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SOAH DOCKET NO. 473-19-6862  
PUC DOCKET NO. 49737

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APPLICATION OF SOUTHWESTERN § BEFORE THE STATE OFFICE  
ELECTRIC POWER COMPANY FOR §  
CERTIFICATE OF CONVENIENCE §  
AND NECESSITY AUTHORIZATION § OF  
AND RELATED RELIEF FOR THE §  
ACQUISITION OF WIND §  
GENERATION FACILITIES § ADMINISTRATIVE HEARINGS

**TEXAS INDUSTRIAL ENERGY CONSUMERS'**  
**FIFTH REQUEST FOR INFORMATION TO SWEPCO**

Pursuant to 16 T.A.C. § 22.144, Texas Industrial Energy Consumers (“TIEC”) requests that Southwestern Electric Power Company (“SWEPCO”) provide all of the information requested in Exhibit “A” within the time frame specified under the procedural rules.

Pursuant to 16 T.A.C. § 22.144(c)(2), TIEC further requests that answers to the requests for information be made under oath. Each answer should identify the person responsible for preparing that answer (other than the purely clerical aspects of its preparation) and the name of the witness in this proceeding who will sponsor the answer and who can vouch for its accuracy. In producing documents pursuant to this request for information, please indicate the specific request(s) to which the document is being produced. These requests are continuing in nature, and should there be, for any reason, a change in circumstances which would modify or change an answer supplied by you, such changed answer should be submitted immediately as a supplement to your original answer pursuant to 16 T.A.C. § 22.144(i). Please answer each request and sub-request in the order in which they are listed and in sufficient detail to provide a complete and accurate answer to the request. TIEC further requests that each item of information be made available as it is completed, rather than upon compilation of all information requested.

All information responsive to the requests on the attached Exhibit “A” should be sent to the following persons via overnight courier, on a piecemeal basis as individual items become available:

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Mr. Rex D. VanMiddlesworth  
Mr. Benjamin Hallmark  
Mr. James Zhu  
Thompson & Knight LLP  
98 San Jacinto Blvd., Suite 1900  
Austin, Texas 78701  
(512) 469.6100  
(512) 469-6180 Fax  
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### **DEFINITIONS AND INSTRUCTIONS**

“SWEPCO” refers to Southwestern Electric Power Company, and its affiliates, subsidiaries, and any person acting or purporting to act on their behalf, as it relates to the true-up proceeding and related appeals, including without limitation, attorneys, agents, advisors, investigators, representatives, employees or other persons.

“AEP” refers to American Electric Power, and its affiliates, subsidiaries, and any person acting or purporting to act on their behalf, including without limitation, attorneys, agents, advisors, investigators, representatives, employees or other persons.

The terms “document” or “documents” are used in their broadest sense to include, by way of illustration and not limitation, all written or graphic matter of every kind and description whether printed, produced or reproduced by any process whether visually, magnetically, mechanically, electronically or by hand, whether final or draft, original or reproduction, whether or not claimed to be privileged or otherwise excludable from discovery, and whether or not in your actual or constructive possession, custody, or control. The terms include writings, correspondence, telegrams, memoranda, studies, reports, surveys, statistical compilations, notes, calendars, tapes, computer disks, data on computer drives, e-mail, cards, recordings, contracts, agreements, invoices, licenses, diaries, journals, accounts, pamphlets, books, ledgers, publications, microfilm, microfiche and any other data compilations from which information can be obtained and translated, by you if necessary, into reasonably usable form. “Document” or “documents” shall also include every copy of a document where the copy contains any commentary or notation of any kind that does not appear on the original or any other copy.

Pursuant to Rule 196.4 of the Texas Rules of Civil Procedure, TIEC specifically requests that any electronic or magnetic data (which is included in the definition of “document”) that is responsive to a request herein be produced on CD-Rom in a format that is compatible with Microsoft, Macintosh and/or Word Perfect and be produced with your response to these requests. If emails are responsive to these requests, please provide a printed copy of the entire email string. Attachments to emails should be printed or, if the attachment is an Excel or other similar file, should be provided in native format on CD-Rom.

The terms “and” and “or” shall be construed both disjunctively and conjunctively as necessary to make the request inclusive rather than exclusive.

“Each” shall be construed to include the word “every” and “every” shall be construed to include the word “each.”

“Any” shall be construed to include “all” and “all” shall be construed to include “any.”

The term “concerning,” or one of its inflections, includes the following meanings: relating to; referring to; pertaining to; regarding; discussing; mentioning; containing; reflecting; evidencing; describing; showing; identifying; providing; disproving; consisting of; supporting; contradicting; in any way legally, logically or factually connected with the matter to which the term refers; or having a tendency to prove or disprove the matter to which the term refers.

The term “including,” or one of its inflections, means and refers to “including but not limited to.”

“Relate to,” “regarding,” “concerning” and similar terms mean addressing, analyzing, referring, discussing, mentioning in any way, explaining, supporting, describing, forming the basis for, or being logically or causally connected in any way with the subject of these discovery requests.

“Provide the basis,” “state the basis,” or “explain the basis” means provide all information on or describe every fact, statistic, inference, estimate, consideration, conclusion, study, and analysis known to SWEPCO that was relied upon in support of the expressed contention, proposition, conclusion or statement.

Words used in the plural shall also be taken to mean and include the singular. Words used in the singular shall also be taken to mean and include the plural.

The present tense shall be construed to include the past tense, and the past tense shall be construed to include the present tense.

If any document is withheld under any claim of privilege, please furnish a list identifying each document for which a privilege is claimed, together with the following information: date, sender, recipients of copies, subject matter of the document, and the basis upon which such privilege is claimed.

Pursuant to P.U.C. PROC. R. 22.144(h)(4), if the response to any request is voluminous, please provide a detailed index of the voluminous material.

If the information requested is included in previously furnished exhibits, workpapers, and responses to other discovery inquiries or otherwise, in hard copy or electronic format, please furnish specific references thereto, including Bates Stamp page citations and detailed cross-references.

The term “emails” includes the entire email string and all attachments found anywhere within the email string. Please refer to paragraph “D.” regarding specific instructions for producing such items.

“Communications” refers to correspondence of any kind, including emails.

“Identify” and “describe” shall have the meaning set forth below according to the context in which the term is used:

When used in reference to an individual, shall mean to state his or her full name, present or last known residence address, business affiliation and business address, and residence and business telephone number;

When used in reference to a corporation, shall mean to state its full name, its state of incorporation, its address and its principal place of business;


When used in reference to any entity other than an individual or corporation, shall mean to state its official name, its organizational form and its address;

When used in reference to a document, shall mean to state the type of document, date, author, addressee, title, its present location, the name and address of its custodian, and the substance of the contents thereof. In lieu of identifying any document, copies thereof may be furnished; and

When used in reference to a communication, shall mean to state the form of the communication (e.g., telephone conversation, letter, telegram, teletype, telecopy, written memorandum, face to face conversation, or any other form), the date of the communication or the dates on which the communication was sent and/or received if not the same, the parties to the communication, the party who initiated it, the substance of the communication, and the present location and the name and address of the custodian if the communication was non-verbal and/or of any written memorialization of the communication.

Respectfully submitted,

THOMPSON & KNIGHT LLP



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Rex D. VanMiddlesworth  
State Bar No. 20449400  
Benjamin B. Hallmark  
State Bar No. 24069865  
James Z. Zhu  
State Bar No. 24102683  
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Austin, Texas 78701  
(512) 469.6100  
(512) 469.6180 (fax)

ATTORNEYS FOR TEXAS INDUSTRIAL  
ENERGY CONSUMERS

**CERTIFICATE OF SERVICE**

I, James Zhu, Attorney for TIEC, hereby certify that a copy of the foregoing document was served on all parties of record in this proceeding on this 18<sup>th</sup> day of September, 2019 by facsimile, electronic mail and/or First Class, U.S. Mail, Postage Prepaid.



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James Z. Zhu

**SOAH DOCKET NO. 473-19-6862  
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<b>APPLICATION OF SOUTHWESTERN</b>	<b>§</b>	<b>BEFORE THE STATE OFFICE</b>
<b>ELECTRIC POWER COMPANY FOR</b>	<b>§</b>	
<b>CERTIFICATE OF CONVENIENCE</b>	<b>§</b>	
<b>AND NECESSITY AUTHORIZATION</b>	<b>§</b>	<b>OF</b>
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**TEXAS INDUSTRIAL ENERGY CONSUMERS’  
FIFTH REQUEST FOR INFORMATION TO SWEPCO**

**TIEC 5-1** Please provide the name of every third-party source of natural gas price forecasts to which AEP or SWEPCO subscribes or has subscribed in the last two years.

**TIEC 5-2** For each third-party source of natural gas price forecasts identified in response to TIEC 5-1, please provide:

- a. A narrative description of the manner in which AEP or SWEPCO accesses or receives natural gas forecasts.
- b. All documents from the past two years in which the third-party source transmitted a forecast to AEP or SWEPCO, or notified AEP or SWEPCO that a new forecast was available.
- c. A list of each long-term natural gas forecast (including all cases/sensitivities) by date published by the source within the last two years that AEP or SWEPCO accessed, has access to, or is otherwise within AEP’s or SWEPCO’s possession, custody, or control.
- d. A copy of every long-term natural gas forecast (including all cases/sensitivities) identified in the response to subpart (c) of this question.
- e. A list of each long-term natural gas forecast (including all cases/sensitivities) by date published by the source within the last two years that AEP or SWEPCO did not access or otherwise obtain. Please explain why AEP or SWEPCO did not access or obtain these forecasts and why AEP or SWEPCO do not have access to these forecasts presently.
- f. Please identify the long-term natural gas forecasts (including all cases/sensitivities) published by the source that were reviewed, assessed, or relied upon in connection with the creation of the Fundamentals Forecast presented by SWEPCO witness Mr. Bletzacker in this case.

**TIEC 5-3** Please provide the name of every third-party source of Southwest Power Pool (SPP) locational marginal price (LMP) forecasts and/or SPP LMP forward curves to which AEP or SWEPCO subscribes or has subscribed in the past two years.

**TIEC 5-4** For each third-party source of SPP LMP forecasts and/or SPP LMP forward curves identified in response to TIEC 5-3, please provide:

- a. A narrative description of the manner in which AEP or SWEPCO accesses or receives SPP LMP forecasts and/or forward curves.
- b. All documents from the past two years in which the third-party source transmitted a SPP LMP forecast and/or forward curve to AEP or SWEPCO, or notified AEP or SWEPCO that a new forecast and/or forward curve was available.
- c. A list of each SPP LMP forecast and/or forward curve (including all cases/sensitivities) by date published by the source within the last two years that AEP or SWEPCO accessed, has access to, or is otherwise within AEP's or SWEPCO's possession, custody, or control.
- d. A copy of every SPP LMP forecast and/or forward curve (including all cases/sensitivities) identified in the response to subpart (c) of this question.
- e. A list of each SPP LMP forecast and/or forward curve (including all cases/sensitivities) by date published by the source within the last two years that AEP or SWEPCO did not access or otherwise obtain. Please explain why AEP or SWEPCO did not access or obtain these forecasts and/or forward curves and why AEP or SWEPCO do not have access to these forecasts and/or forward curves presently.
- f. Please identify the SPP LMP forecasts and/or forward curves (including all cases/sensitivities) published by the source that were reviewed, assessed, or relied upon in connection with the creation of the Fundamentals Forecast presented by SWEPCO witness Mr. Bletzacker in this case.

**TIEC 5-5** Please provide values for each of the following assumptions used in the development of the AEP Fundamentals Forecast used by SWEPCO to evaluate the proposed wind facilities:

- a. Total U.S. and/or North America natural gas demand for each year in the study period.
- b. U.S. and/or North America natural gas demand for each year in the study period, by sector, including but not limited to:
  - i. Residential
  - ii. Industrial



- iii. Electric generation
  - iv. LNG exports
  - v. Pipeline exports
  - vi. Transportation fuel
  - vii. Other
- c. Natural gas fuel burn for each year in the study period for the U.S. and/or North America electric generation sector (both initial run and final run in AuroraXMP).
- d. Price elasticity of demand values used to calculate natural gas prices, including workpapers in native format used to determine the values.

**TIEC 5-6** Please explain how all of the values for the assumptions responsive to TIEC 5-5 were developed. Please provide any sources that were reviewed or relied upon in developing the assumptions.

**TIEC 5-7** Referring to SWEPCO's Response to TIEC 1-6, please provide the workpapers used to calculate the standard deviation that AEP used in creating the Low and High Cases presented in this case.

**TIEC 5-8** Referring to SWEPCO's Response to TIEC 2-5 and TIEC 2-6, please state whether SWEPCO conducted any quantitative analyses evaluating the additional financing costs of using a tax equity investor or joint venture structure as compared to the costs of a deferred tax asset. If so, please provide any such analyses.

**TIEC 5-9** Referring to SWEPCO's Response to TIEC 2-17, please provide the bases for SWEPCO's assumption that the additional wind facilities will be built in the SPP regardless of SWEPCO ownership.