



Control Number: 41538



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

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PUBLIC UTILITY COMMISSION
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APPLICATION OF AEP TEXAS	§	PUBLIC UTILITY COMMISSION
CENTRAL COMPANY TO ADJUST	§	
ENERGY EFFICIENCY COST	§	OF TEXAS
RECOVERY FACTOR AND RELATED	§	
RELIEF	§	

**COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION TO
AEP TEXAS CENTRAL COMPANY
QUESTION NOS. STAFF 1-1 THROUGH STAFF 1-9**

Pursuant to § 22.144 of the Commission's Procedural Rules, the Staff of the Public Utility Commission of Texas (Staff) requests that AEP Texas Central Company (AEP TCC or the "Company") by and through its attorneys of record, provide the following information and answer the following question(s) under oath. The question(s) shall be answered in sufficient detail to fully present all of the relevant facts, within the time limit provided by the Presiding Officer or within 20 days, if the Presiding Officer has not provided a time limit. Please copy the question immediately above the answer to each question. These question(s) are continuing in nature, and if there is a relevant change in circumstances, submit an amended answer, under oath, as a supplement to your original answer. State the name of the witness in this cause who will sponsor the answer to the question and can vouch for the truth of the answer.

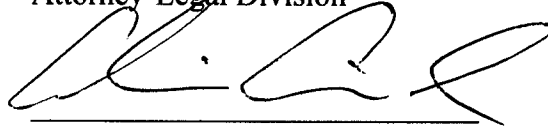
Provide an original and three copies of your answers to the questions to the Filing Clerk, Public Utility Commission of Texas, 1701 N. Congress Avenue, P.O. Box 13326, Austin, Texas 78711-3326.

Dated: June 7, 2013

Respectfully Submitted,

Margaret Uhlig Pemberton
Division Director-Legal Division

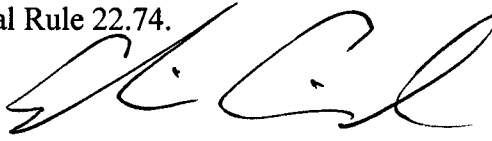
Joseph P. Younger
Attorney-Legal Division

A handwritten signature in black ink, appearing to read 'A. Eissler', written over a horizontal line.

Adrian Eissler
Attorney, Legal Division
State Bar No. 24074170
(512) 936-7442 (telephone)
(512) 936-7268 (facsimile)
Public Utility Commission of Texas
1701 N. Congress Avenue
P.O. Box 13326
Austin, Texas 78713326

CERTIFICATE OF SERVICE

I certify that a copy of this document will be served on all parties of record on June 7, 2013, in accordance with P.U.C. Procedural Rule 22.74.

A handwritten signature in black ink, appearing to read 'A. Eissler', written over a horizontal line.

Adrian Eissler

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DEFINITIONS

- A. "AEP TCC", "the Company" or "you" refers to **AEP Texas Central Company** and any person acting or purporting to act on their behalf, including without limitation, attorneys, agents, advisors, investigators, representatives, employees or other persons.
- B. "Document" includes any written, recorded, or graphic matter, however produced or reproduced, including but not limited to correspondence, telegrams, contracts, agreements, notes in any form, memoranda, diaries, voice recording tapes, microfilms, pictures, computer media, work papers, calendars, minutes of meetings or other writings or graphic matter, including copies containing marginal notes or variations of any of the foregoing, now or previously in your possession. In the event any documents requested by this Request for Information have been transferred beyond the Company's control, describe the circumstances under which the document was destroyed or transferred and provide an exact citation to the subject document. In the event that documents containing the exact information do not exist, but documents do exist which contain portions of the required information or which contain substantially similar information, then the definition of "documents" shall include the documents which do not exist and these documents will be provided.

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INSTRUCTIONS

- 1) Pursuant to P.U.C. Proc. R. 22.144(c)(2), Staff requests that answers to the requests for information be made under oath.
- 2) Please copy the question immediately above the answer to each question. State the name of the witness in this cause who will sponsor the answer to the question and can vouch for the truth of the answer.
- 3) These questions are continuing in nature, and if there is a relevant change in circumstances, submit an amended answer, under oath, as a supplement to your original answer.
- 4) 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.
- 5) The present tense shall be construed to include the past tense, and the past tense shall be construed to include the present tense.
- 6) 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.
- 7) Pursuant to P.U.C. Proc. R. 22.144(g)(4), if the response to any request is voluminous, please provide a detailed index of the voluminous material.
- 8) Staff requests that each item of information be made available as it is completed, rather than upon completion of all information requested.
- 9) Pursuant to P.U.C. SUBST. R. 26.417(f)(2)(A)(iii) and 26.418(g)(2)(A)(iii), responses to requests for information shall be provided to the commission staff and the Office of Public Utility Counsel within ten days after receipt of the request by the applicant.

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QUESTION NOS. STAFF 1-1 THROUGH STAFF 1-9**

STAFF 1-1 Please provide the information below for each of the following rate classes: Residential, Secondary Voltage Service Less Than or Equal to 10kW, Secondary Voltage Service Less Greater Than 10kW, Primary Voltage Service, Transmission Voltage Service, and Lighting Service. Please provide in Microsoft Excel format, if available. If Microsoft Excel format is *not* available, please provide the information in a native format:

- 1) Actual program year 2012 kWh usage by month by rate class for:
 - a. Metered non-profit or government entity customers;
 - b. Metered customers that are for-profit entities engaged in an *industrial* process;
 - c. Metered customers that are for-profit entities engaged in an *industrial* process that qualify for a tax exemption under Tax Code § 151.317 and have submitted an identification notice pursuant to P.U.C. SUBST. R. 25.181(w); and
 - d. Non-metered customers; and
 - e. Total rate class.
- 2) Actual program year 2012 class demand coincident with ERCOT 4CP demand by rate class for:
 - a. Metered non-profit or government entity customers;
 - b. Metered customers that are for-profit entities engaged in an *industrial* process;
 - c. Metered customers that are for-profit entities engaged in an *industrial* process that qualify for a tax exemption under Tax Code § 151.317 and have submitted an identification notice pursuant to P.U.C. SUBST. R. 25.181(w); and
 - d. Non-metered customers; and
 - e. Total rate class.
- 3) For each rate class, the sum of customers' non-coincident peak demands in the actual program year 2012 by month:
 - a. Metered non-profit or government entity customers;
 - b. Metered customers that are for-profit entities engaged in an *industrial* process;
 - c. Metered customers that are for-profit entities engaged in an *industrial* process that qualify for a tax exemption under Tax Code

- § 151.317 and have submitted an identification notice pursuant to P.U.C. SUBST. R. 25.181(w); and
- d. Non-metered customers; and
 - e. Total rate class.
- 4) Actual program year 2012 billable demand by month by rate class for:
- a. Metered non-profit or government entity customers;
 - b. Metered customers that are for-profit entities engaged in an *industrial* process;
 - c. Metered customers that are for-profit entities engaged in an *industrial* process that qualify for a tax exemption under Tax Code § 151.317 and have submitted an identification notice pursuant to P.U.C. SUBST. R. 25.181(w); and
 - d. Non-metered customers; and
 - e. Total rate class.
- 5) Actual program year 2012 number of customer bills by month by rate class for:
- a. Metered non-profit or government entity customers;
 - b. Metered customers that are for-profit entities engaged in an *industrial* process;
 - c. Metered customers that are for-profit entities engaged in an *industrial* process that qualify for a tax exemption under Tax Code § 151.317 and have submitted an identification notice pursuant to P.U.C. SUBST. R. 25.181(w); and
 - d. Non-metered customers; and
 - e. Total rate class.
- 6) The amount of energy efficiency costs TCC's base rates were set to collect by rate class for:
- a. Metered non-profit or government entity customers;
 - b. Metered customers that are for-profit entities engaged in an *industrial* process;
 - c. Metered customers that are for-profit entities engaged in an *industrial* process that qualify for a tax exemption under Tax Code § 151.317 and have submitted an identification notice pursuant to P.U.C. SUBST. R. 25.181(w); and
 - d. Non-metered customers; and
 - e. Total rate class.
- 7) Forecasted program year 2014:
- a. kWh usage by month by rate class for
 - i. eligible customers; and
 - ii. ineligible customers.

- b. Sum of customers' non-coincident peak demands by month by rate class for
 - i. eligible customers; and
 - ii. ineligible customers.
 - c. Number of customer bills by rate class for
 - i. eligible customers; and
 - ii. ineligible customers.
 - 8) For each 2012 program, the total dollar amount for each of the following types of expenses directly assigned to each of the above-listed *rate classes*, and a justification for such direct assignment:
 - a. Incentive;
 - b. Administrative;
 - c. Research & Development;
 - d. Evaluation, Measurement & Verification;
 - e. Municipal rate case expenses;
 - f. Utility rate case expenses;
 - g. Performance bonus;
 - h. Any additional costs and/or expenditures the Company requests to recover through the EECRF.
 - 9) The total dollar amount for each of the following types of expenses directly assigned to each 2012 *program*, and a justification for such direct assignment:
 - a. Incentive;
 - b. Administrative;
 - c. Research & Development;
 - d. Evaluation, Measurement & Verification;
 - e. Municipal rate case expenses;
 - f. Utility rate case expenses;
 - g. Performance bonus;
 - h. Any additional costs and/or expenditures the Company requests to recover through the EECRF.
 - 10) For each 2012 program, the total dollar amount for each of the following types of expenses allocated among the above-listed *rate classes*, a justification for allocating instead of directly assigning those costs to each of the above-listed rate classes, a complete explanation of the allocation methodology, work papers supporting the calculation of the allocation factors, and a justification for the proposed allocation basis:
 - a. Incentive;
 - b. Administrative;
 - c. Research & Development;

- d. Evaluation, Measurement & Verification;
 - e. Municipal rate case expenses;
 - f. Utility rate case expenses;
 - g. Performance bonus;
 - h. Any additional costs and/or expenditures the Company requests to recover through the EECRF.
- 11) The total dollar amount for each of the following types of expenses allocated among the 2012 *programs*, a justification for allocating instead of directly assigning those costs to each program, a complete explanation of the allocation methodology, work papers supporting the calculation of the allocation factors, and a justification for the proposed allocation basis:
- a. Administrative;
 - b. Research & Development;
 - c. Evaluation, Measurement & Verification;
 - d. Municipal rate case expenses;
 - e. Utility rate case expenses;
 - f. Performance bonus;
 - g. Any additional costs and/or expenditures the Company requests to recover through the EECRF.
- 12) In native format, actual 2012 energy efficiency revenues collected through base rates and 2014 budgeted energy efficiency revenues expected to be collected through base rates for each of the above listed *rate classes*.
- 13) 2014 energy efficiency revenues expected to be collected through base rates for each of the above-listed *rate classes*.
- 14) Actual 2012 revenues collected through the Company's Rider EECRF for each of the above-listed *rate classes* for:
- a. Metered non-profit or government entity customers;
 - b. Metered customers that are for-profit entities engaged in an *industrial* process;
 - c. Metered customers that are for-profit entities engaged in an *industrial* process that qualify for a tax exemption under Tax Code § 151.317 and have submitted an identification notice pursuant to P.U.C. SUBST. R. 25.181(w); and
 - d. Non-metered customers; and
 - e. Total rate class.
- 15) A list of which of the Company's base rate classes will be eligible for each of the Company's proposed 2014 programs.
- 16) A list of which of the Company's base rate classes received services under each of the programs 2012 programs.

- 17) Projected incentive disbursement by rate class for each of the Company's proposed 2014 programs, and with an explanation for the Company's rationale for such projections.

STAFF 1-2 Please comprehensively describe the methodology the Company utilized to adjust the amount of energy efficiency costs expressly included in base rates to account for changes in billing determinants from the test year billing determinants used to set rates in the last base rate proceeding. In response to this question, please also include an active electronic copy in MS Excel or compatible format with links and formulas intact of the work papers that support the adjustment, and separated for the 2012 historical year and the 2014 budgeted year.

STAFF 1-3 Please provide work papers supporting the Company's calculations of:

- 1) The residential and non-residential cost caps approved in the 2011 EECRF proceedings for the Company's 2012 budgeted and 2010 actual programs;
- 2) The residential and non-residential cost caps from the 2012 EECRF proceedings for the Company's 2013 budgeted and 2011 actual programs; and,
- 3) The actual 2012 residential and non-residential per-kWh cost cap rate based on actual 2012 program costs subject to the cap and actual 2012 billing determinants.

STAFF 1-4 Please provide a narrative description of the rationale behind TCC's decision to set per-kWh EECRF rates rather than per-kW EECRF rates for each of TCC's rate classes that are billed on a demand basis.

STAFF 1-5 Please provide a comprehensive narrative description of the activities TCC has performed to comply with Ordering Paragraph No. 3 from the final order in P.U.C. Docket No. 39360.

STAFF 1-6 Please refer to Ordering Paragraph No. 3 from the final order in P.U.C. Docket No. 39360. For each of the following types of expense, please provide the actual energy-efficiency program costs on a rate class basis: actual 2012 incentive payments, actual 2012 administrative costs, actual 2012 research & development costs.

STAFF 1-7 Please provide an estimate of the cost to TCC to implement a non-ratcheted demand charge for TCC's EECRFs for non-residential rate classes that are billed on a demand basis.

STAFF 1-8 For each energy efficiency contractor that provides services to TCC's customers through TCC's non-residential market transformation programs (e.g., CLEAResult), please provide the following information by contractor by month:

- Contractor's fees categorized as "incentive costs" in the Company's application by contractor by month by MTP program;

- Contractor's fees categorized as "administrative costs" in the Company's application by contractor by month by MTP program; and
- Number of participating customers by contractor by month by MTP program by rate class.

STAFF 1-9 Please provide work papers supporting the TCC's assignment and allocation of incentive costs for TCC's non-residential MTP programs among TCC's non-residential rate classes. Please include work papers supporting the calculation of all allocation factors.