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

PUBLIC UTILITY §  
COMMISSION §  
BEFORE THE STATE OFFICE §  
OF §  
ADMINISTRATIVE HEARINGS §

**CARD'S LIST OF ISSUES**

The Cities Advocating Reasonable Deregulation (“CARD”) are in the process of reviewing the application filed by Southwestern Electric Power Company (“SWEPCO”) in this case, and thus, at this time, do not submit an exhaustive list of issues to be addressed in this proceeding.

However, CARD submits the following issues for consideration by the Public Utility Commission of Texas (“Commission”) in its evaluation of SWEPCO’s application:

1. Are SWEPCO’s projections related to its contention, that acquisition of the Selected Wind Facilities (“Wind Catcher II”) will reduce customers’ energy costs, defer future capacity additions, enhance renewable energy credit options for customers that desire it, and provide economic development benefits, reasonable and do they accurately predict the effects on ratepayers of adding “Wind Catcher II” to its rate base?
2. To the extent SWEPCO does not receive its projected amount of production tax credits (“PTCs”), how will SWEPCO ensure that ratepayers are kept harmless for the “short fall” in PTCs relative to SWEPCO’s projections? For example, SWEPCO projects receipt of about \$750 million in PTCs (net of its proposal to earn a return on unused PTCs); if the amount of PTCs SWEPCO receives is, e.g., \$500 million, how will SWEPCO hold ratepayers harmless for the balance of \$250 million?
3. To the extent SWEPCO’s projected reductions in customers’ energy costs, that it estimates to be about \$2.1 billion in nominal dollars and about \$588 million in net-present value, are not realized, how will SWEPCO ensure that ratepayers are kept harmless if its projected savings do not materialize?

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4. To the extent SWEPCO's projected "economic benefits" are not realized, how will SWEPCO ensure that ratepayers are kept harmless?
5. SWEPCO asserts that approval of its application will allow it to defer future capacity additions. Is the addition of Wind Catcher II, a replacement for current and/or future capacity needs?
6. Is SWEPCO's projected capital cost for Wind Catcher II reasonable?
7. Is SWEPCO's projected "minimum production guarantee" – according to SWEPCO, equivalent to a 38.1% capacity factor – reasonable?
8. If the Commission determines SWEPCO's application for Wind Catcher II is in the public interest, what universe of customer safeguards are reasonable to protect ratepayers if SWEPCO's projected savings do not materialize?
9. Does Utilities Code § 14.101 apply to SWEPCO's application?

CARD reserves the right to raise additional issues after it more fully reviews SWEPCO's application and undertakes discovery.

Respectfully submitted,

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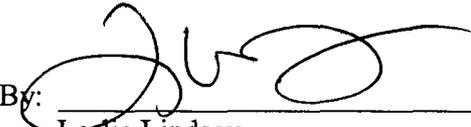
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**ATTORNEYS FOR CITIES  
ADVOCATING REASONABLE  
DEREGULATION**

**CERTIFICATE OF SERVICE**

I hereby certify that on this the 29<sup>th</sup> day of August 2019, a true and correct copy of the **CARDS** *List of Issues* was served upon all parties of record by facsimile and/or First-class mail United States mail, postage paid.

By:   
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