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PUC DOCKET NO. 51415

APPLICATION OF SOUTHWESTERN §  
ELECTRIC POWER COMPANY FOR §  
AUTHORITY TO CHANGE RATES §

PUBLIC UTILITY COMMISSION  
OF TEXAS

**TEXAS INDUSTRIAL ENERGY CONSUMERS’  
FIRST REQUEST FOR INFORMATION TO SWEPCO**

Pursuant to 16 T.A.C. § 22.144, Texas Industrial Energy Consumers (“TIEC”) requests that Southwestern Electric Power Company (“SWEPCO”) provide all of the information requested in Exhibit “A” within the time frame specified under the procedural rules.

Pursuant to 16 T.A.C. § 22.144(c)(2), TIEC further requests that answers to the requests for information be made under oath. Each answer should identify the person responsible for preparing that answer (other than the purely clerical aspects of its preparation) and the name of the witness in this proceeding who will sponsor the answer and who can vouch for its accuracy. In producing documents pursuant to this request for information, please indicate the specific request(s) to which the document is being produced. These requests are continuing in nature, and should there be, for any reason, a change in circumstances which would modify or change an answer supplied by you, such changed answer should be submitted immediately as a supplement to your original answer pursuant to 16 T.A.C. § 22.144(i). Please answer each request and sub-request in the order in which they are listed and in sufficient detail to provide a complete and accurate answer to the request. TIEC further requests that each item of information be made available as it is completed, rather than upon compilation of all information requested.

All information responsive to the requests on the attached Exhibit “A” should be sent to the following persons via overnight courier, on a piecemeal basis as individual items become available:

Mr. Rex D. VanMiddlesworth  
Mr. Benjamin B. Hallmark  
Mr. James Z. Zhu  
Thompson & Knight LLP  
98 San Jacinto Blvd., Suite 1900  
Austin, Texas 78701  
(512) 469.6100  
(512) 469-6180 Fax  
[rex.vanm@tklaw.com](mailto:rex.vanm@tklaw.com)  
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### **DEFINITIONS AND INSTRUCTIONS**

“SWEPCO” refers to Southwestern Electric Power Company, and its affiliates, subsidiaries, and any person acting or purporting to act on their behalf, as it relates to this proceeding and related appeals, including without limitation, attorneys, agents, advisors, investigators, representatives, employees or other persons.

“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, representatives, employees or other persons.

The terms “document” or “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, e-mail, cards, recordings, contracts, agreements, invoices, licenses, diaries, journals, accounts, pamphlets, books, ledgers, publications, microfilm, microfiche 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.

Pursuant to Rule 196.4 of the Texas Rules of Civil Procedure, TIEC specifically requests that any electronic or magnetic data (which is included in the definition of “document”) that is responsive to a request herein be produced on CD-Rom in a format that is compatible with Microsoft, Macintosh and/or Word Perfect and be produced with your response to these requests. If emails are responsive to these requests, please provide a printed copy of the entire email string. Attachments to emails should be printed or, if the attachment is an Excel or other similar file, should be provided in native format on CD-Rom.

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

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

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

The term “concerning,” or one of its inflections, 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.

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

“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.

“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 that was relied upon in support of the expressed contention, proposition, conclusion or statement.

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.

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

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 of copies, subject matter of the document, and the basis upon which such privilege is claimed.

Pursuant to P.U.C. PROC. R. 22.144(h)(4), if the response to any request is voluminous, please provide a detailed index of the voluminous material.

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 Bates Stamp page citations and detailed cross-references.

The term “emails” includes the entire email string and all attachments found anywhere within the email string. Please refer to paragraph “D.” regarding specific instructions for producing such items.

“Communications” refers to correspondence of any kind, including emails.

“Identify” and “describe” shall have the meaning set forth below according to the context in which the term is used:

When used in reference to an individual, shall mean to state his or her full name, present or last known residence address, business affiliation and business address, and residence and business telephone number;

When used in reference to a corporation, shall mean to state its full name, its state of incorporation, its address and its principal place of business;

When used in reference to any entity other than an individual or corporation, shall mean to state its official name, its organizational form and its address;

When used in reference to a document, shall mean to state the type of document, date, author, addressee, title, its present location, the name and address of its custodian, and the substance of the contents thereof. In lieu of identifying any document, copies thereof may be furnished; and

When used in reference to a communication, shall mean to state the form of the communication (e.g., telephone conversation, letter, telegram, teletype, telecopy, written memorandum, face to face conversation, or any other form), the date of the communication or the dates on which the communication was sent and/or received if not the same, the parties to the communication, the party who initiated it, the substance of the communication, and the present location and the name and address of the custodian if the communication was non-verbal and/or of any written memorialization of the communication.

Respectfully submitted,

THOMPSON & KNIGHT LLP

/s/ James Z. Zhu

Rex D. VanMiddlesworth

State Bar No. 20449400

Benjamin B. Hallmark

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Austin, Texas 78701

(512) 469.6100

(512) 469.6180 (fax)

**ATTORNEYS FOR TEXAS INDUSTRIAL  
ENERGY CONSUMERS**

**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 22<sup>nd</sup> of October, 2020 by facsimile, electronic mail and/or first Class, U.S. Mail, Postage Prepaid.

/s/ James Z. Zhu

James Z. Zhu

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

**TEXAS INDUSTRIAL ENERGY CONSUMERS'**  
**FIRST REQUEST FOR INFORMATION TO SWEPCO**

- TIEC 1-1** Please provide a copy of the following EXCEL workbooks linked to Schedule P-1 SWEPCO TX COS\_Class TY3-2020 Filed with all formulas and links intact:
- a. 12\_Distribution Assets including Location\_SEND File.
  - b. AEPSC Base Labor billed to SWEPCO for Test Year-2020-send to Earlyne.
  - c. MS- Functionalized.
  - d. Prod Alloc SWEPCO Juris SWP TY Mar 2020.
  - e. Tran Alloc SWEPCO Juris SPP TY Mar 2020.
  - f. Weighted Rev Tax Alloc (SWEPCO TX data ye 3-2020 inside city limits).
- TIEC 1-2** Please provide a copy of all EXCEL workbooks with all formulas intact that are linked to the EXCEL workbooks requested in TIEC 1-1.
- TIEC 1-3** Referring to Schedule P-1 SWEPCO TX COS\_Class TY3-2020 Filed:
- a. Please provide the workpapers supporting the DEMTRANS and SPPDEMAND allocation factors.
  - b. Please provide the workpapers showing the derivation of the coincident peak, class peak, and non-coincident peak demands at the generation level, including the quantities at the meter and the applicable loss factors.
- TIEC 1-4** Please provide a copy of the most recent loss study.

*The following RFIs pertain to the Direct Testimony of Jennifer L. Jackson:*

- TIEC 1-5** Please provide a "live" EXCEL version of Exhibit JLJ-1.
- TIEC 1-6** Please provide a copy of all EXCEL workbooks linked to Exhibit JLJ-1 in "live" format.
- TIEC 1-7** Referring to page 23, lines 4-10, please provide all documents supporting the assertion that SPP requires load of customers having self-generation that is synchronized with the SWEPCO transmission system to be included in SWEPCO's load ratio share allocation by the SPP.

- TIEC 1-8** Please provide workpapers supporting the proposed \$2.20 per CP-kW charge for synchronized self-generation load.
- TIEC 1-9** Please provide a copy of SWEPCO's most recent avoided cost analysis.
- TIEC 1-10** Please provide workpapers supporting the definitions of On-Peak and Off-Peak hours in the proposed REV and Time-of-Use pilot tariffs.
- TIEC 1-11** Please state the number of Texas retail customers that currently have time-of-use meters by customer class.
- TIEC 1-12** Please provide the workpapers supporting the proposed Rate Case Expense rider.
- TIEC 1-13** Regarding the Capacity Charge for Highly Fluctuating Loads:
- a. Please provide the workpapers supporting the continuation of the current charge.
  - b. Please provide the workpapers supporting the proposed \$2.081.60 per month charge.
  - c. Please explain how SWEPCO determines when customers operating equipment with highly fluctuating, intermittent, or abnormal characteristics make it necessary for the Company to install special facilities to serve the Customer or to prevent disturbances to the service to other Customers.
  - d. Please identify the number of customers, the associated rate schedule, and the billed revenues for whom the Capacity Charge for Highly Fluctuating Loads currently applies.

*The following RFIs pertain to the Direct Testimony of John O. Aaron:*

- TIEC 1-14** Referring to page 15:
- a. Please provide all information that SWEPCO provided to SPP in determining the Zone 1 and SWEPCO monthly load ratio shares for calendar years 2019 and 2020 and the supporting workpapers.
  - b. Please provide workpapers showing the derivation of self-served load from retail behind-the-meter generation used in determining the Zone 1 and SWEPCO monthly load ratio shares for calendar years 2019 and 2020 and all supporting workpapers.
  - c. Has SWEPCO proposed a similar adjustment as the one described in subpart b for self-served load by its wholesale transmission customers? Explain your response.
  - d. Please confirm that the applicable SPP monthly load ratio shares in 2020 are based on loads that occurred in 2019. If not confirm, please explain why not.
  - e. Please provide the Zone 1 and SWEPCO monthly load ratio shares since 2015.



- TIEC 1-15** Referring to page 18:
- a. Please provide a detailed breakdown of the proposed test-year Transmission-Related Other Electric Revenues. In responding, please further separate the SPP-related revenues by service schedule.
  - b. Please provide all workpapers showing the derivation of SPP-OATT expenses allocated to SWEPCO for the test year and calendar year 2019.

*The following RFIs pertain to the Direct Testimony of Thomas P. Brice:*

- TIEC 1-16** Referring to page 6:
- a. Please provide all documents surrounding the settlement(s) in which SWEPCO agreed to retire the Dolet Hills Power Station.
  - b. Please provide a schedule of the net book value of SWEPCO's share of the environmental investments at the Dolet Hills Power Station that SWEPCO sought and received approval from the PUCT in Docket No. 46449.
  - c. Please confirm that in Docket No. 46449, Dolet Hills was projected to retire in the year 2046. If not confirm, please state why not.

**TIEC 1-17** Please provide all presentations, analyses, and documents supporting the decision to retire the Dolet Hills Power Station by the end of 2021.

**TIEC 1-18** Please provide all internal communications regarding the decision to retire the Dolet Hills Power Station by the end of 2021.

**TIEC 1-19** Please state SWEPCO's current estimate of the retirement date of the Dolet Hills Power Station.

**TIEC 1-20** Referring to page 7, lines 7-11, please provide supporting documents that GAAP and standard regulatory practices requiring that a large asset must be fully depreciated at the end of its economic life.

**TIEC 1-21** Referring to page 8, lines 1-7, please identify the alternative amortization periods considered by SWEPCO and the reasons for choosing a four-year period to amortize the remaining Dolet Hills investment.

- TIEC 1-22** Referring to page 12:
- a. Please state the amount of Hurricane Laura restoration costs that SWEPCO is proposing to charge against the proposed self-insurance reserve.
  - b. Please provide a detailed breakdown of the Hurricane Laura restoration costs by FERC account with labor and materials expenses separately stated.

**TIEC 1-23** Referring to page 13, lines 1-5:

- a. Please state the regulatory authority and past Commission precedent applicable to non-ERCOT utilities for establishing a mechanism that would allow SWEPCO to track and seek dollar-for-dollar recovery of all future SPP OATT costs that may vary from the test year expenses.
- b. Please clarify whether SWEPCO's tracking proposal would also apply to all SPP OATT revenues received by SWEPCO.

*The following RFIs pertain to the Direct Testimony of Michael A. Baird:*

**TIEC 1-24** Referring page 23:

- a. Please provide workpapers showing the adjustments to accumulated depreciation for the retirement of Dolet Hills Power Station.
- b. Please state the following test year expenses related to the Dolet Hills Power Station:
  - i. Operation and maintenance expenses by FERC account;
  - ii. Property taxes; and
  - iii. Insurance.

**TIEC 1-25** Please provide a schedule of rate case expenses incurred in each of the following matters that SWEPCO is seeking to recover in this case:

- a. Docket No. 49042.
- b. Docket No. 46449.
- c. Docket No. 40443.

**TIEC 1-26** Please provide all source documents for WP B-1.5.17 (Dolet ADIT Off-Set), including any referenced "live" EXCEL workbooks.

**TIEC 1-27** Please provide a schedule showing the monthly ancillary service charges for the total SWEPCO system and for Texas for the test year.

*The following RFIs pertain to the Direct Testimony of Gregory S. Wilson:*

**TIEC 1-28** Please explain how the information presented in Exhibit GSW-3 was used in determining the target storm reserve and the expected annual losses.

**TIEC 1-29** Please quantify the recommended target storm reserve and the expected annual losses change assuming the actual storm damage from the year 2000 had been excluded and provide the supporting workpapers.

*The following RFIs pertain to the Direct Testimony of Renee V. Hawkins:*

- TIEC 1-30** Please provide copies of all credit reports published by Moody's, Standard and Poor's (S&P), and Fitch for SWEPCO and its parent company over the last five years.
- TIEC 1-31** Please provide complete copies of all recent credit reports issued by Moody's, S&P, and Fitch that discuss the currently regulated utility industry.
- TIEC 1-32** Please provide copies of all correspondence, presentations and all other materials that SWEPCO and its parent company provided to credit and equity analysts over the last two years.
- TIEC 1-33** Please provide the most recent senior secured, unsecured and corporate credit rating of SWEPCO assigned by Moody's, S&P, and Fitch.
- TIEC 1-34** Please provide SWEPCO's S&P business and financial risk profiles and identify the S&P volatility benchmark tables (medial, low) used for SWEPCO and its parent company.
- TIEC 1-35** Please identify the benchmark risk assessment for SWEPCO and its parent company from Moody's and Fitch.
- TIEC 1-36** Please provide in electronic format, with all formulas and links intact, the calculations of SWEPCO's credit metric calculations relied on by Moody's when determining SWEPCO's credit ratings in its most recent credit report.

*The following RFI pertains to the Direct Testimony of Dylan W. D'Ascendis:*

- TIEC 1-37** Please provide the following:
- a. EXCEL workbooks of all exhibits with all links and formulas intact.
  - b. All supporting workpapers for Mr. D'Ascendis' exhibits in EXCEL format with all links and formulas intact.