



Control Number: 41439



Item Number: 31

Addendum StartPage: 0

SOAH DOCKET NO. 473-13-4067  
PUC DOCKET NO. 41439

2013 JUN 17 PM 2:59  
PUBLIC UTILITIES COMMISSION

APPLICATION OF SOUTHWESTERN § BEFORE THE STATE OFFICE  
ELECTRIC POWER COMPANY TO §  
ADJUST ENERGY EFFICIENCY COST § OF  
RECOVERY FACTOR AND RELATED §  
RELIEF § ADMINISTRATIVE HEARINGS

**SOUTHWESTERN ELECTRIC POWER COMPANY’S RESPONSE TO  
COMMISSION STAFF’S SIXTH REQUEST FOR INFORMATION**

**JUNE 17, 2013**

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**Question No. STAFF 6-1:**

Please provide a copy of all analyses, studies, or reports SWEPCO has acquired, performed or directed to be performed regarding changes in SWEPCO's customers' level of participation in energy efficiency programs resulting from changes in SWEPCO's EECRF customer classifications.

**Response No. STAFF 6-1:**

SWEPCO is unaware of any such analyses, studies, or reports.

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**Question No. STAFF 6-2:**

Please provide a copy of all analyses, studies, or reports SWEPCO has acquired, performed or directed to be performed regarding changes in SWEPCO's customers' level of participation in energy efficiency programs resulting from changes in SWEPCO's assignment and allocations of SWEPCO's energy efficiency costs.

**Response No. STAFF 6-2:**

SWEPCO is unaware of any such analyses, studies, or reports.

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**Question No. STAFF 6-3:**

Please provide a copy of all analyses, studies, or reports SWEPCO has acquired, performed or directed to be performed regarding changes in the energy efficiency program benefits received by SWEPCO's customers resulting from changes in SWEPCO's EECRF customer classifications.

**Response No. STAFF 6-3:**

SWEPCO is unaware of any such analyses, studies, or reports.

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**Question No. STAFF 6-4:**

Please provide a copy of all analyses, studies, or reports SWEPCO has acquired, performed or directed to be performed regarding changes in the energy efficiency program benefits received by SWEPCO's customers resulting from changes in SWEPCO's assignment and allocations of SWEPCO's energy efficiency costs.

**Response No. STAFF 6-4:**

SWEPCO is unaware of any such analyses, studies, or reports.

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**Question No. STAFF 6-5:**

Please provide a copy of all analyses, studies, or reports SWEPCO has acquired, performed or directed to be performed regarding inequities that result from changes in SWEPCO's EECRF customer classifications.

**Response No. STAFF 6-5:**

SWEPCO is unaware of any such analyses, studies, or reports.

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**Question No. STAFF 6-6:**

Please provide a copy of all analyses, studies, or reports SWEPCO has acquired, performed or directed to be performed regarding inequities that result from changes in SWEPCO's assignments and allocations of energy efficiency program costs.

**Response No. STAFF 6-6:**

SWEPCO is unaware of any such analyses, studies, or reports.

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**Question No. STAFF 6-7:**

Please provide a copy of all analyses, studies, or reports SWEPCO has performed or directed to be performed to quantify the direct benefit a participating customer receives from an energy efficiency program. If available, please provide the information by rate class and by program.

**Response No. STAFF 6-7:**

SWEPCO is unaware of any such analyses, studies, or reports.

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**Question No. STAFF 6-8:**

Please provide a copy of all analyses, studies, or reports SWEPCO has acquired, performed or directed to be performed to quantify the system benefit that a customer receives from SWEPCO's overall EE program. If available, please provide the information by rate class and by program.

**Response No. STAFF 6-8:**

SWEPCO is unaware of any such analyses, studies, or reports.

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**Question No. STAFF 6-9:**

Please provide a copy of all analyses, studies, or reports SWEPCO has performed or directed to be performed comparing the direct benefit received by a customer participating in SWEPCO's EE programs to the system benefits received by that customer as a result of SWEPCO's EE portfolio. If available, please provide the information by rate class and by program.

**Response No. STAFF 6-9:**

SWEPCO is unaware of any such analyses, studies, or reports.

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**Question No. STAFF 6-10:**

Please provide a copy of all analyses, studies, or reports SWEPCO has acquired, performed or directed to be performed regarding EECRF rate volatility.

**Response No. STAFF 6-10:**

The table below gives a historical record of the volatility in the EECRF charges since the implementation of the EECRF during the 2009 Program Year.

	PENDING					
	Docket 35625 for 2009	Docket 36961 for 2010	Docket 38210 for 2011	Docket 39359 for 2012	Docket 40357 for 2013	Docket 41439 for 2014
	per kWh	per kWh	per kWh	per kWh	per kWh	per kWh
Residential	\$ 0.000699	\$ 0.001154	\$ 0.001260	\$ 0.001247	\$ 0.001163	\$ 0.001262
Commercial	\$ 0.000484	\$ 0.000518	\$ 0.000573	\$ 0.000540		
General Service	\$ 0.000484	\$ 0.000518	\$ 0.000573	\$ 0.000540	\$ 0.000947	\$ 0.000912
Municipal Service	\$ 0.000484	\$ 0.000518	\$ 0.000573	\$ 0.000540	\$ 0.000040	\$ 0.001952
Municipal Pumping	\$ 0.000484	\$ 0.000518	\$ 0.000573	\$ 0.000540	\$ (0.000096)	\$ 0.000104
Lighting & Power	\$ 0.000484	\$ 0.000518	\$ 0.000573	\$ 0.000540	\$ 0.000810	\$ 0.000772
Industrial	\$ 0.000556	\$ 0.000595	\$ 0.000964	\$ 0.000176	\$ (0.000461)	\$ 0.003268
Lighting	\$ 0.000772	\$ 0.000826	\$ 0.000855	\$ (0.000660)	\$ (0.000763)	\$ (0.000052)

The General Service, Municipal Service, Municipal Pumping, and Lighting & Power rate classes were included within the Commercial rate class from 2009 through 2012. At Staff's suggestion, SWEPCO agreed to separate these rates classes beginning with 2013.

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**Question No. STAFF 6-11:**

Please provide a copy of all analyses, studies, or reports SWEPCO has acquired, performed or directed to be performed regarding the interaction between SWEPCO's assignment and allocation of EE costs and EECRF rate volatility.

**Response No. STAFF 6-11:**

Please see the response to STAFF 6<sup>th</sup> Request for Information, Question No. STAFF 6-10.

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**Question No. STAFF 6-12:**

Please provide a copy of all analyses, studies, or reports SWEPCO has acquired, performed or directed to be performed regarding the interaction between SWEPCO's EECRF customer classifications and EECRF rate volatility.

**Response No. STAFF 6-12:**

Please see the response to STAFF 6<sup>th</sup> Request for Information, Question No. STAFF 6-10.

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**Question No. STAFF 6-13:**

Please provide a copy of all analyses, studies, or reports SWEPCO has acquired, performed or directed to be performed regarding the costs to SWEPCO to modify SWEPCO's EECRF billing systems to assess SWEPCO's EECRF on a rate class basis.

**Response No. STAFF 6-13:**

SWEPCO does not have a separate EECRF billing system. Billing for the EECRF tariff and all other billed electric service charges is computed by the AEP Marketing Accounting Computer Service System. There are no analyses, studies, or reports regarding the costs to modify the billing system to assess the EECRF on a rate class basis.

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