



Control Number: 52199



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Addendum StartPage: 0

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

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FILED

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

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

JULY 12, 2021

TABLE OF CONTENTS

<u>SECTION</u>	<u>FILE NAME</u>	<u>PAGE</u>
Response No. Cities 1-1	52199 CITIES01 Pkg.pdf	2
Attachment 1 to Response No. Cities 1-1	52199 CITIES01 Pkg.pdf	3
Attachment 2 to Response No. Cities 1-1	52199 CITIES01 Pkg.pdf	4
Response No. Cities 1-2	52199 CITIES01 Pkg.pdf	5
Response No. Cities 1-3	52199 CITIES01 Pkg.pdf	6
Attachment 1 to Response No. Cities 1-3	Cities 1-3 Attachment 1.xlsx	7
Response No. Cities 1-4	52199 CITIES01 Pkg.pdf	8
Attachment 1 to Response No. Cities 1-4	Cities 1-4 Attachment 1.xlsx	9
Response No. Cities 1-5	52199 CITIES01 Pkg.pdf	14
Response No. Cities 1-6	52199 CITIES01 Pkg.pdf	15

Files provided electronically via the PUC Interchange

Cities 1-3 Attachment 1.xlsx
Cities 1-4 Attachment 1.xlsx
52199 CITIES01 Pkg.pdf

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

**AEP TEXAS INC.'S RESPONSE TO CITIES SERVED BY
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Question No. 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.

Response No. Cities 1-1:

North Division's Costs from the Central Division as a percentage of total costs in 2020 were greater than the Central Division's Costs from the North Division as a percentage of total costs due to more direct billings by the Central Division to the North Division, as referenced in Exhibit BTL-4.

Please see Cities 1-1 Attachment 1 for the details related to the 2020 costs charged between the Central and North Division shown in AEP Texas Central Schedule K. Please see Cities 1-1 Attachment 2 for the details related to the 2020 costs charged between the Central and North Division shown in AEP Texas North Schedule K. Please see the Direct Testimony of Brian Lysiak for a description of how work orders have been established for billing of specific projects, how these work orders have approved benefiting locations (which determine what AEP business units to be billed) and allocation factors (which determine how the costs are allocated among the AEP business units billed). Exhibit BTL-2 lists the benefiting locations and allocation factors assigned to the work orders included in the Central Division's Energy Efficiency Costs charged from the North Division. Exhibit BTL-4 lists the benefiting locations and allocation factors assigned to the work orders included in the North Division's Energy Efficiency Costs charged from the Central Division.

Prepared By: Brian T. Lysiak

Title: Accounting Sr Mgr

Sponsored By: Brian T. Lysiak

Title: Accounting Sr Mgr

AEP Texas Central Division Costs - 2020
FERC Account 907 - Supervision

To Project	To Work Order	Class of Service	Primary Activities or Products	From BU Grouping	Total
EON100512 DSM-C&I Standard Offer - TX	UTXC006801 DSM C&I Stndrd Offer-TNC/TCC D	Utility Operations	721 Manage Demand Side Progs-Plans	AEP Texas North Division	861
EON100535 EE/DR R&D - TX	UTXC008901 DSM R&D-Programs TCC/TNC-D	Utility Operations	317 PARTICIPATE IN TRNG/LEARNING	AEP Texas North Division	1,534
		Utility Operations	721 Manage Demand Side Progs-Plans	AEP Texas North Division	25,697
EON100547 DSM - EM&V - TX	UTXC011401 DSM EM&V - TCC/TNC D	Utility Operations	290 MGE/PART IN REGULATORY AFFRS	AEP Texas North Division	333
		Utility Operations	721 Manage Demand Side Progs-Plans	AEP Texas North Division	256
EON100551 EE/DR EECRF	UTXC012701 EE/DR EECRF TCC/TNC-D	Utility Operations	280 PREPARE RATE CASE FILINGS	AEP Texas North Division	18,263
TXDSMANDA Texas DSM Admin & General	UTXC007901 DSM Texas General Admin -TCC D	Utility Operations	721 Manage Demand Side Progs-Plans	AEP Texas North Division	254
TXDSMANDA Texas DSM Admin & General	UTXC008201 DSMTexasGeneralAdmin-TCC/TNC D	Utility Operations	286 PREP OTH NON-RATE CASE FILNGS	AEP Texas North Division	10,598
		Utility Operations	290 MGE/PART IN REGULATORY AFFRS	AEP Texas North Division	443
		Utility Operations	317 PARTICIPATE IN TRNG/LEARNING	AEP Texas North Division	2,384
		Utility Operations	322 DEV/MGE/ADMINSTR SAFETY PROGS	AEP Texas North Division	1,818
		Utility Operations	721 Manage Demand Side Progs-Plans	AEP Texas North Division	120,015
Grand Total					182,456

AEP Texas North Division Costs - 2020
FERC Account 907 - Supervision

To Project	To Work Order	Class of Service	Primary Activities or Products	From BU Grouping	Total
EON100508 DSM-Res Standard Offer - TX	UTXC002201 DSM Res Stndrd Offer-TNC D	Utility Operations	721 Manage Demand Side Progs-Plans	AEP Texas Central Division	28,716
EON100514 DSM-Hard To Reach SOP - TX	UTXC001501 DSM HardtoReach Std Offr-TNC D	Utility Operations	721 Manage Demand Side Progs-Plans	AEP Texas Central Division	38,782
EON100522 DSM-Low Income Weatherization	UTXC003401 DSM LowIncWeathPrg - TNC D	Utility Operations	721 Manage Demand Side Progs-Plans	AEP Texas Central Division	19,222
EON100534 DSM Solar PV Pilot MTP	UTXC008401 DSM Solar PV Pilot MTP - TNC D	Utility Operations	721 Manage Demand Side Progs-Plans	AEP Texas Central Division	13,944
EON100535 EE/DR R&D - TX	UTXC008901 DSM R&D-Programs TCC/TNC-D	Utility Operations	721 Manage Demand Side Progs-Plans	AEP Texas Central Division	17,211
EON100547 DSM - EM&V - TX	UTXC011401 DSM EM&V - TCC/TNC D	Utility Operations	280 MGE/PART IN REGULATORY AFFRS	AEP Texas Central Division	983
			721 Manage Demand Side Progs-Plans	AEP Texas Central Division	11,928
EON100551 EE/DR EECRF	UTXC012701 EE/DR EECRF TCC/TNC-D	Utility Operations	280 PREPARE RATE CASE FILINGS	AEP Texas Central Division	39
TXDSMANDA Texas DSM Admin & General	UTXC008201 DSMTexasGeneralAdmin-TCC/TNC D	Utility Operations	260 MGE/SUPP DISTRIBUTION BUSINESS	AEP Texas Central Division	24
			261 MGE/SUPP CUSTOMER SERV BUSINES	AEP Texas Central Division	1,264
			280 PREPARE RATE CASE FILINGS	AEP Texas Central Division	1,439
			286 PREP OTH NON-RATE CASE FILNGS	AEP Texas Central Division	209
			290 MGE/PART IN REGULATORY AFFRS	AEP Texas Central Division	248
			317 PARTICIPATE IN TRNG/LEARNING	AEP Texas Central Division	2,707
			322 DEV/MGE/ADMINSTR SAFETY PROGS	AEP Texas Central Division	248
			366 ORDER MATLS/EQPMT/SUPPLIES	AEP Texas Central Division	8
			721 Manage Demand Side Progs-Plans	AEP Texas Central Division	40,417
TXDSMANDA Texas DSM Admin & General	UTXC008001 DSM Texas General Admin -TNC D	Utility Operations	721 Manage Demand Side Progs-Plans	AEP Texas Central Division	810
Grand Total					178,199

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**AEP TEXAS INC.'S RESPONSE TO CITIES SERVED BY
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Question No. Cities 1-2:

Please provide workpapers supporting the values on Schedule D, in Excel format.

Response No. Cities 1-2:

Please see Item No. 13 in Docket No. 52199 on the PUC Interchange for the information sought in this request.

Prepared By: Robert Cavazos

Prepared By: Pamela D. Osterloh

Sponsored By: Robert Cavazos

Sponsored By: Pamela D. Osterloh

Title: EE & Consumer Programs Mgr

Title: EE&Cons Prog Compl Coord Prin

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**AEP TEXAS INC.'S RESPONSE TO CITIES SERVED BY
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Question No. 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.

Response No. Cities 1-3:

Please see Cities 1-3 Attachment 1 for the requested kWh information.

Prepared By: Jennifer L. Jackson

Title: Reg Pricing & Analysis Mgr

Sponsored By: Jennifer L. Jackson

Title: Reg Pricing & Analysis Mgr

AEP Texas EECRF Filing - Docket No. 52199 - kWh By Class

Rate Classes	North 2019 Actual Billing Units	Central 2019 Actual Billing Units	AEPTX 2019 Actual Billing Units
Residential	1,895,927,376	10,131,226,662	12,027,154,038
Secondary <= 10 kW	140,423,525	466,344,124	606,767,649
Secondary > 10 kW	1,857,022,753	7,362,178,696	9,219,201,449
Primary	1,898,193,424	2,758,346,815	4,656,540,239
Transmission	247,000,436	4,967,689,071	5,214,689,507
Lighting	39,644,360	222,051,331	261,695,691
Total	6,078,211,874	25,907,836,699	31,986,048,573

Rate Classes	North 2020 Actual Billing Units	Central 2020 Actual Billing Units	AEPTX 2020 Actual Billing Units
Residential	1,896,462,462	10,233,246,315	12,129,708,777
Secondary <= 10 kW	143,116,608	500,187,501	643,304,109
Secondary > 10 kW	1,646,875,626	6,835,104,253	8,481,979,879
Primary	1,736,061,251	2,722,494,617	4,458,555,868
Transmission	642,423,812	5,484,913,290	6,127,337,102
Lighting	38,971,485	216,622,960	255,594,445
Total	6,103,911,244	25,992,568,936	32,096,480,180

Rate Classes	North 2021 Forecasted Billing Units	Central 2021 Forecasted Billing Units	AEPTX 2021 Forecasted Billing Units
Residential	1,907,833,327	10,237,779,615	12,145,612,942
Secondary <= 10 kW	139,668,508	471,038,993	610,707,501
Secondary > 10 kW	1,864,500,444	7,434,351,440	9,298,851,884
Primary	1,887,041,323	2,593,037,642	4,480,078,965
Transmission	248,551,537	5,019,935,650	5,268,487,187
Lighting	39,893,317	224,386,707	264,280,024
Total	6,087,488,456	25,980,530,047	32,068,018,503

Rate Classes	North 2022 Forecasted Billing Units	Central 2022 Forecasted Billing Units	AEPTX 2022 Forecasted Billing Units
Residential	1,902,725,281	10,671,127,161	12,573,852,442
Secondary <= 10 kW	142,508,551	521,277,376	663,785,927
Secondary > 10 kW	1,648,881,306	7,124,869,969	8,773,751,275
Primary	1,723,277,776	2,646,071,825	4,369,349,601
Transmission	644,545,333	5,719,612,856	6,364,158,189
Lighting	39,100,183	225,892,261	264,992,444
Total	6,101,038,430	26,908,851,448	33,009,889,878

Forecasted Billing Units have Customer ID Notice kWh removed.

Actual Billing units include all kWh.

Transmission and Lighting class kWh are not used in EECRF billing.

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PUC DOCKET NO. 52199**

**AEP TEXAS INC.'S RESPONSE TO CITIES SERVED BY
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Question No. 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.

Response No. Cities 1-4:

Please see Cities 1-4 Attachment 1 for the requested calculation.

Prepared By: Jennifer L. Jackson

Title: Reg Pricing & Analysis Mgr

Sponsored By: Jennifer L. Jackson

Title: Reg Pricing & Analysis Mgr

AEP Texas, Inc.
Adjusted Energy Efficiency Cost Recovery - Base Revenue

Schedule C
Energy Efficiency Program Costs Included in Base Rates

Docket No. 33309 TCC Commission Staff's Final Number Run
33309 TCC Dist Model re-run 010908

Central Division

Class	Distribution - FERC Account 907	Distribution Function Allocator	Customer Service - FERC Account 907	Customer Service Function Allocator	Total Energy Efficiency in Base Rates	Docket No. 33309 Billing Data	Base Distribution Billing Unit	Docket No. 33309 EE Rate per Billing Unit
Residential	\$2,948,779	47.209%	\$75,656	85.323%	\$3,024,435	8,352,353,434	kWh	\$0.000362
Secondary <= 10 kW	\$107,362	1.719%	\$6,725	7.5848%	\$114,088	398,752,267	kWh	\$0.000286
Secondary > 10 kW IDR	\$126,356	2.023%	\$24	0.0269%	\$126,379	1,421,383	kW	\$0.078608
Secondary > 10 kW Non-IDR	\$1,825,465	29.225%	\$6,118	6.9001%	\$1,831,583	23,486,386	kW	\$0.078608
Primary IDR	\$609,991	9.766%	\$37	0.0419%	\$610,028	5,776,539	kW	\$0.105418
Primary Non-IDR	\$65,439	1.048%	\$23	0.0257%	\$65,462	631,219	kW	\$0.105418
Transmission	\$562,887	9.012%	\$5	0.0060%	\$562,892	13,980,065	kW	\$0.040264
Lighting	\$0	0.000%	\$81	0.0915%	\$81	229,634,991	kWh	\$0.000000
Total	\$6,246,279	100.000%	\$88,670		\$6,334,949			

AEP Texas, Inc.
Adjusted Energy Efficiency Cost Recovery - Base Revenue

Schedule C
Energy Efficiency Program Costs Included in Base Rates

Docket No. 33310 Final Order

North Division

Class	Distribution - FERC Account 907	Distribution Function Allocator	Customer Service - FERC Account 907	Customer Service Function Allocator	Total Energy Efficiency in Base Rates	Docket No. 33310 Billing Data	Base Distribution Billing Unit	Docket No. 33310 EE Rate per Billing Unit
Residential	\$602,129	46.553%	\$783.7	77.215%	\$602,913	1,713,078,230	kWh	\$0.000352
Secondary <= 10 kW	\$37,472	2.897%	\$148.5	14.628%	\$37,620	146,926,027	kWh	\$0.000256
Secondary > 10 kW IDR	\$77,527	5.994%	\$8.5	0.841%	\$77,536	982,774	kW	\$0.067725
Secondary > 10 kW Non-IDR	\$399,266	30.869%	\$66.9	6.592%	\$399,333	6,058,441	kW	\$0.067725
Primary IDR	\$160,223	12.388%	\$4.1	0.400%	\$160,227	2,081,550	kW	\$0.076100
Primary Non-IDR	\$9,045	0.699%	\$1.4	0.135%	\$9,046	142,816	kW	\$0.076100
Transmission	\$7,753	0.599%	\$0.8	0.083%	\$7,754	443,710	kW	\$0.017474
Lighting	\$0	0.000%	\$1.1	0.107%	\$1	57,913,901	kWh	\$0.000000
Total	\$1,293,415	100.000%	\$1,015	100.000%	\$1,294,430			

AEP Texas, Inc
Adjusted Energy Efficiency Cost Recovery - Base Revenue

Central Division Rate Class	Billing Unit	Actual January	Actual February	Actual March	Actual April	Actual May	Actual June	Actual July	Actual August	Actual September	Actual October	Actual November	Actual December*	Total 2020
Residential	kWh	693,434,870	580,275,536	603,106,779	708,653,040	858,849,824								3,444,520,049
* Secondary <= 10 kW	kWh	36,705,017	34,084,136	35,590,846	36,568,403	39,193,544								162,142,246
* Secondary > 10 kW IDR	Distribution kW	185,879	187,846	193,201	194,682	187,813.1								959,520.40
* Secondary > 10 kW Non-IDF	Distribution kW	2,147,670	2,127,180	2,112,511	2,064,208	2,081,972								10,533,540.10
* Primary IDR	Distribution kW	520,442	497,115	551,277	517,589	528,241								2,614,663.91
* Primary Non-IDR	Distribution kW	42,945	40,942	41,854	47,103	48,213								221,056.70
Transmission	Distribution kW	1,578,644	1,232,297	1,819,737	1,502,249	1,390,312								7,323,237.60
Lighting	kWh	18,437,926	18,278,510	18,570,186	18,550,672	18,735,214								82,572,488

* remove opt out customer ID notice customers from secondary and primary billing units as of March 2017
*added Sharyland rate codes

North Division Rate Class	Billing Unit	Actual January	Actual February	Actual March	Actual April	Actual May	Actual June	Actual July	Actual August	Actual September	Actual October	Actual November	Actual December	Total 2020
Residential	kWh	161,804,804	147,604,086	129,412,143	109,859,561	134,464,197								683,144,791
* Secondary <= 10 kW	kWh	12,441,173	11,081,713	10,805,826	9,568,997	9,939,127.0								53,836,836
* Secondary > 10 kW IDR	Distribution kW	118,381	107,560	93,013.1	91,566.0	92,993.5								503,512.70
* Secondary > 10 kW Non-IDF	Distribution kW	514,298	514,736	507,775.70	499,088.72	511,523.40								2,547,421.14
* Primary IDR	Distribution kW	288,946	281,066	294,839.2	287,264.0	292,910.5								1,445,025.36
* Primary Non-IDR	Distribution kW	30,632	31,603	29,874.9	26,845.0	24,593.7								143,348.47
Transmission	Distribution kW	103,612	111,702	116,204.3	198,835.9	203,255.2								733,609.30
Lighting	kWh	3,277,368	3,282,335	3,273,097	3,274,716	3,302,728								16,410,244

* remove opt out customer ID notice customers from secondary and primary billing units as of March 2017

AEP Texas, Inc.
Adjusted Energy Efficiency Cost Recovery - Base Revenue

CENTRAL DIVISION		2020												Total 2020	
Rate Class	Actual January	Actual February	Actual March	Actual April	Actual May	Actual June	Actual July	Actual August	Actual September	Actual October	Actual November	Actual December			
Residential	251,023	210,060	218,325	258,605	310,904	-	-	-	-	-	-	-	1,248,918		
Secondary <= 10 kW	10,498	9,748	10,179	10,458	11,209	-	-	-	-	-	-	-	52,093		
Secondary > 10 kW IDR	14,812	14,768	15,187	15,304	15,558	-	-	-	-	-	-	-	75,425.88		
Secondary > 10 kW Non-IDR	168,824	167,213	168,060	162,263	163,660	-	-	-	-	-	-	-	828,020.52		
Primary IDR	54,884	52,405	58,115	54,563	55,686	-	-	-	-	-	-	-	275,832.85		
Primary Non-IDR	4,527	4,318	4,412	4,966	5,083	-	-	-	-	-	-	-	23,303.35		
Transmission	83,563	49,817	65,217	60,487	55,880	-	-	-	-	-	-	-	294,882.84		
Total Base EE Adj. Revenue	567,910	508,125	537,495	564,845	618,078	-	-	-	-	-	-	-	2,796,254		
Base Rate	527,912	527,912	527,912	527,912	527,912	-	-	-	-	-	-	-	2,839,562		
Over/(Under)	39,998	(19,787)	9,582	36,733	90,166	-	-	-	-	-	-	-	156,692	5.9%	
NORTH DIVISION		Actual January	Actual February	Actual March	Actual April	Actual May	Actual June	Actual July	Actual August	Actual September	Actual October	Actual November	Actual December	Total 2020	
Residential		56,955	51,957	45,553	38,671	47,331	-	-	-	-	-	-	-	240,487	
Secondary <= 10 kW		3,185	2,837	2,766	2,450	2,544	-	-	-	-	-	-	-	13,782	
Secondary > 10 kW IDR		8,017	7,284	6,299	6,201	6,298	-	-	-	-	-	-	-	34,100.39	
Secondary > 10 kW Non-IDR		34,831	34,860	34,389	33,801	34,643	-	-	-	-	-	-	-	172,524.09	
Primary IDR		21,889	21,389	22,437	21,861	22,290	-	-	-	-	-	-	-	109,966.43	
Primary Non-IDR		2,331	2,405	2,273	2,028	1,872	-	-	-	-	-	-	-	10,908.82	
Transmission		1,811	1,952	2,031	3,474	3,552	-	-	-	-	-	-	-	12,819.09	
Total Base EE Adj. Revenue		129,119	122,865	115,749	108,485	118,530	-	-	-	-	-	-	-	594,568	
Base Rate		107,869	107,869	107,869	107,869	107,869	-	-	-	-	-	-	-	539,346	
Over/(Under)		21,250	14,815	7,880	616	10,661	-	-	-	-	-	-	-	55,222	10.2%

AEP Texas, Inc.
Adjusted Energy Efficiency Cost Recovery - Base Revenue

Central		Unit	January	February	March	April	May	June	July	August	September	October	November	December
827	Sec<10	kWh	1,678	1,399	2,203	1,538	1,434							
829	Sec<10	kWh	10,734	9,510	10,315	7,133	9,231							
855	Sec>10 non-IDR	kW	60.17	60.17	60	60	60							
857	Sec>10 non-IDR	kW	1,330.40	752.47	797.25	756.41	789							
842	Primary IDR	kW	19,262.74	20,783.93	20,926.79	21,295.51	20,568							
North		Unit	January	February	March	April	May	June	July	August	September	October	November	December
829	Sec<10	kWh	93,750	81,055	88,008	72,813	50,078							
836	Sec>10 non-IDR	kW	504.10	523.88	532	562	523							
837	Sec>10 IDR	kW	-	-	-	-	-							
841	Primary non-IDR	kW	2,703.68	2,814.98	2,389.49	2,475.95	1,621							
842	Primary IDR	kW	2,435.09	2,421.16	3,203.68	3,127.73	3,835							

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**AEP TEXAS INC.'S RESPONSE TO CITIES SERVED BY
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Question No. 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.

Response No. Cities 1-5:

Please see Cities 1-4 Attachment 1.

Prepared By: Jennifer L. Jackson

Title: Reg Pricing & Analysis Mgr

Sponsored By: Jennifer L. Jackson

Title: Reg Pricing & Analysis Mgr

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

Question No. Cities 1-6:

Please provide workpapers supporting the values on Schedules P-1 and P-2, in Excel format.

Response No. Cities 1-6:

Please see Item No. 13 in Docket No. 52199 on the PUC Interchange for the information sought in this request.

Prepared By: Robert Cavazos
Prepared By: Pamela D. Osterloh

Title: EE & Consumer Programs Mgr
Title: EE&Cons Prog Compl Coord Prin

Sponsored By: Robert Cavazos
Sponsored By: Pamela D. Osterloh

Title: EE & Consumer Programs Mgr
Title: EE&Cons Prog Compl Coord Prin