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SOAH DOCKET NO. 473-19-6862
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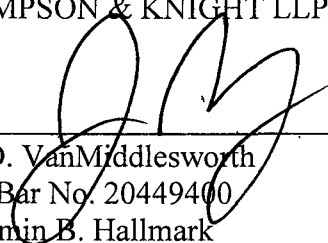
APPLICATION OF SOUTHWESTERN § BEFORE THE STATE OFFICE
ELECTRIC POWER COMPANY FOR §
CERTIFICATE OF CONVENIENCE § PUBLIC UTILITY COMMISSION
AND NECESSITY AUTHORIZATION § FILING CLERK
AND RELATED RELIEF FOR THE § OF
ACQUISITION OF WIND §
GENERATION FACILITIES § ADMINISTRATIVE HEARINGS

**TEXAS INDUSTRIAL ENERGY CONSUMERS' SUPPLEMENTAL RESPONSE TO
SOUTHWESTERN ELECTRIC POWER COMPANY'S
FIRST REQUEST FOR INFORMATION**

Texas Industrial Energy Consumers ("TIEC") files the following supplemental response to the First Requests for Information ("RFI") to TIEC filed by Southwestern Electric Power Company ("SWEPCO"). The request was filed at the Commission and received by TIEC on January 21, 2020. Accordingly, pursuant to the procedural schedule entered in this case, TIEC's supplemental response is timely filed. TIEC's supplemental 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 supplemental responses may be treated as if they were filed under oath.

Respectfully submitted,

THOMPSON & KNIGHT LLP



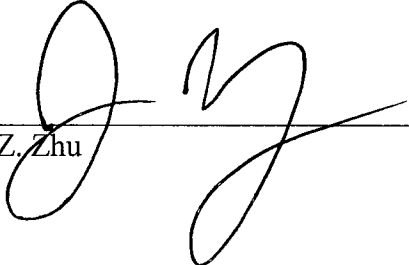
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**ATTORNEYS FOR TEXAS INDUSTRIAL
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CERTIFICATE OF SERVICE

I, James Z. 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 14 day of February, 2020 by facsimile, electronic mail and/or first Class, U.S. Mail, Postage Prepaid.

James Z. Zhu 

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SWEPKO-TIEC 1-10: Please identify all utilities known to Mr. Pollock or Mr. Griffey that use NYMEX futures in their system planning forecasts in any fashion and an explanation of how each identified utility uses them in its forecasts.

RESPONSE

See the response to SWEPKO-TIEC 1-9 above. Additionally, Mr. Pollock is aware that Entergy uses NYMEX futures in their system planning forecasts for at least the near term. In its CCN application for the Montgomery County Power Station, Entergy's gas price forecast was described as follows:

Entergy's gas price forecast methodology is based on the use of the NYMEX futures for the first year of the forecast period and use of the average of fundamental-based independent third-party consultant forecasts for years 3-20, followed by escalation based on constant real dollars. For years 2-3, Entergy interpolates between the NYMEX and fundamental forecast. This methodology is consistent with the methodology used by other utilities for planning and evaluation purposes and also relies heavily on third-party independent forecasts, which eliminates any forecast bias. (Application of Entergy Texas, Inc. For Approval of a Certificate of Convenience and Necessity Regarding Construction of Montgomery County Power Station, Docket No. 46416, Testimony of Wayne J. Oliver As Independent Monitor at 46.)

SUPPLEMENTAL RESPONSE (FEBRUARY 14, 2020):

Mr. Pollock recently became aware that the South Carolina Department of Administration, in a February 11, 2020 report evaluating various options for the future management of Santee Cooper, used a long-term natural gas price forecast that uses NYMEX market forward prices from 2020-2029 and then gradually transitions those market prices to the EIA Reference Case forecast by 2039. The discussion of the long-term natural gas price forecast can be found on pages 38 to 39 of the report, which is publicly available at the following link:

<https://admin.sc.gov/sites/default/files/Report%20of%20the%20DOA%20Regarding%20the%20South%20Carolina%20Public%20Service%20Utility.pdf>

Preparer: Jeffry Pollock
Sponsor: Jeffry Pollock