

Southwestern Public Service Company

Contemporaneous Disclosure In Compliance with 18 C.F.R Section 358.7(a)(1)(2)

If an employee of the Transmission Provider discloses information in a manner contrary to the requirements of § 358.5(b)(1) and (2), the Transmission Provider must immediately post such information on the OASIS or Internet website.

#	Contemporaneous Disclosures
1	Xcel Energy's Wholesale Merchant Function raised a concern regarding counter scheduling across the Lamar HVDC tie. Xcel Energy Transmission plans to post the business practice associated with scheduling across the Lamar HVDC tie by the end of the month. (posted 4/11/05)
2	At approximately 11:50 A.M., central time 7/26/05, an inadvertent disclosure was made to the wholesale merchant function of Xcel Energy regarding a potential equipment problem with an autotransformer. At 5:09 P.M a posting was made on OASIS indicating that the autotransformer was removed from service during the afternoon and that the Moore County Plant unit was declared "must run". (posted 7/26/05)
3	Between approximately 12:30 pm and 2:00 pm, central time 10/3/05, in the course of discussing a proposed transaction, an SPS Transmission Operator mistakenly disclosed to an Xcel Energy Markets employee that the resulting flow on the Blackwater DC tie would be below the tie's 15MW minimum allowable flow. (posted 10/3/05)
4	<p>October 4, 2006: As a result of an administrative oversight after an organizational change, an Xcel Energy Wholesale Merchant Function employee received the weekly reports of a Transmission Function employee for three weeks in September 2006. The reports contained the following transmission information:</p> <p><u>TUCO SVC</u>: Negotiations with ABB successfully completed for purchase of the TUCO static var compensator. <u>South Georgia Substation</u>: The horizontally mounted cap and pin insulators on the main bus and the last 6 insulators on the line side disconnect switches were replaced. A total of 36 insulator stacks were replaced at this substation. This completes the cap and pin insulator work planned for this substation.</p> <p>The distribution list for the Transmission Function employee's weekly reports was corrected immediately after the error was discovered.</p>
5	<p>October 20, 2006: A Shared employee sent out a weekly activities report of recent and upcoming FERC regulatory matters to their usual distribution, which included several Wholesale Merchant Function employees. The report on 10/20/06 contained the following transmission information:</p> <p style="text-align: center;">Proposed OATT Revisions to clarify Network Transmission rights across Lamar DC tie:</p> <p>Finalized filing approach which clarifies that Network customers have access to all operating company systems for a single rate as consistent with Service Schedule E of Xcel Energy Operating Companies' Joint Operating Agreement which governs transactions between SPS and PSCo across the tie line.</p> <p>The employee was immediately reminded of the SOC No Conduit Rule, and the employee's future weekly reports will exclude non-public information on pending Xcel Energy transmission rate/tariff matters.</p>
6	On September 11, 2007, Southwestern Public Service Company discovered that as-built line drawings of transmission system switching maps were located on application servers in shared folders that could potentially be accessed by wholesale merchant function (WMF) employees of SPS if the WMF personnel had the specialized software necessary to read the diagrams. The files are of no commercial value to the WMF employees. As of September 14, 2007, access to the folders has been restricted to prevent WMF employee access.

VERSION 021**Date Posted:** 03/13/2025

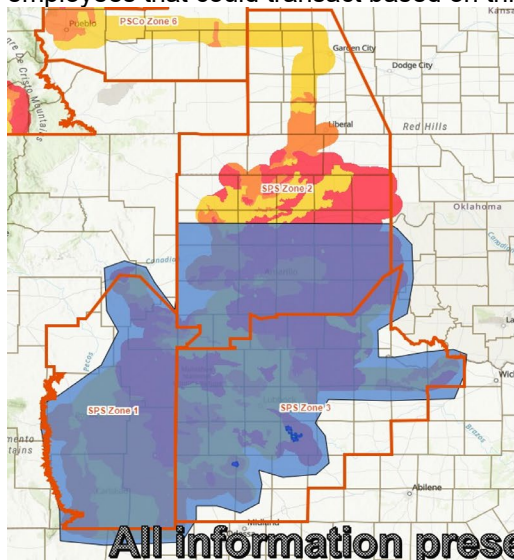
7	<p>On September 18, 2008, the SPS Transmission Function conducted a conference call with the Xcel Energy wholesale merchant function to discuss the scheduled outage of the Lamar HVDC converter. (The outage schedule is posted on OASIS, and a notice of the conference call was similarly posted on OASIS.) During the conference call, the following information was disclosed:</p> <p>The Lamar HVDC tie will be unavailable due to maintenance and testing. The outage is necessary to replace a component of the HVDC converter. During the outage, it will not be possible to place the HVDC converter and Tie Line to Southwestern Public Service Company (SPS) in service temporarily, even in the event of an emergency condition on the PSCo or SPS systems.</p> <p>SPS considers this information reliability information, but is making this contemporaneous disclosure to facilitate comparable information access.</p>
8	<p>On October 1, 2008 at about 3:00 PM CDT, an SPS transmission operator mistakenly notified an Xcel Energy wholesale merchant function operator that a third party's 20 MW generator had tripped off line. SPS does not purchase the output of the generator. About an hour later, the same employee mistakenly notified the same Xcel Energy wholesale merchant function operator that the 20 MW third party generator had returned to service. The SPS transmission operator has been reminded that such third party generation information may not be disclosed to Xcel Energy wholesale merchant function employees. (Posted 10/1/2008)</p>
9	<p>SPS is a party to interconnection agreements with El Paso Electric Company (EPE) and Public Service Company of New Mexico (PNM) related to, among other things, the Eddy County HVDC tie between the SPS and EPE/PNM transmission systems. EPE/PNM own the Eddy County HVDC facilities, but SPS operates the facilities. SPS is contemplating termination of the operation and maintenance arrangements with EPE/PNM for the Eddy County HVDC facility in September 2009. On November 20, 2008, a Transmission Function employee of SPS inadvertently disclosed to an SPS Wholesale Merchant Function employee that SPS Transmission is contemplating not extending the Eddy County HVDC operating arrangements with EPE/PNM beyond September 2009. SPS is uncertain if the information disclosed regarding the possible termination of the operating agreement is non-public transmission information, but is posting this contemporaneous disclosure out of an abundance of caution.</p>
10	<p>On April 7th, a Service Company employee inadvertently cc: a wholesale merchant function employee on an email chain that discussed the status of CT/PT replacement associated with the Hobbs County plant and the expected in-service date for the replacement devices of May 15, 2010.</p>
11	<p>On January 24, 2011, the Balancing Area Operator was attempting to call the SPP Reliability Coordinator to inform him of a transmission outage on the SPS system that would limit the imports to 255 MW on the Tuco to Okla Union transmission line. This line was out of service for eight minutes. The Balancing Area Operator inadvertently hit the speed dial button for the SPS Marketer instead of the SPP Reliability Coordinator. In his haste to report the event he told the Marketer that answered the phone about the outage before he realized his error. He asked the Marketer to disregard the conversation and he then called the SPP Reliability Coordinator for the proper reporting.</p>
12	<p>On Monday, June 20, 2011, an employee in the Xcel Energy IT department inadvertently sent a Wholesale Merchant Function (WMF) employee a data file that contained the previous 14 hours of data that included the transmission loads on the SPS system. This file was opened by the WMF employee, who realized he should not have been sent the transmission information, and the WMF employee immediately closed the electronic file and did not use the information. The WMF employee promptly contacted the Standards of Conduct chief compliance officer so the inadvertent disclosure contemporaneous could be posted.</p>
13	<p>On June 27, 2012, an employee in the Xcel Energy IT department erroneously added a third party's generator data to a generation report that is viewable by the Southwestern Public Service Company (SPS) Wholesale Merchant Function (WMF). The third party generator is located within the SPS balancing authority and recently began generating. The information added included hourly output of the generator for a historical day; real time information was not provided. An SPS WMF employee sent an email to the Xcel Energy IT department on June 28, 2012, stating that WMF personnel were able to see the historic third party generation data, and asking that the error be corrected. The report was updated to remove the third party data on the morning of July 4, 2012. Although it is not clear the information temporarily accessible by the SPS WMF involves non-public transmission information, SPS is making</p>

VERSION 021**Date Posted:** 03/13/2025

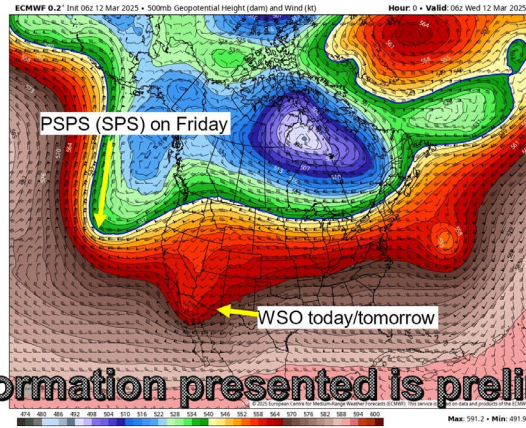
	<p>this contemporaneous disclosure out of an abundance of caution. SPS personnel also notified the affected generator of the issue and SPS' corrective actions on July 5, 2012, contemporaneous with this disclosure.</p>
14	<p>On November 5, 2013 at approximately 5 p.m. CPT, the SPS Balancing Authority (BA) operator disclosed the availability status of a third party's generation unit to an Xcel Energy Services Inc. (XES) commercial operations dispatcher classified as a wholesale merchant function employee. The disclosure indicated the third party generation was released for dispatch. The XES merchant dispatcher stated that he no longer dispatches generation on the SPS system, but instead dispatches on another Xcel Energy operating company system. The SPS BA operator immediately informed the third party by telephone that the BA operator had erroneously disclosed the third party information to an XES merchant function employee. The BA operator asked the third party if the third party wanted SPS to make an OASIS posting. The third party responded that they weren't going to ask for a posting, but that if it is SPS's procedure to make the posting, the go ahead and make the posting. SPS is making this contemporaneous disclosure out of an abundance of caution.</p>
15	<p>On August 11, 2015, an Xcel Energy Merchant Function employee was copied on an email that contained outage information for generation on the SPS system that is not owned by the company and that SPS is experiencing voltage issues in the Lubbock to Denver City area. The WMF employee promptly contacted the Xcel Energy Standards of Conduct chief compliance officer regarding the inadvertent disclosure. Since it is unclear if this disclosure is subject to 18 CFR 358.7(h)(2), SPS is making the posting out of the abundance of caution.</p>
16	<p>On November 19, 2015, an Xcel Energy Merchant Function employee was copied on an email that contained customer specific information about the proposed interconnection of a new generation project to a third party system interconnected to the SPS transmission system. Later that same day, the customer submitted a signed Voluntary Written Consent allowing Merchant Function access to information about the generation project. This inadvertent disclosure was reported promptly to the Xcel Energy Standards of Conduct chief compliance officer. Although it is unclear if this disclosure is subject to 18 CFR 358.7(h)(2), since the interconnection is not to the SPS transmission system, SPS is making the contemporaneous disclosure out of the abundance of caution.</p>
17	<p>On February 16, 2017, an Xcel Energy Merchant Function employee discovered she was able to view CPNode load data in OATI that would not be made public until the next day. The employee notified EMS Control. The EMS programmer immediately took down the display. The programmer determined that the screen data filter that restricted which data was visible had reset itself, thereby allowing the Merchant Function employee to see all CPNode data. The programmer resolved the issue and reinitiated the system. A total of two Merchant Function employees saw the data before the issue was resolved. No action was taken by either employee as a result of viewing the data. SPS is making this contemporaneous disclosure out of an abundance of caution.</p>
18	<p>On February 28, 2018, it was discovered that two Xcel Energy Services Inc. employees classified as Marketing Function employees had authorized access to two Xcel Energy computer applications that contain non-public transmission function information. The two employees had been granted access to the computer applications while in previous, non-Marketing Function positions, and access had not been removed when the employees transferred to their Marketing Function roles. Once discovered, access to the computer applications for one employee was promptly removed. Access for the other employee was inadvertently not removed until May 2, 2018. Both employees confirmed that they did not access the computer applications after they became Marketing Function employees. XES believes no non-public transmission function information was accessed after the two employees moved into a Marketing Function role, and no non-public transmission function information was shared with or accessed by Marketing Function employees. XES is posting this disclosure out of an abundance of caution.</p>
19	<p>On January 23, 2019, it was discovered that a new Xcel Energy Services Inc. employee classified as a Marketing Function employee had been inadvertently granted access to an Xcel Energy computer application that contains non-public transmission function information. The employee was granted access to the portion of a computer application containing non-public transmission information at approximately 9:00 a.m. MST. The Marketing Function employee accessed the system about 9:10 a.m. MST, immediately notified the application manager that the employee was able to view transmission information, and closed the application. Access was removed at 9:12 a.m. MST. XES believes no non-</p>

VERSION 021**Date Posted:** 03/13/2025

	public transmission function information was shared with or accessed by any other Marketing Function employees. XES is posting this disclosure out of an abundance of caution.
20	On Friday, November 9, 2018, a restricted folder containing certain Non-Public Transmission Information was incorrectly archived to an electronic file location on a shared drive that did not have the proper folder access restrictions assigned. The archive folder was accessible by any employee. The following Monday, November 12, 2018, an analyst discovered the error and requested that the permissions for the folder be changed. On November 15, 2018, the permissions for the archived folder were modified to limit access to the folder to Transmission Function employees. There is no evidence that Merchant Function employees accessed the Non-Public Transmission Information while the proper access restrictions were not in place. This posting is being made out of an abundance of caution.
21	On May 7, 2020, an Xcel Energy Services Inc. employee emailed a Merchant Function employee and the email revealed the following information: Transmission Planning Sr. Engineer: We have a light load case with all three Harrington's on at full output. This is causing the Nichols-Grapevine-Wheeler 230 kV circuits to overload in the Base case. What would you & SPP typically do in real-time to remedy this situation? Would the conventional response be to turn off one of the Harrington units and bring on a Cunningham, Maddox, Jones, or Plant X ? Particularly due to current steam NG unit's costs compared to the steam coal unit's cost. Or would it be something else? The Merchant Function employee was instructed to delete the email and confirmed that he did not transact based on this information. The transmission employee was reminded of the requirement to not provide Non-Public Transmission Information to Merchant Function employees.
22	On Monday 2/15/21 at 10:36 am, SPS Transmission shared Golden Spread Electric Cooperative information about gas shortages on their Mustang, Antelop, and Elk natural gas units with Xcel Energy Merchants during a suspended FERC Standards of Conduct period due to an EEA3 event. Gas shortages were wide spread.
23	On Tuesday 2/16/21 at 06:30 am, SPS Transmission shared tieline information with Xcel Energy Merchants during an EEA3 load shed event. The FERC Standards of Conduct were suspended during this load shed event.
24	On April 7, 2021, it was discovered that an Xcel Energy Services Inc. employee classified as a Marketing Function employee had unauthorized access to nine Xcel Energy computer applications that contain non-public transmission function information. The employee had been granted access to the computer applications while in a previous, non-Marketing Function, position and access was not removed when the employee transferred to the Marketing Function role on April 1, 2021. Once the compliance team discovered this unauthorized access the applications were removed immediately. The Marketing Function employee has confirmed that he did not access the computer applications after becoming a Marketing Function employee. Further, during this brief 7-day window the employee was in training and not trading. XES believes no non-public transmission function information was accessed after the employee moved into a Marketing Function role and no non-public transmission function information was shared with or accessed by other Marketing Function employees. XES is posting this disclosure out of an abundance of caution.
25	On Wednesday April 28, 2021, a SPS Transmission Function employee sent an email containing non-public transmission information regarding transmission and generator outages with two Xcel Energy Wholesale Market Function (WMF) employees. After sending the email the SPS Transmission Function employee realized the mistake and recalled the message in Microsoft Outlook. The WMF employees were then promptly directed by leadership to delete any copies they might have. The Merchant Function employees confirmed to the Xcel Energy Standards of Conduct chief compliance officer that they did not open or read the email. The Transmission Function employee received a verbal reminder from Compliance personnel regarding the requirements of the Standards of Conduct rules.
26	On August 20, 2021, an internal audit identified that Wholesale Market Function (WMF) employees had access to historic customer load information for a former wholesale customer. The contract with the customer expired on May 31, 2019, but the information was still accessible by WMF personnel. The customer had signed a voluntary written consent in 2004 to allow WMF employees access to the information, and the customer consent did not have a termination date. The customer information has

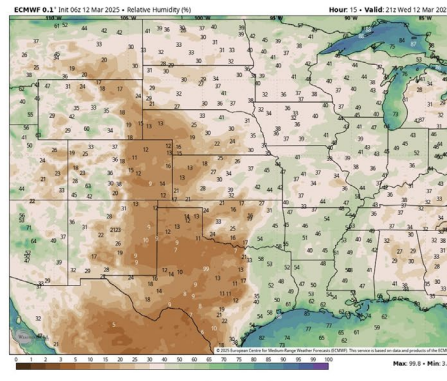
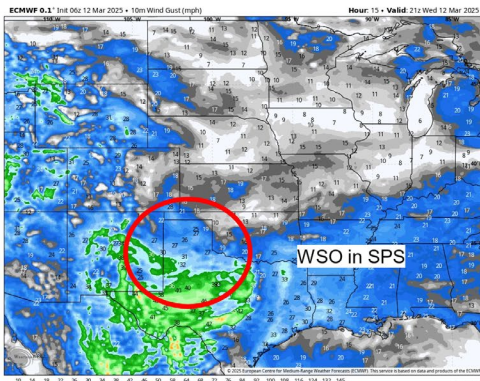
	<p>since been removed from systems accessible to WMF employees and a process is being implemented to identify any expired customer contracts in a timely manner. XES believes no action was taken by the WMF employees as a result of having access to the customer data. XES is posting this disclosure out of an abundance of caution.</p>
27	<p>On Thursday October 10, 2024, a facility operations manager forwarded an email containing non-public transmission information regarding transmission outages to an Xcel Energy Wholesale Market Function (WMF) employee revealing the following information:</p> <p style="padding-left: 40px;">There is planned transmission work at the Crossroads switch yard located near Elida, NM from November 15 to February 26 which will limit the output of the Crossroads switch yard to 605 MW.</p> <p>The Merchant Function employee was instructed to delete the email and confirmed that he did not transact based on this information. Additionally, upon further investigation, the outage information revealed through the email was out-of-date. The facility operations employee was reminded of the requirement to not provide Non-Public Transmission Information to Merchant Function employees.</p> <p>Subsequently, SPS updated the outage submission through CROW based on updated construction timelines and the updated outage was publicly posted on the SPP OASIS.</p>
28	<p>On Wednesday March 12, 2025, three meteorologists classified as Merchant Function employees attended a Wildfire meeting where upcoming Public Safety Power Shutoff (PSPS) and Wildfire Safety Operations (WSO) events were discussed. Slides from the presentation identified regions being evaluated for potential implementation of PSPS and WSO operations. Those slides are included in this notice below. The Merchant Function meteorologists were also instructed to delete any presentation material they may have saved and to not communicate the information with any other Merchant Function employees that could transact based on this information.</p> <div data-bbox="219 976 730 1533"></div> <p style="text-align: center;">Timing and Duration Friday March 14, 2025</p> <p>Time of PSPS Event for March 14, 2025</p> <ul style="list-style-type: none">o 1000 hrs CDT-1700 hrs CDTo 0900 hrs MDT-1600 hrs MDT <p>Duration: 7 Hours</p> <p>Note: Blue shaded area indicates regions being evaluated for potential Public Safety Power Shutoffs.</p> <p style="text-align: center;">All information presented is preliminary.</p>

Large Scale picture



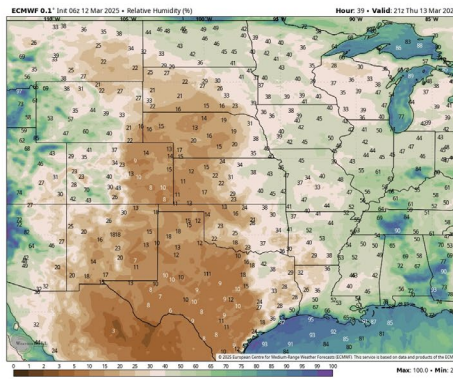
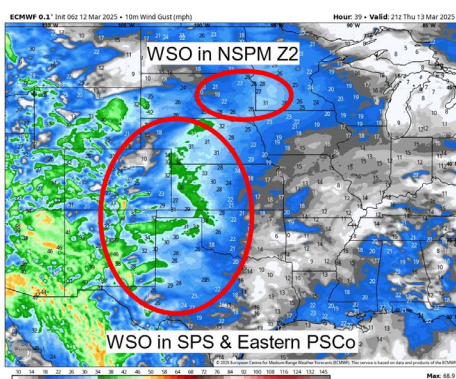
All information presented is preliminary.

Wind & RH forecast: Wednesday 3/12 (today)



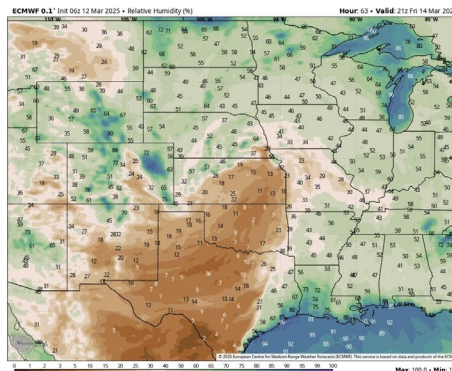
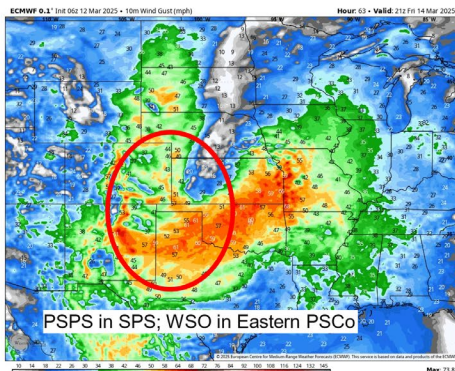
All information presented is preliminary.

Wind & RH forecast: Thursday 3/13 (tomorrow)



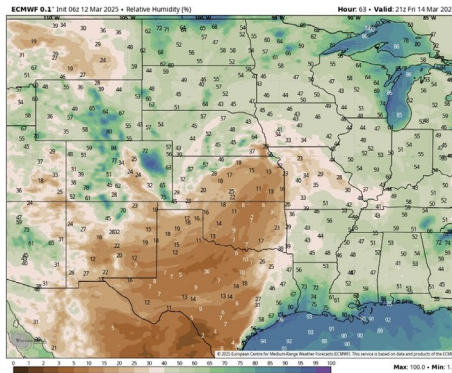
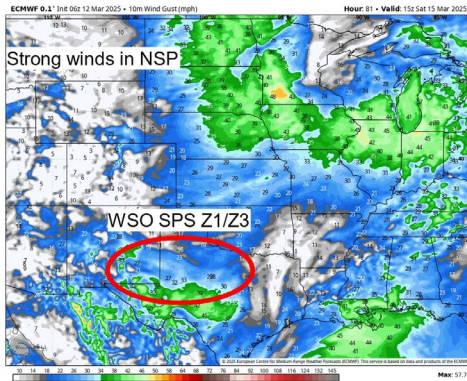
All information presented is preliminary.

Wind & RH forecast: Friday 3/14



All information presented is preliminary.

Wind & RH forecast: Saturday 3/15



All information presented is preliminary.

29 SPS has determined that an IT system used by marketing function employees has the ability to access certain CEII regarding real-time system information. SPS has implemented procedural controls to prevent any such access from occurring and is working with the vendor to implement a permanent technical solution.