



Filing Receipt

Received - 2022-08-29 02:53:39 PM
Control Number - 53625
ItemNumber - 89

**SOAH DOCKET NO. 473-22-00991
DOCKET NO. 53625**

APPLICATION OF SOUTHWESTERN ELECTRIC POWER COMPANY FOR CERTIFICATE OF CONVENIENCE AND NECESSITY AUTHORIZATION AND RELATED RELIEF FOR THE ACQUISITION OF GENERATION FACILITIES	§ § § § § § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
--	--	--

**EAST TEXAS ELECTRIC COOPERATIVE, INC.
AND
NORTHEAST TEXAS ELECTRIC COOPERATIVE, INC.
FIRST SET OF REQUEST FOR INFORMATION TO
SOUTHWESTERN ELECTRIC POWER COMPANY**

East Texas Electric Cooperative, Inc. ("ETEC") AND Northeast Texas electric Cooperative, Inc. ("NTEC") requests that Southwestern Electric Power Company ("SWEPCO") provide all the information requested and to answer under oath the questions propounded herein. The questions should be answered in the order in which they are asked and in sufficient detail to fully present all of the relevant facts.

Instructions

Please copy the question immediately above the answer to each and indicate at the bottom of each answer the name and job title of the person, other than counsel, chiefly responsible for preparation of the answer. Also state the name of the witness in this proceeding who will sponsor the answer to the question and who can vouch for the truth and veracity of the response given.

If any question appears confusing, please request clarification from the attorneys of record.

If SWEPCO asserts that any documents responsive to any request have been discarded or destroyed and are thus not available, state when, and explain why any such document was destroyed or discarded and identify the person directing the destruction or discarding; provide all documents relating to any criteria or procedure of the company under which such document was discarded or destroyed.

If SWEPCO asserts documents are under claim of privilege, please furnish a list identifying each document for which privilege is claimed, together with the following information: date, sender, recipient, recipient of copies, subject matter of document, and the basis upon which such

privilege is claimed. Please also further support the privilege that you claim, with reference to applicable decisions and Attorney General Opinions.

If SWEPCO asserts documents are protected from disclosure under the protective order, please specifically state the provision of the Government Code that applies to the particular documents sought, and explain why the exception applies. A contention that information is excepted from disclosure in accordance with Section 552.101 should specifically identify the law, statute, or judicial decision that makes the information confidential. A contention that a document is protected under Section 552.104 or Section 552.110(b) requires a showing of some actual or specific harm in a particular competitive situation; a generalized allegation that a competitor will gain an unfair advantage will not suffice. ORD 541 at 4 (1990); ORD 661 at 5-6 (1999). A contention that a document is confidential under 552.110(a) should show that the information meets the definitions of a trade secret. ORD 552 at 2 (1990); ORD 402 (1983); Section 757, Restatement of Torts as adopted by the Texas Supreme Court in *Hyde Corp. v. Huffines*, 314 S.W.2d 763, 776 (Tex.), *cert. denied*, 358 U.S. 898 (1958). See also OR2002-3953 (2002).

These questions and requests are continuing in nature and should there be a change in circumstances, which would modify or change an answer supplied, then in such event you are requested to change or modify such answer under oath and to submit such changed answer as a supplement to your original answer.

DEFINITIONS

For the purpose of this request for information, the expressions set forth below shall have the following meanings:

(1) “SWEPCO” or “the Company” refers to Southwestern Electric Power Company and its affiliates, subsidiaries, and any person acting or purporting to act on their behalf, including without limitation, attorneys, agents, advisors, investigators, representatives, employees or other persons.

(2) “You,” “your,” “yours,” and “Company” refer collectively to the Company (as defined above), including its officers, directors, agents, attorneys, consultants, employees, representatives, any other person or entity acting or purporting to act on their behalf.

(3) “Application” refers to the Application and supporting testimony, schedules and other documents submitted by the Company in this docket.

(4) “Document” and “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, including, but not limited to memoranda, notes, analyses, minutes, records, photographs, correspondence, telegrams, electronic mail (email), cards, computer storage device or any other media, recordings, contracts, agreements, invoices, licenses, diaries, journals, accounts, pamphlets, books, ledgers, publications, microfilm, microfiche, drafts, 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, 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.

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

(6) “Each” shall be construed to include the word “every” and “every” shall be construed to include the word “each.”

(7) “Any” shall be construed to include “all” and “all” shall be construed to include “any.”

(8) The term “concerning” or one of its reflections, 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.

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

(10) “Relate to,” “regarding,” “concerning” and similar terms mean addressing, analyzing, referring, discussing, mentioning in any way, explaining, supporting, describing, forming the basis for, or being logically or causally connected in any way with the subject of these discovery requests.

(11) “Provide the basis,” “state the basis,” or “explain the basis” means provide all information on or describe every fact, statistic, inference, estimate, consideration, conclusion, study, and analysis known to the Company that was relied upon in support of the expressed contention, proposition, conclusion or statement.

(12) Words used in the plural shall also be taken to mean and include the singular. Words used in the singular shall be also taken to mean and include the plural.

(13) The present tense shall be construed to include the past tense, and the past tense shall be construed to include the present tense.

(14) If any document is withheld under any claim of privilege, please furnish a list identifying each documents for which a privilege is claimed, together with the following information: date, sender, recipients of copies, subject matter of the document, and the basis upon which such privilege is claimed.

(15) If the response to any request is voluminous, please provide a detailed index of the voluminous material, pursuant to 16 TAC § 22.144(h)(4).

(16) If the information requested is included in previously furnished exhibits, workpapers, and responses to other discovery inquiries or otherwise, in hard copy or electronic format, please furnish specific references thereto, including Bate Stamp page citations and detailed cross-references.

(17) “Commission” and “PUC” means the Public Utility Commission of Texas; and

(18) “Staff” means the professional staff of the Public Utility Commission of Texas.

The requests for information are set forth on the attached list.

Respectfully submitted,

/s/ Jacob Lawler

Mark C. Davis
State Bar No. 05525050
Mark.Davis@hklaw.com
Adrianne M. Waddell
State Bar No. 24098556
Adrianne.Waddell@hklaw.com
Jacob J. Lawler
State Bar No. 24076502
Jacob.Lawler@hklaw.com
HOLLAND & KNIGHT, LLP
98 San Jacinto Blvd., Suite 1900
Austin, Texas 78701
(512) 472-1081
(512) 472-7473 FAX

**ATTORNEYS FOR
EAST TEXAS ELECTRIC
COOPERATIVE, INC.**

CERTIFICATE OF SERVICE

I certify that, unless otherwise ordered by the presiding officer, notice of the filing of this document was provided to all parties of record via electronic mail on August 29, 2022, in accordance with the Second Order Suspending Rules, issued in Docket No. 50664.

/s/ Jacob Lawler

Jacob Lawler

**SOAH DOCKET NO. 473-22-00991
DOCKET NO. 53625**

APPLICATION OF SOUTHWESTERN ELECTRIC POWER COMPANY FOR CERTIFICATE OF CONVENIENCE AND NECESSITY AUTHORIZATION AND RELATED RELIEF FOR THE ACQUISITION OF GENERATION FACILITIES	§ § § § § § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
--	--	--

**EAST TEXAS ELECTRIC COOPERATIVE, INC.
AND
NORTHEAST TEXAS ELECTRIC COOPERATIVE, INC.
FIRST SET OF REQUEST FOR INFORMATION TO
SOUTHWESTERN ELECTRIC POWER COMPANY**

WITNESS ALI

**I. NETWORK UPGRADES IDENTIFIED BY SPP FOR GENERATOR
INTERCONNECTION**

- | | |
|---------------|--|
| ETEC/NTEC 1-1 | Please confirm or deny: The costs of Network Upgrade Facilities are assigned to the generator. |
| ETEC/NTEC 1-2 | Please provide the SPP DPP studies that identified the Generation Interconnection Upgrades and Network Interconnection Upgrades for each RFP Bid. |
| ETEC/NTEC 1-3 | Please provide any documents, correspondence, work papers, etc. between Witness Ali and Witness Martin or Witness Jeffries related to the Generation Interconnection Upgrades or Network Interconnection Upgrades for any RFP Bid. |

II. DELIVERABILITY ANALYSIS FOR FIRM TRANSMISSION

- ETEC/NTEC 1-4 Please describe any changes the Company made to the SPP ATSS power flow models for the firm transmission/deliverability analysis. Please provide in machine-executable PSS/E .RAW format the applicable SPP ATSS models, including any input files such as .CON, .MON and .SUB files. Please provide the parameters used by the Company to solve the power flow cases, including, but not limited to, solution technique, number of iterations permitted, tolerance, and status of load tap changers. Please provide any change files, .IDV files or any Python programs used to solve or modify the cases.
- ETEC/NTEC 1-5 Please provide the planning cost assumptions used to determine transmission facilities costs that were passed to Witness Martin.
- ETEC/NTEC 1-6 Please confirm or deny: The planning cost estimates used for the RFP Analysis are the same assumptions used by the Company for estimating costs in the SPP DPP process.
- ETEC/NTEC 1-7 Please provide any documents, correspondence, work papers, etc. between Witness Ali and Witness Martin related to the deliverability/firm transmission analysis for any RFP Bid.
- ETEC/NTEC 1-8 Please provide any documents, correspondence, work papers, etc. between Witness Ali and Witness Jeffries related to the deliverability/firm transmission analysis for any RFP Bid.

III. PRODUCTION COST ANALYSIS FOR CONGESTION AND LOSS RISK ASSESSMENTS

- ETEC/NTEC 1-9 Please provide both the SPP PROMOD models that were the basis of the Company PROMOD models and the Company-modified PROMOD

models for 2026 and 2031 used to perform the congestion and loss risk analysis.

- ETEC/NTEC 1-10 Please provide any correspondence and work papers shared between Witness Ali and Witness Martin related to the PROMOD analysis, including any discussion of assumptions.
- ETEC/NTEC 1-11 Please confirm or deny: The power flow representation used by the Company for the Deliverability Analysis is the exact same representation used in the PROMOD cases for the congestion and loss analysis. If deny, please provide a list of the differences between the two sets of power flow representations and explain why those differences do not have a material impact on the congestion and loss risk analysis.
- ETEC/NTEC 1-12 Please explain how the generation dispatch was adjusted in the ATSS cases to accommodate the Company's unit retirements provided by Witness Smoak. Please provide the modeled PGEN by unit for all facilities in AEP West with and without the Company's unit retirements.
- ETEC/NTEC 1-13 Please provide the PowerGEM TARA output results for each RFP bid facility.
- ETEC/NTEC 1-14 Please provide a list of the "transmission topology changes that were not known when assumptions were being finalized by SPP for its 2021 ITP Assessment." (Ali at 10:15-17)
- ETEC/NTEC 1-15 Please provide a list of the "new transmission constraints caused by adding the new solar and wind RFP bids to the datasets." (Ali at 10:21-23)

- ETEC/NTEC 1-16 Please provide “the hourly marginal congestion cost and marginal loss charge components of the LMP 4 for each RFP bid injection pricing node and the AEP West Zone for 2026 and 2031.” (Ali at 11:3-4).
- ETEC/NTEC 1-17 Please confirm or deny: The value stream of Auction Revenue Rights (ARR) can change with changes in transmission system topology.
- ETEC/NTEC 1-18 Please provide any documents, correspondence, work papers, etc. between Witness Ali and Witness Martin related to the congestion and loss analysis for any RFP Bid.
- ETEC/NTEC 1-19 Please provide any documents, correspondence, work papers, etc. between Witness Ali and Witness Jeffries related to the congestion and loss analysis for any RFP Bid.