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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

**SOUTHWESTERN ELECTRIC POWER COMPANY'S SECOND SET OF REQUESTS
FOR INFORMATION TO EASTMAN CHEMICAL COMPANY**

Southwestern Electric Power Company (SWEPCO or Company) requests that Eastman Chemical Company (Eastman) 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.

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:

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

Melissa Gage
Associate General Counsel
Leila Melhem
Senior Counsel
American Electric Power Service Corporation
400 West 15th Street, Suite 1520
Austin, Texas 78701
Telephone: (512) 481-3320
Facsimile: (512) 481-4591
Email: magage@aep.com
lmelhem@aep.com
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
kmcgrath@dwmrlaw.com
ppearsall@dwmrlaw.com

Instructions & Definitions

1. A reference to “SWEPCO” or the “Company” shall mean Southwestern Electric Power Company.
2. A reference to “Eastman” shall mean Eastman Chemical Company.
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.

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ELECTRIC POWER COMPANY FOR § OF
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**SOUTHWESTERN ELECTRIC POWER COMPANY'S SECOND SET OF REQUESTS
FOR INFORMATION TO EASTMAN CHEMICAL COMPANY**

SWEPCO 2-1. Please provide all one-line diagrams or other schematics associated with the provision of electric service from the Eastman cogeneration facility to any behind-the-meter customers or facilities on the Eastman campus in Longview, TX. Include voltage levels of the facilities.

- a. Does Eastman utilize any facilities owned or operated by SWEPCO to provide service from the cogeneration facility to any tenants or other customers with Eastman-owned or SWEPCO-owned meters?
- b. If confirmed, please provide the name and voltage level of those facilities.
- c. If confirmed, please provide any details associated with the use of any transmission facilities, including any SPP reservations associated with the use of those facilities.

SWEPCO 2-2. Please provide any invoices or other billings from Eastman or the Eastman cogeneration facility to any facilities that purchase or procure electricity from the Eastman cogeneration facility in Longview, TX to behind the meter customers or facilities on the Eastman campus for 2017, 2018, 2019, and the test year.

SWEPCO 2-3. Please provide customer usage data associated with any purchases or sales or electricity from the Eastman cogeneration facility to behind the meter customers or facilities on the Eastman campus, including peak monthly demand data by customer or facility, with hour and date, as well as monthly energy usage, by customer, for 2017, 2018, 2019, and the test year.

SWEPCO 2-4. Does Eastman have reverse power relaying in place that would prevent the loads on site from taking energy from the SWEPCO system when the BTM generation experiences a forced outage such that it cannot cover the entire load?

SWEPCO 2-5. In the event SWEPCO placed reverse power relaying to prevent any unapproved withdrawal of energy from the SWEPCO system:

- a. Confirm or Deny -- Would the sudden loss of power to any of the loads create a danger to any of the employees on the facility?
 - i. If confirmed, how long would Eastman need SWEPCO to provide back-up power for Eastman to safely shut down its facilities?
- b. Confirm or Deny - Would the sudden loss of power to any of the loads create a danger to the public outside the facility?

- i. If confirmed, how long would Eastman need SWEPCO to provide back-up power for Eastman to safely shut down its facilities?
- c. Confirm or Deny – Would the sudden loss of power to any of the loads create a large financial loss of product.
 - i. If confirmed, how long would Eastman need in terms of notice to avoid this loss of product?

SWEPCO 2-6. Is the Eastman generating facility registered as a resource with the SPP RTO? If so, why?

SWEPCO 2-7. When operating, is the Eastman Generator interconnected and synchronized with the SPP Transmission System? If so, why?

SWEPCO 2-8. When the load at the Eastman facility is being served using the Eastman Generation, is it interconnected and synchronized with the SPP Transmission System? If so, why?

SWEPCO 2-9. Confirm or deny if South Texas Eastman connected load would remain online and connected to Eastman's generation if SPP ordered SWEPCO to disconnect both North Texas Eastman and South Texas Eastman yards from the SPP Transmission System?

Respectfully submitted,

Melissa Gage
State Bar No. 24063949
Email: magage@aep.com
Leila Melhem
State Bar No. 24083492
Email: lmelhem@aep.com
400 West 15th Street, Suite 1520
Austin, Texas 78701
Telephone: (512) 481-3320
Facsimile: (512) 481-4591
SERVICE: aepaustintx@aep.com
**AMERICAN ELECTRIC POWER SERVICE
CORPORATION**

William Coe
State Bar No. 00790477
Email: wcoe@dwmrlaw.com
Kerry McGrath
State Bar No. 13652200
Email: kmcgrath@dwmrlaw.com
Patrick Pearsall
State Bar No. 24047492
Email: 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 9, 2021, in accordance with the Second Order Suspending Rules issued in Project No. 50664.



Patrick Pearsall