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SOAH DOCKET NO. 473-21-0538  
PUC DOCKET NO. 51415

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

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

Cities Advocating Reasonable Deregulation's ("CARD") Sixth 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) calendar days of service hereof or no later than **February 18, 2021**, 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.

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,

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**ATTORNEYS FOR CITIES ADVOCATING  
REASONABLE DEREGULATION**

#### CERTIFICATE OF SERVICE

I hereby certify that on this 29th day of January, 2021, a true and correct copy of CARD's *Sixth Set of Requests for Information to SWEPCO* was served upon all parties of record via electronic mail, in accordance with the Order Suspending Rules, issued in Project No. 50664.

By: /s/Leslie Lindsey

Leslie Lindsey

**EXHIBIT A**

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SOUTHWESTERN ELECTRIC POWER COMPANY**

- 6-1. Please provide all property data utilized in the depreciation study, including, but not limited to, additions, retirements, transfers, sales, adjustments, cost of removal, and salvage data.
  - a. Please provide this data by account, placement, and experience year since the date of inception.
  - b. Please provide all survivors for each account as of the study date.
  - c. Please include all transaction codes and a description of each transaction code.
  - d. Please also provide a description of any production unit / group / location codes if applicable.
  - e. This data should allow for the reconstruction of the analysis and calculations performed as part of the depreciation study.
  - f. Please provide this information in Excel format with formulae intact where applicable.
- 6-2. Please provide all workpapers, schedules, tables, and exhibits used in the depreciation study or relied upon in conducting the depreciation study in Excel format with formulae intact where applicable.
- 6-3. Please provide all final observed life tables generated for each account in Excel format.
- 6-4. Please provide all remaining life calculations in Excel format.
- 6-5. Please provide the average age of survivors as of the study date for each production plant by account.
- 6-6. Please provide the book reserve (accumulated depreciation) balances for each account as of the depreciation study date.

- 6-7. Please identify and describe any changes in the depreciation system / methodology between the previous depreciation study and the depreciation study filed in this case.
- 6-8. Please provide a schedule showing the currently-approved and proposed retirement dates for production plant.
- 6-9. Please provide a copy of the Company's most recently-filed integrated resource plan; please also provide a copy of the most recently prepared integrated resource plan.
- 6-10. Please provide all notes taken during any meetings with Company personnel regarding the depreciation study. Identify by name and title, all Company personnel who provided the information, and explain the extent of their participation and the information they provided. Please explain how this information affected the depreciation study.
- 6-11. Please identify all plant tours taken in relation to the depreciation study. For each such tour:
  - a. Identify those in attendance and their titles and job descriptions.
  - b. Provide all conversation notes taken during the tour.
  - c. Provide all photographs and images taken during the tour.
  - d. Provide all written materials obtained during the tour.
- 6-12. Please specifically identify and describe any information obtained from any plant tour, field trip, or discussion with Company personnel that would indicate that the average service lives of any life span or mass property would be shorter or longer than what is indicated by the retirement rate described by the Company's plant data.
- 6-13. Please identify and provide copies of Company programs and plans that might substantially affect the remaining lives of any plant assets.
- 6-14. Regarding the placement and experience bands chosen for the analysis of each account, please explain why such bands were chosen and if any other bands were considered for conducting depreciation analysis.
- 6-15. Please provide the updated plant balances to which the approved depreciation rates in this case will be applied.
- 6-16. Please state whether the recorded vintage years of retirement have been modified in the historical data used to conduct the depreciation study. If so, please specifically identify such modifications by account, and provide all justification and support for the same.

- 6-17. Please provide all decommissioning studies relied upon for support of any terminal net salvage requested in this case, and provide a schedule showing the calculations of how the estimated decommissioning costs affected the proposed production net salvage rates.
- 6-18. Referring to the Generation Arrangement Report, please describe and use mathematical formulas to show how the amounts in the “Net Plant Ratio,” “Computed Net Plant,” and “Accrual” Columns were calculated. Please use one account as an example if all accounts were calculated in the same manner.
- 6-19. Referring to Schedule I – Calculation of Depreciation Rates by the Remaining Life Method, please answer the following questions:
- a. Please describe and provide detailed calculations showing how the Calculated Depreciation Requirement was determined for each account.
  - b. Please describe and provide detailed calculations showing how the Allocated Accumulated Depreciation was determined for each account.
  - c. Please show how the amount in Cells G130, G144, G161, and G177 were determined. If there are adjustments to depreciation parameters in this case (including life and/or net salvage), would it require a corresponding change in the amounts included in these cells?
  - d. Using Account 367 as an example, please provide a revised Schedule I – Calculation of Depreciation Rates by the Remaining Life Method, assuming a 55-R2 Iowa curve and -10% net salvage rate. Please provide all supporting worksheets, calculations and formulas.