

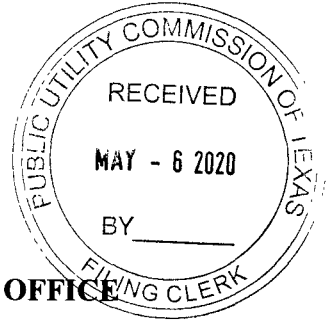


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**SOAH DOCKET NO. 473-20-3300
PUC DOCKET NO. 50733**

**APPLICATION OF AEP TEXAS INC. § BEFORE THE STATE OFFICE
TO AMEND ITS DISTRIBUTION § OF
COST RECOVERY FACTOR § ADMINISTRATIVE HEARINGS**

**COMMISSION STAFF'S THIRD REQUEST FOR INFORMATION
TO AEP TEXAS INC.
QUESTION NO. STAFF 3-1 THROUGH STAFF 3-2**

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 AEP Texas Inc. by and through their 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 an original and three copies of your answers to the questions to the Filing Clerk, Public Utility Commission of Texas, 1701 N. Congress Avenue, P.O. Box 13326, Austin, Texas 78711-3326.

Dated: May 6, 2020

Respectfully submitted,

**PUBLIC UTILITY COMMISSION OF TEXAS
LEGAL DIVISION**

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/s/ Rustin Tawater
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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 6, 2020, in accordance with the Order Suspending Rules, issued in Project No. 50664.

/s/ Rustin Tawater
Rustin Tawater

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**COMMISSION STAFF'S THIRD REQUEST FOR INFORMATION
TO AEP TEXAS INC.
QUESTION NO. STAFF 3-1 THROUGH STAFF 3-2**

DEFINITIONS

- 1) "AEP Texas" or "you" refers to AEP Texas Inc.. 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 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.

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**COMMISSION STAFF'S THIRD REQUEST FOR INFORMATION
TO AEP TEXAS INC.
QUESTION NO. STAFF 3-1 THROUGH STAFF 3-2**

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 THIRD REQUEST FOR INFORMATION
TO AEP TEXAS INC.**

QUESTION NO. STAFF 3-1 THROUGH STAFF 3-2

Staff 3-1 Please provide the FERC accounts utilized for these Project IDs.

EDN100063	EDN100063 TC-Pole Reinforcement - Reinforcement of AEP Texas owned poles resulting from inspections for ground rotting.
EDN100065	EDN100065 TN-Pole Replacement - Replacement/reinforcement of AEP Texas owned poles resulting from inspections for ground rotting - Identification of units to be replaced is a result of the groundline inspection program.
EDN100067	EDN100067 TC-Pole Replacement - Replacement of AEP Texas owned poles resulting from inspections for ground rotting - Identification of units to be replaced is a result of the groundline inspection program.

Staff 3-2 Please provide a complete and detailed explanation on why AEP has included the following spare transformers in this DCRF application. Please provide the FERC accounts used for the Project IDs.

A16921050	A16921050 Spare Mobile - 138/12.47kV 50M - Purchased 50MVA, 138KV to 12KV mobile substation.
A16921052	A16921052 Purchase Spare Skid Transformer - Purchase a spare substation transformer for use with a Skid Substation.
A16921055	A16921055 Purchase Spare Transformer - Purchase a spare substation transformer as part of the Purchase/Rebuild Major Equipment Program