



Control Number: 49494



Item Number: 279

Addendum StartPage: 0

**SOAH DOCKET NO. 473-19-4421**  
**PUC DOCKET NO. 49494**

FILED

**APPLICATION OF AEP TEXAS INC.** § **BEFORE THE**  
**FOR AUTHORITY TO CHANGE RATES** § **STATE OFFICE OF**  
§ **ADMINISTRATIVE HEARINGS**

**STATEMENT UNDER SECTION 4 OF PROTECTIVE ORDER**

Certain documents provided in response to Office of Public Utility Counsel's First Request for Information to AEP Texas Inc. (AEP Texas), Question Nos. 1-5, 1-6, 1-7, 1-9, 1-10, 1-11, and 1-20 are exempt from public disclosure pursuant to Sections 552.101, 552.102, 552.104, and 552.110 of the Public Information Act<sup>1</sup> and are subject to treatment as Highly Sensitive protected materials. The materials provided in response to OPUC's RFI Nos. 1-5, 1-6, 1-7, 1-9, 1-10, 1-11, and 1-20 consist of confidential personnel, employment, salary and compensation-related information, that if released, would provide an advantage to a competitor or bidder and could cause substantial competitive harm to AEP Texas.

Counsel for AEP Texas has reviewed the documents sufficiently to state in good faith that the documents are exempt from disclosure under the Public Information Act and merit the Highly Sensitive materials designation given to them.

Respectfully submitted,

Rhonda Colbert Ryan  
[rcryan@aep.com](mailto:rcryan@aep.com)  
State Bar No. 17478800  
Jerry N. Huerta  
[jnhuerta@aep.com](mailto:jnhuerta@aep.com)  
State Bar No. 24004709  
Melissa A. Gage  
[magage@aep.com](mailto:magage@aep.com)  
State Bar No. 24063949  
**AMERICAN ELECTRIC POWER SERVICE  
CORPORATION**

---

<sup>1</sup> Tex. Gov. Code Ann. § 552.001-.353 (West 2012 & Supp. 2018).

279


John F. Williams  
[jwilliams@dwmrlaw.com](mailto:jwilliams@dwmrlaw.com)  
State Bar No. 21554100  
William Coe  
[wcoe@dwmrlaw.com](mailto:wcoe@dwmrlaw.com)  
State Bar No. 00790477  
Patrick J. Pearsall  
[ppearsall@dwmrlaw.com](mailto:ppearsall@dwmrlaw.com)  
State Bar No. 24047492  
**DUGGINS WREN MANN & ROMERO, LLP**

By: 

**ATTORNEYS FOR AEP TEXAS INC.**

**CERTIFICATE OF SERVICE**

I certify that a true and correct copy of this document was served via electronic mail, facsimile, hand-delivery, overnight delivery, or First Class U.S. mail on all parties of record in this proceeding on July 17, 2019.

  
Patrick J. Pearsall