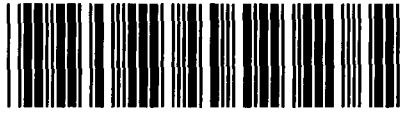


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APPLICATION OF AEP TEXAS INC.
FOR AUTHORITY TO CHANGE
RATES

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BEFORE THE STATE OFFICE
OF
ADMINISTRATIVE HEARINGS

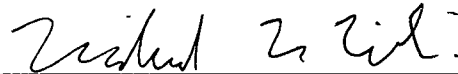
STATE OFFICE OF PUBLIC UTILITY COUNSEL
FILING CLERK

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

Texas Industrial Energy Consumers ("TIEC") files the following Response to the First Request for Information ("RFI") to TIEC filed by the Office of Public Utility Counsel ("OPUC"). The request was filed at the Commission on August 8, 2019. Accordingly, pursuant to the procedural schedule entered in this case, TIEC's response is timely filed. TIEC's response to specific questions are set forth as follows, in the order of the questions asked. Pursuant to 16 T.A.C. § 22.144(c)(2)(F), these responses may be treated as if they were filed under oath.

Respectfully submitted,

THOMPSON & KNIGHT LLP

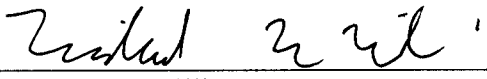


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**ATTORNEYS FOR TEXAS INDUSTRIAL
ENERGY CONSUMERS**

CERTIFICATE OF SERVICE

I, Michael McMillin, Attorney for TIEC, hereby certify that a copy of the foregoing document was served on all parties of record in this proceeding on this 13th day of August, 2019, by electronic mail, facsimile and/or First Class, U.S. Mail, Postage Prepaid.



Michael McMillin

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

APPLICATION OF AEP TEXAS INC. FOR AUTHORITY TO CHANGE RATES	§ § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
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**TEXAS INDUSTRIAL ENERGY CONSUMERS'
RESPONSE TO OPUC'S FIRST REQUEST FOR INFORMATION**

OPUC 1-1. [Please reference TIEC Witness Jeffry Pollock's recommendation regarding creating a Primary Substation Class and Exhibit JP-9's distribution revenue allocation.] Please provide TIEC's distribution revenue allocation to customer classes equivalent to that shown on Exhibit JP-9, using all of TIEC's assumptions except for the adoption of a Primary Substation Class.

RESPONSE:

Mr. Pollock has not performed the requested analysis. Accordingly, TIEC does not have the requested information in its possession, custody, or control.

Preparer: Counsel
Sponsor: Jeffry Pollock