



Control Number: 51415



Item Number: 274

Addendum StartPage: 0

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

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

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

MARCH 24, 2021

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Files provided electronically on the PUC Interchange

-  ETSWD_3-1_Attachment_1
-  ETSWD_3-3_Attachment_1
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**SOUTHWESTERN ELECTRIC POWER COMPANY'S RESPONSE TO EAST TEXAS
SALT WATER DISPOSAL COMPANY'S THIRD REQUEST FOR INFORMATION**

Question No. ETSWD 3-1:

Referring to SWEPCO's response to ETSWD's 2nd RFIs Question No. 2-4 (c) "The Company did not make a generic adjustment for COVID-19 to the test year load and customer data because at the time, the impact was neither fully known nor measurable," please answer the following:

- a. When did SWEPCO determine that the impact of COVID-19 was neither fully known nor measurable? Please provide all documents relevant to this response.
- b. What steps has SWEPCO taken to fully know and measure the impacts of COVID-19 since the end of the test year? If no steps have been taken, why not? If yes, what are those impacts and when were those impacts identified? Please provide all documents relevant to this response.
- c. What are the known and measurable COVID-19 impacts as of December 31, 2020? Please identify by rate class.
- d. Please provide all of the schedules and workpapers supporting the response.

Response No. ETSWD 3-1:

- a. To complete the record, the Company's response to ETSWD's Question 2-4 started by saying, "The COVID-19 pandemic essentially started during the final 10 days of the test year. The Company did not make a generic adjustment for COVID-19 to the test year load and customer data because at the time, the impact was neither fully known nor measurable." Since the test year consists of monthly data for the twelve months ending March 2020, and the pandemic only impacted the final 10 days of the month of March 2020, and since the Company does not have full deployment of interval metering for all customer classes (like AMI), the Company was unable to measure the impact of COVID-19 on the test year data. Furthermore, the CARES (Coronavirus Aid, Relief, and Economic Security) Act, a \$2.2 Trillion fiscal stimulus package was signed into law by President Trump on March 27, 2020, which was still within the test year, but the impact the stimulus package would have on SWEPCO's sales was unknown at the time of the filing. Since then, two additional fiscal stimulus packages have been passed (the Consolidated Appropriations Act in December 2020 and the American Rescue Plan in March 2021) along with significant monetary stimulus actions (lowering the Federal Funds rate to near zero) by the Federal Reserve Bank to counteract the drag on the economy from COVID-19. That, coupled with the fact that the pandemic has not ended, makes it difficult to fully measure the impact of COVID-19 on SWEPCO's Texas retail sales.
- b. The World Health Organization designated that COVID-19 became a pandemic in March of 2020. As of the preparation date of this RFI, it has not designated an end to the pandemic. Nevertheless, the Company does monitor its sales statistics on a monthly

basis and has noticed an overall decline in weather normalized retail sales since the pandemic began.

- c. See ETSWD 3-1 Attachment 1 for the weather normalized trends by class since the pandemic began. The charts at the top show how SWEPCO-Texas normalized GWh have changed since the end of the test year when the pandemic began. In total, annualized normalized sales are down 3.1%. By class, the increase in Residential sales (+ 3.1%), was more than offset by the decrease in Commercial (-4.3%), Industrial (-6.9%), and Other Retail (-0.7%) sales.
- d. See response to part c.

Prepared By: Glenn R. Newman

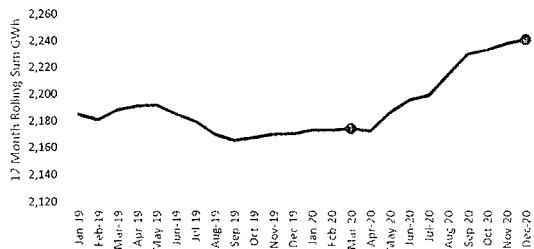
Title: Economic Forecast Anlyst Staff

Sponsored By: Chad M. Burnett

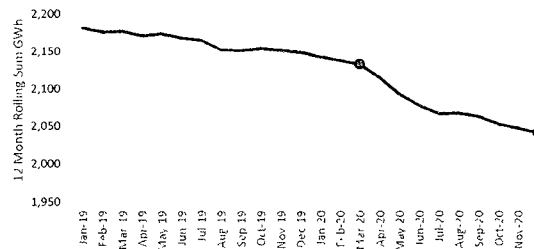
Title: Dir Economic Forecasting

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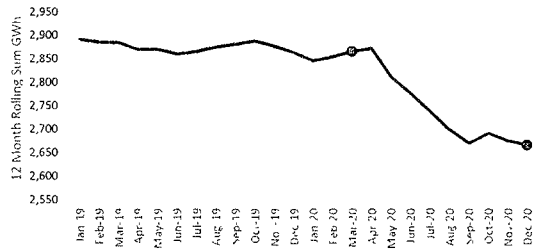
SWEPCO-TX Normalized Residential GWh Trend



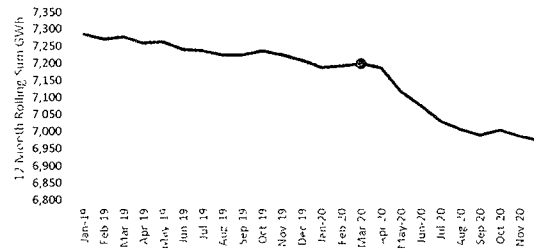
SWEPCO-TX Normalized Commercial GWh Trend



SWEPCO-TX Industrial GWh Trend



SWEPCO-TX Normalized Total Retail GWh Trend



JURIS	DATE	Residential		Commercial		Industrial		Other Retail		Total	
		Normalized kWh	12 Month Rolling Sum kWh	Normalized kWh	12 Month Rolling Sum kWh	Normalized kWh	12 Month Rolling Sum kWh	Normalized kWh	12 Month Rolling Sum kWh	Normalized kWh	12 Month Rolling Sum kWh
SWT	Jan-18	223,697,220		182,747,221		235,607,938		2,302,155		644,354,534	
SWT	Feb-18	190,988,812		163,095,891		225,640,509		2,294,049		582,019,261	
SWT	Mar-18	153,290,949		153,879,641		231,442,653		2,290,368		540,903,611	
SWT	Apr-18	129,187,143		157,206,338		238,772,689		2,288,341		527,454,511	
SWT	May-18	126,812,874		161,522,281		238,326,319		2,284,907		528,946,381	
SWT	Jun-18	185,484,863		196,326,708		255,371,959		2,278,062		639,461,592	
SWT	Jul-18	235,086,476		218,148,339		249,118,362		2,276,138		704,629,315	
SWT	Aug-18	244,482,644		224,747,136		240,967,620		2,277,794		712,475,194	
SWT	Sep-18	222,537,008		217,722,605		243,866,433		2,278,367		686,404,413	
SWT	Oct-18	155,954,431		183,168,695		245,042,482		2,277,355		586,442,963	
SWT	Nov-18	129,327,229		158,213,805		237,922,800		2,278,703		527,742,537	
SWT	Dec-18	183,256,513	2,180,106,162	167,495,074	2,184,273,734	238,250,088	2,880,329,852	2,282,321	27,408,560	591,283,996	7,272,118,308
SWT	Jan-19	228,098,125	2,184,507,067	179,528,148	2,181,054,661	246,221,427	2,890,943,341	2,275,850	27,382,255	656,123,550	7,283,887,324
SWT	Feb-19	187,257,948	2,180,776,203	157,470,752	2,175,429,522	219,561,749	2,884,864,581	2,275,470	27,363,676	566,565,919	7,268,433,982
SWT	Mar-19	160,454,268	2,187,939,522	154,851,012	2,176,400,893	230,654,604	2,884,076,532	2,272,233	27,345,541	548,232,117	7,275,762,488
SWT	Apr-19	131,962,863	2,190,715,242	151,372,006	2,170,566,561	224,181,495	2,869,485,338	2,269,328	27,326,528	509,785,692	7,258,093,669
SWT	May-19	127,580,885	2,191,483,253	164,120,058	2,173,164,338	238,141,762	2,869,300,781	2,266,888	27,308,509	532,109,593	7,261,256,881
SWT	Jun-19	178,877,441	2,184,875,831	190,678,220	2,167,515,850	245,515,975	2,859,444,797	2,263,955	27,294,402	617,335,591	7,239,130,880
SWT	Jul-19	229,528,022	2,179,317,377	214,938,318	2,164,305,829	254,389,320	2,864,715,755	2,264,850	27,283,114	701,120,510	7,235,622,075
SWT	Aug-19	235,020,813	2,169,855,546	212,179,401	2,151,738,094	250,838,997	2,874,587,132	2,264,328	27,269,648	700,303,539	7,223,450,420
SWT	Sep-19	217,903,730	2,165,222,268	216,686,697	2,150,702,186	250,048,139	2,880,768,838	2,264,785	27,256,066	686,903,351	7,223,949,358
SWT	Oct-19	158,054,726	2,167,322,563	185,946,664	2,153,480,155	251,534,582	2,887,260,938	2,265,410	27,244,121	597,801,382	7,235,307,777
SWT	Nov-19	131,717,692	2,169,713,026	155,632,508	2,150,898,858	226,834,798	2,876,172,936	2,265,902	27,231,320	516,450,900	7,224,016,140
SWT	Dec-19	183,469,159	2,169,925,672	164,875,937	2,148,279,721	224,795,887	2,862,718,735	2,269,685	27,218,684	575,410,668	7,208,142,812
SWT	Jan-20	230,933,489	2,172,761,036	173,234,076	2,141,985,649	228,773,990	2,845,271,298	2,269,097	27,211,931	635,210,652	7,187,229,914
SWT	Feb-20	187,185,913	2,172,689,001	152,842,670	2,137,357,567	228,259,699	2,853,969,248	2,251,362	27,187,823	570,539,644	7,191,203,639
SWT	Mar-20	161,339,612	2,173,574,345	149,489,547	2,131,996,102	241,472,121	2,864,786,765	2,249,406	27,164,996	554,550,686	7,197,522,208
SWT	Apr-20	130,761,971	2,172,373,453	133,819,913	2,114,444,009	231,364,058	2,871,969,328	2,247,998	27,143,666	498,193,940	7,185,930,456
SWT	May-20	140,933,506	2,185,726,074	141,886,692	2,092,210,643	178,161,307	2,811,988,873	2,246,600	27,123,378	463,228,105	7,117,048,968
SWT	Jun-20	188,278,291	2,195,126,924	175,681,112	2,077,213,535	210,262,100	2,776,734,998	2,245,100	27,104,523	576,466,603	7,076,179,980
SWT	Jul-20	233,016,328	2,198,615,230	203,885,302	2,066,160,519	215,790,644	2,738,136,322	2,245,250	27,084,923	654,937,524	7,029,996,994
SWT	Aug-20	250,732,045	2,214,326,462	212,887,488	2,066,868,606	211,703,860	2,699,001,185	2,243,962	27,064,557	677,567,355	7,007,260,810
SWT	Sep-20	233,244,549	2,229,667,281	212,230,107	2,062,412,016	220,775,896	2,669,728,942	2,245,851	27,045,623	668,496,403	6,988,853,862
SWT	Oct-20	161,198,315	2,232,810,870	176,467,997	2,052,933,349	272,943,340	2,691,137,700	2,247,059	27,027,272	612,856,711	7,003,909,191
SWT	Nov-20	136,584,354	2,237,677,532	149,514,222	2,046,815,063	210,649,588	2,674,952,490	2,245,793	27,007,163	498,993,957	6,986,452,248
SWT	Dec-20	186,363,567	2,240,571,940	158,839,446	2,040,778,572	215,605,195	2,665,761,798	2,248,146	26,985,624	563,056,354	6,974,097,934

Change since End of TY 3 1% -4 3% -6 9% -0 7% -3 1%

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Question No. ETSWD 3-2:

Referring to pages 9-11 of Mr. Chad M. Burnett's direct testimony, please confirm if there was any permanent loss of commercial and industrial customers other than the three industrial customers by the end of 2020. Please provide all of the schedules and workpapers supporting the response.

Response No. ETSWD 3-2:

The Company is not aware of any other large customers (> 1 MW) that have permanently shut down by the end of 2020. There is one Commercial account less than 1 MW that has temporarily idled and one Industrial account that is less than 1 MW that has since announced a plant closure.

Prepared By: Glenn R. Newman

Title: Economic Forecast Analyst Staff

Sponsored By: Chad M. Burnett

Title: Dir Economic Forecasting

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

Question No. ETSWD 3-3:

Please refer to SWEPCO's response to ETSWD's 2nd RFIs Question No. 2-4 in answering the following:

- a. Please admit that there were permanent losses of commercial and small or medium industrial businesses in SWEPCO Texas service area in 2020.
- b. If the answer to (a) is admit, please identify the permanent losses of commercial and small industrial customers as well as medium industrial customers by rate class at the end of 2020 by rate class.
- c. Please provide the monthly number of customers, kilowatt-hour ("kWh") usage, kilowatt ("kW") demand for each of the Texas retail classes from April 2020 through December 2020.
- d. For the rate classes experiencing a loss of customers and load as shown in (c), are any of those losses related to permanent business closure?
- e. If the answer to (d) is yes, please identify the number of customers and load usage associated with the customers with permanent business closures.
- f. Please provide all of the schedules and workpapers supporting the response.

Response No. ETSWD 3-3:

- a. See response to ETSWD 3-2. There was one industrial customer less than 1 MW that closed its plant in Sep of 2020, after the end of the test year.
- b. [REDACTED]
- c. See ETSWD 3-3 Attachment 1 for the actual monthly customers, and kWh sales for each of the Texas retail classes from April 2020 through December 2020. Without full interval metering installed (like AMI), the Company does not have actual kW demand available for each of the Texas retail classes for the time period requested.
- d. See response to part b above.
- e. See response to part b above.
- f. See response to part c above.

The information responsive to ETSWD 3-3 subpart b is HIGHLY SENSITIVE PROTECTED MATERIAL under the terms of the Protective Order. Due to current restrictions associated with COVID-19, this information is being provided electronically and a secure login to access the information will be provided upon request to individuals who have signed the Protective Order Certification.

Prepared By: Glenn R. Newman

Title: Economic Forecast Analyst Staff

Sponsored By: Chad M. Burnett

Title: Dir Economic Forecasting

juris	Date	Residential		Commercial		Industrial		Other Retail	
		KWH	CUST	KWH	CUST	KWH	CUST	KWH	CUST
SWT	Apr-20	127,092,895	152,067	133,588,307	30,403	231,364,058	4,506	2,247,998	155
SWT	May-20	131,489,581	152,382	136,982,775	30,407	178,161,307	4,474	2,246,600	155
SWT	Jun-20	176,490,193	152,645	169,756,220	30,364	210,262,100	4,428	2,245,100	155
SWT	Jul-20	226,911,516	152,814	200,815,981	30,386	215,790,644	4,430	2,245,250	155
SWT	Aug-20	231,736,563	152,984	203,349,296	30,381	211,703,860	4,422	2,243,962	155
SWT	Sep-20	220,839,642	153,282	206,016,854	30,365	220,775,896	4,409	2,245,851	155
SWT	Oct-20	143,428,560	153,256	167,552,317	30,368	272,943,340	4,371	2,247,059	155
SWT	Nov-20	130,115,601	153,025	148,419,485	30,371	210,649,588	4,215	2,245,793	156
SWT	Dec-20	172,687,177	153,122	155,590,526	30,409	215,605,195	4,241	2,248,146	165

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Question No. ETSWD 3-4:

Please provide the following information for the Oil Field Primary rate class and the Oil Field Secondary rate class:

- a. Please provide the monthly number of customers and kWh usage for each of these two classes from April 2020 through December 2020.
- b. If either of these two rate classes experienced loss of customers and load as shown in (a), please indicate if those losses are permanent or temporary. If temporary, please explain the circumstances making it temporary and when you expect those losses to be reversed. If the losses are permanent, please identify the number of customers and their associated load usage..
- c. Are the number of customers the same as the number of meters for these two rate classes? Please explain how SWEPCO determines the number of customers for these two rate classes.
- d. Please provide all of the schedules and workpapers supporting the response.

Response No. ETSWD 3-4:

- a. See ETSWD 3-4 Attachment 1
- b. Unknown
- c. Yes, the number of customers represents the number of meters for this class. The customer is included in the customer count if the account is billed for the month.
- d. n/a

Prepared By: Earlyne T. Reynolds

Title: Reg Pricing & Analysis Mgr

Sponsored By: Jennifer L. Jackson

Title: Reg Pricing & Analysis Mgr

CUSTOMER COUNT 2020

RATE	RATE CODE	VOLTAGE	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC
OILFIELD PRIMARY	330	PRI	1,440	1,419	1,385	1,380	1,387	1,373	1,380	1,397	1,384
OILFIELD SECONDARY	331	SEC	61	58	59	59	59	60	68	74	79

BILLED KWH 2020

RATE	RATE CODE	VOLTAGE	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC
OILFIELD PRIMARY	330	PRI	29,671,009	19,955,408	23,194,024	26,541,748	25,192,959	26,999,807	26,451,789	25,540,416	36,271,141
OILFIELD SECONDARY	331	SEC	376,700	266,866	353,578	339,125	313,612	325,436	839,171	744,739	672,824

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Question No. ETSWD 3-5:

Please refer to SWEPCO's response to ETSWD's 2nd RFIs Question No. 2-6 (c) and provide the following information:

- a. the total number of line transformers installed for each rate class for the test year;
- b. the average number of customers usually connected to each line transformer for each rate class;
- c. the types of line transformers used for each rate class;
- d. the costs of line transformers used for each rate class.
- e. Please provide all of the schedules and workpapers supporting the response.

Response No. ETSWD 3-5:

- a. – e. SWEPCO does not maintain this information by rate class.

Prepared By: Earlyne T. Reynolds

Title: Reg Pricing & Analysis Mgr

Sponsored By: Jennifer L. Jackson

Title: Reg Pricing & Analysis Mgr

Sponsored By: John O. Aaron

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Sponsored By: Bryan J. Coffey

Title: Load Research Analyst Sr