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Addendum StartPage: 0

PUC DOCKET NO. **149553**

NON-STANDARD TRUE-UP FILING  
OF AEP TEXAS INC. PURSUANT TO  
THE FINANCING ORDER IN  
DOCKET NO. 32475

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PUBLIC UTILITY COMMISSION

OF  
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PETITION

MAY 23, 2019

TABLE OF CONTENTS

SECTION	FILENAME	PAGE
Petition	Petition.TC2.May19.pdf	2
Appendix A	Appendix A 2019.pdf	10
Appendix B	S Jones TC-2 Nonstandard Trueup5-2019F.pdf; Exhibit SGJ-1 and WP TC-2 rates 5-19f.xls; Exhibit SGJ-2 - Rider TC2 9-19 Rates.pdf	12
Appendix C	Appendix C 2019.pdf	29
Appendix D	Appendix D 2019.pdf	34
Appendix E	Appendix E_Protective Order 2019.pdf	36
Workpapers	Exhibit SGJ-1 and WP TC-2 rates 5-19f.xls	53

**PUC DOCKET NO. \_\_\_\_\_**

**NON-STANDARD TRUE-UP FILING     §     PUBLIC UTILITY COMMISSION  
OF AEP TEXAS INC. PURSUANT TO     §  
THE FINANCING ORDER IN     §     OF  
DOCKET NO. 32475     §     TEXAS**

**PETITION**

AEP Texas Inc. (AEP Texas or Company) is making this Non-standard True-up Filing as the servicer of Transition Bonds issued pursuant to the Financing Order by the Public Utility Commission of Texas (PUC, PUCT or Commission) in Docket No. 32475, *Application of AEP Texas Central Company for A Financing Order* (June 21, 2006). AEP Texas makes this filing on its own behalf, and on behalf of any successor servicers, which may include any successors and assigns that on a future date provide transmission and distribution service directly to customers taking service at facilities, premises or loads located within AEP Texas' service area.

Effective December 31, 2016, AEP Texas Central Company (TCC) and AEP Texas North Company (TNC) were merged into their parent company, now called AEP Texas. The merger was approved by the Commission in Docket No. 46050 – *Application of AEP Texas Central Company, AEP Texas North Company, and AEP Utilities, Inc. for Approval of Merger*. The Commission ordered AEP Texas to “maintain separate TCC and TNC divisions, which will continue to charge separate rates and riders, and maintain separate tariffs, unless and until such time as the Commission may consider and approve consolidated rates and tariffs.”<sup>1</sup> Consistent with the Commission's order, AEP Texas is maintaining two divisions within AEP Texas: AEP Texas – Central Division (formerly TCC) and AEP Texas – North Division (formerly TNC). Therefore, this filing only impacts the central division of AEP Texas.

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<sup>1</sup> Docket No. 46050, *Application of AEP Texas Central Company, AEP Texas North Company, and AEP Utilities, Inc. for Approval of Merger*, Final Order at Ordering Paragraph No. 2 (Dec. 12, 2016).

### **I. Business Address**

AEP Texas' business address and telephone number are:

539 North Carancahua Street  
Corpus Christi, Texas 78401  
Telephone: (361) 881-5387  
Facsimile: (361) 881-5600

### **II. Authorized Representatives**

AEP Texas' authorized representative for service of all pleadings and other documents is:

Steven Beaty  
AEP Texas Inc.  
400 West 15<sup>th</sup> Street, Suite 1520  
Austin, Texas 78701  
Telephone: (512) 481-4550  
Facsimile: (512) 481-4591  
e-mail: sjbeaty@aep.com

AEP Texas' authorized legal representatives are:

Rhonda Ryan  
Melissa Gage  
American Electric Power Service Corporation  
400 West 15<sup>th</sup> Street, Suite 1520  
Austin, Texas 78701  
Telephone: (512) 481-3320  
Facsimile: (512) 481-4591  
e-mail: rcryan@aep.com  
e-mail: magage@aep.com

### **III. Jurisdiction**

AEP Texas is an electric utility, as Public Utility Regulatory Act § 31.002(a) defines that term, and AEP Texas or its successor wires company is the servicer of the Transition Bonds issued pursuant to the Financing Order in Docket No. 32475 (the Financing Order). Further, the Commission has jurisdiction over the Company's Non-standard True-up Filing pursuant to Sections 39.003 and 39.307 of PURA. This filing is made in compliance with Findings of Fact 95-97 and Ordering Paragraph 12 of the Financing Order. The Non-standard True-up will affect amounts billed for energy consumption and demand of retail

customers taking retail transmission and/or distribution service from the Company and its successor wires company and to the facilities, premises and loads of such retail customers.

#### **IV. Background**

On June 21, 2006, the Commission approved the Financing Order, which authorized the issuance of Transition Bonds in an amount not to exceed \$1,696,620,385, and the recovery of costs associated with such bonds. TCC issued Transition Bonds pursuant to the Financing Order on October 11, 2006, and began billing transition charges (TC-2s) on October 12, 2006.

The Financing Order provides that retail electric customers must pay the principal, interest and related costs of the Transition Bonds through TC-2s, pursuant to the form of tariff approved in the Financing Order. The Financing Order establishes how the annual costs permitted to be recovered through TC-2 rates are allocated among TC-2 customer classes. In Findings of Fact 95-97, the Financing Order also sets out a procedure for adjusting the TC-2 rates to each customer class if the forecasted billing determinants for any one of the classes for an upcoming period decrease by more than 10 percent compared to the threshold billing determinants established for the annual period ending August 31, 2005. This procedure is called the Non-standard True-up. The billing determinants for the year 14 billing period (September 2019 – August 2020) for the Commercial and Small Industrial-Energy (Commercial Energy) and the Municipal and Cotton Gin TC-2 classes are forecasted to decrease by more than 10 percent compared to threshold billing determinants.

This filing is being made to comply with the procedures in the Financing Order for making a Non-standard True-up that, among other things, require that this filing be made 90 days in advance of the proposed effective date of the Non-standard True-up. This filing is being made 90 days prior to the first billing cycle for September 2019 so that the TC-2 rates applied to the various retail customer classes will reflect the allocation contemplated by the Non-standard True-up provisions of the Financing Order.

The final bond payment according to the amortization schedule will be on July 1, 2020. The Company proposes to stop billing Rider TC-2 rates after the last billing cycle of the June 2020 billing month or sooner if the Company determines that TC-2 collections are

sufficient to pay the last bond payment in full on July 1, 2020, including estimates of any other remaining costs. However, it may be necessary for the Company to make an Interim True-up filing if it determines that TC-2 collections are insufficient to make either of the last two bond payments on January 1, 2020 or July 1, 2020. The Company will determine the final reconciliation amount including any refund balance due to customers (REPs) after July 1, 2020.

## **V. Required Showing**

Finding of Fact 97 in the Financing Order requires AEP Texas to make the Non-standard True-up filing at least 90 days before the proposed true-up adjustment is to take effect. AEP Texas proposes that the adjustment be effective for bills rendered beginning on August 28, 2019, which is the date upon which the bills for the first cycle for the month of September 2019 will be rendered.

The proposed transition charge rates are set out in proposed revised Rider 6.1.1.2.2.1, Initial/Adjusted Transition Charge Rates – Rider TC-2, which is attached hereto as Appendix A, and application of those rates is also governed by Rate Schedule 6.1.1.2.2, Transition Charge Rates – Schedule TC-2, which is unchanged. Calculation of the TC-2 rates is addressed in the testimony of Ms. Shawna G. Jones attached hereto as Appendix B.

The justification for applying the Non-standard True-up is that the Commercial Energy and Municipal and Cotton Gin Energy classes are demonstrating lower than forecasted kWh usage. The projected consumption for the Commercial Energy TC-2 class is 1,963,854,692 kWh, which is lower than the 90% threshold of 2,641,657,543 kWh in the Financing Order in Docket No. 32475. In her testimony, Ms. Jones identifies three factors influencing this lower usage. The first factor is that a large portion of the customers in this class were existing customers prior to unbundling who were receiving service under energy-only tariff schedules. These customers were assigned to the Commercial Energy TC-2 class and were frozen from moving out of the class; however, these are typically older accounts and many have either terminated service completely, have been demolished and have been replaced by new more modern loads, or have simply just reduced their consumption, probably affected by the current economic conditions.

The second factor is that the remaining customers comprising this class are new customers taking service under the current Secondary Voltage Service  $\leq 10$  kW. As the open Texas market has evolved, customers taking service under this tariff schedule may not demonstrate as high a kWh consumption pattern as the old accounts that have terminated.

A final and significant factor is that the Commission's new pro-forma tariff schedules define the limit at 10 kW for new customers in the determination if the customers should be billed on an energy-only based tariff schedule or a demand-based tariff schedule. Prior to deregulation, it was the customer's usage characteristics rather than demand that determined the type of tariff schedule that was most appropriate for the customer. Now, under the new pro-forma tariffs, new customers tend to qualify for service on the Secondary Voltage Service  $> 10$  kW distribution rate class. New Secondary Voltage Service  $> 10$  kW distribution rate class customers are assigned the Commercial and Small Industrial-Demand TC-2 rate, which uses the customer's demands for billing purposes. No new Secondary Voltage Service  $> 10$  kW distribution rate class customers are allowed to be billed on the Commercial Energy TC-2 class charges.

Additionally, the projected consumption for the Municipal and Cotton Gin Energy TC-2 class is 438,253,777 kWh, which is slightly lower than the 90% threshold of 448,761,975 kWh in the Financing Order in Docket No. 32475.

Additional support for the filing is contained in the testimony of Ms. Jones. For convenience, Appendix C contains the referenced Findings of Fact and Ordering Paragraph from the Financing Order.

## **VI. Scope of Proceeding, Procedural Schedule**

Finding of Fact 95 of the Financing Order states that the scope of the proceeding is limited to determining whether the proposed adjustment complies with the Financing Order. That finding also directs the Commission to conduct a contested case proceeding pursuant to PURA § 39.003. Since this proceeding is limited in scope and is intended to be resolved in 90 days, AEP Texas proposes that a schedule be established similar to that required for fuel factor change proceedings which must be concluded within 90 days under Commission rules and that the schedule allow for the possibility of informal disposition pursuant to

Commission 16 Tex. Admin. Code § 22.35. This procedure was proposed in Docket No. 24775, *Non-Standard True-up Filing of AEP Texas Central Company Pursuant to the Financing Order in Docket No. 21528* (December 17, 2001) and has been used in all of AEP Texas' subsequent Non-standard True-up filings. Specifically, AEP Texas requests that a procedural schedule be established which will enable the Commission to issue its order in this proceeding within 60 days after the date of this petition if no hearing is requested within 30 days, and within 90 days after the date of this petition if a hearing is requested within 30 days of the filing of the petition, such hearing to be held no earlier than the first business day after the 45<sup>th</sup> day following filing of the petition.

#### **VII. Notice**

AEP Texas is notifying the parties to Docket No. 32475 of this filing by providing them with a copy of the notice set out in Appendix D. AEP Texas will also provide a copy of this filing to the Commission Staff and Office of Public Utility Counsel, and to other parties upon request. In addition, AEP Texas proposes that notice in the form set out in Appendix D be provided to all REPs who have been certified by the Commission to provide retail electric service in AEP Texas' service area, and to municipalities and cooperatives who serve customers in areas of dual certification with AEP Texas.

#### **VIII. Protective Order**

AEP Texas proposes that the proposed Protective Order attached hereto in Appendix E be issued in this proceeding. This proposed Protective Order is identical to that issued in Docket No. 24775, TCC's initial Non-standard True-up Proceeding, and in all subsequent TCC Non-standard True-up proceedings.

#### **IX. Requested Relief**

With the exception of the rates, the tariff set out in Appendix A has been approved by the Commission. AEP Texas requests the Commission to approve the TC-2 rates set out in Rider 6.1.1.2.2.1 Initial/Adjusted Transition Charge Rates – Rider TC-2. AEP Texas anticipates that effective with the first billing cycle for September 2019, the tariff in this



filing will supersede the tariff approved in Docket No. 48394. Also, the Company proposes to stop billing Rider TC-2 rates prior to July 2020 after it determines that TC-2 collections are sufficient to pay the last bond payment on July 1, 2020.

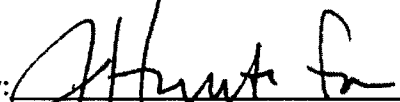
AEP Texas also requests (1) that a procedural schedule be established leading to Commission approval of the requested rates within 60 or 90 days, depending on whether a hearing is requested, (2) that the notice proposed by the Company be approved as to form, content and proposed distribution, (3) the requested Protective Order be issued, (4) that the tariff attached as Appendix A be approved, and (5) that AEP Texas be granted such other relief to which the Commission deems AEP Texas to be entitled.

Dated: May 23, 2019

RESPECTFULLY SUBMITTED,

American Electric Power Service Corporation  
400 West 15<sup>th</sup> Street, Suite 1520  
Austin, Texas 78701  
Rhonda Ryan  
State Bar No. 1747880  
Email: rcryan@aep.com  
Melissa Gage  
State Bar No. 24063949  
Email: magage@aep.com  
Telephone: (512) 481-3320  
Facsimile: (512) 481-4591

By:



Melissa Gage

ATTORNEY FOR AEP TEXAS INC.

**AEP TEXAS - CENTRAL DIVISION****TARIFF FOR ELECTRIC DELIVERY SERVICE**

Applicable: Certified Service Area previously served by AEP Texas Central Company

Chapter: 6 Section: 6.1.1

Section Title: Delivery System Charges

Revision: Nineteenth

Effective Date: August 28, 2019 |T

**6.1.1.2.2.1 Initial / Adjusted Transition Charge-2 Rates – Rider TC-2****AVAILABILITY**

This schedule is applicable to energy consumption and demands of retail customers taking service from the Company during the term that this schedule is in effect, and to the facilities, premises, and loads of all other retail customers obligated to pay TC-2 Charges as provided in Rate Schedule TC-2, Section 6.1.1.2.2.1. Terms defined in Rate Schedule TC-2 that are used herein shall have the same meaning as set forth in Rate Schedule TC-2.

**RATE CLASSES**

For purposes of billing Initial/Adjusted Transition Charge-2 Rates (TC-2 Rates), each retail end-use customer will be designated as a customer belonging to one of eight classes as identified and defined by Rate Schedule TC-2.

**TRANSITION CHARGE-2 RATES**

The Initial/Adjusted TC-2 Rates shall be determined in accordance with and are subject to the provisions set forth in Rate Schedule TC-2. Not less than 15 days prior to the first billing cycle for the Company's September billing month and no less frequently than annually thereafter, the Company or successor Servicer will file a Revision to Rider TC-2 setting forth the Adjusted TC-2 Rates to be effective for the upcoming period. If made as a result of the annual true-up adjustment in Rate Schedule TC-2, the Adjusted TC-2 Rates will become effective on the first billing cycle of the Company's September billing month. If an interim true up adjustment is made pursuant to Rate Schedule TC-2, the Adjusted TC-2 Rates will become effective on the first billing cycle of the Company's billing month that is not less than 15 days following the making of the interim true-up adjustment filing. If a Non-Standard True-Up filing pursuant to Rate Schedule TC-2 is made to revise the Rider TC-2, the filing will be made at least 90 days prior to the first billing cycle for the Company's September billing month.

**AEP TEXAS - CENTRAL DIVISION****TARIFF FOR ELECTRIC DELIVERY SERVICE**

Applicable: Certified Service Area previously served by AEP Texas Central Company

Chapter: 6 Section: 6.1.1

Section Title: Delivery System Charges

Revision: Nineteenth

Effective Date: August 28, 2019 |T

**6.1.1.2.2.1 Initial / Adjusted Transition Charge-2 Rates – Rider TC-2**

<b><u>Transition Charge-2 Customer Class</u></b>	<b><u>Initial/Adjusted TC-2 Rates</u></b>	
Residential	\$ .008816 per kWh	I
Commercial and Small Industrial – Energy	\$ .019294 per kWh	I
Commercial and Small Industrial – Demand	\$ 2.280098 per kW or kVa	R
Large Industrial – Firm	\$ .942781 per kW or kVa	R
Large Industrial – Non-Firm	\$ 2.258153 per kW or kVa	I
Standby – Firm	\$ .218750 per Daily kW or kVa	I
Standby – Non-Firm	\$ .325274 per Daily kW or kVa	I
Municipal and Cotton Gin	\$ .013931 per kWh	I

The Initial/Adjusted TC-2 Rates are multiplied by the kWh, kW or kVa, as applicable, read, estimated or determined during the billing month and will be applied to bills rendered on and after the effective date.

PUC DOCKET NO.  
PUBLIC UTILITY COMMISSION OF TEXAS  
NON-STANDARD TRUE-UP FILING  
OF  
AEP TEXAS INC.  
PURSUANT TO THE FINANCING ORDER  
IN DOCKET NO. 32475

DIRECT TESTIMONY OF  
SHAWNNA G. JONES  
FOR  
AEP TEXAS INC.  
MAY 23, 2019

TESTIMONY INDEX

<u>SUBJECT</u>	<u>PAGE</u>
I. INTRODUCTION .....	3
II. PURPOSE OF TESTIMONY .....	5
III. BACKGROUND .....	6
IV. NON-STANDARD TRUE-UP .....	7
V. PROPOSED TARIFFS .....	12
VI. CONCLUSION.....	12

EXHIBITS

EXHIBIT SGJ-1	Calculation of the TC-2s
EXHIBIT SGJ-2	Transition Charge Rates (Rider TC-2)
EXHIBIT SGJ-3	Rate Comparison

1 PUCT DOCKET NO. \_\_\_\_\_  
2 PUBLIC UTILITY COMMISSION OF TEXAS  
3 NON-STANDARD TRUE-UP FILING  
4 OF  
5 AEP TEXAS INC.  
6 PURSUANT TO THE FINANCING ORDER  
7 IN DOCKET NO. 32475  
8 DIRECT TESTIMONY OF  
9 SHAWNNA G. JONES  
10 FOR  
11 AEP TEXAS INC.  
12 MAY 23, 2019  
13  
14

15 I. INTRODUCTION  
16

17 Q. PLEASE STATE YOUR NAME, POSITION AND BUSINESS ADDRESS.

18 A. My name is Shawнна G. Jones. I am employed as a Staff Regulatory Consultant in  
19 the Regulated Pricing and Analysis Department, part of the American Electric Power  
20 Service Corporation (AEPSC) Regulatory Services Department. AEPSC is a  
21 subsidiary of American Electric Power Company, Inc. (AEP), as is AEP Texas Inc.  
22 (AEP Texas or Company). My business address is 212 East Sixth Street, Tulsa,  
23 Oklahoma 74119.

1 Q. PLEASE BRIEFLY DESCRIBE THE AEPSC REGULATORY SERVICES  
2 DEPARTMENT AND YOUR CURRENT JOB RESPONSIBILITIES.

3 A. AEPSC Regulatory Services is part of the AEP Utilities Business Group. Regulatory  
4 Services provides coordination and tariff-related services for the AEP operating  
5 utility companies, including AEP Texas. My current responsibilities include cost-of-  
6 service analysis, rate design, and tariff provisions for the four AEP West operating  
7 companies. I am also responsible for the preparation of, and support for, filings  
8 before the various state commissions under whose jurisdiction AEP or its subsidiaries  
9 provide service.

10 Q. PLEASE DESCRIBE YOUR EDUCATIONAL AND PROFESSIONAL  
11 EXPERIENCE.

12 A. I received a B.A. in Economics in 1988 from the University of Mississippi and a  
13 M.A. in Economics in 2002 from the University of Oklahoma. I also have an A.S. in  
14 Mathematics from Tulsa Community College. In addition to graduate courses in  
15 economics that include Advanced Public Utility Regulation from the University of  
16 Oklahoma, I have attended workshops sponsored by New Mexico State University's  
17 Center for Public Utilities that include the Basics of Regulation and Pricing  
18 Workshops and Edison Electric Institute's (EEI's) Electric Rate Advanced Course.

19 In 1989, I began employment with Public Service Company of Oklahoma  
20 (PSO) as a Customer Service Representative. In 1996, I accepted the position of  
21 Pricing and Costing Analyst with Central and South West Services, Inc. (CSWS). In  
22 2000, I accepted the position of Regulatory Consultant with AEPSC having since  
23 progressed to my current title of Staff Regulatory Consultant.



1 Q. HAVE YOU PREVIOUSLY PROVIDED TESTIMONY OR TESTIFIED BEFORE  
2 THIS OR OTHER UTILITY COMMISSIONS?

3 A. Yes, I have provided testimony in filings with this Commission including the TC-2  
4 Non-Standard True-up in May 2018 in PUCT Docket No.48394. I have also  
5 provided testimony in filings with the Louisiana Public Service Commission, the  
6 Oklahoma Corporation Commission, and the Arkansas Public Service Commission.

7

8 II. PURPOSE OF TESTIMONY

9 Q. PLEASE EXPLAIN THE PURPOSE OF YOUR TESTIMONY IN THIS FILING.

10 A. The purpose of my testimony in this filing is to support the calculation of transition  
11 charge (TC-2) rates by rate class pursuant to the Non-standard True-up provisions as  
12 approved in Docket No. 32475, Findings of Fact (FOF) 95 through 97 and support the  
13 tariff (Rider TC-2) revised in this filing.

14 Effective December 31, 2016, AEP Texas Central Company (TCC) and AEP  
15 Texas North Company (TNC) were merged into their parent company, now called  
16 AEP Texas. The merger was approved by the Commission in Docket No. 46050 –  
17 *Application of AEP Texas Central Company, AEP Texas North Company, and AEP*  
18 *Utilities, Inc. for Approval of Merger.* The Public Utility Commission (“PUC” or  
19 “Commission”) ordered AEP Texas to “maintain separate TCC and TNC divisions,  
20 which will continue to charge separate rates and riders, and maintain separate tariffs,  
21 unless and until such time as the Commission may consider and approve consolidated

1 rates and tariffs.”<sup>1</sup> Consistent with the Commission’s order, AEP Texas is  
2 maintaining two divisions within AEP Texas: AEP Texas – Central Division  
3 (formerly TCC) and AEP Texas – North Division (formerly TNC). Therefore, this  
4 filing only affects the Central Division of AEP Texas.

5 Q. WHAT RELIEF IS THE COMPANY REQUESTING IN THIS FILING?

6 A. The Company is requesting approval of Rider TC-2 effective with the first billing  
7 cycle for September 2019 (August 28, 2019) which incorporates TC-2 rates  
8 calculated utilizing the Non-standard True-up adjustment.

9  
10 III. BACKGROUND

11 Q. PLEASE PROVIDE A BRIEF DESCRIPTION OF THE HISTORY OF THE TC-2  
12 RATES.

13 A. On March 3, 2006, TCC (formerly known as Central Power and Light Company)  
14 initially filed its application for a Financing Order under Subchapter G of Chapter 39  
15 of the Public Utility Regulatory Act (PURA) to permit securitization of some of its  
16 stranded costs, regulatory assets and other qualified costs as described in its  
17 application. That proceeding was assigned Docket No. 32475. On June 21, 2006, the  
18 Commission issued a Final Order (Financing Order) that authorized the issuance of  
19 Transition Bonds for TCC for the recovery of stranded costs, regulatory assets,  
20 carrying costs, and up-front qualified costs associated with such bonds and approved  
21 the collection of the costs through Schedule TC-2 and Rider TC-2. In accordance

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<sup>1</sup> Docket No. 46050, *Application of AEP Texas Central Company, AEP Texas North Company, and AEP Utilities, Inc. for Approval of Merger*, Final Order at Ordering Paragraph No. 2 (Dec. 12, 2016).

1 with the Financing Order, AEP Texas Central Transition Funding II LLC, 2006-1  
2 (Bond Company) securitized the stranded costs, regulatory assets and other qualified  
3 costs on October 11, 2006 by issuing transition bonds (Transition Bonds) and TCC  
4 began billing TC-2s on October 12, 2006. AEP Texas is the Servicer for the Bond  
5 Company with respect to the Transition Bonds and in that role it bills, collects,  
6 receives and adjusts the transition charges imposed pursuant to AEP Texas – Central  
7 Division’s Tariff for Retail Delivery Service, Section 6.1.1.2.2.1 – Initial/Adjusted  
8 Transition Charge-2 Rates - Rider TC-2, and remits the amounts received to the  
9 trustee to repay the Transition Bonds. The Financing Order, Schedule TC-2 and  
10 Rider TC-2 set out the rates and terms and conditions under which the transition  
11 charges will be billed and collected with respect to the Transition Bonds.

12 This filing is being made to comply with the procedures in the Financing  
13 Order for making a Non-standard True-up which, among other things, require this  
14 filing be made 90 days in advance of the proposed effective date of the Non-standard  
15 True-up. This filing is being made 90 days prior to the first billing cycle for  
16 September 2019 so that the TC-2 rates will reflect the Non-standard True-up  
17 provision of the Financing Order.

#### 18 IV. NON-STANDARD TRUE-UP

19  
20 Q. WHAT IS THE NON-STANDARD TRUE-UP ADJUSTMENT?

21 A. FOF 95 of the Financing Order states that a Non-standard True-up adjustment will be  
22 applied if the forecasted billing units for one or more of the transition charge  
23 customer classes for an upcoming period decrease by more than 10% compared to the

1 billing units for the 12 months ending August 31, 2005 as shown in Appendix E of  
2 the Financing Order in Docket No. 32475. FOFs 96 and 97 set forth a Non-standard  
3 True-up adjustment procedure for adjusting the transition charges to each customer  
4 class and the process to be followed for a Non-standard True-up filing.

5 Q. WHY IS THE NON-STANDARD TRUE-UP ADJUSTMENT NEEDED AT THIS  
6 TIME?

7 A. The billing determinants for the period of September 2019 through August 2020 for  
8 the Commercial and Small Industrial Energy (Commercial Energy) class and the  
9 Municipal and Cotton Gin class is forecasted to decrease by more than 10% as  
10 compared to the billing determinants for the twelve months ending August 31, 2005,  
11 as shown in Appendix E to the Financing Order. Therefore, in accordance with FOF  
12 95 of the Financing Order, the TC-2 rates proposed to be effective beginning August  
13 28, 2019 are to be adjusted pursuant to the Non-Standard True-Up provisions of the  
14 Financing Order.

15 The Commercial Energy TC-2 class is demonstrating lower than forecasted  
16 kWh usage compared to 2005 levels. There are three possible contributing factors  
17 influencing this lower usage. The first factor is that a large portion of the customers  
18 in this class were existing customers prior to unbundling who were receiving service  
19 under energy-only tariff schedules. These customers migrated to this TC-2 class and  
20 were frozen from moving out of the class; however, these are typically older accounts  
21 and many have either terminated service completely, have been demolished and have  
22 been replaced by new more modern loads, or have simply just reduced their  
23 consumption. The second factor is that the remaining customers comprising this class

1 are new customers taking service under the current Secondary Voltage Service  $\leq 10$   
2 kW. As the open Texas market has evolved, customers taking service under this tariff  
3 schedule may not demonstrate as high a kWh consumption pattern as the old accounts  
4 that have terminated. A final and significant factor is that the Commission's new  
5 pro-forma tariff schedules define the limit at 10 kW for new customers in the  
6 determination if the customers should be billed on an energy-only based tariff  
7 schedule or a demand- based tariff schedule. Prior to deregulation, it was the  
8 customer's usage characteristics rather than demand that determined the type of tariff  
9 schedule that was most appropriate for the customer. Now, under the new pro-forma  
10 tariffs, new customers tend to qualify for service on the Secondary Voltage Service  $>$   
11 10 kW distribution rate class. New Secondary Voltage Service  $> 10$  kW distribution  
12 rate class customers are assigned the Commercial and Small Industrial Demand  
13 (Commercial Demand) TC-2 rate, which uses the customer's demands for billing  
14 purposes. No new Secondary Voltage Service  $> 10$  kW distribution rate class  
15 customers are allowed to be billed on the Commercial Energy TC-2 class charges. In  
16 addition, the forecasted kWh for the Municipal and Cotton Gin class is slightly lower  
17 than the threshold billing units.

18 Q. HOW IS THE NON-STANDARD TRUE-UP ADJUSTMENT CALCULATED?

19 A. As prescribed in FOF 96 in the Financing Order and Schedule TC-2, the Non-  
20 standard True-up shall be conducted in the following manner:

- 21 (a). allocate the upcoming period's PBR based on the PBRAFs approved in the  
22 Financing Order;
- 23 (b). calculate under-collections or over-collections, including without limitation  
24 any caused by REP defaults, from the preceding period in each class by

1 subtracting the previous period's transition charge revenues collected from  
2 each class from the PBR determined for that class for the same period;

3 (c). sum the amounts allocated to each customer class in steps (a) and (b) to  
4 determine an adjusted PBR for each transition charge customer class;

5 (d). divide the PBR for each customer class by the maximum of the forecasted  
6 billing units or the threshold billing units for that class, to determine the  
7 "threshold rate";

8 (e). multiply the threshold rate by the forecasted billing units for each class to  
9 determine the expected collections under the threshold rate;

10 (f). allocate the difference in the adjusted PBR and the expected collections  
11 calculated in step (e) among the transition charge customer classes using the  
12 PBRAFs approved in this Financing Order;

13 (g). add the amount allocated to each class in step (f) above to the expected  
14 collection amount by class calculated in step (e) above to determine the final  
15 PBR for each class; and

16 (h). divide the final PBR for each class by the forecasted billing units to determine  
17 the transition charge rate by class for the upcoming period.

18 The calculation of the TC-2 rates, detailed in EXHIBIT SGJ-1 to this  
19 testimony, complies with these provisions of the Financing Order and Schedule TC-2  
20 detailed above.

21 Q. EXPLAIN THE PERIODIC BILLING REQUIREMENT (PBR) USED IN THE  
22 CURRENT FILING.

23 A. The PBR for the period September 2019 through August 2020 is \$214,065,213. This  
24 amount corresponds to the actual interest rates and other factors known at issuance in  
25 October 2006. The PBR increases each year by approximately \$4 million for the life  
26 of the securitization as was determined in PUCT Docket No. 32475. Each class's  
27 over/under collections are included in the calculation as well as items such as interest  
28 earned on collections and a charge-off true-up. The charge-off true-up has been  
29 revised based on the REP's recent charge-off experience and is included in this filing.  
30 Summing the true-up amount for each class produces an overall over-recovery of

1       \$3,749,988, which has been incorporated into the current filing to arrive at an  
2       adjusted PBR of \$210,315,225.

3   Q.   EXPLAIN THE PROJECTED BILLING UNITS USED IN THE CURRENT  
4       FILING.

5   A.   AEP Economic Forecasting and Analysis forecasts kWh and kW by TC-2 class based  
6       on historic billing units for each TC-2 class through December 2018. Historic kWh  
7       and kW for each TC-2 class are used to arrive at projected billing units for September  
8       2019 through August 2020. Projected kWh billing units are used for the Residential,  
9       Municipal and Cotton Gin, and Commercial Energy TC-2 classes. Projected KW  
10      billing units are used for the Commercial Demand, Large Industrial Firm and Non-  
11      Firm, and Standby Firm and Non-Firm TC-2 classes.

12   Q.   WILL THIS BE THE LAST RIDER TC-2 NON-STANDARD TRUE-UP?

13   A.   Yes. The final bond payment according to the amortization schedule will be on July  
14      1, 2020. The Company proposes to stop billing Rider TC-2 rates after the last billing  
15      cycle of the June 2020 billing month or sooner if the Company determines that TC-2  
16      collections are sufficient to pay the last bond payment in full on July 1, 2020,  
17      including estimates of any other remaining costs. However, it may be necessary for  
18      the Company to make an Interim True-up filing if it determines that TC-2 collections  
19      are insufficient to make either of the last two bond payments on January 1, 2020 or  
20      July 1, 2020. The Company will determine the final reconciliation amount including  
21      any refund balance due to customers (REPs) after July 1, 2020.

V. REVISED TARIFF

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Q. HAVE YOU PROVIDED A REVISED TARIFF REFLECTING THE  
NON-STANDARD TRUE-UP CALCULATION OF TC-2s?

A. Yes. EXHIBIT SGJ-2 contains the Transition Charge Rates – Rider TC-2 calculated  
using the non-standard adjustment, which has been marked showing the changes from  
the current tariff.

Q. WHAT CHANGES ARE PROPOSED FOR RIDER TC-2?

A. The rates are changed as indicated with margin notations on EXHIBIT SGJ-2, page 1  
of 2. An effective date of August 28, 2019 has been added to the header of each  
page.

Q. HOW DO THE PROPOSED TC-2 RATES COMPARE TO THE CURRENT  
RATES?

A. Please see EXHIBIT SGJ-3 for rate comparisons. Proposed TC-2 rates for most TC-2  
classes are higher compared to current TC-2 rates, except the rates for the Large  
Industrial Firm and Commercial Demand TC classes which are lower.

VI. CONCLUSION

Q. WHAT RELIEF IS THE COMPANY REQUESTING IN THIS PROCEEDING?

A. The Company is requesting that the proposed Rider TC-2 be approved effective with  
the first billing cycle of September 2019 (August 28, 2019). Also, the Company  
proposes to stop billing Rider TC-2 rates prior to July 2020 after it determines that  
TC-2 collections are sufficient to pay the last bond payment on July 1, 2020.



1 Q. DOES THIS CONCLUDE YOUR DIRECT TESTIMONY?

2 A. Yes, it does.

**AEP TEXAS - CENTRAL DIVISION**  
**CALCULATION OF TC-2 Rates**  
Non-Standard True-Up Adjustment  
For the Billing Period of September 2019 through August 2020

	a	b	c	d	e	f	g	h	i	j	k	l	m
TC-2 Class	PBRAAF Allocator*	Periodic Billing Requirement (PBR)**	Prior Period (Over)/Under Recovery	Adjusted PBR	9/2019 - 8/2020 Projected Billing Units	Threshold Units - 90% of Billing Units in Docket 32475 Financing Order Appendix E	Greater of Threshold or Year-end 8/2020 Billing Units	Threshold Rate (col d / g)	Expected Collections with Threshold Rate (col e x h)	Difference (col d - i)	Allocation per PBRAAFs	Final Periodic Billing Requirement (col i + k)	Adjusted Transition Charge Rate*** (col l / e)
Residential	38.8932%	\$ 83,256,811	\$912,021	\$ 84,168,833	10,087,990,391	7,586,920,670	10,087,990,391	\$ 0.008343 per kWh	\$ 84,168,833	\$ -	\$ 4,770,632	\$ 88,939,464	\$ 0.008816
Commercial Energy	22.4467%	48,050,576	(784,988)	47,265,588	1,963,854,692	2,641,657,543	2,641,657,543	\$ 0.017892 per kWh	35,138,070	12,127,518	2,753,307	37,891,377	\$ 0.019294
Muni & Cotton Gin Energy	2.6976%	5,774,623	138,449	5,913,072	438,253,777	448,761,975	448,761,975	\$ 0.013176 per kWh	5,774,612	138,460	330,887	6,105,499	\$ 0.013931
Commercial Demand	28.9875%	62,052,154	(2,950,002)	59,102,152	27,480,283	14,921,088	27,480,283	\$ 2.150711 per kW	59,102,152	-	3,555,601	62,657,752	\$ 2.280098
Large Industrial Firm	2.3222%	4,971,022	(909,928)	4,061,095	4,609,700	2,578,829	4,609,700	\$ 0.880989 per kW	4,061,095	-	284,841	4,345,935	\$ 0.942781
Standby Firm	1.4882%	3,185,718	21,521	3,207,239	15,496,136	12,894,011	15,496,136	\$ 0.206970 per kW	3,207,239	-	182,542	3,389,782	\$ 0.218750
Large Industrial Non-Firm	2.7973%	5,988,046	(183,831)	5,804,215	2,722,283	2,396,023	2,722,283	\$ 2.132113 per kW	5,804,215	-	343,116	6,147,331	\$ 2.258153
Standby Non-Firm	0.3673%	786,262	6,770	793,032	2,576,547	2,209,396	2,576,547	\$ 0.307789 per kW	793,032	-	45,053	838,085	\$ 0.325274
<b>Total</b>	<b>100.0000%</b>	<b>\$ 214,065,213</b>	<b>(\$3,749,988)</b>	<b>\$ 210,315,225</b>					<b>\$ 198,049,246</b>	<b>\$ 12,265,979</b>	<b>\$ 12,265,979</b>	<b>\$ 210,315,225</b>	

\*PBRAAF allocator was revised effective November 2008 pursuant to the Final Order in PUCT Docket No. 32795/35105

\*\*The PBR depends on actual interest rates or other factors known at issuance. PBR based on model projected billings.

\*\*\*Residential, Commercial Energy, Muni & Cotton Gin, and Commercial Demand TC-2 rates apply to actual billing units. Large Industrial Firm (except additional metered load),

Large Industrial Non-Firm, Standby Firm and Standby Non-Firm TC rates apply to average historic demands adjusted for growth and weather.

**AEP TEXAS - CENTRAL DIVISION****TARIFF FOR ELECTRIC DELIVERY SERVICE**

Applicable: Certified Service Area previously served by AEP Texas Central Company Page 1 of 2

Chapter: 6 Section: 6.1.1

Section Title: Delivery System Charges

Revision: Nineteenth

Effective Date: August 28, 2019 |T

**6.1.1.2.2.1 Initial / Adjusted Transition Charge-2 Rates – Rider TC-2****AVAILABILITY**

This schedule is applicable to energy consumption and demands of retail customers taking service from the Company during the term that this schedule is in effect, and to the facilities, premises, and loads of all other retail customers obligated to pay TC-2 Charges as provided in Rate Schedule TC-2, Section 6.1.1.2.2.1. Terms defined in Rate Schedule TC-2 that are used herein shall have the same meaning as set forth in Rate Schedule TC-2.

**RATE CLASSES**

For purposes of billing Initial/Adjusted Transition Charge-2 Rates (TC-2 Rates), each retail end-use customer will be designated as a customer belonging to one of eight classes as identified and defined by Rate Schedule TC-2.

**TRANSITION CHARGE-2 RATES**

The Initial/Adjusted TC-2 Rates shall be determined in accordance with and are subject to the provisions set forth in Rate Schedule TC-2. Not less than 15 days prior to the first billing cycle for the Company's September billing month and no less frequently than annually thereafter, the Company or successor Servicer will file a Revision to Rider TC-2 setting forth the Adjusted TC-2 Rates to be effective for the upcoming period. If made as a result of the annual true-up adjustment in Rate Schedule TC-2, the Adjusted TC-2 Rates will become effective on the first billing cycle of the Company's September billing month. If an interim true up adjustment is made pursuant to Rate Schedule TC-2, the Adjusted TC-2 Rates will become effective on the first billing cycle of the Company's billing month that is not less than 15 days following the making of the interim true-up adjustment filing. If a Non-Standard True-Up filing pursuant to Rate Schedule TC-2 is made to revise the Rider TC-2, the filing will be made at least 90 days prior to the first billing cycle for the Company's September billing month.

**AEP TEXAS - CENTRAL DIVISION****TARIFF FOR ELECTRIC DELIVERY SERVICE**

Applicable: Certified Service Area previously served by AEP Texas Central Company Page 2 of 2

Chapter: 6 Section: 6.1.1

Section Title: Delivery System Charges

Revision: Nineteenth

Effective Date: August 28, 2019 |T

**6.1.1.2.2.1 Initial / Adjusted Transition Charge-2 Rates – Rider TC-2**

<b><u>Transition Charge-2 Customer Class</u></b>	<b><u>Initial/Adjusted TC-2 Rates</u></b>	
Residential	\$ .008816 per kWh	I
Commercial and Small Industrial – Energy	\$ .019294 per kWh	I
Commercial and Small Industrial – Demand	\$ 2.280098 per kW or kVa	R
Large Industrial – Firm	\$ .942781 per kW or kVa	R
Large Industrial – Non-Firm	\$ 2.258153 per kW or kVa	I
Standby – Firm	\$ .218750 per Daily kW or kVa	I
Standby – Non-Firm	\$ .325274 per Daily kW or kVa	I
Municipal and Cotton Gin	\$ .013931 per kWh	I

The Initial/Adjusted TC-2 Rates are multiplied by the kWh, kW or kVa, as applicable, read, estimated or determined during the billing month and will be applied to bills rendered on and after the effective date.

## TC-2 RATE COMPARISON

TC-2 Rate Class	TC-2 Rate effective 9/2018-8/2019	Revised TC-2 Rate effective 9/2019
Residential	\$ 0.008348 per kWh	\$ 0.008816 per kWh
Commercial Energy	\$ 0.017772 per kWh	\$ 0.019294 per kWh
Muni & Cotton Gin Energy	\$ 0.012395 per kWh	\$ 0.013931 per kWh
Commercial Demand	\$ 2.378529 per kW	\$ 2.280098 per kW
Large Industrial Firm	\$ 0.965243 per kW	\$ 0.942781 per kW
Standby Firm	\$ 0.170843 per kW	\$ 0.218750 per kW
Large Industrial Non-Firm	\$ 2.204315 per kW	\$ 2.258153 per kW
Standby Non-Firm	\$ 0.213209 per kW	\$ 0.325274 per kW

Docket No. 32475

Financing Order

Page 55 of 88

**12. Interim True-Up**

93. In addition to these annual true-up adjustments, true-up adjustments may be made by the servicer more frequently at any time during the term of the transition bonds to correct any undercollection or overcollection, as provided for in this Financing Order, in order to assure timely payment of transition bonds based on rating agency and bondholder considerations. In addition to the foregoing, either of the following two conditions may result in an interim true-up adjustment prior to an upcoming transition bond principal payment date:

- (a) the servicer determines that collection of transition charges for the upcoming payment date would result in a difference that is greater than 5% in absolute value, between (i) the actual outstanding principal balances of the transition bonds plus amounts on deposit in the excess funds subaccount and (ii) the outstanding principal balances anticipated in the target amortization schedule; or
- (b) to meet a rating agency requirement that any tranche of transition bonds be paid in full by its expected maturity date.

94. In the event an interim true-up is necessary, the interim true-up adjustment should be filed not less than 15 days prior to the first billing cycle of the month in which the revised transition charges will be in effect. In no event would such interim true-up adjustments occur more frequently than every three months if quarterly transition bond payments are required or every six months if semi-annual transition bond payments are required; provided, however, that interim true-up adjustments for any transition bonds remaining outstanding during the fourteenth and fifteenth year after the bonds are issued may occur quarterly.

**13. Non-Standard True-Up**

95. A non-standard true-up procedure will be applied if the forecasted billing units for one or more of the transition charge customer classes for an upcoming period decreases by more than 10% compared to the billing units used by TCC to

TCC 57

Docket No. 32475

Financing Order

Page 56 of 88

develop the PBRAFs approved in this Financing Order (known as the threshold billing units), shown in Appendix E to this Financing Order.

96. In conducting the non-standard true-up the servicer will:
- (a) allocate the upcoming period's PBR based on the PBRAFs approved in this Financing Order;
  - (b) calculate undercollections or overcollections, including without limitation any caused by REP defaults, from the preceding period in each class by subtracting the previous period's transition charge revenues collected from each class from the PBR determined for that class for the same period;
  - (c) sum the amounts allocated to each customer class in steps (a) and (b) to determine an adjusted PBR for each transition charge customer class;
  - (d) divide the PBR for each customer class by the maximum of the forecasted billing units or the threshold billing units for that class, to determine the "threshold rate";
  - (e) multiply the threshold rate by the forecasted billing units for each class to determine the expected collections under the threshold rate;
  - (f) allocate the difference in the adjusted PBR and the expected collections calculated in step (e) among the transition charge customer classes using the PBRAFs approved in this Financing Order;
  - (g) add the amount allocated to each class in step (f) above to the expected collection amount by class calculated in step (e) above to determine the final Periodic Billing Requirement for each class; and
  - (h) divide the final PBR for each class by the forecasted billing units to determine the transition charge rate by class for the upcoming period.
97. A proceeding for the purpose of approving a non-standard true-up should be conducted in the following manner:
- (a) The servicer will make a "non-standard true-up filing" with the Commission at least 90 days before the date of the proposed true-up adjustment. The filing will contain the proposed changes to the transition charge rates, justification for such changes as necessary to

700058

Docket No. 32475

Financing Order

Page 57 of 88

specifically address the cause(s) of the proposed non-standard true-up, and a statement of the proposed effective date.

- (b) Concurrently with the filing of the non-standard true-up with the Commission, the servicer will notify all parties in this docket of the filing of the proposal for a non-standard true-up.
- (c) The servicer will issue appropriate notice and the Commission will conduct a contested case proceeding on the non-standard true-up proposal pursuant to PURA § 39.003.

The scope of the proceeding will be limited to determining whether the proposed adjustment complies with this Financing Order. The Commission will issue a final order by the proposed true-up adjustment date stated in the non-standard true-up filing. In the event that the Commission cannot issue an order by that date, the servicer will be permitted to implement its proposed changes. Any modifications subsequently ordered by the Commission will be made by the servicer in the next true-up filing.

#### **14. Additional True-Up Provisions**

- 98. The true-up adjustment filing will set forth the servicer's calculation of the true-up adjustment to the transition charges. Except for the non-standard true-up in Findings of Fact Nos. 95 through 97, the Commission will have 15 days after the date of a true-up adjustment filing in which to confirm the mathematical accuracy of the servicer's adjustment. Except for the non-standard true-up adjustment described above, any true-up adjustment filed with the Commission should be effective on its proposed effective date, which shall be not less than 15 days after filing. Any necessary corrections to the true-up adjustment, due to mathematical errors in the calculation of such adjustment or otherwise, will be made in future true-up adjustment filings.
- 99. The true-up procedures contained in Schedule TC-2 are reasonable and will reduce risks related to the transition bonds, resulting in lower transition bond charges and greater benefits to ratepayers and should be approved.

000059



Docket No. 32475

Financing Order

Page 75 of 88

8. **Collector of Transition Charges.** TCC or any subsequent servicer of the transition bonds shall bill a consumer's REP or other entity which, under the terms of this Financing Order or the tariffs approved hereby, is required to bill, or collect transition charges, for the transition charges attributable to that consumer.
9. **Collection Period.** The transition charges related to a series of transition bonds shall be designed to be collected over the expected 14-year life of the transition bonds. However, to the extent that any amounts are not recovered at the end of this 14-year period, TCC may continue to recover them over a period ending not more than 15 years from the date of issuance of that series of transition bonds. Amounts remaining unpaid after this 15-year period may be recovered but only to the extent that the charges are attributable to services rendered during the 15-year period.
10. **Allocation.** TCC shall allocate the transition charges among consumer classes in the manner described in this Financing Order.
11. **Nonbypassability.** TCC and any other entity providing electric transmission or distribution services and any REP providing services to any retail consumer within TCC's certificated service area as it existed on May 1, 1999 (except as provided in Finding of Fact No. 80), are entitled to collect and must remit, consistent with this Financing Order, the transition charges from such retail consumers and, except as provided under PURA §§ 39.252(b) and 39.262(k), as implemented by P.U.C. SUBST. R. 25.345, from retail consumers that switch to new on-site generation, and such retail consumers are required to pay such transition charges. The Commission will ensure that such obligations are undertaken and performed by TCC, any other entity providing electric transmission or distribution services within TCC's certificated service area as of May 1, 1999 and any REP providing services to any retail consumer within such certificated service area.
12. **True-Ups.** True-ups of the transition charges, including non-standard true-ups, shall be undertaken and conducted as described in Schedule TC-2. The servicer

000077

Docket No. 32475

Financing Order

Page 76 of 88

shall file the true-up adjustments in a compliance docket and shall give notice of the filing to all parties in this docket.

13. **Ownership Notification.** Any entity that bills transition charges to retail consumers shall, at least annually, provide written notification to each retail consumer for which the entity bills transition charges that the transition charges are the property of BondCo and not of the entity issuing such bill.

### C. Transition Bonds

14. **Issuance.** BondCo is authorized to issue transition bonds as specified in this Financing Order. The ongoing qualified costs described in Appendix D may be recovered directly through the transition charges.
15. TCC may securitize up-front qualified costs in accordance with this Financing Order, subject to the cap on certain of TCC's securitizable up-front qualified costs as shown on Appendix D to this Financing Order. In the issuance advice letter, TCC will update the SEC registration fee and underwriter's fee if these amounts deviate from those listed in Appendix C as a result of a change in the size of the transition bond issuance or a change in the SEC's formula for calculating the registration fee. The cap on up-front qualified costs does not apply to costs associated with original issue discount or other credit enhancements as discussed in Ordering Paragraph No. 21, or to the costs of refinancing or retiring debt. These costs are not capped by this Financing Order.
16. TCC may recover its actual ongoing qualified costs through its transition charges, subject to the caps on the servicing fee as set forth in Appendix D to this Financing Order. The amount of ongoing qualified costs is subject to updating in the issuance advice letter to reflect a change in the size of the transition bond issuance and other information available at the time of submission of the issuance advice letter. Costs associated with original issue discount or other credit enhancements as discussed in Ordering Paragraph No. 21 are not capped by this Financing Order. As provided in Ordering Paragraph No. 28, a servicer, other than TCC, may collect a higher servicing fee than that set forth in Appendix D to

COC078

NOTICE OF NON-STANDARD TRUE-UP FILING  
BY AEP TEXAS INC.

AEP Texas Inc. (“AEP Texas” or “Company”) hereby publishes NOTICE that it filed with the Public Utility Commission of Texas (the “Commission”) on May \_\_, 2019, the NON-STANDARD TRUE-UP FILING OF AEP TEXAS INC. PURSUANT TO THE FINANCING ORDER IN DOCKET NO. 32475. The filing seeks approval of transition charge rates to be calculated and applied beginning with the first billing cycle for the month of September 2019, pursuant to the Non-standard True-up provisions of the order issued by the Commission on June 21, 2006, in Docket No. 32475, *Application of AEP Texas Central Company for A Financing Order* (the “Financing Order”) and Sections 39.003 and 39.307 of the Texas Utilities Code. Customers potentially affected include those retail customers, whether or not currently receiving transmission and/or distribution service from AEP Texas – Central Division (formerly AEP Texas Central Company), whose facilities, premises and loads are located in AEP Texas’s certificated service area (formerly TCC’s certificated service area) and are being served or have been served by AEP Texas (formerly TCC) at any time on or after May 1, 1999. This filing only affects the AEP Texas – Central Division. The filing has been assigned Docket No. \_\_\_\_\_.

On October 11, 2006, Transition Bonds were issued under the Financing Order. The Financing Order establishes how the annual costs permitted to be recovered through transition charges are allocated among customer classes. The Non-standard True-up provisions of the Financing Order permit adjustment of the transition charges for each customer class if the forecasted billing determinants for any one or more customer classes are projected to decrease by more than 10 percent from the billing determinants for the 12 months ending August 31, 2005 (“base period”). The billing determinants for the Commercial and Small Industrial-Energy class are forecasted to decrease by more than 10 percent for the 12 months ending August 2019 when compared to the base period.

If the Non-standard True-up is approved, transition charge rates applicable to all retail customer classes will be affected. The proposed rates for the transition charge classes are as follows:

<b><u>Transition Charge Class</u></b>	<b><u>Transition Charge Rates</u></b>
Residential	\$ .008816 per kWh
Commercial and Small Industrial – Energy	\$ .019294 per kWh
Commercial and Small Industrial – Demand	\$ 2.280098 per kW or kVa
Large Industrial – Firm	\$ .942781 per kW or kVa
Large Industrial – Non-Firm	\$ 2.258153 per kW or kVa
Standby – Firm	\$ .218750 per Daily kW or kVa
Standby – Non-Firm	\$ .325274 per Daily kW or kVa
Municipal and Cotton Gin	\$ .013931 per kWh

The deadline for filing a motion to intervene in this proceeding is \_\_\_\_\_. Additionally, any person who intervenes and would like a hearing on this matter must file a request for hearing with the Commission by \_\_\_\_\_. The request for a hearing must also include a specific list of issues the person believes should be addressed at the hearing.

The scope of the proceeding will be limited to determining whether the Non-standard True-up complies with the Financing Order. The Financing Order requires the Commission to rule upon the Company's request within 90 days or the requested rates will go into effect. Persons with questions or who want more information on this petition may contact AEP Texas Inc., 539 North Carancahua Street, Corpus Christi, Texas 78401 or call (361)881-5387 or call toll free at (888)216-3523 during normal business hours. A complete copy of this Application is available for inspection at the above address. Persons who wish to formally participate in this proceeding, or who wish to express their comments concerning this Petition should contact the Public Utility Commission of Texas, Office of Customer Protection, P.O. Box 13326, Austin, Texas 78711-3326, or call (512)936-7120 or toll free at (888)782-8477. Hearing and speech-impaired individuals with text telephones (TTY) may call (512)936-7136 or use Relay Texas (toll free) (800)735-2989.

PUC DOCKET NO. \_\_\_\_\_

AEP TEXAS CENTRAL COMPANY	§	BEFORE THE PUBLIC UTILITY
NON-STANDARD TRUE-UP FILING	§	
PURSUANT TO THE FINANCING	§	COMMISSION OF TEXAS
ORDER IN DOCKET NO. 21528	§	

**PROPOSED PROTECTIVE ORDER**

This Protective Order shall govern the use of all information deemed confidential (Protected Materials) or highly confidential (Highly Sensitive Protected Materials) by a party providing information to the Public Utility Commission of Texas (Commission), including information whose confidentiality is currently under dispute.

It is ORDERED that:

1. Designation of Protected Materials. Upon producing or filing a document, including, but not limited to, records stored or encoded on a computer disk or other similar electronic storage medium in this proceeding, the producing party may designate that document, or any portion of it, as confidential pursuant to this Protective Order by typing or stamping on its face "PROTECTED PURSUANT TO PROTECTIVE ORDER ISSUED IN DOCKET NO. \_\_\_\_\_" or words to this effect and consecutively Bates Stamping each page. Protected Materials and Highly Sensitive Protected Materials include not only the documents so designated, but also the substance of the information contained in the documents and any description, report, summary, or statement about the substance of the information contained in the documents.
2. Materials Excluded from Protected Materials Designation. Protected Materials shall not include any information or document contained in the public files of the Commission or any other federal or state agency, court, or local governmental authority subject to the Texas Public Information Act. Protected Materials also shall not include documents or information which at the time of, or prior to disclosure in a proceeding, is or was public knowledge, or which becomes public knowledge other than through disclosure in violation of this Protective Order.

3. Reviewing Party. For the purposes of this Protective Order, a Reviewing Party is a party to this docket.
4. Procedures for Designation of Protected Materials. On or before the date the Protected Materials or Highly Sensitive Protected Materials are provided to the Commission, the producing party shall file with the Commission and deliver to each party to the proceeding a written statement, which may be in the form of an objection, indicating: (1) any and all exemptions to the Public Information Act, TEX. GOV'T CODE ANN., Chapter 552, claimed to be applicable to the alleged Protected Materials; (2) the reasons supporting the providing party's claim that the responsive information is exempt from public disclosure under the Public Information Act and subject to treatment as protected materials; and (3) that counsel for the providing party has reviewed the information sufficiently to state in good faith that the information is exempt from public disclosure under the Public Information Act and merits the Protected Materials designation.
5. Persons Permitted Access to Protected Materials. Except as otherwise provided in this Protective Order, a Reviewing Party shall be permitted access to Protected Materials only through its Reviewing Representatives who have signed the Protective Order Certification Form. Reviewing Representatives of a Reviewing Party include its counsel of record in this proceeding and associated attorneys, paralegals, economists, statisticians, accountants, consultants, or other persons employed or retained by the Reviewing Party and directly engaged in these proceedings. At the request of the Commissioners or their staff, copies of Protected Materials may be produced by the Staff of the Public Utility Commission of Texas (Commission Staff) or the Commission Advising and Docket Management Division (CADM) to the Commissioners. The Commissioners and their staff shall be informed of the existence and coverage of this Protective Order and shall observe the restrictions of the Protective Order.
6. Highly Sensitive Protected Material Described. The term Highly Sensitive Protected Materials is a subset of Protected Materials and refers to documents or information which a producing party claims is of such a highly sensitive nature that making copies of such documents or information or providing access to such documents to employees of the Reviewing Party (except as set forth herein) would expose a producing party to unreasonable risk of harm, including but not limited to: (1) customer-specific information

protected by § 32.101(c) of the Public Utility Regulatory Act; (2) contractual information pertaining to contracts that specify that their terms are confidential or which are confidential pursuant to an order entered in litigation to which the producing party is a party; (3) market-sensitive fuel price forecasts, wholesale transactions information and/or market-sensitive marketing plans; and (4) business operations or financial information that is commercially sensitive. Documents or information so classified by a producing party shall bear the designation "HIGHLY SENSITIVE PROTECTED MATERIALS PROVIDED PURSUANT TO PROTECTIVE ORDER ISSUED IN DOCKET NO. \_\_\_\_\_" or words to this effect and shall be consecutively Bates Stamped in accordance with the provisions of this Protective Order. The provisions of this Protective Order pertaining to Protected Materials also apply to Highly Sensitive Protected Materials, except where this Protective Order provides for additional protections for Highly Sensitive Protected Materials. In particular, the procedures herein for challenging the producing party's designation of information as Protected Materials also apply to information that a producing party designates as Highly Sensitive Protected Materials.

7. Restrictions on Copying and Inspection of Highly Sensitive Protected Material. Except as expressly provided herein, only one copy may be made of any Highly Sensitive Protected Materials except that additional copies may be made in order to have sufficient copies for introduction of the material into the evidentiary record if the material is to be offered for admission into the record. A record of any copies that are made of Highly Sensitive Protected Material shall be kept and a copy of the record shall be sent to the producing party at the time the copy or copies are made. The record shall include information on the location and the person in possession of the copy. Highly Sensitive Protected Material shall be made available for inspection only at the location or locations provided by the producing party, except as provided by Paragraph 9. Limited notes may be made of Highly Sensitive Protected Materials, and such notes shall themselves be treated as Highly Sensitive Protected Materials unless such notes are limited to a description of the document and a general characterization of its subject matter in a manner that does not state any substantive information contained in the document.
8. Restricting Persons Who May Have Access to Highly Sensitive Protected Material. With the exception of the Commission Staff and the Office of Public Utility Counsel (OPC),

and except as provided herein, the Reviewing Representatives for the purpose of access to Highly Sensitive Protected Materials may be persons who are: (1) outside counsel for the Reviewing Party; (2) outside consultants for the Reviewing Party working under the direction of Reviewing Party's counsel; or (3) employees of the Reviewing Party working with and under the direction of Reviewing Party's counsel who have been authorized by the presiding officer to review Highly Sensitive Protected Materials. The Reviewing Party shall limit the number of Reviewing Representatives that review each Highly Sensitive Protected document to the minimum number of persons necessary. The Reviewing Party is under a good faith obligation to limit access to each portion of any Highly Sensitive Protected Materials to two Reviewing Representatives whenever possible. Reviewing Representatives for the Commission Staff and OPC, for the purpose of access to Highly Sensitive Protected Materials, shall consist of their respective counsel of record in this proceeding and associated attorneys, paralegals, economists, statisticians, accountants, consultants, or other persons employed or retained by them and directly engaged in these proceedings.

9. Copies Provided of Highly Sensitive Protected Material. A producing party shall provide one copy of Highly Sensitive Protected Materials specifically requested by the Reviewing Party to the person designated by the Reviewing Party who must be a person authorized to review Highly Sensitive Protected Material under Paragraph 8, and be either outside counsel or an outside consultant. Other representatives of the reviewing party who are authorized to view Highly Sensitive Material may review the copy of Highly Sensitive Protected Materials at the office of the Reviewing Party's representative designated to receive the information. Any Highly Sensitive Protected documents provided to a Reviewing Party may not be copied except as provided in Paragraph 7 and shall be returned along with any copies made pursuant to Paragraph 7 to the producing party within two weeks after the close of the evidence in this proceeding. The restrictions contained herein do not apply to the Commission Staff, OPC, and the Office of the Attorney General (OAG) when the OAG is a representing a party to the proceeding.
10. Procedures in Paragraphs 10-14 Apply to Commission Staff, OPC, and the OAG and Control in the Event of Conflict. The procedures set forth in Paragraphs 10 through 14 apply to responses to requests for documents or information that the producing party



designates as Highly Sensitive Protected Materials and provides to the Commission Staff, OPC, and the OAG in recognition of their purely public functions. To the extent the requirements of Paragraphs 10 through 14 conflict with any requirements contained in other paragraphs of this Protective Order, the requirements of these Paragraphs shall control.

11. Copy of Highly Sensitive Protected Material to be Provided to the Commission Staff, OPC, and the OAG. When, in response to a request for information by a Reviewing Party, the producing party makes available for review documents or information claimed to be Highly Sensitive Protected Materials, the producing party shall also deliver one copy of the Highly Sensitive Protected Materials to the Commission Staff, OPC (if OPC is a party), and the OAG (if the OAG is representing a party) in Austin, Texas. Provided however, that in the event such Highly Sensitive Protected Materials are voluminous, the materials will be made available for review by Commission Staff, OPC (if OPC is a party), and the OAG (if the OAG is representing a party) at the designated office in Austin, Texas. The Commission Staff, OPC (if OPC is a party), and the OAG (if the OAG is representing a party) may request such copies as are necessary of such voluminous material under the copying procedures set forth herein.
12. Delivery of the Copy of Highly Sensitive Protected Material to Staff and Outside Consultants. The Commission Staff, OPC (if OPC is a party), and the OAG (if the OAG is representing a party) may deliver the copy of Highly Sensitive Protected Materials received by them to the appropriate members of their staff for review, provided such staff members first sign the certification provided in Paragraph 15. After obtaining the agreement of the producing party, Commission Staff, OPC, and the OAG (if the OAG is representing a party) may deliver the copy of Highly Sensitive Protected Materials received by it to the agreed, appropriate members of their outside consultants for review, provided such outside consultants first sign the certification attached hereto.
13. Restriction on Copying by Commission Staff, OPC, and the OAG. Except as allowed by Paragraphs 7, Commission Staff, OPC, and the OAG may not make additional copies of the Highly Sensitive Protected Materials furnished to them unless the producing party agrees in writing otherwise, or, upon a showing of good cause, the Presiding Officer directs otherwise. Limited notes may be made by Commission Staff, OPC (if OPC is a

party), and the OAG (if the OAG is representing a party) of Highly Sensitive Protected Materials furnished to them and all such handwritten notes will be treated as Highly Sensitive Protected Materials as are the materials from which the notes are taken.

14. Public Information Requests. In the event of a request for any of the Highly Sensitive Protected Materials under the Public Information Act, an authorized representative of the Commission Staff, OPC, or the OAG may furnish a copy of the requested Highly Sensitive Protected Materials to the Open Records Division at the OAG together with a copy of this Protective Order after notifying the producing party that such documents are being furnished to the OAG. Such notification may be provided simultaneously with the delivery of the Highly Sensitive Protected Materials to the OAG.
15. Required Certification. Each person who inspects the Protected Materials shall, before such inspection, agree in writing to the following certification set forth in the attachment to this Protective Order:

I certify my understanding that the Protected Materials are provided to me pursuant to the terms and restrictions of the Protective Order in this docket, and that I have been given a copy of it and have read the Protective Order and agree to be bound by it. I understand that the contents of the Protected Materials, any notes, memoranda, or any other form of information regarding or derived from the Protected Materials shall not be disclosed to anyone other than in accordance with the Protective Order and unless I am an employee of Commission Staff or OPC shall be used only for the purpose of the proceeding in Docket No. \_\_\_\_\_. I acknowledge that the obligations imposed by this certification are pursuant to such Protective Order. Provided, however, if the information contained in the Protected Materials is obtained from independent public sources, the understanding stated herein shall not apply.

In addition, Reviewing Representatives who are permitted access to Highly Sensitive Protected Material under the terms of this Protective Order shall, before inspection of such material, agree in writing to the following certification set forth in the Attachment to this Protective Order:

I certify that I am eligible to have access to Highly Sensitive Protected Material under the terms of the Protective Order in this docket.

A copy of each signed certification shall be provided by the reviewing party to counsel for the producing party and served upon all parties of record.

16. Disclosures Between Reviewing Representatives and Continuation of Disclosure Restrictions After a Person is no Longer Engaged in the Proceeding. Any Reviewing Representative may disclose Protected Materials, other than Highly Sensitive Protected Materials, to any other person who is a Reviewing Representative provided that, if the person to whom disclosure is to be made has not executed and provided for delivery of a signed certification to the party asserting confidentiality, that certification shall be executed prior to any disclosure. A Reviewing Representative may disclose Highly Sensitive Protected Material to other Reviewing Representatives who are permitted access to such material and have executed the additional certification required for persons who receive access to Highly Sensitive Protected Material. In the event that any Reviewing Representative to whom Protected Materials are disclosed ceases to be engaged in these proceedings, access to Protected Materials by that person shall be terminated and all notes, memoranda, or other information derived from the protected material shall either be destroyed or given to another Reviewing Representative of that party who is authorized pursuant to this Protective Order to receive the protected materials. Any person who has agreed to the foregoing certification shall continue to be bound by the provisions of this Protective Order so long as it is in effect, even if no longer engaged in these proceedings.
17. Producing Party to Provide One Copy of Certain Protected Material and Procedures for Making Additional Copies of Such Materials. Except for Highly Sensitive Protected Materials which shall be provided to the Reviewing Parties pursuant to Paragraph 9, and voluminous Protected Materials, the producing party shall provide a Reviewing Party one copy of the Protected Materials upon receipt of the signed certification described in Paragraph 15. Except for Highly Sensitive Protected Materials, a Reviewing Party may make further copies of Protected Materials for use in this proceeding pursuant to this Protective Order, but a record shall be maintained as to the documents reproduced and the number of copies made, and upon request the Reviewing Party shall provide the party asserting confidentiality with a copy of that record.

18. Procedures Regarding Voluminous Protected Materials. Production of voluminous Protected Materials will be governed by P.U.C. PROC. R. 22.144(h). Voluminous Protected Materials will be made available in the producing party's voluminous room, in Austin, Texas, or at a mutually agreed upon location, Monday through Friday, 9:00 a.m. to 5:00 p.m. (except on state or Federal holidays), and at other mutually convenient times upon reasonable request.
19. Reviewing Period Defined. The Protected Materials may be reviewed only during the Reviewing Period, which shall commence upon entry of this Protective Order and continue until the expiration of the Commission's plenary jurisdiction. The Reviewing Period shall reopen if the Commission regains jurisdiction due to a remand as provided by law. Protected materials that are admitted into the evidentiary record or accompanying the evidentiary record as offers of proof may be reviewed throughout the pendency of this proceeding and any appeals.
20. Procedures for Making Copies of Voluminous Protected Materials. Other than Highly Sensitive Protected Materials, Reviewing Parties may take notes regarding the information contained in voluminous Protected Materials made available for inspection or they may make photographic, mechanical, or electronic copies of the Protected Materials, subject to the conditions hereof; provided, however, that before photographic, mechanical, or electronic copies can be made, the Reviewing Party seeking photographic, mechanical, or electronic copies must complete a written receipt for copies on the attached form identifying each piece of Protected Materials or portions thereof the Reviewing Party will need.
21. Protected Materials to be Used Solely for the Purposes of These Proceedings. All Protected Materials shall be made available to the Reviewing Parties and their Reviewing Representatives solely for the purposes of these proceedings. Access to the Protected Materials may not be used in the furtherance of any other purpose, including, without limitation: (1) any other pending or potential proceeding involving any claim, complaint, or other grievance of whatever nature, except appellate review proceedings that may arise from or be subject to these proceedings; or (2) any business or competitive endeavor of whatever nature. Because of their statutory regulatory obligations, these restrictions do not apply to the Commission Staff or OPC.

22. Procedures for Confidential Treatment of Protected Materials and Information Derived from those Materials. Protected Materials, as well as a Reviewing Party's notes, memoranda, or other information regarding or derived from the Protected Materials are to be treated confidentially by the Reviewing Party and shall not be disclosed or used by the Reviewing Party except as permitted and provided in this Protective Order. Information derived from or describing the Protected Materials shall be maintained in a secure place and shall not be placed in the public or general files of the Reviewing Party except in accordance with the provisions of this Protective Order. A Reviewing Party must take all reasonable precautions to ensure that the Protected Materials including notes and analyses made from Protected Materials that disclose Protected Materials are not viewed or taken by any person other than a Reviewing Representative of a Reviewing Party.
23. Procedures for Submission of Protected Materials. If a Reviewing Party tenders for filing any Protected Materials, including Highly Sensitive Protected Materials, or any written testimony, exhibit, brief, motion, or other type of pleading or other submission at the Commission or before any other judicial body that quotes from Protected Materials or discloses the content of Protected Materials, the confidential portion of such submission shall be filed and served in sealed envelopes or other appropriate containers endorsed to the effect that they contain Protected Material or Highly Sensitive Protected Material and are sealed pursuant to this Protective Order. If filed at the Commission, such documents shall be marked "PROTECTED MATERIAL" and shall be filed under seal with the Presiding Officer and served under seal to the counsel of record for the Reviewing Parties. The Presiding Officer may subsequently, on his/her own motion or on motion of a party, issue a ruling respecting whether or not the inclusion, incorporation or reference to Protected Materials is such that such submission should remain under seal. If filing before a judicial body, the filing party: (1) shall notify the party which provided the information within sufficient time so that the providing party may seek a temporary sealing order; and (2) shall otherwise follow the procedures set forth in Rule 76a, Texas Rules of Civil Procedure.
24. Maintenance of Protected Status of Materials During Pendency of Appeal of Order Holding Materials are not Protected Materials. In the event that the Presiding Officer at any time in the course of this proceeding finds that all or part of the Protected Materials

are not confidential or proprietary, by finding, for example, that such materials have entered the public domain or materials claimed to be Highly Sensitive Protected Materials are only Protected Materials, those materials shall nevertheless be subject to the protection afforded by this Protective Order for three (3) full working days, unless otherwise ordered, from the date the party asserting confidentiality receives notice of the Presiding Officer's order. Such notification will be by written communication. This provision establishes a deadline for appeal of a Presiding Officer's order to the Commission. In the event an appeal to the Commissioners is filed within those three (3) working days from notice, the Protected Materials shall be afforded the confidential treatment and status provided in this Protective Order during the pendency of such appeal. Neither the party asserting confidentiality nor any Reviewing Party waives its right to seek additional administrative or judicial remedies after the Commission's denial of any appeal.

25. Notice of Intent to Use Protected Materials or Change Materials Designation. Parties intending to use Protected Materials shall notify the other parties prior to offering them into evidence or otherwise disclosing such information into the record of the proceeding. During the pendency of Docket No. \_\_\_\_\_ at the Commission, in the event that a Reviewing Party wishes to disclose Protected Materials to any person to whom disclosure is not authorized by this Protective Order, or wishes to have changed the designation of certain information or material as Protected Materials by alleging, for example, that such information or material has entered the public domain, such Reviewing Party shall first file and serve on all parties written notice of such proposed disclosure or request for change in designation, identifying with particularity each of such Protected Materials. A Reviewing Party shall at any time be able to file a written motion to challenge the designation of information as Protected Materials.
26. Procedures to Contest Disclosure or Change in Designation. In the event that the party asserting confidentiality wishes to contest a proposed disclosure or request for change in designation, the party asserting confidentiality shall file with the appropriate Presiding Officer its objection to a proposal, with supporting affidavits, if any, within five (5) working days after receiving such notice of proposed disclosure or change in designation. Failure of the party asserting confidentiality to file such an objection within this period

shall be deemed a waiver of objection to the proposed disclosure or request for change in designation. Within five (5) working days after the party asserting confidentiality files its objection and supporting materials, the party challenging confidentiality may respond. Any such response shall include a statement by counsel for the party challenging such confidentiality that he or she has reviewed all portions of the materials in dispute and without disclosing the Protected Materials, a statement as to why the Protected Materials should not be held to be confidential under current legal standards, or alternatively that the party asserting confidentiality for some reason did not allow such counsel to review such materials. If either party wishes to submit the material in question for *in camera* inspection, it shall do so no later than five (5) working days after the party challenging confidentiality has made its written filing.

27. Procedures for Presiding Officer Determination Regarding Proposed Disclosure or Change in Designation. If the party asserting confidentiality files an objection, the appropriate Presiding Officer will determine whether the proposed disclosure or change in designation is appropriate. Upon the request of either the producing or reviewing party or upon the presiding officer's own initiative, the presiding officer may conduct a prehearing conference. The burden is on the party asserting confidentiality to show that such proposed disclosure or change in designation should not be made. If the Presiding Officer determines that such proposed disclosure or change in designation should be made, disclosure shall not take place earlier than three (3) full working days after such determination unless otherwise ordered. No party waives any right to seek additional administrative or judicial remedies concerning such Presiding Officer's ruling.
28. Maintenance of Protected Status During Periods Specified for Challenging Various Orders. Any party electing to challenge, in the courts of this state, a Commission or Presiding Officer determination allowing disclosure or a change in designation shall have a period of ten (10) days from: (1) the date of an unfavorable Commission order; or (2) if the Commission does not rule on an appeal of an interim order, the date an appeal of an interim order to the Commission is overruled by operation of law, to obtain a favorable ruling in state district court. Any party challenging a state district court determination allowing disclosure or a change in designation shall have an additional period of ten (10) days from the date of the order to obtain a favorable ruling from a state appeals court.

Finally, any party challenging a determination of a state appeals court allowing disclosure or a change in designation shall have an additional period of ten (10) days from the date of the order to obtain a favorable ruling from the state supreme court, or other appellate court. All Protected Materials shall be afforded the confidential treatment and status provided for in this Protective Order during the periods for challenging the various orders referenced in this Paragraph. For purposes of this Paragraph, a favorable ruling of a state district court, state appeals court, supreme court or other appellate court includes any order extending the deadlines set forth in this Paragraph.

29. Other Grounds for Objection to Use of Protected Materials Remain Applicable. Nothing in this Protective Order shall be construed as precluding any party from objecting to the use of Protected Materials on grounds other than confidentiality, including the lack of required relevance. Nothing in this Protective Order constitutes a waiver of the right to argue for more disclosure, provided, however, that unless and until such additional disclosure is ordered by the Commission or a court, all parties will abide by the restrictions imposed by the Protective Order.
30. Protection of Materials from Unauthorized Disclosure. All notices, applications, responses, or other correspondence shall be made in a manner which protects Protected Materials from unauthorized disclosure.
31. Return of Copies of Protected Materials and Destruction of Information Derived from Protected Materials. Following the conclusion of these proceedings, each Reviewing Party must, no later than thirty (30) days following receipt of the notice described below, return to the party asserting confidentiality all copies of the Protected Materials provided by that party pursuant to this Protective Order and all copies reproduced by a Reviewing Party, and counsel for each Reviewing Party must provide to the party asserting confidentiality a letter by counsel that, to the best of his or her knowledge, information, and belief, all copies of notes, memoranda, and other documents regarding or derived from the Protected Materials (including copies of Protected Materials) that have not been so returned, if any, have been destroyed, other than notes, memoranda, or other documents which contain information in a form which, if made public, would not cause disclosure of the substance of Protected Materials. As used in this Protective Order, "conclusion of these proceedings" refers to the exhaustion of available appeals, or the



running of the time for the making of such appeals, as provided by applicable law. If, following any appeal, the Commission conducts a remand proceeding, then the "conclusion of these proceedings" is extended by the remand to the exhaustion of available appeals of the remand, or the running of the time for making such appeals of the remand, as provided by applicable law. Promptly following the conclusion of these proceedings, counsel for the party asserting confidentiality will send a written notice to all other parties, reminding them of their obligations under this Paragraph. Nothing in this Paragraph shall prohibit counsel for each Reviewing Party from retaining two (2) copies of any filed testimony, brief, application for rehearing, hearing exhibit, or other pleading which refers to Protected Materials provided that any such Protected Materials retained by counsel shall remain subject to the provisions of this Protective Order.

32. Applicability of Other Law. This Protective Order is subject to the requirements of the Public Information Act, the Open Meetings Act, and any other applicable law, provided that parties subject to those acts will give the party asserting confidentiality notice, if possible under those acts, prior to disclosure pursuant to those acts.
33. Procedures for Release of Information Under Order. If required by order of a governmental or judicial body, the Reviewing Party may release to such body the confidential information required by such order; provided, however, that: (1) the Reviewing Party shall notify the party asserting confidentiality of such order at least five (5) calendar days in advance of the release of the information in order for the party asserting confidentiality to contest any release of the confidential information; (2) the Reviewing Party shall notify the producing party that there is a request for such information within five (5) calendar days of the date the Reviewing Party is notified of the request for information; and (3) the Reviewing Party shall use its best efforts to prevent such materials from being disclosed to the public. The terms of this Protective Order do not preclude the Reviewing Party from complying with any valid and enforceable order of a state or federal court with competent jurisdiction specifically requiring disclosure of Protected Materials earlier than contemplated herein.
34. Best Efforts Defined. The term "best efforts" as used in the preceding paragraph requires that the Reviewing Party attempt to ensure that disclosure is not made unless such disclosure is pursuant to a final order of a Texas governmental or Texas judicial body or

written opinion of the Texas Attorney General which was sought in compliance with the Public Information Act. The Reviewing Party is not required to delay compliance with a lawful order to disclose such information but is simply required to timely notify the party asserting confidentiality, or its counsel, that it has received a challenge to the confidentiality of the information and that the Reviewing Party will either proceed under the provisions of §552.301 of the Public Information Act, or intends to comply with the final governmental or court order.

35. Notify Defined. Notify, for purposes of Paragraphs 33 and 34, shall mean written notice to the party asserting confidentiality at least five (5) calendar days prior to release; including when a Reviewing Party receives a request under the Public Information Act. However, the Commission or OPC may provide a copy of Protected Materials to the Open Records Division of the OAG as provided herein.
36. Requests for Non-Disclosure. If the producing party asserts that the requested information should not be disclosed at all, or should not be disclosed to certain parties under the protection afforded by this Order, the producing party shall tender the information for *in camera* review to the presiding officers within 10 calendar days of the request. At the same time, the producing party shall file and serve on all parties its argument, including any supporting affidavits, in support of its position of non-disclosure. The burden is on the producing party to establish that the material should not be disclosed. The producing party shall serve a copy of the information under the classification of Highly Sensitive Protected Material to all parties requesting the information that the producing party has not alleged should be prohibited from reviewing the information. Parties wishing to respond to the producing party's argument for non-disclosure shall do so within five working days. Responding parties should explain why the information should be disclosed to them, including why disclosure is necessary for a fair adjudication of the case if the material is determined to constitute a trade secret. If the presiding officer finds that the information should be disclosed as Protected Material under the terms of this Protective Order, the presiding officer shall stay the order of disclosure for such period of time as the presiding officer deems necessary to allow the producing party to appeal the ruling to the Commission.

37. Sanctions Available for Abuse of Designation. If the presiding officer finds that a producing party unreasonably designated material as Protected Material or as Highly Sensitive Protected Material, or unreasonably attempted to prevent disclosure pursuant to Paragraph 36, the presiding officer may sanction the producing party pursuant to P.U.C. PROC. R. 22.161.
38. Modification of Protective Order. Each party shall have the right to seek changes in this Protective Order as appropriate from the presiding officer.
39. Breach of Protective Order. In the event of a breach of the provisions of this Protective Order, the producing party, if it sustains its burden of proof required to establish the right to injunctive relief, shall be entitled to an injunction against such breach without any requirements to post bond as a condition of such relief. The producing party shall not be relieved of proof of any element required to establish the right to injunctive relief. In addition to injunctive relief, the producing party shall be entitled to pursue any other form of relief to which it is entitled.

SIGNED AT AUSTIN, TEXAS as of the \_\_\_\_ day of \_\_\_\_\_, 2015.

\_\_\_\_\_

### Protective Order Certification

I certify my understanding that the Protected Materials are provided to me pursuant to the terms and restrictions of the Protective Order in this docket, and that I have been given a copy of it and have read the Protective Order and agree to be bound by it. I understand that the contents of the Protected Materials, any notes, memoranda, or any other form of information regarding or derived from the Protected Materials shall not be disclosed to anyone other than in accordance with the Protective Order and unless I am an employee of the Commission Staff or OPC shall be used only for the purpose of the proceeding in Docket No. \_\_\_\_\_. I acknowledge that the obligations imposed by this certification are pursuant to such Protective Order. Provided, however, if the information contained in the Protected Materials is obtained from independent public sources, the understanding stated herein shall not apply.

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Party Represented

\_\_\_\_\_  
Printed Name

\_\_\_\_\_  
Date

I certify that I am eligible to have access to Highly Sensitive Protected Material under the terms of the Protective Order in this docket.

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Party Represented

\_\_\_\_\_  
Printed Name

\_\_\_\_\_  
Date

DOCKET NO. \_\_\_\_\_

I request to view/copy the following documents:

Document requested	# of Copies	Non-Confidential	Confidential &/or H.S.

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Party Represented

\_\_\_\_\_  
Printed Name

\_\_\_\_\_  
Date

Prior Period Over-Under Recovery of TC-2 Collections

TC-2 Class

	May-18	Jun-18	Jul-18	Aug-18	Sep-18	Oct-18	Nov-18	Dec-18	Jan-19	Feb-19	Mar-19	Apr-19	May-19	Jun-19	Total
<b>Residential</b>															
Projected TC-2 Collections	5,010,443	5,746,508	7,667,829	9,130,189	9,411,131	8,835,794	7,409,781	5,794,889	5,741,251	6,599,050	5,707,348	5,028,515	5,224,634	6,027,116	93,334,478
Amounts Transferred to Trustee	5,536,387	5,625,998	8,253,019	9,815,214	8,377,799	9,245,345	7,518,693	5,558,993	4,943,766	5,436,640	5,570,099	5,148,246	4,990,603	5,925,037	91,945,838
Difference	(525,944)	120,511	(585,190)	(685,025)	1,033,332	(409,550)	(108,912)	235,896	797,485	1,162,411	137,249	(119,731)	234,031	102,079	1,388,639
Interest*	-	(47,450)	(61,713)	(23,188)	(35,666)	(48,554)	(69,704)	(81,458)	(99,953)	(26,220)	(31,623)	(46,710)	(57,756)	-	(629,995)
Administrative Fees, Servicing Fees, Operating Exp. Other True-up*														(2,343,311)	(2,343,311)
Charge-off True-up														2,496,688	2,496,688
<b>Total Residential True-up Adjustment</b>	<b>(525,944)</b>	<b>73,061</b>	<b>(646,904)</b>	<b>(708,213)</b>	<b>997,667</b>	<b>(458,105)</b>	<b>(178,616)</b>	<b>154,438</b>	<b>697,531</b>	<b>1,136,191</b>	<b>105,625</b>	<b>(166,441)</b>	<b>176,275</b>	<b>255,455</b>	<b>912,021</b>
<b>Commercial Energy</b>															
Projected TC-2 Collections	2,365,964	2,581,072	3,344,426	3,722,641	3,804,495	3,505,575	3,048,533	2,611,657	2,515,918	2,574,657	2,440,209	2,385,641	2,524,975	2,832,906	40,258,669
Amounts Transferred to Trustee	2,844,357	2,614,208	3,410,479	3,819,484	3,271,032	3,763,960	3,110,410	2,615,962	2,082,226	2,178,492	2,302,997	2,364,982	2,477,559	2,979,810	39,835,958
Difference	(478,393)	(33,136)	(66,053)	(96,843)	533,463	(258,385)	(61,877)	(4,305)	433,692	396,165	137,212	20,659	47,416	(146,904)	422,712
Interest*	-	(23,203)	(28,191)	(10,065)	(15,135)	(20,439)	(29,272)	(34,591)	(42,419)	(11,079)	(13,341)	(19,818)	(24,746)	-	(272,301)
Administrative Fees, Servicing Fees, Operating Exp. Other True-up*														(1,015,250)	(1,015,250)
Charge-off True-up														79,851	79,851
<b>Total Commercial Energy True-up Adjustment</b>	<b>(478,393)</b>	<b>(56,340)</b>	<b>(94,244)</b>	<b>(106,909)</b>	<b>518,328</b>	<b>(278,824)</b>	<b>(91,149)</b>	<b>(38,896)</b>	<b>391,273</b>	<b>385,086</b>	<b>123,871</b>	<b>841</b>	<b>22,670</b>	<b>(1,082,303)</b>	<b>(784,988)</b>
<b>Commercial Demand</b>															
Projected TC-2 Collections	4,681,685	4,728,740	5,204,321	5,344,637	5,425,157	5,257,726	5,152,447	5,001,924	4,923,761	4,951,860	4,857,665	4,808,610	4,834,803	4,923,580	70,096,916
Amounts Transferred to Trustee	5,184,229	4,645,351	4,899,833	5,603,132	4,836,870	5,844,782	5,375,195	5,581,324	4,489,146	4,799,576	4,991,533	4,752,510	4,762,353	5,217,919	70,983,753
Difference	(502,544)	83,389	304,488	(258,495)	588,287	(587,056)	(222,748)	(579,400)	434,615	152,284	(133,868)	56,100	72,450	(294,339)	(886,837)
Interest*	-	(41,784)	(46,819)	(16,129)	(23,869)	(32,140)	(46,650)	(57,046)	(71,581)	(19,115)	(23,442)	(35,166)	(44,156)	-	(457,897)
Administrative Fees, Servicing Fees, Operating Exp. Other True-up*														(1,809,076)	(1,809,076)
Charge-off True-up														203,808	203,808
<b>Total Commercial Demand True-up Adjustment</b>	<b>(502,544)</b>	<b>41,605</b>	<b>257,670</b>	<b>(274,624)</b>	<b>564,418</b>	<b>(619,196)</b>	<b>(269,398)</b>	<b>(636,446)</b>	<b>363,034</b>	<b>133,168</b>	<b>(157,311)</b>	<b>20,934</b>	<b>28,294</b>	<b>(1,899,607)</b>	<b>(2,950,002)</b>
<b>Muni &amp; Cotton Gin Energy</b>															
Projected TC-2 Collections	414,520	410,730	491,952	520,864	577,964	579,077	522,531	463,302	452,668	436,317	404,316	401,242	403,998	418,151	6,497,632
Amounts Transferred to Trustee	442,440	378,869	432,863	434,486	519,393	589,879	478,400	539,369	324,115	375,281	370,205	406,141	372,515	497,040	6,161,995
Difference	(27,920)	30,861	59,089	86,378	58,571	(10,803)	44,130	(76,066)	128,553	61,036	34,111	(4,899)	31,483	(78,889)	335,637
Interest*	-	(3,496)	(3,990)	(1,340)	(2,095)	(2,901)	(4,201)	(5,188)	(6,380)	(1,684)	(2,036)	(3,051)	(3,804)	-	(40,165)
Administrative Fees, Servicing Fees, Operating Exp. Other True-up*														(157,043)	(157,043)
Charge-off True-up														20	20
<b>Total Muni and Cotton Gin True-up Adjustment</b>	<b>(27,920)</b>	<b>27,366</b>	<b>55,099</b>	<b>85,038</b>	<b>56,476</b>	<b>(13,703)</b>	<b>39,929</b>	<b>(81,254)</b>	<b>122,173</b>	<b>59,352</b>	<b>32,075</b>	<b>(7,949)</b>	<b>27,680</b>	<b>(235,912)</b>	<b>138,449</b>
<b>Large Industrial Firm</b>															
Projected TC-2 Collections	371,144	370,933	370,736	370,480	370,212	352,974	348,279	346,227	346,015	346,278	345,742	345,372	345,027	344,506	4,973,923
Amounts Transferred to Trustee	614,981	298,504	334,927	593,103	516,810	587,508	143,047	507,975	309,739	346,142	400,652	310,997	146,495	588,432	5,699,312
Difference	(243,837)	72,428	35,809	(222,623)	(146,598)	(234,535)	205,232	(161,748)	36,276	136	(54,911)	34,375	198,532	(243,926)	(725,389)
Interest*	-	(3,883)	(3,968)	(1,461)	(2,236)	(3,053)	(3,960)	(4,889)	(6,019)	(1,586)	(1,839)	(2,862)	(3,432)	-	(39,287)
Administrative Fees, Servicing Fees, Operating Exp. Other True-up*														(145,251)	(145,251)
Charge-off True-up														-	-
<b>Total Large Industrial Firm True-up Adjustment</b>	<b>(243,837)</b>	<b>68,545</b>	<b>31,840</b>	<b>(224,084)</b>	<b>(148,834)</b>	<b>(237,587)</b>	<b>201,272</b>	<b>(166,636)</b>	<b>30,257</b>	<b>(1,450)</b>	<b>(56,850)</b>	<b>31,513</b>	<b>195,100</b>	<b>(389,178)</b>	<b>(909,928)</b>
<b>Standby Firm</b>															
Projected TC-2 Collections	278,342	278,342	278,342	278,342	278,342	226,758	216,872	216,872	216,872	216,872	216,872	216,872	216,872	216,872	3,353,444
Amounts Transferred to Trustee	307,832	216,247	321,492	320,313	241,838	284,550	9,434	387,351	34,369	402,394	212,207	26,679	184,568	277,534	3,226,807
Difference	(29,490)	62,095	(43,150)	(41,971)	36,504	(57,791)	207,438	(170,479)	182,503	(185,522)	4,664	190,193	32,304	(60,662)	126,637
Interest*	-	(2,228)	(2,688)	(925)	(1,335)	(1,754)	(2,182)	(2,839)	(3,272)	(942)	(1,141)	(1,594)	(1,980)	-	(22,878)
Administrative Fees, Servicing Fees, Operating Exp. Other True-up*														(82,238)	(82,238)
Charge-off True-up														-	-
<b>Total Standby Firm True-up Adjustment</b>	<b>(29,490)</b>	<b>59,867</b>	<b>(45,837)</b>	<b>(42,895)</b>	<b>35,169</b>	<b>(59,545)</b>	<b>205,257</b>	<b>(173,319)</b>	<b>179,231</b>	<b>(186,464)</b>	<b>3,523</b>	<b>188,599</b>	<b>30,324</b>	<b>(142,900)</b>	<b>21,521</b>
<b>Large Industrial Non-Firm</b>															
Projected TC-2 Collections	488,075	488,075	488,075	488,075	488,075	495,200	496,566	496,566	496,566	496,566	496,566	496,566	496,566	496,566	6,908,103
Amounts Transferred to Trustee	871,027	51,613	434,236	690,484	466,725	701,130	182,407	614,111	417,162	404,945	511,174	527,479	39,403	961,280	6,873,175
Difference	(382,952)	436,462	53,839	(202,409)	21,350	(205,929)	314,159	(117,545)	79,404	91,621	(14,608)	(30,913)	457,163	(464,714)	34,928
Interest*	-	(3,922)	(4,313)	(1,624)	(2,384)	(3,332)	(4,356)	(5,453)	(6,824)	(1,803)	(2,228)	(3,385)	(3,969)	-	(43,592)
Administrative Fees, Servicing Fees, Operating Exp. Other True-up*														(175,168)	(175,168)
Charge-off True-up														-	-
<b>Total Large Industrial Non-Firm True-up Adjustment</b>	<b>(382,952)</b>	<b>432,540</b>	<b>49,526</b>	<b>(204,033)</b>	<b>18,965</b>	<b>(209,261)</b>	<b>309,804</b>	<b>(122,998)</b>	<b>72,581</b>	<b>89,819</b>	<b>(16,835)</b>	<b>(34,298)</b>	<b>453,194</b>	<b>(639,882)</b>	<b>(183,831)</b>

**Prior Period Over-Under Recovery of TC-2 Collections**

Exhibit SGJ-1 Workpaper  
Page 2 of 2

TC-2 Class	May-18	Jun-18	Jul-18	Aug-18	Sep-18	Oct-18	Nov-18	Dec-18	Jan-19	Feb-19	Mar-19	Apr-19	May-19	Jun-19	Total
<b>Standby Non-Firm</b>															
Projected TC-2 Collections	65,366	65,366	65,366	65,366	65,366	48,630	45,423	45,423	45,423	45,423	45,423	45,423	45,423	45,423	738,842
Amounts Transferred to Trustee	73,259	53,820	77,039	59,845	71,716	50,209	(7,916)	96,153	(5,850)	107,363	45,663	(7,928)	37,983	57,421	708,777
Difference	(7,893)	11,546	(11,673)	5,521	(6,350)	(1,579)	53,339	(50,730)	51,273	(61,940)	(240)	53,351	7,440	(11,999)	30,065
Interest*	-	(540)	(649)	(209)	(318)	(400)	(485)	(644)	(721)	(215)	(259)	(354)	(437)	-	(5,232)
Administrative Fees, Servicing Fees, Operating Exp., Other True-up*														(18,064)	(18,064)
Charge-off True-up														-	-
<b>Total Standby Non-Firm True-up Adjustment</b>	(7,893)	11,006	(12,322)	5,312	(6,668)	(1,979)	52,854	(51,375)	50,551	(62,155)	(499)	52,997	7,003	(30,062)	6,770
<b>Total</b>															
Projected TC-2 Collections	13,675,540	14,669,766	17,911,048	19,920,595	20,420,742	19,301,734	17,240,431	14,976,859	14,738,473	15,667,024	14,514,140	13,728,240	14,092,297	15,305,119	226,162,007
Amounts Transferred to Trustee	15,874,511	13,885,610	18,163,889	21,336,061	18,302,183	21,067,362	16,809,669	15,901,237	12,594,672	14,050,832	14,404,531	13,529,106	13,011,478	16,504,473	225,435,614
Difference	(2,198,971)	784,156	(252,841)	(1,415,466)	2,118,560	(1,765,628)	430,762	(924,378)	2,143,800	1,616,191	109,609	199,134	1,080,819	(1,199,355)	726,393
Interest*	-	(126,506)	(152,330)	(54,942)	(83,039)	(112,572)	(160,809)	(192,108)	(237,169)	(62,644)	(76,010)	(112,939)	(140,280)	-	(1,511,347)
Administrative Fees, Servicing Fees, Operating Exp., Other True-up*														(5,745,402)	(5,745,402)
Charge-off True-up														2,780,367	2,780,367
<b>Total Prior Period True-up Adjustment</b>	(2,198,971)	657,650	(405,171)	(1,470,408)	2,035,521	(1,878,201)	269,953	(1,116,486)	1,906,632	1,553,547	33,599	86,195	940,539	(4,164,389)	(3,749,988)

\*Allocated using cumulative collections

## Collections Data

TC Class	Estimated Collections - CSFB Model	Actual Collections	+/- Previous Year Adjustments	Total TC Payments Received	Difference
<b>For Month of May 2018</b>					
Residential	5,010,443 31	5,536,386 83		5,536,386 83	525,943 52
Commercial & Small Industrial - Energy	2,365,963 97	2,844,356 65		2,844,356 65	478,392 68
Commercial & Small Industrial - Demand	4,681,695 46	5,184,229 22		5,184,229 22	502,543 76
Large Industrial - Firm	371,144 05	614,980 61		614,980 61	243,836 56
Large Industrial - Non-Firm	488,074 99	871,026 66		871,026 66	382,951 67
Standby - Firm	278,342 25	307,831 85		307,831 85	29,489 60
Standby - Non-Firm	65,366 32	73,259 10		73,259 10	7,892 78
Municipal & Cotton Gin	414,520 06	442,440 16		442,440 16	27,920 10
	13,675,540 41	15,874,511 08	0 00	15,874,511 08	2,198,970 67
<b>For Month of June 2018</b>					
Residential	5,746,508 36	5,625,997 77		5,625,997 77	(120,510 59)
Commercial & Small Industrial - Energy	2,581,071 78	2,614,208 16		2,614,208 16	33,136 38
Commercial & Small Industrial - Demand	4,728,740 14	4,645,350 99		4,645,350 99	(83,389 15)
Large Industrial - Firm	370,932 56	298,504 14		298,504 14	(72,428 42)
Large Industrial - Non-Firm	488,074 99	51,613 15		51,613 15	(436 461 84)
Standby - Firm	278,342 25	216,247 20		216,247 20	(62 095 05)
Standby - Non-Firm	65,366 32	53,820 38		53,820 38	(11 545 94)
Municipal & Cotton Gin	410,729 95	379,868 54		379,868 54	(30 861 41)
	14,669,766 36	13,885,610 33	0 00	13,885,610 33	(784,156 03)
<b>For Month of July 2018</b>					
Residential	7,667,828 75	9,024,379 26	(771 360 38)	8,253,018 88	585,190 13
Commercial & Small Industrial - Energy	3,344,426 00	3,730,684 11	(320,205 32)	3,410,478 79	66,052 79
Commercial & Small Industrial - Demand	5,204,321 22	5,355,610 39	(455,777 27)	4,899,833 12	(304,488 10)
Large Industrial - Firm	370,736 01	509,252 11	(174,324 73)	334,927 38	(35,808 63)
Large Industrial - Non-Firm	488,074 99	604,521 89	(170 286 04)	434,235 85	(53,839 14)
Standby - Firm	278,342 25	306,285 17	15,206 70	321,491 87	43,149 62
Standby - Non-Firm	65,366 32	76,471 55	567 90	77,039 45	11,673 13
Municipal & Cotton Gin	491,952 05	482,028 22	(49 164 93)	432,863 29	(59 088 76)
	17,911,047 58	20,089,232 70	(1,925,344 07)	18,163,888 63	252,841 05
<b>For Month of August 2018</b>					
Residential	9,130,188 90	9,562,588 03	252,626 04	9,815,214 07	685,025 17
Commercial & Small Industrial - Energy	3,722,641 26	3,591,431 85	228,052 45	3,819,484 30	96,843 04
Commercial & Small Industrial - Demand	5,344,636 87	5,406,951 92	196,179 67	5,603,131 59	258,494 72
Large Industrial - Firm	370,480 29	657,623 71	(64 520 58)	593,103 13	222,622 84
Large Industrial - Non-Firm	488,074 99	681,771 28	8,712 90	690,484 18	202,409 19
Standby - Firm	278,342 25	317,584 19	2,728 59	320,312 78	41,970 53
Standby - Non-Firm	65,366 32	64,298 73	(4,453 79)	59,844 94	(5,521 38)
Municipal & Cotton Gin	520,863 87	461,277 25	(26,791 54)	434,485 71	(86 378 16)
	19,920,594 75	20,743,526 96	592,533 74	21,336,060 70	1,415,465 95
<b>For Month of September 2018</b>					
Residential	9,411,130 75	8,602,516 04	(224,717 51)	8,377,798 53	(1 033 332 22)
Commercial & Small Industrial - Energy	3,804,495 08	3,344,621 21	(73,589 45)	3,271,031 76	(533 463 32)
Commercial & Small Industrial - Demand	5,425,157 44	4,912,005 07	(75,134 79)	4,836,870 28	(588,287 16)
Large Industrial - Firm	370,211 68	281,803 94	235,205 63	516,808 57	146,597 89
Large Industrial - Non-Firm	488,074 99	279,136 77	187,588 63	466,725 40	(21,349 59)
Standby - Firm	278,342 25	239,772 92	2,065 11	241,838 03	(36,504 22)
Standby - Non-Firm	65,366 32	66,126 65	5,589 59	71,716 24	6,349 92
Municipal & Cotton Gin	577,963 76	454,169 77	65,222 92	519,392 69	(58 571 07)
	20,420,742 27	18,179,952 37	122,230 13	18,302,182 50	(2,118,559 77)
<b>For Month of October 2018</b>					
Residential	8,835,794 17	9,336,707 89	(91 363 25)	9,245,344 64	409,550 47
Commercial & Small Industrial - Energy	3,505,575 12	3,696,340 34	67,619 44	3,763,959 78	258,384 66
Commercial & Small Industrial - Demand	5,257,725 71	5,676,219 79	168,562 26	5,844,782 05	587,056 34
Large Industrial - Firm	352,973 71	556,255 61	31,252 75	587,508 36	234,534 65
Large Industrial - Non-Firm	495,200 35	696,879 69	4 249 99	701,129 68	205,929 33
Standby - Firm	226,758 32	253,036 87	31,512 81	284,549 68	57,791 36
Standby - Non-Firm	48,630 22	46,431 91	3,777 11	50,209 02	1,578 80
Municipal & Cotton Gin	579,076 58	591,897 89	(2 018 67)	589,879 22	10,802 64
	19,301,734 20	20,853,769 99	213,592 44	21,067,362 43	1,765,628 23
<b>For Month of November 2018</b>					
Residential	7,409,780 97	7,283,593 24	235,099 95	7,518,693 19	108,912 22
Commercial & Small Industrial - Energy	3,048,533 38	3,073,836 15	36,573 86	3,110,410 01	61,876 63
Commercial & Small Industrial - Demand	5,152,446 57	5,478,298 63	(103,104 10)	5,375,194 53	222,747 96
Large Industrial - Firm	348,278 88	179,086 19	(36,038 94)	143,047 25	(205 231 63)
Large Industrial - Non-Firm	496,566 00	230,332 45	(47,925 76)	182,406 69	(314 159 31)
Standby - Firm	216,871 77	33,574 98	(24 141 35)	9,433 63	(207,438 14)
Standby - Non-Firm	45,422 58	1,661 82	(9 578 24)	(7 916 42)	(53 338 00)
Municipal & Cotton Gin	522,530 74	532,136 66	(53 736 30)	478,400 36	(44 130 38)
	17,240,430 89	16,812,520 12	(2,850 88)	16,809,659 24	(430,761 65)
<b>For Month of December 2018</b>					
Residential	5,794,888 81	5,009,462 04	549,531 19	5,558,993 23	(235 895 58)
Commercial & Small Industrial - Energy	2,611,656 56	2,376,409 45	239,552 05	2,615,961 50	4,304 94
Commercial & Small Industrial - Demand	5,001,924 27	5,127,037 31	454,286 49	5,581,323 80	579,399 53
Large Industrial - Firm	346,227 09	477,914 96	30,059 71	507,974 67	161,747 58
Large Industrial - Non-Firm	496,566 00	558,164 05	55,947 28	614,111 33	117,545 33
Standby - Firm	216,871 77	367,834 64	19 516 28	387,350 92	170,479 15
Standby - Non-Firm	45,422 58	87,662 40	8,490 64	96,153 04	50,730 46
Municipal & Cotton Gin	463,302 37	429,692 55	109,676 30	539,368 85	76,066 48
	14,976,859 44	14,434,177 40	1,467,059 94	15,901,237 34	924,377 90
<b>For Month of January 2019</b>					
Residential	5,741,250 52	5,220,908 94	(277 141 13)	4,943,765 81	(797,484 71)
Commercial & Small Industrial - Energy	2,515,918 18	2,164,303 35	(82,077 45)	2,082,228 90	(433,692 28)
Commercial & Small Industrial - Demand	4,923,760 82	4,692,486 70	(203,340 71)	4,489,145 99	(434 614 83)
Large Industrial - Firm	346,014 88	304,851 23	4,887 69	309,738 92	(36 275 76)
Large Industrial - Non-Firm	496,566 00	427,327 05	(10,165 32)	417,161 73	(79,404 27)
Standby - Firm	216,871 77	56,778 47	(22,409 43)	34,369 04	(182,502 73)
Standby - Non-Firm	45,422 58	2,483 84	(8,333 83)	(5,849 99)	(51,272 57)
Municipal & Cotton Gin	452,668 18	375,341 79	(51,226 72)	324,115 07	(128 553 11)
	14,738,472 74	13,244,479 37	(649,806 90)	12,594,672 47	(2,143,800 27)



## For Month of February 2019

Residential	6,599,050 46	6,048,392 72	(611 752 86)	5,436,639 86	(1 162 410 60)
Commercial & Small Industrial - Energy	2,574,657 41	2,331,605 90	(153 113 69)	2,178,492 21	(396 165 20)
Commercial & Small Industrial - Demand	4,951,860 05	4,939,608 41	(140 030 02)	4,799,576 39	(152,283 66)
Large Industrial - Firm	346,278 07	359,371 27	(13 229 30)	346,141 97	(136 10)
Large Industrial - Non-Firm	496,566 00	426,197 37	(21 252 65)	404,944 72	(91 621 28)
Standby - Firm	216,871 77	200,923 70	201,469 98	402,393 68	185,521 91
Standby - Non-Firm	45,422 58	45,003 65	62,359 18	107,362 83	61,940 25
Municipal & Cotton Gin	436,317 17	386,743 31	(11,462 54)	375,280 77	(61,036 40)
	15,667,023.51	14,737,844 33	(887,011 90)	14,050,832 43	(1,616,191 08)

## For Month of March 2019

Residential	5,707,347 86	5,391,686 13	178,413 16	5,570,099 29	(137,248 57)
Commercial & Small Industrial - Energy	2,440,209 35	2,325,991 04	(22 993 83)	2,302,997 21	(137 212 14)
Commercial & Small Industrial - Demand	4,857,664 64	5,112,443 96	(120 910 91)	4,991,533 05	133,868 41
Large Industrial - Firm	345,741 88	384,222 42	16,430 03	400,652 45	54,910 57
Large Industrial - Non-Firm	496,566 00	481,899 81	29 274 17	511,173 98	14,607 98
Standby - Firm	216,871 77	210,605 79	1,601 63	212,207 42	(4,664 35)
Standby - Non-Firm	45,422 58	45,073 12	589 62	45,662 74	240 16
Municipal & Cotton Gin	404,315 85	392,311 52	(22 106 87)	370,204 55	(34 111 30)
	14,514,139 93	14,344,233 79	60,296 90	14,404,530 69	(109,609 24)

## For Month of April 2019\*

Residential	5,028,514 81	5,028,514 81	119,731 09	5,148,245 90	119,731 09
Commercial & Small Industrial - Energy	2,385,640 67	2,385,640 67	(20 658 53)	2,364,982 14	(20,658 53)
Commercial & Small Industrial - Demand	4,808,609 60	4,808,609 60	(56 099 93)	4,752,509 67	(56,099 93)
Large Industrial - Firm	345,371 95	345,371 95	(34 374 87)	310,997 08	(34,374 87)
Large Industrial - Non-Firm	496,566 00	496,566 00	30,913 01	527,479 01	30,913 01
Standby - Firm	216,871 77	216,871 77	(190 192 93)	26,678 84	(190 192 93)
Standby - Non-Firm	45,422 58	45,422 58	(53 350 58)	(7,928 00)	(53,350 58)
Municipal & Cotton Gin	401,242 25	401,242 25	4,898 63	406,140 88	4,898 63
	13,728,239.63	13,728,239.63	(199,134 11)	13,529,105 52	(199,134 11)

## For Month of May 2019\*

Residential	5,224,633 98	5,224,633 98	(234,031 05)	4,990,602 93	(234 031 05)
Commercial & Small Industrial - Energy	2,524,974 94	2,524,974 94	(47 415 51)	2,477,559 43	(47 415 51)
Commercial & Small Industrial - Demand	4,834,803 12	4,834,803 12	(72 450 06)	4,762,353 06	(72 450 06)
Large Industrial - Firm	345,026 54	345,026 54	(198 531 92)	146,494 62	(198 531 92)
Large Industrial - Non-Firm	496,566 00	496,566 00	(457 163 19)	39,402 81	(457 163 19)
Standby - Firm	216,871 77	216,871 77	(32 304 02)	184,567 75	(32,304 02)
Standby - Non-Firm	45,422 58	45,422 58	(7 440 07)	37,982 51	(7 440 07)
Municipal & Cotton Gin	403,967 74	403,967 74	(31 483 06)	372,514 68	(31,483 06)
	14,092,296 67	14,092,296.67	(1,080,818 88)	13,011,477.79	(1,080,818 88)

## For Month of June 2019\*

Residential	6,027,116 10	6,027,116 10	(102 078 69)	5,925,037 41	(102 078 69)
Commercial & Small Industrial - Energy	2,832,905 58	2,832,905 58	146,904 18	2,979,809 76	146,904 18
Commercial & Small Industrial - Demand	4,923,579 93	4,923,579 93	294,339 11	5,217,919 04	294,339 11
Large Industrial - Firm	344,505 70	344,505 70	243,926 39	588,432 09	243,926 39
Large Industrial - Non-Firm	496,566 00	496,566 00	464,713 66	961,279 66	464,713 66
Standby - Firm	216,871 77	216,871 77	60,662 38	277,534 15	60,662 38
Standby - Non-Firm	45,422 58	45,422 58	11,998 65	57,421 23	11,998 65
Municipal & Cotton Gin	418,150 93	418,150 93	78,888 84	497,039 77	78,888 84
	15,305,118 59	15,305,118 59	1,199,354 52	16,504,473 11	1,199,354 52

## Total Period

Residential	93,334,477 73	92,922,881 77	50,400 39	91,945,836 33	(1 388 639 39)
Commercial & Small Industrial - Energy	40,258,669 28	39,837,309 39	76,888 20	39,835,957 59	(422 711 68)
Commercial & Small Industrial - Demand	70,096,915 85	71,097,233 04	820,537 35	70,983,752 78	886,836 93
Large Industrial - Firm	4,973,923 11	5,658,570 39	460,441 48	5,699,312 25	725,389 13
Large Industrial - Non-Firm	6,908,103 31	6,798,568 17	695,398 35	6,873,174 85	(34,928 46)
Standby - Firm	3,353,443 71	3,161,091 08	44,292 18	3,226,806 83	(126,636 88)
Standby - Non-Firm	738,842 49	698,560 90	8,213 51	708,777 08	(30,065 40)
Municipal & Cotton Gin	6,497,631 50	6,151,298 58	116,744 16	6,161,994 54	(335,636 96)
Total	226,162,006 97	226,325,513 33	(889,899 07)	225,435,614 26	(726,392 71)

\*Actual collections equal estimate for 4/2019, 5/2019 and 6/2019

## WP - TC Rev Req't

Prior Year Over / (Under) Recovery

For the period July 01, 2018 through June 30, 2019

Amount

Excess Funds Subaccount Balance after July 1, 2018 payment

14,175,468.62

**INFLOWS**

Amounts actually transferred to Trust Through March 31, 2019.

168,432,457.57

Amounts estimated to be transferred to Trust for April, May and June 2019

29,515,950.90

\$197,948,408.47

Interest Earnings on Funds in Sub Accounts

1,511,346.51

TOTAL Inflows

\$199,459,754.98**TC Outflows and Funding**

Period 07-01-18 to 06-30-19

Item

Amount

Principal - Paid on 01/02/19

103,516,880.10

Interest - Paid on 01/02/19

10,361,839.27

Principal - To be paid on 07/01/19

84,440,958.86

Interest - To be paid on 07/01/19

7,615,381.17

Trustee Fees &amp; Expenses - Paid on 01/02/19

-

Trustee Fees &amp; Expenses - To be paid on 07/01/19

-

Servicing Fee - Paid on 01/02/19

434,925.00

Servicing Fee - To be paid on 07/01/19

434,925.00

Administration Fee - Paid on 01/02/19

50,000.00

Administration Fee - To be paid on 07/01/19

50,000.00

Operating Expenses - Paid on 01/02/19

17,500.00

Estimated Operating Expenses - To be paid on 07/01/19

17,500.00

Investment Earnings on Capital Subaccount to be Released to Note Issuer - 01/02/19

82,991.29

Est Invstmnt Earnings on Cap Subaccount to be Released to Note Issuer - 07/01/19

81,967.38

Outflows and Funding

207,104,868.07**Net (Shortfall) / Surplus****6,530,355.53****Total Adjustment Before Charge-off True-Up****\$6,530,355.53**

Charge-off True-up

(\$2,780,367.27)

**Total True Up****\$3,749,988.26**

WP - Prior Year Over/(Under) Recovery

**AMOUNTS TRANSFERRED TO TRUST THROUGH May 31, 2019**

	<u>Amount</u> <u>Transferred (1)</u>	<u>Interest Earned on</u> <u>General Subaccount (2)</u>	<u>Interest Earned on</u> <u>Excess Funds Subaccount (2)</u>	<u>Interest Earned on</u> <u>Capital Subaccount (2)</u>
Jun-18	2,272,915.62	94,684.46	19,785.24	12,035.85
Jul-18	18,163,888.63	119,495.90	20,415.21	12,419.10
Aug-18	21,336,060.70	21,937.62	19,656.34	13,348.35
Sep-18	18,302,182.50	49,779.69	19,776.03	13,482.95
Oct-18	21,067,362.43	79,212.32	19,836.15	13,523.95
Nov-18	16,809,669.24	123,423.79	22,229.26	15,155.54
Dec-18	15,901,237.34	154,955.48	22,091.22	15,061.40
Jan-19	12,594,672.47	197,009.21	23,879.01	16,280.30
Feb-19	14,050,832.43	23,259.40	22,407.83	16,976.53
Mar-19	14,404,530.69	40,286.46	20,290.79	15,432.89
Apr-19	13,529,105.52	73,005.67	22,681.62	17,251.33
May-19	13,011,477.79	101,990.00	22,263.29	16,026.33
Jun-19	<u>16,504,473.11</u>	<u>-</u>	<u>-</u>	<u>-</u>
TOTAL	195,675,492.85	1,079,040.00	255,311.99	<u>176,994.52</u> <u>1,511,346.51</u>

(1) The June 2018 amount is the prior year's true up portion (box "j" or "k") of the June 2018 Monthly Servicer's Certificate. Actuals amounts are given for July 2018 through March 2019; April, May and June 2019 are estimates, based on CSFB model projected collections.

(2) The May 2019 interest earned is estimated to be the same as April 2019. Next year it will be trued up on the Prior Year Recovery tab. The June 2019 interest earned will be included in the 2020 annual true-up.

## Transition Bonds - Calculation of Principal and Interest Required Funding on 07/1/2019

<u>Tranche A-1</u>	Interest To Be Funded	Principal To Be Funded	Total To Be Funded
1/1/2019	-	-	-
7/1/2019	-	-	-
Total	-	-	-
<u>Tranche A-2</u>	Interest To Be Funded	Principal To Be Funded	Total To Be Funded
1/1/2019	-	-	-
7/1/2019	-	-	-
Total	-	-	-
<u>Tranche A-3</u>	Interest To Be Funded	Principal To Be Funded	Total To Be Funded
1/1/2019	-	-	-
7/1/2019	-	-	-
Total	-	-	-
<u>Tranche A-4</u>	Interest To Be Funded	Principal To Be Funded	Total To Be Funded
1/1/2019	-	-	-
7/1/2019	-	-	-
Total	-	-	-
<u>Tranche A-5</u>	Interest To Be Funded	Principal To Be Funded	Total To Be Funded
1/1/2019	10,361,839.27	103,516,880.10	113,878,719.37
7/1/2019	7,615,381.17	84,440,958.86	92,056,340.03
Total	17,977,220.44	187,957,838.96	205,935,059.40
Total to be funded by 7/1/2019	17,977,220.44	187,957,838.96	205,935,059.40

**Prior Period Charge-off True-up for TC2  
by REP in TCC Service Territory**

Exhibit SGJ-1 Workpaper

Page 1 of 3

REP	TC2 Billings (4/2018 - 3/2019)	REP Charge-offs	9/2019-8/2020 Factor (%)
1	\$ 31,800	\$ 1,033	3.250%
2	106,122	2,489	2.345%
3	14,258,998		0.000%
4	4,174,469		0.000%
5	317,377		0.000%
6	17,755		0.000%
7	3,548,380		0.000%
8	4,397,497	77,720	1.767%
9	718,208		0.000%
10	1,386,890	45,500	3.281%
11	223,854		0.000%
12	19,710		0.000%
13	491,091		0.000%
14	621,935	2,268	0.365%
15	247,139		0.000%
16	8,400,378		0.000%
17	360,877		0.000%
18	329,247		0.000%
19	9,105,696		0.000%
20	163,719		0.000%
21	7,230		0.000%
22	11,165		0.000%
23	60,776		0.000%
24	42,787		0.000%
25	21,733		0.000%
26	333,770		0.000%
27	1,162,828		0.000%
28	849,580		0.000%
29	2,195,609		0.000%
30	3,644		0.000%
31	433,686		0.000%
32	1,464,989		0.000%
33	484,622		0.000%
34	59,560		0.000%
35	14,322		0.000%
36	5		0.000%
37	1,604		0.000%
38	1,483,831		0.000%
39	3,651		0.000%
40	664,568		0.000%
41	211,932		0.000%
42	4,484,518		0.000%
43	698,975		0.000%
44	3,785,953		0.000%
45	258,332		0.000%
46	2,537,686	32,344	1.275%
47	32,713		0.000%
48	37,714		0.000%
49	6,425,904	616,885	9.600%
50	232,124		0.000%
51	6,086,537		0.000%
52	157,275	1,038	0.660%
53	214,579		0.000%
54	178,416	1,269	0.711%
55	6,511,753		0.000%
56	29,409		0.000%
57	203,552	49,363	24.251%
58	2,044,014		0.000%

**Prior Period Charge-off True-up for TC2  
by REP in TCC Service Territory**

Exhibit SGJ-1 Workpaper

Page 2 of 3

REP	TC2 Billings (4/2018 - 3/2019)	REP Charge-offs	9/2019-8/2020 Factor (%)
59	983		0.000%
60	4,521		0.000%
61	69		0.000%
62	14,641	130	0.890%
63	1,718,574		0.000%
64	2,079		0.000%
65	2,943		0.000%
66	3,511,077	1,917	0.055%
67	22		0.000%
68	266,611		0.000%
69	463,063		0.000%
70	242,003		0.000%
71	10,444		0.000%
72	28		0.000%
73	12,014		0.000%
74	7		0.000%
75	13,491		0.000%
76	2		0.000%
77	189		0.000%
78	206,298	2,816	1.365%
79	136		0.000%
80	10,258		0.000%
81	49,405		0.000%
82	1		0.000%
83	110,404		0.000%
84	21,255		0.000%
85	13,653,967	604,336	4.426%
86	4,814,485	207,558	4.311%
87	3,775,923		0.000%
88	9,564,192	25,335	0.265%
89	3,478,728		0.000%
90	64		0.000%
91	1,607		0.000%
92	3,307		0.000%
93	1,775		0.000%
94	1,170,617		0.000%
95	51,225		0.000%
96	1,701,903		0.000%
97	1,076,386		0.000%
98	118,994		0.000%
99	724,133		0.000%
100	11,444,801	71,786	0.627%
101	7,513,234		0.000%
102	129,148		0.000%
103	37,027		0.000%
104	1,002,667	121	0.012%
105	10		0.000%
106	1,702,187		0.000%
107	123,836		0.000%
108	73,396		0.000%
109	393,670		0.000%
110	33,680		0.000%
111	423,051		0.000%
112	3,527,628		0.000%
113	5,562,968		0.000%
114	1,392,796		0.000%
115	527,963		0.000%
116	983,094	116,987	11.900%

**Prior Period Charge-off True-up for TC2  
by REP in TCC Service Territory**

Exhibit SGJ-1 Workpaper

Page 3 of 3

REP	TC2 Billings (4/2018 - 3/2019)	REP Charge-offs	9/2019-8/2020 Factor (%)
117	20,320,853	634,020	3.120%
118	314,356		0.000%
119	3,245,117		0.000%
120	157,830	935	0.593%
121	141		0.000%
122	82,861	731	0.883%
123	1,086		0.000%
124	9,025		0.000%
125	231,562		0.000%
126	1,173		0.000%
127	1,189		0.000%
128	1,279		0.000%
129	1,110,070	141,537	12.750%
	\$ 199,498,009	\$ 2,638,118	1.322%

## TC-2 Billing Units - Projected Year-End August 2020

Class	Jan-20	Feb-20	Mar-20	Apr-20	May-20	Jun-20	Jul-20	Aug-20	Sep-19	Oct-19	Nov-19	Dec-19	TOTAL
<b>Residential kWh</b>	873,000,507	681,687,312	590,312,054	629,575,554	744,340,912	1,014,107,288	1,106,201,734	1,127,839,446	1,064,923,297	862,107,631	666,703,961	727,190,695	10,087,990,391
<b>Commercial Energy kWh</b>	147,812,163	134,818,578	129,883,542	142,987,894	161,001,297	190,297,761	193,683,740	196,595,969	200,628,530	170,888,702	148,871,191	146,385,326	1,963,854,692
<b>Muni &amp; Cotton Gin Energy kWh</b>	33,792,447	32,075,257	31,971,231	32,764,663	34,230,161	35,816,506	36,250,191	39,854,753	46,388,042	41,998,560	37,383,475	35,728,492	438,253,777
<b>Commercial Demand kW/kVA</b>	2,322,351	2,272,742	2,238,731	2,228,482	2,284,193	2,333,338	2,335,006	2,376,833	2,332,330	2,282,139	2,261,928	2,212,211	27,480,283
<b>Large Industnal Firm kW/kVA</b>	384,567	384,277	383,990	383,702	383,415	383,128	382,842	382,556	385,589	385,217	385,837	384,580	4,609,700
<b>Standby Firm - Daily kW/kVA</b>	1,055,491	1,788,193	1,566,592	1,965,544	1,181,401	1,151,287	1,163,430	1,267,247	959,392	1,146,890	1,033,535	1,217,134	15,496,136
<b>Large Industrial Non-Firm kW/kVA</b>	226,857	226,857	226,857	226,857	226,857	226,857	226,857	226,857	226,857	226,857	226,857	226,857	2,722,283
<b>Standby Non-Firm - Daily kW/kVA</b>	165,720	503,192	156,534	284,026	75,914	228,095	91,127	-	46,971	418,641	231,993	374,334	2,576,547



CONTRACT DEMANDS AS OF 6/2001	
	Jun-01
Customer 1	12,500
Customer 2	16,017
Customer 3	18,000
Customer 4	46,000
Customer 5	8,000
Customer 6	25,000
Customer 7	12,500
Customer 8	29,631
Customer 9	20,600
Customer 10	15,136
Customer 11	12,500
Customer 12	30,500
Large Industrial Firm Subtotal	<b>246,384</b>
Additional Metered Load	
Total Large Industrial Firm	<b>246,384</b>
Customer 13	32,500
Customer 14	21,483
Customer 15	28,000
Customer 16	11,200
Customer 17	25,000
Customer 18	77,000
Customer 19	21,000
Customer 20	13,620
Customer 21	3,000
Customer 22	25,000
Customer 23	7,180
Large Industrial Non-Firm	<b>264,983</b>

ADJUSTED CONTRACT DEMANDS - YEAR END AUGUST 2020

	Jan-20	Feb-20	Mar-20	Apr-20	May-20	Jun-20	Jul-20	Aug-20	Sep-19	Oct-19	Nov-19	Dec-19	TOTAL	AVERAGE
Customer 1	11,605	11,609	11,612	11,616	11,619	11,623	11,626	11,629	11,589	11,593	11,597	11,601	139,319	11,610
Customer 2	14,870	14,875	14,880	14,884	14,888	14,893	14,897	14,901	14,850	14,855	14,860	14,865	178,518	14,877
Customer 3	16,711	16,716	16,722	16,727	16,732	16,737	16,741	16,746	16,688	16,694	16,700	16,706	200,620	16,718
Customer 4	42,706	42,720	42,733	42,746	42,759	42,771	42,784	42,795	42,648	42,663	42,678	42,692	512,695	42,725
Customer 5	7,427	7,430	7,432	7,434	7,436	7,439	7,441	7,443	7,417	7,420	7,422	7,425	89,164	7,430
Customer 6	23,210	23,217	23,225	23,232	23,239	23,245	23,252	23,258	23,178	23,186	23,194	23,202	278,639	23,220
Customer 7	11,605	11,609	11,612	11,616	11,619	11,623	11,626	11,629	11,589	11,593	11,597	11,601	139,319	11,610
Customer 8	27,509	27,518	27,527	27,535	27,543	27,551	27,559	27,567	27,472	27,481	27,491	27,500	330,254	27,521
Customer 9	19,125	19,131	19,137	19,143	19,149	19,154	19,160	19,165	19,099	19,106	19,112	19,119	229,598	19,133
Customer 10	14,052	14,057	14,061	14,065	14,070	14,074	14,078	14,082	14,033	14,038	14,043	14,048	168,699	14,058
Customer 11	11,605	11,609	11,612	11,616	11,619	11,623	11,626	11,629	11,589	11,593	11,597	11,601	139,319	11,610
Customer 12	28,316	28,325	28,334	28,343	28,351	28,359	28,367	28,375	28,277	28,287	28,297	28,307	339,939	28,328
Large Industrial Firm Subtotal	<b>228,742</b>	<b>228,815</b>	<b>228,887</b>	<b>228,956</b>	<b>229,025</b>	<b>229,091</b>	<b>229,156</b>	<b>229,219</b>	<b>228,430</b>	<b>228,510</b>	<b>228,589</b>	<b>228,666</b>	<b>2,746,086</b>	<b>228,840</b>
Additional Metered Load	155,825	155,462	155,103	154,745	154,390	154,037	153,686	153,337	157,159	156,707	157,248	155,914	1,863,614	155,301
Total Large Industrial Firm	<b>384,567</b>	<b>384,277</b>	<b>383,990</b>	<b>383,702</b>	<b>383,415</b>	<b>383,128</b>	<b>382,842</b>	<b>382,556</b>	<b>385,589</b>	<b>385,217</b>	<b>385,837</b>	<b>384,580</b>	<b>4,609,700</b>	<b>384,142</b>
Customer 13	27,824	27,824	27,824	27,824	27,824	27,824	27,824	27,824	27,824	27,824	27,824	27,824	333,886	27,824
Customer 14	18,392	18,392	18,392	18,392	18,392	18,392	18,392	18,392	18,392	18,392	18,392	18,392	220,704	18,392
Customer 15	23,971	23,971	23,971	23,971	23,971	23,971	23,971	23,971	23,971	23,971	23,971	23,971	287,656	23,971
Customer 16	9,589	9,589	9,589	9,589	9,589	9,589	9,589	9,589	9,589	9,589	9,589	9,589	115,062	9,589
Customer 17	21,403	21,403	21,403	21,403	21,403	21,403	21,403	21,403	21,403	21,403	21,403	21,403	256,836	21,403
Customer 18	65,921	65,921	65,921	65,921	65,921	65,921	65,921	65,921	65,921	65,921	65,921	65,921	791,054	65,921
Customer 19	17,978	17,978	17,978	17,978	17,978	17,978	17,978	17,978	17,978	17,978	17,978	17,978	215,742	17,978
Customer 20	11,660	11,660	11,660	11,660	11,660	11,660	11,660	11,660	11,660	11,660	11,660	11,660	139,924	11,660
Customer 21	2,568	2,568	2,568	2,568	2,568	2,568	2,568	2,568	2,568	2,568	2,568	2,568	30,820	2,568
Customer 22	21,403	21,403	21,403	21,403	21,403	21,403	21,403	21,403	21,403	21,403	21,403	21,403	256,836	21,403
Customer 23	6,147	6,147	6,147	6,147	6,147	6,147	6,147	6,147	6,147	6,147	6,147	6,147	73,763	6,147
Large Industrial Non-Firm	<b>226,857</b>	<b>226,857</b>	<b>226,857</b>	<b>226,857</b>	<b>226,857</b>	<b>226,857</b>	<b>226,857</b>	<b>226,857</b>	<b>226,857</b>	<b>226,857</b>	<b>226,857</b>	<b>226,857</b>	<b>2,722,283</b>	<b>226,857</b>

## STANDBY DAILY DEMANDS - ADJUSTED YEAR END AUGUST 2021

	Jan-20	Feb-20	Mar-20	Apr-20	May-20	Jun-20	Jul-20	Aug-20	Sep-19	Oct-19	Nov-19	Dec-19	Total	Average
Customer 1	753	311	20,632	82,729	-	-	-	-	-	274	-	2,012	106,711	8,893
Customer 2	5,800	15,212	8,603	16,735	-	-	-	16,708	-	-	-	36,516	99,574	8,298
Customer 3	93,963	143,041	191,674	121,039	120,941	64,614	-	-	-	-	14,061	95,483	844,815	70,401
Customer 4	36,436	40,430	38,867	80,185	76,886	177,932	-	-	-	3,459	14,346	21,075	489,616	40,801
Customer 5	-	-	-	-	68,583	50,480	3,803	-	-	149,843	156,129	-	428,838	35,737
Customer 6	-	100,694	11,323	58,113	-	81,495	-	81,633	59,483	53,530	71,661	96,567	614,499	51,208
Customer 7	5	-	59	29	53	23	1,894	1,786	-	-	6	-	3,856	321
Customer 8	-	16,455	31,157	2,636	-	-	6,895	-	-	504	-	4,407	62,055	5,171
Customer 9	736	2,366	-	2,389	89,560	17,405	30,781	187,009	211,753	210,054	107	-	752,162	62,680
Customer 10	-	-	-	171,335	202,733	5,285	236	71,424	212,831	-	-	-	663,844	55,320
Customer 11	672,192	1,117,680	805,520	857,718	373,259	461,300	567,983	445,624	150,789	259,694	249,806	635,398	6,596,964	549,747
Customer 12*	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Customer 13	-	-	32,326	-	32,449	-	109,646	-	-	-	15,167	28,801	218,389	18,199
Customer 14	-	-	14,071	-	-	-	-	-	-	-	-	-	14,071	1,173
Customer 15	32,917	-	-	53,421	16,287	173,801	290,954	306,707	316,586	92,928	202,972	30,775	1,517,348	126,446
Customer 16	10,409	4,077	24,968	8,307	31,413	55,537	25,331	89,055	7,950	27,062	13,146	6,980	304,234	25,353
Customer 17*	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Customer 18*	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Customer 19	202,281	106,235	134,678	351,906	164,346	63,414	24,633	10,669	-	342,134	296,134	194,387	1,890,817	157,568
Customer 20	-	-	-	223	4,890	-	-	56,632	-	-	-	-	61,746	5,145
Customer 21	-	241,691	252,715	158,778	-	-	101,273	-	-	7,407	-	64,732	826,595	68,883
<b>Standby Firm</b>	<b>1,055,491</b>	<b>1,788,193</b>	<b>1,566,592</b>	<b>1,965,544</b>	<b>1,181,401</b>	<b>1,151,287</b>	<b>1,163,430</b>	<b>1,267,247</b>	<b>959,392</b>	<b>1,146,890</b>	<b>1,033,535</b>	<b>1,217,134</b>	<b>15,496,136</b>	<b>1,291,345</b>
Customer 22	-	-	-	-	-	-	-	-	-	-	-	2,702	2,702	225
Customer 23	-	-	-	-	-	5,276	-	-	-	-	-	-	5,276	440
Customer 24	-	42,761	-	-	-	-	-	-	-	-	-	5,519	48,280	4,023
Customer 25	-	-	-	-	50,175	-	-	-	-	257,139	-	-	307,313	25,609
Customer 26	-	-	846	-	-	-	-	-	-	-	-	-	846	70
Customer 27	-	-	-	544	156	-	-	-	46,971	-	-	-	47,670	3,973
Customer 28	165,720	460,431	134,917	261,938	-	222,819	-	-	-	137,190	214,228	341,560	1,938,803	161,567
Customer 29*	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Customer 30	-	-	17,852	-	25,583	-	-	-	-	-	16,587	24,553	84,576	7,048
Customer 31	-	-	2,919	-	-	-	-	-	-	-	-	-	2,919	243
Customer 32	-	-	-	21,544	-	-	10,236	-	-	24,313	1,179	-	57,272	4,773
Customer 33	-	-	-	-	-	-	80,891	-	-	-	-	-	80,891	6,741
<b>Standby Non-Firm</b>	<b>165,720</b>	<b>503,192</b>	<b>156,534</b>	<b>284,026</b>	<b>75,914</b>	<b>228,095</b>	<b>91,127</b>	<b>-</b>	<b>46,971</b>	<b>418,641</b>	<b>231,993</b>	<b>374,334</b>	<b>2,576,547</b>	<b>214,712</b>

\*Customer 12,17,18,29 are no longer on the AEP Texas system

## HISTORIC DAILY STANDBY DEMANDS - JULY 2000 THROUGH JUNE 2001

	Jan-01	Feb-01	Mar-01	Apr-01	May-01	Jun-01	Jul-00	Aug-00	Sep-00	Oct-00	Nov-00	Dec-00	Total	Average
Customer 1	860	300	21,700	95,580	-	-	-	-	-	320	-	2,375	121,135	10,095
Customer 2	6,622	14,659	9,049	19,334	-	-	-	18,176	-	-	-	43,108	110,948	9,246
Customer 3	107,280	137,840	201,600	139,840	126,720	64,000	-	-	-	-	15,760	112,720	905,760	75,480
Customer 4	41,600	38,960	40,880	92,640	80,560	176,240	-	-	-	4,040	16,080	24,880	515,880	42,990
Customer 5	-	-	-	-	71,860	50,000	3,860	-	-	175,000	175,000	-	475,720	39,643
Customer 6	-	97,033	11,909	67,140	-	80,720	-	88,805	61,294	62,517	80,323	113,999	663,740	55,312
Customer 7	6	-	62	34	56	23	1,922	1,943	-	-	7	-	4,053	338
Customer 8	-	15,857	32,770	3,046	-	-	6,998	-	-	589	-	5,203	64,463	5,372
Customer 9	840	2,280	-	2,760	93,840	17,240	31,240	203,440	218,200	245,320	120	-	815,280	67,940
Customer 10	-	-	-	197,949	212,420	5,235	240	77,699	219,311	-	-	-	712,854	59,405
Customer 11	767,462	1,077,042	847,235	990,950	391,095	456,914	576,445	484,777	155,380	303,294	280,000	750,100	7,080,694	590,058
Customer 12*	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Customer 13	-	-	34,000	-	34,000	-	111,280	-	-	-	17,000	34,000	230,280	19,190
Customer 14	-	-	14,800	-	-	-	-	-	-	-	-	-	14,800	1,233
Customer 15	37,582	-	-	61,719	17,065	172,148	295,289	333,655	326,225	108,530	227,505	36,330	1,616,048	134,671
Customer 16	11,884	3,929	26,261	9,597	32,914	55,009	25,708	96,880	8,192	31,605	14,735	8,240	324,954	27,080
Customer 17*	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Customer 18*	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Customer 19	230,951	102,372	141,653	406,569	172,199	62,811	25,000	11,606	-	399,574	331,927	229,478	2,114,140	176,178
Customer 20	-	-	-	258	5,124	-	-	61,608	-	-	-	-	66,990	5,583
Customer 21	-	232,903	265,802	183,441	-	-	102,782	-	-	8,651	-	76,417	869,996	72,500
<b>Rider 10 - Standby Firm</b>	<b>1,205,087</b>	<b>1,723,175</b>	<b>1,647,721</b>	<b>2,270,857</b>	<b>1,237,853</b>	<b>1,140,340</b>	<b>1,180,764</b>	<b>1,378,589</b>	<b>988,602</b>	<b>1,339,440</b>	<b>1,158,457</b>	<b>1,436,850</b>	<b>16,707,735</b>	<b>1,392,311</b>
Customer 22	-	-	-	-	-	-	-	-	-	-	-	3,583	3,583	299
Customer 23	-	-	-	-	-	5,011	-	-	-	-	-	-	5,011	418
Customer 24	-	44,367	-	-	-	-	-	-	-	-	-	7,318	51,685	4,307
Customer 25	-	-	-	-	28,320	-	-	-	-	330,000	-	-	358,320	29,860
Customer 26	-	-	720	-	-	-	-	-	-	-	-	-	720	60
Customer 27	-	-	-	631	88	-	-	-	156	-	-	-	875	73
Customer 28	173,990	477,721	114,873	303,960	-	211,625	-	-	-	176,063	269,682	452,938	2,180,852	181,738
Customer 29*	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Customer 30	-	-	15,200	-	14,440	-	-	-	-	-	20,880	32,560	83,080	6,923
Customer 31	-	-	2,485	-	-	-	-	-	-	-	-	-	2,485	207
Customer 32	-	-	-	25,000	-	-	7,795	-	-	31,202	1,484	-	65,481	5,457
Customer 33	-	-	-	-	-	-	61,600	-	-	-	-	-	61,600	5,133
<b>Rider 11 - Standby Non-Firm</b>	<b>173,990</b>	<b>522,088</b>	<b>133,278</b>	<b>329,591</b>	<b>42,848</b>	<b>216,636</b>	<b>69,395</b>	<b>-</b>	<b>156</b>	<b>537,265</b>	<b>292,046</b>	<b>496,399</b>	<b>2,813,692</b>	<b>234,474</b>

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