



Control Number: 49737



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

**CITIES ADVOCATING REASONABLE DEREGULATION'S
FOURTH SET OF REQUESTS FOR INFORMATION TO
SOUTHWESTERN ELECTRIC POWER COMPANY**

Cities Advocating Reasonable Deregulation's ("CARD") Fourth Set of Requests for Information ("RFIs") to Southwestern Electric Power Company ("SWEPCO") is hereby filed in this docket. Responses to the RFIs set forth on Exhibit A should be served on Alfred R. Herrera, Herrera Law & Associates, PLLC at P.O. Box 302799, 4400 Medical Parkway, Austin, Texas 78703, within four (4) working days of service hereof or no later than **February 24, 2020**, or as modified by Order. Exhibit A is attached hereto and incorporated herein for all purposes.

DEFINITIONS

1. "SWEPCO," the "Company," and "Applicant" refer to Southwestern Electric Power Company and its affiliates.
2. "You," "yours," and "your" refer to SWEPCO (as defined above), including its directors, officers, employees, consultants, agents and attorneys.
3. "Document" and "documents" mean any written, recorded, filmed, or graphic matter, whether produced, reproduced, or on paper, cards, tapes, film, electronic facsimile, computer storage device of any other media, including, but not limited to, memoranda, notes, analyses, minutes, records, photographs, correspondence, telegrams, diaries, bookkeeping entries, financial statements, tax returns, checks, check stubs, reports, studies, charts, graphs, statements, notebooks, handwritten notes, applications, contracts, agreements, books, pamphlets, periodicals, appointment calendars, records and recordings of oral conversations, work papers, observations, commercial practice manuals, reports and summaries of interviews, reports of consultants, appraisals, forecasts, tape recordings, or any form of recording that is capable of being transcribed into written form.
4. The term "communication" includes all verbal and written communications (including written records of verbal communications) of every kind, including but not limited to, telephone calls, conferences, letters and all memoranda or other documents concerning the requested item. Where communications are not in writing, provide copies of all

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memoranda and documents and describe in full the substance of the communication to the extent that substance is not reflected in the memoranda and documents provided and to the extent it is within the knowledge of SWEPCO.

5. "Identification" of a document includes stating (a) the nature of the document (e.g., letter, memorandum, corporate minutes), (b) the date, if any, appearing thereon, (c) the date, if known, on which the document was prepared, (d) the title of the document, (e) the general subject matter of the document, (f) the number of pages comprising the document, (g) the identity of each person who signed or initialed the document, (h) the identity of each person to whom the document was addressed, (i) the identity of each person who received the document or reviewed it, (j) the location of the document, and (k) the identity of each person having custody of, or control over, the document. Identification of a document includes identifying all documents known or believed to exist, whether or not in the custody of SWEPCO or in the custody of its attorneys or other representatives or agents.
6. "Identification" of a person includes stating his or her full name, his or her most recent known business address and telephone number, his or her present position, and his or her prior connection or association with any party to this proceeding.
7. "Person" refers to, without limiting the generality of its meaning, every natural person, corporate entity, partnership, association (whether formally organized or ad hoc), joint venture, unit operation, cooperative, municipality, commission, governmental body or agency.
8. Capitalized terms not otherwise defined herein shall have the meaning attributed to them in the referenced testimony.

INSTRUCTIONS

1. If any RFI appears confusing, please request clarification from the undersigned counsel.
2. In providing your responses, please start each response on a separate page and type, at the top of the page, the RFI that is being answered.
3. As part of the response to each RFI, please state, at the bottom of the answer, the name and job position of each person who participated in any way, other than providing clerical assistance, in the preparing of the answer. If the RFI has sub-parts, please identify the person or persons by sub-part. Please also state the name of the witness in this docket who will sponsor the answer to the RFI and who can vouch for the truth of the answer. If the RFI has sub-parts, please identify the witness or witnesses by sub-part.
4. Rather than waiting to provide all of the responses at the same time, please provide individual responses as each becomes available.
5. If SWEPCO considers any RFI to be unduly burdensome, or if the response would require the production of a voluminous amount of material, please call the undersigned counsel as soon as possible in order to discuss the situation and to try to resolve the problem. Likewise, if SWEPCO objects to any of the RFIs on the grounds that the RFI seeks

proprietary information, or on any other grounds, please call the undersigned counsel as soon as possible.

6. 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, recipients of copies, subject matter of the document, and the basis upon which such privilege is claimed.
7. These requests shall be deemed continuing so as to require further and supplemental responses if SWEPCO receives or generates additional information within the scope of these requests between the time of the original response and the time of the hearings.

Respectfully submitted,

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By: Alfred R. Herrera by permission

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**ATTORNEYS FOR CITIES ADVOCATING
REASONABLE DEREGULATION**

CERTIFICATE OF SERVICE

I certify that I have served a copy of *CARD's Fourth Set of Requests for Information to SWEPCO* upon all known parties of record by fax and/or first class mail on this the 18th day of February 2020.

Mariann Wood

Mariann Wood

EXHIBIT A

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

APPLICATION OF SOUTHWESTERN	§	
ELECTRIC POWER COMPANY FOR	§	BEFORE THE STATE OFFICE
CERTIFICATE OF CONVENIENCE	§	
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**CITIES ADVOCATING REASONABLE DEREGULATION'S
FOURTH SET OF REQUESTS FOR INFORMATION TO
SOUTHWESTERN ELECTRIC POWER COMPANY**

- 4-1. For the period from January 1, 2015 through January 31, 2020, please:
- a. Provide a copy of all analyses SWEPCO has undertaken or that have been undertaken on its behalf, to ascertain customer interest in more renewable energy to meet those customers' sustainability and renewable energy goals;
 - b. Identify all customers of which SWEPCO is aware that have expressed an interest in more renewable energy to meet those customers' sustainability and renewable energy goals, and each such customer's renewable energy goals;
 - c. Provide a copy of SWEPCO's response to such customers;
 - d. State whether SWEPCO could meet such customers' sustainability and renewable energy goals through purchased power agreements for renewable energy, and if not, please explain why not.
- 4-2. Please identify any companies of which SWEPCO is aware that decided either not to locate or not to expand their operations in SWEPCO's service area in Texas, because of SWEPCO's lack of renewable energy sources, and provide the dates those decisions were made.
- 4-3. If the Commission denies SWEPCO's amendment to its certificate of convenience and necessity ("CCN") for the Wind Project but the other states in which SWEPCO is seeking approval of the Wind Project, approve the Wind Project and each such other state is allocated its proportionate share of the share that otherwise would have been allocated to Texas ratepayers, please provide a copy of all analyses undertaken by SWEPCO, or on its behalf, that show the impact on the price that ratepayers in Texas will pay for electricity from SWEPCO during the period from the first in-service date of any part of the Wind Project through the life of the Wind Project.