



Control Number: 42509



Item Number: 7

Addendum StartPage: 0

SOAH DOCKET NO. 473-14-3895  
PUC DOCKET NO. 42509

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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

COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION TO  
AEP TEXAS NORTH COMPANY  
QUESTION NOS. STAFF 1-1 THROUGH STAFF 1-4

Pursuant to §22.144 of the Commission's Procedural Rules, the Staff of the Public Utility Commission of Texas (Staff) requests that AEP Texas North Company (TNC 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.

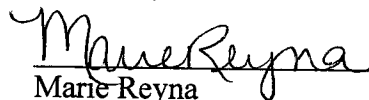
Provide an original and three copies of your answers to the questions to the Filing Clerk, Public Utility Commission of Texas, 1701 N. Congress Avenue, P.O. Box 13326, Austin, Texas 78711-3326.

Dated: June 6, 2014

Respectfully Submitted,

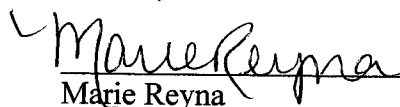
Joseph P. Younger  
Division Director-Legal Division

Shelah J. Cisneros  
Managing Attorney-Legal Division

  
Marie Reyna  
Attorney-Legal Division  
State Bar No. 24059934  
(512) 936-7255  
(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 6, 2014, in accordance with P.U.C. Procedural Rule 22.74.

  
Marie Reyna

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**COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION TO  
AEP TEXAS NORTH COMPANY  
QUESTION NOS. STAFF 1-1 THROUGH STAFF 1-4**

**DEFINITIONS**

- A. “AEP TNC”, “the Company” or “you” refers to AEP Texas North 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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QUESTION NOS. STAFF 1-1 THROUGH STAFF 1-4**

**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 1-1** Please list the 2013 sponsors/implementers that received 5% or more of the total incentives. Please provide an Excel spreadsheet that includes the items in the table below. Please describe any variance between the total contract amount and the fixed fee, at-risk compensation, and incentives.

Table 1. 2013 Sponsors Receiving 5% or More of Program Incentives

	<b>Fixed Fee</b>	<b>At-Risk Compensation</b>	<b>Total Contract</b>
<b>Sponsor</b>			
<b>Program</b>			
Residential			
Commercial			
<b>Program</b>			
Residential			
Commercial			

**STAFF 1-2** What steps does AEP TNC plan to take to ensure the Irrigation Load Management MTP program is cost-effective in future program years?

**STAFF 1-3** Are the 2013 evaluation, measurement, and verification (EM&V) expenses and AEP TNC's rate case expenses included in the calculation of the performance bonus?

**STAFF 1-4** Please describe the expenses categorized as "Other Third Party EM&V Costs" for 2013.