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PUC DOCKET NO. 28840 SOAH DOCKET NO. 473-04-103804 FEB 12 PM 3: 02

APPLICATION OF AEP TEXAS

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BEFORE THE STATE OF FILE

CENTRAL COMPANY FOR

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OF

AUTHORITY TO CHANGE RATES

S
ADMINISTRATIVE HEARINGS

AEP TEXAS CENTRAL COMPANY'S FIRST REQUEST FOR INFORMATION TO ALLIANCE FOR RETAIL MARKETS

AEP Texas Central Company ("TCC") presents its First Request for Information ("RFI") to Alliance for Retail Markets ("ARM") in the above styled docket. Responses to these RFIs should be served on Mr. Ron Ford, American Electric Power Company, 400 West 15th Street, Suite 610, Austin, Texas 78701, within seven (7) calendar days of service, as required by Order No. 3 in this docket. These requests shall be deemed to be continuing so as to require further and supplemental responses if ARM receives or generates additional information within the scope of these requests between the time of the original response and the time of the hearings.

Definitions and Instructions

- 1. "TCC" means AEP Texas Central Company and its employees, agents and representatives.
- 2. "You," "your" and "yours" refer to ARM, including ARM's employees, agents and representatives.
- 3. "ARM" means each member of the Alliance for Retail Markets participating in this case, as well as all employees, agents and representatives of ARM, both individually and collectively.
- 4. "Document" and "documents" means any written, recorded, filmed, or graphic matter, whether produced or reproduced, on paper, cards, tapes, film, electronic facsimile, computer storage device or any other media.
- 5. 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 matter in issue. To the extent the communication is not in writing, please provide a full and complete description of the substance of the communication and the persons involved in the communication.



Respectfully submitted,

Larry W. Brewer
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John F. Williams

CERTIFICATE OF SERVICE

I certify that I have served a copy of AEP Texas Central Company's First Request for Information to Alliance for Retail Markets upon all parties of record by fax on this 12 day of

<u>ኒ</u> 2004.

John H. Williams

FIRST REQUEST FOR INFORMATION TO ALLIANCE FOR RETAIL MARKETS

- TCC 1-1: For each witness presenting testimony on behalf of ARM in this proceeding, please provide the following documents. (Please identify the information separately for each witness):
 - a. all workpapers not filed with the witness's testimony;
 - b. all source documents upon which the witness relied in developing the testimony (other than TCC RFI responses);
 - c. the written testimonies filed by the witness in the five most recent rate cases in which the witness participated prior to this one;
 - d. all articles, papers, speeches, or scholarly treatises (or portions thereof) reviewed or relied upon by the witness in preparing the testimony; and
 - e. all books, papers, articles or speeches addressing utility regulatory, utility accounting, or utility ratemaking issues that the witness has authored in whole or in part in the past five years.