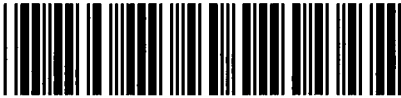




Control Number: 51415



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Addendum StartPage: 0

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

2021 MAY -7 PM 2:4

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

SOUTHWESTERN ELECTRIC POWER COMPANY'S RESPONSE TO TEXAS
INDUSTRIAL ENERGY CONSUMERS' FOURTEENTH SET OF REQUESTS FOR
INFORMATION

MAY 7, 2021

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

**SOUTHWESTERN ELECTRIC POWER COMPANY'S RESPONSE TO TEXAS
INDUSTRIAL ENERGY CONSUMERS' FOURTEENTH SET OF REQUESTS FOR
INFORMATION**

Question No. TIEC 14-1:

The following questions refer to the Rebuttal Testimony of Richard Ross:

Referring to page 7, lines 18-20, please identify each and every instance in which SPP instructed its members or SWEPCO to include all the BTMG in the transmission billing determinants unless there is an exception by FERC.

Provide the date of the instruction, who made it, who received it, and the statements that were made by any person involved. To the extent there are emails, text messages, writings, or electronic messages of any kind regarding this instruction, please provide those.

Response No. TIEC 14-1:

SWEPCO does not maintain records of each and every instance where SPP instructed its members to include all the BTMG in the transmission billing determinants unless there is an exception by FERC. Furthermore, it is not possible for SWEPCO to provide information about meetings between SPP and other members where SWEPCO was not in attendance. Please see the company's response to TIEC 6-3.

Prepared By: C. Richard Ross

Title: Dir Trans RTO Policy

Sponsored By: C. Richard Ross

Title: Dir Trans RTO Policy

**SOAH DOCKET NO. 473-21-0538
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**SOUTHWESTERN ELECTRIC POWER COMPANY'S RESPONSE TO TEXAS
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Question No. TIEC 14-2:

To the extent not provided in response to the previous RFI, provide the same information with respect to SPP's direction "to include retail BTMG in its monthly load data" as referenced on page 8, line 19 and page 9, line 20 of Mr. Ross's testimony.

Response No. TIEC 14-2:

SWEPSCO is not aware of any further information that would be responsive to this question.

Prepared By: C. Richard Ross

Title: Dir Trans RTO Policy

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Question No. TIEC 14-3:

With respect to the statement on page 10, lines 6-10, please identify all instances in which SPP acknowledged the referenced possible exceptions. Please provide the date of the acknowledgement, who made it, who received it, and the statements that were made by any person involved. To the extent that there are emails, text messages, or writings or electronic messages of any kind regarding this acknowledgement, please provide those.

Response No. TIEC 14-3:

SWEPCO does not maintain records of each and every instance where SPP acknowledged the referenced possible exceptions to including the load served by BTMG in the transmission billing determinants. Furthermore, it is not possible for SWEPCO to provide information about meetings between SPP and other members where SWEPCO was not in attendance. Please see the company's response to TIEC 6-3.

Prepared By: C. Richard Ross

Title: Dir Trans RTO Policy

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Question No. TIEC 14-4:

With respect to Mr. Ross's statement on page 12, lines 7-10 that SWEPCO has not included loads because the generation and associated loads are not synchronized, please explain in detail how whether or not generation is synchronized affects the extent to which the associated BTMG load imposes demands on the SWEPCO system and why loads not associated with synchronous generation should be excluded from SWEPCO's calculation of Network Load.

Response No. TIEC 14-4:

Generation and load not synchronized with the SPP system can neither inject nor withdraw power and energy from the system. The loss of the generation in such situations, since there is no electrical path connecting it to the SPP system, would not affect the demands on the SPP system, are not required to be included in the company's transmission billing submittal.

Prepared By: C. Richard Ross

Title: Dir Trans RTO Policy

Sponsored By: C. Richard Ross

Title: Dir Trans RTO Policy