

Control Number: 49737



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

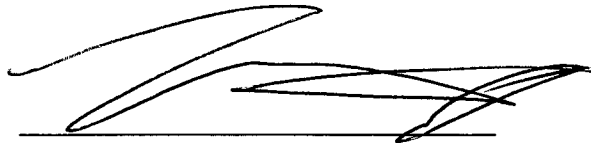
**APPLICATION OF SOUTHWESTERN §
ELECTRIC POWER COMPANY FOR §
CERTIFICATE OF CONVENIENCE § **BEFORE THE STATE OFFICE**
AND NECESSITY AUTHORIZATION § **OF**
AND RELATED RELIEF FOR THE § **ADMINISTRATIVE HEARINGS**
ACQUISITION OF WIND §
GENERATION FACILITIES §**

**INTERNATIONAL BROTHERHOOD OF ELECTRICAL WORKERS
LOCAL UNION 738'S FIRST REQUEST FOR INFORMATION
TO SOUTHWESTERN ELECTRIC POWER COMPANY**

International Brotherhood of Electrical Workers Local Union 738 (hereinafter "IBEW 738") files this request for information to Southwestern Electric Power Company ("SWEPCO") in the above-styled docket. SWEPCO is hereby requested to furnish one copy of all items of information enumerated on the attached sheets directly to the offices of *Deats Durst & Owen, P.L.L.C., 707 West 34th Street, Suite 3, Austin, Texas 78705*, within twenty (20) calendar days.

Respectfully submitted,

DEATS DURST & OWEN, PLLC

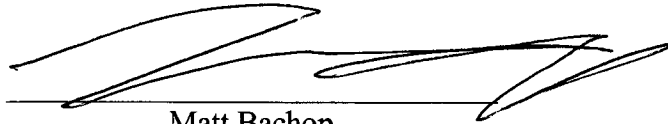


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ATTORNEY FOR IBEW 738

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was sent by e-mail on this 20th day of September, 2019, to all parties of record.



Matt Bachop

DEFINITIONS

As used in these Requests for Information, the following terms have the following meanings.

1. “Document” includes without limitation papers, books accounts, drawings, graphs, charts, photographs, electronic mail (e-mail), text messages, electronic or videotape recordings, and any other data compilations from which information can be obtained and translated, if necessary, by you into reasonably usable form, and includes carbon, photostatic, microfilm, xerox or other copies of same. Whenever you are asked in these requests to describe or identify documents, the term “documents” is not limited to documents in your actual or constructive possession, custody or control, but also includes all documents which you know to exist or to have existed or which you have reason to suspect to be in existence or to have been in existence.

Whenever you are asked in these requests to describe or identify documents which once existed but no longer exist, please indicate the approximate date and circumstances under which the documents ceased to exist.

Whenever you are asked in these requests to describe or identify documents which are not in your actual or constructive possession, custody or control, please identify (by name, address and telephone number) the person whom you believe to have such possession, custody or control.

2. “Person” means the singular as well as the plural, and includes any natural person, partnership, corporation, association or other entity, and its agents and employees.

3. “Identify” means the following when used herein:

(a) When used in reference to an individual it means to state his/her full name and present or last known business address or residential address and telephone number.

(b) When used in reference to a corporation, partnership or other business concern or entity, location or facility, it means to state its full name and present business address or location, telephone number, and the business conducted by such corporation, partnership, business or entity at such facility.

(c) When used in reference to communications it means to state in detail the substance thereof, the identity of the person or persons who made the communication and the person to whom it was made, and the persons who participated, the date and place thereof, and whether the communication was oral or in writing.

(d) When used in reference to a document it means to state a detailed description thereof including, if applicable, when, where and how it was made and to identify who made it, and to identify who has present or last known possession, custody or control thereof.

4. “Southwestern Electric Power Company” or “SWEPCO” refers to its parents, affiliates and subsidiaries, and any person acting or purporting to act on its behalf, including without limitation, attorneys, agents, advisors, investigators, representatives, employees or other persons.

5. “You,” “yours,” and “your” refer to SWEPCO, as defined above.

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- IBEW 1-1.** With respect to Mr. Brice's testimony that the proposed acquisition "will not result in the transfer of jobs from Texas" (p. 27:22-26), please identify the factors considered in asserting that jobs will not be transferred from Texas. Please identify and provide any documents reflecting the metrics or standards used in making any such determination.
- IBEW 1-2.** Please provide SWEPCO's forecast of the effect of the proposed acquisition on the future operations of SWEPCO's generation facilities in Texas. Please identify and provide any documents created, obtained, or reviewed in making the forecast.
- IBEW 1-3.** Please provide SWEPCO's forecast of the effect of the proposed acquisition on SWEPCO's future staffing levels. Please identify and provide any documents created, obtained, or reviewed in making the forecast.
- IBEW 1-4.** During the past five years, has the company performed or commissioned any assessments of its current staffing levels or future need? If so, please provide a copy of any such assessment.