



Control Number: 52199



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SOAH DOCKET NO. 473-21-2531
PUC DOCKET NO. 52199

2021 JUN 30 AM 10:01

APPLICATION OF AEP TEXAS INC.	§	BEFORE THE STATE OFFICE
TO ADJUST ITS ENERGY	§	OF
EFFICIENCY COST RECOVERY	§	ADMINISTRATIVE HEARINGS
FACTOR AND RELATED RELIEF	§	

CITIES SERVED BY AEP TEXAS INC.'S
FIRST REQUEST FOR INFORMATION TO AEP TEXAS INC.

Cities Served by AEP Texas Inc. (Cities), file this First Request for Information to AEP Texas Inc. (AEP Texas or Company) in the above-styled docket. AEP Texas is hereby requested to furnish one copy of all items of information enumerated on the attached sheets directly to the undersigned attorney at the offices of Lloyd Gosselink Rochelle & Townsend, P.C., 816 Congress Avenue, Suite 1900, Austin, Texas 78701, within ten (10) calendar days in accordance with SOAH Order No. 1 and SOAH Order No. 2. These requests shall be deemed continuing so as to require further and supplemental responses if AEP Texas receives or generates additional information within the scope of these requests between the time of the original response and the time of the hearings. Also, where data is requested, provide it in hard copy and Excel format.

DEFINITIONS AND INSTRUCTIONS

A. "AEP Texas Inc." or "AEP Texas" refers to its parents, affiliates and subsidiaries, and any person acting or purporting to act on its behalf, including without limitation, attorneys, agents, advisors, investigators, representatives, employees or other persons.

B. The term "document" shall have the broadest meaning possible under the Texas Rules of Civil Procedure and shall include, but not be limited to, the original (or a copy when the original is not available), each non-identical copy (including those which are non-identical by reason of notations or marking, or by appearing in the files of a separate person), and any books, notebooks, pamphlets, periodicals, letters, reports, memoranda, handwritten notes, notations, messages, telegrams, wires, cables, press or news wire releases, records, studies, analyses, summaries, magazines, booklets, circulars, catalogs, bulletins, instructions, operating or maintenance manuals, operating or product specifications, fabrication sheets, test data, design specifications, parts lists, calendars, day-timers, notes or records of meetings, notices, purchase orders, bills, ledgers, checks, tabulations, questionnaires, surveys, drawings, sketches, schematics, blueprints, flow sheets, working papers, charts, graphs, indices, tapes, agreements, releases, appraisals, valuations, estimates, opinions, financial statements, accounting records, income statements, photographs, films or videotapes, back-up tapes, minutes, contracts, leases, invoices, records of purchase or sale, correspondence, electronic or other transcription or tapings of or notes

pertaining to telephone or personal conversations or conferences, tape recordings, electromagnetic recordings, voice mail message or transcriptions thereof, interoffice communications of all types, e-mail messages, printouts of e-mail messages, instant messages or printouts thereof, microfilms, electronic databases, CDs, DVDs, videotapes or cassettes, films, movies, computer printouts and any and all other written, printed, typed, punched, engraved, taped, filmed, recorded (electronically or otherwise), labeled, or graphic matter, of whatever description, however produced or reproduced (including computer-stored or generated data, together with instructions or programs necessary to search and retrieve such data), and shall include all attachments to (including tangible things) and enclosures with (including tangible things) any requested item, to which they are attached or with which they are enclosed, and each draft thereof. A draft of a non-identical copy is a separate document within the meaning of this term. An electronic copy of a paper documents is a separate document within the meaning of this term.

C. Pursuant to Tex. R. Civ. P. 196.4, Cities specifically request that any electronic or magnetic data (which is included in the definition of “document”) that is responsive to a request herein be produced on CD-Rom in a format that is compatible with Microsoft Office and/or Word Perfect and be produced with your response to these requests. Cities further request that TNMP produce electronic copies of all paper documents, including any metadata attached to such documents, and produce all electronic originals or all responsive documents.

D. The terms “and” and “or” shall be construed both disjunctively and conjunctively as necessary to make the request inclusive rather than exclusive.

E. “Each” shall be construed to include the word “every” and “every” shall be construed to include the word “each.”

F. “Any” shall be construed to include “all” and “all” shall be construed to include “any.”

G. The term “concerning,” or one of its inflections, includes the following meanings: relating to; referring to; pertaining to; regarding; discussing; mentioning; containing; reflecting; evidencing; describing; showing; identifying; providing; disproving; consisting of; supporting; contradicting; in any way legally, logically or factually connected with the matter to which the term refers; or having a tendency to prove or disprove the matter to which the term refers.

H. The term “including,” or one of its inflections, means and refers to “including but not limited to.”

I. Words used in the plural shall also be taken to mean and include the singular. Words used in the singular shall also be taken to mean and include the plural.

J. The present tense shall be construed to include the past tense, and the past tense shall be construed to include the present tense.

K. 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 or copies, subject matter of the document, and the basis upon which such privilege is claimed.

L. Pursuant to 16 Tex. Admin. Code § 22.144(h)(4), if the response to any request is voluminous, please provide a detailed index of the voluminous material.

M. If the information requested is included in previously furnished exhibits, workpapers, 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.

Respectfully submitted,

**LLOYD GOSSELINK ROCHELLE
& TOWNSEND, P.C.**

816 Congress Avenue, Suite 1900

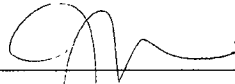
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ATTORNEYS FOR CITIES SERVED
BY AEP TEXAS INC.

CERTIFICATE OF SERVICE

I certify that notice of the filing of this document was provided to all parties of record via electronic mail on June 30, 2021, in accordance with the Order Suspending Rules, issued in Project No. 50664.



JAMIE L. MAULDIN

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CITIES' FIRST RFI TO AEP TEXAS INC.

- Cities 1-1 Refer to the Direct Testimony of Brian T. Lysiak at 9, Tables 1 and 2. Please explain why the North Division's Costs from the Central Division as a percentage of total costs in 2020 were four times greater than the Central Division's Costs from the North Division as a percentage of total costs. Please describe the services that the Central Division provides to the North Division, and the services that the North Division provides to the Central Division.
- Cities 1-2 Please provide workpapers supporting the values on Schedule D, in Excel format.
- Cities 1-3 Refer to Schedule H. Please provide AEP Texas' monthly kWh by EECRF rate class by Division for the period January 2019 through December 2022, in Excel format. Identify which months are actual and which are forecast.
- Cities 1-4 Refer to Schedule I. Please provide by EECRF rate class by Division the source or calculation for the 2020 Billing Units Adjusted for Base Rate Credit Units, in Excel format.
- Cities 1-5 Refer to Schedule I. Please provide by month by EECRF rate class by Division the 2020 EE Base Revenue, in Excel format.
- Cities 1-6 Please provide workpapers supporting the values on Schedules P-1 and P-2, in Excel format.