



Control Number: 33310



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

APPLICATION OF AEP TEXAS	§	BEFORE THE PUBLIC UTILITY
NORTH COMPANY FOR	§	COMMISSION OF TEXAS
AUTHORITY TO CHANGE RATES	§	

**AEP TEXAS NORTH COMPANY'S FIRST SET OF
REQUESTS FOR INFORMATION TO THE
TEXAS INDUSTRIAL ENERGY CONSUMERS**

Pursuant to Commission Procedural Rules 22.141 - .145, AEP Texas North Company ("TNC") requests that the requests that the Texas Industrial Energy Consumers ("TIEC") answer under oath this First Set of Requests for Information. The answers should be provided in sufficient detail to present all relevant facts. These requests are deemed to be continuing and require further and supplemental responses from a party if it receives or generates additional information within the scope of these data requests between the time of the original responses and the time of the hearing in this proceeding.

DEFINITIONS AND INSTRUCTIONS

1. Reference to "you" or "your" means all members, divisions, departments, bureaus, agencies of the party served, and all witnesses whose testimony the respective party intends to present to the Public Utility Commission of Texas, and all persons acting or purporting to act for or on behalf of the respective party, including all staff, employees, agents, representatives, attorneys, consultants, economists, engineers, and accountants.

2. The terms "document" and "documents" are used in their broadest sense and shall mean and include all written, printed, typed, recorded, or graphic matter of every kind and description and all attachments and appendices thereto. Without limiting the foregoing, the terms "document" and "documents" shall include all agreements, contracts, communications,

correspondence, letters, telegrams, telexes, messages, memoranda, records, reports, books, summaries, records of personal conversations, minutes or summaries or other records of meetings and conferences, other summaries, diaries, diary entries, calendars, appointment books, time records, instructions, work assignments, financial statements, work sheets, workpapers, drafts, graphs, maps, charts, tables, accounts, analytical records, consultants' reports, appraisals, bulletins, brochures, pamphlets, circulars, trade letters, press releases, notes, notices, marginal notations, notebooks, telephone records, bills, statements, records of obligation and expenditure, invoices, lists, journals, advertising, recommendations, printouts, compilations, tabulations, analyses, studies, surveys, transcripts of hearings, transcripts of testimony, affidavits, expense reports, microfilm, microfiches, articles, speeches, tape or disk recordings, punch cards, programs, data compilation from which information can be obtained (including matter used in data processing) and other printed, written, handwritten, typewritten, recorded, stenographic, computer-generated, computer-stored, electronically-stored matter, however and by whomever produced, prepared, reproduced, disseminated, or made.

3. "Person" means any natural person, firm, association, partnership, joint venture, corporation, estate, trust, receiver, syndicate, municipal corporation, government agency, any other form of legal entity, and other group or combination acting as a unit.

4. "Identify" means:

- a. as to a "person," stating his, her or its:
 - (i) legal, full and customarily used names;
 - (ii) present residential or business address;
 - (iii) job title; and
 - (iv) name of employer.

- b. as to a document, act, event, transaction or occurrence, stating:
 - (i) its date, authors or participants;
 - (ii) the place where it took place, was created or occurred;
 - (iii) its purpose and subject matter; and
 - (iv) a concise description of what transpired.

5. Prior to each individual response, please restate the Request for Information and following each individual response, identify the individual(s) responsible for preparing and sponsoring the response by name and title.

- 6. For each document produced that is generated by computer, please:
 - a. identify the nature and source of the data constituting the input;
 - b. identify the form of the input (*e.g.*, tapes, punch cards);
 - c. identify the recording system employed (*e.g.*, program, flow charts); and
 - d. provide an electronically manipulable version on disc (*i.e.*, CD or DVD), diskette, or other generally utilized electronic or magnetic medium.

Respectfully submitted,

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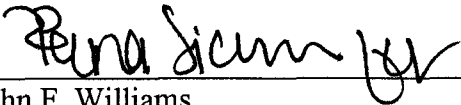
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ATTORNEYS FOR
AEP TEXAS NORTH COMPANY

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was served on all parties of record via U.S. first-class mail, hand delivery, overnight delivery, or facsimile transmission on the 14th day of March, 2007.



John F. Williams

REQUESTS FOR INFORMATION

- TNC 1-1. For each witness presenting testimony on behalf of TIEC in this proceeding, please provide:
- a. to the extent not provided with the witness's testimony, a complete copy of the workpapers, including copies of all models, spreadsheets, calculations, and other documents, supporting the witness's testimony;
 - b. each witness's resume and/or curriculum vitae and bibliography;
 - c. any testimony or written statement where the witness took a position inconsistent with his or her position in this proceeding;
 - d. all documents relied on by each testifying witness in the preparation of his or her testimony;
 - e. a copy of the pertinent portions of all publications and authoritative treatises cited or specifically relied on by the witness in the preparation of his or her testimony;
 - f. all documents, reports, models, data, and publications provided to the witness by any non-testifying or consulting witness in preparation for his or her testimony;
 - g. copies of all articles, commentaries, editorials, authoritative treatises or other written work that each testifying witness has had published in any journal, newspaper, magazine, or other publication since January 1, 2002; and
 - h. a list of all cases in which each witness has filed testimony or been cross-examined, including the jurisdiction, the subject matter of the testimony, docket number, and the date the testimony was filed.
 - i. a copy of the last 5 pieces of testimony filed by the witness in any gas or electric utility regulatory proceeding.
- TNC 1-2. For any non-testifying or consulting expert whose mental impressions or opinions have been reviewed by an expert testifying for TIEC, please provide:
- a. the non-testifying or consulting expert's name, address, and telephone number;
 - b. the general substance of the non-testifying or consulting expert's mental impressions and opinions and a brief summary of the basis for those opinions;

- c. the non-testifying or consulting expert's resume and/or curriculum vitae and bibliography;
- d. copies of all articles, commentaries, editorials, or other written work that each testifying witness has had published in any journal, newspaper, magazine, or other publication since January 1, 2002; and
- e. a copy of the last 5 pieces of testimony filed by the non-testifying or consulting expert in any gas or electric utility regulatory proceeding.