



Control Number: 49494



Item Number: 381

Addendum StartPage: 0

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

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

RECEIVED
2019 AUG -6 PM 2:22
PUBLIC UTILITY COMMISSION
FILING CLERK

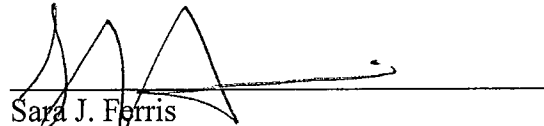
**OFFICE OF PUBLIC UTILITY COUNSEL'S RESPONSE TO
TEXAS INDUSTRIAL ENERGY CONSUMERS'
SECOND REQUEST FOR INFORMATION**

The Office of Public Utility Counsel ("OPUC") submits this response to Texas Industrial Energy Consumers' ("TIEC") Second Request for Information that was received on August 1, 2019. Pursuant to State Office of Administrative Hearings ("SOAH") Order No. 2, OPUC's response is timely filed within three working days of receipt of TIEC's discovery request. OPUC stipulates that all parties may treat this response as if it were filed under oath.

Dated: August 6, 2019

Respectfully submitted,

Lori Cobos
Chief Executive & Public Counsel
State Bar No. 24042276



Sara J. Ferris
Senior Assistant Public Counsel
State Bar No. 50511915

OFFICE OF PUBLIC UTILITY COUNSEL
1701 N. Congress Avenue, Suite 9-180
P.O. Box 12397
Austin, Texas 78711-2397
512-936-7500 (Telephone)
512-936-7525 (Facsimile)
sara.ferris@opuc.texas.gov
opuc_eservice@opuc.texas.gov (Service)

381

SOAH DOCKET 473-19-4421
PUC DOCKET NO. 49494
OPUC's Response to Texas Industrial Energy Consumers'
Second Request for Information

The following RFIs are directed to William Perea Marcus.

- 2-1. Referring to the response to TIEC 1-1(b):
- a. What specific activities were performed by the large customer account staff for the benefit of new customers?
 - b. Provide a breakdown of the new customers by customer class.

RESPONSE:

Please see AEP Texas's Response to OPUC RFI No. 4-9. Costs related to new customers were capitalized by the Company and not subject to the adjustment made by OPUC Witness Mr. Marcus.

Prepared By: William Marcus
Sponsored By: William Marcus

SOAH DOCKET 473-19-4421
PUC DOCKET NO. 49494
OPUC's Response to Texas Industrial Energy Consumers'
Second Request for Information

- 2-2. Referring to the response to TIEC 1-4, can large customers served by Major Account Representatives include customers with multiple accounts in different customer classes, including Lighting? Please explain your response and provide supporting documentation.

RESPONSE:

Large customers served by Major Account Representatives do not include either of the two Lighting rate classes. AEP Texas's Response to Cities RFI No. 2-16(c) limits the customers served by major account representatives to "commercial and industrial customers that are billed under the Secondary, Primary, and Transmission service rate classes." Customers billed under Lighting rate classes are not included in this list.

Prepared By: William Marcus
Sponsored By: William Marcus

SOAH DOCKET 473-19-4421
PUC DOCKET NO. 49494
OPUC's Response to Texas Industrial Energy Consumers'
Second Request for Information

- 2-3. Referring to the response to TIEC 1-5(b), has Mr. Marcus determined that no Secondary > 10 kW customers have accounts in other customer classes, such as Secondary < 10 kW and Lighting? If so, please provide a copy of Mr. Marcus's analysis.

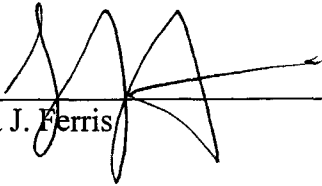
RESPONSE:

Please see AEP Texas's Response to OPUC RFI No. 4-9, AEP Texas's Response to Cities RFI No. 2-16 (c). Please also see AEP Texas's Response to OPUC RFI No. 16-3 (pending). Whether or not any large customers also have an account in a smaller customer rate class or subclass such as Secondary < 10 kW, it does not impact the basis for the provision of these major account representatives services, which requires that the customer be a large commercial or industrial customer.

Prepared By: William Marcus
Sponsored By: William Marcus

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing document was served on all parties of record in this proceeding on this 6th day of August 2019, by facsimile, electronic mail, and/or first class, U.S. Mail.


Sara J. Ferris