



Control Number: 51415



Item Number: 230

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

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

Cities Advocating Reasonable Deregulation's ("CARD") Ninth 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 **March 29, 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.

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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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By: /s/ Brennan Foley

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**ATTORNEYS FOR CITIES ADVOCATING
REASONABLE DEREGULATION**

CERTIFICATE OF SERVICE

I hereby certify that on this 8th day of March, 2021, a true and correct copy of CARD's *Ninth 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

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

**APPLICATION OF SOUTHWESTERN § BEFORE THE STATE OFFICE
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- 9-1. Reference SWEPCO's response to CARD 1-15, please provide workpapers supporting the proposed adjustments to Test Year non-fuel O&M, rate base, depreciation, taxes and other associated revenue requirements for the referenced retirements at the Knox Lee, Lone Star and Lieberman plants.
- 9-2. Reference SWEPCO's response to CARD 1-15, please provide the retirement date, age at retirement, net dependable capacity, and net book value for each of the referenced retirements at the Knox Lee, Lone Star and Lieberman plants.
- 9-3. Reference SWEPCO's response to CARD 1-15, please provide any economic analysis or other assessment supporting the referenced retirements at the Knox Lee, Lone Star and Lieberman plants.
- 9-4. Reference SWEPCO's response to CARD 1-17, Attachment 2, Project ARSCP6A17, please provide a copy of the Siemens LTSA and a detailed description of the services provided for the referenced major inspection outage.
- 9-5. Reference SWEPCO's response to CARD 1-17, Attachment 2, Project ARSCP6A17, please provide the completion date and amount included in rate base in this case for this project along with any amount included in requested O&M expense for this outage.
- 9-6. Reference SWEPCO's response to CARD 1-17, Attachment 2, Project ARSCP6A17, please provide a breakdown of the total final project costs incurred for this project and identify the portion of total project costs billed by SWEPCO or AEP employees, and the amount charged by Siemens.
- 9-7. Reference SWEPCO's response to CARD 1-17, Attachment 2, Project WSH00DFGD, please provide the in-service date and amount included in rate base in this case for this project.
- 9-8. Reference SWEPCO's response to CARD 1-17, Attachment 2, Project WSH00DFGD, please provide the final cost for this project and explain the reasons for any increase from the Total Approved Project Cost provided on the Capital Program Approval Requisition.

- 9-9. Reference SWEPCO's response to CARD 1-17, Attachment 2, Project WSH00DFGD, please provide a breakdown of the total costs incurred for this project, and identify the portion of total project costs billed by SWEPCO or AEP employees, and the amount charged by contractors.
- 9-10. Reference SWEPCO's response to CARD 1-17, Attachment 2, Project WSH00DFGD, please provide the cost/benefit analysis supporting this project, along with the gas price forecast, assumed remaining life of the Welsh units, and date of the analysis.
- 9-11. Reference SWEPCO's response to CARD 1-17, Attachment 2, Project WSH00DFGD, please provide any cost/benefit analyses conducted to re-evaluate this project considering changes to natural gas prices and SPP market prices from the levels assumed in the original analysis supporting the project.
- 9-12. Reference SWEPCO's response to CARD 1-17, Attachment 4, please provide the in-service date and total capital cost requested in rate base in this case for each of the listed transmission capital programs (or Projects).
- 9-13. Reference SWEPCO's response to CARD 1-17, Attachment 4, please identify each of the listed transmission capital programs (or Projects) that were mandated and/or approved by SPP.
- 9-14. Reference SWEPCO's response to CARD 1-17, Attachment 4, please provide the original approved cost and final cost at completion of each of the listed transmission capital programs (or Projects).
- 9-15. Reference SWEPCO's response to CARD 1-17, Attachment 4, please identify each of the listed transmission capital programs (or Projects) whose costs are funded by other members of SPP, and provide the adjustments proposed in this case to reflect such third-party funding for each project.
- 9-16. Reference SWEPCO's response to CARD 1-17, Attachment 4, please identify each of the listed transmission capital programs (or Projects) that have been approved by the FERC and provide copies of the FERC orders that approved such projects.
- 9-17. Reference SWEPCO's response to CARD 1-17, Attachment 4, page 1, SWEPCO Line Rebuild Program, please provide the in-service dates and total capital cost requested in rate base in this case for each of the listed rebuilt lines included in this program.
- 9-18. Reference SWEPCO's response to CARD 1-17, Attachment 4, page 1, SWEPCO Line Rebuild Program, please provide the cost/benefit analyses and other information provided to Company management to support final approval of each of the listed rebuilt lines listed in this program.
- 9-19. Reference SWEPCO's response to CARD 1-17, Attachment 4, page 1, SWEPCO Line Rebuild Program, please provide the annual SAIDI, SAIFI and customer minutes interrupted for each of the listed rebuilt lines in this program for each of the last ten calendar years.

- 9-20. Provide SWEPCO's annual system SAIDI and SAIFI due to transmission line outages, including major storm events, for each of the last ten calendar years.
- 9-21. Provide SWEPCO's annual system SAIDI and SAIFI due to transmission line outages, excluding major storm events, for each of the last ten calendar years.
- 9-22. Provide SWEPCO's annual system customer minutes interrupted due to transmission line outages, including major storm events, for each of the last ten calendar years.
- 9-23. Provide SWEPCO's annual system customer minutes interrupted due to transmission line outages, excluding major storm events, for each of the last ten calendar years.