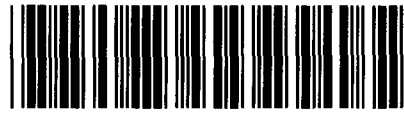


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Item Number: 186

Addendum StartPage: 0

RECEIVED  
SOAH DOCKET NO. 473-19-6862  
PUC DOCKET NO. 492879 NOV 26 AM 11:02

APPLICATION OF SOUTHWESTERN § PUBLIC UTILITY COMMISSION  
ELECTRIC POWER COMPANY FOR § FILING CLERK  
CERTIFICATE OF CONVENIENCE AND § PUBLIC UTILITY COMMISSION  
NECESSITY AUTHORIZATION AND §  
RELATED RELIEF FOR THE § OF TEXAS  
ACQUISITION OF WIND GENERATION §  
FACILITIES §

**EAST TEXAS ELECTRIC COOPERATIVE, INC.  
AND  
NORTHEAST TEXAS ELECTRIC COOPERATIVE, INC.'S  
SECOND REQUEST FOR INFORMATION TO  
SOUTHWESTERN ELECTRIC POWER COMPANY**

**TO:** Southwestern Electric Power Company, by and through his attorney of record, William Coe and Kerry McGrath, Duggins Wren Mann & Romero, LLP, 600 Congress Avenue, Suite 1900, Austin, TX 78701; and

Rhonda C. Ryan, American Electric Power Service Corporation, 400 West 15<sup>th</sup> Street, Suite 1520, Austin, TX 78701

**NOW COMES** East Texas Electric Cooperative, Inc. ("ETEC"), and Northeast Texas Electric Cooperative, Inc. ("NTEC") by and through its attorneys of record, and requests that Southwestern Electric Power Company ("SWEPCO") provide all the information requested and to answer under oath the questions propounded herein. The questions should be answered in the order in which they are asked and in sufficient detail to fully present all of the relevant facts.

**Instructions**

Please copy the question immediately above the answer to each and indicate at the bottom of each answer the name and job title of the person, other than counsel, chiefly responsible for preparation of the answer. Also state the name of the witness in this proceeding who will sponsor the answer to the question and who can vouch for the truth and veracity of the response given.

If any question appears confusing, please request clarification from the attorneys of record.

If SWEPCO asserts that any documents responsive to any request have been discarded or destroyed and are thus not available, state when, and explain why any such document was destroyed or discarded and identify the person directing the destruction or discarding; provide all

documents relating to any criteria or procedure of the company under which such document was discarded or destroyed.

If SWEPCO assets documents are under claim of privilege, please furnish a list identifying each document for which privilege is claimed, together with the following information: date, sender, recipient, recipient of copies, subject matter of document, and the basis upon which such privilege is claimed. Please also further support the privilege that you claim, with reference to applicable decisions and Attorney General Opinions.

If SWEPCO assets documents are protected from disclosure under the protective order, you must specifically state the provision of the Government Code that applies to the particular documents sought, and explain why the exception applies. A contention that information is excepted from disclosure in accordance with Section 552.101 should specifically identify the law, statute, or judicial decision that makes the information confidential. A contention that a document is protected under Section 552.104 or Section 552.110(b) requires a showing of some actual or specific harm in a particular competitive situation; a generalized allegation that a competitor will gain an unfair advantage will not suffice. ORD 541 at 4 (1990); ORD 661 at 5-6 (1999). A contention that a document is confidential under 552.110(a) should show that the information meets the definitions of a trade secret. ORD 552 at 2 (1990); ORD 402 (1983); Section 757, Restatement of Torts. as adopted by the Texas Supreme Court in *Hyde Corp. v. Huffines*, 314 S.W.2d 763, 776 (Tex.), *cert. denied*, 358 U.S.898 (1958). See also OR2002-3953 (2002).

These questions and requests are continuing in nature and should there be a change in circumstances, which would modify or change an answer supplied, then in such event you are requested to change or modify such answer under oath and to submit such changed answer as a supplement to your original answer.

### **DEFINITIONS**

For the purpose of this request for information, the expressions set forth below shall have the following meanings:

(1) "SWEPCO" or "the Company" refers to Southwestern Electric Power Company 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.

(2) “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, representative, employees or other persons.

(3) “You,” “your,” “yours,” and “Company” refer collectively to SWEPCO and AEP, including its officers, directors, agents, attorneys, consultants, employees, representatives, any other person or entity acting or purporting to act on their behalf.

(4) “Application” refers to the Application and supporting testimony, schedules and other documents submitted by SWEPCO and AEP in PUC Docket No. 49737.

(5) “Document” and “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, including, but not limited to memoranda, notes, analyses, minutes, records, photographs, correspondence, telegrams, electronic mail (email), cards, computer storage device or any other media, recordings, contracts, agreements, invoices, licenses, diaries, journals, accounts, pamphlets, books, ledgers, publications, microfilm, microfiche, drafts, 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, 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.

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

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

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

(9) The term “concerning” or one of its reflections, 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.

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

(11) “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.

(12) “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/AEP that was relied upon in support of the expressed contention, proposition, conclusion or statement.

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

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

(15) If any document is withheld under any claim of privilege, please furnish a list identifying each documents 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.

(16) If the response to any request is voluminous, please provide a detailed index of the voluminous material, pursuant to PUC PROC. R. 22.144(h)(4).

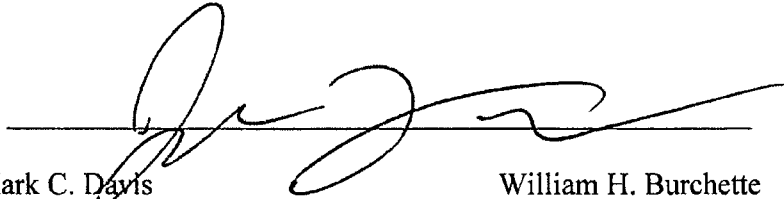
(17) If the information requested is included in previously furnished exhibits, workpapers, and responses to other discovery inquiries or otherwise, in hard copy or electronic format, please furnish specific references thereto, including Bate Stamp page citations and detailed cross-references.

(18) “Commission” and “PUC” means the Public Utility Commission of Texas; and

(19) "Staff" means the professional staff of the PUC

The requests for information are set forth on the attached list.

Respectfully Submitted,



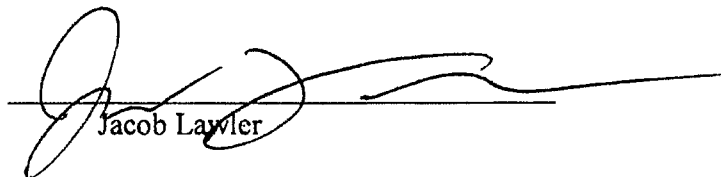
Mark C. Davis  
State Bar No. 05525050  
Adrienne M. Waddell  
State Bar No. 24098556  
Jacob J. Lawler  
State Bar No. 24076502  
**HOLLAND & KNIGHT, LLP**  
111 Congress Avenue, Suite 540  
Austin, Texas 78701  
(512) 472-1081 OFFICE  
(512) 472-7473 FAX

William H. Burchette  
DC Bar No. 957308  
W. Patrick Burchette  
DC Bar No. 1010944  
F. Alvin Taylor  
DC Bar No. 468545  
**HOLLAND & KNIGHT, LLP**  
800-17<sup>th</sup> Street, N.W., Suite 1100  
Washington, DC 20006  
(202) 955-3000 OFFICE  
(202) 955-5564 FAX

**ATTORNEYS FOR EAST TEXAS ELECTRIC COOPERATIVE, INC.  
AND  
NORTHEAST TEXAS ELECTRIC COOPERATIVE, INC.**

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the above and foregoing document, **ETEC/NTEC's Second Request For Information to Southwestern Electric Power Company**, was hand delivered, electronic transmission, faxed and/or mailed this 26<sup>th</sup> day of November 2019, by First Class, U.S. Mail, postage pre-paid to all parties of record.



Jacob Lawler

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

<b>APPLICATION OF SOUTHWESTERN</b>	<b>§</b>	
<b>ELECTRIC POWER COMPANY FOR</b>	<b>§</b>	
<b>CERTIFICATE OF CONVENIENCE AND</b>	<b>§</b>	<b>PUBLIC UTILITY COMMISSION</b>
<b>NECESSITY AUTHORIZATION AND</b>	<b>§</b>	
<b>RELATED RELIEF FOR THE</b>	<b>§</b>	<b>OF TEXAS</b>
<b>ACQUISITION OF WIND GENERATION</b>	<b>§</b>	
<b>FACILITIES</b>	<b>§</b>	

**EAST TEXAS ELECTRIC COOPERATIVE, INC.  
AND  
NORTHEAST TEXAS ELECTRIC COOPERATIVE, INC.'S  
SECOND REQUEST FOR INFORMATION TO  
SOUTHWESTERN ELECTRIC POWER COMPANY**

**GENERAL QUESTIONS**

- 2-1 Please provide, in machine readable, executable format, all power flow models, associated input files and output files related to the interconnection analysis of all RFP respondents, including the Selected Wind Facilities, performed by the Company or any consultants retained by the Company.
- 2-2 Please provide, in machine readable, executable format, all power flow models, associated input files and output files related to the interconnection analysis of all RFP respondents, including the Selected Wind Facilities, performed by Southwest Power Pool or consultants retained by Southwest Power Pool.
- 2-3 Please provide all work papers associated with any transmission analysis, including, but not limited to, transfer capability studies, deliverability studies, site selection studies, transmission planning analysis, that were included in the SWEPCO Integrated Resource Plan filed with the Louisiana Public Service Commission.
- 2-4 Please provide all work papers associated with any transmission analysis, including, but not limited to, transfer capability studies, deliverability studies, site selection studies, transmission planning analysis, that were included in the SWEPCO Integrated Resource Plan filed with the Arkansas Public Service Commission.
- 2-5 Please provide all work papers associated with any transmission analysis, including, but not limited to, transfer capability studies, deliverability studies, site selection studies, transmission planning analysis, that were included in the PSO Integrated Resource Plan filed with the Oklahoma Corporation Commission.

- 2-6 **CONFIDENTIAL** -- With reference to SWEPCO's response to TIEC RFI 2-4 (confidential), please provide all documents—including without limitation communications, work papers, studies, and analyses—concerning **XX XX XXXXXX XXXXXX**. Please describe **XX XXXXXX** in greater detail. Please state whether and how **XX XXXXXX** would apply to FERC wholesale customers.

**TESTIMONY OF THOMAS P. BRICE**

- 2-7 For each of the Selected Wind Facilities, please provide the following information:
- a. The cost of interconnecting each Selected Wind Facility to the SPP transmission system, in total dollars and in \$/kW, and
  - b. The cost of assigned network upgrade costs assigned to each Selected Wind Facility, in total dollars and in \$/kW.
- 2-8 Please provide the following information related to the information presented in Table 2 of Witness Brice's direct testimony.
- a. The total congestion cost component of each scenario,
  - b. The congestion cost of each scenario by the individual Selected Wind Facility,
  - c. The total losses cost component of each scenario, and
  - d. The total losses cost of each scenario by the Selected Wind Facility.
- 2-9 From page 14, lines 7-8 of Witness Brice's direct testimony, please explain how adding the Selected Wind Facilities will allow the Company to better manage congestion risk if the congestion costs associated with each scenario only decrease the customer benefits of the Selected Wind Facilities?
- 2-10 From page 14, lines 18-23 of Witness Brice's direct testimony, if the addition of the proposed generation tie-line is the solution to relieve congestion in the future, please provide any studies or work papers that show analysis of other transmission alternatives that could provide congestion relief without the generation tie-line.
- 2-11 Please provide all studies or work papers that evaluate the benefit-to-cost ratio of the addition of the generation tie-line versus the increased congestion associated with the Selected Wind Facilities.
- 2-12 From page 15, lines 3-10 of Witness Brice's direct testimony, please describe what changes the Company is expecting related to frequency regulation, ancillary services and congestion charges where the direct operational control would benefit the Company.
- 2-13 From page 15, lines 3-10 of Witness Brice's direct testimony, please describe any positions the Company has taken in any SPP stakeholder meeting related to frequency regulation, ancillary services and congestion charges where the proposed position would improve the benefit the direct operational control of the Selected Wind Facilities would provide.



- 2-14 From pages 16 and 17 of Witness Brice’s direct testimony, please describe who will bear the risk of the following guarantees and will keep the ratepayers whole:
1. Capital Cost Cap Guarantee
  2. Production Tax Credit Eligibility Guarantee
  3. Minimum Production Guarantee
- 2-15 Please provide any and all contractual language or other means by which SWEPCO seeks to hedge the exposure to each of the following guarantees:
1. Capital Cost Cap Guarantee
  2. Production Tax Credit Eligibility Guarantee
  3. Minimum Production Guarantee
- 2-16 From page 17, lines 8-9 of Witness Brice’s direct testimony, please provide any analyses, work papers, documents or correspondence related to the Company’s assessment of the curtailment risk in SPP as part of the development of the Minimum Production Guarantee.
- 2-17 From page 18, line 23 of Witness Brice’s direct testimony, please provide the following related to the assessment of long-term deliverability:
- a. Power flow models, input files, and outputs in machine-readable, executable format for each Respondent.
  - b. Correspondence related to the development of the assumptions and methodology used to conduct the long-term deliverability assessment.
- 2-18 From page 28 lines 5-8 of Witness Brice’s direct testimony, please provide the terms and language from the respective purchase agreements that provide “performance assurance and risk mitigation to protect SWEPCO customers”. Please also provide a cost estimate and expected benefit value for each of the referenced terms providing performance assurance and risk mitigation.

**TESTIMONY OF JAY F. GODFREY**

- 2-19 Please provide all correspondence between SWEPCO or AEPSC staff and the consultant for the Louisiana Public Service Commission related to changes to the draft RFP.
- 2-20 Please provide the Definitive Interconnection System Impact Studies (DISIS) for all bidders in response to the Eligibility and Threshold Requirement in RFP 9.14.
- 2-21 From page 13, line 15 through page 14, line 1 of Witness Godfrey’s direct testimony, please describe what criteria and threshold is used to determine the “severely limited” status of deliverability to the AEP West load zone.
- 2-22 For each project, please provide the information referenced in RFP 5.1.

- 2-23 Please provide all work papers, reports, documents, outputs, and power flow data, including, but not limited to models and input files in machine readable, program executable format used in the development of (i) the DFAX analysis, and (ii) the FCITC analysis.
- 2-24 From page 20, Table 4 of Witness Godfrey's direct testimony, the nameplate MW capacities for the three selected projects are listed. Please provide the Summer Net Renewable Capability in total MWs for each project as determined by the accreditation calculation tool for wind and/or solar renewable resources based on SPP Planning Criteria 7.1.5.3 Section 7.
- 2-25 From page 22, lines 4-7 of Witness Godfrey's direct testimony, the PSA structure mitigates the projects' "schedule risk since closing (the actual purchase of the project) does not occur until on or about timely completion of the project." How is the Production Tax Credit Eligibility Guarantee risk mitigated?
- 2-26 From page 26 of Witness Godfrey's direct testimony, the total purchase price for the Selected Wind Facilities is approximately \$1,253/kW, which includes all costs associated with interconnecting the facilities to the SPP transmission system and any assigned network upgrade costs. Please provide the approximate \$/kW cost of capacity for the selected projects based on their Summer Net Renewable Capability.

#### **TESTIMONY OF JOSEPH G. DERUNTZ**

- 2-27 From page 13, lines 14-20 of Witness Deruntz, the Companies will retain review rights on all contracts Invenergy enters above a certain dollar amount before they are executed. Are the land leases for siting the wind turbines, collector system, supporting facilities and or substation based on fixed price or indexed to WTG production?

#### **TESTIMONY OF AKARSH SHEILENDRANATH**

- 2-28 Please describe how the presence of the generation tie-line was treated in the PROMOD, Aurora and PLEXOS analyses.
- 2-29 If congestion values are held constant from 2031-2051, is the proposed generation tie-line assumed to be in place by 2030? If not, when is the expected in-service date of the tie-line?
- 2-30 Did the models used assume any transmission upgrades contemplated between 2022 and 2024 will be in service?
- a. Are there any new projects in the 2024 models that will not be in service in 2022? If so, please list the project.
  - b. Are there any new projects in the 2024 models that will not be in service in 2023? If so, please list the project.

- 2-31 In Figure 1 on page 7 of Witness Sheilendranath's direct testimony, is the congestion cost calculated on a gen-weighted basis for both the source and the sink? What is the difference in the congestion values if a load-weighted hub for the AEP West load zone is used?
- 2-32 Please provide the PROMOD models and associated outputs used to generate the values in Figure 1 on page 7 of Witness Sheilendranath's direct testimony.

**TESTIMONY OF KAMRAN ALI**

- 2-33 Please provide the criteria used to group generators into the nine clusters, including the following information:
- a. The highest and lowest DFAX for every generator in each cluster regardless of impacted element,
  - b. The highest and lowest DFAX for every generator in each cluster for each impacted element,
  - c. The criteria used to exclude transmission system elements from the DFAX calculation,
  - d. Any correspondence received by or initiated by Witness Ali regarding the assumptions, methodology, approach, or results of the DFAX analysis.
- 2-34 On page 8, line 6 of Witness Ali's direct testimony, please describe the criteria used to determine "reasonable outage scenarios." Please admit or deny that the criteria differs from the Company's FCITC analysis used in any other studies performed for the Company. If admit, please explain why and how the criteria differs.
- 2-35 Please provide a copy of the Company's NERC TPL criteria.
- 2-36 Please provide a list of all changes made to the SPP ITP models for the Transmission Congestion Screening Analysis, including, but not limited to:
- a. Each Generator addition,
  - b. Each Transmission System topology change,
  - c. Any changes to load values,
  - d. Any changes to fuel forecast, and
  - e. Any changes to generator parameters.

- 2-37 Referencing page 9, lines 8-10 of Witness Ali's direct testimony, please explain how "the impacts of transmission facilities planned to be upgraded as part of any added generator's network upgrades identified in their specific SPP system impact study were also included." Please provide the SPP System Impact Study reports for each generator addition referenced in regard to the aforementioned statement from Witness Ali's direct testimony.

**TESTIMONY OF JOHN F. TORPEY**

- 2-38 On page 18, lines 12-13 of Witness Torpey's direct testimony, what is the Selected Wind Facilities' capacity MW value used to calculate benefits? How does this MW value compare to the Summer Net Renewable Capability MW value calculated for the Selected Wind Facilities based on SPP Planning Criteria 7.1.5.3 Section 7?
- 2-39 From page 10, lines 15-19 of Witness Torpey's direct testimony, please provide the basis for the assumption to cap the addition of wind resources to "a maximum of roughly forty percent of each company's energy production to prevent the model from selecting an amount of wind resources that could be inconsistent with maintaining SPP's grid stability."
- a. Please provide any documents, white papers or presentations developed by SPP that the Company relied upon to assess SPP grid stability.
  - b. Does the location of wind resources impact the stability of the SPP grid?
  - c. What assumptions did the Company make in the PROMOD, AURORA, or PLEXOS models regarding the location of planned wind facilities that could have a negative impact on SPP grid stability?
- 2-40 Does the PLEXOS model use a transmission system model to calculate locational impacts or is the model solely used to compute an average price for each region?
- 2-41 Please describe how the Company computed the amount and deliverability associated with off-system sales.
- 2-42 From page 21, lines 17-20 of Witness Torpey's direct testimony, please explain how the change from the existing SWEPCO fleet is minimal when the addition of the Selected Wind Facilities is supposed to reduce the energy output of coal facilities from 83% to 44%.
- 2-43 Please provide the basis for the in service date of the gen-tie in 2026.

**TESTIMONY OF JOHANNES P. PFEIFENBERGER**

- 2-44 Please provide any changes to the SPP transmission expansion that have been identified that are not included in the Company's analysis.
- 2-45 Please confirm that the load forecast used in the PLEXOS, AURORA and PROMOD models are the same.
- 2-46 Please confirm or deny: The load in the PROMOD is not grossed up for losses.

- 2-47 What is the expected MW and percent penetration of wind facilities in 2024 and 2029 in the SPP region as referenced on Page 7, Lines 6-9 of Witness Pfeifenberger's direct testimony.
- 2-48 If the projected wind penetration in SPP is greater than 40%, please explain why wind penetration in SWEPCO and PSO was limited to 40% in Witness Torpey's direct testimony.
- 2-49 Please provide any documents, white papers or presentations relied upon to make the assumption that coal and gas-fired generators over the age of 60 will be retired.
- 2-50 How are the concerns regarding SPP grid stability impacted by the assumed retirement of the coal and gas-fired generation over the age of 60. Please provide any stability analysis conducted by the Company or SPP that shows the impact of the coal and gas-fired generation as referenced above.
- 2-51 Please provide a list of all transmission projects placed into service in the SPP region from 2014 to 2019.
- 2-52 Referencing page 15, lines 3-5 of Witness Pfeifenberger's direct testimony, please provide the analysis of all transmission alternatives considered by the Company that were considered to mitigate congestion costs.
- 2-53 Please provide congestion hedges for each Company generating asset or purchased power agreement, including:
- a. The source and sink of each congestion hedge,
  - b. The requested volume of each congestion hedge,
  - c. The granted volume of each congestion hedge, and
  - d. The time period covered by each congestion hedge.
- 2-54 Please provide the event (.eve) file used for each PROMOD case.
- 2-55 At what MW level of penetration will SPP achieve a 40% wind penetration level:
- a. In 2024?
  - b. In 2029?
- 2-56 Please provide any documents, work papers, presentations, and notes regarding the "constraint identification" step referenced in footnote 7 of Witness Pfeifenberger's direct testimony, including:
- a. The initial event file provided by SPP,
  - b. The constraints considered by the Company in the "constraint identification" step, and
  - c. The final event file used for each PROMOD case.

- 2-57 Referencing page 20, lines 13-15 of Witness Pfeifenberger's direct testimony, please provide all work papers, models, input files, output files, reports and presentations detailing the "likely future transmission upgrades" the Company included in their refinement of the SPP PROMOD case.
- 2-58 Please provide the SRP RFP IE Briefing, dated April 16, 2019 (see page 26 of Witness Pfeifenberger's direct testimony).
- 2-59 Please confirm or deny: The PROMOD model can be used to calculate the SPP Central market prices.
- 2-60 Is the scaling of the market prices between PROMOD and AURORA performed based on the monthly difference or the annual difference? If based on the annual difference, please explain the reason for not using monthly scaling.

### **TESTIMONY OF JOHN AARON**

- 2-61 In reference to the direct testimony of SWEPCO witness John Aaron, page 6, lines 18 through 23, please explain why SWEPCO is using an estimated energy allocator to allocate the revenue requirement of the proposed wind facilities and PTCs in the current docket, rather than the estimated kW demand allocator described on page 6, lines 13 through 20, of the direct testimony of SWEPCO witness John Aaron in Docket No. 47461. Include an explanation of what is different and/or what has changed regarding the allocation of wind facility costs since Docket No. 47461.
- 2-62 Please calculate the estimated kW demand allocators for the Arkansas, Louisiana, and Texas retail jurisdictions, for the FERC wholesale jurisdiction (by state and by customer), and for all Texas customer classes using the allocation methodology shown on Exhibit JOA-2 from Docket No. 47461.