



Control Number: 40358



Item Number: 6

Addendum StartPage: 0

SOAH DOCKET NO. 473-12-6079  
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APPLICATION OF AEP TEXAS NORTH § BEFORE THE STATE OFFICE  
COMPANY TO ADJUST ENERGY §  
EFFICIENCY COST RECOVERY § OF  
FACTOR AND RELATED RELIEF § ADMINISTRATIVE HEARINGS

**COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION  
TO AEP TEXAS NORTH COMPANY  
QUESTION NOS. STAFF 1-1 THROUGH STAFF 1-4**

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 First 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.

6

**DATE: May 8, 2012**

Respectfully Submitted,

Margaret Uhlig Pemberton  
Division Director-Legal Division

Keith Rogas  
Deputy Division Director-Legal Division



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Brennan J. Foley  
Attorney – Legal Division  
State Bar No. 24055490  
(512) 936-7256  
(512) 936-7268 (facsimile)  
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 8, 2012 in accordance with Public Utility Commission of Texas Procedural Rule 22.74.



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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 FIRST REQUEST FOR INFORMATION**  
**TO AEP TEXAS NORTH COMPANY**  
**QUESTION NOS. STAFF 1-1 THROUGH STAFF 1-4**

- STAFF-1-1** With regard to the 2011 program year, has TNC provided any energy efficiency measures to a customer wherein the Company's expenditures for that customer exceeded \$250,000 of total incentive expenditures for the year?
- STAFF-1-2** Please provide a current copy of the organizational chart listing each of TNC's full time equivalent employees (FTEs) whose positions and/or job responsibilities entail work related to the Company's energy efficiency program. This chart should clearly state the job title for each position.
- (a) For each FTE, please indicate if there is a variable component to total compensation.
  - (b) For each FTE with one or more variable component(s) to their compensation, please explain how each variable component is calculated. Please provide a copy of any official contract terms, internal compensation planning documents or policy manuals describing the variable compensation plan.
- STAFF-1-3** Please provide a current list for each of the program years 2011 and 2013 of any and all contractors, subcontractors, consultants or other outside service companies (collectively, "providers") which TNC has engaged in providing services related to the Company's energy efficiency program.
- (a) For each engagement with a provider in program years 2011 and 2013, please indicate if there is a variable component to the total compensation paid or to be paid for that engagement with the provider.
  - (b) For each engagement with a provider identified in a) above, please explain how each variable component is calculated, and provide a copy of any official contract terms or policy manuals describing the variable compensation plan.
- STAFF-1-4** Please provide the information below for each of the following customer classes: Residential, Secondary Less than or Equal to 10kw, Secondary Greater than 10kw, Primary, Transmission, and Lighting.

- (a) Actual program year 2011 incentive expenditures on each energy efficiency program offered by the Company for each of the above-listed customer classes.
- (b) The amount of program year 2011 Administrative expenditures directly assigned to each of the above-listed customer classes, and a justification for such direct assignment.
- (c) Any amounts of program year 2011 Administrative expenditures allocated among the above-listed customer classes, a justification for allocating instead of directly assigning those costs to each of the above-listed customer classes, and a complete explanation of the allocation methodology, including the derivation of any allocation factors utilized, and the resulting amounts allocated to each customer class.
- (d) The amount of program year 2011 Research & Development expenditures directly assigned to each of the above-listed customer classes, and a justification for such direct assignment to each of the above-listed customer classes.
- (e) Any amounts of program year 2011 Research & Development expenditures allocated among the above listed customer classes, a justification for allocating instead of directly assigning those costs to each of the above-listed customer classes, and a complete explanation of the allocation methodology, including the derivation of any allocation factors utilized, and the resulting amounts allocated to each customer class.
- (f) The assignment or allocation of any requested projected 2013 evaluation, measurement, and verification ("EM&V") costs to each of the above-listed customer classes, and a complete explanation and justification for any assignments or allocations among the above-listed customer classes.
- (g) Projected program year 2013 and actual program year 2011 monthly bill billing determinants for each of the above-listed customer classes, excluding ineligible customers. If projections for program year 2013 are unavailable for any class, please provide historical total annual monthly bill billing determinants for that class for each of the past twenty years.
- (h) Projected program year 2013 and actual program year 2011 kWh billing determinants for each of the above-listed customer classes, excluding ineligible customers. If projections for program year 2013 are unavailable for any class, please provide historical annual kWh billing determinants for each of the past twenty years, both with and also without weather-adjustments.
- (i) Actual 2011 EECRF revenues collected for each of the above-listed customer classes.

- (j) A complete explanation and justification of the proposed allocation methodology of the requested performance bonus to each of the above-listed customer classes.