murphy describes the EV Charging Optimization program in his direct testimony. Rather than recommending a broad change in this rate from the Commission approved rate in Case No. 20-00150-UT, SPS has included minor modifications to the tariff to describe the second charging optimzation option introduced in this TEP.

IV. SPS-OPERATED EV CHARGING STATIONS

Q. Please explain Attachment AGT-5, Public EV Charging Service Rate Calculation.

A. SPS proposes to maintain its currently approved rate of 18.3 cents per kWh during off-peak periods. During on-peak periods, SPS proposes to maintain its currently approved rate of 36.6 cents per kWh for the SPS peak hours of 12 p.m. through 6 p.m. during the summer months of June through September, Monday through Friday. The Commission approved rates in Case No. 20-00150-UT, were based on a cost comparison of cents per mile between an EV and a gas powered vehicle, described later in my testiomony. SPS is not recommending a change in this rate from the Commission approved rate in Case No. 20-00150-UT based on the fact that gas prices have not changed significantly since the time frame the rate was originally set[2].

[2] In 2021, the average price of gasoline in the US was $3.01 per gallon. The U.S. retail price for regular-grade gasoline, the price consumers pay at the pump, averaged $3.52/gal in 2023. However, prices decreased to $3.05/gal at the end of 2023.

Q. What does fast charging cost nationally?

A. A very broad estimate is a range of 25 cents to 75 cents per kWh, with a lot of outliers at either end[3].

Q. How Do Kilowatts Equate to Gallons of Gas?

A. A gallon of gas contains the energy equivalent of 33.7 kWh[4] of electricity and the average EV battery has about 70 kWh of usable energy. This is the equivalent of 2.1 gasoline gallons. A very efficient 30 miles per gallon ("MPG") internal combustion car could get 63 miles out of a 2.1gallon tank, but the average EV can travel 238 miles on 70 kWh[5]. For the average battery at 18.3 cents per kWh, it will cost $12.81 to charge the battery.

Q. Why is the proposed on-peak rate to charge an EV at an SPS-operated EV station double the rate that would be charged during other hours?

A. A significant increase in EV charging during the SPS system peak periods could defeat a potential benefit of the development of the EV infrastructure, which is to expand the recovery of system capacity costs during off-peak periods. Therefore,

[3] How Much Does It Cost For Public Network DC Fast Charging For EVs? – Forbes Home

[4] Document Display | NEPIS | US EPA

[5] How Much Does It Cost For Public Network DC Fast Charging For EVs? – Forbes Home

it is important to dissuade drivers from charging during peak hours. SPS could simply make the charging stations unavailable during peak hours, but concluded that charging should be available at all times if drivers urgently need a charge, with the understanding that the charge will be significantly higher during on-peak periods.

Q. Describe the basis for the 18.3 cents per kWh rate.

A. SPS developed a $/kWh rate that compares the cents per mile of a gas powered vehicle to that of an EV. The calculation compares a 95 MPG equivalent ("MPGe") EV compared to a 30 MPG gasoline vehicle, a ratio of 3.17. From an energy perspective the formula for MPGe is calculated as 33.7 kWh[6] of electricity = 1 gallon of gas. However, there are losses to account for between power delivery to the station, the charging equipment, and losses between charging the battery and discharge for use. While there are a range of potential assumptions, SPS used 39 kWh equivalent to one gallon of gasoline after accounting for an approximation of lost power in charging an EV battery. A variety of factors can influence a comparison, such as the types of vehicles and driving scenarios. Assuming a cost

6 Document Display | NEPIS | US EPA

of $2.25 per gallon for a gas powered vehicle, the average cost per mile of a 30 MPG gasoline vehicle would be 7.5 cents per mile. Assuming, 39 kWh equals 1 gallon of gas, 39*18.3 cents = $7.14/95 MPGe = 7.5 cents per mile. The following table illustrates the comparison:

Table AGT-1 – Cents per Mile Equivalent Cost

Gasoline vehicle	30 miles per gallon
EV	95 miles per gallon-equivalent

Gasoline Vehicle

1 gallon of gasoline at $2.25 per gallon
30 miles per gallon = $2.25 ÷ 30 = 7.5 cents per mile

Electric Vehicle

39 kWh = 1 gallon of gasoline
39 kWh x 18.3 cents SPS Public Charging rate = $7.14
95 mpg-e = $7.14 ÷ 95 = 7.5 cents per mile

Q. At this early stage of the development of the EV infrastructure, can it be expected that rates charged for public EV charging would recover the cost of those facilities?

A. It is unlikely. Load factors are expected to be less than 2%, which is extremely low. By comparison, the load factor for the Secondary General Service ("SGS") customer class was approximately 46.5% for the test year ended on June 30, 2024

in Case No. 22-00286-UT. With an average 46.5% SGS load factor compared to an expected 1.3% Public EV Charging Service load factor, a comparable Public EV Charging Service rate would be approximately $3.54 per kWh,[7] before including the cost of fuel and purchased power, Renewable Portfolio Standard and energy efficiency costs charged to other customers, as well as the EV charging facilities. A $3.54 per kWh rate would be prohibitive and discourage use of the public EV charging facilities, but it illustrates how the cost of capacity requirements for public charging are under-recovered at a slim 1.3% load factor.

Q. Can SPS readily adjust the cost per kWh at an SPS public charging station?

A. SPS does not believe that is permissible. As a service from a regulated utility under a tariffed rate, it would require Commission authorization. SPS is offering the Public EV Charging Service to contribute to the development of the EV infrastructure by making charging locations more available in areas that may be underserved by non-regulated commercial interests.

[7] = 46.5% ÷ 1.3% x 9.90¢ per kWh

Q. Does the Public EV Charging Service include an idling charge, as was included in the per-minute rate in SPS's initial proposal?

A. Yes. The approved rate includes the same $0.53 per minute idling charge that commences 10 minutes after charging is completed. The same concept applies with a per kWh-based EV charge rate as with the initial per minute-based rate; that EV drivers should not remain in a charging location for long periods of time after charging is complete, allowing other EV drivers to charge more readily. I recommend that the idling charge rate remain unchanged from the Commission approved rate in Case No. 20-00150-UT.

Q. What is the cost for SPS power for EV charging at a commercial location?

A. Secondary General Service would be the applicable rate for a commercial customer with a 50 kilowatts or higher charger. Secondary General Service rates resulting from recently concluded SPS Case No. 22-00286-UT averaged $0.099 per kWh, including fuel and base rate charges.

Q. Would the rates charged at SPS-operated EV stations be sufficient to cover the cost of constructing and maintaining those facilities in the near-term?

A. It is unlikely, at least in the early years of the TEP. SPS is proposing to operate EV stations in locations where it is not financially viable for private companies to do

so, thereby filling a gap in the EV charging market and reducing potential range anxiety of EV drivers in the area. Cost recovery for an SPS-operated EV charging station from revenues generated by that station is contingent upon how often it is used, resulting in revenue to offset the costs to install, operate, and maintain each station. If the charging stations are used only occasionally, for example two percent of the time available, revenue generated by the SPS-operated EV stations will be insufficient to recover the expected costs. SPS proposes to include the costs to install and operate its public EV charging stations for recovery through the EV Rider, with revenue from charging at those stations offsetting the costs.

V. BILL IMPACT

Q. What impact has recovery of the EV Rider had on a residential customer's monthly bill of 900 kWh?

A. Charges under the EV Infrastructure Rider would add approximately $0.18 to a 900 kWh average residential customer's monthly bill, or 0.15%. Attachment AGT-6 includes the calculation of bill impact at different levels of usage for residential customers, as well as customers in other customer classes.

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

A. Yes.

BEFORE THE NEW MEXICO PUBLIC REGULATION COMMISSION

IN THE MATTER OF SOUTHWESTERN PUBLIC SERVICE COMPANY'S APPLICATION FOR APPROVAL OF ITS 2025-2027 TRANSPORTATION ELECTRIFICATION PLAN; PROPOSED PLAN RIDERS AND CREDIT; AND OTHER ASSOCIATED RELIEF,	)	**Case No. 24-00___-UT**
SOUTHWESTERN PUBLIC SERVICE COMPANY,	)	
APPLICANT.	)	

VERIFICATION

On this day, April 1, 2024, I, Alexander G. Trowbridge, swear and affirm under penalty of perjury under the law of the State of New Mexico, that my testimony contained in Direct Testimony of Alexander G. Trowbridge is true and correct.

/s/Alexander G. Trowbridge
ALEXANDER G. TROWBRIDGE

Southwestern Public Service Company
List of Prior Testimony

Commission	Docket No.	Proceeding
NMPRC	23-00071-UT	Southwestern Public Service - Coumunity Solar Gardens Phase II
CPUC	23A-0204G	Public Service Company of Colorado - Meter Programs
CPUC	22A-0382ST	PSCo - Steam Regulatory and Resource Plan
CPUC	22A-0140G	Public Service Company - Gathering System Abandoned - UGC
CPUC	21A-0625EG	Public Service Company - Renewable Energy Compliance Plan
CPUC	21A-0370E	Public Service Company of Colo - ECA Prudence Review
CPUC	21A-0146E	Public Service of Colorado - PCCA
CPUC	21A-0141E	Public Service of Colorado - 2021 ERP and CEP
CPUC	20AL-0432E	Public Service Company of Colo-AL 1835-Tariff 8 Phase ll
CPUC	20AL-0092G	Public Service Company of Colorado - AL 963-Tariff 6-GAP
CPUC	20AL-0090E	Public Service Company of Colorado - AL1819-Tariff 8-EAP
CPUC	20A-0327E	ECA - Public Service Company of Colorado
CPUC	20A-0137E	Public Service Company of Colorado - 2019 PCCA
CPUC	19A-0369E	Public Service Company - Renewable Energy Compliance Plan
CPUC	19A-0142E	Purchased Capacity Cost Adjustment-Public Service Company
CPUC	18AL-0862G	Public Service Company of Colo- AL 1785 -Tariff 8-Dist Ext
CPUC	18AL-0852E	Public Service Company of Colo- AL 1785 -Tariff 8-Dist Ext
CPUC	18A-0177E	Public Service Company - Purchased Capacity Cost Adjustment
CPUC	17A-0797E	Public Service Company - Accelerated Depreciation RESA Reduction - AD/RR
CPUC	17A-0206E	Public Service Company - Purchased Capacity Cost Adjustment
CPUC	16A-0276E	Public Service Company - Joint Dispatch Agreement
CPUC	16A-0208E	Public Service Company - Purchased Capacity Cost Adjustment
CPUC	16A-0053G	Public Service Company - Cost of Service Gas Program (COSG)
CPUC	15A-0260G	Public Service Company- Gathering System Abandoned - Vaquero
CPUC	15A-0193E	Public Service Company - Purchased Capacity Cost Adjustment

SOUTHWESTERN PUBLIC SERVICE COMPANY

THIRD REVISED RATE NO. 78 X
CANCELING SECOND REVISED RATE NO. 78 X

ELECTRIC VEHICLE INFRASTRUCTURE RIDER

APPLICABLE: To bills for electric service under SPS retail rate tariffs. For the recovery of costs to implement and operate electric vehicle ("EV") programs.

TERRITORY: Area served by SPS in New Mexico.

RIDER: A percentage-based charge that will apply to the amount charged to each customer for all base rate charges, as provided in the applicable SPS tariff for electric service, which includes the service availability charge, energy charge, demand charge, and power factor credit or charge.

For the calendar year 2025: 0.2866% x base rate charges X

Charges shown above may be modified periodically, as authorized by the New Mexico Public Regulation Commission, as a result of changes in estimated costs, EV cost recovery balances, applicable base rate revenue, or other factors that may be identified from the time this rider becomes effective.

INTEREST ON OVER AND UNDER RECOVERY: Monthly over- and under-recovery balances will include interest at the customer deposit interest rate set by the NMPRC each January.

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Advice Notice No.
REGIONAL VICE PRESIDENT – REGULATORY & PRICING

Southwestern Public Service Company

Calculation of Electric Vehicle Infrastructure Rider
For the 2021, 2022, and 2023 Calendar Years

SOUTHWESTERN PUBLIC SERVICE COMPANY

New Mexico Retail

EV Infrastructure Rider Rate

Effective January 1st, 2025

			Informational only			
		2025		**2026**		**2027**
2025 Electric Vehicle Revenue Requirement	$	1,615,082	$	2,486,541	$	3,805,677
divided by: Forecasted 2025 New Mexico Base Rate Revenue, all customer classes	$	563,625,008	$	595,504,780	$	609,346,410
= EV Rider, % of Base Rate Revenue		0.2866%		0.4176%		0.6246%

Note: 2026 and 2027 are estimates that may be affected by over- or under-recovery balances from prior years, and may be revised at a later date due to changes in estimated costs and applicable base rate revenue.

SOUTHWESTERN PUBLIC SERVICE COMPANY

FIRST REVISED RATE NO. 80 X
CANCELING ORIGINAL RATE NO. 80 X

ELECTRIC VEHICLE CHARGING OPTIMIZATION CREDIT

APPLICABLE: Under agreement with SPS, as described in the SPS Transportation Electrification Plan, to customer premises taking service under Residential Service or Residential Heating Service, and that a have qualifying electric vehicle or electric vehicle ("EV") charging equipment at the premise. Availability is restricted to electric vehicle or EV charging equipment whose operation is able to communicate charging data to SPS through an approved vendor. X X

In addition to charges for electric service at applicable rate, which also includes the Fuel and Purchased Power Cost Adjustment Clause, RPS Cost Rider, RPS Reconciliation Rider, Energy Efficiency Rider, and other charges that may take effect with New Mexico Public Regulation Commission authorization.

TERRITORY: Area served by SPS in New Mexico.

CREDIT: $50.00 per year, applied to the customer's bill for SPS electric service of each year the credit is earned. For the active optimization program, additional $50 at time of enrollment. As authorized by the New Mexico Public Regulation Commission, credit may be adjusted periodically. X X X

TAX ADJUSTMENT: Billings under this schedule may be adjusted by an amount equal to the sum of the taxes payable under the Gross Receipts and Compensating Tax Act and of all other taxes, fees, or charges (exclusive of ad valorem, state and federal income taxes) payable by the utility and levied or assessed by any governmental authority on the public utility service rendered, or on the right or privilege of rendering the service, or on any object or event incidental to the rendition of the service.

TERMS AND CONDITIONS:

- Credit is earned through participation in the one of EV Optimization Programs and will be paid to all customers enrolled at the time the credit posts to their bill; X
- Customer participation will be reviewed at the end of each calendar year; X X X

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REGIONAL VICE PRESIDENT –
REGULATORY & PRICING

SOUTHWESTERN PUBLIC SERVICE COMPANY

FIRST REVISED RATE NO. 80 **X**
CANCELING ORIGINAL RATE NO. 80 **X**

ELECTRIC VEHICLE CHARGING OPTIMIZATION CREDIT

TERMS AND CONDITIONS (continued):

- If SPS determines that the charging data it receives from an approved vendor has been rendered ineffective due to tampering by use of mechanical, electrical, or other devices or actions by the customer:
  - the customer's participation in the program may be terminated;
  - SPS may rebill all prior load management credits received by the customer to the date the tampering appears to have first occurred or for the previous twelve months, whichever is longer; and
  - A customer removed from the program is only eligible to renew participation at the discretion of SPS, after SPS has verified it is able to collect accurate charging data for the customer.

LIMITATION OF LIABILITY: Customers who elect to participate in the EV Charging Optimization Credit program shall agree to indemnify and save harmless SPS from all personal or property claims or losses of any sort resulting from interruption of electric service under the EV Charging Optimization Credit program.

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REGIONAL VICE PRESIDENT –
REGULATORY & PRICING

Southwestern Public Service Company
Comparison of Equivalent Power to Operate Electric and Gasoline-Powered Vehicles

(1) SPS Assumptions

Gasoline vehicle	30 miles per gallon
EV	95 miles per gallon-equivalent

Gasoline Vehicle

1 gallon of gasoline at $2.25 per gallon
30 miles per gallon = $2.25 ÷ 30 = 7.5 cents per mile

Electric Vehicle

39 kWh = 1 gallon of gasoline
39 kWh x 18.3 cents SPS Public Charging rate = $7.14
95 mpg-e = $7.14 ÷ 95 = 7.5 cents per mile

Southwestern Public Service Company

- New Mexico Retail

Comparison of Bills under Current Rates with Proposed EV Rate

Description	Monthly Bill at Current Rates	Monthly Bill at Proposed EV Rate	$ Change	% Change
Residential Service (Summer)				
0 kWh	$ 11.59	$ 11.61	$ 0.02	0.17%
250 kWh	$ 41.30	$ 41.37	$ 0.07	0.17%
500 kWh	$ 71.01	$ 71.13	$ 0.12	0.17%
750 kWh	$ 100.73	$ 100.89	$ 0.16	0.16%
900 kWh (average)	$ 118.55	$ 118.75	$ 0.20	0.17%
1,000 kWh	$ 130.44	$ 130.65	$ 0.21	0.16%
2,000 kWh	$ 249.29	$ 249.70	$ 0.41	0.16%
Residential Service (Non-Summer)				
0 kWh	$ 11.59	$ 11.61	$ 0.02	0.17%
250 kWh	$ 40.75	$ 40.81	$ 0.06	0.15%
500 kWh	$ 69.91	$ 70.01	$ 0.10	0.14%
750 kWh	$ 99.07	$ 99.21	$ 0.14	0.14%
900 kWh (average)	$ 116.57	$ 116.74	$ 0.17	0.15%
1,000 kWh	$ 128.24	$ 128.42	$ 0.18	0.14%
2,000 kWh	$ 244.89	$ 245.23	$ 0.34	0.14%
Residential Service Annualized				
0 kWh	$ 11.59	$ 11.61	$ 0.02	0.17%
250 kWh	$ 40.93	$ 41.00	$ 0.07	0.17%
500 kWh	$ 70.28	$ 70.38	$ 0.10	0.14%
750 kWh	$ 99.62	$ 99.77	$ 0.15	0.15%
900 kWh (average)	$ 117.23	$ 117.41	$ 0.18	0.15%
1,000 kWh	$ 128.97	$ 129.16	$ 0.19	0.15%
2,000 kWh	$ 246.36	$ 246.72	$ 0.36	0.15%
Residential Heat Service (Summer)				
0 kWh	$ 11.59	$ 11.61	$ 0.02	0.17%
250 kWh	$ 41.30	$ 41.37	$ 0.07	0.17%
500 kWh	$ 71.01	$ 71.13	$ 0.12	0.17%
750 kWh	$ 100.73	$ 100.89	$ 0.16	0.16%
1,000 kWh	$ 130.44	$ 130.65	$ 0.21	0.16%
1,300 kWh (average)	$ 166.09	$ 166.36	$ 0.27	0.16%
2,000 kWh	$ 249.29	$ 249.70	$ 0.41	0.16%

Southwestern Public Service Company

- New Mexico Retail

Comparison of Bills under Current Rates with Proposed EV Rate

Description	Monthly Bill at Current Rates	Monthly Bill at Proposed EV Rate	$ Change	% Change
Residential Heat Service (Non-Summer)				
0 kWh	$ 11.59	$ 11.61	$ 0.02	0.17%
250 kWh	$ 34.87	$ 34.92	$ 0.05	0.14%
500 kWh	$ 58.16	$ 58.24	$ 0.08	0.14%
750 kWh	$ 81.44	$ 81.55	$ 0.11	0.14%
1,000 kWh	$ 104.72	$ 104.87	$ 0.15	0.14%
1,300 kWh (average)	$ 132.67	$ 132.84	$ 0.17	0.13%
2,000 kWh	$ 197.86	$ 198.13	$ 0.27	0.14%
Residential Heat Service Annualized				
0 kWh	$ 11.59	$ 11.61	$ 0.02	0.17%
250 kWh	$ 37.01	$ 37.07	$ 0.06	0.16%
500 kWh	$ 62.44	$ 62.54	$ 0.10	0.16%
750 kWh	$ 87.87	$ 88.00	$ 0.13	0.15%
1,000 kWh	$ 113.29	$ 113.46	$ 0.17	0.15%
1,300 kWh (average)	$ 143.81	$ 144.01	$ 0.20	0.14%
2,000 kWh	$ 215.00	$ 215.32	$ 0.32	0.15%
Small General Service (Summer)				
0 kWh	$ 22.24	$ 22.28	$ 0.04	0.18%
500 kWh	$ 66.35	$ 66.46	$ 0.11	0.17%
800 kWh	$ 92.82	$ 92.97	$ 0.15	0.16%
1,200 kWh (average)	$ 128.11	$ 128.32	$ 0.21	0.16%
2,000 kWh	$ 198.69	$ 199.01	$ 0.32	0.16%
2,500 kWh	$ 242.81	$ 243.20	$ 0.39	0.16%
7,000 kWh	$ 639.82	$ 640.86	$ 1.04	0.16%
Small General Service (Non-Summer)				
0 kWh	$ 22.24	$ 22.28	$ 0.04	0.18%
500 kWh	$ 67.81	$ 67.90	$ 0.09	0.13%
800 kWh	$ 95.15	$ 95.28	$ 0.13	0.14%
1,200 kWh (average)	$ 131.60	$ 131.78	$ 0.18	0.14%
2,000 kWh	$ 204.50	$ 204.78	$ 0.28	0.14%
2,500 kWh	$ 250.07	$ 250.40	$ 0.33	0.13%
7,000 kWh	$ 660.15	$ 661.02	$ 0.87	0.13%

Southwestern Public Service Company

- New Mexico Retail

Comparison of Bills under Current Rates with Proposed EV Rate

Description	Monthly Bill at Current Rates	Monthly Bill at Proposed EV Rate	$ Change	% Change
Small General Service Annualized				
0 kWh	$ 22.24	$ 22.28	$ 0.04	0.18%
250 kWh	$ 67.32	$ 67.42	$ 0.10	0.15%
500 kWh	$ 94.37	$ 94.51	$ 0.14	0.15%
750 kWh	$ 130.44	$ 130.63	$ 0.19	0.15%
1,200 kWh (average)	$ 202.56	$ 202.86	$ 0.30	0.15%
2,000 kWh	$ 247.65	$ 248.00	$ 0.35	0.14%
7,000 kWh	$ 653.37	$ 654.30	$ 0.93	0.14%
Secondary General Service (Summer)				
5,500 kWh and 25 kW	$ 730.14	$ 731.33	$ 1.19	0.16%
9,500 kWh and 35 kW	$ 1,034.01	$ 1,035.69	$ 1.68	0.16%
15,500 kWh and 46 kW (average)	$ 1,395.77	$ 1,398.02	$ 2.25	0.16%
22,500 kWh and 60 kW	$ 1,836.65	$ 1,839.61	$ 2.96	0.16%
40,000 kWh and 100 kW	$ 3,086.51	$ 3,091.46	$ 4.95	0.16%
Secondary General Service (Non-Summer)				
5,500 kWh and 25 kW	$ 726.63	$ 727.65	$ 1.02	0.14%
9,500 kWh and 35 kW	$ 1,060.02	$ 1,061.47	$ 1.45	0.14%
15,500 kWh and 46 kW (average)	$ 1,481.74	$ 1,483.69	$ 1.95	0.13%
22,500 kWh and 60 kW	$ 1,979.42	$ 1,981.98	$ 2.56	0.13%
40,000 kWh and 100 kW	$ 3,381.72	$ 3,386.02	$ 4.30	0.13%
Secondary General Service Annualized				
5,500 kWh and 25 kW	$ 727.80	$ 728.88	$ 1.08	0.15%
9,500 kWh and 35 kW	$ 1,051.35	$ 1,052.88	$ 1.53	0.15%
15,500 kWh and 46 kW (average)	$ 1,453.08	$ 1,455.13	$ 2.05	0.14%
22,500 kWh and 60 kW	$ 1,931.83	$ 1,934.52	$ 2.69	0.14%
40,000 kWh and 100 kW	$ 3,283.32	$ 3,287.83	$ 4.51	0.14%
Irrigation Service (Summer)				
2,200 kWh and 10 kW	$ 235.28	$ 235.66	$ 0.38	0.16%
7,400 kWh and 32 kW (average)	$ 711.16	$ 712.31	$ 1.15	0.16%
10,000 kWh and 35 kW	$ 922.62	$ 924.10	$ 1.48	0.16%
30,000 kWh and 100 kW	$ 2,687.99	$ 2,692.32	$ 4.33	0.16%

Southwestern Public Service Company

- New Mexico Retail

Comparison of Bills under Current Rates with Proposed EV Rate

Description	Monthly Bill at Current Rates	Monthly Bill at Proposed EV Rate	$ Change	% Change
Irrigation Service (Non-Summer)				
2,200 kWh and 10 kW	$ 267.60	$ 267.97	$ 0.37	0.14%
7,400 kWh and 32 kW (average)	$ 820.76	$ 821.88	$ 1.12	0.14%
10,000 kWh and 35 kW	$ 1,075.25	$ 1,076.70	$ 1.45	0.13%
30,000 kWh and 100 kW	$ 3,148.62	$ 3,152.86	$ 4.24	0.13%
Irrigation Service Annualized				
2,200 kWh and 10 kW	$ 256.83	$ 257.20	$ 0.37	0.14%
7,400 kWh and 32 kW (average)	$ 784.23	$ 785.36	$ 1.13	0.14%
10,000 kWh and 35 kW	$ 1,024.37	$ 1,025.83	$ 1.46	0.14%
30,000 kWh and 100 kW	$ 2,995.08	$ 2,999.35	$ 4.27	0.14%
Large General Service Transmission - 69 kV (Summer)				
650,000 kWh and 1,500 kW	$ 32,838.92	$ 32,890.74	$ 51.82	0.16%
2,000,000 kWh and 3,500 kW (average)	$ 79,404.65	$ 79,528.22	$ 123.57	0.16%
4,200,000 kWh and 7,500 kW	$ 168,086.21	$ 168,347.93	$ 261.72	0.16%
5,800,000 kWh and 10,000 kW	$ 224,502.47	$ 224,852.94	$ 350.47	0.16%
Large General Service Transmission - 69 kV (Non-Summer)				
650,000 kWh and 1,500 kW	$ 38,871.34	$ 38,916.01	$ 44.67	0.11%
2,000,000 kWh and 3,500 kW (average)	$ 101,173.57	$ 101,280.45	$ 106.88	0.11%
4,200,000 kWh and 7,500 kW	$ 212,746.22	$ 212,972.16	$ 225.94	0.11%
5,800,000 kWh and 10,000 kW	$ 286,013.70	$ 286,316.47	$ 302.77	0.11%
Large General Service Transmission - 69 kV (Annualized)				
650,000 kWh and 1,500 kW	$ 36,860.53	$ 36,907.59	$ 47.06	0.13%
2,000,000 kWh and 3,500 kW (average)	$ 93,917.26	$ 94,029.71	$ 112.45	0.12%
4,200,000 kWh and 7,500 kW	$ 197,859.55	$ 198,097.42	$ 237.87	0.12%
5,800,000 kWh and 10,000 kW	$ 265,509.96	$ 265,828.63	$ 318.67	0.12%
Large General Service Transmission - 115 kV + (Summer)				
3,500,000 kWh and 6,000 kW	$ 134,348.29	$ 134,558.16	$ 209.87	0.16%
7,600,000 kWh and 12,000 kW	$ 270,216.70	$ 270,640.93	$ 424.23	0.16%
11,000,000 kWh and 18,000 kW (average)	$ 398,296.77	$ 398,927.91	$ 631.14	0.16%
20,000,000 kWh and 30,000 kW	$ 672,888.79	$ 673,957.18	$ 1,068.39	0.16%

Southwestern Public Service Company

- New Mexico Retail

Comparison of Bills under Current Rates with Proposed EV Rate

Description	Monthly Bill at Current Rates	Monthly Bill at Proposed EV Rate	$ Change	% Change
Large General Service Transmission - 115 kV + (Non-Summer)				
3,500,000 kWh and 6,000 kW	$ 173,343.42	$ 173,524.87	$ 181.45	0.10%
7,600,000 kWh and 12,000 kW	$ 355,003.02	$ 355,370.41	$ 367.39	0.10%
11,000,000 kWh and 18,000 kW (average)	$ 519,268.64	$ 519,814.53	$ 545.89	0.11%
20,000,000 kWh and 30,000 kW	$ 900,373.57	$ 901,299.87	$ 926.30	0.10%
Large General Service Transmission - 115 kV + (Annualized)				
3,500,000 kWh and 6,000 kW	$ 160,345.04	$ 160,535.97	$ 190.93	0.12%
7,600,000 kWh and 12,000 kW	$ 326,740.91	$ 327,127.25	$ 386.34	0.12%
11,000,000 kWh and 18,000 kW (average)	$ 478,944.68	$ 479,518.99	$ 574.31	0.12%
20,000,000 kWh and 30,000 kW	$ 824,545.31	$ 825,518.97	$ 973.66	0.12%
Primary General Service (Summer)				
10,000 kWh and 35 kW	$ 955.33	$ 956.88	$ 1.55	0.16%
22,000 kWh and 60 kW	$ 1,641.62	$ 1,644.27	$ 2.65	0.16%
46,000 kWh and 100 kW (average)	$ 2,782.69	$ 2,787.15	$ 4.46	0.16%
72,000 kWh and 150 kW	$ 4,173.19	$ 4,179.86	$ 6.67	0.16%
128,000 kWh and 250 kW	$ 6,990.03	$ 7,001.17	$ 11.14	0.16%
Primary General Service (Non-Summer)				
10,000 kWh and 35 kW	$ 994.41	$ 995.73	$ 1.32	0.13%
22,000 kWh and 60 kW	$ 1,793.18	$ 1,795.44	$ 2.26	0.13%
46,000 kWh and 100 kW (average)	$ 3,197.80	$ 3,201.62	$ 3.82	0.12%
72,000 kWh and 150 kW	$ 4,848.10	$ 4,853.81	$ 5.71	0.12%
128,000 kWh and 250 kW	$ 8,254.17	$ 8,263.72	$ 9.55	0.12%
Primary General Service Annualized				
10,000 kWh and 35 kW	$ 981.38	$ 982.78	$ 1.40	0.14%
22,000 kWh and 60 kW	$ 1,742.66	$ 1,745.05	$ 2.39	0.14%
46,000 kWh and 100 kW (average)	$ 3,059.43	$ 3,063.46	$ 4.03	0.13%
72,000 kWh and 150 kW	$ 4,623.13	$ 4,629.16	$ 6.03	0.13%
128,000 kWh and 250 kW	$ 7,832.79	$ 7,842.87	$ 10.08	0.13%

Southwestern Public Service Company

- New Mexico Retail

Comparison of Bills under Current Rates with Proposed EV Rate

Description	Monthly Bill at Current Rates	Monthly Bill at Proposed EV Rate	$ Change	% Change
Large Municipal and School Service (Summer)				
7,500 kWh and 30 kW	$ 778.26	$ 779.52	$ 1.26	0.16%
17,500 kWh and 65 kW (average)	$ 1,550.21	$ 1,552.72	$ 2.51	0.16%
25,000 kWh and 75 kW	$ 1,863.11	$ 1,866.11	$ 3.00	0.16%
36,000 kWh and 100 kW	$ 2,511.77	$ 2,515.81	$ 4.04	0.16%
Large Municipal and School Service (Non-Summer)				
7,500 kWh and 30 kW	$ 860.53	$ 861.63	$ 1.10	0.13%
17,500 kWh and 65 kW (average)	$ 1,655.89	$ 1,658.07	$ 2.18	0.13%
25,000 kWh and 75 kW	$ 2,068.76	$ 2,071.39	$ 2.63	0.13%
36,000 kWh and 100 kW	$ 2,832.41	$ 2,835.94	$ 3.53	0.12%
Large Municipal and School Service Annualized				
7,500 kWh and 30 kW	$ 833.11	$ 834.26	$ 1.15	0.14%
17,500 kWh and 65 kW (average)	$ 1,620.66	$ 1,622.95	$ 2.29	0.14%
25,000 kWh and 75 kW	$ 2,000.21	$ 2,002.96	$ 2.75	0.14%
36,000 kWh and 100 kW	$ 2,725.53	$ 2,729.23	$ 3.70	0.14%
Small Municipal and School Service (Summer)				
500 kWh	$ 58.86	$ 58.95	$ 0.09	0.15%
800 kWh (average)	$ 80.83	$ 80.96	$ 0.13	0.16%
1,000 kWh	$ 95.47	$ 95.63	$ 0.16	0.17%
2,000 kWh	$ 168.71	$ 168.98	$ 0.27	0.16%
Small Municipal and School Service (Non-Summer)				
500 kWh	$ 61.56	$ 61.64	$ 0.08	0.13%
800 kWh (average)	$ 85.15	$ 85.26	$ 0.11	0.13%
1,000 kWh	$ 100.88	$ 101.01	$ 0.13	0.13%
2,000 kWh	$ 179.51	$ 179.74	$ 0.23	0.13%
Small Municipal and School Service Annualized				
500 kWh	$ 60.66	$ 60.74	$ 0.08	0.13%
800 kWh (average)	$ 83.71	$ 83.83	$ 0.12	0.14%
1,000 kWh	$ 99.08	$ 99.22	$ 0.14	0.14%
2,000 kWh	$ 175.91	$ 176.15	$ 0.24	0.14%

BEFORE THE NEW MEXICO PUBLIC REGULATION COMMISSION

IN THE MATTER OF SOUTHWESTERN PUBLIC SERVICE COMPANY'S APPLICATION FOR APPROVAL OF ITS 2025-2027 TRANSPORTATION ELECTRIFICATION PLAN; PROPOSED PLAN RIDERS AND CREDIT; AND OTHER ASSOCIATED RELIEF,	)	
SOUTHWESTERN PUBLIC SERVICE COMPANY,	)	**Case No. 24-00___-UT**
APPLICANT.	)	

CERTIFICATE OF SERVICE

I certify that a true and correct copy of *Southwestern Public Service Company's Application and the Direct Testimony of Jeremiah W. Cunningham, Patrick J. Murphy, Brianne R. Jole, Stephanie N. Niemi and Alexander G. Trowbridge* was electronically sent to each of the following on this 1st day of April 2024:

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