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

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

**CITIES ADVOCATING REASONABLE DEREGULATION'S
SECOND SET OF REQUESTS FOR INFORMATION TO
SOUTHWESTERN ELECTRIC POWER COMPANY**

Cities Advocating Reasonable Deregulation's ("CARD") Second Set of Requests for Information ("RFIs") to Southwestern Electric Power Company ("SWEPCO") is hereby filed in this docket. Responses to the RFIs set forth on Exhibit A should be served on Alfred R. Herrera, Herrera Law & Associates, PLLC at 816 Congress Avenue, Suite 950, Austin, Texas 78701, within twenty (10) days of service hereof or no later than **October 3, 2019**, or as modified by Order. Exhibit A is attached hereto and incorporated herein for all purposes.

DEFINITIONS

1. "SWEPCO," the "Company," and "Applicant" refer to Southwestern Electric Power Company and its affiliates.
2. "You," "yours," and "your" refer to SWEPCO (as defined above), including its directors, officers, employees, consultants, agents and attorneys.
3. "Document" and "documents" mean any written, recorded, filmed, or graphic matter, whether produced, reproduced, or on paper, cards, tapes, film, electronic facsimile, computer storage device of any other media, including, but not limited to, memoranda, notes, analyses, minutes, records, photographs, correspondence, telegrams, diaries, bookkeeping entries, financial statements, tax returns, checks, check stubs, reports, studies, charts, graphs, statements, notebooks, handwritten notes, applications, contracts, agreements, books, pamphlets, periodicals, appointment calendars, records and recordings of oral conversations, work papers, observations, commercial practice manuals, reports and summaries of interviews, reports of consultants, appraisals, forecasts, tape recordings, or any form of recording that is capable of being transcribed into written form.
4. The term "communication" includes all verbal and written communications (including written records of verbal communications) of every kind, including but not limited to, telephone calls, conferences, letters and all memoranda or other documents concerning

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the requested item. Where communications are not in writing, provide copies of all memoranda and documents and describe in full the substance of the communication to the extent that substance is not reflected in the memoranda and documents provided and to the extent it is within the knowledge of SWEPCO.

5. "Identification" of a document includes stating (a) the nature of the document (e.g., letter, memorandum, corporate minutes), (b) the date, if any, appearing thereon, (c) the date, if known, on which the document was prepared, (d) the title of the document, (e) the general subject matter of the document, (f) the number of pages comprising the document, (g) the identity of each person who signed or initialed the document, (h) the identity of each person to whom the document was addressed, (i) the identity of each person who received the document or reviewed it, (j) the location of the document, and (k) the identity of each person having custody of, or control over, the document. Identification of a document includes identifying all documents known or believed to exist, whether or not in the custody of SWEPCO or in the custody of its attorneys or other representatives or agents.
6. "Identification" of a person includes stating his or her full name, his or her most recent known business address and telephone number, his or her present position, and his or her prior connection or association with any party to this proceeding.
7. "Person" refers to, without limiting the generality of its meaning, every natural person, corporate entity, partnership, association (whether formally organized or ad hoc), joint venture, unit operation, cooperative, municipality, commission, governmental body or agency.
8. Capitalized terms not otherwise defined herein shall have the meaning attributed to them in the referenced testimony.

INSTRUCTIONS

1. If any RFI appears confusing, please request clarification from the undersigned counsel.
2. In providing your responses, please start each response on a separate page and type, at the top of the page, the RFI that is being answered.
3. As part of the response to each RFI, please state, at the bottom of the answer, the name and job position of each person who participated in any way, other than providing clerical assistance, in the preparing of the answer. If the RFI has sub-parts, please identify the person or persons by sub-part. Please also state the name of the witness in this docket who will sponsor the answer to the RFI and who can vouch for the truth of the answer. If the RFI has sub-parts, please identify the witness or witnesses by sub-part.
4. Rather than waiting to provide all of the responses at the same time, please provide individual responses as each becomes available.
5. If SWEPCO considers any RFI to be unduly burdensome, or if the response would require the production of a voluminous amount of material, please call the undersigned

counsel as soon as possible in order to discuss the situation and to try to resolve the problem. Likewise, if SWEPCO objects to any of the RFIs on the grounds that the RFI seeks proprietary information, or on any other grounds, please call the undersigned counsel as soon as possible.

6. 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, recipients of copies, subject matter of the document, and the basis upon which such privilege is claimed.
7. These requests shall be deemed continuing so as to require further and supplemental responses if SWEPCO receives or generates additional information within the scope of these requests between the time of the original response and the time of the hearings.

Respectfully submitted,

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**ATTORNEYS FOR CITIES ADVOCATING
REASONABLE DEREGULATION**

CERTIFICATE OF SERVICE

I certify that I have served a copy of *CARD's Second Set of Requests for Information to SWEPCO* upon all known parties of record by fax and/or first class mail on this the 23th day of September 2019.

A handwritten signature in black ink, appearing to read 'Leslie Lindsey', is written over a horizontal line.

Leslie Lindsey

EXHIBIT A

**SOAH DOCKET NO. 473-19-6862
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APPLICATION OF SOUTHWESTERN	§	
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**CITIES ADVOCATING REASONABLE DEREGULATION'S
SECOND SET OF REQUESTS FOR INFORMATION TO
SOUTHWESTERN ELECTRIC POWER COMPANY**

- 2-1. Provide the forecasted annual energy production and average delivered cost of energy (\$/MWh) produced from each of the proposed wind energy facilities for each year the forecasted life of the facilities, with PTCs separately identified.
- 2-2. Provide SWEPCO's actual total native system energy sales by month for each of the last five calendar years and as forecasted for the first ten years of the base case modeling analyses supporting the proposed wind energy facilities.
- 2-3. Provide any benchmarking analyses conducted to assure that models used for SWEPCO's analyses of the Proposed wind energy facilities are accurately simulating the operations and production costs of SWEPCO's resources within the SPP market.
- 2-4. Provide the annual average equivalent availability, net heat rate and capacity factor for each SWEPCO generating unit for each of the last five calendar years, and as reflected in the Company's modeling analyses of the proposed wind energy resources.
- 2-5. Provide the estimated SPP firm capacity credit for each of the proposed wind energy resources for each year of the base case analysis supporting selection of the facilities.
- 2-6. Provide the estimated value of capacity of the proposed wind energy resources as reflected in the Company's economic modeling supporting the proposed wind resources in this case.

- 2-7. Provide the ancillary service costs incurred for existing SWEPCO wind energy resources for each of the last two calendar years.
- 2-8. Provide forecasted ancillary service costs for the proposed wind energy resources as included in each of the first ten years of the base case economic analyses supporting selection of such resources.
- 2-9. Provide workpapers supporting SWEPCO's O&M cost projections for the proposed wind energy resources.
- 2-10. Provide the basis for expected useful lives of each of the proposed wind energy resources.
- 2-11. Provide SWEPCO's system weighted average cost of fuel and purchased energy expressed on a \$/MWh basis for each of the last five calendar years and as forecasted for each year of the study period as reflected in the Company's base case analyses supporting the proposed wind energy resources.
- 2-12. Provide any analysis conducted by SWEPCO that quantifies the estimated fuel diversity benefit of the proposed wind energy resources.
- 2-13. Describe and provide documentation of other natural gas price hedging programs previously implemented or proposed by SWEPCO or its affiliates and discuss the regulatory treatment of costs of such programs.
- 2-14. Identify other utilities who have initiated natural gas price hedging programs similar in scope and financial scale to the investment associated with the proposed wind energy facilities in this case.
- 2-15. Explain the basis for the level of wind energy resources which SWEPCO proposes to acquire in this case and provide any analyses of costs and benefits of lower or higher levels of wind resource acquisitions considered by the Company.

- 2-16. Provide SWEPCO's system weighted average cost of gas (\$/MMBtu) for each month since January 2016 and as forecasted for each month of the first five years of the base case modeling analyses supporting the proposed wind energy resources.
- 2-17. Provide SWEPCO's system average cost of SPP market energy purchases (\$/MWh) for each month since January 2016 and as forecasted for each month of the first five years of the base case modeling analyses supporting the proposed wind energy resources.
- 2-18. Provide SWEPCO's system average cost of SPP market energy purchases (\$/MWh) during daily on-peak hours for each month since January 2016 and as forecasted for each month of the first five years of the base case modeling analyses supporting the proposed wind energy resources.
- 2-19. Provide SWEPCO's system average cost of SPP market energy purchases (\$/MWh) during daily off-peak hours for each month since January 2016 and as forecasted for each month of the first five years of the base case modeling analyses supporting the proposed wind energy resources.
- 2-20. Identify and explain the basis for any revisions made by SWEPCO to the input data set for the SPP market for the base case modeling analyses supporting the proposed wind energy resources.
- 2-21. Provide the commercial operation dates, assumed retirement dates, and net dependable capacity ratings (MW) of each existing and new SWEPCO generating resource included in the base case modeling analyses supporting the proposed wind energy resources.