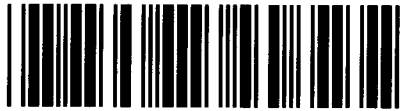


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SOAH DOCKET NO. 473-13-4654
PUC DOCKET NO. 41538

2013 JUN -7 PM 2:36

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

COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION TO
AEP TEXAS CENTRAL COMPANY
QUESTION NOS. STAFF 2-1 THROUGH STAFF 2-10

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.

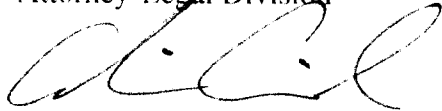
Provide an original and three copies of your answers to the questions to the Filing Clerk, Public Utility Commission of Texas, 1701 N. Congress Avenue, P.O. Box 13326, Austin, Texas 78711-3326.

Dated: June 7, 2013

Respectfully Submitted,

Margaret Uhlig Pemberton
Division Director-Legal Division

Joseph P. Younger
Attorney-Legal Division



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.



Adrian Eissler

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

**COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION TO
AEP TEXAS CENTRAL COMPANY
QUESTION NOS. STAFF 2-1 THROUGH STAFF 2-10**

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.

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

**COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION TO
AEP TEXAS CENTRAL COMPANY
QUESTION NOS. STAFF 2-1 THROUGH STAFF 2-10**

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.

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

**COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION TO
AEP TEXAS CENTRAL COMPANY
QUESTION NOS. STAFF 2-1 THROUGH STAFF 2-10**

- STAFF 2-1** Is the Company requesting the EECRF net of energy efficiency costs included in base rates?
- STAFF 2-2** If your answer to Staff 2-1 is yes, please provide the EECRF amounts (individual component costs) included in base rates. In addition, please provide the FERC accounts and the amounts included in base rates for the years being reconciled, current and proposed rider.
- STAFF 2-3** Please define the EECRF costs included in bases rates by component. In addition, please justify why these EECRF costs need to be in base rates.
- STAFF 2-4** Please identify all the individual administrative costs by **rate class** included in the reconciled, current and proposed EECRF rider. In addition, please create a schedule for the respective years that the Company is seeking recovery and explain the increase and/or decrease from one year to the next.
- STAFF 2-5** Please identify all the different types of incentive performance bonus costs incurred directly and/or allocated that are included in the EECRF by **rate class** for the reconciled, current and proposed riders. In addition, please separate all incentives bonuses measured by operational and financial performance.
- STAFF 2-6** Please provide a reconciliation of all the EECRF costs included in base rates and the rider on an annual basis for the period reconciled, current and proposed riders. If any of the periods referenced exceed the establish costs caps, please provide a detailed justification.
- STAFF 2-7** Did the Company make any affiliate payments during the reconciled or current period within the EECRF? If yes, please identify the different types of services obtained and/or products purchased that created these affiliate transactions.
- STAFF 2-8** If your answer to Staff 2-7 is yes, please provide the Company's analysis that the price paid for services and/or products was not greater than the current market fees.
- STAFF 2-9** Please provide a summary (vendor's name, date of contract, expiration date, types of contracts, percentage ownership, and monthly/annual costs) of the affiliate contracts by product and/or services for the reconciled, current and proposed EECRF riders.

STAFF 2-10 Is the Company requesting any rate case expenses in the EECRF proceeding for prior, current or future periods? If yes, please provide all the supporting documentation for the rate case expense by service (legal, accounting & etc.) and docket number. In addition, please provide copies of all the engagement agreements.