

Control Number: 50284



Item Number: 28

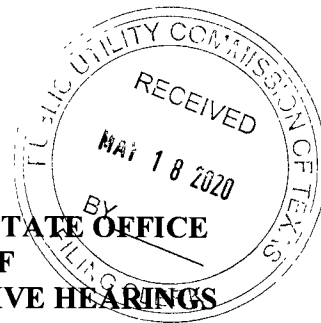
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**SOAH DOCKET NO. 473-20-3116  
PUC DOCKET NO. 50284**

**COMPLAINT OF JAIME LEONARDO  
SLOSS AGAINST AEP TEXAS INC.**

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**BEFORE THE STATE OFFICE  
OF  
ADMINISTRATIVE HEARINGS**



**COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION  
TO JAIME LEONARDO SLOSS  
QUESTION NOS. STAFF 1-1 THROUGH 1-13**

Pursuant to 16 Texas Administrative Code (TAC) § 22.144 of the Commission's Procedural Rules, the Staff of the Public Utility Commission of Texas (Staff) requests that Jaime Leonardo Sloss (Complainant) and through its attorneys of record, provide the following information and answer the following question(s) under oath. The question(s) 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 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 Order Suspending Rules in Docket No. 50664.

Dated: May 18, 2020

Respectfully submitted,

**PUBLIC UTILITY COMMISSION OF TEXAS  
LEGAL DIVISION**

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Managing Attorney

/s/ Daniel Moore  
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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 May 18, 2020, in accordance with the Order Suspending Rules, issued in Project No. 50664.

/s/ Daniel Moore  
Daniel Moore

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**COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION  
TO JAIME LEONARDO SLOSS  
QUESTION NOS. STAFF 1-1 THROUGH 1-13**

**DEFINITIONS**

- 1) "Complainant" or "you" refers to Jaime Leonard Sloss 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 the Complainant'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.

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**COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION  
TO JAIME LEONARDO SLOSS  
QUESTION NOS. STAFF 1-1 THROUGH 1-13**

**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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**COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION**  
**TO JAIME LEONARDO SLOSS**  
**QUESTION NOS. STAFF 1-1 THROUGH 1-13**

- Staff 1-1      Please admit or deny that you have lived at the same address from September 3, 2016 to the present. If deny, please provide each address where you have lived and the dates you lived there.
- Staff 1-2      Referencing the Complaint at paragraph 5, please provide any report or other written summary of your electrical engineer's findings.
- Staff 1-3      Please provide a list of each issue with electric delivery service that you reported to AEP Texas between September 3, 2016 and the present, including the following;
- a. The date you contacted AEP Texas regarding the issue;
  - b. The name of the person you spoke with;
  - c. A description of the service issue you reported; and
  - d. A summary of the actions taken by AEP Texas in response to your call.
- Staff 1-4      For each issue with electric service delivery reported to AEP Texas, please identify the portions of the AEP Texas Central Division tariff that you believe apply to the issue.
- Staff 1-5      Please identify and describe any instance between September 3, 2016 and the present where AEP Texas unreasonably withheld, conditioned, or delayed its performance of any obligation or duty imposed under the AEP Texas Central Division tariff.
- Staff 1-6      Please identify and describe any instance between September 3, 2016, and the present where AEP Texas unreasonably withheld, conditioned, or delayed giving any consent required for another party to exercise rights that are conferred under the AEP Texas Central Division tariff but made subject to that consent?
- Staff 1-7      For each issue with electric service delivery reported to AEP Texas, please identify the provisions of the Public Utility Regulatory Act or the Commission's rules that you believe apply to the issue.
- Staff 1-8      Please identify each date that an AEP Texas service technician visited your residence and provide a copy of any written report or other written document provided to you by the service technician during each visit.
- Staff 1-9      Please admit or deny that each AEP Texas service technician, or other representative of AEP Texas, who accessed the premises of your residence

complied with § 5.4.8 of the AEP Texas Central Division tariff. If deny, please provide the date the technician accessed the premises and describe the specific actions the technician took in violation of this tariff provision.

- Staff 1-10 Please provide a copy of any document you have received from AEP Texas between September 3, 2016 and the present regarding issues with electric delivery service, including emails or other written communication. Please do not include any documents related to the case you have filed against AEP Texas in District court.
- Staff 1-11 Regarding the electrical shock you experienced on September 3, 2016, please:
- a. Identify the cause of the electrical service issue that led to the shock; and
  - b. Confirm whether the issue was on AEP's side of the point of delivery or your side of the point of delivery.
- Staff 1-12 Please provide a list of the physical damage, if any, that was done to your residence, electrical facilities in your residence, or your person as a result of electrical service on September 3, 2016. Physical damage to your person includes visible damage such as cuts, bruises, broken bones, etc.
- Staff 1-13 Please admit or deny that AEP Texas informed you of your right to file a complaint with the Commission and provided you the Commission's contact information.