



Control Number: 49737



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SOAH DOCKET NO. 473-19-6862
PUC DOCKET NO. 49737

RECEIVED
2019 SEP 30 PM 2:45
PUBLIC UTILITY COMMISSION
STATE OF TEXAS

APPLICATION OF SOUTHWESTERN §
ELECTRIC POWER COMPANY FOR §
CERTIFICATE OF CONVENIENCE §
AND NECESSITY AUTHORIZATION §
AND RELATED RELIEF FOR THE §
ACQUISITION OF WIND §
GENERATION FACILITIES §

BEFORE THE STATE OFFICE
OF
ADMINISTRATIVE HEARINGS

SOUTHWESTERN ELECTRIC POWER COMPANY'S SUPPLEMENTAL RESPONSE TO
TEXAS INDUSTRIAL ENERGY CONSUMERS' SECOND REQUEST FOR INFORMATION

SUPPLEMENTAL RESPONSE NO. TIEC 2-4

SEPTEMBER 30, 2019

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**SOUTHWESTERN ELECTRIC POWER COMPANY'S SUPPLEMENTAL RESPONSE TO
TEXAS INDUSTRIAL ENERGY CONSUMERS' SECOND REQUEST FOR INFORMATION**

Question No. TIEC 2-4:

Please explain why SWEPCO limited the RFP to build-own-transfer projects and did not request proposals for wind purchase power agreements (PPAs). Please provide all analyses, presentations, and internal correspondence regarding SWEPCO's decision to pursue build-own-transfer projects instead of PPAs.

Response:

The information responsive to this request is CONFIDENTIAL under the terms of the Protective Order. The Confidential information is available for review at the Austin offices of American Electric Power Company (AEP), 400 West 15th Street, Suite 1520, Austin, Texas, 78701, (512) 481-4562, during normal business hours.

As discussed on pages 13-14 of the Direct Testimony of Company witness Brice, ownership of wind generating facilities will provide several benefits to the Company and its customers, as compared to adding more wind PPAs. For example, ownership enables the Company to respond to changes in the market, to effectively manage congestion risk, to potentially run the facilities beyond their estimated useful life, and to offer the guarantees described by Company witnesses Brice and Smoak.

Subject to the Company's previously-filed privilege objection, documents responsive to this request are provided in TIEC 2-4 Confidential Attachment 1.

Supplemental Response No. TIEC 2-4:

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On September 25, 2019 the Company was order to produce privilege log items 15, 16, and 19 through 37 in response to TIEC 2-4.

Please see TIEC 2-4 Confidential Supplemental Attachment 2.

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