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SQAH DOCKET NO. 473-17-1764 **PUC DOCKET NO. 46449**

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APPLICATION SOUTHWESTERN **ELECTRIC POWER COMPANY FOR AUTHORITY TO CHANGE RATES**

BEFORE THE STATE

OF

88888 **ADMINISTRATIVE HEARINGS**

OFFICE OF PUBLIC UTILITY COUNSEL'S FIFTH REQUEST FOR INFORMATION TO SOUTHWESTERN ELECTRIC POWER COMPANY

The Office of Public Utility Counsel (OPUC) propounds this Fifth Request for Information (RFI) to Southwestern Electric Power Company (SWEPCO). Under P.U.C. Procedural Rules 22.141-145, OPUC requests that SWEPCO, as defined herein, provide the following information and answer the following questions under oath. Please answer the questions and sub-questions in the order in which they are listed and in sufficient detail to provide a complete and accurate answer to the question.

Definitions

As used in this introduction and in these questions,

- "SWEPCO", the "Company", and "Applicant" refer to Southwestern Electric (1) Power Company and its affiliates;
- (2) "You", "yours" and "your" refer to SWEPCO (as defined above), including its directors, officers, employees, consultants; agents, and attorneys.
- (3)"Document" and "documents" mean any written, recorded, filmed, or graphic matter, whether produced, reproduced, or on paper, cards, tapes, film, electronic facsimile, computer storage device or any other media, including, but not limited to, electronic mail (e-

mail), memoranda, notes, analyses, minutes, records, photographs, correspondence, telegrams, diaries, bookkeeping entries, financial statements, tax returns, checks, check stubs, reports, studies, charts, graphs, statements, notebooks, handwritten notes, applications, contracts, agreements, books, pamphlets, periodicals, appointment calendars, records and recordings of oral conversations, work papers, observations, commercial practice manuals, reports and summaries of interviews, reports, of consultants, appraisals, forecasts, tape recordings, or any form of recording that is capable of being transcribed into written form.

Instructions

- 1. The Definitions, Instructions, and Claim of Privilege set out in this Request for Information apply to these questions.
- 2. In answering these questions, furnish all information that is available to you, including information in the possession of your agents, employees, and representatives, all others from whom you may freely obtain it, and your attorneys and their investigators.
- 3. Please answer each question based upon your knowledge, information, or belief, and any answer that is based upon information or belief should state that it is given on that basis.
- 4. If you have possession, custody, or control (as defined by Tex. R. Civ. P. 192.7(b)) of the originals of these documents requested, please produce the originals or a complete copy of the originals and all copies that are different in any way from the original, whether by interlineation, receipt stamp, or notation.
- 5. If you do not have possession, custody, or control of the originals of the documents requested, please produce copies of the documents, however made, in your possession, custody, or control. If any document requested is not in your possession or subject to your

- control, please explain why not, and give the present location and custodian of any copy or summary of the document.
- 6. If any question appears confusing, please request clarification from the undersigned counsel.
- 7. In providing your responses, please start each response on a separate page and type, at the top of the page, the question that is being answered.
- 8. As part of the response to each question, please state, at the bottom of the answer, the name and job position of each person who participated in any way, other than providing clerical assistance, in the preparing of the answer. If the question has sub-parts, please identify the person or persons by sub-part. Please also state the name of the witness in this docket who will sponsor the answer to the question and who can vouch for the truth of the answer. If the question has sub-parts, please identify the witness or witnesses by sub-part.
- 9. Rather than waiting to provide all of the responses at the same time, please provide individual responses as each becomes available.
- 10. These questions are continuing in nature. If there is a change in circumstances or facts or if you receive or generate additional information that changes your answer between the time of your original response and the time of the hearings, then you should submit, under oath, a supplemental response to your earlier answer.
- 11. If you consider any question to be unduly burdensome, or if the response would require the production of a voluminous amount of material, please call the undersigned counsel as soon as possible in order to discuss the situation and to try to resolve the problem. Likewise, if you object to any of the questions on the grounds that the question seeks

- confidential information, or on any other grounds, please call the undersigned counsel as soon as possible.
- 12. If the response to any question is voluminous, please provide separately an index to the materials contained in the response.
- 13. If the information requested is included in previously furnished exhibits, workpapers, or 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.
- 14. Data should be provided in native electronic format including active EXCEL workbooks and all linked workbooks, with all formulas, cell references, links, etc., intact, functioning, and complete for all tables, figures, and attachments in the testimony.
- 15. To the extent that a question asks for the production of copyrighted material, it is sufficient to provide a listing of such material, indicating the title, publisher, author, edition, and page references relied on or otherwise relevant to the question.

Claim of Privilege

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

Respectfully submitted,

Tonya Baer Public Counsel State Bar No. 24026771

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CERTIFICATE OF SERVICE

SOAH Docket No. 473-17-1764 PUC Docket No. 46449

I certify that today, February 24, 2017, a true copy of the Office of Public Utility Counsel's Fifth Request for Information to Southwestern Electric Power Company was served on all parties of record via United States First-Class Mail, hand-delivery or facsimile.

Cassandra Quinn

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OPUC's Fifth Request For Information To Southwestern Electric Power Company

- 5-1. Please provide hourly residential and small general service loads (unadjusted) in the Test Year.
- 5-2. Please provide available information on hourly solar production in the Test Year.
- 5-3. Please provide hourly customer loads (positive or negative) for all individual residential and small general service customers with solar production in the test year for whom SWEPCO has hourly loads.
- **5-4.** Please provide SPP market prices in the test year for a representative Texas SWEPCO node or nodes.
- 5-5. Please provide the absolute value of positive loads of solar customers and amounts provided to the utility in each hour in the test year.
- 5-6. Please provide the cost basis for the administrative charge of \$8 per month for net metering.
- 5-7. Please provide any documents prepared by SWEPCO for presentation to the Net Metering Working Group in Arkansas, which was established under Docket No. 16-027-R.
- 5-8. Please provide any materials in SWEPCO's possession prepared by the Net Metering Working Group in Arkansas regarding the group's work plan and meeting agendas.
- 5-9. Admit or Deny that SWEPCO is (or has been) a participant in the Net Metering Working Group in Arkansas referenced in RFI Nos. 5-7 and 5-8, above.