



Control Number: 40358



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**SOAH DOCKET NO. 473-12-6079
PUC DOCKET NO. 40358**

APPLICATION OF AEP TEXAS NORTH COMPANY TO ADJUST ENERGY EFFICIENCY COST RECOVERY FACTOR AND RELATED RELIEF	§ § § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
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**COMMISSION STAFF'S THIRD REQUEST FOR INFORMATION
TO AEP TEXAS NORTH COMPANY
QUESTION NOS. STAFF 3-1 THROUGH STAFF 3-8**

Pursuant to § 22.144 of the Commission's Procedural Rules, the Staff of the Public Utility Commission of Texas (Staff) requests that AEP Texas North Company (TNC or the "Company") by and through its attorneys of record, provide responses to Staff's Third Request for Information (RFI).

Pursuant to P.U.C. PROC. R. 22.144(c)(2), Staff requests that answers to the requests for information be made under oath. Each answer should identify the person responsible for preparing the answer (other than the purely clerical aspects of its preparation), and the name of the witness in this proceeding who will sponsor the answer and guarantee its accuracy. In producing documents pursuant to this request for information, please indicate the specific request(s) to which the document is being produced.

Pursuant to P.U.C. PROC. R. 22.144(i), the respondent to these requests is under a duty to supplement any response that in light of newly discovered information modifies or makes incomplete an answer already supplied, within five days of the discovery of the new information.

Please answer each request and sub-request in the order in which they are listed and in sufficient detail to provide a complete and accurate answer to the request.

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

DATE: May 15, 2012

Respectfully Submitted,

Margaret Uhlig Pemberton
Division Director-Legal Division

Keith Rogas
Deputy Division Director-Legal Division



Brennan J. Foley
Attorney – Legal Division
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Public Utility Commission of Texas
1701 N. Congress Avenue
P.O. Box 13326
Austin, Texas 78711-3326

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CERTIFICATE OF SERVICE

I certify that a copy of this document will be served on all parties of record on May 15, 2012 in accordance with Public Utility Commission of Texas Procedural Rule 22.74.



Brennan J. Foley

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DEFINITIONS AND INSTRUCTIONS

“**Applicant**,” “**you**,” or “**TNC**” refers to AEP Texas North Company, its affiliates and any person acting or purporting to act on its behalf including without limitation: subsidiaries, attorneys, agents, advisors, investigators, representatives, employees or other persons.

The terms “**document**” or “**documents**” are used in their broadest sense to include, by way of illustration and not limitation, all written or graphic matter of every kind and description whether printed, produced or reproduced by any process whether visually, magnetically, mechanically, electronically or by hand, whether final or draft, original or reproduction, whether or not claimed to be privileged or otherwise excludable from discovery, and whether or not in your actual or constructive possession, custody, or control. The terms including writings, correspondence, telegrams, memoranda, studies, reports, surveys, statistical compilations, notes, calendars, tapes, computer disks, electronic storage of any type, data on computer drives, e-mails, cards, recordings, contracts, agreements, invoices, licenses, diaries, journals, accounts, pamphlets, books, ledgers, publications, microfilm, microfiche and any other data compilations from which information can be obtained and translated, by you if necessary, into reasonably usable form. “Document” or “documents” shall also include every copy of a document where the copy contains any commentary or notation of any kind that does not appear on the original or any other copy.

Pursuant to Rule 196.4 of the Texas Rules of Civil Procedure, Staff specifically requests that any electronic or magnetic data (which is included in the definition of “document”) that is responsive to a request herein be produced on CD-ROM in a format that is compatible with Microsoft Office software and be produced with your response to these requests.

The terms “**and**” and “**or**” shall be construed as either disjunctive or conjunctive as necessary to make the request inclusive rather than exclusive.

“**Each**” shall be construed to include the word “**every**” and “**every**” shall be construed to include the word “**each**.”

“**Any**” shall be construed to include “**all**” and “**all**” shall be construed to include “**any**.”

The term “**concerning**” includes the following meanings: relating to; pertaining to; regarding; discussing; mentioning; containing; reflecting; evidencing; describing; showing;

identifying; providing; disproving; consisting of; supporting; contradicting; in any way legally, logically, or factually connected with the matter to which the term refers; or having a tendency to prove or disprove the matter to which the term refers.

The term “**including**” means and refers to “including but not limited to.”

Words used in the plural shall also be taken to mean and include the singular. Words used in the singular shall also be taken to mean and include the plural.

The present tense shall be construed to include the past tense, and the past tense shall be construed to include the present tense.

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 of copies, subject matter of the document, and the basis upon which such privilege is claimed.

Pursuant to P.U.C. Proc. R. 22.144(h)(4), if the response to any request is voluminous, please provide a detailed index of the voluminous material.

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.

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**COMMISSION STAFF'S THIRD REQUEST FOR INFORMATION
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QUESTION NOS. STAFF 3-1 THROUGH STAFF 3-8**

- STAFF-3-1** What is the highest amount spent on any customer, and has TNC quantified the savings for whom they've spent the highest program costs?
- STAFF-3-2** Are there any low income programs, and if so, what is the total amount spent? How has TNC determined the cost-effectiveness of these programs?
- STAFF-3-3** What discount rate did TNC use in calculating the net present value of the savings or costs? Did TNC include line loss factor in its net savings calculation? If so, please provide details.
- STAFF-3-4** What are the total administrative costs, overhead costs, and what percentage of total costs associated with the energy efficiency programs does that represent?
- STAFF-3-5** For the cost-benefit analysis for each of the programs, what is the net cost to benefit ratio?
- STAFF-3-6** Please show how TNC's energy savings goal was calculated.
- STAFF-3-7** Please list the measure offered by program, along with the incentive payment offered for each individual measure, for the Commercial and Industrial SOP, the Small Commercial SOP, the Retro-Commissioning MTP, the Residential SOP and the Hard to Reach Program
- STAFF-3-8** Please list all planned Research and Development expenditures for 2013.