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

PUBLIC UTILITY  
FILING CLERK  
COMMISSION OF TEXAS

**EAST TEXAS SALT WATER DISPOSAL COMPANY'S FOURTH REQUEST FOR INFORMATION TO SOUTHWESTERN ELECTRIC POWER COMPANY**

Pursuant to 16 Texas Administrative Code ("TAC") § 22.144, East Texas Salt Water Disposal Company ("ETSWD") submits this Fourth Request for Information to Southwestern Electric Power Company ("SWEPCO") attached as Exhibit A, ETSWD requests that SWEPCO provide answers to the request for information under oath as required by 16 TAC § 22.144(c)(2)(F) within the timeframe specified in the procedural schedule in this proceeding, or within 20 days pursuant to 16 TAC § 22.144(c)(1) if a procedural schedule has not been adopted. ETSWD further requests that SWEPCO provide an answer to the questions and sub-questions in the order listed below with sufficient detailed information to provide a complete and accurate answer to each question and sub-question.

**Definitions**

1. "SWEPCO," the "Company," "Applicant," "You," and "Your" refer to Southwestern Electric Power Company and its affiliates, subsidiaries, 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" and "documents" include any written, recorded, filmed, or graphic matter, whether produced, reproduced, or on paper, cards, tape, film, electronic facsimile, computer storage device, or any other media, including, but not limited to, electronic mail (e-mail), 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, summaries of interviews, reports of consultants, appraisals,

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forecasts, tape recordings, or any form of recording that is capable of being transcribed into written form.

### **Instructions**

1. The Definitions, Instructions, and Claim of Privilege sections set forth in this request for information apply to these questions.
2. In providing an answer to each question, please furnish all of the information that is in your possession, custody, or control, as defined by Texas Rules of Civil Procedure (Tex. R. Civ. Proc.) 192.7(b), including information in the possession, custody, or control of your affiliates, subsidiaries, and any person acting or purporting to act on their behalf, including without limitation, attorneys, agents, advisors, investigators, representatives, employees, or other persons.
3. Please answer each question based upon your knowledge, information, or belief, and state whether each answer is based upon your knowledge, information, or belief.
4. If you have possession, custody, or control, as defined by Tex. R. Civ. Proc. 192.7(b), of an original requested document, please produce the original requested document or a complete copy of the original requested document and all copies that are different in any way from the original requested document, whether by interlineation, receipt stamp, or notation.
5. If you do not have possession, custody, or control of an original requested document, please produce copies of the document, however made, in your possession, custody, or control. If any requested document is not in your possession, custody, or control, please explain why the document is not in your possession, custody, or control and provide the current location and custodian of the requested document or any copy, summary, or other form of the requested document thereof.
6. If there is any confusion about a question, please contact the undersigned counsel for clarification.
7. In providing your response to a question, please start each response on a separate page and type, at the top of the page, the question that is being answered by the response.

8. As part of the response to each question, please state, at the bottom of the answer to the question, the name and job position of each person(s) who participated in any way, other than by providing clerical assistance, in the preparation of the answer to the question. If the question has sub-parts, please identify each person(s) by name and job position that participated in any way, other than by providing clerical assistance, in the preparation of the answer for each sub-part of the question.

9. Please state the name of the witness in this docket who will sponsor the answer to the question and/or sub-part of the question and who will swear to the truthfulness of the answer to the question and/or sub-part of the question.

10. Please provide individual responses to questions as each response becomes available, rather than waiting to provide all of the responses to the questions at the same time.

11. These questions are continuing in nature. If there is a change in circumstances or facts or if you receive or generate additional information that changes your answer to a question between the time of your original response and the time of the hearing, then you should submit, under oath, a supplemental response to your earlier answer to the question.

12. If you consider any question to be unduly burdensome, or if the response would require the production of a voluminous amount of material, please contact the undersigned counsel, as soon as possible, to discuss the situation and try to resolve the issue. Furthermore, if you object to any question on the grounds that the question seeks confidential information, or on any other grounds, please contact the undersigned counsel, as soon as possible, to discuss the situation and try to resolve the issue.

13. If the response to any question is voluminous, please make available all of the voluminous material at a designated location in Austin. Please provide a detailed index for the voluminous material with your response to the question to enable efficient review of the material. The index should include information sufficient to locate each individual document by page, file, and box number, date of each document, title of each document, description of each document if no document title exists, name of the preparer of each document, and length of each document.

14. If the requested information is included in previously furnished exhibits, workpapers, or responses to other discovery inquiries or otherwise, in hard copy or electronic format, please

furnish specific references thereto, including Bates Stamp page citations and detailed cross-references to the previously furnished information.

15. If a question requests the production of copyrighted material, you may provide a list of such material, including the title, publisher, author, edition, and page references relied on or otherwise relevant to the question.

**Claim of Privilege**

If any document is withheld under any claim of privilege, please provide a list that identifies each document for which a privilege is being claimed, including the date, sender, recipient(s) of the privileged document, recipient(s) of copies of the privileged document, subject matter of the privileged document, and the basis upon which a privilege is being claimed by the Company.

Respectfully submitted,

/s/ Todd F. Kimbrough  
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ATTORNEYS FOR EAST TEXAS SALT  
WATER DISPOSAL COMPANY

**CERTIFICATE OF SERVICE**

I certify that a true and correct copy of this document was served by email, facsimile, hand-delivery, overnight delivery, or 1st Class U.S. Mail on all parties of record in this proceeding on March 9, 2021.

*/s/ Todd F. Kimbrough*

**EXHIBIT A**

**EAST TEXAS SALT WATER DISPOSAL COMPANY'S FOURTH REQUEST FOR INFORMATION TO SOUTHWESTERN ELECTRIC POWER COMPANY**

**ETSWD 4-1.** Referring to SWEPCO's response to ETSWD 2-2, please confirm or deny that there were customer or load pro-forma adjustments related to the loss of the three industrial customers excluded from the calculation of Texas Retail production and transmission demand allocation factors. Please provide all of the schedules and workpapers supporting the response.

**ETSWD 4-2.** Referring to SWEPCO's response to TIEC 1-23 (b), please answer the following questions:

- a. Please explain in detail how SWEPCO determined the SPP OATT revenues received by SWEPCO associated with transmission investment that Texas retail customers are paying for through rates approved by the PUCT. How would these revenues be included in the SWEPCO's SPP OATT cost deferral proposal?
- b. Please provide all of the schedules and workpapers supporting the response.

**ETSWD 4-3.** Referring to Exhibit JOA-5 included in Mr. John Arron's testimony, please explain in detail how each of the following cost items was determined:

- a. SPP Charges and Fees of \$157,881,876;
- b. Non-SPP Charges of \$6,005,430;
- c. Other Transmission Charges of \$917,530.
- d. Please indicate how often each of these charges or fees is revised.
- e. Please provide all of the schedules and workpapers supporting the response.

**ETSWD 4-4.** Referring to the ATC Summary included in WP\_Exhibit JOA-5 included in Mr. John Arron's testimony, please explain in detail how each of the following cost items was determined:

- a. Schedule 1A of \$11,575,558;
- b. Schedule 9 of \$76,670,530;
- c. Schedule 11 of \$66,136,239;

- d. Schedule 12 of \$2,263,152;
- e. Other SPP of \$6,000;
- f. Non-SPP Charges of \$6,005,430;
- g. NERC Fee of \$914,530.
- h. Please indicate how often each of these charges or fees is revised.
- i. Please provide all of the schedules and workpapers supporting the response.

**ETSWD 4-5.** Referring to Ms. Jennifer Jackson’s testimony on revenue distribution among Texas Retail rate classes, please explain in detail why SWEPCO proposed a different rate class group for Oil Field Primary and Oilfield Secondary in this Docket as opposed to the single Oilfield Primary and Secondary rate class proposed and approved in Docket No. 46499 (SWEPCO’s last rate case). The following is a comparison of the grouping including Oil Field rate classes in this docket and in Docket No. 46449:

Docket No. 51415 SWEPCO Proposed Rate Class Group including Oil Field rate classes	Docket No. 46449 PUCT Approved Rate Class Group including Oil Field rate classes
Large Lighting & Power Primary	Lighting & Power Secondary
Large Lighting & Power Transmission	Lighting & Power Primary
	Lighting & Power Transmission
Metal Melting-Transmission	
Metal Melting-Primary	Metal Melting-Primary
Metal Melting-Secondary	Metal Melting-Secondary
Oilfield Primary	Oilfield Primary & Secondary
Oilfield Secondary	Cotton Gin

**ETSWD 4-6.** Referring to page 16 of Schedule P-3, please explain why the Large Lighting and Power Primary rate class was not assigned any cost included in the following FERC accounts:

- a. FERC Account 364-Poles, Towers, & Fixtures-Primary;
- b. FERC Account 365-Overhead Conductors & Devices-Primary;
- c. FERC Account 366-Underground Conduit-Primary;



- d. FERC Account 367- Underground Conductors & Devices –Primary.
- e. Please provide all of the schedules and workpapers supporting the response.

**ETSWD 4-7.** In developing the allocators for allocating the costs in the following FERC accounts among Texas retail rate classes, please explain why the Maximum Diversified Demand (MDD) for the Lighting and Power Primary rate class was adjusted to exclude a total of 10,434 MW:

- a. FERC Account 364-Poles, Towers, & Fixtures-Primary;
- b. FERC Account 365-Overhead Conductors & Devices-Primary;
- c. FERC Account 366-Underground Conduit-Primary;
- d. FERC Account 367- Underground Conductors & Devices –Primary.
- e. Please provide all of the schedules and workpapers supporting the response.