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

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

Southwestern Electric Power Company (SWEPCO or Company) requests that Cities Advocating Reasonable Deregulation's (CARD) provide the following information and answer the following questions under oath within the time provided by Public Utility Commission of Texas (Commission) rules and/or applicable orders, or sooner if practicable. The answers should be provided in sufficient detail to present all relevant facts. 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. For each response, please state the Request for Information and identify the individuals responsible for preparing and sponsoring the response by name and title.

For any responses that require the use of or reference to information previously provided by the Company in this case that has been designated "Confidential" or "Highly Sensitive" material, please provide responses in accordance with the terms of the Protective Order and the Commission's Rules relating to "Confidential" and "Highly Sensitive" materials. See 16 Tex. Admin. Code (TAC) § 22.142.

These requests are deemed to be continuing in nature and require further and supplemental responses from a party if it receives or generates additional information within the scope of these data requests between the time of the original responses and the time of the hearing in this proceeding.

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This is a request to fully respond to the attached RFIs and to produce any of the designated documents or tangible things that are described in the attached RFIs. Production of responses to the designated Requests should be made to each of the persons below and emailed to [aepaustintx@aep.com](mailto:aepaustintx@aep.com):

Stacy Bankston-Pankratz  
Regulatory Case Manager  
American Electric Power Service Corporation  
400 West 15<sup>th</sup> Street, Suite 1520  
Austin, Texas 78701  
Telephone: (214) 777-1081  
Facsimile: (512) 481-4591  
Email: [slbankston@aep.com](mailto:slbankston@aep.com)  
[aepaustintx@aep.com](mailto:aepaustintx@aep.com) (Service)

Melissa Gage  
Associate General Counsel  
Leila Melhem  
Senior Counsel  
American Electric Power Service Corporation  
400 West 15<sup>th</sup> Street, Suite 1520  
Austin, Texas 78701  
Telephone: (512) 481-3320  
Facsimile: (512) 481-4591  
Email: [magage@aep.com](mailto:magage@aep.com)  
[lmelhem@aep.com](mailto:lmelhem@aep.com)  
[aepaustintx@aep.com](mailto:aepaustintx@aep.com) (Service)

William Coe  
Kerry McGrath  
Patrick Pearsall  
Duggins Wren Mann & Romero, LLP  
P.O. Box 1149  
Austin, Texas 78767  
Telephone: (512) 744-9300  
Facsimile: (512) 744-9399  
Email: [wcoe@dwmrlaw.com](mailto:wcoe@dwmrlaw.com)  
[kmcgrath@dwmrlaw.com](mailto:kmcgrath@dwmrlaw.com)  
[ppearsall@dwmrlaw.com](mailto:ppearsall@dwmrlaw.com)

### Instructions & Definitions

1. A reference to “SWEPCO” or the “Company” shall mean Southwestern Electric Power Company.
2. A reference to “CARD” shall mean Cities Against Reasonable Deregulation.
3. The term “Commission” refers to the Public Utility Commission of Texas.
4. Reference to “you” or “your” means all divisions, departments, bureaus, or agencies of the party served, and all witnesses whose testimony the respective party to which this Request is submitted intends to present to the Public Utility Commission of Texas, and all persons acting or purporting to act for or on behalf of the respective party, including all staff, employees, agents, representatives, attorneys, consultants, economists, engineers, and accountants.
5. “Document” or “documents” is intended to be comprehensive and shall mean every original (or an identical copy if the original is unavailable) and every copy which differs in any way from the original of every writing, recording (e.g., photograph, videotape, audiotape), or other tangible expression, whether handwritten, typed, drawn, sketched, printed, or recorded by any physical, mechanical, electronic, or electrical means whatsoever, and shall be construed to the fullest extent of the Commission’s Procedural Rules and the Texas Rules of Civil Procedure, and shall include, without limitation all agreements, contracts, communications, correspondence, letters, telegrams, telexes, messages, memoranda, records, reports, books, summaries, tape recordings or other records of personal conversations, minutes or summaries or other records of meetings and conferences, summaries or other records of negotiations, other summaries, diaries, diary entries, calendars, appointment books, time records, instructions, work assignments, financial statements, work sheets, workpapers, drafts, graphs, maps, charts, tables, accounts, analytical records, consultants’ reports, appraisals, bulletins, brochures, pamphlets, circulars, trade letters, press releases, notes, notices, marginal notations, notebooks, telephone records, bills, statements, records of obligation and expenditure, invoices, lists, journals, advertising, recommendations, printouts, compilations, tabulations, analyses, studies, surveys, transcripts of hearings, transcripts of testimony, affidavits, expense reports, microfilm, microfiches, articles, speeches, tape or disk recordings, sound recordings, video recordings, film, tape, photographs, punch cards,

programs, data compilation from which information can be obtained (including matter used in data processing) and other printed, written, handwritten, typewritten, recorded, stenographic, computer-generated, computer-stored, electronically-stored matter, however and by whomever produced, prepared, reproduced, disseminated, or made.

6. "Person" means any natural person, firm, association, partnership, joint venture, corporation, estate, trust, receiver, syndicate, municipal corporation, governmental agency, any other form of legal entity, and other group or combination acting as a unit.
7. "Relating to" a subject means making a statement about, mentioning, referring to, discussing, describing, reflecting, identifying, dealing with, consisting of, constituting or in any way pertaining, in whole or in part, to the subject.
8. The words "communication" or "communications" include any verbal conversations or any other statement from one person to another, including but not limited to, any interview, conference, conversation, discussion, meeting or telephone conversation.
9. "Identify" means:
  - a. as to a "person," stating his, her or its:
    - (i) legal, full and customarily used names;
    - (ii) present residential or business address;
    - (iii) job title; and
    - (iv) name of employer.
  - b. as to a document, act, event, transaction or occurrence, stating:
    - (i) its date, authors or participants;
    - (ii) the place where it took place, was created or occurred;
    - (iii) its purpose and subject matter; and
    - (iv) a concise description of what transpired.
10. "Including" means and refers to "including but not limited to."
11. Use of the singular or plural word form in a request is not to be interpreted to exclude information or documents from the scope or intent of the specific request.
12. For each response, please restate the RFI and identify the individual(s) responsible for preparing and sponsoring the response by name and title.
13. For each document produced that is generated by computer, please identify:
  - a. the nature and source of the data constituting the input;

- b. the form of the input (*e.g.*, tapes, punch cards);
  - c. the recording system employed (*e.g.*, program, flow charts); and
  - d. the person(s) responsible for processing the input and/or performing the programming.
14. If the response to any request is voluminous, please provide a detailed index of the voluminous material, pursuant to 16 TAC § 22.144(h)(4).
15. If the information requested was included in previously furnished exhibits, schedules, work papers, responses to other discovery inquiries, or otherwise, in hard copy or electronic format, please furnish specific references to the previously furnished materials, including Bates Stamp page citations and detailed cross-references.
16. If, in answering any of these requests, there is any ambiguity in interpreting either the request or a definition or instruction applied thereto, please contact SWEPCO's attorney, Patrick Pearsall at (512) 744-9300, extension 1832.
17. If an RFI calls for production of a document that was, but is no longer, in your possession, or subject to your control, or in existence, state whether it:
- a. is missing or lost;
  - b. has been destroyed;
  - c. has been transferred, voluntarily or involuntarily to others; or
  - d. has been otherwise disposed of; and in each instance, explain the facts concerning how the document became unavailable; state the date or approximate date of the unavailability; the contents of the document; and the person who authorized the transfer, destruction or other disposition of said document. Documents prepared prior to, but which relate to or refer to, the time period covered by these RFIs are to be identified.
18. If you decline to respond to any request for information or data on the basis of privilege, please state as to each such request an explanation for the refusal. Identify those documents and communications that are withheld from the response to each specific data request. The identification shall be served within the time specified by the presiding examiner for this proceeding and in accordance with the Rules of the Commission, and shall:
- a. specify the date of the document, its author(s) (with title and designation if an attorney), and recipients (with title and designation if an attorney);

- b. contain a brief summary of the subject matter of the document; and
- c. contain a brief statement of the reason that, in your opinion, the assertion of privilege is justified.

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

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**SWEPCO 1-1.** Please reference Mr. Nalepa's Figure\_1 WP spreadsheet. Cell E9 contains a 1.06465327 amount in the formula.

- a. What does this number represent?
- b. Please provide support for this number.

**SWEPCO 1-2.** Please reference Mr. Nalepa's Figure 1 and the supporting spreadsheet. The sum Revenue Requirement (Texas jurisdictional) adjustments are a reduction of \$48,878,438.

- a. Why is Mr. Nalepa subtracting \$70,255,335 from SWEPCO's request when the Texas adjustments recommended by CARD only add up to \$48,878,438?
- b. When the \$48,878,438 is subtracted from SWEPCO's requested base rate deficiency of \$105,026,238, it results in a base rate deficiency of \$56,147,800. Is this CARD's actual recommendation revenue deficiency instead of the \$34,800,903 identified in Mr. Nalepa's testimony?



Respectfully submitted,

Melissa Gage

State Bar No. 24063949

Email: [magage@aep.com](mailto:magage@aep.com)

Leila Melhem

State Bar No. 24083492

Email: [lmelhem@aep.com](mailto:lmelhem@aep.com)

400 West 15<sup>th</sup> Street, Suite 1520

Austin, Texas 78701

Telephone: (512) 481-3320

Facsimile: (512) 481-4591

**SERVICE:** [aepaustintx@aep.com](mailto:aepaustintx@aep.com)

**AMERICAN ELECTRIC POWER SERVICE  
CORPORATION**

William Coe

State Bar No. 00790477

Email: [wcoe@dwmrlaw.com](mailto:wcoe@dwmrlaw.com)

Kerry McGrath

State Bar No. 13652200

Email: [kmcgrath@dwmrlaw.com](mailto:kmcgrath@dwmrlaw.com)

Patrick Pearsall

State Bar No. 24047492

Email: [ppersall@dwmrlaw.com](mailto:ppersall@dwmrlaw.com)

P.O. Box 1149

Austin, Texas 78767

Telephone: (512) 744-9300

Facsimile: (512) 744-9399

**DUGGINS WREN MANN & ROMERO, LLP**

By: \_\_\_\_\_

  
Patrick Pearsall

**ATTORNEYS FOR SOUTHWESTERN  
ELECTRIC POWER COMPANY**

**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 April 5, 2021, in accordance with the Second Order Suspending Rules issued in Project No. 50664.

  
\_\_\_\_\_  
Patrick Pearsall