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

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

BEFORE THE  
PUBLIC UTILITY COMMISSION  
OF TEXAS

**NUCOR STEEL LONGVIEW, LLC's THIRD REQUEST  
FOR INFORMATION TO SWEPCO**

COMES NOW Nucor Steel Longview, LLC ("Nucor"), a division of Nucor Corporation, pursuant to Section 22.144 of the Procedural Rules of the Public Utility Commission of Texas and the procedural order in this proceeding, and requests that Southwestern Electric Power Company ("SWEPCO") answer the following questions under oath. Please present your response in accordance with the requirements of P.U.C. PROC. R. § 22.144(c)(2). State the name of the witness in this matter who will sponsor the answer to the question and can vouch for the truth of the answer. The answer should be filed under oath, or the responding party should stipulate in writing that the answer can be treated by all parties as if filed under oath. The response is requested within twenty (20) calendar days or in compliance with any scheduling order entered in this proceeding. SWEPCO is under a continuing obligation to supplement or amend as needed in accordance with P.U.C. PROC. R. § 22.144.

These RFIs are intended to not be duplicative of other discovery propounded by any other party, therefore to the extent any information requested herein is found in responses to other discovery, SWEPCO's response should so state rather than producing additional responses. If any information sought herein has already been filed in the Docket, then reference to the location of that information is a sufficient response.

These requests are not intended to seek, and should be read as expressly excluding, privileged information or documents. Should any information be withheld from a response, please state in that response that you are withholding information or materials and the privilege(s)

asserted.

Provide your response to the undersigned authorized representatives at the address and email listed below.

Respectfully submitted,

**STONE MATTHEIS XENOPOULOS & BREW, PC**

*/s/ Damon E. Xenopoulos* \_\_\_\_\_

Damon E. Xenopoulos

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**AUTHORIZED REPRESENTATIVES FOR  
NUCOR STEEL LONGVIEW, LLC**

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the above and foregoing document was served via electronic transmission, hand delivery and/or U.S. mail to all parties of record this 1st day of February 2021.

*/s/ Laura W. Baker* \_\_\_\_\_

Laura W. Baker

**NUCOR STEEL LONGVIEW, LLC'S THIRD REQUEST  
FOR INFORMATION TO SOUTHWESTERN ELECTRIC POWER COMPANY**

**Definitions and Instructions**

**A.** “**You**” and “**Your**” refers to Southwestern Electric Power Company (“SWEPCO”), the Petitioner in PUC Docket No. 51415, SOAH Docket No. 473-21-0538.

**B.** “**Southwestern Electric Power Company**” or “**SWEPCO**” or “**the Petitioner**” refers to its officers, employees, agents, representatives, attorneys, and all other natural persons, businesses or legal entities, presently or formerly, acting in concert with, under the direct or indirect control of, or on behalf of SWEPCO.

**C.** “**Nucor Steel Longview, LLC**” or “**Nucor**” refers to its officers, employees, agents, representatives, attorneys, and all other natural persons, businesses or legal entities, presently or formerly, acting in concert with, under the direct or indirect control of, or on behalf of Nucor.

**D.** The term “**Commission**” refers to the Public Utility Commission of Texas, an administrative agency of the State of Texas, and its Staff and Commissioners, natural persons employed by and working for the agency.

**E.** The term “**Staff**” as used herein refers to the natural persons employed by and working for the Public Utility Commission of Texas in any capacity.

**F.** “**Document**” and “**Documents**” are used herein in their broadest sense as set forth in Tex. R. Civ. P. 192.3(b), and specifically include electronic information or magnetic data as described in Rule 196.4. These words mean and include all written, printed, typed, recorded, or graphic matter of every kind and description, both original and copies, and all attachments and appendices. Without limiting the foregoing, the terms “**Document**” and “**Documents**” shall include all agreements, contracts, communications, correspondence, letters, opinion letters, telegrams, telexes, telefaxes, messages, memoranda, records, reports, books, summaries or other records of telephone conversations or interviews, summaries or other records of personal conversations or interviews, minutes, summaries, or other records of meetings and conferences, statements obtained from witnesses, summaries or other records of negotiations, other summaries, diaries, diary entries, calendars, appointment books, time records, instructions, work assignments, forecasts, progress reports, statistical data, statistical statements, financial statements, worksheets, workpapers, drafts, graphs, charts, tables, accounts, analytical records, consultants’ and experts’ reports, appraisals, bulletins, notes, notices, marginal notations, notebooks, telephone records, bills, statements, records of obligation and expenditure, invoices, lists, journals, printouts, compilations, tabulations, analyses, studies, surveys, expense reports, microfilm, microfiche, tape or disc recordings, sound recordings, video recordings, film, tape, photographs, programs and data compilations from which information can be obtained (including matter used in data processing), and other printed, written, handwritten, typewritten, recorded, stenographic, computer-generated, computer-stored, magnetically-stored, optically-stored, or electronically stored matter and Electronic Information, however produced, prepared, reproduced, disseminated, made or stored in any data source. The words “**Document**” and “**Documents**” also include all copies of documents by whatever means made, except that where a document is produced, identical copies of it that do not contain any

markings, additions, or deletions that are different from the original do not have to be separately produced.

**G.** 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.

**H.** The term “**Communication**” includes, without limitation of its generality, statements, discussions, conversations, speeches, meetings, remarks, questions, answers, panel discussions and symposia, whether written or oral. The term includes, without limitation of its generality, both communications and statements which are face-to-face and those which are transmitted by any media such as intercoms, telephones, television, radio, or computer including electronic information.

**I.** The term “**Electronic Information**” includes, without limitation, the following: databases, data files, program files (*e.g.*, DOC, XLS, WPD files), image files (*e.g.*, JPEG, TIFF, PDF files), email messages and files, voicemail messages and files, instant messaging messages, text messages, temporary files, system-history files, deleted files or emails, backup files and archival files, website files, website information stored in textual, graphical or audio format, cache files, and cookies stored in any Data Sources in SWEPCO’s possession or control.

**J** The term “**Data Sources**” includes, without limitation, mainframe computers, network servers, internet (“web”) servers, computers (including desktop, laptop and handheld computers), hard drives (including portable or temporary hard drives), flash drives (including thumb drives, secure digital cards or other flash memory devices), email servers, handheld devices like personal digital assistants and cell phones or smartphones (*e.g.*, iPhones).

**K.** Pursuant to Rule 196.4 of the Texas Rules of Civil Procedure, Nucor requests that any electronic or magnetic data that is responsive to a request herein be produced in a format that is compatible with Microsoft Word, Excel or similar widely available formats and be produced with your response to these requests. If emails are responsive to these requests, please provide a copy of the entire email string. Attachments to emails should also be provided in native format.

**L.** The terms “**relate**” or “**relating**” to any given subject, when used to specify a document, communication, statement, or correspondence mean any document, communication, statement or correspondence that constitutes, contains, evidences, embodies, reflects, identifies, states, discusses, refers to, deals with, or is in any manner whatsoever pertinent to that subject.

**M.** The term “**identify,**” when used in reference to a natural person means to provide his or her (1) full name and (2) present or last known position or business affiliation, job title, employment address, and telephone number.

**N.** The terms “**identify**” and “**describe,**” when used in reference to facts, an event, or an allegation, means to include: (a) a detailed description of the facts, events, or allegation at issue; (b) the date or dates on which the facts or event occurred, or the time period involved in the events giving rise or relating to the allegation; (c) the name, address, telephone number, and affiliation of all persons involved in the facts, event, or allegation; and (d) the date, author, addressee or recipient, and type of document of any document relating to or concerning the event or allegation.

**O.** The term “**SWEPCO Application**” means the Application of Southwest Electric Power Company for Authority to Change Rate and the Petition and Statement of Intent filed at the Public Utility Commission of Texas on October 14, 2020, PUC Docket No. 51415, and referred to the State Office of Administrative Hearings by PUC Order on October 30, 2020, and subsequently assigned SOAH Docket No. 473-21-0538.

### Requests

- Nucor 3-1 Please refer to Schedule Q-7. For each Commercial and Industrial rate class or subclass listed, provide the following test year information for (1) the five smallest customers in terms of annual test year charges billed, (2) the five largest customers in terms of annual test year charges billed, (3) the average customer in terms of annual test year charges billed, and (4) the median customer in term of annual test year charges billed:
- (a) Monthly Energy (kwh) used,
  - (b) Monthly Metered Peak Demand,
  - (c) Monthly Billing Demand,
  - (d) Monthly Base Rate Charges,
  - (e) Monthly Total Charges Billed,
  - (f) Voltage Level of Service, and
  - (g) Any available Interval Demand Data.
- Provide the responses to this RFI in a working electronic file, preferably in Excel. In addition, Nucor is not requesting the name or identity of any customer, so label customers as Customer A, Customer B, etc.
- Nucor 3-2 Please compare Schedule Q-7 with SWEPCO’s Schedule Q-7 filed in Docket No. 46449. Explain why SWEPCO is proposing different major customer classes or rate class groupings in this case as compared to Docket No. 46449 for purposes of developing SWEPCO’s proposed revenue distribution. Provide copies of all supporting studies, documents and workpapers.
- Nucor 3-3 Please provide in a usable electronic file, the customer data files used to prepare Schedule Q-5.1.
- Nucor 3-4 Please refer to page 6 of the direct testimony of SWEPCO witness Jennifer Jackson. Provide working Excel files, with all formulas and links intact, of Exhibit JJJ-1.
- Nucor 3-5 Please refer to page 7, lines 1 and 2, of the direct testimony of SWEPCO witness Jennifer Jackson. Explain what is meant by the sentence, “Customers are grouped together by similar usage patterns.” Include in the explanation which usage patterns were considered and discuss how “similar” was determined. Also, state what these customer groups are used for, e.g., the rate classes.
- Nucor 3-6 Please refer to page 7, line 1, of the direct testimony of SWEPCO witness Jennifer

Jackson. Please define the phrase “use of the system” as used in the sentence. Also, explain how “use of the system” was used to determine the rate schedule customer classes.

- Nucor 3-7 Please refer to page 6, line 20, of the direct testimony of SWEPCO witness Jennifer Jackson. Explain how “energy usage level” was used to determine the rate schedule customer classes.
- Nucor 3-8 Please refer to the sentence on page 7, lines 8 through 11, of the direct testimony of SWEPCO witness Jennifer Jackson. As used in that sentence, are the phrases “rate schedule,” “customer class” and “class of customers,” synonymous? If not, explain and define each phrase as used in that sentence.
- Nucor 3-9 Please refer to the sentence on page 7, lines 5 through 8, of the direct testimony of SWEPCO witness Jennifer Jackson. Explain why SWEPCO does not use seasonal demand charges to recover costs that vary with the capacity requirements of SWEPCO’s customers.
- Nucor 3-10 Please refer to page 8, lines 2 through 7, of the direct testimony of SWEPCO witness Jennifer Jackson. Please explain why SWEPCO does not include a rate design goal to move all rate classes closer to an equalized rate of return.
- Nucor 3-11 Please refer to page 10, lines 16 through 21, of the direct testimony of SWEPCO witness Jennifer Jackson. Please describe and define the phrase “similarly-situated customers” and explain how SWEPCO determined which rate classes had similarly-situated customers.
- Nucor 3-12 Please refer to page 10, line 22, to page 11, line 2, of the direct testimony of SWEPCO witness Jennifer Jackson. Please provide a copy of all SWEPCO cost of service studies filed at the Commission that support the claim that the class cost-of-service study results for rate classes with few customers had unusual outcomes. In addition, describe what is meant by unusual outcomes. Also, identify in each class cost-of-service study provided to support this claim the unusual outcomes referred to in that sentence.
- Nucor 3-13 Please refer to page 11, lines 4 through 9, of the direct testimony of SWEPCO witness Jennifer Jackson. Please explain how grouping the Commercial and Industrial customer classes into one large rate class facilitates “sustainable migration” among the customer classes within a family of rate options. Provide a copy of all studies, analyses, and other documents which support this claim of sustainable migration.
- Nucor 3-14 Please explain why SWEPCO believes it is important for the proposed rate design to facilitate sustainable migration among customer classes within a family of rate options. In addition, for the one large Commercial and Industrial customer class SWEPCO uses for revenue distribution purposes, identify for each rate class the other rate classes that customers might migrate to.
- Nucor 3-15 Please identify all rate classes where the proposed rates will recover costs that



exceed their allocated cost of service. For the customers in each rate class identified, also list the rate classes that those customers can migrate to.

- Nucor 3-16 Please provide a working Excel file similar to SWEPCO Exhibit JJJ-1 except using Docket No. 46449 data and the approved rate revenues in that docket instead of the proposed revenues.
- Nucor 3-17 Please identify all prior SWEPCO rate cases in which the rate classes LP Primary and Metal Melting Transmission were paying rates that were higher than their allocated cost of service.
- Nucor 3-18 Please provide working Excel files of the following Schedules: P-1.1 through P-1.5, P-2, P-3, P-4, P-5, P-6, P-7, P-10, and P-11.
- Nucor 3-19 Please refer to Schedule P-1, tabs Dist Sec and Dist Pri. For each distribution plant account, please provide all linked files, workpapers, analyses, computer files, documents and other supporting information used to determine the plant amounts assigned as primary related and secondary related.
- Nucor 3-20 Please refer to Schedule P-6, page 8 of 12. Please explain why and what distribution secondary costs are allocated to the LP Primary rate class. Also, explain why and what distribution primary and distribution secondary costs are allocated to the Metal Melting Transmission customer class.
- Nucor 3-21 Please refer to Schedule P-6, page 9 of 12. Please explain why the Gen Energy and Gen Demand costs for the LP Primary rate class are higher than the LP Secondary rate class. Please explain why and what Dist Sec costs are allocated to the LP Primary rate class. Please explain why the Tran Demand costs for the Oil Field rate class are negative. Also, confirm that the amounts shown in Metal Melting Transmission column are correct.
- Nucor 3-22 On a continuing basis, identify and provide copies of all substantive information (excluding information filed with the Commission) provided by SWEPCO on or after October 14, 2020 to any party to this proceeding regarding SWEPCO's application and/or other documents comprising SWEPCO's request in this case.
- Nucor 3-23 As used in the direct testimony of SWEPCO witness Jennifer Jackson, define and describe the following phrases:
- (a) Customer class,
  - (b) Rate class,
  - (c) Groups of customers,
  - (d) Major classes, and
  - (e) Class.
- Nucor 3-24 On a continuing basis, identify and provide copies of all substantive information (excluding information filed with the Commission) provided by SWEPCO on or after October 14, 2020 to any party to this proceeding regarding SWEPCO's application and/or other documents comprising SWEPCO's request in this case.