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

EAST TEXAS SALT WATER DISPOSAL COMPANY'S FIFTH 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 Fifth 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 10, 2021.

/s/ Todd F. Kimbrough

EXHIBIT A

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

ETSWD 5-1. Referring to page 26 of Ms. Jennifer Jackson's direct testimony, please answer the following:

- a. Please explain in detail why SWEPCO proposes updating its existing Experimental Economic Development Rider (EDR) to include two options to attract loads from a variety of different businesses with different load requirements.
- b. Please identify the types of businesses whose loads SWEPCO attempts to attract and please explain why these businesses are the targets for SWEPCO to attract loads. Please also identify the rate classes in which these businesses would take service from SWEPCO.
- c. For each of the types of businesses identified in (b), please provide the average load and demand (kwh and kW) of these businesses.
- d. For each of the types of business types identified in (b), please provide the number of the businesses within SWEPCO's Texas service territory that have been closed at the end of 2020. Please also identify the rate classes under which these businesses took service from SWEPCO.
- e. For the businesses identified in (d), please indicate if the closure of the businesses is due to the COVID-19 impact.
- f. Please confirm or deny that the COVID-19 crisis has resulted in closure or load reduction for businesses in 2020.
- g. Please provide all of the schedules and workpapers supporting the response.

ETSWD 5-2. Referring to pages 9-11 of Mr. Chad M. Burnett's direct testimony, please answer the following:

- a. Please explain how SWEPCO discovered and confirmed the permanent losses of the three large industrial customers (US Steel, Domtar, and Libbey Glass) referred to in the testimony. Please provide all of the schedules and workpapers supporting the response.

- b. Has SWEPCO used the same manner as described in the response to (a) to identify losses of any other businesses in Texas retail service area?
- c. If the answer to (b) is yes, please identify the number and the total load of any other identified businesses closures by rate class.
- d. If the answer to (b) is no, please explain why SWEPCO has not performed this exercise.
- e. Please provide all of the schedules and workpapers supporting the response.