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

**CITIES SERVED BY AEP TEXAS NORTH COMPANY'S  
FIRST REQUEST FOR INFORMATION  
TO AEP TNC**

Cities Served by AEP Texas North Company ("Cities") files this first request for information ("RFI") to AEP Texas North Company ("AEP TNC" or "Company") in the above-styled docket. AEP TNC is hereby requested to furnish one copy of all items of information enumerated on the attached sheets directly to the undersigned attorney at the offices of Lloyd Gosselink Rochelle & Townsend, P.C., 816 Congress Avenue, Suite 1900, Austin, Texas 78701, (512) 322-5800 within ten (10) calendar days. These requests shall be deemed continuing so as to require further and supplemental responses if AEP TNC receives or generates additional information within the scope of these requests between the time of the original response and the time of the hearing. Also, where data is requested, provide it in hard copy and Excel format with all formulas intact.

**DEFINITIONS AND INSTRUCTIONS**

A. 'AEP Texas North Company' or 'AEP TNC' refers to its parents, affiliates and subsidiaries, and any person acting or purporting to act on its behalf, including without limitation, attorneys, agents, advisors, investigators, representatives, employees or other persons.

B. The term 'document' shall have the broadest meaning possible under the Texas Rules of Civil Procedure and shall include, but not be limited to, the original (or a copy when the original is not available), each non-identical copy (including those which are non-identical by reason of notations or marking, or by appearing in the files of a separate person), and any books, notebooks, pamphlets, periodicals, letters, reports, memoranda, handwritten notes, notations, messages, telegrams, wires, cables, press or news wire releases, records, studies, analyses, summaries, magazines, booklets, circulars, catalogs, bulletins, instructions, operating or

maintenance manuals, operating or product specifications, fabrication sheets, test data, design specifications, parts lists, calendars, day-timers, notes or records of meetings, notices, purchase orders, bills, ledgers, checks, tabulations, questionnaires, surveys, drawings, sketches, schematics, blueprints, flow sheets, working papers, charts, graphs, indices, tapes, agreements, releases, appraisals, valuations, estimates, opinions, financial statements, accounting records, income statements, photographs, films or videotapes, back-up tapes, minutes, contracts, leases, invoices, records of purchase or sale, correspondence, electronic or other transcription or tapings of or notes pertaining to telephone or personal conversations or conferences, tape recordings, electromagnetic recordings, voice mail message or transcriptions thereof, interoffice communications of all types, e-mail messages, printouts of e-mail messages, instant messages or printouts thereof, microfilms, electronic databases, CDs, DVDs, videotapes or cassettes, films, movies, computer printouts and any and all other written, printed, typed, punched, engraved, taped, filmed, recorded (electronically or otherwise), labeled, or graphic matter, of whatever description, however produced or reproduced (including computer-stored or generated data, together with instructions or programs necessary to search and retrieve such data), and shall include all attachments to (including tangible things) and enclosures with (including tangible things) any requested item, to which they are attached or with which they are enclosed, and each draft thereof. A draft of a non-identical copy is a separate document within the meaning of this term. An electronic copy of a paper documents is a separate document within the meaning of this term.

C. Pursuant to Rule 196.4 of the Texas Rules of Civil Procedure, Cities specifically requests that any electronic or magnetic data (which is included in the definition of 'document') that is responsive to a request herein be produced on CD-Rom in a format that is compatible with Microsoft Office and/or Word Perfect and be produced with your response to these requests. Cities further request that AEP TNC produce electronic copies of all paper documents, including any metadata attached to such documents, and produce all electronic originals or all responsive documents.

D. The terms 'and' and 'or' shall be construed both disjunctively and conjunctively as necessary to make the request inclusive rather than exclusive.

E. 'Each' shall be construed to include the word 'every' and 'every' shall be construed to include the word 'each.'

F. 'Any' shall be construed to include 'all' and 'all' shall be construed to include 'any.'

G. The term 'concerning,' or one of its inflections, includes the following meanings: relating to; referring to; pertaining to; regarding; discussing; mentioning; containing; reflecting; evidencing; describing; showing; identifying; providing; disproving; consisting of; supporting; contradicting; in any way legally, logically or factually connected with the matter to which the term refers; or having a tendency to prove or disprove the matter to which the term refers.

H. The term 'including,' or one of its inflections, means and refers to 'including but not limited to.'

I. 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.

J. The present tense shall be construed to include the past tense, and the past tense shall be construed to include the present tense.

K. 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.

L. Pursuant to P.U.C. PROC. R. 22.144(h)(4), if the response to any request is voluminous, please provide a detailed index of the voluminous material.

M. If the information requested is included in previously furnished exhibits, workpapers, responses to other discovery inquiries or otherwise, in hard copy or electronic format, please furnish specific references thereto, including Bates Stamp page citations and detailed cross references.

Respectfully submitted,

**LLOYD GOSSELINK ROCHELLE  
& TOWNSEND, P.C.**

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ATTORNEYS FOR CITIES SERVED BY AEP  
TEXAS NORTH 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 16th day of June, 2014, to the parties of record.



EILEEN MCPHEE KEIFFER

**CITIES' FIRST RFI TO  
AEP TNC**

- Cities 1-1. For the programs and expenditures listed in Schedule A, provide a complete list of all measures included within each program (e.g. all measures within the A/C Distributor Pilot MTP). For each measure please provide the projected incentive and related demand and energy savings (e.g. kW and kWh) amounts for 2015. Provide all data in a Microsoft Excel format with all formulas and cell references intact, including any calculations and supporting workpapers
- Cities 1-2. For each of the service providers listed in Schedule J (Confidential), provide a complete and detailed breakdown of the actual incentive costs paid to each provider by measure including: customer participation in each measure offered, incentive level(s) and savings (kW and kWh) for each measure. Provide the amount of energy and demand savings attributed to each provider and total compensation for each contract detailing fixed fee, at risk and "stretch" savings payments. Provide all data in a Microsoft Excel format with all formulas and cell references intact, including any calculations and supporting workpapers.