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

2021 APR 26 AM 10:40

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

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

Cities Advocating Reasonable Deregulation's ("CARD") Thirteenth Set of Requests for Information ("RFIs") to Southwestern Electric Power Company ("SWEPCO") is hereby filed in this docket. Responses to the RFIs set forth on Exhibit A should be served on Alfred R. Herrera, Herrera Law & Associates, PLLC at 4524 Burnet Road, Austin, Texas 78756, within four (4) calendar days of service hereof or no later than **April 30, 2021**, or as modified by Order. Exhibit A is attached hereto and incorporated herein for all purposes.

**DEFINITIONS**

1. "SWEPCO," the "Company," and "Applicant" refer to Southwestern Electric Power Company and its affiliates.
2. "You," "yours," and "your" refer to SWEPCO (as defined above), including its directors, officers, employees, consultants, agents and attorneys.
3. "Document" and "documents" mean any written, recorded, filmed, or graphic matter, whether produced, reproduced, or on paper, cards, tapes, film, electronic facsimile, computer storage device of any other media, including, but not limited to, 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 and summaries of interviews, reports of consultants, appraisals, forecasts, tape recordings, or any form of recording that is capable of being transcribed into written form.
4. The term "communication" includes all verbal and written communications (including written records of verbal communications) of every kind, including but not limited to, telephone calls, conferences, letters and all memoranda or other documents concerning the requested item. Where communications are not in writing, provide copies of all memoranda and documents and describe in full the substance of the communication to the extent that substance is not reflected in the memoranda and documents provided and to the extent it is within the knowledge of SWEPCO.

5. “Identification” of a document includes stating (a) the nature of the document (e.g., letter, memorandum, corporate minutes), (b) the date, if any, appearing thereon, (c) the date, if known, on which the document was prepared, (d) the title of the document, (e) the general subject matter of the document, (f) the number of pages comprising the document, (g) the identity of each person who signed or initialed the document, (h) the identity of each person to whom the document was addressed, (i) the identity of each person who received the document or reviewed it, (j) the location of the document, and (k) the identity of each person having custody of, or control over, the document. Identification of a document includes identifying all documents known or believed to exist, whether or not in the custody of SWEPCO or in the custody of its attorneys or other representatives or agents.
6. “Identification” of a person includes stating his or her full name, his or her most recent known business address and telephone number, his or her present position, and his or her prior connection or association with any party to this proceeding.
7. “Person” refers to, without limiting the generality of its meaning, every natural person, corporate entity, partnership, association (whether formally organized or ad hoc), joint venture, unit operation, cooperative, municipality, commission, governmental body or agency.
8. Capitalized terms not otherwise defined herein shall have the meaning attributed to them in the referenced testimony.

### **INSTRUCTIONS**

1. If any RFI appears confusing, please request clarification from the undersigned counsel.
2. In providing your responses, please start each response on a separate page and type, at the top of the page, the RFI that is being answered.
3. As part of the response to each RFI, please state, at the bottom of the answer, the name and job position of each person who participated in any way, other than providing clerical assistance, in the preparing of the answer. If the RFI has sub-parts, please identify the person or persons by sub-part. Please also state the name of the witness in this docket who will sponsor the answer to the RFI and who can vouch for the truth of the answer. If the RFI has sub-parts, please identify the witness or witnesses by sub-part.
4. Rather than waiting to provide all of the responses at the same time, please provide individual responses as each becomes available.
5. If SWEPCO considers any RFI to be unduly burdensome, or if the response would require the production of a voluminous amount of material, please call the undersigned counsel as soon as possible in order to discuss the situation and to try to resolve the problem. Likewise, if SWEPCO objects to any of the RFIs on the grounds that the RFI seeks proprietary information, or on any other grounds, please call the undersigned counsel as soon as possible.

6. If any document is withheld under any claim of privilege, please furnish a list identifying each document for which a privilege is claimed, together with the following information: date, sender, recipients, recipients of copies, subject matter of the document, and the basis upon which such privilege is claimed.
7. These requests shall be deemed continuing so as to require further and supplemental responses if SWEPCO receives or generates additional information within the scope of these requests between the time of the original response and the time of the hearings.

Respectfully submitted,

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By: /s/ Alfred R. Herrera

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**ATTORNEYS FOR CITIES ADVOCATING  
REASONABLE DEREGULATION**

### CERTIFICATE OF SERVICE

I hereby certify that on this 26th day of April, 2021, a true and correct copy of CARD's *Thirteenth Set of Requests for Information to SWEPCO* was served upon all parties of record via electronic mail, in accordance with the Order Suspending Rules, issued in Project No. 50664.

By: /s/ Leslie Lindsey

Leslie Lindsey

**EXHIBIT A**

**SOAH DOCKET NO. 473-21-0538  
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THIRTEENTH SET OF REQUESTS FOR INFORMATION TO  
SOUTHWESTERN ELECTRIC POWER COMPANY**

- 13-1. Please provide a copy of Mr. D'Ascendis testimony in Word.
- 13-2. Please provide copies of Schedules DWD-1R through DWD-17R in Microsoft Excel. Please include keep all data formulas embedded in the worksheet.
- 13-3. Please provide copies of the source documents, data and work papers associated with the development of Schedules DWD-1R through DWD-17R. Please provide the underlying data and Exhibits in both paper and electronic (Microsoft Excel Worksheet) forms. For the Microsoft Excel version, please include keep all formulas embedded in the worksheet.
- 13-4. Please provide copies of all articles, publications, regulatory decisions, references, and/or documents cited in the testimony and/or footnotes. If the reference is a book, please provide a copy of the relevant section of the book.
- 13-5. Please provide: (1) copies of the source documents, data and work papers associated with the development of Charts 1-13; and (2) the data and work papers in both paper and electronic (Microsoft Excel Worksheet) forms. For the Microsoft Excel version, please include keep all formulas embedded in the worksheet.
- 13-6. Please provide copies of all credit reports by S&P and Moody's on SWEPCO and AEP in 2021.
- 13-7. Please provide a list of all regulatory commission proceedings in which Mr. D'Ascendis testified on rate of return issues in the past five years (2016-21), including the date, docket number, state, utility, for each proceeding as well as the return on equity recommended by Mr. D'Ascendis and the return on equity that was ultimately adopted by the regulatory commission.