



## **Filing Receipt**

**Filing Date - 2025-03-24 02:38:44 PM**

**Control Number - 57172**

**Item Number - 61**

**SOAH DOCKET NO. 473-25-05322  
PUC DOCKET NO. 57172**

<b>COMMISSION STAFF'S PETITION TO</b>	<b>§</b>	<b>BEFORE THE STATE OFFICE</b>
<b>ESTABLISH A SECONDARY CAP ON</b>	<b>§</b>	
<b>PERFORMANCE BONUSES UNDER 16</b>	<b>§</b>	<b>OF</b>
<b>TAC § 25.182(e) FOR THE 2024</b>	<b>§</b>	
<b>PROGRAM YEAR</b>	<b>§</b>	<b>ADMINISTRATIVE HEARINGS</b>

**COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION  
TO SOUTHWESTERN ELECTRIC POWER COMPANY  
QUESTION NOS. STAFF 2-1 THROUGH 2-3**

Pursuant to 16 Texas Administrative Code (TAC) § 22.144 of the Commission's Procedural Rules, the Staff of the Public Utility Commission of Texas requests that Southwestern Electric Power Company (SWEPCO) and through its attorneys 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. Please copy the question immediately above the answer to each question. These question(s) 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 Docket No. 50664.

Dated: March 24, 2025

Respectfully Submitted,

**PUBLIC UTILITY COMMISSION OF TEXAS  
ENERGY EFFICIENCY DIVISION**

Ramya Ramaswamy  
Division Director

**PUBLIC UTILITY COMMISSION OF TEXAS  
MARKET ANALYSIS DIVISION**

Harika Basaran  
Division Director

/s/ R. Floyd Walker

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**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 24, 2025, in accordance with the Second Order Suspending Rules, issued in Project No. 50664.

s/ R. Floyd Walker  
R. Floyd Walker

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**COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION  
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QUESTION NOS. STAFF 2-1 THROUGH 2-3**

**DEFINITIONS**

- 1) "SWEPCO" or "you" refers to Southwestern Electric Power Company and any person acting or purporting to act on their behalf, including without limitation, attorneys, agents, advisors, investigators, representatives, employees, contractors, 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 the Company's 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.
- 3) "Peak Period" is defined in accordance with 16 TAC § 25.181(c)(46), which defines it as "the hours from one p.m. to seven p.m. during the months of June, July, August, and September, and the hours of six a.m. to ten a.m. and six p.m. to ten p.m. during the months of December, January, and February, excluding weekends and Federal holidays."

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**COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION  
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QUESTION NOS. STAFF 2-1 THROUGH 2-3**

**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.
- 9) To the extent that a request for information is answered by providing the results of a database query, please provide the results of the database query in an EXCEL spreadsheet, a copy of the query used to extract the data from the database in Structured Query Language (SQL), if applicable, and a copy of the schema for the database that was the source of the data, if applicable.

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QUESTION NOS. STAFF 2-1 THROUGH 2-3**

- Staff 2-1** With reference to the chart on page 14 of the Direct Testimony of Jay Zarnikau, for SWEPCO's load please provide the total load and load weighted average real time energy wholesale market (where SWEPCO participates) settlement prices for the Peak Periods between December 2013 and February 2024. *See, e.g., Exhibit ALD-R2, Rebuttal Testimony of Andrew L. Dornier, Docket No. 52067, Application of Energy Texas, Inc. to Adjust its Energy Efficiency Cost Recovery Factor and Request to Establish Revised Cost Caps* (Aug. 6, 2021).
- Staff 2-2** With reference to the charts on page 13 of the Direct Testimony of Jay Zarnikau, for load served by SWEPCO, please provide summer peak demand forecast for years 2024 through 2032.
- Staff 2-3** With reference to the charts on page 13 of the Direct Testimony of Jay Zarnikau, for load served by SWEPCO, please provide annual energy forecast for years 2023 through 2029.