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SOAH DOCKET NO. 473-21-0538

PUC DOCKET NO. 51415 2021 FEB -8 PM 1:17

APPLICATION OF SOUTHWESTERN  
ELECTRIC POWER COMPANY FOR  
AUTHORITY TO CHANGE RATES

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§

PUBLIC UTILITY COMMISSION  
OF TEXAS

**COMMISSION STAFF'S TWELFTH REQUEST FOR INFORMATION  
TO SOUTHWESTERN ELECTRIC POWER COMPANY  
QUESTION NOS. STAFF 12-1 THROUGH 12-8**

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: February 8, 2021

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 February 8, 2021, in accordance with the Order Suspending Rules, issued in Project No. 50664.

/s/ Robert Dakota Parish  
Robert Dakota Parish

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**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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- Staff 12-1** Refer to the response to OPUC 1-18 which states in part, “The only substantial change to the annual incentive plans since the last base case was a temporary (one-year only) elimination of the 2020 STI safety, compliance and strategic initiative components of the 2020 funding measures in favor of 100% AEP Operating EPS due to the uncertain economic impact of COVID-19.” Please explain whether this change in funding measure has been continued for 2021, has reverted back to the pre-2020 funding measure, or has changed to a different funding measure. If It has changed to a different funding measure, please provide a detailed explanation.
- Staff 12-2** Refer to the response to OPUC 1-21, Attachment 1. For each measure shown for calendar years 2019 and 2020, identify each measure SWEPCO considered to be a financial measure for purposes of its adjustment to remove financial based incentive compensation. For any measure that directly impacts the income statement that SWEPCO did not include as a financial measure for purposes of its adjustment, please provide a detailed explanation and justification for why not.
- Staff 12-3** Refer to the response to CARD 4-24, Attachment 1. For each vendor listed, please provide the FERC account where each amount is recorded in the test year end trial balance at Schedule A-4. Please also provide the amount by FERC account for each vendor that is removed in adjustment A-3.6 (misc. riders) and A-3.19 (regulatory expense) and where the removal of each amount can be found in the workpapers associated with both of those adjustments.
- Staff 12-4** Refer to the response to CARD 4-24, Attachment 2. For each vendor listed, please provide the FERC account where each amount is recorded in the test year end trial balance at Schedule A-4. Please also provide the amount by FERC account for each vendor that is removed in adjustment A-3.18 (affiliate adjustment).and where the removal of each amount can be found in the workpapers associated with that adjustment.
- Staff 12-5** Refer to the response to Staff 5-47, Attachment 3. Please provide the number of distribution cabinets installed during the test year and the expense amount by FERC account included in SWEPCO’s requested cost of service.
- Staff 12-6** Refer to the response to Staff 5-47, Attachment 4. Please provide the number of pedestals installed during the test year and the expense amount by FERC account included in SWEPCO’s requested cost of service.

**Staff 12-7** Refer to the response to Staff 5-47, Attachment 2. Please explain why the impact of the accounting change to the restated operating income for 2017 and 2016 for Dolet Hills was a significant increase while the impact to the other AEP entities was a small decrease.

**Staff 12-8** Please provide a detailed explanation of what will happen to owned and leased railroad cars upon the retirements of the Dolet Hills and Pirkey plants. Please also provide the amounts by FERC account related to railroad cars, separately for each plant, included in SWEPCO's requested cost of service (rate base, O&M, depreciation, return, ad valorem taxes, insurance, etc.) that are not included in the responses to OPUC 5-7 or Staff 9-2.