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**SOAH DOCKET NO. 473-25-18476
PUC DOCKET NO. 58014**

APPLICATION OF SOUTHWESTERN	§	BEFORE THE STATE OFFICE OF
ELECTRIC POWER COMPANY TO	§	ADMINISTRATIVE HEARINGS
ADJUST ENERGY EFFICIENCY COST	§	
RECOVERY FACTOR AND RELATED	§	
RELIEF	§	

**COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION TO
SOUTHWESTERN ELECTRIC POWER COMPANY
QUESTION NOS. STAFF 2-1 THROUGH STAFF 2-9**

Pursuant to 16 Texas Administrative Code (TAC) § 22.144 of the Commission's Procedural Rules, the Staff (Staff) of the Public Utility Commission of Texas (Commission) requests that Southwestern Electric Power Company by and through its representative 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 or within 20 days if the Presiding Officer has not provided a time limit. Please copy the question immediately above the answer to each question. 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. 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 Project No. 50664.

Dated: May 9, 2025

Respectfully submitted,

**PUBLIC UTILITY COMMISSION OF TEXAS
LEGAL DIVISION**

Marisa Lopez Wagley
Division Director

Andy Aus
Managing Attorney

/s/ Dylan King _____
Dylan King
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**SOAH DOCKET NO. 473-25-18476
PUC DOCKET NO. 58014**

CERTIFICATE OF SERVICE

I certify that unless otherwise ordered by the presiding officer, notice of the filing of this document will be provided to all parties of record via electronic mail on May 9, 2025 in accordance with the Second Order Suspending Rules, issued in Project No. 50664.

/s/ Dylan King _____
Dylan King

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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, 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 your 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.

DOCKET NO. 58014

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QUESTION NOS. STAFF 2-1 THROUGH STAFF 2-9**

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.

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QUESTION NOS. STAFF 2-1 THROUGH STAFF 2-9**

- Staff 2-1** Refer to Schedule A workpaper.
- a. Please show totals by sector with accompanying formulas intact.
 - b. Regarding proposed annual budget for 2026:
 - i. Please provide in Excel format, with formulas intact, a detailed breakdown of the proposed administrative costs included in the application.
 - ii. Please provide in Excel format, with formulas intact, a detailed breakdown of the proposed research and development costs included in the application.
 - iii. Please provide all applicable contracts for proposed research and development and administrative costs included in the application.
- Staff 2-2** Refer to Schedule B workpaper.
- a. Please show totals by sector with accompanying formulas intact.
 - b. Please provide invoices for all 2024 administrative expenses included in the application.
 - c. Please provide in Excel format, with formulas intact, a detailed breakdown and summary of the internal administrative costs included in the application including totals.
 - d. Please provide invoices for all 2024 research and development expenses included in the application.
 - e. Please provide in Excel format, with formulas intact, a detailed breakdown and summary of internal research and development costs included in the application including totals.
- Staff 2-3** Refer to Schedule D workpaper.
- a. Step 1 Fixed Inputs Tab; please indicate the docket/item number for the rate proceeding where the Utility Specific Discount Rate (WACC) was determined.
 - b. EECRF Templates Tab; please label the table with appropriate program year date.
- Staff 2-4** Refer to Schedule J of the application.
- a. Please provide in Excel format a summary spreadsheet with formulas intact listing total incentive expense by EESP (and corresponding percentage amounts) for EESPs receiving more than 5% of incentive funds for 2024.

- Staff 2-5** Refer to Schedule L of the application.
- a. Please provide in Excel format the list of all energy efficiency service providers that participated in the utility programs and contractors paid with funds collected through the EECRF. Such information may be treated as confidential per §25.182 (d)(10)(K).
- Staff 2-6** Refer to Schedule P workpaper.
- a. Please provide Schedule P workpaper with formulas intact.
- Staff 2-7** Refer to Schedule S workpaper.
- a. Please explain the discrepancy and clarify the reported actual demand reduction at the meter value for 2024; Reported vs. Verified Savings Tab lists the value as 10,800 kW at the meter and the Historical Demand Energy Goals tab lists the value as 11.51 MW at the meter.
 - b. On the By-County tab, please provide missing data labels for Columns AB and AC.
- Staff 2-8** Refer to Exhibit RWP-1.
- a. Please provide in Excel format a summary spreadsheet with formulas intact listing invoice totals and total overall spend for proceeding expenses as described in George Hoyt's Affidavit (page 55 of the PDF, page 5 of the affidavit).
- Staff 2-9** Refer to Confidential Identification Notice workpapers.
- a. Please show totals with formulas intact on Excel spreadsheet.