



Control Number: 42508



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SOAH DOCKET NO. 473-14-3894
PUC DOCKET NO. 42508

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FILING CLERK

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

COMMISSION STAFF'S THIRD REQUEST FOR INFORMATION TO
AEP TEXAS CENTRAL COMPANY
QUESTION NOS. STAFF 3-1 THROUGH STAFF 3-2

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 (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 27, 2014

Respectfully Submitted,

Joseph P. Younger
Division Director-Legal Division

Shelah J. Cisneros
Managing Attorney-Legal Division

Maia Faconti w/permission
Maia Faconti *Marie Reyna*
Attorney-Legal Division
State Bar No. 24078487
(512) 936-7235
(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 27, 2014, in accordance with P.U.C. Procedural Rule 22.74.

Maia Faconti w/permission
Maia Faconti *Marie Reyna*

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**COMMISSION STAFF'S THIRD REQUEST FOR INFORMATION TO
AEP TEXAS CENTRAL COMPANY
QUESTION NOS. STAFF 3-1 THROUGH STAFF 3-2**

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.

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- STAFF 3-1** Please refer to "WP Schedule C (2013 Costs)" of the Company's application; for the incentive costs shown, for each rate class, please provide a breakdown between incentive costs that were directly spent on energy efficiency measures for that class, and those incentive costs that were allocated to that rate class.
- STAFF 3-2** For 2013 incentive costs that were allocated to rate classes, please provide the justification for allocating instead of directly assigning those costs. Please provide workpapers showing the derivation of any allocation factors used.