



Control Number: 33310



Item Number: 432

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

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

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PUBLIC UTILITY COMMISSION
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**OBJECTIONS OF STAFF TO THE FEDERAL EXECUTIVE
AGENCIES FIRST REQUEST FOR INFORMATION TO THE
PUBLIC UTILITY COMMISSION OF TEXAS STAFF**

COMES NOW the Staff of the Public Utility Commission of Texas (Staff), representing the public interest and files these Objections of Staff to the Federal Executive Agencies (FEA) First Request for Information (RFI) and would show the following:

STAFF'S OBJECTIONS ARE TIMELY

Although Order No. 6 does not specifically address a deadline for Staff to file objections to RFIs related to Staff's direct case, it does require Staff to respond to RFIs within five days of receipt. In that respect, the deadline for responding to FEA's RFI is April 2, 2007. Staff has filed these objections within two days of receipt.

FEA'S REQUESTS FOR INFORMATION ARE NOT TIMELY

Order No. 6 requires parties to file RFIs related to Staff's direct case by March 27, 2007. FEA filed its RFI related to Staff's direct case on March 28, 2007 (See Attachment 1). As such, FEA failed to meet the deadline set forth in Order No. 6 and is not timely.

FEA'S REQUESTS FOR INFORMATION

FEA's RFI are set forth below:

FEA 1-1 : Referring to the direct testimony of Erin K. Wasik-Gutierrez:

- a. Please provide a complete copy of the Staffs proposed functional and class

cost of service models and rate design schedules, along with all supporting workpapers, in Microsoft Excel format with all formulas intact. Please include annotations in the spreadsheets to explain each and every change that the Staff made to the functional and class cost of service models and rate design schedules proposed by the Company in this case.

b. Please provide a complete and detailed explanation of the nature and cost impacts of the "error in the flow of work" in the Company's cost of service models identified by Ms. Wasik-Gutierrez on page 12, lines 4-10, of her direct testimony.

c. Please explain in detail why the Staffs proposed cost of service model results in an increase in the allocated distribution function costs to the Primary and Transmission classes relative to the Company's request, despite the fact that the Staff is proposing a reduction to the Company's requested total revenue requirement.

d. Please explain in detail the reasons for the significant discrepancy between the Transmission Service Charges proposed in Exhibit EKWG-3 and the Transmission Service Charges proposed by the Company.


CONCLUSION

FEA's RFI requests were not timely filed. Staff requests the ALJ to sustain Staff's objections to Erin K. Wasik-Gutierrez FEA 1-1a, 1-1b, 1-1c and 1-1d.

Respectfully Submitted,

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Division Director
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CERTIFICATE OF SERVICE

I certify that a copy of this document will be served on all parties of record on this the 30th day of March 2007 in accordance with P.U.C. PROC. R. 22.74.



Sonya Batchelor

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PUC DOCKET NO. 33310

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BEFORE THE STATE OFFICE
OF
ADMINISTRATIVE HEARINGS

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2007 MAR 28 AM 9:40
PUBLIC UTILITY COMMISSION
FILING CLERK

**Federal Executive Agencies First Request for
Information to the Public Utility Commission of Texas Staff**

FEA 1-1: Referring to the direct testimony of Erin K. Wasik-Gutierrez:

- a. Please provide a complete copy of the Staff's proposed functional and class cost of service models and rate design schedules, along with all supporting workpapers, in Microsoft Excel format with all formulas intact. Please include annotations in the spreadsheets to explain each and every change that the Staff made to the functional and class cost of service models and rate design schedules proposed by the Company in this case.
- b. Please provide a complete and detailed explanation of the nature and cost impacts of the "error in the flow of work" in the Company's cost of service models identified by Ms. Wasik-Gutierrez on page 12, lines 4-10, of her direct testimony.
- c. Please explain in detail why the Staff's proposed cost of service model results in an increase in the allocated distribution function costs to the Primary and Transmission classes relative to the Company's request, despite the fact that the Staff is proposing a reduction to the Company's requested total revenue requirement.
- d. Please explain in detail the reasons for the significant discrepancy between the Transmission Service Charges proposed in Exhibit EKWG-3 and the Transmission Service Charges proposed by the Company.

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ATTACHMENT 1