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SOAH DOCKET NO. 473-17-1764
PUC DOCKET NO. 46449

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PUBLIC UTILITY COMMISSION
OF TEXAS

APPLICATION OF SOUTHWESTERN §
ELECTRIC POWER COMPANY FOR §
AUTHORITY TO CHANGE RATES §

BEFORE THE
PUBLIC UTILITY COMMISSION
OF TEXAS

TEXAS INDUSTRIAL ENERGY CONSUMERS' SUPPLEMENTAL RESPONSE TO
SOUTHWESTERN ELECTRIC POWER COMPANY'S
SECOND REQUEST FOR INFORMATION

Texas Industrial Energy Consumers ("TIEC") files the following supplemental response to the Second Requests for Information ("RFI") to TIEC filed by Southwestern Electric Power Company ("SWEPCO"). The request was filed at the Commission and received by TIEC on May 4, 2017. Pursuant to an agreement with SWEPCO, TIEC's response is timely filed. TIEC's responses to specific questions are set forth as follows, in the order of the questions asked. Pursuant to P.U.C. Proc. R. 22.144(c)(2)(F), these responses may be treated as if they were filed under oath.

Respectfully submitted,

THOMPSON & KNIGHT LLP

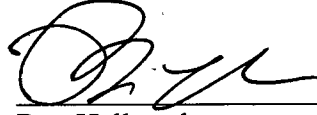


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ATTORNEYS FOR TEXAS INDUSTRIAL
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CERTIFICATE OF SERVICE

I, Ben 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 15th day of May 2017, by electronic mail, facsimile and/or First Class, U.S. Mail, Postage Prepaid.

A handwritten signature in black ink, appearing to read 'Ben Hallmark', is written over a horizontal line.

Ben Hallmark

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2-1. For each witness presenting testimony for TIEC, to the extent not provided with his or her pre-filed testimony or workpapers already submitted in this proceeding, please provide:

- a. any testimony they have previously presented addressing relating to ratemaking treatment of a retired power plant;
- b. any testimony they have previously presented addressing relating to the prudence of retiring a power plant; and
- c. any testimony they have previously presented addressing, or relating to the installation of environmental controls at a power plant.

RESPONSE:

a-c. SWEPCO has agreed to limit this RFI to responsive testimonies submitted within the past seven years. Pursuant to an agreement with SWEPCO, TIEC provides this original response with respect to testimonies submitted within the past five years, and will file a supplemental response addressing any additional responsive testimonies within the past seven years.

Mr. Pollock is not aware of any testimony he submitted in the last five years on the ratemaking treatment of retiring a power plant or relating to the installation of environmental controls at a power plant. Mr. Pollock did submit testimony on the prudence and reasonableness of a utility's decision to buy-out a purchased power agreement by acquiring and then subsequently retiring the corresponding asset in Docket No. 150075 before the Florida Public Service Commission. A copy of this testimony can be obtained from the Florida commission website at www.psc.state.fl.us.

For Mr. Gorman, please see the direct testimony he submitted in Docket 44688 before the Indiana Utility Regulatory Commission, a copy of which can be obtained at <https://iurc.portal.in.gov/search/legalcase/>.

SUPPLEMENTAL RESPONSE:

Other than what was identified in TIEC's original response, neither Mr. Gorman nor Mr. Pollock is aware of any additional responsive testimonies submitted with the past seven years.

Preparer: Michael Gorman; Jeffry Pollock