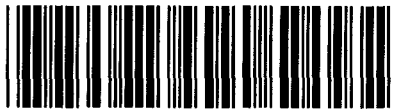




Control Number: 28840



Item Number: 509

Addendum StartPage: 0

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SOAH DOCKET NO. 473-04-1035

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APPLICATION OF AEP TEXAS  
CENTRAL COMPANY  
FOR AUTHORITY TO  
CHANGE RATES

§ BEFORE THE STATE OFFICE  
§ OF  
§ ADMINISTRATIVE HEARINGS  
§

**SECOND REQUESTS FOR INFORMATION OF CPL RETAIL ENERGY, LP  
TO AEP TEXAS CENTRAL COMPANY**

NOW COMES the CPL Retail Energy, LP ("CPL Retail"), and files its second set of Requests for Information to AEP Texas Central Company ("AEP" or "Company"). CPL Retail requests that AEP provide the information identified and to answer under oath the questions propounded on the list attached hereto. It is further requested that the responses to such questions and requests be given in the order in which they are listed and in sufficient detail to fully present all of the facts relevant thereto, and that such questions and requests be answered within three (3) working days of receipt pursuant to Order No. 3 Establishing Prehearing Procedures, Schedules, and Notice of Hearing on the Merits in the above-referenced Docket. Please copy the question immediately above the answer to each and indicate at the bottom of each answer the name and job title of each person who participated in the preparation of the answer (other than purely clerical aspects of its preparation). Please also state the name of the witness in this proceeding who will sponsor the answer to the question and who can vouch for the truth and veracity of the response given.

In producing documents pursuant to this request, AEP should number each document and indicate the specific question(s) or request(s) in response to which the document is being produced. Although certain requests herein may be overlapping in scope, they are intended to be comprehensive, not redundant. To the extent that any document falls within the scope of multiple requests, multiple productions are not contemplated; one production referencing the multiple requests will be sufficient.

If any requested document was, but is no longer, in the present possession or subject to the control of AEP, or is no longer in existence, describe each such document and state whether any such document is:

- (a) Missing or lost;
- (b) Destroyed;
- (c) Transferred to another;
- (d) Otherwise disposed of; or
- (e) Not in its possession or subject to its control, or no longer in existence, or any other reason explaining why the document is no longer in existence or in its possession and/or control.

In any of these instances, also state the surrounding circumstances, and with respect to dispositions (b), (c), or (d), identify any AEP official, representative, or employee who authorized or was responsible for such disposition, the date or best approximate date of any such disposition, and, if known, the present location and custodian of any such document.

In the event any document or information hereby requested is deemed by AEP to be of a proprietary nature, either from AEP's standpoint or from the standpoint of CPL Retail, AEP is requested to immediately contact counsel for CPL Retail in order to pursue possibilities for execution of nondisclosure agreements, entry of protective orders, or any other appropriate measures which might be necessary to fulfill legitimate interests in protecting such proprietary information from disclosure to competitors or the public generally.

Please supplement your answer as required by law.

Answer to said questions and requests should be served upon counsel for CPL Retail at the following address:

James W. Checkley, Jr.  
Jerald W. Epps  
Locke Liddell & Sapp LLP  
100 Congress Avenue, Suite 300  
Austin, Texas 78701  
(512) 305-4730, -4864  
(512) 305-4800 (FAX)  
Facsimile: (512) 305-4800

If any item of the requested information is available in computer readable format, please provide the requested data in such format pursuant to the specifications provided in the relevant requests for information. If not available in a requested format, AEP is requested to contact CPL Retail to make arrangements for delivery to CPL Retail in the most suitable alternative format reasonably available to AEP.

## DEFINITIONS

For the purpose of this request for information, the expressions set forth below shall have the following meanings:

(1) “Communications” means an oral or written exchange or transmission of words or ideas to another person or persons including, without limitation, discussions, conversations, conferences, meetings, speeches, correspondence, memoranda, statements, and questions.

(2) “Document” means any written or graphic matter, without limitation, on any medium, being of any type of description, including, without limitation, computer-readable forms such as tabulating cards and magnetic tape, now or formerly in the actual or constructive possession, custody, or control of AEP, or of which AEP has knowledge, upon which intelligence or information can be retrieved; and every copy of such writing or record where the original is not in the possession, custody, or control of AEP.

(3) “Identify,” when used in connection with an act, shall mean to state a description of the act, including the place, date, and time of its occurrence, and the identity of the person, persons, or entities that engaged in and/or witnessed the act.

(4) “Identify,” when used with reference to a “document,” shall mean to state the type of document (*e.g.*, book, magazine, article, circular, ledger, letter, memorandum, chart, computer run information, microfilm, etc.), its present location and custodian, a description of its form, title, author/addressor, addressee, subject matter, volume and page number or other means of general author/addressor, addressee, subject matter, volume and page number or other means of general

identification, approximate size and number of pages, any attachments or appendices, and the date on which it was made or prepared.

(5) "Identify," when used with reference to a natural person, shall mean to state the full name, present business address, present home address, city of residence, and the occupation of that person during the time period covered by this request for information, and the relationship, if any, of that person to AEP.

(6) "Persons" means the plural as well as the singular and includes any natural person and any firm, corporation, association, partnership, or other organization or form of legal entity.

(7) "Studies" includes any document, as defined herein, which reflects or was utilized in the collection, evaluation, analysis, summarization, or characterization of information in connection with the subject(s) referred to.

Respectfully submitted,

LOCKE LIDDELL & SAPP LLP  
100 Congress Avenue, Suite 300  
Austin, Texas 78701  
(512) 305-4730, -4719  
(512) 305-4780 (FAX)

J. Alan Holman  
State Bar No. 09903500

James W. Checkley, Jr.  
State Bar No. 04170500

Jerald W. Epps  
State Bar No. 06637900

By:   
Jerald W. Epps

ATTORNEYS FOR MOVANT,  
CPL RETAIL ENERGY, LP

CERTIFICATE OF SERVICE

I hereby certify that the foregoing has been served on all parties of record in this proceeding on this 2nd day of March, 2004, via facsimile and/or first class mail.

  
\_\_\_\_\_  
Jerald W. Epps

**SECOND REQUESTS FOR INFORMATION OF CPL RETAIL ENERGY, LP  
TO AEP TEXAS CENTRAL COMPANY**

**RFI Requests relating to the rebuttal testimony of Alan Graves:**

- 2-1 Re: Graves Rebuttal Testimony, page 8, lines 5-17. Please provide a complete copy of the Profile Data Evaluation Report provided by Regional Economic Research (RER) to ERCOT dated in or about June or July 2000 in both electronic and paper form. Sections 1, 2, and 3, and Appendix A of said Report are available, at least in part, on the ERCOT website, and these parts need not be provided in response to this Request.
- 2-2 Re: Graves Rebuttal Testimony, page 7, lines 1-13. Please provide copies of any other AEIC Load Research materials relied upon or otherwise used by AEP in reference to “borrowed” load research data, or used by AEP to compare, evaluate, or analyze the ERCOT load profiles, interval data, and load shapes.
- 2-3 Re: Graves Rebuttal Testimony, page 7, lines 9-13. Please identify, describe, and provide copies of the specific “industry-accepted guidelines” referred to by Mr. Graves as being used to support the “transfer ERCOT weather zone-specific profiles to TCC jurisdiction rate classes . . .”
- 2-4 Please provide copies of any and all other documents, manuals, books, or reference materials, used by AEP that contain reference to methods to compare, evaluate, analyze, or otherwise determine that the ERCOT load profile shapes are appropriate for use and statistically representative of TCC wires rate class load shapes and TCC native load.
- 2-5 Please provide copies of the comparisons, statistical tests, and analyses, including inputs, analysis techniques, and outputs, performed by AEP that the ERCOT data (including peak demands, coincident demands, non-coincident demands, class demands, interval data, load shape data, summary statistics, demographic and/or business ‘firmographic’ data) is representative of TCC wires rate classes and native load. Please provide any threshold criteria or standards for each comparison, test, or evaluation performed, that determines whether the results of that technique indicate the data can be used (borrowed) or cannot be used.
- 2-6 Please clarify Mr. Graves’ intended meaning to the references to ‘usage’ data throughout his testimony (l. 2, p. 6; l. 21, p. 9; l. 3, p. 10 (twice); l. 8, p.10; l. 6, p. 11; and l. 18, p. 11). Is Mr. Graves referring to kWh data only or is the reference to both kW data and load shape? Please list each reference of ‘usage’ data that refers to any other data other than strictly kWh data and list what else it refers to (i.e. peak kW data, etc.).
- 2-7 Please provide copies of the actual TCC load shape source data for each wires rate class, including any the interval data and load shape, that was used to compare to the ERCOT load shape data to support that the ERCOT load shape data is sufficiently representative of TCC actual wires rate class load shape data and that it can be used for cost allocation purposes.
- 2-8 Re: Graves Rebuttal Testimony, pages 5 and 6. Please provide the study, workpapers, and results from this “rigorous process” used to develop non-idr class load data, including

the following data by rate class, by month, by billing cycle, by weather zone, by profile type:

- a. development of the MDD,
  - b. development of the NCP,
  - c. development of the diversity factors,
  - d. development of the coincidence factors,
  - e. the coincidence factors used in the study (identify the source and vintage of each),
  - f. the “billing kW”, and
  - g. the development of the contribution to system peak.
- 2-9 Please provide the comparison shown in Mr. Graves Exhibit ARG-2R, for all TCC wires rate classes with all corresponding ERCOT profiles and zones.
- 2-10 Please provide the date and identity of the person(s) who prepared Exhibit ARG-1R and the sources used. If it is based upon notes kept by an employee, please provide the name and title of that employee and a complete copy of such notes.
- 2-11 In reference to Exhibit ARG-1R, please affirm or deny separately for each “log entry” electronic data was provided to ERCOT or RER.
- 2-12 In reference to Exhibit ARG-1R, did CPL or WTU provide actual sample point interval load data or summary statistics to ERCOT and/or RER for use in developing the ERCOT profiles. If CPL or WTU provided actual sample point interval load data, please provide a detailed description of the sample point interval data provided, including the time periods covered, the rate classes and “strats”, the “strat” expansion factors, the sample point count, the sample point replacements and time period covered by the replacements, and the population statistics covered by each sample and sample “strat”, and any documentation confirming that sample point interval data was provided.
- 2-13 Re: Graves Rebuttal Testimony, page 9, lines 1-9. Please identify by name and title each person who assisted with the preparation of the Response of American Electric Power to Request for Comments and Load Profiling and Load Research Issues filed as Item Number 15 in PUC Project No. 25516; *Load Profiling and Load Research Rulemaking*.

### **RFI Requests relating to the rebuttal testimony of Don Moncrief:**

- 2-14 Re: Moncrief Rebuttal Testimony, page 17, line 6 through page 18, line 18. Please provide copies of any and all studies, workpapers, materials, or other documentary support used to develop each of the primary and secondary allocation percentages listed in WP/Schedule II-I-1.4, referred to as the ‘distribution function field study’. Please provide the name, title, work history, and qualifications of all persons that were responsible for developing those percentages. Please provide the dates on which these percentages were developed.
- 2-15 Re: Moncrief Rebuttal Testimony, page 17, line 18 through page 18, line 18. Mr. Moncrief states that a change in method to a demand-only method was made in the late 1990s. Please provide a detailed description of the previous method used by the Company and identify the PUC Docket in which the old method was last used.
- 2-16 Re: Moncrief Rebuttal Testimony, page 18, lines 7-18. “For each description, percentages were assigned to secondary and primary voltage by the manager of distribution region support based on his or her knowledge of the TCC system.” Please identify each manager of distribution region support that assigned percentages to secondary and primary voltage, when (month and year) the assignments were made, and how long each such manager had been in that position and with the Company at the time the percentages were assigned.
- 2-17 When was the last “distribution field study” performed for the TCC/CPL service area? Identify the last PUC Docket in which such study was used. For that case, what were the FERC Account balances and fixed capital unit code balances for the accounts and codes shown in WP/Schedule II-I-1.4? For purposes of this question, a “distribution field study” is one in which the distribution system is sampled (using a statistically valid sampling technique) and the distribution equipment within that sample is inspected (usually in the field), identified, categorized by purpose, function, etc., and then the results of the sampling are used to determine, among other things, the percentage splits between primary and secondary.
- 2-18 Re: Moncrief Rebuttal Testimony, page 19, lines 20 through page 20, line 20. For how long will the 1998 loss analysis study results be valid for use in costing studies? At what point (please specify the year) does the 1998 loss study become stale and need to be updated for costing studies?
- 2-19 Re: Moncrief Rebuttal Testimony, page 19, line 20 through page 20, line 20; page 21, lines 5-11. Mr. Moncrief testifies that the ERCOT Settlement Interval Loss Factors (SILFs) are based on the 1998 loss analysis study. For how long will the 1998 loss analysis study results be valid for purposes of its use as ERCOT SILFs? At what point (please specify the year) will the 1998 loss analysis study become stale and need to be updated for ERCOT SILFs?