



## Filing Receipt

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**SOAH DOCKET NO. 473-22-9196**  
**PUC DOCKET NO. 53267**

<b>APPLICATION OF AEP TEXAS INC.</b>	<b>§</b>	<b>BEFORE THE STATE OFFICE</b>
<b>FOR APPROVAL OF A WHOLESALE</b>	<b>§</b>	
<b>DISTRIBUTION SERVICE</b>	<b>§</b>	<b>OF</b>
<b>DISTRIBUTED GENERATION</b>	<b>§</b>	
<b>ENERGY STORAGE TARIFF</b>	<b>§</b>	<b>ADMINISTRATIVE HEARINGS</b>

**HUNT ENERGY NETWORK, L.L.C.’S**  
**FIRST SET OF REQUESTS FOR INFORMATION TO**  
**AEP TEXAS INC.**

Hunt Energy Network L.L.C. (“HEN”) requests that AEP Texas Inc. (“AEP Texas”) fully respond to the attached set of requests for information (“RFIs”) within twenty (20) days, as required by 16 Texas Administrative Code (“TAC”) § 22.144.

Responses to these RFIs shall conform in all respects to the Commission’s rules, including the requirement in 16 TAC § 22.144(c)(2)(F) that they be made under oath. Responses shall identify the preparer or person under whose direct supervision each response was prepared, and the sponsoring witness, if any. Each request shall be answered separately; responses shall be preceded by the request to which the answer pertains.

Any information responsive to and any questions regarding these requests should be directed to the undersigned.

Respectfully Submitted,

\_\_\_\_\_  
/s/ Jeffrey B. Stuart  
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*Attorneys for Hunt Energy Network, L.L.C.*

**CERTIFICATE OF SERVICE**

I certify that a true and correct copy of this pleading has been forwarded to all parties of record via electronic mail on October 12, 2022, in accordance with the Order Suspending Rules, issued in Project No. 50664.

/s/ Sarah Merrick

Sarah K. Merrick

## **HEN'S FIRST REQUEST FOR INFORMATION TO AEP**

### **General Instructions**

1. In responding to each request, please provide information available from all corporate and individual files, as well as from all past and present employees, officers, and board members and all predecessors and affiliates, as defined below.
2. These requests are continuing in nature, and require supplemental responses in accordance with 16 TAC § 22.144(i).
3. If any information is not available in the exact form requested, provide whatever information or documents that best respond to the request.
4. If the requested information or data is available for only part of the period requested or are otherwise incomplete, please provide such data as is available.
5. If any request appears unclear or ambiguous, please contact counsel for HEN as soon as possible to obtain clarification.
6. Each document of more than one page should be stapled or otherwise bound, and the individual pages numbered consecutively.
7. If, in the case of any request seeking documents, there are no responsive documents, so state and provide a narrative answer to the request.
8. The terms "and" and "or" should be construed either disjunctively or conjunctively whenever appropriate in order to bring within the scope of each request information or documents which might otherwise be considered to be beyond its scope.
9. The singular form of a word should be interpreted as plural, and the plural form of a word should be interpreted as singular, whenever appropriate, in order to bring within the scope of each RFI information or documents that might otherwise be considered to be beyond its scope.
10. When the recipient of the RFI is requested to provide a study, schedule, or analysis, it should also provide the workpapers, underlying facts, inferences, suppositions, estimates, and conclusions necessary to support each study, schedule, or analysis.
11. If the actual data is unavailable, but estimates or approximations are available, provide the estimates or approximations that are the best available information and explain the procedure for developing the information supplied.
12. Pursuant to Rule 196.4 of the Texas Rules of Civil Procedure, HEN specifically request that any electronic or magnetic information (which is included in the definition of "document") that is responsive to a request herein be produced in a format that is

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compatible with Adobe Acrobat, Microsoft, and/or Macintosh and be produced with your response to these requests. If emails are responsive to these requests, please provide a searchable pdf copy of the entire email string. Attachments to emails should be provided with the email in searchable pdf form, unless it is stored in a different format, in which case the attachment should be produced in its native format.

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## **HEN'S FIRST REQUEST FOR INFORMATION TO AEP**

### **Definitions**

1. "AEP Texas Inc." ("AEP Texas") refers to, for purposes of these RFIs, AEP Texas and its employees, members, officers, directors, agents, attorneys, consultants, and all persons acting under contractual arrangements with, or purporting to act on its behalf.
2. A reference to "HEN" shall mean Hunt Energy Network, L.L.C.
3. "Date" shall mean the exact day, month and year if ascertainable, or if not, the best approximation thereof in relation to other events.
4. To "describe," "detail," or "state" shall mean to relate as completely as possible each and every act, omission, incident, event, condition, circumstance, or thing relating directly or indirectly to the subject of the description, including all pertinent dates. These terms call for answers independent from any documents that are required in response to requests. Such answers should be in a form (*e.g.*, narrative, tabular, etc.) appropriate to a complete response to the request.
5. The terms "document" or "documents" are used in their broadest sense to include, by way of illustration and not limitation, all written or graphic matter of every kind and description whether printed, produced or reproduced by any process whether visually, magnetically, mechanically, electronically or by hand, whether final or draft, original or reproduction, whether or not claimed to be privileged or otherwise excludable from discovery, and whether or not in your actual or constructive possession, custody, or control. The terms include writings, correspondence, telegrams, memoranda, studies, reports, surveys, statistical compilations, notes, calendars, tapes, computer disks, data on computer drives, email, cards, recordings, contracts, agreements, invoices, licenses, diaries, journals, accounts, pamphlets, books, ledgers, publications, microfilm, microfiche and any other data compilations from which information can be obtained and translated, by you if necessary, into reasonably usable form. "Document" or "documents" shall also include every copy of a document where the copy contains any commentary or notation of any kind that does not appear on the original or any other copy.
6. "Each" shall be construed to include the word "every" and "every" shall be construed to include the word "each."
7. To "explain" means to make known in detail, to make clear the cause or reason of and account for each act, omission, incident, event, condition, circumstance, decision, and/or thing relating directly or indirectly to the subject of the explanation including all pertinent dates. This term calls for answers independent from any documents that are required in response to requests. Such answers should be in a form (*e.g.*, narrative, tabular, etc.) appropriate to a complete response to the request.
8. To "identify" a person means to include his or her full name, including middle name or initial, his or her employer or other organizational affiliation at the date of the relevant

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transaction or event and at the present, his or her title and duties in the company or other organization with which he or she was then affiliated and is now affiliated, and his or her last known business address and telephone number, or if not available, last known residence address and telephone number.

9. "Identification" of, or to "identify," a document means to provide facts sufficient to establish the identity of the document or other thing(s) at issue, such as (a) the type or nature of the document (*e.g.*, letter, memorandum, corporate minutes), (b) the data, 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 wrote, dictated, or otherwise participated in the writing of the document, (h) the identity of each person who signed or initialed the document, (i) the identity of each person to whom the document was addressed, (j) the present location of the document; and (k) the identity of each person having custody of, or control over, the document. Identification of the document includes identifying all documents known or believed to exist, whether or not in the custody of its attorneys or other representatives. The final version and each draft of each document should be identified and produced separately. If a document is no longer in your possession or control, state what disposition was made of it. A document need not be identified if it is produced.
10. The term "including," or one of its inflections, means and refers to "including but not limited to."
11. "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, cooperative, municipality, commission, or governmental body or agency.
12. "Relating to" or "relates to" means comprising, embodying, addressing, presenting, discussing, concerning, referring to, pertaining to, regarding, containing, reflecting, evidencing, describing, showing, identifying, providing, disproving, consisting of, supporting, contradicting, commenting upon, analyzing, or mentioning in any way.

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## **HEN'S FIRST REQUEST FOR INFORMATION TO AEP**

### **HEN 1-1**

Please provide the class cost of service study from AEP Texas's last rate case (test year ending December 31, 2018).

### **HEN 1-2**

When does AEP Texas anticipate filing its next base rate case?

### **HEN 1-3**

Refer to Jennifer L. Jackson's direct testimony at page 6, line 21 through page 7, line 1. Please explain why the referenced class cost of service study does not contain the data necessary to develop separate pricing.

- a. Please explain what data is necessary that is not included in the class cost of service study.
- b. As part of your response, please explain if AEP Texas currently has the data necessary to develop separate pricing. If not, please explain why not.

### **HEN 1-4**

Does AEP Texas plan to file an application to update its WDS DG rate once it has the necessary data? If yes, please provide the estimated filing date. If not, please explain why not.

### **HEN 1-5**

Does AEP Texas believe that a direct assignment approach for WDS DG rates would more accurately reflect cost-causation? Please explain your response.

### **HEN 1-6**

Does AEP Texas believe that WDS DG facilities utilize AEP Texas's distribution system in the same manner as primary service customers? Please explain.

### **HEN 1-7**

Does AEP Texas believe that WDS DG facilities impose costs on AEP Texas's distribution system in the same manner as primary service customers? Please explain.

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### **HEN 1-8**

Please identify the number of customers that take service under the Primary Voltage Service retail rate schedule. Please identify the number of customers that take (i) single phase and (ii) three-phase service.

### **HEN 1-9**

Does AEP Texas believe that all of the costs included in its last class cost of service study for the primary class are costs that are also caused by WDS DG customers? If not, please identify the costs allocated to the primary service class that are not caused by WDS DG customers. If yes, please explain.

### **HEN 1-10**

Please refer to Jennifer L. Jackson's testimony at page 6, line 6. Please provide a definition of "a short distance" in terms of number of feet. If the term cannot be defined in this manner, please explain why not.

### **HEN 1-11**

Please confirm the WDS DG tariff is the only rate available for energy storage resources that take wholesale transmission service at distribution voltage from AEP Texas.

### **HEN 1-12**

Did AEP Texas consider multiple rates depending upon the location of the DESR WDS DG customer in relation to AEP Texas's substation? If yes, please explain why more than one rate was not pursued. If no, please explain why more than one rate was not considered.

### **HEN 1-13**

Please provide a list of the costs caused by WDS DG customers located a short distance from an AEP Texas substation.

### **HEN 1-14**

Please provide a list of the costs caused by WDS DG customers located more than a short distance from an AEP Texas substation.

### **HEN 1-15**

Please confirm costs associated with primary distribution plant are allocated on Non-coincidental peak (NCP).

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### **HEN 1-16**

Please provide the time and date that each class NCP occurred in the class cost of service study from AEP Texas's last rate case (test year ending December 31, 2018).

### **HEN 1-17**

Please provide the time and date that each class NCP occurred in years 2019 through 2022.

### **HEN 1-18**

Has AEP Texas made any adjustments to the Retail Primary Voltage Service rate since AEP Texas's last rate case (test year ending December 31, 2018)?

### **HEN 1-19**

What, if any, differences are there in the charges under the Retail Primary Voltage Service tariff and the WDS DG tariff?

### **HEN 1-20**

How does charging an energy storage resource connected at distribution voltage a Customer Charge, Metering Charge, Distribution System Charge and Distribution Cost Recovery Factor – DCRF charge, each of which was developed as a retail rate for delivery service to primary voltage retail customers, comport with 16 Texas Administrative Code § 25.501(m)?

### **HEN 1-21**

From the most recent AEP Texas rate case (test year ending December 31, 2018), for each wholesale and retail class for which certain distribution costs are allocated on NCP, provide the Hourly Class Loads (kW) shown by 15 minute intervals for the test year.

### **HEN 1-22**

Please list all FERC accounts that have costs included in the proposed rates for the Customer Charge, Metering Charge, Distribution System Charge or Distribution Cost Recovery Factor – DCRF charge included in the WDS DG tariff. Please provide a separate list for each different charge.

### **HEN 1-23**

With regard to energy storage resources interconnected at distribution voltage (DESRs) in AEP Texas's service territory:

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- a) How many DESRs are in operation in AEP Texas's service territory?
- b) What are the commercial operation date(s) associated with the DESRs provided in response to subpart (a)?
- c) In addition to the DESRs provided in response to subpart (a), how many DESRs have signed Interconnection Agreements with AEP Texas.

### **HEN 1-24**

Please provide any data AEP Texas has collected regarding the charging and discharging of DESRs.

### **HEN 1-25**

How does AEP Texas determine the "15 minute period of maximum use" in the WDS DG tariff?

- a) Is the 15 minute period of maximum use limited to when a WDS DG customer is charging (as opposed to discharging)?
- b) Is the 15 minute period of maximum use limited to after commercial operation of the resource? Or could it be achieved during the testing phase?

### **HEN 1-26**

Please provide a copy of the Distributed Generation Service Agreement referenced in the WDS DG tariff.

### **HEN 1-27**

Please explain in detail how AEP Texas calculates the contribution in aid of construction (CIAC) estimate referenced in the WDS DG tariff, including but not limited to components, cost adders, standard allowances, franchise fees, prorated portion of facilities that jointly serve other customers, and tax liability.

### **HEN 1-28**

Does AEP Texas provide a detailed invoice with each of the items listed in response to RFI HEN 1-27? If not, why not and would AEP Texas be willing to provide?

### **HEN 1-29**

Does AEP Texas true-up its CIAC estimates upon completion of the facilities, upgrades, extensions, and modifications necessary to provide the requested service?

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### **HEN 1-30**

Does AEP Texas use third-party contractors to design, procure, and/or construct distribution facilities needed to interconnect DESRs that will be owned and operated by AEP Texas?

### **HEN 1-31**

From the most recent AEP Texas rate case (test year ending December 31, 2018) and for calendar years 2019, 2020, and 2021, for each AEP Texas substation in ERCOT serving distribution customers, provide the Hourly Loads (kW) of the substation shown by 15 minute intervals. If AEP Texas does not have the Hourly Loads by 15 minute intervals by substation, provide all substation load data by intervals that AEP Texas does have.

### **HEN 1-32**

Please identify which substations included in your response to RFI No. HEN 1-31 have DESRs interconnected.

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