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PUC DOCKET NO. 56165

**APPLICATION OF AEP TEXAS
INC. FOR AUTHORITY TO
CHANGE RATES**

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**BEFORE THE

PUBLIC UTILITY COMMISSION

OF TEXAS**

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

The Cities Served by AEP Texas (Cities) files its Fourth 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 twenty (20) 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,

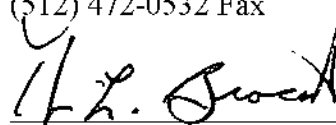
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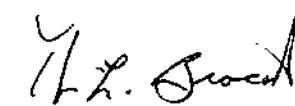
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**ATTORNEYS FOR CITIES SERVED BY AEP
TEXAS**

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 March 14, 2024, in accordance with the Order Suspending Rules, issued in Project No. 50664.



THOMAS L. BROCATO

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CITIES' FOURTH RFI TO AEP TEXAS

- CITIES 4-1** Please provide: (1) a graphic representation showing the divisions of American Electric Power, Inc.; (2) the 2022 and 2023 operating revenues and operating profits of each division; and (3) the amount of capital, as well as the capital structure (amount of short-term debt, long-term debt, and common equity), invested in each division as of December 31, 2022 and 2023; and (4) please provide the data and work papers in both PDF and electronic (Microsoft Excel) formats, with all data and formulas intact.
- CITIES 4-2** For American Electric Power, Inc. for the fiscal years 2021, 2022, and 2023, please provide: (1) total enterprise revenues; (2) the amount and percent of total enterprise revenues that come from regulated electric operations; and (3) the amount and percent of total enterprise revenues that come from other regulated operations; (4) the amount and percent of total enterprise revenues that come from other business operations; (5) for (2), (3), and (4), please identify where in Public Service Enterprise Group's SEC 10-k the regulated and other revenues are provided for each utility owned by Essential Utilities, Inc; and (6) please provide the data and work papers in both PDF and electronic (Microsoft Excel) formats, with all data and formulas intact.
- CITIES 4-3** Please provide copies of all presentations made to rating agencies, financial institutions, banks, and/or investment firms by AEP Texas and American Electric Power, Inc. between January 1, 2021 and the present.
- CITIES 4-4** Please provide copies of credit reports for the AEP Texas and American Electric Power, Inc. from the major credit rating agencies (S&P, Moody's, and Fitch) published since January 1, 2021. Please provide any newly published credit reports before the Commission issues its order in this case.
- CITIES 4-5** Please provide copies of all prospectuses for any security issuances by American Electric Power, Inc. or AEP Texas between January 1, 2020 and the present.
- CITIES 4-6** For the years 2019-present, please provide the dollar amount and dates of (1) all equity infusions into AEP Texas by American Electric Power, Inc.; and (2) all dividend payments paid by AEP Texas to American Electric Power, Inc.
- CITIES 4-7** For the years 2019-present, please provide the dollar amount and dates of all flotation costs paid by AEP Texas.
- CITIES 4-8** Please provide: (1) the end-of-quarter rate base amounts for AEP Texas for the years (2020-2023); (2) the end of quarter amounts for AEP Texas of short-term debt, long-term debt, and common equity, for the years (2020-2023); and (3) the data and work papers in both PDF and electronic (Microsoft Excel) formats, with all data and formulas intact.

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- CITIES 4-9** Please provide the breakdown in the expected return on the pension plan assets of AEP Texas. Specifically, please provide the expected return on different assets classes (bonds, US stocks, international stocks, etc.) used in determining the expected return on plan assets. Please provide all associated source documents and work papers.
- CITIES 4-10** Please provide the Company's authorized and earned return on common equity for AEP Texas over the past five years (2019-23).
- CITIES 4-11** For the past five years (2019-2023), please list the credit ratings for AEP Texas and American Electric Power, Inc. by the three major credit rating agencies. For each time a credit rating was changed either up or down by any of the three rating agencies, please provide a copy of the related credit rating report.
- CITIES 4-12** Please provide: (1) copies of the source documents, data and work papers associated with the development of the Company's proposed capital structure; (2) the Company's actual capital structure, including short-term debt, and short-term and long-term debt cost rates as of 12/31/23; and (3) the data and work papers in both paper and electronic (Microsoft Excel Worksheet) forms. For the Microsoft Excel version, please include keep all formulas embedded in the worksheet.
- CITIES 4-13** Please provide: (1) the daily amounts of short-term debt and the daily cost rate of short-term debt for AEP Texas for the 2022-2024 time period; (2) the data in (1) in Microsoft Excel with all data formulas embedded in the worksheet.
- CITIES 4-14** Please provide the monthly amounts and cost rates of short-term and long-term debt and the amounts of shareholders equity for AEP Texas for the 2022-2024 time period; (2) the data in (1) in Microsoft Excel with all data formulas embedded in the worksheet.
- CITIES 4-15** With reference to the testimony of Ms. Ann E. Bulkley, please provide copies of all articles, publications, regulatory decisions, references, and/or documents cited in the testimony and/or footnotes. If the reference is a book, please provide a copy of the relevant section of the book.
- CITIES 4-16** With reference to the testimony of Ms. Ann E. Bulkley, please provide copies of Schedules AEB-2 - AEB-13 in Microsoft Excel, with all data and formulas intact.
- CITIES 4-17** With reference to the testimony of Ms. Ann E. Bulkley, please provide copies of source documents and work papers associated with the development of Schedules AEB-2 - AEB-13 in Microsoft Excel, with all data and formulas intact.