



Control Number: 20311



Item Number: 386



American Electric Power
801 Pennsylvania Ave., Ste 735
Washington DC 20004 2615
AEP.com

10/27/2017

20311

November 7, 2017

Honorable Kimberly D. Bose
Secretary
Federal Energy Regulatory Commission
888 First St., N.E.
Washington D.C. 20426

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FEDERAL ENERGY COMMISSION
FILINGS CLERK

Amanda Riggs Conner
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Re: Southwestern Electric Power Company
Docket No. ER18-_____

Dear Secretary Bose:

Southwestern Electric Power Company ("SWEPCO") hereby submits for Federal Energy Regulatory Commission ("Commission") review support for the actual construction work in progress ("CWIP") expenditures that SWEPCO recorded in calendar year 2016, and for its projected 2017 CWIP expenditures. As discussed in more detail below, the CWIP expenditures are an input to rate formulas included in certain SWEPCO wholesale power sales agreements on file with the Commission.

Background and Reason for Filing

SWEPCO currently has in place (and on file with the Commission) wholesale power sales agreements that calculate the capacity and energy charges pursuant to rate formulas that permit SWEPCO to recover, among other costs, those related to 100% of CWIP expenditures for pollution control facilities and fuel conversion facilities as recorded on SWEPCO's books and records, and 50% of all of SWEPCO's other CWIP expenditures. The agreements also provide for SWEPCO to make informational filings to support both the projected and actual CWIP expenditures reflected in such formulas.¹

¹ The wholesale customers are (i) East Texas Electric Cooperative, Inc. and Northeast Texas Electric Cooperative, Inc.; (ii) the City of Minden, Louisiana; (iii) Northeast Texas Electric Cooperative, Inc.; and (iv) the City of Prescott, Arkansas, and the relevant agreements are on file as SWEPCO Rate Schedule Nos. 129, 128, 119 and 127, respectively.

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The formula rate agreements provide for SWEPCO to project its current-year costs, including CWIP expenditures, which costs form the basis for the bills for the remainder of the year. By May 31st of the following year, SWEPCO performs a “true-up” calculation to reflect the actual costs incurred during the prior calendar year. As to CWIP, SWEPCO agreed to provide the customers and the Commission workpapers showing the projected and actual CWIP expenses on a project-specific basis. SWEPCO also agreed to provide a workpaper demonstrating that customers will not be charged for both capitalized Allowance for Funds Used During Construction (“AFUDC”) and corresponding amounts of CWIP in rate base. SWEPCO notes that the customers will not be charged for any corresponding AFUDC as a result of different accounting or ratemaking treatments by SWEPCO’s state regulatory authorities.

In accordance with the formula rate agreements, the difference between the projected and actual CWIP expenditures is reflected in the annual true-up. If the Commission requires a recalculation of the actual CWIP expenditures after SWEPCO has completed the annual true-up, SWEPCO will make a further adjustment. The amounts projected for 2017 were included with other SWEPCO projected cost and revenue items that go into the calculation of the projected 2017 capacity rates. Any variation between the projected and actual expenditures will be included in next year’s true-up; consequently, there can be no under- or over-collection of the actual 2017 CWIP costs. This filing is consistent with the CWIP filing that SWEPCO submitted last year in Docket No. ER16-1605-000.

Request for Waiver of Filing Requirements

Consistent with the Commission practice as to these formula rate agreements, SWEPCO’s annual filings do not amend, supersede, or in any way change the provisions of the agreements or the formulas. The formulas are the “rates” that have been accepted for filing, and the annual adjustments (including for CWIP costs) are expressly provided for in those agreements. Therefore, SWEPCO respectfully requests waiver of any of the rate-change filing and notice requirements in Section 35.13 of the Commission’s regulations as necessary to permit SWEPCO to recover the actual 2016 costs through the 2016 trued-up rates and to include the projected CWIP costs in the 2017 projected rates. This practice is consistent with Commission precedent granting waiver of filing and notice requirements for rate calculations prescribed by an agreement on file with Commission. *See, e.g., Central Hudson Gas & Electric Corp.*, 60 FERC ¶ 61,106, *reh’g denied*, 61 FERC ¶ 61,089 (1992).

Kimberly D. Bose, Secretary
November 7, 2017
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SWEPCO requests that communications and correspondence concerning this filing be directed to the following persons:

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A copy of this filing has been served on each of the customers served under the affected formula rate agreements, as well as on the Arkansas Public Service Commission, the Louisiana Public Service Commission and the Public Utility Commission of Texas. If you have any questions concerning this filing, please do not hesitate to contact the undersigned.

Respectfully submitted,

/s/ Amanda Riggs Conner

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Counsel for American Electric Power Service Corporation

Enclosures

SOUTHWESTERN ELECTRIC POWER COMPANY
13 Month Average Construction Work in Progress (CWIP)
For the Year Ending December 31, 2016
(For All Customers)

Production CWIP

Month	Pollution Control	Other	Total
Dec-15	544,511 / 15	28,836 / 174	573,347 / 890
Jan-16	559,240,361	25,655 / 532	584,895,893
Feb-16	575,613,163	23,843,732	599,456,894
Mar-16	347,468,275	23,646,914	371,115,189
Apr-16	222,946,757	70,329,302	243,276,060
May-16	220,428,871	19,575,069	240,003,940
Jun-16	13,758,308	18,685,938	32,444,246
Jul-16	14,384,100	18,904,556	33,288,658
Aug-16	14,850,661	19,550,404	34,401,066
Sep-16	15,204,578	19,600,416	34,804,994
Oct-16	15,290,549	25,233,305	40,523,854
Nov-16	13,575,801	21,011,072	34,586,873
Dec-16	4,636,296	21,924,148	26,560,444
Total	2,561,909,435	286,796,065	2,848,705,501
13 Month Avg	197,069,957	22,061,236	219,131,192

NOTE: "Pollution Control" includes air and water pollution
"Other" includes solid waste and other

Production CWIP AFUDC

Month	Pollution Control	Other	Total
Dec-15	42,183,327	829,789	43,013,116
Jan-16	45,310,417	737,435	46,047,853
Feb-16	48,333,611	661,120	48,994,732
Mar-16	30,849,315	544,719	31,394,034
Apr-16	22,540,319	512,589	23,072,908
May-16	22,958,322	525,711	23,484,033
Jun-16	1,158,886	343,681	1,502,567
Jul-16	1,204,718	245,069	1,449,787
Aug-16	1,220,836	214,946	1,435,782
Sep-16	1,238,462	203,854	1,442,316
Oct-16	1,254,052	251,396	1,505,448
Nov-16	984,170	276,791	1,260,961
Dec-16	175,222	319,593	494,814
Total	219,411,759	5,696,694	225,098,454
13 Month Avg	16,677,828	437,438	17,315,266
13 Month Avg (50%)		218,719	

Production CWIP Net

Month	Pollution Control	Other	Total
Dec-15	502,328,388	28,006,385	530,334,773
Jan-16	513,929,944	24,918,097	538,848,041
Feb-16	527,279,551	23,182,111	550,461,663
Mar-16	316,618,960	23,102,195	339,721,155
Apr-16	200,406,438	19,796,714	220,203,152
May-16	197,470,549	19,049,358	216,519,907
Jun-16	12,599,320	18,342,257	30,941,576
Jul-16	13,179,382	18,659,489	31,838,871
Aug-16	13,629,826	19,335,458	32,965,284
Sep-16	13,966,116	19,396,562	33,362,678
Oct-16	14,036,497	24,981,909	39,018,405
Nov-16	12,591,632	20,734,280	33,325,912
Dec-16	4,461,074	21,604,556	26,065,630
Total	2,342,497,676	281,109,371	2,623,607,047
13 Month Avg	180,192,129	21,623,798	201,815,927
13 Month Avg (50%)		10,811,899	

ENVIRON CODE		MAJOR LOCATION	FUNDING PROJ	DESCRIPTION	FUNCTION	Amount	Jan-18	Feb-18	Mar-18	Apr-18	May-18	Jun-18	Jul-18	Aug-18	Sep-18	Oct-18	Nov-18	Dec-18	Grand Total		
A1 Production	A1 Production	Arenas-Hu Generating Plant	X00000010	WS CI SEPCO C PWB	Steam Generation Plant					51.98									91.98		
			X00000023	DLH Environmental Cont	Steam Generation Plant		723.37	1.9	34.85	19.92									770.04		
A1 Production	A1 Production	Doe-Hill Plant and Lignite Mine	X00000021	FC Upr Mod	Steam Generation Plant														895.96		
			X00000030	FC Upr Mod	Steam Generation Plant														895.96		
A1 Production	A1 Production	Know-Lee Generating Plant	X00000010	WS CI SEPCO C PWB	Steam Generation Plant		18,475,115.37	192,888.81	169,512,560.78	204,022,965.91	207,258,213.84	172,168.6	250,210.17	777,955.74	46,512.75	25,760.59	352,565.53	217,713.02		656,564.54	
			X00000010	WS CI SEPCO C PWB	Steam Generation Plant														656,564.54		
A1 Production	A1 Production	Mattoon Generating Plant	X00000010	WS CI SEPCO C PWB	Steam Generation Plant		13,267.25	13,753.07	9,525.26	1,018.55	11,054.05	11,054.05	1,054.05	1,054.05	23,202.14	73,802.07	20,245.82	23,351.60		196,622.98	
			X00000010	WS CI SEPCO C PWB	Steam Generation Plant		21.29	21.29	21.29	21.29	21.29	21.29	21.29	21.29	21.29	21.29	21.29	21.29	21.29	21.29	
A1 Production	A1 Production	Piney Glen Generating Plant	X00000010	WS CI SEPCO C PWB	Steam Generation Plant		6.26	12.83	8.69	28.82	23.96	13.54								92.88	
			X00000010	WS CI SEPCO C PWB	Steam Generation Plant		4.91	2,585.00	85,877.32	124,757.87	158,359.15	216,280.14	220,535.03	233,662.43	239,249.00	265,218.12	225,261.03	140,801.85	1,907,118.55	21,254	
A1 Production	A1 Production	Tuck Generating Plant	X00000010	WS CI SEPCO C PWB	Steam Generation Plant		51,622.53	40,617.58	177,471.79	142,545.88	147,105.63	18,392.05	353,231.34	58,878.18	58,865.52	20,275.31	20,387.66			8.49	
			X00000010	WS CI SEPCO C PWB	Steam Generation Plant		352,049,554.3	361,779,345.54	128,016,224.71	130,449.75	445,655.99	278,342.89	200,479.68	260,311.34	59,332.35	128,335.38	114,551.95	82,623.63	862,212,272.19	34,147.36	34.14
A1 Production	A1 Production	Arenas-Hu Generating Plant	X00000010	WS CI SEPCO C PWB	Steam Generation Plant		539,686,599.55	255,245,912.49	326,834,826.47	204,739,852.50	568,061.31	5,108	824,133.43	1,024,805.18	653,585.54	962,986.64	657,166.66	822,222.57	637,487.99	1,840,517,692.51	54.04
			X00000010	WS CI SEPCO C PWB	Steam Generation Plant		64.66	32.97	32,532.30	32,644.16	32,645.10	46.21	248.8							176.71	
A1 Production	A1 Production	Arenas-Hu Generating Plant	X00000010	WS CI SEPCO C PWB	Steam Generation Plant		29,557.07	30,846.12	32,532.30	32,644.16	32,645.10	52,425.11	32,445.10	32,445.10	51,583.78	95,028.37	100,466.25	261,154.00	765.02	9.9	
			X00000010	WS CI SEPCO C PWB	Steam Generation Plant		607.55	36	180,652.25	57,842.12	437,196.24	443,203.65	546,915.50	554,567.61							

Other	Pulley Generating Plant	Took Generating Plant	X0000224	SS-CI SEPCO G GEN PLT	General Plant																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																															
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Sum of amount		Month/Year													Grand Total
func. class	cc_environmental	12/1/2015	1/1/2016	2/1/2016	3/1/2016	4/1/2016	5/1/2016	6/1/2016	7/1/2016	8/1/2016	9/1/2016	10/1/2016	11/1/2016	12/1/2016	
General Plant	Other	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Intangible Plant	Other	60,353	67,108	-	247	783	1,351	2,139	2,396	3,048	4,393	6,414	11,585	18,393	178,550
Other Generation Plant	Other	400	495	657	856	1,088	1,340	1,691	1,799	2,079	2,654	3,452	5,481	7,523	29,524
Steam Generation Plant	Air Pollution	41,028,903	44,067,957	46,998,851	29,426,812	21,225,054	21,793,555	(29,831)	11,001	16,178	16,678	8,560	19,540	20,447	204,603,714
	Other	716,022	600,674	658,470	540,859	525,830	522,971	339,851	240,874	209,819	196,806	241,370	258,598	269,951	5,342,105
	Solid Waste Disposal	799,029	850,664	903,670	954,315	813,827	830,892	849,625	853,755	861,589	874,942	895,202	948,805	146,505	10,582,820
	Water Pollution	355,396	391,796	431,090	468,187	501,439	333,856	339,195	339,962	343,059	346,841	350,290	15,825	8,270	4,225,225
Transmission Plant - Electric	Other	53,015	69,158	1,993	2,748	4,888	9	-	-	-	1	160	827	3,715	136,514
Grand Total		43,013,116	46,047,853	48,994,732	31,394,034	23,072,908	23,484,033	1,502,670	1,449,787	1,435,782	1,442,316	1,505,448	1,260,961	494,814	225,098,454

Southwestern Electric Power Company
For the Year Ending December 31, 2016

2010 Totals

Air Pollution Control	20,067
Water Pollution Control	41,527
Other Pollution Control	15,697,787
TOTAL	15,759,382

2011 Totals

Air Pollution Control	129,576
Water Pollution Control	7,707
Other Pollution Control	1,041,050
TOTAL	1,178,333

2012 Totals

Air Pollution Control	131,975
Water Pollution Control	20,582
Other Pollution Control	243,572,513
TOTAL	243,725,070

2013 Totals

Air Pollution Control	632,451
Water Pollution Control	
Other Pollution Control	215,525
TOTAL	847,976

2014 Totals

Air Pollution Control	2,982,031
Water Pollution Control	
Other Pollution Control	1,496,268
TOTAL	4,478,299

2015 Totals

Pollution Control	2,870,534
Water Pollution Control	230,405
Solid Waste	17,438
Other Pollution Control	922,108
TOTAL	4,040,485

2016 Totals

Pollution Control	41,096,910
Water Pollution Control	556,872
Solid Waste	939,607
Other Pollution Control	11,392,628
TOTAL	53,986,018

ETEC / NTEC and NTEC

(balance of YTD starts in 2010)

<u>2010</u>	<u>2011</u>	<u>Average</u>
20,067	149,644	
41,527	49,234	
7,848,894	8,369,418	
7,910,488	8,568,296	8,239,392

<u>2011</u>	<u>2012</u>	<u>Average</u>
149,644	281,618	
49,234	69,817	
8,369,418	130,155,674	
8,568,296	130,507,109	69,537,703

<u>2012</u>	<u>2013</u>	<u>Average</u>
281,618	914,069	
69,817	69,817	
130,155,674	130,263,437	
130,507,109	131,247,323	130,877,216

<u>2013</u>	<u>2014</u>	<u>Average</u>
914,069	3,896,100	
69,817	69,817	
130,263,437	131,011,571	
131,247,323	134,977,488	133,112,405

<u>2014</u>	<u>2015</u>	<u>Average</u>
3,896,100	6,766,635	
69,817	300,221	
	17,438	
131,011,571	131,472,626	
134,977,489	138,556,920	136,767,204

<u>2015</u>	<u>2016</u>	<u>Average</u>
6,766,635	47,863,545	
300,221	857,094	
17,438	957,045	
131,472,626	137,168,940	
138,556,920	186,846,624	162,701,772

Southwestern Electric Power Company
For the Year Ending December 31, 2016

Historical AFUDC to be deducted from Plant in Service

2009 Totals

Air Pollution Control	22,082
Water Pollution Control	11,685
50% of Other	1,432,385
TOTAL	1,466,152

Minden and Prescott
(balance of YTD starts in 2009)

2010 Totals

Air Pollution Control	20,067
Water Pollution Control	41,527
50% of Other	15,697,787
TOTAL	15,759,382

2009	2010	Average
22,082	42,149	
11,685	53,213	
716,193	8,565,086	
749,960	8,660,448	4,705,204

2011 Totals

Air Pollution Control	129,576
Water Pollution Control	7,707
Other Pollution Control	1,041,050
TOTAL	1,178,333

2010	2011	Average
42,149	171,725	
53,213	60,920	
8,565,086	9,085,611	
8,660,448	9,318,256	8,989,352

2012 Totals

Air Pollution Control	131,975
Water Pollution Control	20,582
Other Pollution Control	287,235,922
TOTAL	287,388,480

2011	2012	Average
171,725	303,700	
60,920	81,502	
9,085,611	152,703,572	
9,318,256	153,088,774	81,203,515

2013 Totals

Air Pollution Control	632,451
Water Pollution Control	0
Other Pollution Control	215,525
TOTAL	847,976

2012	2013	Average
303,700	936,151	
81,502	81,502	
152,703,572	152,811,335	
153,088,774	153,828,988	153,458,881

2014 Totals

Air Pollution Control	2,982,031
Water Pollution Control	0
Other Pollution Control	1,496,268
TOTAL	4,478,299

2013	2014	Average
936,151	3,918,182	
81,502	81,502	
152,811,335	153,559,469	
153,828,988	157,559,153	155,694,071

2015 Totals

Pollution Control	2,870,534
Water Pollution Control	230,405
Solid Waste	17,438
Other Pollution Control	922,108
TOTAL	4,040,485

2014	2015	Average
3,918,182	6,788,716	
81,502	311,907	
153,559,469	17,438	
157,559,153	154,020,523	159,348,869

2016 Totals

Pollution Control	41,096,910
Water Pollution Control	556,872
Solid Waste	939,607
Other Pollution Control	11,392,628
TOTAL	53,986,018

2015	2016	Average
6,788,716	47,885,627	
311,907	868,779	
17,438	957,045	
154,020,523	159,716,837	185,283,436

SOUTHWESTERN ELECTRIC POWER COMPANY
13 Month Average Construction Work in Progress (CWIP)
For the Estimated Year Ending December 31, 2017

<u>Month</u>	Production CWIP		
	Pollution Control	Other	Total
Dec-16	4,636,296	21,924,148	26,560,444
Jan-17	5,164,605	9,866,384	15,030,990
Feb-17	5,665,309	8,759,454	14,424,762
Mar-17	5,851,007	10,593,085	16,444,092
Apr-17	6,277,278	13,006,636	19,283,914
May-17	6,702,760	16,262,481	22,965,241
Jun-17	7,207,003	17,696,553	24,903,556
Jul-17	7,613,243	25,151,094	32,764,337
Aug-17	8,252,770	20,882,700	29,135,470
Sep-17	8,859,061	14,755,419	23,614,480
Oct-17	9,544,894	19,484,763	29,029,656
Nov-17	10,206,058	19,591,820	29,797,877
Dec-17	10,770,682	20,449,002	31,219,684
Total	96,750,965	218,423,538	315,174,503
13 Month Avg	7,442,382	16,801,811	24,244,193

<u>Month</u>	Production CWIP AFUDC		
	Pollution Control	Other	Total
Dec-16	984,170	276,791	1,260,961
Jan-17	159,260	137,240	296,500
Feb-17	187,183	144,182	331,365
Mar-17	206,881	170,372	377,253
Apr-17	230,401	194,506	424,906
May-17	251,782	215,617	467,399
Jun-17	268,623	225,879	494,502
Jul-17	285,604	247,813	533,418
Aug-17	316,850	304,476	621,326
Sep-17	357,283	222,155	579,439
Oct-17	405,425	294,913	700,338
Nov-17	457,927	348,673	806,600
Dec-17	506,881	416,627	923,508
Total	4,618,269	3,199,244	7,817,513
13 Month Avg	355,251	246,096	601,347
13 Month Avg (50%)		123,048	

Month	Production CWIP Net		
	Pollution Control	Other	Total
Dec-16	3,652,126	21,647,357	25,299,483
Jan-17	5,005,345	9,729,145	14,734,490
Feb-17	5,478,126	8,615,271	14,093,398
Mar-17	5,644,126	10,422,713	16,066,839
Apr-17	6,046,877	12,812,130	18,859,007
May-17	6,450,978	16,046,864	22,497,842
Jun-17	6,938,380	17,470,674	24,409,054
Jul-17	7,327,639	24,903,281	32,230,920
Aug-17	7,935,920	20,578,224	28,514,144
Sep-17	8,501,777	14,533,264	23,035,041
Oct-17	9,139,469	19,189,849	28,329,318
Nov-17	9,748,131	19,243,146	28,991,278
Dec-17	10,263,801	20,032,375	30,296,176
Total	92,132,696	215,224,294	307,356,990
13 Month Avg	7,087,130	16,555,715	23,642,845
13 Month Avg (50%)		8,277,858	