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**SOAH DOCKET NO. 473-07-0833
DOCKET NO. 33309**

**APPLICATION OF AEP TEXAS § BEFORE THE STATE OFFICE
CENTRAL COMPANY FOR §
AUTHORITY TO CHANGE RATES § OF ADMINISTRATIVE HEARINGS**

**SOAH DOCKET NO. 473-07-0851
DOCKET NO. 33310**

**APPLICATION OF AEP TEXAS § BEFORE THE STATE OFFICE
NORTH COMPANY FOR §
AUTHORITY TO CHANGE RATES § OF ADMINISTRATIVE HEARINGS**

**TEXAS LEGAL SERVICES CENTER AND TEXAS RATEPAYERS' ORGANIZATION
TO SAVE ENERGY'S FIRST REQUEST FOR INFORMATION TO AEP TEXAS
CENTRAL COMPANY AND AEP TEXAS NORTH COMPANY**

NOW COMES Texas Legal Services Center ("TLSC") and Texas Ratepayers' Organization to Save Energy ("Texas ROSE"), in the above referenced dockets, and files their First Request for Information ("RFI") to AEP Texas Central Company ("TCC") and AEP Texas North Company ("TNC"), pursuant to PUC PROC. R. 22.141-22.145. TLSC and Texas ROSE hereby request that TCC and TNC please provide the information requested herein in accordance with the instructions provided.

Respectfully Submitted:
Randall Chapman, Bar No. 04129800
Neish A. Carroll, Bar No. 00795282
Texas Legal Services Center
815 Brazos, Suite 1100
Austin, Texas 78701
Telephone: (512) 477-6000
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By: 

Randall Chapman

Certificate of Service

I, Randall Chapman, certify that on this 27th day of December, 2006, I served a true copy of this document on all parties of record by facsimile transmission.



Randall Chapman

Definitions

1. "AEP TCC", "TCC", the "Company", and "Applicant" refers to AEP Texas Central Company and its affiliates, and all officers, directors, employees, consultants, agents and attorneys, individually and collectively, of AEP Texas Central Company and its affiliates.
2. "AEP TNC", "TNC", the "Company", and "Applicant" refers to AEP Texas North Company and its affiliates, and all officers, directors, employees, consultants, agents and attorneys, individually and collectively, of AEP Texas North Company and its affiliates.
3. "You" or "yours" refers to the entity or entities to which this request for information is directed and, if applicable, its officers, directors, elected officials, employees, agents, attorneys, or consultants working directly or indirectly with the entity.
4. "Document" or "documents" mean any written, recorded, filmed or graphic matter, whether prepared by you or, if applicable, by your officers, directors, employees, consultants or any parent, subsidiary or affiliated entity, or by any other person that is in the possession, custody or control of you or, if applicable, by your officers, directors, employees, consultants or any parent, subsidiary or affiliated entity. The term document includes, but is not limited to: analyses; agreements; contracts; letters; telegrams; e-mail; memoranda; correspondence; notes, handwritten or otherwise; notebooks; scrapbooks; surveys; date books; records; interoffice communications; reports; summaries; outlines; studies; drafts; instructions; specifications; plans; drawings; sketches; blueprints; diagrams; photographs; photocopies; charts; graphs; workpapers; descriptions; books; pamphlets; personal telephone directories or messages; visitor logs; calendar or diary entries; business cards; minutes of meetings, conferences; records and recordings of telephone or other oral conversations; bills; invoices; purchase orders; bills of lading; published or unpublished speeches or articles; publications; indices; transcripts; bookkeeping entries; financial statements; tax returns; checks; check stubs; receipts; microfilm; microfiche; computer disc or tape; computer storage; computer print-outs; computer records; audio or video tapes; and all reproductions, copies or drafts of any of item requested that are not identical to the original(s). The term document also includes electronically stored messages, records and data from which information can be obtained either directly or through detection devices or readers, and such documents must be produced in a usable and legible form. In all cases where documents are requested, the discovery request includes (and your responses should also include) copies of all attachments, enclosures, exhibits, errata, addenda, transmittal memoranda, routing slips, etc. which are associated with the document that was requested.
5. "Study" includes any document, as defined above, which records, reflects or was used in the collection, evaluation, analysis, summarization or characterization of information in connection to the subject referred.
6. "Workpaper" includes any document, as defined above, which records, reflects, or was used in the collection, evaluation, analysis, summarization or characterization of information presented in testimony or other filings, or any study, as defined above, whether or not filed.

Instructions

1. Please answer the attached questions and sub-questions under oath, in the order in which they are listed, and in sufficient detail to present fully all of the relevant facts. In answering these questions, furnish all information that is available to you, including information in the possession of your agent, employees, and representatives, all others from whom you may freely obtain it, and your attorneys and their investigators. Please answer each question based upon your knowledge, information, or belief, and any answer that is based upon information or belief should state that it is given on that basis. Rather than waiting to provide all of the responses at the same time, please provide individual responses as each becomes available. These questions are continuous in nature. If there is a change in circumstances that would modify an answer supplied by you, submit your modified answer, under oath, as a supplement to your original answer.
2. In providing your responses, please start each response on a separate page and type, at the top of the page, the question that is being answered. Where a request for information contains more than one subpart, separate responses should be provided to each subpart.
3. Please state the name of the witness in this docket who will sponsor the answer to the question and who can vouch for the truth of the answer.
4. Where a request for information requests the identification of a person or persons, such identification shall include the person's full legal name(s), complete current business address(es), complete current business telephone number(s), and complete current job description(s) and title(s).
5. If any document or information requested is a computer program, data run or printout, please provide both a printed copy and a machine-readable copy of all software and data used and produced by the computer. State the machine-readable format in which the information is available and describe the type of computer and software, or other machinery, required to read the information.
6. Where a response to a question includes a reference to or the production of work performed by a consultant or an affiliate, please identify the individuals employed by the consultant or affiliate responsible for that work.
7. If any document is withheld under 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.
8. If TCC or any of TCC's attorneys does not have possession, custody, or control of the originals of the documents requested, please produce copies that are in the possession, custody or control, however made, of TCC or any of TCC's attorneys. If any document requested is not in your possession or subject to your control, please explain why not, and give the present location and custodian of any copy or summary of the document.

9. If TNC or any of TNC's attorneys does not have possession, custody, or control of the originals of the documents requested, please produce copies that are in the possession, custody or control, however made, of TNC or any of TNC's attorneys. If any document requested is not in your possession or subject to your control, please explain why not, and give the present location and custodian of any copy or summary of the document.
10. If you consider any question to be 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 accommodate compliance with these requests. Likewise, if you object to any of the questions on the grounds that the question seeks proprietary information, or on any other grounds, please call the undersigned counsel as soon as possible.

Please submit all information requested to counsel for TLSC and Texas ROSE:

Randall Chapman
Neish A. Carroll
Texas Legal Services Center
815 Brazos St., Suite 1100
Austin, TX, 78701

TLSC AND ROSE'S FIRST RFI TO AEP TCC AND AEP TNC

SOAH DOCKET NO. 473-07-0833 & SOAH DOCKET NO. 473-07-0851

DOCKET NO. 33309 & DOCKET NO. 33310

The following questions are directed to both AEP TCC and AEP TNC. At the beginning of each response, please indicate the name of the company or companies to which the answer applies:

1. The testimony of Billy G. Berny (page 7, starting at line 14) briefly describes TCC's and TNC's cost recovery recommendations. Please provide additional information to describe what is meant by a "timely cost recovery factor, subject to a reconciliation of the actual prudent and reasonable costs expended and revenues collected in connection with energy efficiency programs."
2. Please provide an explanation and supporting evidence as to why TCC's and TNC's cost recovery recommendation is reasonable and necessary.
3. Please provide data to describe how TCC's and TNC's energy efficiency expenditures and energy savings will change in the future if the Company's cost recovery proposal is accepted by the Commission.
4. Please provide data on retail electricity prices in the TCC and TNC service areas. Please provide data on average residential retail rates and small commercial rates for the years 2001 through 2006.
5. Have the marketing activities of energy efficiency service providers changed as electricity prices have increased? Are more customers investing in energy efficiency because of increased electricity prices? If yes, how have the numbers changed?
6. How do rising electricity prices change the economics of energy efficiency investments for residential consumers?
7. How have electricity prices changed for large commercial and industrial customers in the TCC and TNC service areas?
8. Have the marketing activities of energy efficiency service providers changed with changes in commercial and industrial electricity prices? Are more customers investing in energy efficiency because of higher electricity prices? If yes, how have the numbers changed?
9. If a customer is interested in working with a TCC or TNC standard offer participant, how does the customer go about the process? Please provide any information provided to consumers that explains the process.
10. Mr. Berny's testimony (Docket No. 33309, page 10, line 1; Docket No. 33310, page 10 line 5) states that REPs have not participated in TCC's or TNC's standard offer programs. Do any of the REPs serving the TCC or TNC service area offer an energy efficiency program that is independent of TCC's or TNC's energy efficiency plan? If so, please describe the program(s).

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11. Please provide a copy of the current agreement entered into by standard offer contractors for the residential standard offer program.
12. Please provide a copy of the current agreement entered into by standard offer contractors for the residential Hard to Reach program.
13. Mr. Berny's testimony (Docket No. 33309, page 11, line 16 and Docket No. 33310, page 11, line 19) discusses cost effectiveness of energy efficiency programs. Mr. Berny's testimony implies that the program only has to be cost effective to the utility. Does TCC or TNC allow energy efficiency service providers to promote investments to residential ratepayer that may benefit the utility but increase costs to the consumer?
14. Please provide a list of any measure that would or possibly could provide a savings to the utility but increase costs for the consumer.
15. Please provide data to estimate the number of customers in each of the customer classes referenced in Mr. Berny's testimony (Docket No. 33309, page 13, lines 14 to 23 and Docket No. 33310, page 13, lines 16 to 25). Also, please provide the number of MW and MWh used by each customer class.
16. Mr. Berny's testimony at page 20-21 provides hypothetical information about the inspection of energy efficiency projects. Please provide data for the test year on inspections conducted in the Residential and Hard-to-Reach standard offer programs. Please provide the total number of households participating, the number of problems cited in the inspections, the top ten problems cited, and the top ten serious problems where there substantial repair costs to correct the problem.
17. Mr. Berny's testimony (Docket No. 33309, page 21, lines 21 to 22 and Docket No. 33310, page 22, lines 1 to 2) implies that a contractor whose work is in question is not placed on any probationary status but is allowed to continue working. Is this an accurate interpretation of his testimony? Please explain.
18. What recourse does a residential consumer have if a contractor fails to meet the customer's expectations or the expectations of the program?
19. Please provide TCC's and TNC's annual energy efficiency goal for the calendar years 2001 through 2006, the amount of demand and energy saved, and the percent of the goal achieved in each calendar year. (Estimated data may be provided for 2006.)
20. Mr. Berny's testimony (Docket No. 33309, page 23, line 22 and page 24, lines 1 through 6, and Docket No. 33310, page 24, lines 2 through 8) describes the factors considered in allocating program resources to various customer classes. Please list all of the factors

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considered in TCC's and TNC's allocation process and the values assigned to each of the factors.

21. In regards to the Hard to Reach Standard Offer Program (HTR SOP) referenced on page 28, lines 18 through 26 (Docket No. 33309) and page 27, lines 26 through 31 (Docket No. 33310) please provide a copy of the standard offer agreement for 2005 and a copy of the agreement for 2006.
22. Please provide the total number of contactors participating in the HTR SOP during the test year and a description of the number of customers that received services at no cost and the number of customers that were required to pay program costs for the HTR SOP.
23. Please provide the total number of households that received benefits under the HTR SOP during the test year and provide the number or percent of these customers that received energy efficiency benefits living in single family homes and the numbers living in apartments.
24. On page 35, lines 20 through 22 and page 36, lines 1 through 7 (Docket No. 33310) Mr. Berny compares the energy efficiency expenditures of TNC with two other utilities in Texas. Has Mr. Berny compared TNC's accomplishments with the accomplishments of utilities in other states? If so please describe the findings of the comparisons.
25. Are solar water heating systems installed under TCC's or TNC's energy efficiency programs? If yes, please identify the program and the amount of incentive that would be received by the contractor for installing the system. Please provide the number of systems installed under the program to date.
26. Are photovoltaic systems installed under TCC's or TNC's energy efficiency programs? If yes, please identify the program and the amount of incentive that would be received by the contractor for installing the system, Please provide the number of systems installed under the program to date.
27. What measures are most commonly installed under the residential and HTR SOP?
28. Please provide copies of all comments provided in the Energy Efficiency Implementation project on the public school facilities program mentioned at page 37, line 18 of Mr. Berny's testimony (Docket No. 33310).
29. How will energy savings be calculated for the public school facilities program under the PUC's energy efficiency rules?
30. What types of activities will qualify for incentive payments and how and when will energy savings be realized?

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31. Please provide copies of all comments provided in the Energy Efficiency Implementation Project on the municipal and local government facilities pilot project referenced at page 39, line 10 of Mr. Berny's testimony (Docket No. 33310).
32. How will energy savings be calculated for the municipal and local government facilities pilot project?
33. What types of activities will qualify for incentive payments and how and when will energy savings be realized under the municipal and local government facilities pilot project?
34. Please provide copies of all energy efficiency potential studies conducted by TNC or relied upon by TNC in its determination that public schools and municipal and local government facilities were the best targets for utility energy efficiency.
35. Exhibit BGB-4 (Docket No. 33310) asks that TNC be granted a waiver of the competitive solicitation requirement for its pilot market transformation program. Please provide additional information as to why this waiver is necessary and desirable.
36. Exhibit BGB-10, page 6 (Docket No. 33309) and BGB-8, page 6 (Docket No. 33310) lists the benefits of energy efficiency. Please provide all available data on how TCC's and TNC's energy efficiency programs have lowered customers' energy bills, provided greater customer control and greater customer satisfaction.
37. Exhibit BGB-10, page 6 (Docket No. 33309) and BGB-8, page 6 (Docket No. 33310) lists the benefits of energy efficiency. Please provide all available data on how TCC's and TNC's energy efficiency programs have a lower cost than the cost of supplying new generation only from new power plants.
38. Exhibit BGB-10, page 6 (Docket No. 33309) and BGB-8, page 6 (Docket No. 33310) lists the benefits of energy efficiency. Please provide all available data on how TCC's and TNC's energy efficiency programs are modular and quick to deploy.
39. Exhibit BGB-10, page 6 (Docket No. 33309) and BGB-8, page 6 (Docket No. 33310) lists the benefits of energy efficiency. Please provide all available data on how TCC's and TNC's energy efficiency programs provide significant energy savings.
40. Exhibit BGB-10, page 6 (Docket No. 33309) and BGB-8, page 6 (Docket No. 33310) lists the benefits of energy efficiency. Please provide all available data on how TCC's and TNC's energy efficiency programs provide environmental benefits.
41. Exhibit BGB-10, page 6 (Docket No. 33309) and BGB-8, page 6 (Docket No. 33310) lists the benefits of energy efficiency. Please provide all available data on how TCC's and TNC's energy efficiency programs support economic development.

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42. Exhibit BGB-10, page 6 (Docket No. 33309) and BGB-8, page 6 (Docket No. 33310) lists the benefits of energy efficiency. Please provide all available data on how TCC's and TNC's energy efficiency programs provide greater energy security.
43. Please provide the number of residential customers served by TCC and TNC by county.
44. Please provide poverty rates for all of the counties served by TCC and TNC.
45. What programs are currently available to low-income consumers in the TCC and TNC service areas?