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SOAH DOCKET NO. 473-18-4038
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PUBLIC UTILITY COMMISSION
CLERK

Application of AEP Texas Inc. to Adjust Energy Efficiency Cost Recovery Factors and Related Relief

AFFIDAVIT OF REGINALD TUVILLA

THE STATE OF TEXAS §
§
COUNTY OF TRAVIS §

ON THIS DAY, before me, the undersigned authority, personally appeared Reginald Tuvilla who on his oath stated as follows:

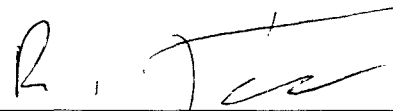
1. My name is Reginald Tuvilla. I am employed as a Utility Analyst in the Infrastructure & Reliability Division of the Public Utility Commission of Texas (Commission).
2. I am at least 21 years of age, fully competent and authorized to make the statements herein. Additionally, I have personal knowledge of the facts stated herein, and they are true and correct to the best of my knowledge.
3. On June 1, 2018, AEP Texas Inc. (AEP or Company) filed an Application for Authority to Adjust its Energy Efficiency Cost Recovery Factors and Related Relief (EECRF) pursuant to PURA¹ § 39.905 and 16 Texas Administrative Code (TAC) § 25.181.
4. In its amended Application, filed on June 29, 2018, AEP requested an EECRF in 2019 of \$11,771,331 (\$9,295,731 for the Central Division and \$2,475,600 for the North Division). This request was revised by stipulation as described below.
5. By stipulation filed on August 10, 2018, AEP agreed to revise its requested 2019 EECRF to \$11,407,222 (\$8,972,430 for the Central Division and \$2,434,792 for the North Division). This amount is comprised of the following: \$8,974,699 of project year 2019 energy efficiency program expenditures in excess of the projected energy efficiency revenues collected from base rates adjusted as outlined in the rule; a performance bonus of \$2,900,989 for exceeding the 2017 demand and energy goals at a cost that did not exceed the cost caps; an over-recovery balance of \$692,545; \$12,091

¹ Public Utility Regulatory Act, Tex. Util Code Ann. §§ 11 001-58.302 (West 2016 & Supp. 2017), §§ 59.001-66.016 (West 2007 & Supp. 2017) (PURA).

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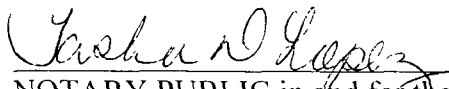
for 2017 EECRF proceedings incurred in Docket No. 47236; and a projected evaluation, measurement, and verification costs of \$211,988.

6. My review included an examination of the reasonableness of AEP's forecasted 2019 energy efficiency expenses; verification that AEP's requested demand and energy goals for the 2018 program year complied with 16 TAC § 25.181(e) and that AEP's proposed line loss is reasonable; review of AEP's requested performance bonus for the 2017 program year to verify compliance with 16 TAC § 25.181(h); and a review of AEP's energy efficiency expenses recovered in the 2017 program year to verify that they were reasonable and necessary to reduce demand and energy growth.
7. Based upon my review of AEP's Application, accompanying work papers, and Stipulation and Settlement and Agreement, I have determined that AEP's total requested energy efficiency expenses for the 2019 program year, which are below the cost caps pursuant to 16 TAC § 25.181(f)(7), are reasonable. The company's demand and energy goals for the 2019 program year comply with 16 TAC § 25.181(e) and the proposed line loss is reasonable; the Company's requested performance bonus for program year 2017 was calculated in accordance with 16 TAC § 25.181(h); the proposed administrative costs are reasonable and fall below the caps set in 16 TAC § 25.181(i); AEP's 2019 hard-to-reach program is designed to achieve savings no less than 5% of the Company's total demand reduction goal pursuant to 16 TAC § 25.181(e)(3)(F); and AEP's 2017 program costs were reasonable and necessary to achieve demand and energy savings.
8. Based upon my review of the Stipulation and Settlement Agreement, as described above, I conclude that the Stipulation and Settlement Agreement is reasonable and meets the requirements of 16 TAC § 25.181.



Reginald Tuvilla
Utility Analyst
Infrastructure & Reliability Division
Public Utility Commission of Texas

SUBSCRIBED AND SWORN TO before me, on this the 10th day of August, 2018.


NOTARY PUBLIC in and for the State of Texas.

