

Control Number: 41538



Item Number: 11

Addendum StartPage: 0

**SOAH DOCKET NO. 473-13-4654  
PUC DOCKET NO. 41538**

<b>APPLICATION OF AEP TEXAS</b>	<b>§</b>	<b>BEFORE THE STATE OFFICE</b>
<b>CENTRAL COMPANY TO ADJUST</b>	<b>§</b>	
<b>ENERGY EFFICIENCY COST</b>	<b>§</b>	<b>OF</b>
<b>RECOVERY FACTOR AND</b>	<b>§</b>	
<b>RELATED RELIEF</b>	<b>§</b>	<b>ADMINISTRATIVE HEARINGS</b>

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**STEERING COMMITTEE OF CITIES  
SERVED BY AEP TEXAS CENTRAL COMPANY'S  
FIRST REQUEST FOR INFORMATION  
TO AEP TCC**

The Steering Committee of Cities Served by AEP Texas Central Company ("Cities") files this first information request to AEP Texas Central Company ("AEP TCC" or "Company") in the above-styled docket. AEP TCC is hereby requested to furnish one copy of all items of information enumerated on the attached sheets directly to the offices of Lloyd Gosselink Rochelle & Townsend, P.C., 816 Congress Avenue, Suite 1900, Austin, Texas 78701, (512) 322-5800, the undersigned attorney, within ten (10) calendar days. These requests shall be deemed continuing so as to require further and supplemental responses if AEP TCC receives or generates additional information within the scope of these requests between the time of the original response and the time of the hearing. Also, where data is requested, provide it in hard copy and Excel format with all formats intact.

**DEFINITIONS AND INSTRUCTIONS**

A. 'AEP Texas Central Company' or 'AEP TCC' refers to its parents, affiliates and subsidiaries, and any person acting or purporting to act on its behalf, including without limitation, attorneys, agents, advisors, investigators, representatives, employees or other persons.

B. The term 'document' shall have the broadest meaning possible under the Texas Rules of Civil Procedure and shall include, but not be limited to, the original (or a copy when the original is not available), each non-identical copy (including those which are non-identical by reason of notations or marking, or by appearing in the files of a separate person), and any books, notebooks, pamphlets, periodicals, letters, reports, memoranda, handwritten notes, notations, messages, telegrams, wires, cables, press or news wire releases, records, studies, analyses, summaries, magazines, booklets, circulars, catalogs, bulletins, instructions, operating or

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maintenance manuals, operating or product specifications, fabrication sheets, test data, design specifications, parts lists, calendars, day-timers, notes or records of meetings, notices, purchase orders, bills, ledgers, checks, tabulations, questionnaires, surveys, drawings, sketches, schematics, blueprints, flow sheets, working papers, charts, graphs, indices, tapes, agreements, releases, appraisals, valuations, estimates, opinions, financial statements, accounting records, income statements, photographs, films or videotapes, back-up tapes, minutes, contracts, leases, invoices, records of purchase or sale, correspondence, electronic or other transcription or tapings of or notes pertaining to telephone or personal conversations or conferences, tape recordings, electromagnetic recordings, voice mail message or transcriptions thereof, interoffice communications of all types, e-mail messages, printouts of e-mail messages, instant messages or printouts thereof, microfilms, electronic databases, CDs, DVDs, videotapes or cassettes, films, movies, computer printouts and any and all other written, printed, typed, punched, engraved, taped, filmed, recorded (electronically or otherwise), labeled, or graphic matter, of whatever description, however produced or reproduced (including computer-stored or generated data, together with instructions or programs necessary to search and retrieve such data), and shall include all attachments to (including tangible things) and enclosures with (including tangible things) any requested item, to which they are attached or with which they are enclosed, and each draft thereof. A draft of a non-identical copy is a separate document within the meaning of this term. An electronic copy of a paper documents is a separate document within the meaning of this term.

C. Pursuant to Rule 196.4 of the Texas Rules of Civil Procedure, Cities 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 and/or Word Perfect and be produced with your response to these requests. Cities further request that AEP TCC produce electronic copies of all paper documents, including any metadata attached to such documents, and produce all electronic originals or all responsive documents.

D. The terms 'and' and 'or' shall be construed both disjunctively and conjunctively as necessary to make the request inclusive rather than exclusive.

E. 'Each' shall be construed to include the word 'every' and 'every' shall be construed to include the word 'each.'

F. 'Any' shall be construed to include 'all' and 'all' shall be construed to include 'any.'

G. The term 'concerning,' or one of its inflections, includes the following meanings: relating to; referring 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.

H. The term 'including,' or one of its inflections, means and refers to 'including but not limited to.'

I. 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.

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

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

L. 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.

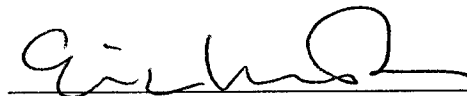
M. If the information requested is included in previously furnished exhibits, workpapers, responses to other discovery inquiries or otherwise, in hard copy or electronic format, please furnish specific references thereto, including Bates Stamp page citations and detailed cross references.

Respectfully submitted,

**LLOYD GOSSELINK ROCHELLE  
& TOWNSEND, P.C.**

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EILEEN L. MCPHEE  
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ATTORNEYS FOR STEERING COMMITTEE  
OF CITIES SERVED BY AEP TEXAS CENTRAL  
COMPANY

### CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was transmitted by facsimile, e-mail and/or regular, first class mail on this 11<sup>th</sup> day of June, 2013, to the parties of record.



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EILEEN L. MCPHEE

**SOAH DOCKET NO. 473-13-4654**  
**PUC DOCKET NO. 41538**

**CITIES FIRST**  
**RFI TO AEP TCC**

- Cities 1-1. Please provide in native format (Excel or Word) each of the tables contained in the Company's Revised 2013 Energy Efficiency Plan and Report (filed in Project No. 41196). For any graphical presentations, include the underlying data.
- Cities 1-2. Please provide in native format (Excel or Word) each of the workpapers supporting the schedules of Jennifer Jackson.
- Cities 1-3. (Please refer to the Direct Testimony of Billy Berny at 21 and 22) TCC has historically funded, and proposes continued funding, research and development ("R&D") projects to develop and implement upgrades to the Company's electronic data collection and management systems. Please provide a detailed chronology of upgrade efforts including all prior year expenditures and a project timeline identifying anticipated completion date(s) and total projected costs related to this effort.
- Cities 1-4. (Please refer to the Direct Testimony of Billy Berny at 21 and 22) Please provide the amount spent on R&D projects to develop and implement upgrades to the Company's electronic data collection and management systems, and explain why these costs should be recovered in the Company's energy efficiency cost recovery factor and not base rates.
- Cities 1-5. (Please refer to the Direct Testimony of Pamela Osterloh at 14) Please elaborate on the development of the Open MTP.
- a. What specifically lead to the development of this program?
  - b. How were the incentive and administrative budgets developed?
  - c. Please provide any benefit/cost or other analyses supporting this program.
- Cities 1-6. (Please refer to the Direct Testimony of Pamela Osterloh at 26-27) Please provide receipts supporting any expenses requested for recovery in the 2009 through 2012 energy efficiency programs associated with:
- a. Outreach meetings, program marketing, or other similar contacts with energy efficiency service providers or third-party contractors;
  - b. Energy efficiency-related conferences and other similar meetings attended by AEP TCC personnel; and
  - c. Entertainment, meals, or travel expenses not otherwise identified in (a) or (b).

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- Cities 1-7. (Please refer to Schedule L) Please provide a program of events and copies of materials provided to REPs at the annual communications workshop hosted by the Competitive Retail Relations Department. Identify all costs associated with this workshop that are requested for recovery in the proposed EECRF.
- Cities 1-8. (Please refer to the Direct Testimony of Jeffrey Hoersdig at 12) Please explain why the number of customers is the appropriate affiliate allocation methodology to assign energy efficiency program costs, which have the goal of reducing kW and kWh, between affiliates. Please provide alternative allocation of 2012 affiliate costs using both kWh sales and contribution to the ERCOT 4CP.
- Cities 1-9. (Please refer to the Direct Testimony of Jeffrey Hoersdig at 14) Please explain why the number of customers is the appropriate affiliate allocation methodology to assign energy efficiency program costs, which have the goal of reducing kW and kWh, between affiliates. Please provide alternative allocation of 2009, 2010, and 2011 affiliate costs using both kWh sales and contribution to the ERCOT 4CP.
- Cities 1-10. (Please refer to the Direct Testimony of Jennifer Jackson) Are the 2012 kWh and kW billing units shown on Schedules H and I adjusted for customer growth and weather? If not, why not?
- Cities 1-11. (Please refer to the Direct Testimony of Jennifer Jackson) Please explain the decrease in kWh from 24,030,043,216 in 2012 to the 2014 projected 23,967,311,852 shown on Schedule H.
- Cities 1-12. (Please refer to the Direct Testimony of Jennifer Jackson) Are projected 2014 kWh developed by class of service or in total and prorated based on historic 2012 billing units?
- Cities 1-13. (Please refer to the Direct Testimony of Jennifer Jackson) Please provide documentation and an explanation of how the Customer ID Notice kWh were calculated for Schedule H.
- Cities 1-14. (Please refer to the Direct Testimony of Jennifer Jackson) Please provide workpapers developing the projected 2014 billing units.
- Cities 1-15. (Please refer to the Direct Testimony of Jennifer Jackson) For each class of service, please provide a comparison of projected kWh in the 2009, 2010, 2011, and 2012 EECRF filings with the subsequently recorded actual billing units.

**CITIES FIRST**  
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- Cities 1-16. Attachment 5 and Schedule C illustrate that the Company's EECRF has consistently over-recovered costs in excess of two million dollars per year. Has the Company performed any analyses to determine the cause of the over-recovery? If no, does the Company have an opinion addressing the cause of the consistent over-recovery?
- Cities 1-17. Does the over-recovery refund include interest on the over-recovered amount?