



Control Number: 33309



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DOCKET NO. 33309

**APPLICATION OF AEP TEXAS § PUBLIC UTILITY COMMISSION
CENTRAL COMPANY FOR §
AUTHORITY TO CHANGE RATES. § OF TEXAS**

DOCKET NO. 33310

**APPLICATION OF AEP TEXAS § PUBLIC UTILITY COMMISSION
NORTH COMPANY FOR §
AUTHORITY TO CHANGE RATES. § OF TEXAS**

**OFFICE OF PUBLIC UTILITY COUNSEL'S FIRST REQUEST FOR
INFORMATION TO AEP TEXAS CENTRAL COMPANY AND AEP TEXAS
NORTH COMPANY**

COMES NOW, the Office of Public Utility Counsel ("OPUC"), and files this, its First Request for Information to AEP Texas Central Company ("TCC") and AEP Texas North Company ("TNC") in the captioned proceeding.

Under Commission Procedural Rules 22.141-.145, 16 Tex. Admin. Code Ch. 22, OPC requests that TCC and TNC, as defined herein, provide the following information and answer the following question under oath. Please answer the questions and sub-questions in the order in which they are listed and in sufficient detail to provide a complete and accurate answer to the question.

Definitions

As used in this introduction and in these questions,

- (1) "AEP TCC", "TCC", the "Company", and "Applicant" refer to the AEP Texas Central Company and its affiliates;
- (2) "AEP TNC", "TNC", the "Company", and "Applicant" refer to the AEP Texas Central Company and its affiliates;

- (3) "Applicants" refer to TCC and TNC as defined above;
- (4) "You", "yours" and "your" refer to TCC and TNC (as defined above), including its directors, officers, employees, consultants, agents, and attorneys.
- (5) "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 or any other media, including, but not limited to, electronic mail (e-mail), 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.

Instructions

In answering these questions, furnish all information that is available to you, including information in the possession of your agents, 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.

If you have possession, custody, or control (as defined by Tex. R. Civ. P. 192.7(b)) of the originals of these documents requested, please produce the originals or a complete copy of the originals and all copies that are different in any way from the original, whether by interlineation, receipt stamp, or notation.

If you do not have possession, custody, or control of the originals of the documents requested, please produce copies of the documents, however made, in your possession, custody, or control. 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.

Claim of Privilege

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.

Questions

The Definitions, Instructions, and Claim of Privilege set out in this Request for Information apply to these questions.

If any question appears confusing, please request clarification from the undersigned counsel.

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.

As part of the response to each question, 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 question 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 question and who can vouch for the truth of the answer. If the question has sub-parts, please identify the witness or witnesses by sub-part.

Rather than waiting to provide all of the responses at the same time, please provide individual responses as each becomes available.

These questions are continuing in nature. If there is a change in circumstances or facts or if you receive or generate additional information that changes your answer between the time of your original response and the time of the hearings, then you should submit, under oath, a supplemental response to your earlier answer.

If you consider any question 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 you object to any of the questions on the grounds that the question seeks confidential information, or on any other grounds, please call the undersigned counsel as soon as possible.

If the response to any question is voluminous, please provide separately an index to the materials contained in the response.

If the information requested is included in previously furnished exhibits, workpapers, responses to other discovery inquiries or otherwise, in hard copy or electronic format, please furnish specific references thereto, including Bates Stamp page citations and detailed cross-references.

To the extent that a question asks for the production of copyrighted material, it is sufficient to provide a listing of such material, indicating the title, publisher, author, edition, and page references relied on or otherwise relevant to the question.

OPUC's First Request For Information To TCC and TNC
PUC Docket Nos. 33309 & 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 replies.

- 1-1** Please provide the original worksheets in working electronic format for all schedules, workpapers and supporting documents that were prepared using Excel. Please be sure that all files are completely functional.
- 1-2** Please provide each return filed and work paper prepared since 1990 necessary to give a complete picture of the utilization of tax losses in a different year than the year the loss was generated. For the returns, forms, or work papers that have been previously provided in response to an RFI in this case, if any, please provide specific references to the RFI numbers and specific page numbers for each tax year.
- 1-3** Please provide a summary of all Texas rate cases since 1990 in which the PUC included a consolidated tax savings adjustment in the determination of rates. Include the docket number for each case.

The following question is directed to AEP TCC only.

- 1-4** Please provide the following schedules from each of the federal income tax returns in which AEP TCC was included for the years 1991-2005:
 - a.) Form 1120 (4 pages)
 - b.) The detail schedule that presents the income and expenses for each entity included in the consolidated return.

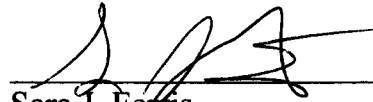
The following question is directed to AEP TNC only.

- 1-5** Please provide the following schedules from each of the federal income tax returns in which AEP TCC was included for the years 1991-2005:
 - a.) Form 1120 (4 pages)
 - b.) The detail schedule that presents the income and expenses for each entity included in the consolidated return.

Dated: November 21, 2006

Respectfully submitted,

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ATTORNEYS FOR THE
OFFICE OF PUBLIC UTILITY COUNSEL

CERTIFICATE OF SERVICE
PUC DOCKET NOS. 33309 & 33310

I hereby certify that today, November 21, 2006, I served a true copy of the Office of Public Utility Counsel's 1st RFI to AEP TCC and AEP TNC on all parties of record via hand delivery, facsimile, or United States First-Class Mail.



Sara J. Ferris