



Filing Receipt

Filing Date - 2023-06-16 08:24:05 AM

Control Number - 55094

Item Number - 11

**SOAH DOCKET NO. 473-23-20742
PUC DOCKET NO. 55094**

APPLICATION OF AEP TEXAS INC.	§	PUBLIC UTILITY COMMISSION
TO ADJUST ITS ENERGY	§	
EFFICIENCY COST RECOVERY	§	OF TEXAS
FACTOR AND RELATED RELIEF	§	

**COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION TO
AEP TEXAS INC.
QUESTION NOS. STAFF 1-1 THROUGH 1-2**

Pursuant to 16 Texas Administrative Code (TAC) § 22.144 of the Commission's Procedural Rules, the Staff (Staff) of the Public Utility Commission of Texas (Commission) requests that AEP Texas Inc. by and through its representative of record, provide the following information and answer the following questions under oath. The questions shall be answered in sufficient detail to fully present all of the relevant facts, within the time limit provided by the Presiding Officer or within 20 days if the Presiding Officer has not provided a time limit. Please copy the question immediately above the answer to each question. These questions are continuing in nature, and if there is a relevant change in circumstances, submit an amended answer, under oath, as a supplement to your original answer. State the name of the witness in this cause who will sponsor the answer to the question and can vouch for the truth of the answer.

Provide responses to the Requests for Information by filing with the Commission solely through the Interchange on the Commission's website and provide notice, by email, to all other parties that the pleading or document has been filed with the Commission, unless otherwise ordered by the presiding officer pursuant to the Second Order Suspending Rules in Project No. 50664.

Dated: June 16, 2023

Respectfully submitted,

**PUBLIC UTILITY COMMISSION OF TEXAS
LEGAL DIVISION**

Marisa Wagley
Division Director

Sneha Patel
Managing Attorney



Rachel Seshan
State Bar No. 24033178
Forrest Smith
State Bar No. 24093643
1701 N. Congress Avenue
P.O. Box 13326
Austin, Texas 78711-3326
(512) 936-7288
(512) 936-7268 (facsimile)
Rachel.Seshan@puc.texas.gov

**SOAH DOCKET NO. 473-23-20742
PUC DOCKET NO. 55094**

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 June 16, 2023, in accordance with the Second Order Suspending Rules, filed in Project No. 50664.

/s/ Rachel Seshan
Rachel Seshan

**SOAH DOCKET NO. 473-23-20742
PUC DOCKET NO. 55094**

**COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION TO
AEP TEXAS INC.
QUESTION NOS. STAFF 1-1 THROUGH 1-2**

DEFINITIONS

- 1) "AEP" or "you" refers to that AEP Texas Inc. and any person acting or purporting to act on their behalf, including without limitation, attorneys, agents, advisors, investigators, representatives, employees, or other persons.
- 2) "Document" includes any written, recorded, or graphic matter, however produced or reproduced, including but not limited to correspondence, telegrams, contracts, agreements, notes in any form, memoranda, diaries, voice recording tapes, microfilms, pictures, computer media, work papers, calendars, minutes of meetings or other writings or graphic matter, including copies containing marginal notes or variations of any of the foregoing, now or previously in your possession. In the event any documents requested by this Request for Information have been transferred beyond your control, describe the circumstances under which the document was destroyed or transferred and provide an exact citation to the subject document. In the event that documents containing the exact information do not exist, but documents do exist which contain portions of the required information, or which contain substantially similar information, then the definition of "documents" shall include the documents which do exist, and these documents will be provided.

DOCKET NO. 55094

**COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION TO
AEP TEXAS INC.**

QUESTION NOS. STAFF 1-1 THROUGH 1-2

INSTRUCTIONS

- 1) Pursuant to 16 TAC § 22.144(c)(2), Staff requests that answers to the requests for information be made under oath.
- 2) Please copy the question immediately above the answer to each question. State the name of the witness in this cause who will sponsor the answer to the question and can vouch for the truth of the answer.
- 3) These questions are continuing in nature, and if there is a relevant change in circumstances, submit an amended answer, under oath, as a supplement to your original answer.
- 4) 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.
- 5) The present tense shall be construed to include the past tense, and the past tense shall be construed to include the present tense.
- 6) 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.
- 7) Pursuant to 16 TAC § 22.144(h)(4), if the response to any request is voluminous, please provide a detailed index of the voluminous material.
- 8) Staff requests that each item of information be made available as it is completed, rather than upon completion of all information requested.

DOCKET NO. 55094

**COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION TO
AEP TEXAS INC.**

QUESTION NOS. STAFF 1-1 THROUGH 1-2

- Staff 1-1** Please provide a detailed breakdown of the administrative, and the research and development costs as outlined in Schedule S, Table 11, at page 23, for the 2022 program year. Provide copies of any applicable invoices and contracts or supporting documents for the 2022 program year.
- Staff 1-2** Please provide a detailed breakdown of the research and development costs proposed for the 2023 and 2024 program years as outlined in Schedule S, Table 6 and Table 7, at pages 16 - 17. Provide copies of any applicable contracts or supporting documents for the 2023 and 2024 program years.