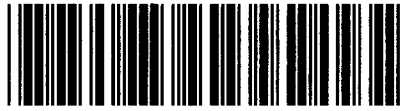




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Addendum StartPage: 0

SOAH DOCKET NO. 473-12-7519
PUC DOCKET NO. 40443

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APPLICATION OF SOUTHWESTERN
ELECTRIC POWER COMPANY FOR
AUTHORITY TO CHANGE RATES AND
RECONCILE FUEL COSTS §
§
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§

PUBLIC UTILITY COMMISSION
OF TEXAS

**COMMISSION STAFF'S SEVENTH REQUEST FOR INFORMATION
TO SOUTHWESTERN ELECTRIC POWER COMPANY (SWEPCO)
QUESTION NOS. STAFF 7-1 THROUGH STAFF 7-13**

Pursuant to § 22.144 of the Commission's Procedural Rules, the Staff of the Public Utility Commission of Texas (Staff) requests that Southwestern Electric Power Company (SWEPCO) by and through its attorney of record, provide responses to Staff's Seventh 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 requests(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.

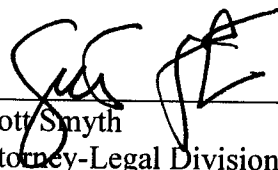
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DATE: August 30, 2012

Respectfully Submitted,

Margaret Uhlig Pemberton
Division Director-Legal Division

Keith Rogas
Deputy Division Director-Legal Division



Scott Smyth
Attorney-Legal Division
State Bar No. 18779450
(512) 936-7232 (telephone)
(512) 936-7268 (facsimile)
Brennan Foley
State Bar No. 24055490
Jason Haas
State Bar No. 24032386
Maria Faconti
State Bar No. 24078487
Public Utility Commission of Texas
1701 N. Congress Avenue
P. O. Box 13326
Austin, Texas 78711-3326

CERTIFICATE OF SERVICE

I certify that a copy of this document will be served on all parties of record on August 30, 2012, in accordance with P.U.C. Procedural Rule 22.74.



Scott Smyth

SOAH DOCKET NO. 473-12-7519
PUC DOCKET NO. 40443

DEFINITIONS AND INSTRUCTIONS

“Applicant,” “you,” or “SWEPCO” refers to Southwestern Electric Power Company, its parent, subsidiaries and affiliates, past and present; its employees, officers, directors, agents, consultants, investigators, representatives, attorneys, and all persons acting under contractual obligations with or acting or purporting to act on behalf of ETI; any merged or consolidated predecessors in interest or predecessor in interest; and any merged or consolidated successors in interest.

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.

**SOAH DOCKET NO. 473-12-7519
PUC DOCKET NO. 40443**

**COMMISSION STAFF'S SEVENTH REQUEST FOR INFORMATION
TO SOUTHWESTERN ELECTRIC POWER COMPANY (SWEPCO)
QUESTION NOS. STAFF 7-1 THROUGH STAFF 7-13**

- Staff 7-1** Please explain if SWEPCO is requesting a self-insurance reserve in this case for expensing potential catastrophic property losses that could not have been reasonably anticipated and included under operating and maintenance expenses.
- Staff 7-2** Referring to WP/A-2.1, page 5 (Bates 7490), a test year actual expense for property insurance (FERC Account 924) in the amount of \$3,025,817.58 is shown. Please summarize the expenses to this account, including a brief description of the charges along with the amount. Please explain if any self-insurance annual accruals have been included.
- Staff 7-3** Referring to Schedule A-4, page 12 (Bates 3389), please explain the credit of \$2,956,219.86 for Tree and Brush Control (Line No. 997) in FERC Account 593.
- Staff 7-4** Referring to Schedule A-4, page 12 (Bates 3389), please explain the expense of \$2,517,080.83 regarding Storm Expense Amortization (Line No. 998) in FERC Account 593.

Transmission Vegetation Management

- Staff 7-5** Does the company use outside contractors for vegetation management of their transmission system in Texas? If so, please provide the justification for using outside contractors instead of company employees. Please identify the number of SWEPCO employees directly responsible for the vegetation management of the company's transmission facilities in Texas.
- Staff 7-6** Please confirm that the number of circuit miles/line miles of transmission provided in response to Staff RFI 1-3 are all located in Texas. If not, please provide an updated table that reflects only the facilities that are located in Texas.
- Staff 7-7** Please identify the FERC Account for which SWEPCO is requesting an additional \$1.0 million in transmission vegetation management spending above the test year level of \$3.2 million.
- Staff 7-8** For the test year and each of the four years prior to the test year, please provide the following outage information for SWEPCO's transmission facilities located in Texas:
- a) Number of forced outages by voltage level.
 - b) Number of outages, by voltage level, that were related to vegetation.

- c) Number of outages, by voltage level, that were caused by trees outside the ROW.

Staff 7-9 For the test year and each of the four years prior to the test year, please provide the amount SWEPCO spent on vegetation management, by voltage level, in order to maintain ROWs in Texas. Additionally, for each year and voltage level, please provide the estimated miles of ROW that were maintained.

Distribution Vegetation Management

Staff 7-10 Does the company use outside contractors for vegetation management on distribution systems? If so, please provide the justification for using outside contractors instead of company employees. Please identify the number of SWEPCO employees responsible for the vegetation management of the company's distribution facilities in Texas.

Staff 7-11 Please identify the FERC Account for which SWEPCO is requesting an additional \$2.1 million in distribution vegetation management spending above the test year level of \$4.7 million.

Staff 7-12 Please identify the feeders (distribution circuits), by Feeder ID and Substation ID, on SWEPCO's Texas facilities that were targeted to have vegetation trimmed following the settlement in the last rate case as discussed on pages 11 and 12 of Mr. Albert Smoak's direct testimony. Please provide this information in MS Excel format. Additionally for each of the feeders, please include in the spreadsheet the approximate dates when vegetation trimming was started and completed.

Staff 7-13 For each of the distribution feeders identified in the previous question, please provide in MS Excel format the following information for the test year and two years prior to the test year:

- a) Monthly SAIDI and SAIFI values, taking all forced outages into consideration.
- b) Monthly SAIDI and SAIFI values, taking outages stemming from tree-related issues into consideration.
- c) Number of customers served.