



Filing Receipt

Filing Date - 2024-04-17 01:45:28 PM

Control Number - 56165

Item Number - 119

**SOAH DOCKET NO. 473-24-12812
PUC DOCKET NO. 56165**

APPLICATION OF AEP TEXAS INC. FOR AUTHORITY TO CHANGE RATES	§ § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
--	----------------------	---

**CITIES SERVED BY AEP TEXAS' FIFTEENTH REQUEST
FOR INFORMATION TO AEP TEXAS INC.**

The Cities Served by AEP Texas (Cities) files its Fifteenth Request for Information (RFI) to AEP Texas Inc. (AEP Texas or the 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 fifteen (15) calendar days. 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 hearing. Also, where data is requested, provide it in hard copy and Excel format with all formulas intact.

DEFINITIONS AND INSTRUCTIONS

A. "AEP Texas" refers to the AEP Texas Inc.

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 document is a separate document within the meaning of this term.

C. Pursuant to Tex. R. Civ. P. 196.4, Cities specifically requests 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 requests that AEP Texas 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.

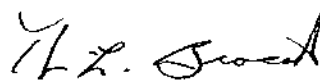
L. Pursuant to 16 Tex. Admin Code § 22.144(h)(4), if the response to any request is voluminous, please provide a detailed index of the voluminous material.

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
Austin, Texas 78701
(512) 322-5800 Tel.
(512) 472-0532 Fax



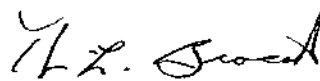
THOMAS L. BROCATO
State Bar No. 03039030
tbrocato@lglawfirm.com

SAMANTHA M. MILLER
State Bar No. 24131515
smiller@lglawfirm.com

**ATTORNEYS FOR CITIES SERVED BY AEP
TEXAS**

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 April 17, 2024, in accordance with the Order Suspending Rules, issued in Project No. 50664.



THOMAS L. BROCATO

CITIES' FIFTEENTH RFI TO AEP TEXAS

CITIES 15-1 Refer to Schedules II-H-1.1, II-H-1.2, II-H-1.3, II-H-3.1-3, II-H-4.1 Functions, and all other Schedules and Workpapers wherein the Company calculated the effects on base revenues of annualizing customer growth through the end of the test year.

- a. Provide a version of these Schedules and Workpapers to calculate the effects on base revenues of annualizing customer growth through the end of the calendar year 2023 or explain why the Company cannot do so.
- b. Provide a version of these Schedules and Workpapers to calculate the effects on base revenues of annualizing customer growth through the end of the first quarter 2024 or explain why the Company cannot do so.
- c. Confirm that only the Company has the data to provide a version of these Schedules and Workpapers with actual data for the six months after the end of the test year.
- d. Confirm that customer growth and the effects of that growth on base revenues as requested in parts (a) and (b) of this question are known and measurable because they are based on actual customer metrics in the same manner as the Company's proposed adjustment to increase base revenues at the end of the test year is based on actual customer metrics. If this is not correct, then provide a corrected statement; identify and describe all differentiating factors as to why the Company's proposed adjustment is known and measurable, but adjustments to the two subsequent dates are not known and measurable; and provide all support relied on for your response.

CITIES 15-2 Refer to Schedules II-H-3.1-3.

- a. Indicate if the actual booked customer counts shown for the months of October 2022 through September 2023 are at the beginning or the end of each month.
- b. Provide the actual booked customer counts for the month of September 2022 in the same level of detail as shown on this schedule and an Excel workbook.
- c. If not already provided in response to Cities 15-1(a), then provide the actual booked customer counts in the same level of detail as shown on this schedule and in the same format for each month beginning September 2023 and through March 2024 if counts are at the end of the month or through April 2024 if the counts are at the beginning of the month.

SOAH DOCKET NO. 473-24-12812
PUC DOCKET NO. 56165
CITIES' FIFTEENTH RFI TO AEP TEXAS

CITIES 15-3 Confirm that the Company annualized payroll expenses based on the last payrolls in September 2023 and then further annualized payroll expenses for estimated salaried payroll increases on or about January 1, 2024, and bargaining unit increases on or about April 1, 2024. If this is not correct, then provide a corrected statement and provide all support relied on for your response.