



Control Number: 51415



Item Number: 101

Addendum StartPage: 0

RECEIVED

SOAH DOCKET NO. 473-21-0538 2020 DEC 10 PM 2: 37
PUC DOCKET NO. 51415

PUBLIC UTILITY COMMISSION
REGULATORY DIVISION

APPLICATION OF SOUTHWESTERN § BEFORE THE STATE OFFICE
ELECTRIC POWER COMPANY FOR § OF
AUTHORITY TO CHANGE RATES § ADMINISTRATIVE HEARINGS

**OFFICE OF PUBLIC UTILITY COUNSEL'S
FIFTH REQUEST FOR INFORMATION TO
SOUTHWESTERN ELECTRIC POWER COMPANY**

Pursuant to 16 Texas Administrative Code (“TAC”) § 22.144, the Office of Public Utility Counsel (“OPUC”) submits this Fifth Request for Information to Southwestern Electric Power Company (“SWEPCO”). OPUC requests that SWEPCO provide answers to the request for information under oath as required by 16 TAC § 22.144(c)(2)(F) within the timeframe specified in the procedural schedule in this proceeding, or within 20 days pursuant to 16 TAC § 22.144(c)(1) if a procedural schedule has not been adopted. OPUC further requests that SWEPCO provide an answer to the questions and sub-questions in the order listed below with sufficient detailed information to provide a complete and accurate answer to each question and sub-question.

Definitions

1. “SWEPCO,” the “Company,” “Applicant,” “You,” and “Your” refer 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. “Document” and “documents” include any written, recorded, filmed, or graphic matter, whether produced, reproduced, or on paper, cards, tape, film, electronic facsimile, computer storage device, or any other media, including, but not limited to, electronic mail (e-mail), 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, summaries of interviews, reports of consultants, appraisals, forecasts, tape recordings, or any form of recording that is capable of being transcribed into written form.

Instructions

1. The Definitions, Instructions, and Claim of Privilege sections set forth in this request for information apply to these questions.
2. In providing an answer to each question, please furnish all of the information that is in your possession, custody, or control, as defined by Texas Rules of Civil Procedure (Tex. R. Civ. Proc.) 192.7(b), including information in the possession, custody, or control of your 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.
3. Please answer each question based upon your knowledge, information, or belief, and state whether each answer is based upon your knowledge, information, or belief.
4. If you have possession, custody, or control, as defined by Tex. R. Civ. Proc. 192.7(b), of an original requested document, please produce the original requested document or a complete copy of the original requested document and all copies that are different in any way from the original requested document, whether by interlineation, receipt stamp, or notation.
5. If you do not have possession, custody, or control of an original requested document, please produce copies of the document, however made, in your possession, custody, or control. If any requested document is not in your possession, custody, or control, please explain why the document is not in your possession, custody, or control and provide the current location and custodian of the requested document or any copy, summary, or other form of the requested document thereof.
6. If there is any confusion about a question, please contact the undersigned counsel for clarification.
7. In providing your response to a question, please start each response on a separate page and type, at the top of the page, the question that is being answered by the response.
8. As part of the response to each question, please state, at the bottom of the answer to the question, the name and job position of each person(s) who participated in any way, other

than by providing clerical assistance, in the preparation of the answer to the question. If the question has sub-parts, please identify each person(s) by name and job position that participated in any way, other than by providing clerical assistance, in the preparation of the answer for each sub-part of the question.

9. Please state the name of the witness in this docket who will sponsor the answer to the question and/or sub-part of the question and who will swear to the truthfulness of the answer to the question and/or sub-part of the question.
10. Please provide individual responses to questions as each response becomes available, rather than waiting to provide all of the responses to the questions at the same time.
11. These questions are continuing in nature. If there is a change in circumstances or facts or if you receive or generate additional information that changes your answer to a question between the time of your original response and the time of the hearing, then you should submit, under oath, a supplemental response to your earlier answer to the question.
12. If you consider any question to be unduly burdensome, or if the response would require the production of a voluminous amount of material, please contact the undersigned counsel, as soon as possible, to discuss the situation and try to resolve the issue. Furthermore, if you object to any question on the grounds that the question seeks confidential information, or on any other grounds, please contact the undersigned counsel, as soon as possible, to discuss the situation and try to resolve the issue.
13. If the response to any question is voluminous, please make available all of the voluminous material at a designated location in Austin. Please provide a detailed index for the voluminous material with your response to the question to enable efficient review of the material. The index should include information sufficient to locate each individual document by page, file, and box number, date of each document, title of each document, description of each document if no document title exists, name of the preparer of each document, and length of each document.
14. If the requested information is included in previously furnished exhibits, workpapers, or 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 to the previously furnished information.

15. If a question requests the production of copyrighted material, you may provide a list of such material, including the title, publisher, author, edition, and page references relied on or otherwise relevant to the question.

Claim of Privilege

If any document is withheld under any claim of privilege, please provide a list that identifies each document for which a privilege is being claimed, including the date, sender, recipient(s) of the privileged document, recipient(s) of copies of the privileged document, subject matter of the privileged document, and the basis upon which a privilege is being claimed by the Company.

SOAH DOCKET NO. 473-21-0538
PUC Docket No. 51415
OPUC's Fifth Request for Information to
Southwestern Electric Power Company

- 5-1. Please reference Highly Sensitive Schedule E-2.3, sponsored by Amy Jeffries. Please confirm or deny that the proposed fuel inventory for Dolet Hills will continue to be used as needed, without any additions. If deny, please provide the monthly inventory levels anticipated during the 2021 operations.
- 5-2. Please reference ETI's Response to Cities Advocating Reasonable Deregulation's ("CARD") 2nd RFI No. 2-15. Please provide a detailed listing of the capital investment made during the test year that was booked into "Forestry." Please include the project number, a description of the assets, and the amount capitalized by major cost category (e.g. labor and labor-related, materials, physical asset costs).
- 5-3. Please reference ETI's Response to OPUC RFI No. 1-2. In an article written by Scott McCloud, dated October 30, 2017, as included in the SWEPCO CONNECTIONS, News & Perspectives from SWEPCO, there is reference to \$140 million of capital investment to move the mining operations to the Oxbow Mining area in order to serve Dolet Hills. Please provide copies of any documentation that related to this referenced investment as well as documentation that shows the need for this investment.
- 5-4. Please refer to the Direct Testimony of Mr. John O. Aaron, page 17 and Exhibit JOA-2. Please provide all workpapers in their native format for the calculation of the A&E 4 CP allocator and the accompanying calculation of the labor factor utilized in the determination of the A&E 4 CP allocator.
- 5-5. Please refer to the Direct Testimony of Mr. Paul Pratt Jr, page 21. Please provide a detailed description of the costs and associated amounts that are included in SWEPCO's application and relate specifically to Managed Accounts. Please provide a description of how these costs are allocated to each customer class and the amounts allocated to each customer class.
- 5-6. Please refer to the Direct Testimony of Mr. John O. Aaron, pages 18 and 19 and Schedule P-7, page 26 of 61. Please provide an explanation of the derivation of the demand allocation factors and the customer allocation factors for the Distribution Allocation Factors.
- 5-7. Please refer to the Direct Testimony of Mr. Michael Baird, page 23. Please provide a calculation of the amount by which the retirement of Dolet Hills and the proposal to recover the unrecovered undepreciated balance (after the TCJA refund offset) impacts the revenue requirement for Texas customers by customer class. Please provide the same analysis of the impact to the Texas revenue requirement by customer classes if the unrecovered undepreciated balance is not allowed to be recovered over four years, but continues to be recovered using the currently approved depreciation rates.

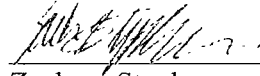
SOAH DOCKET NO. 473-21-0538
PUC Docket No. 51415
OPUC's Fifth Request for Information to
Southwestern Electric Power Company

- 5-8.** Please refer to the Direct Testimony of Mr. Michael Baird, page 23. Please provide the impacts to the Company's proposed Texas jurisdiction's revenue requirements by customer class if the retirement of Dolet Hills occurs in 2026. Please include in your response the remaining depreciable balance of the Dolet Hills facility in 2026 at the total Company level and for the Texas jurisdiction.
- 5-9.** Please refer to the Direct Testimony of Ms. Jennifer Jackson, Exhibit JLJ-3. Please provide cost information for the proposed monthly charge for the second meter for the PEV Rider of \$8.91/month. Additionally, please provide the cost basis for the off-peak credit of \$0.03310/kWh.

Dated: December 10, 2020

Respectfully submitted,

Lori Cobos
Chief Executive & Public Counsel
State Bar No. 24042276

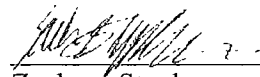


Zachary Stephenson
Assistant Public Counsel
State Bar No. 24073402
Tucker Furlow
Senior Assistant Public Counsel
State Bar No. 24060897
Chris Ekoh
Senior Managing Public Counsel
State Bar No. 06507015

OFFICE OF PUBLIC UTILITY COUNSEL
1701 N. Congress Avenue, Suite 9-180
P.O. Box 12397
Austin, Texas 78711-2397
512-936-7500 (Telephone)
512-936-7525 (Facsimile)
zachary.stephenson@opuc.texas.gov
tucker.furlow@opuc.texas.gov
chris.ekoh@opuc.texas.gov
opuc_eservice@opuc.texas.gov (Service)

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing document was served on all parties of record in this proceeding on this 10th day of December 2020, by facsimile, electronic mail, and/or First class, U.S. Mail.



Zachary Stephenson