



Control Number: 49737



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

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

**TEXAS INDUSTRIAL ENERGY CONSUMERS’
NINTH REQUEST FOR INFORMATION TO SWEPCO**

Pursuant to 16 T.A.C. § 22.144, Texas Industrial Energy Consumers (“TIEC”) requests that Southwestern Electric Power Company (“SWEPCO”) provide all of the information requested in Exhibit “A” within the time frame specified under the procedural rules.

Pursuant to 16 T.A.C. § 22.144(c)(2), TIEC further requests that answers to the requests for information be made under oath. Each answer should identify the person responsible for preparing that answer (other than the purely clerical aspects of its preparation) and the name of the witness in this proceeding who will sponsor the answer and who can vouch for its accuracy. In producing documents pursuant to this request for information, please indicate the specific request(s) to which the document is being produced. These requests are continuing in nature, and should there be, for any reason, a change in circumstances which would modify or change an answer supplied by you, such changed answer should be submitted immediately as a supplement to your original answer pursuant to 16 T.A.C. § 22.144(i). Please answer each request and sub-request in the order in which they are listed and in sufficient detail to provide a complete and accurate answer to the request. TIEC further requests that each item of information be made available as it is completed, rather than upon compilation of all information requested.

All information responsive to the requests on the attached Exhibit “A” should be sent to the following persons via overnight courier, on a piecemeal basis as individual items become available:

Mr. Rex D. VanMiddlesworth
Mr. Benjamin Hallmark
Mr. James Zhu
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DEFINITIONS AND INSTRUCTIONS

“SWEPCO” refers to Southwestern Electric Power Company, and its affiliates, subsidiaries, and any person acting or purporting to act on their behalf, as it relates to the true-up proceeding and related appeals, including without limitation, attorneys, agents, advisors, investigators, representatives, employees or other persons.

“AEP” refers to American Electric Power, and its affiliates, subsidiaries, and any person acting or purporting to act on their behalf, including without limitation, attorneys, agents, advisors, investigators, representatives, employees or other persons.

The terms “document” or “documents” are used in their broadest sense to include, by way of illustration and not limitation, all written or graphic matter of every kind and description whether printed, produced or reproduced by any process whether visually, magnetically, mechanically, electronically or by hand, whether final or draft, original or reproduction, whether or not claimed to be privileged or otherwise excludable from discovery, and whether or not in your actual or constructive possession, custody, or control. The terms include writings, correspondence, telegrams, memoranda, studies, reports, surveys, statistical compilations, notes, calendars, tapes, computer disks, data on computer drives, e-mail, cards, recordings, contracts, agreements, invoices, licenses, diaries, journals, accounts, pamphlets, books, ledgers, publications, microfilm, microfiche and any other data compilations from which information can be obtained and translated, by you if necessary, into reasonably usable form. “Document” or “documents” shall also include every copy of a document where the copy contains any commentary or notation of any kind that does not appear on the original or any other copy.

Pursuant to Rule 196.4 of the Texas Rules of Civil Procedure, TIEC specifically requests that any electronic or magnetic data (which is included in the definition of “document”) that is responsive to a request herein be produced on CD-Rom in a format that is compatible with Microsoft, Macintosh and/or Word Perfect and be produced with your response to these requests. If emails are responsive to these requests, please provide a printed copy of the entire email string. Attachments to emails should be printed or, if the attachment is an Excel or other similar file, should be provided in native format on CD-Rom.

The terms “and” and “or” shall be construed both disjunctively and conjunctively as necessary to make the request inclusive rather than exclusive.

“Each” shall be construed to include the word “every” and “every” shall be construed to include the word “each.”

“Any” shall be construed to include “all” and “all” shall be construed to include “any.”

The term “concerning,” or one of its inflections, includes the following meanings: relating to; referring to; pertaining to; regarding; discussing; mentioning; containing; reflecting; evidencing; describing; showing; identifying; providing; disproving; consisting of; supporting; contradicting; in any way legally, logically or factually connected with the matter to which the term refers; or having a tendency to prove or disprove the matter to which the term refers.

The term “including,” or one of its inflections, means and refers to “including but not limited to.”

“Relate to,” “regarding,” “concerning” and similar terms mean addressing, analyzing, referring, discussing, mentioning in any way, explaining, supporting, describing, forming the basis for, or being logically or causally connected in any way with the subject of these discovery requests.

“Provide the basis,” “state the basis,” or “explain the basis” means provide all information on or describe every fact, statistic, inference, estimate, consideration, conclusion, study, and analysis known to SWEPCO that was relied upon in support of the expressed contention, proposition, conclusion or statement.

Words used in the plural shall also be taken to mean and include the singular. Words used in the singular shall also be taken to mean and include the plural.

The present tense shall be construed to include the past tense, and the past tense shall be construed to include the present tense.

If any document is withheld under any claim of privilege, please furnish a list identifying each document for which a privilege is claimed, together with the following information: date, sender, recipients of copies, subject matter of the document, and the basis upon which such privilege is claimed.

Pursuant to P.U.C. PROC. R. 22.144(h)(4), if the response to any request is voluminous, please provide a detailed index of the voluminous material.

If the information requested is included in previously furnished exhibits, workpapers, and responses to other discovery inquiries or otherwise, in hard copy or electronic format, please furnish specific references thereto, including Bates Stamp page citations and detailed cross-references.

The term “emails” includes the entire email string and all attachments found anywhere within the email string. Please refer to paragraph “D.” regarding specific instructions for producing such items.

“Communications” refers to correspondence of any kind, including emails.

“Identify” and “describe” shall have the meaning set forth below according to the context in which the term is used:

When used in reference to an individual, shall mean to state his or her full name, present or last known residence address, business affiliation and business address, and residence and business telephone number;

When used in reference to a corporation, shall mean to state its full name, its state of incorporation, its address and its principal place of business;


When used in reference to any entity other than an individual or corporation, shall mean to state its official name, its organizational form and its address;

When used in reference to a document, shall mean to state the type of document, date, author, addressee, title, its present location, the name and address of its custodian, and the substance of the contents thereof. In lieu of identifying any document, copies thereof may be furnished; and

When used in reference to a communication, shall mean to state the form of the communication (e.g., telephone conversation, letter, telegram, teletype, telecopy, written memorandum, face to face conversation, or any other form), the date of the communication or the dates on which the communication was sent and/or received if not the same, the parties to the communication, the party who initiated it, the substance of the communication, and the present location and the name and address of the custodian if the communication was non-verbal and/or of any written memorialization of the communication.

Respectfully submitted,

THOMPSON & KNIGHT LLP

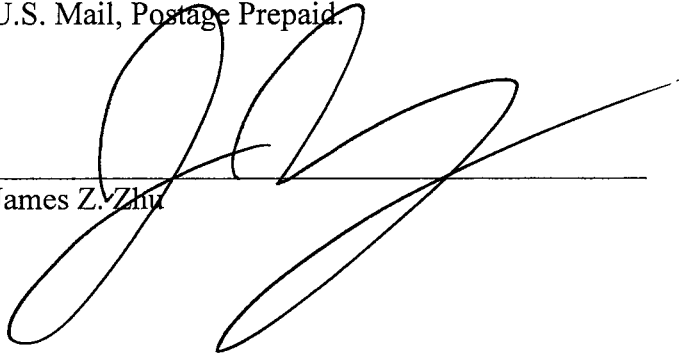


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**ATTORNEYS FOR TEXAS INDUSTRIAL
ENERGY CONSUMERS**

CERTIFICATE OF SERVICE

I, James Z. Zhu, Attorney for TIEC, hereby certify that a copy of the foregoing document was served on all parties of record in this proceeding on this 24th day of October, 2019 by facsimile, electronic mail and/or First Class, U.S. Mail, Postage Prepaid.



James Z. Zhu

EXHIBIT A

**SOAH DOCKET NO. 473-19-6862
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- TIEC 9-1** Please state all carbon tax, carbon dispatch burden, or any other carbon-related assumptions that were used in the economic modeling of the projected benefits of the North Central Energy Facilities and explain how each of those assumptions impacts the projected benefits throughout the modeling process.
- TIEC 9-2** Please state, for each case presented in this proceeding, whether the PLEXOS modeling of the expected benefits of the North Central Energy Facilities assumed that there would be a carbon dispatch burden on SWEPCO’s owned generation.
- TIEC 9-3** Has SWEPCO/AEP analyzed the probability of a carbon tax or similar carbon burden being enacted during the 2021-2051 period? If so, please provide any such analyses.
- TIEC 9-4** What is SWEPCO/AEP’s position regarding the possibility of a carbon tax or similar carbon burden being enacted during the 2021-2051 period?
- a. Who are the individual(s) at SWEPCO/AEP that are responsible for developing that position?
 - b. Please state the probability that SWEPCO/AEP believes is reasonable to assign to the possibility of a carbon tax or similar carbon burden being enacted during the 2021-2051 period.
- TIEC 9-5** Has SWEPCO/AEP analyzed the possibility of the wind production tax credit (PTC) or a similar subsidy for wind generation being reenacted during the 2021-2051 period? If so, please provide any such analyses.

- TIEC 9-6** What is SWEPCO/AEP's position regarding the possibility of the wind production tax credit (PTC) or a similar subsidy for wind generation being reenacted during the 2021-2051 period?
- a. Who are the individual(s) at SWEPCO/AEP that are responsible for developing that position?
 - b. Please state the probability that SWEPCO/AEP believes is reasonable to assign to the possibility of the wind production tax credit (PTC) or a similar subsidy for wind generation being reenacted during the 2021-2051 period.
- TIEC 9-7** Please explain how the assumed delivered cost of natural gas for SWEPCO's natural gas plants was developed for the purposes of SWEPCO's PLEXOS analysis in this proceeding.
- TIEC 9-8** Please provide, for each of SWEPCO's natural gas plants for each year in the 2021-2051 study period: (1) the relevant natural gas trading hub assumed in SWEPCO's PLEXOS analysis in this proceeding; (2) the assumed basis differential from Henry Hub to the relevant natural gas trading hub; and (3) any transportation costs.
- TIEC 9-9** Please provide a detailed explanation of how the Aurora model accounts for differences in the prices of natural gas at different trading hubs across North America. In responding, please provide, if any, the assumed basis differentials between Henry Hub and the natural gas trading hubs that are used to supply gas-fired generating units in the SPP Central area.
- TIEC 9-10** Please provide a detailed explanation of how the Aurora model accounts for differences in delivered prices to various natural gas plants across North America. In responding, please provide, if any, the assumed transportation costs for supplying gas-fired generating units in the SPP Central area.
- TIEC 9-11** Has Simon Wind conducted any backcast studies in the past five years comparing its estimated net capacity factors with actual results? If so, please provide any such studies.
- TIEC 9-12** Please provide the maximum amount of nameplate capacity of wind that PSO and SWEPCO could procure such that AEP would be able to utilize fully all generated PTCs under its forecasted future tax burden without the need for a deferred tax asset. In responding, please assume that the capacity factor of the wind facilities would be the P50 capacity factor presented in this proceeding.
- TIEC 9-13** Referring to SWEPCO's Response to TIEC 4-7, please identify with specificity the provisions in the Purchase and Sale Agreements that preclude the possibility of SWEPCO acquiring all or a portion of only the Sundance or Maverick facilities by themselves. In responding, please state whether SWEPCO would be precluded

from acquiring all or a portion of only the Sundance or Maverick facilities by themselves if SWEPCO only received CCN authorization from the Texas Commission for only the Sundance or Maverick facilities by themselves.

TIEC 9-14 Please confirm that SWEPCO is not requesting a finding as to the proper class allocation of the revenue requirement associated with the North Central Energy Facilities in this proceeding. If the answer is anything other than an unqualified “confirmed,” please explain what relief SWEPCO is requesting in this case as to the class allocation of the revenue requirement, and what impact SWEPCO believes that relief would have with respect to the establishment of rates in the future.

TIEC 9-15 Referring to the Direct Testimony of John O. Aaron, please provide the projected Generation Investment Recovery Rider rates that would result if SWEPCO’s application in this proceeding were approved as filed and the costs incurred for the North Central Energy Facilities are as projected.

TIEC 9-16 Please provide an economic analysis of the North Central Energy Facilities assuming that each of the projects have a 25-year useful life rather than a 30-year useful life.