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SOAH DOCKET NO. 473-17-5481
PUC DOCKET NO. 47461

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APPLICATION OF SOUTHWESTERN
ELECTRIC POWER COMPANY FOR
CERTIFICATE OF CONVENIENCE AND
NECESSITY AUTHORIZATION AND
RELATED RELIEF FOR THE WIND
CATCHER ENERGY CONNECTION
PROJECT IN OKLAHOMA

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BEFORE THE STATE OFFICE
PUBLIC UTILITY BOARD
FILING CLERK

OF

ADMINISTRATIVE HEARINGS

CITIES ADVOCATING REASONABLE DEREGULATION'S
RESPONSES TO SOUTHWESTERN ELECTRIC POWER COMPANY'S
FIRST REQUEST FOR INFORMATION TO THE
CITIES ADVOCATING REASONABLE DEREGULATION, QUESTION NO. 1-1

Cities Advocating Reasonable Deregulation ("CARD") hereby files its responses to Southwestern Electric Power Company's ("SWEPCO") First Set of Requests for Information ("RFIs") to CARD.

I. Written Responses.

CARD's written responses to SWEPCO's First Set of RFIs are attached and incorporated by reference. Each response is stated on or attached to a separate page on which the request has been restated. CARD's responses are made in the spirit of cooperation without waiving CARD's right to contest the admissibility of any of these matters at hearing. Pursuant to 16 Tex. Admin. Code § 22.144(c)(2)(A), each response lists the preparer or person under whose direct supervision the response was prepared and any sponsoring witness. When CARD provides certain information sought by the request while objecting to the provision of information, they do so without prejudice to their objection in the interests of narrowing discovery disputes pursuant to 16 Tex. Admin. Code § 22.144(d)(5). Pursuant to 16 Tex. Admin. Code § 22.144(c)(2)(F), CARD stipulates that their responses may be treated by all parties as if they were made under oath.

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II. Inspections.

If responsive documents are more than 100 pages but less than eight linear feet in length, the response will indicate that the attachment is VOLUMINOUS and, pursuant to 16 Tex. Admin. Code § 22.144(h)(2), the attachment will be made available for inspection at the offices of Herrera Law & Associates, PLLC, 816 Congress, Suite 950, Austin, Texas, 78701. If a response or the responsive documents are provided pursuant to the protective order in this docket, the response will indicate that it or the attachment is either CONFIDENTIAL or HIGHLY SENSITIVE as appropriate under the protective order. Highly sensitive responses will be made available for inspection at the offices of Herrera Law & Associates, PLLC, 816 Congress, Suite 950, Austin, Texas, 78701, unless they form a part of a response that exceeds eight linear feet in length; then they will be available at their usual repository in accordance with the following paragraph. Please call in advance for an appointment to ensure that there is sufficient space to accommodate your inspection.

If responsive documents exceed eight linear feet in length, the response will indicate that the attachment is subject to the FREIGHT CAR DOCTRINE, and, pursuant to Commission 16 Tex. Admin. Code § 22.144(h)(3), the attachment will be available for inspection at the offices of Herrera Law & Associates, PLLC, 816 Congress, Suite 950, Austin, Texas, 78701, unless otherwise indicated. CARD requests that parties wishing to inspect this material provide at least 48 hours' notice of their intent by contacting the offices of Herrera Law & Associates, PLLC, 816 Congress, Suite 950, Austin, Texas, 78701; telephone number (512) 474-1492; fax number (512) 474-2507. Inspections will be scheduled to accommodate all requests with as little inconvenience to the requesting party and CARD's operations as possible.

Respectfully submitted,

HERRERA LAW & ASSOCIATES, PLLC

816 Congress Avenue, Suite 950

Austin, Texas 78701

(512) 474-1492

(512) 474-2507 FAX

By: _____

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**ATTORNEYS FOR CITIES
ADVOCATING REASONABLE
DEREGULATION**

CERTIFICATE OF SERVICE

I certify that I have served a copy of *CARD's Responses to SWEPCO's First Set of Requests for Information to CARD* upon all known parties of record by fax and/or first class mail on this the 12th day of December 2017.

Brennan J. Foley

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APPLICATION OF SOUTHWESTERN ELECTRIC POWER COMPANY FOR CERTIFICATE OF CONVENIENCE AND NECESSITY AUTHORIZATION AND RELATED RELIEF FOR THE WIND CATCHER ENERGY CONNECTION PROJECT IN OKLAHOMA	§ § § § § § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
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**CITIES ADVOCATING REASONABLE DEREGULATION'S
RESPONSES TO SOUTHWESTERN ELECTRIC POWER COMPANY'S
FIRST REQUEST FOR INFORMATION TO THE
CITIES ADVOCATING REASONABLE DEREGULATION, QUESTION NO. 1-1**

SWEPCO 1-1:

Please provide a copy of all workpapers supporting or underlying Mr. Norwood's testimony and exhibits in native electronic format with all cells and formulae intact.

RESPONSE:

The requested documents were provided with Mr. Norwood's direct testimony on December 4, 2017.

**Sponsored by: Scott Norwood
Prepared by: Scott Norwood**