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APPLICATION OF SOUTHWESTERN § BEFORE THE STATE OFFICE
 ELECTRIC POWER COMPANY FOR §
 CERTIFICATE OF CONVENIENCE §
 AND NECESSITY AUTHORIZATION § OF
 AND RELATED RELIEF FOR THE §
 ACQUISITION OF WIND § ADMINISTRATIVE HEARINGS
 GENERATION FACILITIES §

**SOUTHWESTERN ELECTRIC POWER COMPANY'S RESPONSE TO
 INTERNATIONAL BROTHERHOOD OF ELECTRICAL WORKERS
 LOCAL UNION 738'S FIRST REQUEST FOR INFORMATION**

OCTOBER 10, 2019

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Question No. IBEW 1-1:

With respect to Mr. Brice's testimony that the proposed acquisition "will not result in the transfer of jobs from Texas" (p. 27:22-26), please identify the factors considered in asserting that jobs will not be transferred from Texas. Please identify and provide any documents reflecting the metrics or standards used in making any such determination.

Response No. IBEW 1-1:

The Company has entered into a fixed price operation and maintenance agreement with the developer wherein the developer will provide all routine maintenance to the facilities over the initial ten year period. Please see testimony of Jay Godfrey at page 29, line 24 through page 30, line 2. Please also refer to Highly Sensitive Confidential Exhibit JFG-3. As a result, the Company does not anticipate transfer of jobs from Texas. See also the response to IBEW 1-2.

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Question No. IBEW 1-2:

Please provide SWEPCO's forecast of the effect of the proposed acquisition on the future operations of SWEPCO's generation facilities in Texas. Please identify and provide any documents created, obtained, or reviewed in making the forecast.

Response No. IBEW 1-2:

The information responsive to this request is CONFIDENTIAL under the terms of the Protective Order. The Confidential information is available for review at the Austin offices of American Electric Power Company (AEP), 400 West 15th Street, Suite 1520, Austin, Texas, 78701, (512) 481-4562, during normal business hours.

SWEPCO's generation facilities in Texas are Welsh, Pirkey, Knox Lee, Lone Star, and Wilkes. Knox Lee units 2,3, and 4 and Lone Star are assumed to be retired before the Selected Wind Facilities would go in service, whether they are constructed or not. None of the planned retirement dates for any of the Company's generation units (Texas and non-Texas) are impacted by the Company's proposal in this case. As described in Company witness Torpey's errata testimony, and illustrated in the IBEW 1-2 Confidential_Attachment 1.xlsx, production levels of the Company's generating units are not expected to be impacted.

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Question No. IBEW 1-3:

Please provide SWEPCO's forecast of the effect of the proposed acquisition on SWEPCO's future staffing levels. Please identify and provide any documents created, obtained, or reviewed in making the forecast.

Response No. IBEW 1-3:

No impact on the staffing of SWEPCO is anticipated as a result of the acquisition. Please also see the responses to IBEW 1-1 and 1-2.

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Question No. IBEW 1-4:

During the past five years, has the company performed or commissioned any assessments of its current staffing levels or future need? If so, please provide a copy of any such assessment.

Response No. IBEW 1-4:

Last year, our Generation management conducted a review of our future staffing levels within our generation fleet. The results of the review were that SWEPCO is currently adequately staffed and no changes were needed outside of the standing practice. No written assessment was prepared. Further review of staffing levels will occur with each significant business event within the Generation business unit.

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