



Control Number: 33309



Item Number: 257

Addendum StartPage: 0

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

<b>APPLICATION OF AEP TEXASCENTRAL COMPANY FOR AUTHORITY TO CHANGE RATES</b>	<b>§ § § § §</b>	<b>BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS</b>
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**SOAH DOCKET NO. 473-07-0851**  
**DOCKET NO. 33310**

<b>APPLICATION OF AEP TEXAS NORTH COMPANY FOR AUTHORITY TO CHANGE RATES</b>	<b>§ § § § §</b>	<b>BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS</b>
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**COMMISSION STAFF'S SEVENTEENTH REQUEST FOR  
INFORMATION TO AEP TEXAS CENTRAL AND AEP TEXAS  
NORTH COMPANIES  
QUESTION NOS. BA17-1 THROUGH BA17-10**

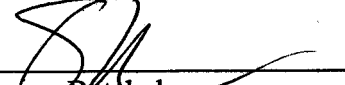
The Commission Staff of the Public Utility Commission of Texas (Staff) requests that AEP Texas Central (TCC) and AEP Texas North (TNC) Companies provide the following information and answer the following question(s) under oath. The question(s) shall be answered in sufficient detail to fully present all of the relevant facts, within the time limit provided by the Presiding Officer or within 20 days, if the Presiding Officer has not provided a time limit. Please copy the question immediately above the answer to each question. These question(s) are continuing in nature, and if there is a relevant change in circumstances, submit an amended answer, under oath, as a supplement to your original answer. State the name of the witness in this cause who will sponsor the answer to the question and can vouch for the truth of the answer.

Provide an original and ten copies of your answers to the questions to the Filing Clerk, Public Utility Commission of Texas, 1701 N. Congress Avenue, P.O. Box 13326, Austin, Texas 78711-3326.

Respectfully Submitted,

Thomas S. Hunter  
Division Director  
Legal Division

Keith Rogas  
Deputy Division Director  
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Attorney-Legal Division  
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(512) 936-7293  
(512) 936-7268 (facsimile)  
Public Utility Commission of Texas  
1701 N. Congress Avenue  
P.O. Box 13326  
Austin, Texas 78711-3326

**SOAH DOCKET NOS. 473-07-0833 & 473-07-0851  
DOCKET NOS. 33309 & 33310**

**CERTIFICATE OF SERVICE**

I certify that a copy of this document will be served on all parties of record on this the 9th day of February 2007 in accordance with P.U.C. PROC. R. 22.74.

  
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Sonya Batchelor

**SOAH DOCKET NOS. 473-07-0833 & 473-07-0851  
DOCKET NOS. 33309 & 33310**

**INSTRUCTIONS**

**DEFINITION OF THE WORD "DOCUMENT"**

"Document" includes any written, recorded or graphic matter, however produced or reproduced, including but not limited to correspondence, telegrams, contracts, agreements, notes in any form, memoranda, diaries, voice recording tapes, microfilms, pictures, computer media, work papers, calendars, minutes of meetings or other writings or graphic matter, including copies containing marginal notes or variations of any of the foregoing, now or previously in your possession.

In the event any documents requested by this Request for Information have been transferred beyond the Company's control, describe the circumstances under which the document was destroyed or transferred and provide an exact citation to the subject document.

In the event that documents containing the exact information do not exist, but documents do exist which contain portions of the required information or which contain substantially similar information, then the definition of "documents" shall include the documents which do exist and these documents will be provided.

**SOAH DOCKET NOS. 473-07-0833 & 473-07-0851**  
**DOCKET NOS. 33309 & 33310**

The following questions refer to Mr. Pasternack's testimony in Dockets 33309 and 33310 and the responses to RFI in the two dockets.

BA17-1 Please refer to page 27. Mr. Pasternack states three reasons why TCC uses contractor services to supplement TCC's own workforce.

1. respond to changes in workload related to construction activities
2. service restoration
3. provide some of TCC's ongoing 24X7 support staff.

Please explain how the ongoing vegetation management addresses any of the above reasons.

BA17-2 Please refer to page 27. Please explain how the contractors are evaluated annually for safety qualification and productivity compliance.

BA17-3 Please provide the total number of man-hours worked for the Transmission Services Corpus Christi organization for calendar years 2004, 2005, and 2006. Also provide the organization's total lost time due to accidents for each year.

BA17-4 Please provide the total number of man-hours worked for the contractor services for transmission maintenance for calendar years 2004, 2005, and 2006. Also provide the contractors' total lost time due to accidents for each year.

BA17-5 Please refer to the response to Staff's 1<sup>st</sup> RFI, question BA1-14. Are all the areas identified by the annual aerial patrol that may need attention addressed within a specific period of time after identification? If not, how are these areas addressed?

BA17-6 Please refer to page 17 of the TCC and page 16 of the TNC testimony. Paragraph 2 states that TCC employees work primarily on TCC projects and assets. Please explain the secondary work that these employees perform on non-TCC work and how their time is allocated to the non-TCC projects.

BA17-7 Please refer to page 22 of the TCC and TNC testimonies. Please provide a breakdown of the O&M costs for 2003, 2004, 2005 and test year using the FERC accounts on Table 1 in the testimonies.

BA17-8 What are the normal cost escalators that Mr. Pasternack uses in developing the test year O&M costs?

**BA17-9** What portion of the test year O&M costs are related directly to the requirements of the Energy Policy Act of 2005 for the mandatory reliability standards?

**BA17-10** Please explain why LCRA TSC was not included in the benchmarking studies.