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

PUBLIC UTILITY COMMISSION
COMMISSION
FILING CLERK

OF TEXAS

**SOUTHWESTERN ELECTRIC POWER COMPANY'S PRIVILEGE INDEX FOR
TEXAS INDUSTRIAL ENERGY CONSUMERS' SECOND SET OF REQUESTS FOR
INFORMATION**

Southwestern Electric Power Company (SWEPCO) provides the attached privilege index, marked as Exhibit A, prepared in accordance with 16 Tex. Admin. Code (TAC) § 22.144(d)(2) for privileged information that is responsive to Request for Information (RFI) No. 2-4 in the Second Set of RFIs from Texas Industrial Energy Consumers (TIEC). Pursuant to an agreement with TIEC, the deadline for filing the privilege index was extended to August 14, 2019. Accordingly, this index is timely filed.

To date, SWEPCO has not identified any privileged documents responsive to this request other than the materials identified on the attached privilege index. SWEPCO recognizes that it is under a continuing obligation to supplement discovery responses. If SWEPCO identifies any additional privileged documents, it will provide a supplemental privilege index at that time.

Respectfully submitted,

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**ATTORNEYS FOR SOUTHWESTERN
ELECTRIC POWER COMPANY.**

CERTIFICATE OF SERVICE

I certify that a true and correct copy of this motion was served on all parties of record this
14th day of August, 2019.

Stephanie Green
Stephanie Green

Item No.	RFI No.	Bates No.	Document Title (Date)	Preparer/Custodian ¹	Recipients ¹	Privilege Claimed	Explanation
1	TIEC 2-4	000001	Wind RFP (11/28/2018)	Bobby Gilliam	Antonio P Smyth, Raja Sundararajan, Tom Brice, John C Crespo, Shelli A Sloan, Jay F Godfrey CC: Jonathan McCartney, Patrick T. Wiggins, Monica Locke, Emily Bearden	Attorney-Client Communication	Confidential communication rendering legal opinion on applicability of order to RFP criteria
2	TIEC 2-4	000002	CSP EEI Info (11/7/2018)	Antonio Smyth	Tom Brice, Steven Fate, Raja Sundararajan, Adam Hickman, Brian Weber, John Crespo, JS Solomon, Jay Godfrey, Shelli Sloan	Work Product	Transmittal to draft communications prepared at the request of counsel in anticipation of litigation
3	TIEC 2-4	000003-000006	Customer Savings Plan_Q&A (11/7/2018)	Antonio Smyth	Tom Brice, Steven Fate, Raja Sundararajan, Adam Hickman, Brian Weber, John Crespo, JS Solomon, Jay Godfrey, Shelli Sloan	Work Product	Draft communications prepared at the request of counsel in anticipation of litigation
4	TIEC 2-4	000007	Regulatory Litigation Communication Plan (11/13/2018)	John Crespo	Brian Weber, Antonio Smyth, Adam Hickman, Peggy Simmons, Malcom Smoak, Steven Fate, Tom Brice, Emily Shuart, Mellissa McHenry, Carey Sullivan, Tiffini Jackson, Raja Sundararajan, Jay	Attorney-Client Communication; Work Product	Counsel's request for assistance to develop communication plans in anticipation of and for use during regulatory litigation

¹ The following individuals are in-house counsel for American Electric Power Service Corporation ("AEPSC") and its affiliates: John Crespo, Randy Ryan, Joann Worthington, Melissa Gage, and Jerry Huerta. Outside counsel also representing SWEPCO or PSO includes Bobby Gilliam, Jonathan McCartney, Patrick T. Wiggins, Monica Locke, and Emily Bearden. All other preparers and recipients reflect AEPSC/SWEPCO/PSO.

					Godfrey, JS Solomon, Tammy Ridout; cc: Joann Worthington, Melissa Gage, Jerry Huerta		
5	TIEC 2-4	000008	Re: CSP EEI Info (11/7/2018)	Steven Fate	Antonio Smyth, Tom Brice, Raja Sundararajan, Adam Hickman, Brian Weber, John Crespo, JS Solomon, Jay Godfrey, Shelli Sloan	Work Product	Transmittal to draft communications prepared at the request of counsel in anticipation of litigation
6	TIEC 2-4	000009-000012	SWEPSCO & PSO Customer Savings Plan Slide (11/7/2018)	Steven Fate	Antonio Smyth, Tom Brice, Raja Sundararajan, Adam Hickman, Brian Weber, John Crespo, JS Solomon, Jay Godfrey, Shelli Sloan	Work Product	Draft communications prepared at the request of counsel in anticipation of litigation
7	TIEC 2-4	000013	RE: Customer Savings Plan – External Communications Plan (11/13/2018)	Carey Sullivan	Tiffini Jackson, John Crespo; cc: Brian Weber, Antonio Smyth, Adam Hickman, Peggy Simmons, Malcom Smoak, Steven Fate, Tom Brice, Emily Shuart, Melissa McHenry, Raja Sundararajan, Jay Godfrey, JS Solomon, Tammy Ridout, Joann Worthington, Melissa Gage, Jerry Huerta	Work Product	Transmittal to draft communications prepared at the request of counsel in anticipation of litigation
8	TIEC 2-4	000014-000019	SWEPSCO Wind RFP Comm Plan 11-13-18	Carey Sullivan	Tiffini Jackson, John Crespo; cc: Brian Weber, Antonio Smyth, Adam	Work Product	Draft communications prepared at the request of counsel in

					Hickman, Peggy Simmons, Malcom Smoak, Steven Fate, Tom Brice, Emily Shuart, Melissa McHenry, Raja Sundararajan, Jay Godfrey, JS Solomon, Tammy Ridout, Joann Worthington, Melissa Gage, Jerry Huerta		anticipation of litigation
9	TIEC 2-4	000020	RE: Customer Savings Plan – External Communications Plan (11/13/2018)	Tiffini Jackson	John Crespo; cc: Brian Weber, Antonio Smyth, Adam Hickman, Peggy Simmons, Malcom Smoak, Steven Fate, Tom Brice, Emily Shuart, Melissa McHenry, Carey Sullivan, Raja Sundararajan, Jay Godfrey, JS Solomon, Tammy Ridout, Joann	Work Product	Transmittal to draft communications prepared at the request of counsel in anticipation of litigation
10	TIEC 2-4	000021- 000027	PSO 2019 Wind RFP Comms 11 13	Tiffini Jackson	John Crespo; cc: Brian Weber, Antonio Smyth, Adam Hickman, Peggy Simmons, Malcom Smoak, Steven Fate, Tom Brice, Emily Shuart, Melissa McHenry, Carey Sullivan, Raja Sundararajan, Jay Godfrey, JS Solomon, Tammy Ridout, Joann	Work Product	Draft communications prepared at the request of counsel in anticipation of litigation

11	TIEC 2-4	000028	RE: Louisiana Feedback and Potential CSP Revisions (12/10/2018)	Brian Weber	Randy G Ryan, Antonio P Smyth, Jay F Godfrey, John C Crespo, Raja Sundararajan, Tom Brice, Steven Fate	Attorney-Client Communication; Work Product	Transmittal of materials developed for purposes of discussion with counsel in preparation of litigation
12	TIEC 2-4	000029- 000030	Comparison (12/10/2018)	Brian Weber	Randy G Ryan, Antonio P Smyth, Jay F Godfrey, John C Crespo, Raja Sundararajan, Tom Brice, Steven Fate	Attorney-Client Communication; Work Product	Materials developed for purposes of discussion with counsel in preparation of litigation
13	TIEC 2-4	000031	Conf Call (12/5/2018)	Tom Brice	Bobby Gilliam	Attorney-Client Communication	Request for counsel's assistance
14	TIEC 2-4	000032	RE: EEI CSP Info (11/7/2018)	John Crespo	Antonio Smyth	Attorney-Client Communication; Work Product	Privileged communication on draft communications prepared at the request of counsel in anticipation of litigation
15	TIEC 2-4	000033	RE: CSP EEI Info (11/7/2018)	Steven Fate	JS Solomon	Work Product	Draft communications prepared at the request of counsel in anticipation of litigation
16	TIEC 2-4	000033	RE: CSP EEI Info (11/7/2018)	JS Solomon	Steven Fate	Work Product	Draft communications prepared at the request of counsel in anticipation of litigation
17	TIEC 2-4	000033	RE: CSP EEI Info (11/7/2018)	Steven Fate	Antonio Smyth, Tom Brice, Raja Sundararajan,	Work Product	Transmittal to draft communications

					Adam Hickman, Brian Weber, John Crespo, JS Solomon, Jay Godfrey, Shelli Sloan; cc: Emily Shuart		prepared at the request of counsel in anticipation of litigation
18	TIEC 2-4	000033-000034	CSP EEI Info (11/7/2018)	Antonio Smyth	Tom Brice, Steven Fate, Raja Sundararajan, Adamn Hickman, Brian Weber, John Crespo, JS Solomon, Jay Godfrey Shelli Sloan		Transmittal to draft communications prepared at the request of counsel in anticipation of litigation
19	TIEC 2-4	000035-000044	SWEPCO and PSO Customer Savings Plan (10/18/2018)	Adam Hickman	Jay Godfrey	Work Product	Draft document summarizing project including draft communications prepared at the direction of counsel in anticipation of litigation
20	TIEC 2-4	000045	RE: Follow-up draft from recent RFP design workshop (10/22/2018)	Jay Godfrey	JS Solomon	Work Product	Preparation of draft communications prepared at the direction of counsel in anticipation of litigation
21	TIEC 2-4	000045-000046	RE: Follow-up draft from recent RFP design workshop (10/19/2018)	JS Solomon	Jay Godfrey	Work Product	Preparation of draft communications prepared at the direction of counsel in anticipation of litigation
22	TIEC	000047	Answers to	Antonio	Paul Chodak	Work Product	Transmittal of draft

	2-4		Questions (11/11/2018)	Smyth			communications prepared at the direction of counsel in anticipation of litigation
23	TIEC 2-4	000048	Attached is a draft CSP Work Plan (10/11/2018)	Brian Weber	Antonio Smyth	Work Product	Transmittal to draft regulatory work plan prepared at the direction of counsel in anticipation of litigation
24	TIEC 2-4	000049- 000063	CSP Work Plan (10/11/2018)	Brian Weber	Antonio Smyth	Work Product	Draft regulatory work plan prepared at the direction of counsel in anticipation of litigation
25	TIEC 2-4	000064	CSP Communications Plan – request for input/feedback (11/20/2018)	Adam Hickman	Antonio Smyth, Brian Weber	Work Product	Transmittal to draft regulatory communication plan and communications prepared at the request of counsel in anticipation of litigation
26	TIEC 2-4	000065- 000076	Comprehensive Communications Plan v.1 (11/20/2018)	Adam Hickman	Antonio Smyth, Brian Weber	Work Product	Draft regulatory communication plan and communications prepared at the request of counsel in anticipation of litigation
27	TIEC	000077	CSP Slides	Antonio	JS Solomon	Work Product	Transmittal to draft

	2-4		(10/18/2018)	Smyth			document summarizing project including draft communications prepared at the direction of counsel in anticipation of litigation
28	TIEC 2-4	000078- 000089	SWEPCO and PSO Customer Savings Plan (10/18/2018)	Antonio Smyth	JS Solomon	Work Product	Draft document summarizing project including draft communications prepared at the direction of counsel in anticipation of litigation
29	TIEC 2-4	000090	RE: Regulatory Talking Points – CSP (10/26/2018)	JS Solomon	Adam Hickman, Antonio Smyth, Raja Sundararajan, Brian Weber; cc: Shelli Sloan	Work Product	Preparation of draft communications prepared at the direction of counsel in anticipation of litigation
30	TIEC 2-4	000091	RE: Regulatory Talking Points – CSP (10.25.2018)	Adam Hickman	JS Solomon, Antonio Smyth, Raja Sundararajan, Brian Weber	Work Product	Transmittal to draft regulatory communication plan and communications prepared at the request of counsel in anticipation of litigation
31	TIEC 2-4	000092- 000093	SWEPCO and PSO Customer Savings	Adam Hickman	JS Solomon, Antonio Smyth, Raja	Work Product	Draft regulatory communication plan

			Plan_Regulatory Talk Points (10/25/2018)		Sundararajan, Brian Weber		and communications prepared at the request of counsel in anticipation of litigation
32	TIEC 2-4	000094	RE: Regulatory Talking Points – CSP (10/26/2018)	Adam Hickman	JS Solomon, Antonio Smyth, Raja Sundararajan, Brian Weber; cc: Shelli Sloan	Work Product	Transmittal to draft regulatory communication plan and communications prepared at the request of counsel in anticipation of litigation
33	TIEC 2-4	000095- 000096	PSO Customer Savings Plan_Regulatory Talking Points (10/26/2018)	Adam Hickman	JS Solomon, Antonio Smyth, Raja Sundararajan, Brian Weber; cc: Shelli Sloan	Work Product	Draft regulatory communication plan and communications prepared at the request of counsel in anticipation of litigation
34	TIEC 2-4	000097- 000098	SWEPSCO Customer Savings Plan_Regulatory Talking Points (10/26/2018)	Adam Hickman	JS Solomon, Antonio Smyth, Raja Sundararajan, Brian Weber; cc: Shelli Sloan	Work Product	Draft regulatory communication plan and communications prepared at the request of counsel in anticipation of litigation
35	TIEC 2-4	000099	RE: Regulatory talking points – CSP (10/25/2018)	JS Solomon	Adam Hickman, Antonio Smyth, Raja Sundararajan, Brian Weber;	Work Product	Preparation of draft communications prepared at the direction of counsel in anticipation of

							litigation
36	TIEC 2-4	000100- 000101	Customer Savings Plan (10/25/2018)	JS Solomon	Adam Hickman, Antonio Smyth, Raja Sundararajan, Brian Weber;	Work Product	Draft communications prepared at the direction of counsel in anticipation of litigation
37	TIEC 2-4	000102	Updated CSP Slide & Points (11/7/2018)	Antonio Smyth	Bette Rozsa, Darcy Reese, Mark McCullough, Paul Chodak, Lisa Barton, Charles Patton, Raja Sundararajan, JS Solomon	Work Product	Transmittal to draft communications prepared at the request of counsel in anticipation of litigation