



Control Number: 51415



Item Number: 33

Addendum StartPage: 0



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

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

**OFFICE OF PUBLIC UTILITY COUNSEL'S
SECOND REQUEST FOR INFORMATION TO
SOUTHWESTERN ELECTRIC POWER COMPANY**

Pursuant to 16 Texas Administrative Code (“TAC”) § 22.144, the Office of Public Utility Counsel (“OPUC”) submits this Second Request for Information to Southwestern Electric Power Company (“SWEPCO”). OPUC 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. OPUC 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, 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.

SOAH DOCKET NO. 473-21-0538
PUC Docket No. 51415
OPUC's Second Request for Information to
Southwestern Electric Power Company

- 2-1. Please refer to the Direct Testimony of Mr. Paul Pratt, Jr., pages 23 – 28. Please provide American Electric Power Service Company (“AEPSC”) Customer Services budgeted and actual expenses for each of the years 2015, 2016 and 2017. Please include in your response the budgeted and actual expense for SWEPCO for the same period.
- 2-2. Please refer to the Direct Testimony of Mr. Paul Pratt, Jr., page 32. Please provide AEPSC’s Customer Services budgeted and actual expenses as shown in Figure 6 with the short-term and long-term incentive compensation amounts included.
- 2-3. Please refer to the Direct Testimony of Mr. Paul Pratt, Jr., page 32. Please provide a detailed description of the services provided with the implementation of “customer relationship management, engagement and survey tools” that were not provided in the years prior to 2018. Please include in your response the budgeted and actual expenses for these services in each of the years 2018, 2019 and the test year in total for AEPSC as well as the amount allocated to SWEPCO.
- 2-4. Please refer to the Direct Testimony of Mr. Paul Pratt, Jr., page 30. Please provide the amount of outside services costs included in each of the amounts shown in Figure 5. Please include a detailed description of the services provided by each vendor by year and the associated amounts paid to each vendor.
- 2-5. Please refer to the Direct Testimony of Mr. Brian Bond, Table 2. Please provide a detailed explanation of the significant increase in Environmental Services expense from 2018 to 2019 and the test year. Please identify specific categories of cost increases and the associated actual expenses in 2019 and the test year for each category.
- 2-6. Please refer to the Direct Testimony of Mr. Brian J. Frantz, executive summary, page 4. Please provide a chart that includes the same breakout of cost categories included on page 4 of Mr. Frantz’s executive summary for each of the last four calendar years.
- 2-7. Please refer to the Direct Testimony of Mr. Brian J. Frantz, Table 5. Please provide a breakdown by AEPSC department of the \$21.4 million that was directly assigned to SWEPCO during the test year. Please provide a detailed description of the projects according to the AEPSC department to which these directly assigned costs relate to the project.
- 2-8. Please refer to the Direct Testimony of Mr. Brian J. Frantz, Exhibit BJJ-8. Please provide the same information contained in this exhibit on page 4 as it relates to the charges to SWEPCO from Dolet Hills Lignite Co. LLC (“Dolet Hills”) for each of the last four calendar years. Please provide the information by FERC account.

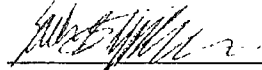
SOAH DOCKET NO. 473-21-0538
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- 2-9.** Please refer to the Direct Testimony of Mr. Brian J. Frantz, Exhibit BJJ-18. Please provide a detailed description of the Pro Forma adjustment to FERC Account 9230 on page 11 of 19.
- 2-10.** Please refer to the Direct Testimony of Mr. Patrick L. Baryenbruch, Exhibit 15. Please provide the underlying reasons for the Management Consultant outside services costs and the Professional Engineering outside services costs for Environmental & Safety services provided by AEPSC to SWEPCO. Please include the identification of any particular project or current asset. Please also include the amount that is related to the Texas jurisdiction for each category of cost.
- 2-11.** Please refer to the Direct Testimony of Mr. Andrew R. Carlin, page 14. Please provide a copy of the agreement between SWEPCO and International Brotherhood of Electrical Workers (“IBEW”) Locals 329 as it relates to the short-term incentive (“STI”) compensation requested in this Application. Please include in your response the total amount of STI compensation for union represented employees for SWEPCO and the total included in the cost of service for the Texas jurisdiction, broken down between the expense and capitalized amounts.
- 2-12.** Please refer to the Direct Testimony of Mr. Andrew R. Carlin, page 31. Please provide copies of any communications with SWEPCO employees regarding the STI compensation awarded during the test year.
- 2-13.** Please refer to the Direct Testimony of Mr. Andrew R. Carlin, page 31. Please provide copies of any communications with AEPSC employees with respect to the STI compensation awarded during the test year, both before and after the STI compensation awards were made to the employees.
- 2-14.** Please refer to the Direct Testimony of Mr. Andrew R. Carlin, page 31. Please provide copies of any communications, presentations or meeting notes concerning the change in the funding measure for the Annual Incentive Plan being based on a “balanced scorecard of performance measures” to being based entirely on AEP’s Operating Earnings per Share.
- 2-15.** Please refer to Schedule H-5.3b, sponsored by Mr. Michael A. Baird, page 4. Please provide a detailed description of the capital additions and associated costs at Dolet Hills for each of the years 2016, 2017, 2018 and 2019 that are included in the amounts shown on the line item WSX111023.

Dated: November 9, 2020

Respectfully submitted,

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State Bar No. 24042276



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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing document was served on all parties of record in this proceeding on this 9th day of November 2020, by facsimile, electronic mail, and/or Second class, U.S. Mail.



Zachary Stephenson