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

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

**HUNT ENERGY NETWORK LLC'S
FIRST SET OF REQUESTS FOR INFORMATION TO
AEP TEXAS INC.**

Hunt Energy Network L.L.C. ("HEN") requests that AEP Texas Inc. ("AEP") fully respond to the attached set of requests for information ("RFIs") within 15 calendar days pursuant to SOAH Order No. 2.

Responses to these RFIs shall conform in all respects to the Public Utility Commission of Texas'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,

By /s/ Marty Hopkins

Marty Hopkins
State Bar No. 24059970
Wilkinson Barker Knauer LLP
812 San Antonio, Suite 310
Austin, Texas 78701
(737) 770-3413
mhopkins@wbklaw.com

**ATTORNEY FOR HUNT ENERGY NETWORK,
L.L.C**

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing document has been forwarded to all parties of record in this proceeding via electronic mail on this 17th day of April, 2024, in accordance with the Order Suspending Rules, issued in Project No. 50664.

By: /s/ Melvena Rhett-Fair

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 otherwise incomplete, please provide available information or data.
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 to bring within the scope of each RFI 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, 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.

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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 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 1-1.

Please refer to Jennifer L. Jackson's direct testimony at page 37. Please confirm that as of the Test Year end, AEP had 20 customers operating battery energy storage systems ("BESS") in its service territory for which the WDS for BESS Tariff ("WDS Tariff") would be applicable and please provide a list of such customers on a no-name basis with the following information for each:

- a. The nameplate capacity of the BESS;
- b. Coincident and non-coincident peak demand for each customer for the Test Year;
- c. The approximate distance of each BESS facility from the AEP substation to which it is interconnected;
- d. The amount of Contribution in Aid of Construction ("CIAC") paid by each customer;
- e. Whether the BESS is a stand alone facility or co-located with other retail load or other generation resources;
- f. The length of time from the payment of the CIAC by the customer to the date AEP's interconnection facilities are operational;
- g. Whether the completed construction and energization by AEP of its interconnection facilities to the BESS was later than the date agreed to by AEP in the interconnection agreement and the number of days by which the completed utility interconnection was delayed; and
- h. The date of commercial operation for each BESS during the Test Year.

HEN 1-2.

With regard to the WDS Tariff,

- a. Please provide the definition of a Battery Energy Storage System (BESS) as referred to in the WDS Tariff and explain why a definition is not provided in the tariff.
- b. Please explain why AEP chose to limit the WDS Tariff to battery storage customers and not include other forms of energy storage resources?
- c. Does the WDS Tariff apply only to battery energy storage systems that are registered with ERCOT as a Resource?
- d. Does the WDS Tariff apply to battery energy storage systems that are co-located with customer load?

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HEN 1-3.

Did AEP consider other rate design approaches to recover costs from BESS receiving wholesale transmission service at distribution voltage, such as direct assignment of costs? If yes, please provide all documents relating to such alternative rate designs. If not, why not?

HEN 1-4.

For those BESS that are located adjacent to the AEP substation into which they are interconnected, did AEP consider whether to offer a WDS for BESS substation rate? If not, why not? Please provide all documents created if such a tariff was considered.

HEN 1-5.

Has AEP analyzed the capital costs AEP incurs associated with interconnecting and service to energy storage facilities at the distribution system level? If so, please provide the results of such analyses, and associated work papers, to the extent such analyses were concluded. To the extent analyses are in draft form, please provide the most current draft.

HEN 1-6.

Has AEP analyzed the O&M costs AEP incurs associated with serving energy storage facilities at the distribution system level? If so, please provide the results of such analyses, and associated work papers, to the extent such analyses were concluded. To the extent analyses are in draft form, please provide the most current draft.

HEN 1-7.

Please refer to Jennifer L. Jackson's direct testimony at page 37. Please provide a list of the pending interconnection requests for BESS facilities on a no-name basis that AEP has received to date for which the WDS Tariff would be applicable with the following information for each:

- a. The nameplate capacity of the BESS;
- b. The approximate distance of each BESS facility from the AEP substation to which it will be interconnected;
- c. The amount of CIAC paid or required to be paid by each customer;
- d. Whether the BESS is a stand alone facility or co-located with other retail

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- load or other generation resources; and
- e. The expected date of commercial operation for each BESS during the Test Year.

HEN 1-8.

Please provide a dated copy of the notice AEP sent to Hunt Energy Network LLC or its affiliates HEN Power Marketing LLC and HEN Infrastructure, LLC notifying HEN, as an AEP BESS customer, of this rate case.

HEN 1-9.

Please provide copies of the CIAC invoices for each operating BESS facility and the supporting documentation, if any, that AEP provided to each BESS customer for the calculation of the CIAC.

HEN 1-10.

Did AEP consider multiple rates depending upon the location of the WDS Tariff customer in relation to AEP'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 1-11.

Please provide a list of the costs caused by WDS Tariff customers located less than 1,000 feet from an AEP substation.

HEN 1-12.

Please provide a list of the costs caused by WDS Tariff customers located more than 1,000 feet from an AEP substation.

HEN 1-13.

Please confirm costs associated with primary distribution plant are allocated on Non-

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coincidental peak ("NCP").

HEN 1-14.

Please provide the time and date that each class NCP occurred in the class cost of service study.

HEN 1-15.

Please provide the time and date that each class NCP occurred in years 2019 through 2023.

HEN 1-16.

Please refer to Chad Burnett's direct testimony on page 12. Has AEP performed an analysis of the AEP system load relative to the battery charging and discharging for any day other than July 31, 2023? If so, please provide all such analyses, charts and documents relating to such analysis.

HEN 1-17.

Please explain how AEP determines whether the BESS shall be subject to charging and discharging limits as described in the WDS Tariff. At what point in the interconnection process is the customer informed that it will be limited in its ability to charge and discharge the battery?

HEN 1-18.

Does AEP provide wholesale transmission delivery service to any customers other than BESS facilities? If so, is such service provided at transmission or distribution voltage?

HEN 1-19.

Referring to Chad Burnett's direct testimony on page 12, please explain how recovery of distribution system costs from batteries on an NCP basis addresses the concern raised by

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Mr. Burnett relating to a BESS's contribution to 4CP and allocation of TCOS. Given Mr. Burnett's concern, did AEP consider designing the WDS Tariff using the BESS' contribution to AEP's system peak or the 4CP?

HEN 1-20.

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 1-21.

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

HEN 1-22.

Please explain the rationale for applying the 80% demand ratchet in the WDS Tariff to BESS that are ERCOT Resources and are SCED-dispatched and thus directed by ERCOT when charge or discharge from the battery.

HEN 1-23.

Please provide all data AEP has collected regarding the charging and discharging of BESS operating within its service area.

HEN 1-24.

How does AEP determine the "15-minute period of maximum use" in the WDS Tariff?

- a. Is the 15-minute period of maximum use limited to when a WDS 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 ERCOT-required testing phase?

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HEN 1-25.

Please provide a copy of the Distribution Generation Interconnection Agreement (DGIA) referenced in the WDS Tariff.

HEN 1-26.

Please explain in detail how AEP calculates the CIAC required of the BESS customers, 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 1-27.

With respect to the CIAC:

- a. Does AEP provide an interconnection allowance to BESS facilities? If not, why not?
- b. Does AEP provide an interconnection allowance to retail load that is requesting to interconnect to AEP's system?
- c. Does AEP provide an interconnection allowance and/or charge a CIAC to other forms of generation or energy storage resources interconnected at distribution voltage? Please describe the process AEP uses to calculate such CIAC.
- d. Does AEP provide an interconnection allowance and/or charge a CIAC to other forms of generation or energy storage resources interconnected at transmission voltage?

HEN 1-28.

Does AEP provide a detailed invoice with each of the cost items listed in response to RFI No. HEN 1-26? If not, why not? Would AEP be willing to provide such a detailed invoice if requested by the customer?

HEN 1-29.

Does AEP true-up its CIAC estimates upon completion of the facilities, upgrades,

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extensions, and modifications necessary to provide the requested service? If not, why not?

HEN 1-30.

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

HEN 1-31.

For calendar years 2019 through 2023, for each AEP substation in ERCOT serving distribution customers, provide the Hourly Loads (kW) of the substation shown by 15-minute intervals. If AEP does not have the Hourly Loads by 15-minute intervals by substation, provide all substation load data by intervals that AEP does have.

HEN 1-32.

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

HEN 1-33.

Please confirm the WDS Tariff proposed in this proceeding is the same tariff proposed in Docket No. 53267 and describe any changes from the tariff proposed in Docket No. 53267 and this proceeding.

HEN 1-34.

Please confirm AEP is seeking final implementation and approval of the WDS Tariff in this proceeding.

HEN 1-35.

If AEP relied on any documents from its affiliates in determining whether to offer the WDS Tariff (and/or the design of such a tariff), or received any directives to offer a WDS tariff,

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please provide the operative documents.

HEN 1-36.

If AEP relied on any documents from third parties in determining whether to offer the WDS Tariff (and/or the design of such a tariff), please provide the operative documents.

HEN 1-37.

Do any affiliates of AEP have tariffs applicable to BESS connected at the distribution level, whether limited specifically to BESS or not? To the extent the answer is yes, please provide each such tariff.

HEN 1-38.

Do any affiliates of AEP own and/or operate BESS connected at the distribution level? If so, please provide a list of such facilities, and, for each, describe the treatment of the costs associated with installing and operating the facilities.