



Control Number: 51415



Item Number: 16

Addendum StartPage: 0



PUC DOCKET NO. 51415

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

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**PUBLIC UTILITY COMMISSION
OF TEXAS**

**CITIES ADVOCATING REASONABLE DEREGULATION'S
FIRST SET OF REQUESTS FOR INFORMATION TO
SOUTHWESTERN ELECTRIC POWER COMPANY**

Cities Advocating Reasonable Deregulation's ("CARD") First Set of Requests for Information ("RFIs") to Southwestern Electric Power Company ("SWEPCO") is hereby filed in this docket. Responses to the RFIs set forth on Exhibit A should be served on Alfred R. Herrera, Herrera Law & Associates, PLLC at 4524 Burnet Road, Austin, Texas 78756, within twenty (20) working days of service hereof or no later than **November 20, 2020**, or as modified by Order. Exhibit A is attached hereto and incorporated herein for all purposes.

DEFINITIONS

1. "SWEPCO," the "Company," and "Applicant" refer to Southwestern Electric Power Company and its affiliates.
2. "You," "yours," and "your" refer to SWEPCO (as defined above), including its directors, officers, employees, consultants, agents and attorneys.
3. "Document" and "documents" mean any written, recorded, filmed, or graphic matter, whether produced, reproduced, or on paper, cards, tapes, film, electronic facsimile, computer storage device of any other media, including, but not limited to, 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 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.
4. The term "communication" includes all verbal and written communications (including written records of verbal communications) of every kind, including but not limited to, telephone calls, conferences, letters and all memoranda or other documents concerning the requested item. Where communications are not in writing, provide copies of all memoranda and documents and describe in full the substance of the communication to the extent that substance is not reflected in the memoranda and documents provided and to the extent it is within the knowledge of SWEPCO.

16

5. "Identification" of a document includes stating (a) the nature of the document (e.g., letter, memorandum, corporate minutes), (b) the date, if any, appearing thereon, (c) the date, if known, on which the document was prepared, (d) the title of the document, (e) the general subject matter of the document, (f) the number of pages comprising the document, (g) the identity of each person who signed or initialed the document, (h) the identity of each person to whom the document was addressed, (i) the identity of each person who received the document or reviewed it, (j) the location of the document, and (k) the identity of each person having custody of, or control over, the document. Identification of a document includes identifying all documents known or believed to exist, whether or not in the custody of SWEPCO or in the custody of its attorneys or other representatives or agents.
6. "Identification" of a person includes stating his or her full name, his or her most recent known business address and telephone number, his or her present position, and his or her prior connection or association with any party to this proceeding.
7. "Person" refers to, without limiting the generality of its meaning, every natural person, corporate entity, partnership, association (whether formally organized or ad hoc), joint venture, unit operation, cooperative, municipality, commission, governmental body or agency.
8. Capitalized terms not otherwise defined herein shall have the meaning attributed to them in the referenced testimony.

INSTRUCTIONS

1. If any RFI appears confusing, please request clarification from the undersigned counsel.
2. In providing your responses, please start each response on a separate page and type, at the top of the page, the RFI that is being answered.
3. As part of the response to each RFI, please state, at the bottom of the answer, the name and job position of each person who participated in any way, other than providing clerical assistance, in the preparing of the answer. If the RFI has sub-parts, please identify the person or persons by sub-part. Please also state the name of the witness in this docket who will sponsor the answer to the RFI and who can vouch for the truth of the answer. If the RFI has sub-parts, please identify the witness or witnesses by sub-part.
4. Rather than waiting to provide all of the responses at the same time, please provide individual responses as each becomes available.
5. If SWEPCO considers any RFI to be unduly burdensome, or if the response would require the production of a voluminous amount of material, please call the undersigned counsel as soon as possible in order to discuss the situation and to try to resolve the problem. Likewise, if SWEPCO objects to any of the RFIs on the grounds that the RFI seeks proprietary information, or on any other grounds, please call the undersigned counsel as soon as possible.

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, recipients of copies, subject matter of the document, and the basis upon which such privilege is claimed.
7. These requests shall be deemed continuing so as to require further and supplemental responses if SWEPCO receives or generates additional information within the scope of these requests between the time of the original response and the time of the hearings.

Respectfully submitted,

HERRERA LAW & ASSOCIATES, PLLC

PO Box 302799

Austin, Texas 78703

4524 Burnet Road

Austin, Texas 78756

(512) 474-1492 (voice)

(512) 474-2507 (fax)

By: /s/Sergio Herrera

Alfred R. Herrera

State Bar No. 09529600

aherrera@herreralawpllc.com

Brennan J. Foley

State Bar No. 24055490

bfoley@herreralawpllc.com

Sergio E. Herrera

State Bar No. 24109999

sherrera@herreralawpllc.com

service@herreralawpllc.com

**ATTORNEYS FOR CITIES ADVOCATING
REASONABLE DEREGULATION**

CERTIFICATE OF SERVICE

I certify that I have served a copy of *CARD's First Set of Requests for Information to SWEPCO* upon all known parties of record by electronic email, fax and/or first class mail on this the 23rd day of October, 2020.

By: /s/Leslie Lindsey

Leslie Lindsey

EXHIBIT A

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

**CITIES ADVOCATING REASONABLE DEREGULATION'S
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SOUTHWESTERN ELECTRIC POWER COMPANY**

- 1-1. Identify and provide documentation of any disallowances of SWEPCO's purchased power capacity costs incurred during any portion of the test year at issue in this case which have been ordered in other regulatory jurisdictions.
- 1-2. Provide any operating agreements that governed the operations and dispatch of SWEPCO's generating units during the test year.
- 1-3. Provide monthly reports addressing the volume and costs of capacity and energy purchased by SWEPCO from affiliates during the test year period.
- 1-4. Provide monthly reports addressing the volume and costs of capacity and energy sold by SWEPCO to affiliates during the test year period.
- 1-5. Provide the maximum net dependable capacity, commercial operation date, scheduled retirement date, and primary fuel type used for each SWEPCO generating unit.
- 1-6. Provide the start date, end date, duration, root cause and non-fuel O&M costs incurred for each outage of SWEPCO generating units lasting more than 100 hours during the test year period.
- 1-7. Provide the total annual forced outage hours and planned outage hours for each SWEPCO generating unit for the test year and each of the last four calendar years.
- 1-8. Provide copies of all SWEPCO purchased power agreements that included non-fuel or capacity charges that were in effect during the test year period.
- 1-9. Provide copies of all invoices for SWEPCO purchased power that included non-fuel or capacity charges that are included in the test year period purchased power charges.
- 1-10. Provide copies of each SWEPCO wholesale power sale agreement that was in effect during the test year period and identify each such agreement that was not a full requirements sale with cost-based regulated charges.

- 1-11. Provide the total system net dependable generating capability (MW), firm purchased capacity (MW) and firm native system peak hour demand (MW) for the SWEPCO system for each month of the test year.
- 1-12. Provide a copy of SWEPCO's integrated resource plan report that governed capacity planning decisions during the test year period.
- 1-13. Identify planned environmental compliance projects for each SWEPCO generating plant, the specific regulations addressed by each project, and cost/benefit analyses supporting the selection of each compliance project.
- 1-14. Provide the test year requested purchased capacity costs, associated purchased capacity (MW) levels, contract start date and termination date, for each purchased capacity contract reflected in base rates in this case.
- 1-15. Provide non-fuel production O&M expenses for each SWEPCO power plant by FERC account for each of the last four calendar years, the test year, and as requested in rates in this case.
- 1-16. Provide annual capital expenditures at each SWEPCO power plant for each of the last four calendar years, the test year, and as requested in rates for the first time in this case.
- 1-17. Provide project descriptions and cost/benefit summaries for each power plant, distribution plant and transmission plant capital project having a cost in excess of \$2 million which is being requested in rates for the first time in this case.
- 1-18. Provide SWEPCO's transmission O&M expenses by FERC account for each of the last four calendar years, the test year, and as requested in rates in this case.
- 1-19. Provide total SWEPCO transmission capital expenditures for each of the last four calendar years, the test year, and as requested in rates for the first time in this case.
- 1-20. Provide SWEPCO's distribution O&M expenses by FERC account for each of the last four calendar years, the test year, and as requested in rates in this case.
- 1-21. Provide total SWEPCO distribution capital expenditures for each of the last four calendar years, the test year, and as requested in rates for the first time in this case.
- 1-22. Provide SWEPCO's annual SAIDI and SAIFI for the Company's Texas service area with and without major storms for each of the last four years and for the test year in this case.
- 1-23. Provide SWEPCO's total system annual SAIDI and SAIFI with and without major storms for each of the last four years and for the test year in this case.
- 1-24. Identify the docket number, jurisdiction and final order date of each base rate case filed by SWEPCO in the last three calendar years.