



## **Filing Receipt**

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<b>APPLICATION OF AEP TEXAS INC. FOR AUTHORITY TO CHANGE RATES</b>	§ § § §	<b>BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS</b>
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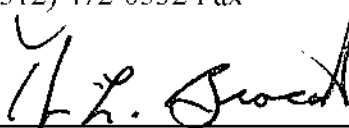
**CITIES SERVED BY AEP TEXAS' RESPONSE TO  
AEP TEXAS' FIRST REQUEST FOR INFORMATION**

The Cities Served by AEP Texas (Cities) files this Response to the First Request for Information (RFI) filed by the AEP Texas Inc. (AEP Texas or Company). The discovery request was received by Cities on May 20, 2024; therefore, these responses are timely filed. Pursuant to 16 Texas Administrative Code (TAC) § 22.144(c)(2)(F), these responses may be treated as if they were filed under oath.

Respectfully submitted,

**LLOYD GOSSELINK ROCHELLE  
& TOWNSEND, P.C.**

816 Congress Avenue, Suite 1900  
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(512) 322-5800 Tel.  
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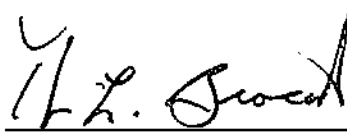
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**ATTORNEYS FOR CITIES SERVED BY  
AEP TEXAS**

**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 May 24, 2024, in accordance with the Order Suspending Rules, issued in Project No. 50664.

A handwritten signature in black ink, appearing to read "T. L. Brocato", is written over a horizontal line.

THOMAS L. BROCATO

**CITIES' RESPONSE TO AEP TEXAS' FIRST RFI**

**AEP TEXAS 1-1** Please provide, in native format, all workpapers and documents supporting testimony of each witness filing testimony on your behalf in this proceeding. Please ensure all formulas and cells are intact.

**RESPONSE OF CITIES' WITNESS CLARENCE JOHNSON:**

See WP AEP Texas 1-1 – CLJ CCOS Model provided with this Response, which is a Class Cost of Service (CCOS) model based on the Company's proposed revenue requirement increase that Mr. Johnson prepared to support his testimony. Refer also to the Direct Testimony of Clarence Johnson filed in this proceeding at Attachment CLJ-2.

Prepared by: Clarence Johnson

Sponsored by: Clarence Johnson

**RESPONSE OF CITIES' WITNESS KARL NALEPA:**

Refer to the Direct Testimony of Karl Nalepa filed in this proceeding at Attachment WP KJN-1 – WP-KJN-3 and CITIES 13-3 Attachment\_1.

Prepared by: Karl Nalepa

Sponsored by: Karl Nalepa

**RESPONSE OF CITIES' WITNESS LANE KOLLEN:**

Refer to the Direct Testimony of Lane Kollen filed in this proceeding at WP LK-1.

Prepared by: Lane Kollen

Sponsored by: Lane Kollen

**RESPONSE OF CITIES' WITNESS DAVID GARRETT:**

Refer to the Direct Testimony of David Garrett filed in this proceeding at WP DJG 1-10.

Prepared by: David Garrett

Sponsored by: David Garrett

**CITIES' RESPONSE TO AEP TEXAS' FIRST RFI**

**RESPONSE OF CITIES' WITNESS RANDY WOOLRIDGE:**

Dr. Woolridge's workpapers, data and work sheets, and source documents were provided in three ZIP files alongside his testimony and filed on May 17, 2024. The files, and their contents, are organized in the following manner:

File	Contents
2024 Articles.zip	Copies of articles, studies, reports, regulatory decisions, and orders used and cited in Dr. Woolridge's Direct Testimony and Exhibits, listed by author's name and date of publication.
Electric V-Lines – April 19, 2024.zip	Copies of the <i>Value Line</i> reports used in Dr. Woolridge's Direct Testimony and Exhibits.
TX – AEP - JRWoolridge – Work Sheets.zip	Copies of data, workpapers, and work sheets used in the development of Dr. Woolridge's Exhibits, as well as the Figures and Tables in his Direct Testimony.

Prepared by: Randy Woolridge  
Sponsored by: Randy Woolridge

**CITIES' RESPONSE TO AEP TEXAS' FIRST RFI**

**AEP TEXAS 1-2** For each testifying expert, please provide:

- a. A list of all cases in which the testifying expert has submitted testimony, from 2019 to the present;
- b. Copies of all prior testimony, articles, speeches, published materials, and peer review materials written by the testifying expert, from 2019 to the present;
- c. The testifying expert's billing rate for this proceeding; and
- d. All documents provided to, reviewed by, or prepared by or for the testifying expert in anticipation of the testifying expert filing testimony in this proceeding.

**RESPONSE OF CITIES' WITNESS CLARENCE JOHNSON:**

- a. Refer to Attachment CLJ-1 in the Direct Testimony of Clarence Johnson.
- b. Refer to Attachment CLJ-1, which lists Mr. Johnson's expert testimony by client, docket number, case, and issues addressed. The public versions of these testimonies are readily accessible on the applicable jurisdiction's website. Mr. Johnson has no articles, speeches, published materials, or peer review materials responsive to this request.
- c. Refer to the Direct Testimony of Clarence Johnson at 17 for this information.
- d. Mr. Johnson reviewed AEP Texas' rate filing package (RFP), including its schedules and workpapers, witness testimony, and discovery responses related to cost allocation and rate design. These responses were accessed through the Public Utility Commission of Texas' (Commission) electronic docketing system. Mr. Johnson included with his testimony all discovery responses to Cities' RFIs, as well as any attachments to those responses, which related to his adjustments. Mr. Johnson also provided inputs to Cities' adjusted CCOS model, which is included as WP KJN-1 in the Direct Testimony of Karl Nalepa.

Prepared by: Clarence Johnson

Sponsored by: Clarence Johnson

**CITIES' RESPONSE TO AEP TEXAS' FIRST RFI**

**RESPONSE OF CITIES' WITNESS KARL NALEPA:**

- a. Refer to Attachment KJN-2 in the Direct Testimony of Karl Nalepa.
- b. Refer to Attachment KJN-2, which lists Mr. Nalepa's expert testimony by commission, docket number, date, client, utility, phase, and issues addressed. The public versions of these testimonies are readily accessible on the applicable jurisdiction's website. Mr. Nalepa has no articles, speeches, published materials, or peer review materials responsive to this request.
- c. Refer to the Direct Testimony of Karl Nalepa at 13 for this information.
- d. Mr. Nalepa reviewed AEP Texas' RFP, including its schedules and workpapers, witness testimony, 45-day update, and discovery responses. Mr. Nalepa also reviewed Cities' witness Lane Kollen's workpapers supporting Cities' recommended adjustments to the Company's requested change in base rates. These documents have all been provided by AEP Texas or included in the Direct Testimony of Lane Kollen.

Prepared by: Karl Nalepa

Sponsored by: Karl Nalepa

**RESPONSE OF CITIES' WITNESS LANE KOLLEN:**

- a. Refer to Attachment LK-1 in the Direct Testimony of Lane Kollen.
- b. Refer to Attachment LK-1, which lists Mr. Kollen's expert testimony by date, case, jurisdiction, client, utility, and issues addressed. The public versions of these testimonies are readily accessible on the federal and state jurisdictions' website. Mr. Kollen has no articles, speeches, published materials, or peer review materials responsive to this request.
- c. Refer to the Direct Testimony of Lane Kollen at 68.
- d. Mr. Kollen reviewed AEP Texas' RFP, including its schedules and workpapers, and witness testimony. In addition, Mr. Kollen reviewed all discovery requests to the Company and responses from the Company in this proceeding that were relevant to the subject areas addressed in his testimony. These responses were accessed through the Commission's electronic docketing system.

Prepared by: Lane Kollen

Sponsored by: Lane Kollen

**CITIES' RESPONSE TO AEP TEXAS' FIRST RFI**

**RESPONSE OF CITIES' WITNESS DAVID GARRETT:**

- a. Refer to Attachment DJG-1 in the Direct Testimony of David Garrett and <http://www.resolveuc.com/representative-engagements>.
- b. Refer to Attachment DJG-1 and <http://www.resolveuc.com/representative-engagements>, which list Mr. Garrett's expert testimony by regulatory agency, utility, docket number, issues addressed, and client. The public versions of these testimonies are readily accessible on the applicable jurisdiction's website, as well as <http://www.resolveuc.com/representative-engagements>. Mr. Garrett has no articles, speeches, published materials, or peer review materials responsive to this request.
- c. Refer to the Direct Testimony of David Garrett at 26.
- d. Mr. Garrett reviewed AEP Texas' depreciation study, the Direct Testimony and Exhibits of Jason Cash, and AEP Texas' Response to Cities' Fifth RFI in this proceeding. Mr. Garrett also reviewed the Direct Testimony of Nancy Hughes and the Final Order in Docket No. 49494, as well as the California Public Utilities Commission's decision in Pacific Gas and Electric Company's 2014 rate case. Refer to Appendices A, B, and C for any other sources that Mr. Garrett relied upon for the depreciation system he used in this case. These sources are publicly available.

Prepared by: David Garrett

Sponsored by: David Garrett

**RESPONSE OF CITIES' WITNESS RANDY WOOLRIDGE:**

- a. See Attachment AEP Texas 1-2(a) – JRWoolridge Rate Cases 2019-2024 provided with this Response.
- b. Refer to Attachment AEP Texas 1-2(a) – JRWoolridge Rate Cases 2019-2024, which lists Dr. Woolridge's expert testimony by utility, state, client, year, and docket number. The public versions of these testimonies are readily accessible on the applicable jurisdiction's website. Dr. Woolridge has no articles, speeches, published materials, or peer review materials responsive to this request.
- c. Refer to the Direct Testimony of Randy Woolridge at 100.
- d. See Dr. Woolridge's response to AEP Texas 1-1.

Prepared by: Randy Woolridge

Sponsored by: Randy Woolridge



J. Randall Woolridge - Rate Cases - 2019-2024				
Atmos Gas	TX	ATM	2019	GUD No. 10779
Atmos Gas	KS	CURB	2019	Docket No. 19-ATMG-525-RTS
National Grid Electric	MA	Attorney General	2019	D. P. U. 18-150
Empire District Electric	KS	CURB	2019	KCC DOCKET NO. 19-EPDIE-223-RTS
Centerpoint Houston Energy Electric	TX	TCC	2019	CASE NO. PUR-2019-00050
NIPSCO	IN	OCC	2019	IURC Cause No. 45159
Piedmont Gas	NC	Attorney General	2019	Docket No. G-9, Sub 743
Washington Gas Light Co.	MD	OPC	2019	Case No. 9605
NETOs	FERC	Attorney General	2019	EL 11-66, EL 13-33, EL 14-86, EL 16-64
Baltimore Gas & Electric Company	MD	OPC	2019	Case No. 9610
Dominion Energy North Carolina	NC	Public Staff	2019	Docket No. E-22, SUB 562
Virginia Electric and Power Company	VA	Consumer Counsel	2019	CASE NO. PUR-2019-00050
Liberty Utilities Corp. (Granite State Electric)	NH	Staff	2019	Docket No. DE 19-064
Public Service of New Hampshire d/b/a Eversource	NH	Staff	2019	Docket No. DE 19-057
Southwest Gas Corporation	AZ	AZ Grain	2020	Docket No. G-01551A-19-0055
Duke Energy Carolinas, LLC	NC	Public Staff	2020	DOCKET NO. E-7, SUB 1214
CenterPoint Energy Resources Corporation	TX	ACM	2020	GUD NO. 10920
Southwestern Public Service Company	TX	AXM	2020	Docket No. 49831
Duke Energy Progress, LLC	NC	Public Staff	2020	DOCKET NO. E-2, SUB 1219
Appalachian Power Company	VA	Attorney General	2020	SCC Case No. PUR-2020-00015
Baltimore Gas & Electric Company	MD	OPC	2020	Case No. 9645
Delmarva Power & Light Co.	MD	OPC	2020	Case No. 9630
PATH	FERC	MD OPC	2020	ER09-1256-003
NSTAR Gas Company	MA	Attorney General	2020	D.P.U. 19-120
Rocky Mountain Power Company	UT	OCS	2020	Docket No. 20-035-04
Montana-Dakota Utilities Co	MT	Consumer Counsel	2020	Docket No. 2020.06.076
Puget Sound Energy	WA	Public Counsel	2020	Docket Nos. UE-190529 and UG-190530
Potomac Electric Power Company	MD	People's Counsel	2021	Case No. 9655
Liberty Utilities Corp. (Energy North Gas)	NH	Staff	2021	Docket No. DG 20-105
Southwestern Electric Power Company	TX	CARD	2021	PUC Docket No. 51415
Connecticut Water Company	CT	Consumer Counsel	2021	Docket No. 20-12-30
National Grid Gas	MA	Attorney General	2021	D.P.U. 20-120
Florida Power & Light	FL	OPC	2021	Docket No. 20210015-EL
Black Hills Energy	KS	CURB	2021	Docket No. 21-BDCG-418-RTS
Dominion Energy South Carolina, Inc.	SC	ORS	2021	Docket No. 2020-125-E
Virginia Electric & Power Company	VA	OAG	2021	Case No. PUR-2021-00058
Avista Corporation	WA	Public Counsel	2021	Docket Nos. UE-200900/UG-200901
Cascade Natural Gas Corporation	WA	Public Counsel	2021	Docket No. UG-200568
Northwest Natural Gas Company	WA	Public Counsel	2021	Docket No. UG-200994
Aquarion Water Company	CT	OCC	2022	Docket No. 22-07-01
Eversource Energy	MA	AG	2022	D.P.U. 22-22
Columbia Gas of Maryland	MD	OPC	2022	Case No. 9680
Northern Utilities, Inc.	NH	Staff	2022	Docket No. DG 21-104
New Mexico Gas Company	NM	AG	2022	Case No. 21-00267-UT
Nova Scotia Power	NS	Board	2022	Case - M10431
Duke Energy Ohio, Inc.	OH	Consumer Counsel	2022	Case No. 21-887-EL -ADR, et al.
Oncor Electric Delivery Company, LLC	TX	Cities	2022	PUC Docket No. 53601
City of Round Rock Water Company	TX	Cities	2022	Docket No. 48836
Puget Sound Energy	WA	Public Counsel	2022	Docket Nos. UE-220066 & UG-220067
Ca. Energy Companies Cost of Capital Report	CA	Public Advocates	2022	Ca. Energy Co.'s Cost of Capital Report
Atmos Gas	KS	CURB	2023	Docket No. 23-ATMG-359-RTS
Central Maine Power Company	ME	Staff	2023	Docket No. 2022-00152
Versant Power Company	ME	Staff	2023	Docket No. 2022-00255
Montana-Dakota Utilities Co	MT	Consumer Counsel	2023	Docket No. 2022.11.099
Public Service Company of Oklahoma	OK	AG	2023	CASE NO. PUD 2022-000093
PacifiCorp	CA	Public Advocates	2023	Application No. 22-05-006
The United Illuminating Company	CT	Consumer Counsel	2023	Docket No. 22-08-08
Southwestern Public Service Company	NM	AG	2023	Case No. 22-00270-UT
SilEnergy LP	TX	AXM	2023	Case No. 00013504
Bear Valley Electric Service, LLC	CA	Public Advocates	2023	Application 22-08-010
Southwestern Public Service Company	TX	AXM	2023	PUC Docket No. 54634
Northern Utilities, Inc.	ME	Staff	2023	MPUC Docket No. 2023-00051
Baltimore Gas & Electric Company	MD	OPC	2023	Case No. 9692
Appalachian Power Company	VA	Attorney General	2023	PUR-2023-00002
Atmos Texas Pipeline	TX	ATM	2023	Docket No. 00013758
Public Service Company of New Mexico	NM	AG	2023	Case No. 22-00270-UT
Eversource Energy	KS	CURB	2023	Docket No. 23-EKCE-775-RTS
PacifiCorp	WA	Public Counsel	2023	Docket No. UE-230172
Connecticut Water Company	CT	Consumer Counsel	2023	Docket No. 23-08-32
Potomac Electric Power Company	MD	OPC	2023	Case No. 9702
New Mexico Gas Company	NM	AG	2023	Case No. 23-00255-UT
CenterPoint Energy Resources Corp.	TX	Cities	2024	Case No. OS-00015513
Connecticut Natural Gas Company	CT	Consumer Counsel	2024	Docket No. 23-11-02
Pitchburg Gas & Electric Light Company	MA	AG	2024	Docket Nos. D.P.U. 23-80/23-81
National Grid	MA	AG	2024	Docket No. D.P.U. 23-150

The following files are not convertible:

WP AEP Texas 1-1 - CLJ CCOS Model.xlsx

Please see the ZIP file for this Filing on the PUC Interchange in order to access these files.

Contact [centralrecords@puc.texas.gov](mailto:centralrecords@puc.texas.gov) if you have any questions.