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SOAH DOCKET NO. 473-21-0538
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PUBLIC UTILITY COMMISSION
FILING CLERK

APPLICATION OF SOUTHWESTERN § PUBLIC UTILITY COMMISSION
ELECTRIC POWER COMPANY FOR §
AUTHORITY TO CHANGE RATES § OF TEXAS

**COMMISSION STAFF'S SEVENTH REQUEST FOR INFORMATION
TO SOUTHWESTERN ELECTRIC POWER COMPANY
QUESTION NO. STAFF 7-1**

Pursuant to 16 Texas Administrative Code (TAC) § 22.144 of the Commission's Procedural Rules, the Staff of the Public Utility Commission of Texas (Staff) requests that Southwestern Electric Power Company (SWEPCO) and through its attorneys of record, provide the following information and answer the following question(s) under oath. The question(s) shall be answered in sufficient detail to fully present all of the relevant facts, within the time limit provided by the Presiding Officer or within 20 days, if the Presiding Officer has not provided a time limit. Please copy the question immediately above the answer to each question. These question(s) are continuing in nature, and if there is a relevant change in circumstances, submit an amended answer, under oath, as a supplement to your original answer. State the name of the witness in this cause who will sponsor the answer to the question and can vouch for the truth of the answer.

Provide responses to the Requests for Information by filing with the Commission solely through the Interchange on the Commission's website and provide notice, by email, to all other parties that the pleading or document has been filed with the Commission, unless otherwise ordered by the presiding officer pursuant to the Order Suspending Rules in Docket No. 50664.

Dated: December 15, 2020

Respectfully submitted,

**PUBLIC UTILITY COMMISSION OF TEXAS
LEGAL DIVISION**

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CERTIFICATE OF SERVICE

I certify that, unless otherwise ordered by the presiding officer, notice of the filing of this document was provided to all parties of record via electronic mail on December 15, 2020, in accordance with the Order Suspending Rules, issued in Project No. 50664.

/s/ Robert Dakota Parish
Robert Dakota Parish

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**COMMISSION STAFF'S SEVENTH REQUEST FOR INFORMATION
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QUESTION NO. STAFF 7-1**

DEFINITIONS

- 1) "SWEPCO" or "Company" or "you" refers to Southwestern Electric Power Company, 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" includes any written, recorded, or graphic matter, however produced or reproduced, including but not limited to correspondence, telegrams, contracts, agreements, notes in any form, memoranda, diaries, voice recording tapes, microfilms, pictures, computer media, work papers, calendars, minutes of meetings or other writings or graphic matter, including copies containing marginal notes or variations of any of the foregoing, now or previously in your possession. In the event any documents requested by this Request for Information have been transferred beyond the Company's control, describe the circumstances under which the document was destroyed or transferred and provide an exact citation to the subject document. In the event that documents containing the exact information do not exist, but documents do exist which contain portions of the required information or which contain substantially similar information, then the definition of "documents" shall include the documents which do exist, and these documents will be provided.

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INSTRUCTIONS

- 1) Pursuant to 16 TAC § 22.144(c)(2), Staff requests that answers to the requests for information be made under oath.
- 2) Please copy the question immediately above the answer to each question. State the name of the witness in this cause who will sponsor the answer to the question and can vouch for the truth of the answer.
- 3) These questions are continuing in nature, and if there is a relevant change in circumstances, submit an amended answer, under oath, as a supplement to your original answer.
- 4) Words used in the plural shall also be taken to mean and include the singular. Words used in the singular shall also be taken to mean and include the plural.
- 5) The present tense shall be construed to include the past tense, and the past tense shall be construed to include the present tense.
- 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 or copies, subject matter of the document, and the basis upon which such privilege is claimed.
- 7) Pursuant to 16 TAC § 22.144(h)(4), if the response to any request is voluminous, please provide a detailed index of the voluminous material.
- 8) Staff requests that each item of information be made available as it is completed, rather than upon completion of all information requested.

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COMMISSION STAFF'S SEVENTH REQUEST FOR INFORMATION
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QUESTION NO. STAFF 7-1

Staff 7-1 Regarding the SWEPCO Forestry Right-of-Way (ROW) Widening program, please answer the following:

- a) Please explain and provide the dollar amount of the expenses from this project that were incurred for the rebuilding, reconductoring, or upgrading of existing transmission facilities and provide the amount that was used for the clearing of additional ROW, if any.
- b) Please explain and provide the dollar amount of the expenses from this project that were incurred in association with or for new transmission facilities.
- c) Please explain why the expenses from this project were not included in the original ROW clearing for facilities.
- d) If these vegetation management expenses were incurred for existing lines, please provide documentation showing the dates the expenses were incurred for the existing transmission lines and the date those existing lines were energized. Please provide the information per transmission line.
- e) To which FERC account were the expenses charged?
- f) Please describe in detail how the company keeps track of specific vegetation management that SWEPCO categorizes as a capital expense under this project and how the company keeps track of specific vegetation management that it categorizes as O&M.
- g) How is this accomplished if the transmission facilities are not new facilities?
- h) How do personnel in the field differentiate these activities (capital vegetation management versus O&M vegetation management) when they perform the work? Are both types of vegetation management performed at the same time by the same personnel or are they assigned as different jobs which are performed separately?