

Control Number: 43695



Item Number: 568

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SOAH DOCKET NO. 473-15-1556
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2015 APR 27 PM 2:45
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APPLICATION OF SOUTHWESTERN § BEFORE THE
PUBLIC SERVICE COMPANY FOR § STATE OFFICE OF
AUTHORITY TO CHANGE RATES § ADMINISTRATIVE HEARINGS

**TEXAS INDUSTRIAL ENERGY CONSUMERS'
SEVENTEENTH SET OF REQUESTS FOR INFORMATION
TO SOUTHWESTERN PUBLIC SERVICE COMPANY**

Pursuant to § 22.144 of the Commission's Procedural Rules, Texas Industrial Energy Consumers ("TIEC") requests that Southwestern Service Power Company ("SPS") provide all of the information requested in Exhibit "A" within the time frame specified under the Procedural Schedule entered in this proceeding.

Pursuant to P.U.C. Proc. R. 22.144(c)(2), TIEC further requests that answers to the requests for information be made under oath. Each answer should identify the person responsible for preparing that answer (other than the purely clerical aspects of its preparation) and the name of the witness in this proceeding who will sponsor the answer and who can vouch for its accuracy. In producing documents pursuant to this request for information, please indicate the specific request(s) to which the document is being produced. These requests are continuing in nature, and should there be, for any reason, a change in circumstances which would modify or change an answer supplied by you, such changed answer should be submitted immediately as a supplement to your original answer pursuant to P.U.C. Proc. R. 22.144(i). Please answer each request and sub-request in the order in which they are listed and in sufficient detail to provide a complete and accurate answer to the request. TIEC further requests that each item of information be made available as it is completed, rather than upon compilation of all information requested.

All information responsive to the requests on the attached Exhibit "A" should be sent to the following persons via overnight courier, on a piecemeal basis as individual items become available:

Mr. Rex D. VanMiddlesworth
Mr. Benjamin Hallmark
Ms. Jill R. Carvalho
Thompson & Knight LLP
98 San Jacinto Boulevard, Ste. 1900
Austin, Texas 78701
(512) 469-6100 Telephone
(512) 469-6180 Facsimile
rex.vanm@tklaw.com
benjamin.hallmark@tklaw.com
jill.carvalho@tklaw.com

DEFINITIONS AND INSTRUCTIONS

- A. "SPS," "the Company" or "you" refers to Southwestern Service Power Company, and its affiliates, subsidiaries, and any person acting or purporting to act on their behalf, including without limitation, attorneys, agents, advisors, investigators, representatives, employees or other persons.
- B. "Applicant" refers to Southwestern Service Power Company, and their affiliates, subsidiaries, and any person acting or purporting to act on their behalf, as it relates to the true-up proceeding and related appeals, including without limitation, attorneys, agents, advisors, investigators, representatives, employees or other persons.
- C. The terms "document" or "documents" are used in their broadest sense to include, by way of illustration and not limitation, all written or graphic matter of every kind and description whether printed, produced, reproduced or stored by any process whether visually, magnetically, mechanically, electronically or by hand, whether final or draft, original or reproduction, whether or not claimed to be privileged or otherwise excludable from discovery, and whether or not in your actual or constructive possession, custody, or control. The terms include writings, correspondence, telegrams, memoranda, studies, reports, surveys, statistical compilations, notes, calendars, tapes, computer disks, data on computer drives, e-mail, cards, recordings, contracts, agreements, invoices, licenses, diaries, journals, accounts, pamphlets, books, ledgers, publications, microfilm, microfiche and any other data compilations from which information can be obtained and translated, by you if necessary, into reasonably usable form. The definition includes electronic information that has been deleted. "Document" or "documents" shall also include every copy of a document where the copy contains any commentary or notation of any kind that does not appear on the original or any other copy.
- D. Pursuant to Rule 196.4 of the Texas Rules of Civil Procedure, TIEC specifically requests that any electronic or magnetic information (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 Adobe Acrobat, Microsoft, Macintosh and/or Word Perfect and be produced with your response to these requests. If emails are responsive to these requests, please provide a searchable .pdf copy of the entire email string. Attachments to emails should be provided with

the email in searchable .pdf form, unless it is stored in a different format, in which the attachment should be produced in its native format and provided on CD-Rom.

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

F. “Each” shall be construed to include the word “every” and “every” shall be construed to include the word “each.”

G. “Any” shall be construed to include “all” and “all” shall be construed to include “any.”

H. 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.

I. The term “including,” or one of its inflections, means and refers to “including but not limited to.”

J. 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.

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

L. 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 of copies, subject matter of the document, and the basis upon which such privilege is claimed.

M. 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.

N. If the information requested is included in previously furnished exhibits, workpapers, and 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.

O. The term “emails” includes the entire email string and all attachments found anywhere within the email string. Please refer to paragraph “D.” regarding specific instructions for producing such items.

P. “Communications” refers to correspondence of any kind, including emails.

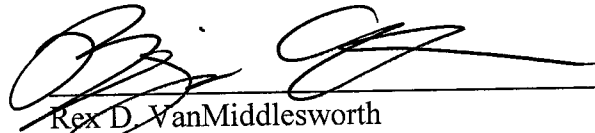
Q. "Identify" and "describe" shall have the meaning set forth below according to the context in which the term is used:

- i. When used in reference to an individual, shall mean to state his or her full name, business affiliation, job title, and business address and telephone number;
- ii. When used in reference to a corporation, shall mean to state its full name, its state of incorporation, its address and its principal place of business;
- iii. When used in reference to any entity other than an individual or corporation, shall mean to state its official name, its organizational form and its address;
- iv. When used in reference to a document, shall mean to state the type of document, date, author, addressee, title, its present location, the name and address of its custodian, and the substance of the contents thereof. In lieu of identifying any document, copies thereof may be furnished; and
- v. When used in reference to a communication, shall mean to state the form of the communication (e.g., telephone conversation, letter, telegram, teletype, telecopy, written memorandum, face to face conversation, or any other form), the date of the communication or the dates on which the communication was sent and/or received if not the same, the parties to the communication, the party who initiated it, the substance of the communication, and the present location and the name and address of the custodian if the communication was non-verbal and/or of any written memorialization of the communication.

R. "MAC" refers to Management Applications Consulting, Inc., the consulting firm that performed SPS's cost-of-service study. "MAC model" refers to the software (including the Visual Basic code) that MAC uses to develop cost-of-service studies for regulated utilities, not only the particular model developed for SPS in this rate case.

Respectfully submitted,

THOMPSON & KNIGHT LLP



Rex D. VanMiddlesworth

State Bar No. 20449400

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State Bar No. 24069865

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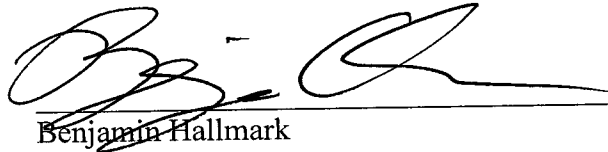
(512) 469.6100

(512) 469.6180 (fax)

ATTORNEYS FOR TEXAS INDUSTRIAL
ENERGY CONSUMERS

CERTIFICATE OF SERVICE

I, Benjamin Hallmark, Attorney for TIEC, hereby certify that a copy of the foregoing document was served on all parties of record in this proceeding on this 27th day of April, 2015 by facsimile, electronic mail and/or First Class, U.S. Mail, Postage Prepaid.



Benjamin Hallmark

Exhibit A

**SOAH DOCKET NO. 473-15-1556
PUC DOCKET NO. 43695**

**APPLICATION OF SOUTHWESTERN § PUBLIC UTILITY COMMISSION
PUBLIC SERVICE COMPANY FOR §
AUTHORITY TO CHANGE RATES § OF TEXAS**

**TEXAS INDUSTRIAL ENERGY CONSUMERS'
SEVENTEENTH SET OF REQUESTS FOR INFORMATION TO
SOUTHWESTERN PUBLIC SERVICE COMPANY**

- TIEC 17-1 Referring to SPS's response to TIEC 13-3,
- a. please confirm that the reason that "there are no such specifications for the time period requested" is that TLG has not prepared any specifications for dismantling a power plant during the last ten years.
 - b. If TLG has prepared such specifications during that time, please identify the plant at issue, the type of plant, and the date TLG prepared the specifications and provide an explanation as to why the specifications are not available.
- TIEC 17-2 Has Mr. Seymore ever prepared specifications for the dismantling of a fossil-fuel power plant? If so, please list each instance, including in your response the plant at issue and the date the specifications were completed.
- TIEC 17-3 Please provide a copy of all specifications identified in response to TIEC 17-2 that were prepared in the last 20 years.
- TIEC 17-4 Has Mr. Seymore ever prepared specifications for the dismantling of a non-fossil fuel power plant? If so, please list each instance, including in your response the plant at issue and the date the specifications were completed.
- TIEC 17-5 Please provide a copy of all specifications identified in response to TIEC 17-4 that were prepared in the last 20 years.
- TIEC 17-6 Has Mr. Seymore or TLG ever prepared a bid for the complete dismantling of a power plant?
- TIEC 17-7 To the extent your answer to TIEC 17-6 is "yes,"
- a. Please identify the plant that was the subject of the bid, including specifying the type of plant, and identify the date the bid was submitted.
 - b. For each bid identified in response to subpart (a) of this RFI, please provide a copy of the bid if the bid was submitted in the last ten years.

- c. For each bid identified in response to subpart (a) of this RFI, please explain whether TLG won the bid and actually performed the dismantling.
- d. For each bid identified in response to subpart (a) of this RFI, please explain Mr. Seymore's role in preparing the bid, if any.