



Control Number: 41538



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

**APPLICATION OF AEP TEXAS  
CENTRAL COMPANY TO ADJUST  
ENERGY EFFICIENCY COST  
RECOVERY FACTOR AND RELATED  
RELIEF**

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**BEFORE THE  
STATE OFFICE OF  
ADMINISTRATIVE HEARINGS**

2013 JUN 10 PM 1:31  
PUBLIC UTILITY  
FILED CLEAR

**STEERING COMMITTEE OF CITIES  
SERVED BY AEP TEXAS CENTRAL COMPANY'S  
LIST OF ISSUES**

COMES NOW, the Steering Committee of Cities Served by AEP Texas Central Company ("Cities"), and files this list of issues pursuant to the Order of Referral dated June 3, 2013. Cities would respectfully show as follows:

**I. INTRODUCTION**

Cities present this list of issues based solely on a preliminary analysis of AEP Texas Central Company's ("TCC" or "Company") application for approval of an Energy Efficiency Cost Recovery Factor ("EECRF"). Cities anticipate that a more detailed review of the filing may result in the identification of additional issues. Accordingly, Cities reserve the right under the Administrative Procedure Act<sup>1</sup> to submit evidence and argument on each and every issue raised by TCC's filing, regardless of whether or not the issues are specifically identified in this pleading.

**II. LIST OF ISSUES**

Cities intend to investigate the following issues:

1. Whether TCC properly calculated its demand and energy goals applicable to 2014.

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<sup>1</sup> Administrative Procedure Act, TEX. GOV'T CODE ANN. § 2001.051(2) (West 2008 & Supp. 2012) ("APA").

2. Whether TCC's projected program incentive costs are reasonable and necessary and comply with the Public Utility Regulatory Act ("PURA") and Public Utility Commission ("PUC" or "Commission") rules.

3. Whether any of TCC's projected program costs or costs recovered from prior program years result in payments to an affiliate and if so, whether those costs meet the requirements for affiliate expenses in PURA § 36.058.

4. Whether the costs recovered by the Company through its EECRF for all prior program years complied with PURA and P.U.C. SUBST. R. 25.181 and were reasonable and necessary to reduce energy and demand costs.

5. Whether TCC's calculation of a performance bonus is reasonable and consistent with P.U.C. SUBST. R. 25.181.

6. Whether TCC's incurred and projected expenditures for administrative costs and research and development costs are reasonable and necessary and comply with PURA and Commission rules.

7. Whether TCC's proposed EECRF complies with the rate caps required by P.U.C. SUBST. R. 25.181.

8. Whether the customer classifications proposed by TCC are appropriate in setting TCC's EECRF rates.

9. What is the proper treatment of costs and revenues associated with energy efficiency costs included in TCC's base rates?

10. Whether the projected billing determinants for TCC's proposed 2014 EECRF are reasonable and accurate.

11. If TCC has received identification notices under P.U.C. SUBST. R. 25.181(w), whether TCC's demand reduction goal for program year 2014 has been accurately adjusted to remove any load lost as a result of the identification notices submitted to TCC.

12. Whether Cities' rate case expenses incurred in TCC's previous EECRF proceeding were reasonable.

WHEREFORE, PREMISES CONSIDERED, Cities request that these issues be included in any preliminary order issued by the PUC in this case. Further, Cities request that the preliminary order include language, historically included in PUC preliminary orders, that the list

of issues is preliminary and parties are not precluded from identification and presentation of other issues relevant to TCC's application.

Respectfully submitted,

**LLOYD GOSSELINK ROCHELLE  
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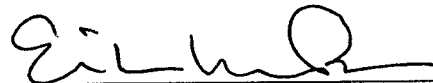
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ATTORNEYS FOR THE STEERING  
COMMITTEE OF CITIES SERVED BY AEP  
TEXAS CENTRAL COMPANY

**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 10<sup>th</sup> day of June, 2013, to the parties of record.



EILEEN L. MCPHEE