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

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PUBLIC UTILITY COMMISSION
FILING CLERK

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

COMMISSION STAFF'S PROPOSED LIST OF ISSUES

COMES NOW the staff (Staff) of the Public Utility Commission of Texas (Commission), representing the public interest and files this proposed list of issues.

I. LIST OF ISSUES

Staff has identified the following issues that should be addressed in this proceeding. These issues are stated in a neutral manner such that the Commission may consider arguments raised and evidence presented by all parties in this case. This is important because if the issue is stated to refer only to the applicant's request, the issue could be interpreted to allow consideration of only the applicant's request without taking the viewpoints of other parties into account. Staff has previously made this point in filing proposed lists of issues, which the Commission has implicitly accepted in issuing preliminary orders.¹

1. Does AEP Texas Central Company's (AEP TCC's or the utility's) EECRF application comply with P.U.C. SUBST. R. 25.181, including containing the testimony and schedules required by P.U.C. SUBST. R. 25.181(f)(10) and addressing the factors required by P.U.C. SUBST. R. 25.181?
2. What are the reasonable cost estimates for AEP TCC's 2014 energy-efficiency program in accordance with P.U.C. SUBST. R. 25.181 and PURA § 39.905?

¹ See e.g. *Application of Entergy Texas, Inc. for Authority to Redetermine Rates for the Energy Efficiency Cost Recovery Factor Tariff*, Docket No. 41444, Commission Staff's List of Issues at 1-3 (May 9, 2013) and Preliminary Order at 2-7 (May 24, 2013); *Application of Southwestern Electric Power Company to Adjust Energy Efficiency Cost Recovery Factor and Related Relief*, Docket No. 40357, Commission Staff's List of Issues at 1-2 (May 8, 2012) and Preliminary Order at 2-4 (May 23, 2012); *Application of El Paso Electric Company to Change Rates and Reconcile Fuel Costs*, Docket No. 40094, Commission Staff's List of Issues at 1-2 (Feb. 15, 2012) and Preliminary Order at 2-7 (Mar. 8, 2012); and *Application of Entergy Texas, Inc. for Authority to Change Rates and Reconcile Fuel Costs*, Docket No. 39896, Commission Staff's Proposed List of Issues at 1-2 (Dec. 6, 2011) and Preliminary Order 2-5 (Dec. 19, 2011).

- a. Do the projected costs of administration of the program exceed 15% of the total program costs?
 - b. Do the projected costs of research and development exceed 10% of the total program costs?
 - c. Do the projected cumulative costs of administration and research and development exceed 20% of total program costs?
 - d. Do the projected incentive payments for each customer class comply with P.U.C. SUBST. R. 25.181(g)?
3. Has AEP TCC properly calculated its proposed 2014 demand reduction goal?
4. What customer classifications are appropriate in setting AEP TCC's EECRF rates? Has AEP TCC shown good cause for any class combination in accordance with P.U.C. SUBST. R. 25.181(f)(2)?
5. What is the proper allocation and/or assignment of projected 2014 EECRF program costs in compliance with P.U.C. SUBST. R. 25.181(f)(2)?
6. What, if any, amount of utility and/or municipal rate case expenses for the immediately previous EECRF proceeding is reasonable and necessary? If there is any amount of utility and/or municipal rate case expenses that is determined to be reasonable and necessary, how should those costs be assigned or allocated among the rate classes?
7. What is the proper treatment of costs and revenues associated with energy efficiency costs included in AEP TCC's base rates, if any, consistent with P.U.C. SUBST. R. 25.181, PURA § 39.905, and prior Commission Orders?
8. What calculations of any under- or over-recovery of AEP TCC's EECRF revenues, if any, are correct and consistent with P.U.C. SUBST. R. 25.181 and PURA § 39.905?
9. For energy efficiency achievements in program year 2012, what energy-efficiency performance bonus for AEP TCC, if any, is consistent with P.U.C. SUBST. R. 25.181 and PURA § 39.905? What is the proper assignment or allocation of the performance bonus, if any, among ratepayers?
10. What are the proper assignments and allocations of AEP TCC's actual 2012 EECRF program year costs, consistent with P.U.C. SUBST. R. 25.181 and PURA § 39.905? Are AEP TCC's program costs directly assigned to each rate class that receives services under the programs to the maximum extent reasonably possible?
11. What were the reasonable costs (including administrative costs) of AEP TCC obtaining additional commercial load curtailment during the 2012 summer peak period pursuant to its agreement with Commission Staff and the Office of Public Utility Counsel? Does AEP TCC's request in this proceeding for recovery of the costs related to the additional commercial load curtailment comply with the agreement as filed in Docket No. 39360 on February 6, 2012?

12. What are the reasonable estimated billing determinants for AEP TCC's proposed 2014 EECRF?
13. What system losses and line losses should be used in calculating the utility's EECRF?
14. What are the properly calculated 2014 EECRF rates for AEP TCC, in accordance with P.U.C. SUBST. R. 25.181?
 - a. Do the calculated rates comply with the caps prescribed in P.U.C. SUBST. R. 25.181(f)(7)?
 - b. If not, has AEP TCC demonstrated that compliance with the budget cap is not reasonably possible and that good cause supports the Commission establishing a revised cap other than that specified in P.U.C. SUBST. R. 25.181(f)(7)?
15. What is the proper allocation and/or assignment of AEP TCC's Evaluation, Measurement, and Verification 2013 and 2014 costs among AEP TCC's rate classes?
16. Has AEP TCC made any payments for expenses to affiliates? If so, for each item or class of items, does the payment conform to the requirements in PURA §36.058?
17. Are costs appropriately assigned to the utility and its affiliates? Has the utility met the standard of recovery of affiliate costs under PURA §36.058 and Commission requirements?
18. What tariff schedule should be adopted for AEP TCC, in compliance with P.U.C. SUBST. R. 25.181?

II. ISSUES NOT TO BE ADDRESSED

Staff has not identified any issues not to be addressed. Staff reserves the right to address any additional issues relevant in this proceeding.

DATE: June 10, 2013

Respectfully Submitted,

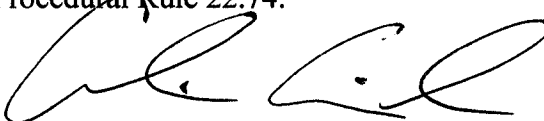
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CERTIFICATE OF SERVICE

I certify that a copy of this document will be served on all parties of record today,
June 10, 2013, in accordance with P.U.C. Procedural Rule 22.74.



Adrian Eissler