

Control Number: 33310



Item Number: 381

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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 SECOND SET OF
REQUESTS FOR INFORMATION TO CITIES**

APPROVED
2017/10/16 PM 2:30
[Signature]

Pursuant to Commission Procedural Rules 22.141 - .145, AEP Texas North Company (“TNC”) requests that the Cities of Corpus Christi, et al. (“Cities”) answer under oath this Second 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.

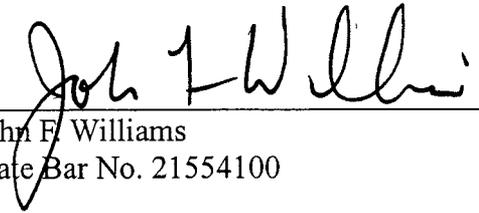
Respectfully submitted,

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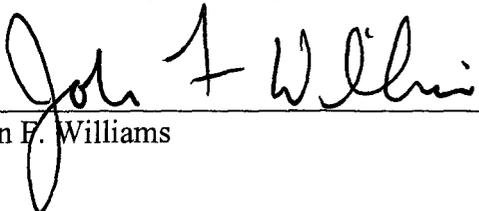


John F. Williams
State Bar No. 21554100

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 16th day of March, 2007.



John F. Williams

REQUESTS FOR INFORMATION

- TNC 2-1. Referencing the testimony of Nancy Heller Hughes, please identify each instance in which the witness identified a survivor curve with a better statistical fit than the curve chosen by the Company, but she nonetheless did not recommend adoption of such curve. In each instance, provide the following:
- a) identify the curve that had the better statistical fit;
 - b) provide the comparison of the “sum of squared deviations” that demonstrates that the identified survivor curve had a better statistical fit;
 - c) explain why the survivor curve with the better statistical fit was not included in the witness’ recommended adjustments to the Company’s depreciation rate proposal.
- TNC 2-2. Referencing the testimony of Nancy Heller Hughes, please identify each instance in which the witness identified a survivor curve that in her opinion had a better visual fit than the curve chosen by the Company, but she nonetheless did not recommend adoption of such curve. In each instance, provide the following:
- a) identify the curve that in the witness’ opinion had a better visual fit;
 - b) explain why the survivor curve that the witness believed had a better visual fit was not included in the witness’ recommended adjustments to the Company’s depreciation rate proposal.
- TNC 2-3. Referencing page 20, lines 7-13 of the testimony of Nancy Heller Hughes in Docket No. 33310, please explain the factual basis for the witness’ opinion that transmission station and distribution station equipment should be treated as equivalent for purposes of the development of depreciation rates.