

**DMJ Work Type** - Distribution Major Storm, Any tree work requested to restore power during sever weather determined by AEP as being a major storm.

**DWO Work Type** - Distribution Work Order. Any necessary tree work requested by an AEP engineering or support group in order for other AEP work to be completed. This type work is billed to the requesting work group and requires a specific work order number before tree work can begin.

**DMC Work Type** - Distribution Maintenance. Tree work designated by AEP Texas Forestry to be conducted on identified circuits to clear easements and rights of ways. If a particular circuit has several DQS locations DMC work should be strongly considered rather than several DQS locations. All DMC work shall be added to the annual circuit plan and completed miles recorded.

**Danger Tree**: A tree considered a potential hazard to AEP's facilities growing outside of the normally cleared right-of-way.

**Debris**: Non-vegetative material (trash) such as pop bottles, cans, wire, paper and old tires.

**Fallen Tree**: A tree lying on the ground not cut by the Contractor.

**Hangers**: A limb or limbs cut by contractor that is left hanging in tree, on lines or fence.

**Hazard Tree**: A tree considered a potential threat to the safety and reliability of AEP's facilities growing within the normally maintained right-of-way.

**Log**: The merchantable portion of a tree as designated by AEP.

**Lopping**: The cutting of limbs and slash so that they lie in contact with the ground or as otherwise designated by AEP.

**Mowing**: The mechanical cutting of woody stem vegetation within the right-of-way.

**Prescription**: The plan prepared for each circuit or unit of work. It designates the vegetation to be maintained, the method(s) of maintenance, and who will perform the work.

**Property Owner**: Party from whom easements have been secured, their successors or assigns.

**Removal**: The complete cutting down of trees at or near the ground line. AEP shall specify the disposal method. Each tree removed, 4" or larger, is 1 removal unit. For brush cut 500 sqft is 1 removal unit.

**Rolled Back**: The reduction of a pruned tree's crown in a manner that provides increased conductor clearance by pruning to shape the upper crown area away from the conductors.

**Slash**: The un-merchantable portion of a tree as designated by AEP.

**TGR**: Tree Growth Regulator – a chemical applied to the soil at the base of a tree to slow the growth of branches. Typically applied before trimming to reduce re-growth.

**Tree**: Woody stemmed vegetation with a DBH four inches (4") or greater.

**Tree Density**: Light –35 trees or less per mile, or 0-25% of line section requires clearing.  
Medium – Between 36 and 70 trees per mile, or 26-50% of line section requires clearing.

Heavy – Between 71 and 140 trees per mile, or 51-75% of line section requires clearing.  
 Very Heavy – Greater than 140 trees per mile, or 76-100% of line section requires clearing.

## I. General Guidelines

### A. Safety

1. The safety of both contractors and the public is of utmost importance to AEP Texas. Contractors shall regard safety as their first priority. Contractors and their employees will recognize and follow all laws, rules and regulations regarding public and worker safety. **Any personal injury accidents** that occur on the job **must be reported to an AEP System Forestry representative as soon as possible.**
2. Safety audits will be conducted on a regular basis. In appendix table 2 (pg 18) is a copy of the audit form.

### B. Personnel

1. If required by state or local laws and regulations the contractor shall have an ISA Certified Arborist available.
2. No private work may be solicited or worked by Contractor employees while on AEP time. Contractors shall not receive compensation from anyone except AEP for tree work that is a part of AEP's System Forestry program. The consequences will be crew and/or contractor disciplinary action.

### C. Equipment

1. Contractors shall provide **sufficient equipment in working order** to complete assigned tasks such as trucks, chippers, chain saws, pole pruners, hand saws, ropes, saddles, etc. Specialty equipment not regularly used in day to day operations can be billed to AEP with approval.
2. The minimum number of chain saws on the job shall equal the number of personnel on the crew, or as per contract agreement. Chainsaws shall not be billed separately unless approved by AEP.
3. Each climber shall be provided with a complete set of equipment including: rope, saddle, chainsaw, pruner and handsaw.
4. The use of spurs/climbers is to be avoided. Where their use is required (as in the removal of specified trees or climbing difficult trees) only qualified persons shall be permitted to use them upon approval by an AEP representative.

### D. Outages

1. **All outages or operations caused by contract crews shall be reported to the appropriate AEP Dispatch center and AEP Texas Forestry representative immediately. Any line contact on transmission shall be reported to the appropriate dispatch center and AEP Texas Forestry immediately.**
2. Use the following dispatch numbers to phone in crew caused outages:  
 Abilene & San Angelo – (800) 756-7332;  
 Corpus North – (800) 727-3635;  
 Corpus South – (800) 714-9312;

Laredo – (800) 241-4189;

San Benito – (800) 568-5214

3. Costs to restore contractor caused outages due to negligence may be billed to Contractor as determined by AEP.

#### **E. Working Hours (Drive time, Overtime, etc.)**

1. **Drive time** in the morning and evenings, chip dumping times and any other non productive time **must be discussed** with AEP Forestry representative **before work** on assigned tasks **begin**.
2. **Overtime** is billable for work performed outside the scope of the normal work schedule. The **preferred work week** is Monday through Thursday if working 4x10 or Monday through Friday if working 5x8. **Work planners are encouraged to adjust hours in order to catch people at home.**
3. A **make up day** should only be used in the event crews are shut down due to inclement weather or AEP approved training. In no event should one crew be allowed a make up day due to personal reasons without prior AEP approval.
4. Breaks shall be taken as needed during the daily routine. Breaks should not last any longer than 10 minutes. Workers should not take breaks together.

#### **F. Work Procedures**

1. The contractor will be responsible for developing a written work plan for each work assignment. Each work plan should include: Circuit name and number, Job Authorization number if work is unit price, A time line of when work is to be started and expected completion, Type of equipment and man power to be used, and a list of any suspected issues or concerns that may be encountered while working on the circuit. The plan must be submitted to the appropriate AEP representative for approval before work begins.
2. The **work plan must be performed in a systematic way**. It is recommended to break large projects into smaller, more manageable work steps in order to facilitate thorough completion and inspection. A typical work step is usually 1 mile or less. The preferred method is to work all "Zone One" areas first to insure quick reliability impact for AEP. For example: Begin work at substations and following circuit to protective devices. Complete work in one step before moving to another. **Skipping around to complete easiest work first is not acceptable.** Care must be taken to follow entire circuit. Circuit maps will be provided were available. Contractor should work what is indicated on the map as the circuit. Please report any portions of a circuit that are found in the field that are not on the map.
3. It is the Contractor's responsibility to ensure that the work plan is followed. It is important to regularly communicate with AEP representative about work progress, if work is staying on track with time estimates given in the work plan.
4. **Contractor shall provide daily work locations to AEP**, including changes to these locations. The **locations must be as accurate as possible** to insure safety.
5. Each crew shall have a planned worksheet present at all times, except in the case of emergency work.

6. The Contractor's daily association with their crews and customers will allow planned **outages and refusals to be worked on a progressive basis. Contractor shall provide a written list of such areas that have not been worked**, including reasons, to their AEP representative within a reasonable time (within 24 hours of when work was determined hazardous or refused). See Refusals section H.
7. The Contractor will notify AEP of any hazardous conditions found during the performance of work under this contract. This is to include danger trees, soil erosion, or any attachment to AEP's facilities, deteriorated, damaged or broken facilities and any other abnormal conditions.
8. AEP Texas designated personnel will conduct clearance and work quality audits of contractor's work on a regular basis. See Appendix table 2 (pg 18) for audit document. **When an assigned task (circuit) is nearing completion the contractor must notify their AEP representative** to establish a written schedule, with dates, **for final inspection**. Inspection should be started **within two weeks of completion**. If schedule is not established AEP representative should notify contractor and can begin final inspection two weeks after next circuit is started by contractor's crews. AEP representative can schedule the inspection with a contractor representative if desired. Customer refusal addresses should be documented in written inspection schedule with time line of expected completion. AEP representative has 30 days to complete final inspection. Upon inspection **undocumented skips or incomplete work will be worked at the Contractor's expense**. If AEP representative fails to inspect circuit until after the established 30 day inspection date the cost of working any skips found will be negotiated. In appendix table 3 (pg 19) is an example of a circuit completion document.
9. All requested Non Maintenance tree work, whether **DHS, DQS or DWO**, is to be first inspected for necessity by an AEP Texas Forestry designated representative. Work prescriptions must be determined by following work type specifications, as explained in the definitions section (pages 3,4), to determine appropriate work type. Periodic AEP inspections of completed work will be conducted to verify accuracy of work type determination as well as adherence to clearance and work quality guidelines.

## G. Public Relations

1. Public relations are important to AEP. Proper notification can eliminate most property owner issues before they arise. Advanced notification provides the property owner with an opportunity to voice concerns. Properly communicating the extent of work to be completed is a must.
2. An attempt will be made by contractor to contact property owners through personal notification and or door hangers. Once property owners are contacted **every effort must be made to communicate the extent of tree work to be performed** on their property. Do not assume they understand what you are talking about – show them. Explain the clearances. Time spent here can prevent future complaints and claims. AEP can assist with news releases, certified letters, etc. if determined these avenues are needed. AEP will attempt to contact an absentee landowner only if the resident provides AEP with a method to contact the property owner.
3. During normal, day to day, operations the Contractor will knock on each property owner's door announcing the arrival of the crew for work.

4. At no time while working on AEP assigned tasks should Contractor's employees use property or possessions of land owners without owners consent. Such as using picnic tables, patio chairs, lawn furniture, etc. during lunch break.
5. During emergency work, Contractor will make an attempt to notify the property owner of the crew's arrival. Discretion should be used during late night or early morning work. If no property owner contact is made, a door card should be left to explain work performed.
6. Contractor will document all locations where door cards were left, including address and date. A monitored local or toll-free telephone number to reach the contractors should be on each card. In the event a property owner complaint or claim results from lack of notification and the contractor can not produce documents to verify notification the contractor will resolve claim at their expense.
7. Customer notification must be conducted prior to any DHS, DQS or DWO work starting. Strict enforcement of items 2 and 4 above are to be followed while conducting DHS or DQS work.

## H. Refusals

1. **A "Refusal" is considered to be any resident or property owner refusing to allow or permit the contractor to clear vegetation as specified within the scope of, and according to, these guidelines and specifications.**
2. **Refusals will not be accepted** by AEP unless both work planner and GF have verbally spoken with property owner and have documented reasons for refusal. Documentation may include property owners signature but must include planners and GF signature verifying they have done all they can to resolve issues.
3. The contractor will document a refusal/complaint on work plan with pertinent property owner information such as phone number and best time to catch at home.
4. If the contractor is unable to resolve the refusal within one week of working on circuit, the refusal shall be turned over to their AEP representative.
5. Undocumented refusals will be worked at the Contractor's expense. See section I.H.8, pg 7.
6. All refusals will be communicated and signed off by AEP representative.

## I. Damage Claims and Complaints

1. The Contractor shall be responsible for all damage claims and complaints due to their negligence. AEP shall be notified within one business day of all claims and complaints. For cases involving livestock or domestic animals, AEP may choose to have a veterinarian investigate the situation.
2. An on-site investigation with the resident or property owner shall be made as soon as possible. This meeting, or telephone arrangements for the investigation, shall be made within twenty-four (24) hours of receipt of the complaint. AEP's representative may accompany the Contractor during this initial investigation.

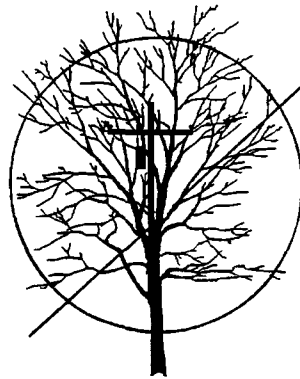
3. All valid claims resulting from the Contractor's negligence are to be settled within thirty (30) days by the Contractor, or the Contractor will provide evidence they are trying to reach a reasonable settlement.
4. The Contractor shall keep AEP informed of the status of all complaints. When a settlement is reached, a written release for both AEP and the Contractor shall be obtained from the property owner.
5. If a settlement cannot be reached, the Contractor will confirm in writing to AEP the final settlement offer and briefly summarize events pertaining to the offer.
6. After thirty (30) days, if a Contractor fails to resolve a claim, does not continue attempts to resolve the claim or keep AEP fully informed, AEP may settle the claim and bill the Contractor.

## II. Clearance & Work Quality Guidelines

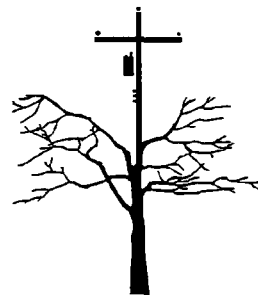
### A. Removals

- *AEP Tree Removal Philosophy: Tree removal is a very important part of AEP's line clearance program.* In residential areas, authorization of the property owner (in writing), AEP System Forestry, or appropriate government agency is required for the removal of a tree.
- All trees removed outside the easement should be counted as capital (DBX,TBX).
- Stumps should be cut as close to the ground as possible (where safety is not a question no more than three inch maximum height is acceptable) and treated with an approved herbicide, unless designated otherwise by AEP.
- Tree removal shall be completed in one operation. If this is not practical, hazardous conditions shall not be left while the work is not actively in progress. Trees shall be removed in a manner to protect yards, fences, houses, electric lines and other facilities.
- **Targets for saw crew removal are:**
  - Fast regrowth trees near NON HARDWARE POLES less than 14" (4-13.9") and are closer than 10 feet to power lines, or medium and slow re-growth closer than 6ft to power lines. Also, fast regrowth trees near HARDWARE POLES less than 15" (4-14.9"), or medium and slow trees closer than 6ft to power lines. (Refer to species list, table 1, pg 17 and the Tree Work Selection Diagram, table 2, pg18).
  - Any tree or brush closer than 5ft from open wire secondary.
  - Any tree or brush closer than 5ft around a utility pole with electrical hardware such as transformers, fuses, etc. Clear around pole for distance of 5ft. See definition for brush (page 3).
  - On Distribution at AEP Texas a size limit for removals is set at 13.9 inches in diameter and smaller (trees 14" or larger should be trimmed). Consult with AEP before removing larger trees.
  - Trees where adequate clearance cannot be obtained using proper pruning practices.
  - Mature trees where more than 50% of the crown must be removed to obtain clearance.
  - Palms where trunk is closer than ½ of the crown diameter to the conductor.

- **Trees that are Not Good Candidates for saw crew removal are:**
  - Trees in landscaped areas where property owners refuse removal.
  - Brush that does not follow the Tree Work Selection diagram pg 18, or is not around a pole with electrical hardware.
  - Trees 14" or larger without valid reason approved by AEP.
  - Trees that would take more than 2.5 times longer to remove than to trim for proper clearance and at least 50% of the crown would be left intact.
  - Slow-growing tree species farther than 6ft from the primary.
  - Small trees around non hardware poles where herbicide can be applied to control.



Tall Maturing/Fast Growing



Short Maturing/Slow Growing

- Deciduous stumps will be treated with an AEP approved herbicide to prevent regrowth unless the situation prevents application according to label instructions, there is a documented customer refusal or an AEP representative directs otherwise.
- Diseased, dying, or dead trees which could threaten conductors will be made safe allowing for removal by the customer or private arborist. All brush and wood generated by this activity should be left on site unless specified by AEP.

**Remember - Removal of any trees in the easement larger than 18" @, the stump, or any brush or trees outside the easement should be counted as Capital (DBX).**

## B. Pruning

### 1. AEP Pruning Standards and Philosophy

All tree pruning shall be governed by approved principles of modern arboriculture and shall adhere to Tree Care Industry Association (TCIA) and International Society of Arboriculture (ISA) standards. AEP System Forestry personnel may grant exceptions to these pruning standards where mechanical trimming equipment is used such as bomb trimmers and aerial saws. Pruning shall be done in a manner that protects current tree health and with regard for future growth and development. Pruning shall provide at least the minimum specified clearance from electrical conductors as set forth in this Section.

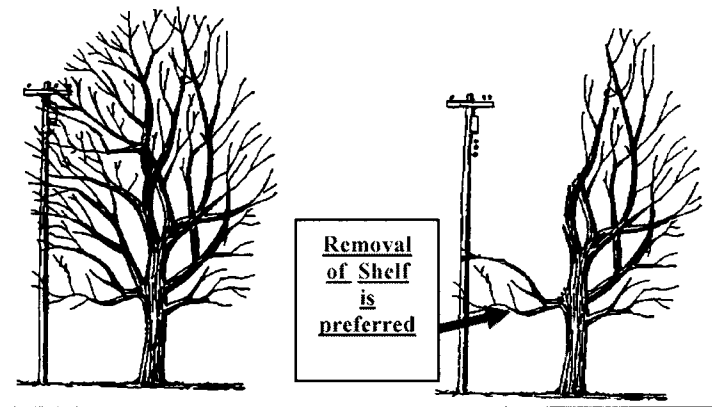
The process used to determine which trees to be trimmed should follow the Tree Work Selection Diagrams pg18, table 2.

Care shall be exercised to prevent the spreading of insects or diseases from one tree to another. Contractors trimming oak trees in the state of Texas will follow proper Oak Wilt prevention steps as directed by AEP Texas.

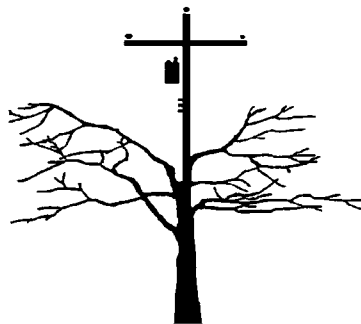
Wild cherry, black walnut and other toxic vegetation which has been cut or damaged, shall be removed from areas accessible to livestock as appropriate.

## 2. Directional Pruning

It is AEP's practice to prune trees in a manner that will direct growth away from electrical conductors, thus reducing the amount of pruning necessary in the future. Trees growing to the side of conductors should have their horizontal growth removed back to a lateral or the parent stem and the vertical growth left rolled back. AEP would prefer to have the shelf removed.



Trees closer than the 10ft or 6ft specified on page 18 should be pruned using the "natural" or "drop crotch" method of top pruning. In sensitive customer areas Vertical growth should be removed and horizontal growth (Shelf) can be left.

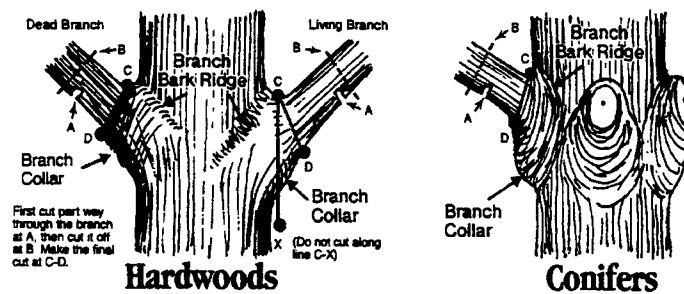


Note: Trees left in this condition near a pole with hardware are good candidates for removals. If trees are trimmed they should be TGR'd.

## 3. Collar Cuts

The position and manner of making cuts is of the utmost importance. The most important single item in tree pruning is the "collar cut" (see diagram below).





When properly made, collar cuts reduce the pruning wound surface area (compared to flush cuts) and allow the tree's chemical protective zones to aid in callus growth and eventual wound coverage. Collar cuts also reduce re-sprouting and re-growth of limbs into conductors.

- a. All limbs will be cut back to laterals at least one-third (1/3) the size of the limb being removed.
- b. Care shall be taken to avoid damage to the cambium layer, or loosening or stripping of the bark.
- c. The three (3) cut method to remove large limbs will be used to eliminate bark peels.
- d. Improper collar cuts and peels will be looked for during work quality audits.
- e. Make sure all cuts 3" and larger on all Oak trees are painted to help prevent Oak Wilt.
- f. On trees along streets or in sensitive customer areas, all cuts larger than 3" should be painted on all tree species.

#### 4. Tree Shape

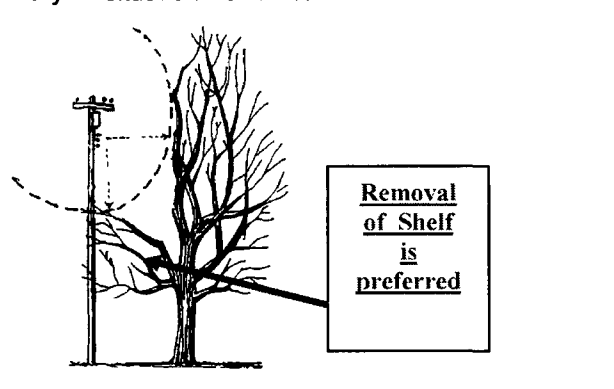
- a. Trees should be **pruned to provide the required clearance** from electrical conductors. After that job is accomplished, the shape of the tree can be taken into consideration.
- b. When poorly shaped trees must be left, Contractor is empowered to do cosmetic pruning to satisfy the customer, using approved methods within a period of time that does not exceed the time spent on the original line clearance pruning. Rounding over is *not* an approved practice.

#### 5. Clearance - Distribution

**Minimum clearance for distribution system lines is that distance that will prevent regrowth into conductors for a minimum of 3 years.** The species, site conditions, limb and conductor sag and sway during windy conditions and the effect of electrical load should all be considered when determining the clearance requirement. Insufficient species clearance will be looked for during clearance audits. Tree species and clearances are listed on pg 17, table 1.

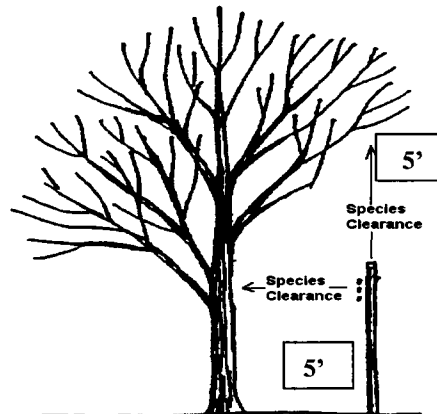
**Primary** – Trees should be trimmed for a **minimum** of 3 years clearance. Overhanging limbs should be removed. Top of tree should be rolled back unless

prior arrangements have been made with AEP. AEP may adjust overhang clearance on Single phase primary as situation warrants.



**Reduced clearance** can be considered on trees that have had a recent TGR application. See pg 17, table 1.

**Open Wire Secondary** – Trees that are closer than 5ft to the wires should be trimmed for at least 5ft feet of clearance. Do not remove overhanging branches unless otherwise specified by AEP.



**Twisted or Cabled Secondary, Service Drops & Street Lights** – Trees near twisted or cabled secondary service drops and street light wires will not be pruned unless limbs are applying pressure to the line. Do not prune for street light illumination except under the specific direction by AEP.

**Poles – Poles with hardware (transformers, reclosures, etc.) will be cleared** of all volunteer trees, brush, and slash to obtain a minimum of a **five (5) foot radius** of clearance **around the pole**. Poles without hardware can be cleared around using herbicide. All Poles that do not have this clearance as explained must be documented with reason as a documented skip otherwise contractor will work at their expense. (see section I.F.8.)

**Guy Wires – Guy Wires supporting poles with hardware must be cleared** the same as a pole with hardware. Down guys and Overhead Guy wires on non hardware poles should only be pruned of heavy limbs applying pressure on the wires. Herbicide can be used to spray brush around non hardware down guys.

**Vines** - Should be cut and treated with an herbicide to prevent re-growth. Do not try to remove by pulling off pole. Cut a visible gap between the stumps and hanging vine.

## 6. Clearance - Transmission

Minimum clearance from transmission conductors should be species clearance plus a climber safety zone of OSHA required "separation" for various transmission voltages and is based on maximum sag of conductors.

## 7. Hangers and Clean Up

- a. All hangers shall be removed from the tree before leaving the job site.
- b. Work sites shall be left in a neat and orderly condition. If a customer complaint arises due to incomplete clean up and upon investigation determine was **contractor's negligence** resolution will be at **contractor's expense**.
- c. A minimum amount of clean up work should be performed when performing a property owner generated request for tree removal. Unless otherwise designated by AEP, wood shall not be cut up or hauled away. Where designated by AEP, chipping the brush, cutting wood into lengths that can be handled and raking the site is the maximum clean up that should be performed.
- d. All streams and/or drainage ditches shall be kept open while working in the area and shall be cleaned out after Contractor's operation is completed in the area.

## C. Clearing and reclearing

- a. AEP will provide the width of the right-of-way to be cleared.
- b. All woody plants that have the potential to grow into the lines should be controlled, either by mechanical removal, herbicide treatment or a combination of both. Those woody plants within the right-of-way that at mature size normally would not threaten lines or interfere with access to AEP's facilities should be left undisturbed in the right-of-way whenever possible.
- c. Trees, brush, and existing **stumps** within the right-of-way shall be cut as close to the ground as safely practical. The preferred standard is **not to exceed three inches in height** above the ground line. Where possible, the cut shall be parallel to the slope and promptly treated with an approved herbicide, unless otherwise directed by AEP.
- d. Trees shall be felled to avoid damage to crops, fences and other facilities. Any trees felled into crops, ditches, streams, roads or across fences shall be promptly removed. No trees shall be felled in such a manner as to endanger AEP's facilities or the property of third parties, or hinder access along the right-of-way.
- e. Trees, brush and slash shall be lopped as designated by AEP.
- f. Danger trees shall be removed or pruned to eliminate the hazard. When cut, danger trees shall be cut as low as practicable, but not to exceed eight inches in height above the ground line. The logs and slash shall be left as felled, unless otherwise designated by AEP. **Danger trees are typically outside the easement. Working these trees should be counted as Capital (DBX).**

- g. Stumps of trees growing in fences may be cut at fence post height, where designated by AEP.
- h. Logs may be left in tree lengths or as designated by AEP. The merchantable value of logs shall be preserved as much as possible.
- i. In remote areas, brush and logs may be piled at the edge of the ROW for wildlife habitat. Logs may be left in large sections rather than cut to firewood length.
- j. Brush should not be left in managed agricultural areas or other maintained areas unless designated by AEP.

#### **D. Herbicide Applications**

- 1. Tree and brush species in the designated easement or ROW that have the potential of growing into the lines, should be controlled. Tree and brush species that will not grow up into the lines or interfere with access to AEP's facilities should be left untreated whenever possible. Appropriate use of herbicides will be looked for during the ROW clearance audit. **Urban spray height - (in residential & retail business areas) DO NOT spray brush over 10' tall. Any brush skipped must be documented and reported to AEP.**

**All first time herbicide application used to remove trees / brush to widen designated easement must be counted as capital (DBX).**

- 2. All herbicides shall be applied according to label instructions.
- 3. *Herbicide application shall be done in accordance with Federal, State and local laws.* Contractors are required to maintain accurate and up to date records of all herbicide applications and are required to abide by all Federal, State, and Local laws concerning licensing, record keeping and product handling.
- 4. Contractors shall attain 100% coverage and 95% control of treated vegetation. Results from application not meeting 95% control will be re-worked at contractor's expense.
- 5. AEP System Forestry will make vegetation management prescriptions in consultation with contractors.
- 6. Whenever possible landowners should be notified before any herbicide treatments occur. There are several acceptable methods of notification such as personal contact, letter, or door hanger.
- 7. Managers of public rights-of-way involved in the treatment area shall be notified, where appropriate.
- 8. Contractor shall be responsible for training of herbicide applicators.
- 9. Unless specifically prohibited, by property owners or AEP, cut stumps will be treated with an approved herbicide treatment.

#### E. Tree Growth Regulator Application

1. Trees designated for tree growth regulation shall be treated with an approved tree growth regulator (TGR) in accordance with label instructions.
2. **All first (1<sup>st</sup>) time TGR application of trees inside or outside the easement must be counted as capital (DBX).**
3. Follow Tree Work Selection Diagrams pg18 to determine which trees should have TGR application. The diagrams show two possible work situations – TGR & Trim or TGR Only.
4. All trees shall be inspected by the Contractor for health and vigor prior to treatment. Trees found in an excessive state of decline shall not be treated unless directed by AEP.
5. Special care must be taken when making a TGR application near off target plants (trees, shrubs, vines, flowers, grass, gardens, etc.). Basal drench may be used rather than soil injection to restrict off target impact.
6. Landowners should be notified before any TGR treatments occur. There are several acceptable methods of notification such as personal contact, letter, or door hanger. Two attempts of different methods are to be used before application in sensitive landowner areas.
7. Proper documentation and record keeping is required. Copies of such records should be available upon request by AEP. Application refusals must be documented and reported to AEP as work progresses on a given circuit.

## APPENDIX

<b>Table 1.      Tree Species &amp; Clearances for <u>AEP Texas</u> (TCC &amp; TNC)</b>
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These growth rates and clearance distances are a guideline for the minimum clearances required for three years of clearance from the conductors. These distances are not static and should serve as ***minimum clearance*** requirements on the distribution system. The minimum clearance requirements on the transmission system are these distances plus an additional seven foot climber safety zone. **Trees with recent TGR application can be considered for less clearance. The fast species can be considered medium and the medium can be considered slow. Eight feet should be the minimum for any reason.**

### Species Re-Growth Rates & Minimum Clearances

#### ***Species with Fast Re-growth***

Trim for a minimum clearance of **15 feet** from conductors.

Anaqua	Ash species
Australian pine	Chinaberry
Cottonwood (Poplar species)	Eucalyptus
Golden Rain Tree	Hackberry
Mulberry	Pecan
Salt Cedar	Sycamore
Tallow	Tepejahe
Western Soapberry	Willow

#### ***Species with Medium Re-growth***

Trim for a minimum clearance of **12 feet** from conductors

Cypress	Elm species
Ficus	Fruit trees (Oranges, etc.)
Huisache	Young vigorous Live Oak species
Locust	Young vigorous Mesquite
Ornamental Pear	Red Oak species (leaves w/ pointed lobes)

#### ***Species with Slow Re-growth***

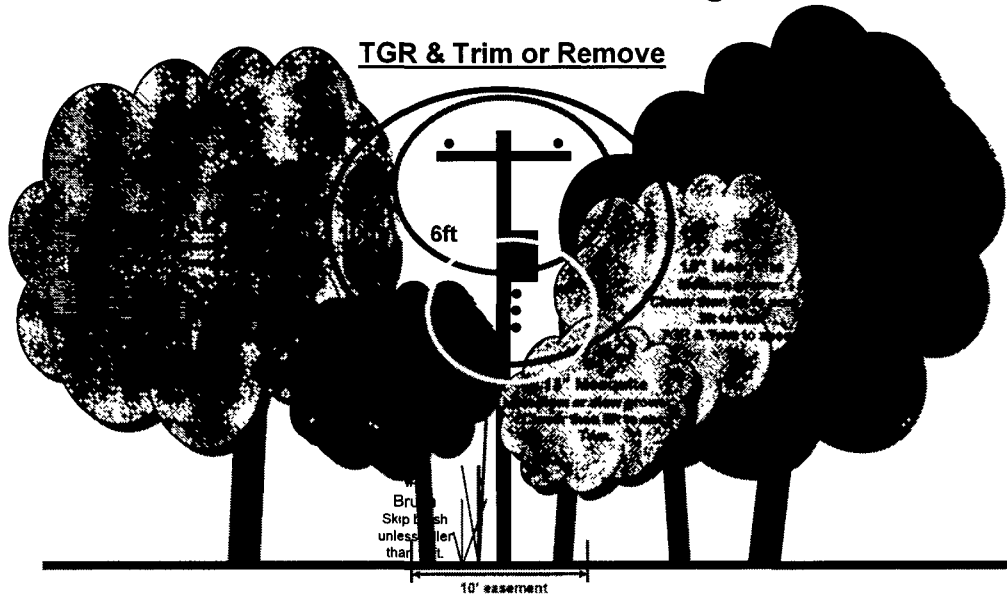
Trim for a minimum clearance of **8 feet** from conductors

Avocado	Ebony
Magnolia species	Orchid species
Pine species	Older mature Live Oaks
Retama	Older mature Mesquite
Red Cedar (juniper)	Royal Poiciana
Small ornamental species (redbud, dogwood, crabapple, crepe myrtle, ligustrum, etc.)	
White Oak species (leaves with rounded lobes)	

*The species and the site, limb and conductor sag, and sway during windy conditions and times of heavy electrical load should all be considered when determining clearance requirement.*

**Table 2. Tree Work Selection Diagram.**

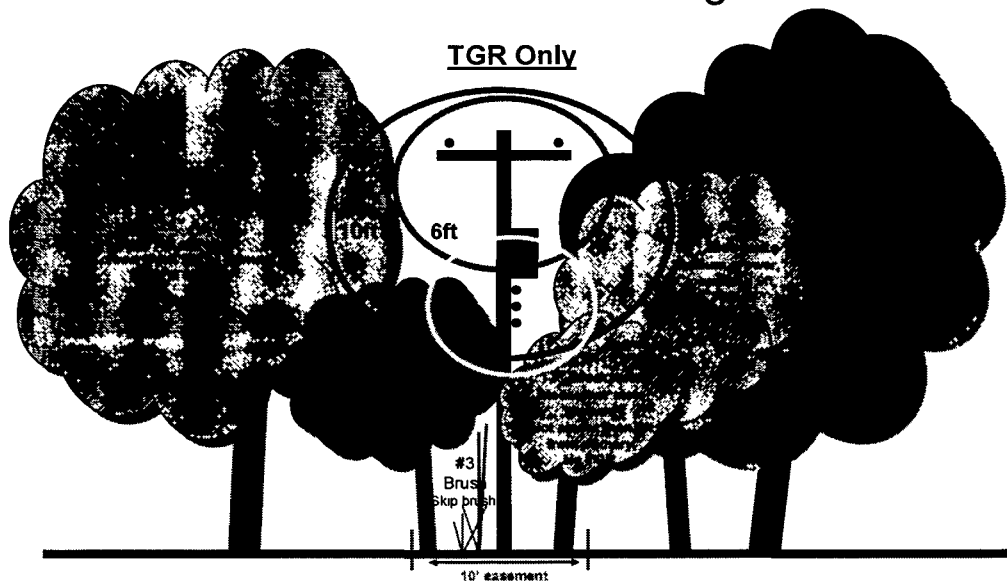
## Tree Work Selection Diagram



#1- TGR & Trim to specs, #2- No TGR-Remove tree, #3- Skip brush unless at a pole with hardware or closer than 5ft to Sec, #4- Trim for Sec, #5- TGR & Trim to specs, #6-Large, Older Slow species-Skip & Contact forester.

Notes: If #3 were brush at hardware pole it would be target for removal, if #5 were less than 14' it would be target for removal.

## Tree Work Selection Diagram



#1-TGR, #2-TGR, #3-Skip brush, #4-No TGR, #5-TGR, #6-Large, Old Slow species-Skip & Contact forester.

**Table 3. Example of Written Circuit Completion Document**

## AEP Texas Forestry Operations

### Completed Circuit Inspection Schedule

Circuit Name & Location: \_\_\_\_\_

\* Expected Date for Inspection to Begin: \_\_\_\_\_

Date the Initial Inspection is Completed: \_\_\_\_\_

Date Final Inspection is Completed: \_\_\_\_\_

Upon completion of Initial Circuit Inspection list below issues discovered during inspection that need correction in order for circuit to pass Final Inspection.

Check box to the left when listed item is re-inspected and accepted as complete.

<input type="checkbox"/>	_____
<input type="checkbox"/>	_____
<input type="checkbox"/>	_____
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<input type="checkbox"/>	_____

Comments: \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

\_\_\_\_\_  
signature of inspecting AEP Texas representative

\_\_\_\_\_  
signature of Contractor representative

\* Note - See page 6 of the AEP Texas Forestry Guidelines for details of circuit inspection process.



**Table 4. Crew Audit Example**

<b>AEP FORESTRY CONTRACT (KPI) CREW AUDITS</b>		<b>No. 094626</b>	
Audit Date: ____/____/____ Audit Quarter: 1 2 3 4 (circle one)		Operating Co.: _____	
Auditor Name: _____		State: _____	
Crew Number: _____ District: _____		Forestry Region Number: _____	
Circuit #: _____		Foreman/ General Foreman: _____	
Circuit Name: _____		Pole Number: _____	

Forestry Contract Crew Safety (KPI) Audit		CHECK ONE PASS <input type="checkbox"/> FAIL <input type="checkbox"/>																																																				
Failure ratings for any single item will result in failure of this audit. Failure must be documented in comments fields and will require random periodic follow up observation.																																																						
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Reporting Accuracy (KPI) Audit			
Work ending Date: ____/____/____  Number of trees removed Number of trees removed Footage/ Under Acres Reclaimed Footage/ Under Acres Ground Sprayed YES <input type="checkbox"/> NO <input type="checkbox"/> Warning <input type="checkbox"/>	Termination Date Cap <input type="checkbox"/> OSM <input type="checkbox"/>	Audit Date Cap <input type="checkbox"/> OSM <input type="checkbox"/>	Variance Cap <input type="checkbox"/> OSM <input type="checkbox"/>

Non - KPI Crew Audit Items																																							
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ADDITIONAL COMMENTS: \_\_\_\_\_



**SOAH DOCKET NO. 473-19-4421  
PUC DOCKET NO. 49494**

**AEP TEXAS INC.'S RESPONSE TO OFFICE OF PUBLIC UTILITY COUNSEL'S  
THIRD REQUEST FOR INFORMATION**

**Question No. OPUC 3-13:**

Please provide all documents or studies that give an inventory of trees near distribution lines (by size, type, speed of growth, or any other measure used by AEP Texas) in each division of AEP Texas.

**Response No. OPUC 3-13:**

AEP Texas has no documents responsive to this request.

Prepared By: Charles R. Brower

Title: Dir Distr Engineering

Sponsored By: Thomas M. Coad

Title: VP Dist Region Ops

**SOAH DOCKET NO. 473-19-4421  
PUC DOCKET NO. 49494**

**AEP TEXAS INC.'S RESPONSE TO OFFICE OF PUBLIC UTILITY COUNSEL'S  
THIRD REQUEST FOR INFORMATION**

**Question No. OPUC 3-14:**

Mr. Coad testifies at p. 24, lines 13-16: "Although neither scenario can be considered a cycle based program, the vegetation management spend in the test year equates to about a 35-year cycle. The additional funding would result in approximately an 18-year cycle."

Please provide calculations supporting these cycle estimates, based on the number of trees, line miles, or any other metrics used by Mr. Coad.

**Response No. OPUC 3-14:**

See OPUC 3-6 attachment 1 Forestry Ask \$5M.

Prepared By: Charles R. Brower

Title: Dir Distr Engineering

Sponsored By: Thomas M. Coad

Title: VP Dist Region Ops

**SOAH DOCKET NO. 473-19-4421  
PUC DOCKET NO. 49494**

**AEP TEXAS INC.'S RESPONSE TO OFFICE OF PUBLIC UTILITY COUNSEL'S  
THIRD REQUEST FOR INFORMATION**

**Question No. OPUC 3-15:**

Mr. Coad provides total System Average Interruption Frequency Index ("SAIFI") and System Average Interruption Duration Index ("SAIDI") information in Figure 4 and SAIDI information due to vegetation on Figure 8 for 2015-2018.

- a. Please provide the same information by division.
- b. Please provide the same information from 2006-2014, by division if available.
- c. For each year from 2010-2018, by division if available, please provide information breaking down the causes of SAIDI and SAIFI (using categories similar to those in Attachment A – which appears to be an AEP-wide form for reporting performance that was provided by AEP SWEPCO in an earlier case).
- d. Please identify any elements that were not included in SAIDI and SAIFI for making these calculations on Figures 4 and 8 (e.g., major storm events, vandalism, customer equipment.) and identify the amount of SAIDI and SAIFI in each year from 2010-2018, by division if available, from each of those excluded items.

**Response No. OPUC 3-15:**

Please see OPUC 3-15 attachment 1, OPUC 3-15 attachment 2, and OPUC 3-15 attachment 3.

Prepared By: Kimete Seferi

Title: Regulatory Consultant

Sponsored By: Thomas M. Coad

Title: VP Dist Region Ops

TCC					
YEAR	SERVED	CI	CMI	SAIDI	SAIFI
2008	756229	126189	11359028	15.0	0.167
2009	762007	138223	13152933	17.3	0.181
2010	771978	137429	12362432	16.0	0.178
2011	782787	111454	10862619	13.9	0.142
2012	794653	139817	14620588	18.4	0.176
2013	803426	154157	14510797	18.1	0.192
2014	813976	170333	18551213	22.8	0.209
2015	823421	167024	19823724	24.1	0.203
2016	829475	156532	16945189	20.4	0.189
2017	835464	135598	14449867	17.3	0.162
2018	844645	159215	17766977	21.0	0.188

TNC					
SERVED	CI	CMI	SAIDI	SAIFI	
183987	7433	721639	3.92	0.040	
184413	13032	1097962	5.95	0.071	
185119	11826	1004903	5.43	0.064	
185354	8786	728855	3.93	0.047	
186521	17772	1865684	10.00	0.095	
187749	12272	1332901	7.10	0.065	
188988	4681	484395	2.56	0.025	
188981	18281	1732203	9.17	0.097	
188725	5718	606829	3.22	0.030	
189943	8496	1099625	5.79	0.045	
191798	6728	598880	3.12	0.035	

TOTAL AEP-TX					
SERVED	CI	CMI	SAIDI	SAIFI	
940216	133622	12080667	12.85	0.142	
946420	151255	14250895	15.06	0.160	
957097	149255	13367335	13.97	0.156	
968141	120240	11591474	11.97	0.124	
981174	157589	16486272	16.80	0.161	
991175	166429	15843698	15.98	0.168	
1002964	175014	19035608	18.98	0.174	
1012402	185305	21555927	21.29	0.183	
1018200	162250	17552018	17.24	0.159	
1025407	144094	15549492	15.16	0.141	
1036443	165943	18365857	17.72	0.160	

Row Labels	Sum of SAIDI	Sum of SAIFI
<b>ABNORMAL FEED</b>	<b>21.34096054</b>	<b>0.222851497</b>
2010	0.585966731	0.011727129
2011	1.813612893	0.023590572
2012	0.947645372	0.013058846
2013	1.761961309	0.022149469
2014	1.917119657	0.022325826
2015	2.644316191	0.022043615
2016	5.960199371	0.036334708
2017	0.994385644	0.012353144
2018	3.138761128	0.034262376
<b>ANIMAL - BIRD</b>	<b>23.33716679</b>	<b>0.318175794</b>
2010	3.106132398	0.047860353
2011	2.665724311	0.038130809
2012	1.857818287	0.024023262
2013	3.053742276	0.034304739
2014	2.431685484	0.025134501
2015	2.26629738	0.022627375
2016	2.463219407	0.047858967
2017	2.350782665	0.037415387
2018	2.236852388	0.028678856
<b>ANIMAL - NON BIRD</b>	<b>17.03081082</b>	<b>0.254496631</b>
2010	2.585874786	0.035950379
2011	2.70502747	0.04142785
2012	1.372733073	0.020719057
2013	1.495309103	0.019551542
2014	1.241023606	0.018885025
2015	1.072216373	0.01410013
2016	1.469220192	0.025647221
2017	1.119984552	0.016713364
2018	0.859224289	0.014432053
<b>ANIMAL - OTHER</b>	<b>11.00930241</b>	<b>0.131688151</b>
2010	0.761256174	0.017649204
2011	0.201847665	0.006325525
2012	1.112274683	0.015704656
2013	0.522995435	0.004625823
2014	1.629373537	0.011977499
2015	1.786653918	0.021397627
2016	1.841692202	0.019838931
2017	1.474495493	0.015382185
2018	0.782490692	0.00489752
<b>ANIMAL BUS</b>	<b>5.487496424</b>	<b>0.054670423</b>
2010	1.242790438	0.008302189
2011	0.094584363	0.001522506
2012	0.008996366	9.88612E-05

2013	1.748192801	0.015956819
2014	0.096586717	0.000605206
2015	0.178245401	0.002344918
2016	0.050966411	0.000322137
2017	0.848623035	0.009414798
2018	0.297334248	0.002708301
<b>ANIMAL BUSHING XFMR</b>	<b>1.38258636</b>	<b>0.008830778</b>
2010	0.356620071	0.003610919
2013	0.246324817	0.00097561
2014	0.006442903	0.000105687
2015	0.492679785	0.00158929
2017	0.084248498	0.000757748
2018	0.131031808	0.000971592
<b>CONTAMINATION/FLASHOVER</b>	<b>84.37483216</b>	<b>0.785386309</b>
2010	4.593586648	0.043904641
2011	19.25446707	0.175076771
2012	4.248847809	0.050918593
2013	24.15088859	0.174878301
2014	5.414701824	0.052174355
2015	5.215918183	0.054236361
2016	3.136150069	0.040226871
2017	4.063463581	0.055824663
2018	3.094271465	0.030459948
<b>CORROSION</b>	<b>0.87597684</b>	<b>0.008781562</b>
2017	0.093427293	0.000778228
2018	0.782549547	0.008003334
<b>EQUIPMENT FAILURE</b>	<b>405.374235</b>	<b>3.725151054</b>
2010	34.51091791	0.309383479
2011	37.52206032	0.33887316
2012	35.51353277	0.335282019
2013	32.22553939	0.330605594
2014	39.02384433	0.366108853
2015	38.82027396	0.350708513
2016	42.35259969	0.370456688
2017	47.25961789	0.413017465
2018	53.30232053	0.473732757
<b>ERROR - FIELD</b>	<b>5.045376247</b>	<b>0.123497749</b>
2010	0.266017969	0.004333939
2011	0.112489813	0.00563451
2012	0.302077919	0.014519341
2013	0.372509395	0.009870104
2014	1.003602323	0.012553791
2015	0.297996251	0.010887967
2016	0.931847378	0.020506777
2017	0.438039725	0.009759052
2018	0.987200454	0.030372148
<b>ERROR - OPERATIONS</b>	<b>0.401529782</b>	<b>0.013069178</b>



2010	0.000140007	2.08965E-06
2011	0.046280449	0.003186519
2012	0.019744714	0.001851863
2013	0.028327995	0.000996797
2014	0.092028228	0.002521526
2015	0.021729511	0.000795139
2016	0.166824789	0.002350226
2017	7.70426E-05	9.75223E-07
2018	0.000680211	1.15781E-05
<b>ERROR-FIELD</b>	<b>9.84135E-05</b>	<b>1.92968E-06</b>
2018	9.84135E-05	1.92968E-06
<b>FACILITATION OF WORK</b>	<b>0.113882173</b>	<b>0.002942553</b>
2017	0.03655134	0.000343278
2018	0.077330832	0.002599275
<b>FOREIGN OBJECT (NON ANIMAL)</b>	<b>8.770236064</b>	<b>0.1315906</b>
2010	0.480999314	0.008002324
2011	1.276382263	0.015494644
2012	1.211229609	0.015917666
2013	0.745276061	0.008701793
2014	0.626922801	0.012721294
2015	0.468553006	0.007148346
2016	0.981637203	0.015773915
2017	0.867682784	0.014508385
2018	1.491863035	0.023773618
<b>OTHER</b>	<b>1.415297718</b>	<b>0.021418926</b>
2010	0.001642467	1.56724E-05
2011	0.021910032	0.000136344
2012	0.125010447	0.001715292
2013	0.022206977	0.000260297
2014	0.053182367	0.001428765
2015	0.488524321	0.00404286
2016	0.145324101	0.001679434
2017	0.017720768	0.000188218
2018	0.000266295	3.85935E-06
<b>OVERLOAD</b>	<b>26.93894581</b>	<b>0.287175219</b>
2010	2.819688078	0.033725944
2011	3.409257536	0.038776377
2012	1.273961601	0.015555855
2013	2.070373042	0.024409413
2014	5.364860553	0.040212809
2015	2.138171398	0.024226542
2016	1.456211943	0.020704184
2017	1.546542982	0.015923433
2018	2.210308719	0.02922592
<b>OVERVOLTAGE</b>	<b>2.43806E-05</b>	<b>9.75223E-07</b>
2017	2.43806E-05	9.75223E-07
<b>RELAY MIS-OPERATION</b>	<b>7.179969705</b>	<b>0.067995312</b>

2010	0.673411368	0.007935455
2011	0.373222495	0.006413322
2012	0.783418639	0.004454867
2013	0.276955129	0.003749086
2014	0.284743022	0.004239434
2015	3.346013738	0.023487705
2016	0.302767629	0.00263406
2017	0.071910958	0.005136497
2018	0.747912813	0.006309078
<b>TREE INSIDE ROW</b>	<b>158.6311817</b>	<b>1.53529453</b>
2010	13.33793127	0.149230433
2011	11.59563948	0.121226144
2012	16.13474572	0.15414799
2013	15.32413852	0.161985522
2014	18.00450864	0.165788603
2015	20.63279409	0.177713003
2016	16.86295816	0.155875074
2017	14.85299983	0.138238768
2018	17.23975269	0.156317328
<b>TREE OUT OF ROW</b>	<b>4.54026881</b>	<b>0.041496713</b>
2010	0.628610266	0.006715098
2011	0.32395178	0.002478978
2012	0.560423533	0.005489342
2013	0.56996595	0.004991046
2014	0.920456766	0.00810398
2015	0.552165049	0.004340173
2016	0.227849146	0.001816932
2017	0.228168912	0.001578885
2018	0.116704923	0.000935893
<b>TREE REMOVAL (NON AEP)</b>	<b>1.465995774</b>	<b>0.021392532</b>
2010	0.220113531	0.004859487
2011	0.155001183	0.002391181
2012	0.257608742	0.005733947
2013	0.040362196	0.000505461
2014	0.199758915	0.002187516
2015	0.157958005	0.001209006
2016	0.035482224	0.000489098
2017	0.087752473	0.000953768
2018	0.071995276	0.000356025
<b>UNBALANCE</b>	<b>0.374572695</b>	<b>0.004454806</b>
2010	8.25413E-05	1.04483E-06
2011	0.135636235	0.00171256
2012	0.000324102	3.05756E-06
2013	0.001171337	8.07123E-06
2014	4.28729E-05	9.97045E-07
2015	0.095122293	0.000421769
2016	0.0877912	0.000193479

2018	0.000730383	2.70155E-05
<b>UNKNOWN (NON WEATHER)</b>	<b>76.01602546</b>	<b>1.020226013</b>
2010	7.424529593	0.105396841
2011	9.745248884	0.12095139
2012	11.1310583	0.136293868
2013	10.030595	0.124620778
2014	6.007991314	0.079629977
2015	7.361173723	0.097974915
2016	8.052533883	0.111108819
2017	3.185832552	0.051705323
2018	7.724145949	0.120296051
<b>VEHICLE ACCIDENT (NON AEP)</b>	<b>113.492231</b>	<b>1.089275301</b>
2010	11.7798499	0.123426361
2011	11.98872168	0.112601367
2012	10.57339575	0.112011733
2013	10.98633844	0.096625722
2014	11.68918226	0.106625961
2015	13.8919767	0.117233075
2016	12.02942644	0.120081516
2017	12.32508555	0.11447162
2018	9.766044056	0.093159971
<b>VINE</b>	<b>1.006855822</b>	<b>0.009206149</b>
2011	0.053327976	0.000491664
2012	0.107428448	0.000975362
2013	0.090659066	0.000934245
2014	0.054387795	0.000604209
2015	0.10690615	0.000981823
2016	0.147473974	0.001657828
2017	0.083046049	0.000706061
2018	0.363626364	0.002854957
<b>WEATHER - FLOOD/SLIDE</b>	<b>0.762409574</b>	<b>0.001050323</b>
2010	0.695059121	0.000912133
2012	0.000509594	5.09594E-06
2013	0.022478372	2.32048E-05
2015	0.000865269	6.91425E-06
2016	0.009248674	1.27676E-05
2017	0.000485661	1.95045E-06
2018	0.033504013	6.07848E-05
<b>WEATHER - HIGH WINDS (EXCEEDING 60 MPH)</b>	<b>3.415261804</b>	<b>0.020254628</b>
2010	0.011667574	0.000185979
2011	0.178494661	0.002258968
2012	0.087316827	0.002311517
2013	0.48268671	0.003269856
2015	0.493833477	0.001034174
2016	0.018762522	6.48203E-05
2017	0.543122877	0.003281624
2018	1.518939295	0.007562403

<b>WEATHER - HURRICANE</b>	<b>0.185059211</b>	<b>0.000430941</b>
2010	0.015916882	5.22413E-05
2016	0.000418385	5.89275E-06
2017	0.164015849	0.000354981
2018	0.003900842	1.25429E-05
<b>WEATHER - ICE (1/2 INCH OR &gt; 6 " SNOW)</b>	<b>2.334409093</b>	<b>0.011868451</b>
2010	0.01412814	0.000265386
2011	0.011547905	2.68556E-05
2013	0.256668096	0.001036144
2014	0.146870675	0.001240324
2015	1.139171989	0.004862693
2016	0.001044981	1.5714E-05
2017	0.680441035	0.003666837
2018	0.078848523	0.000710121
<b>WEATHER - LIGHTNING</b>	<b>184.4973434</b>	<b>1.393472778</b>
2010	11.83850749	0.092467117
2011	10.12939334	0.074478821
2012	22.80345178	0.165068581
2013	15.10997453	0.129010518
2014	14.43297865	0.113096781
2015	27.13593019	0.18408399
2016	25.92163917	0.199038499
2017	22.03435514	0.153114812
2018	19.46744394	0.143769604
<b>WEATHER - TORNADO</b>	<b>3.029158058</b>	<b>0.007905065</b>
2011	7.95339E-05	1.03291E-06
2012	2.388679276	0.005921478
2013	0.018207683	6.75965E-05
2015	0.022082137	0.000160015
2016	0.069638578	0.00061481
2017	0.033838271	3.41328E-05
2018	0.000477595	2.89452E-06
<b>WEATHER - UNKNOWN</b>	<b>128.7103086</b>	<b>1.198361389</b>
2010	8.188429177	0.082601868
2011	10.6986503	0.098900883
2012	14.65027406	0.123988202
2013	10.71569703	0.109205741
2014	12.43978847	0.118185698
2015	17.54824665	0.135701036
2016	13.36916421	0.121424082
2017	17.5712561	0.190257137
2018	10.32897805	0.105960482
<b>WEATHER-FLOOD/SLIDE</b>	<b>0.000394619</b>	<b>4.82419E-06</b>
2018	0.000394619	4.82419E-06
(blank)		
(blank)		
<b>Grand Total</b>	<b>1298.540203</b>	<b>12.51241908</b>

<b>YEARS</b>	<b>FORCED SAIDI</b>	<b>FORCED SAIFI</b>	<b>SAIDI EXCLUDED DATA</b>	<b>SAIFI EXCLUDED DATA</b>
2008	107.12	1.160	689.15	0.717
2009	128.58	1.316	32.38	0.409
2010	106.14	1.099	131.44	0.462
2011	124.51	1.232	148.75	0.978
2012	127.47	1.226	75.02	0.420
2013	132.37	1.283	60.32	0.414
2014	123.08	1.166	46.91	0.609
2015	148.38	1.285	107.78	0.638
2016	138.09	1.317	112.59	0.484
2017	133.06	1.266	1569.70	0.834
2018	136.86	1.322	56.78	0.439

**Excluded**

Major Cause Code of Transmission Line, Transmission Station, SubTransmission, Non Interruption and Generation.

Minor Cause Codes of Blast Explosion Non AEP, Customer Equipment, Fire Non AEP, Other Utility, Scheduled Co

Interrupt Type = Momentary

Clearing Device = "Non-Interruption"

Major Event Code = Yes

**SOAH DOCKET NO. 473-19-4421  
PUC DOCKET NO. 49494**

**AEP TEXAS INC.'S RESPONSE TO OFFICE OF PUBLIC UTILITY COUNSEL'S  
THIRD REQUEST FOR INFORMATION**

**Question No. OPUC 3-16:**

How many trees does AEP Texas plan to trim and remove, how many acres of brush does it plan to clear, and how much herbicide does it plan to use (in dollars and physical quantities) by division if AEP Texas is granted: (a) the \$5 million recommended in Mr. Coad's testimony at p. 23; or (b) the \$8.839 million recommended in Mr. Coad's testimony, plus the amount in WP II-D-1-13. Please provide this information by division if available.

**Response No. OPUC 3-16:**

The additional vegetation management activities to be completed based on the additional (a) \$5 million recommended by Mr. Coad's testimony at p. 23 is:

Activity	Central	North
Trees Trimmed	13,470	3,220
Trees Removed	7,840	2,060
Miles Mowed	16	75
Tree Growth Regulator	\$133,340	\$22,150
Herbicide	\$125,000	\$77,000

(b) The additional vegetation management activities related to the \$8.839 million will be the same as those shown above, as explained in OPUC 3-1 the additional \$3.839 million represents the amount that AEP Texas capitalized in the test year associated with items such as expanding a right of way.

Prepared By: Charles R. Brower

Title: Dir Distr Engineering

Sponsored By: Thomas M. Coad

Title: VP Dist Region Ops

**SOAH DOCKET NO. 473-19-4421  
PUC DOCKET NO. 49494**

**AEP TEXAS INC.'S RESPONSE TO OFFICE OF PUBLIC UTILITY COUNSEL'S  
THIRD REQUEST FOR INFORMATION**

**Question No. OPUC 3-17:**

Please provide the results of all customer satisfaction surveys for AEP Texas's service area (and each division where surveys were given) regarding satisfaction with service reliability for each year from 2014-2018. Please provide the questions and answers and relevant excerpts from the reports.

**Response No. OPUC 3-17:**

See the attached file, OPUC\_3-17\_Attachment\_1.pdf.

Prepared By: William M. Romine

Title: Regulatory Consultant Staff

Sponsored By: Thomas M. Coad

Title: VP Dist Region Ops

**OPUC\_3-17**

**Market Strategies International Random Reputation Study**

*Q15 How would you rate the overall ability to provide you with electricity without interruption?*

*Scale: 0-10 where zero means they are doing an extremely poor job, 10 means they are doing an extremely good job. Five means neither good nor poor job. Score represents 6-10*

**Residential**

	AEP Texas	TNC	TNN	AEP SYSTEM
2014	85.9	n/a	n/a	85.2
2015	87.3	n/a	n/a	87.9

**Commercial**

	AEP Texas	TNC	TNN	AEP SYSTEM
2014	92.6	n/a	n/a	90.8
2015	90.5	n/a	n/a	n/a

**MSR Random Reputation Study**

*Q6C Performance regarding expectations to deliver reliable electric service*

*Scale: 1-5 Excellent, Good, Just Okay, Poor, Terrible*

*Score represents Excellent and Good responses*

**Residential**

	AEP Texas	TNC	TNN	AEP SYSTEM
2016	77.7	76.5	83.5	77.0
2017	87.7	86.8	90.8	85.1
2018	88.6	89.8	83.9	84.5

**Commercial**

	AEP Texas	TNC	TNN	AEP SYSTEM
2016	80.4	79.1	85.0	75.3
2017	85.0	83.6	89.8	85.0
2018	87.8	86.3	92.4	84.5



**SOAH DOCKET NO. 473-19-4421  
PUC DOCKET NO. 49494**

**AEP TEXAS INC.'S RESPONSE TO OFFICE OF PUBLIC UTILITY COUNSEL'S  
THIRD REQUEST FOR INFORMATION**

**Question No. OPUC 3-18:**

Please provide all benchmarking studies comparing AEP Texas's service reliability and/or outages due to vegetation management to that of other utilities from 2014-2018.

**Response No. OPUC 3-18:**

The Company is not aware of a specific benchmarking study that compares reliability/outages due to vegetation to that of other utilities.

Prepared By: William M. Romine

Title: Regulatory Consultant Staff

Sponsored By: Thomas M. Coad

Title: VP Dist Region Ops

**SOAH DOCKET NO. 473-19-4421  
PUC DOCKET NO. 49494**

**AEP TEXAS INC.'S RESPONSE TO OFFICE OF PUBLIC UTILITY COUNSEL'S  
THIRD REQUEST FOR INFORMATION**

**Question No. OPUC 3-19:**

Please provide any invoices supporting the requested expenses for dues for the Association of Electric Companies of Texas ("AECT"), shown on Schedule II-D-2.6a for the AEP Texas Central Division. Are any portions of the AECT costs included as below-the-line?

**Response No. OPUC 3-19:**

Please see OPUC 3-19 Attachment 1 AECT Invoices for the requested invoices. The quarterly legislative advocacy portion of \$56,661 is recorded below the line while the non-legislative quarterly portion of \$27,184 is recorded above the line and included in cost of service.

Prepared By: David W. Lee

Title: Accountant Sr

Sponsored By: Gilbert Hughes

Title: Dir Regulatory Svcs

Sponsored By: Randall W. Hamlett

Title: Dir Regulatory Acctg Svcs

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00849035



MSC 211 00849035

## AP Feeder System Cover Sheet

**DO NOT PAY**

Use this cover sheet to send documents to Accounts Payable that are related to vendor payments initiated via an electronic interface. Account Payable will process this cover sheet and related documents, and reference the vendor payment generated from the electronic interface.

The following invoice was submitted electronically to Accounts Payable.

Business Unit:	211
Voucher Number:	00849035
Invoice Number:	85942
Invoice Amount:	\$27,183.51
Vendor Number:	0000096469
Vendor Name:	ASSOCIATION OF ELECTRIC
Contract/PO:	
Pay Authorization:	
Submitted by:	SALAZAR, CHRISTINA M
Date Received:	02/09/2018

Notes:

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Rt# 33856  
PH#85941

Neal Walker, Chair • Seth Blocker, Vice Chair • Julia Rathgeber, President & CEO • Ben Gaffney, Vice President and Corporate Secretary

November 7, 2017

Judith Talavera  
AEP  
539 N. Carmichael  
17th Floor  
Corpus Christi, TX 78401

Dear Judith:

AEP Texas' pro-rata assessment for the 4<sup>th</sup> quarter of the AECT dues (October, November, December 2017) is \$88,013.03. Please make your check payable to the Association of Electric Companies of Texas, Inc., and mail it to 1005 Congress Avenue, Suite 600, Austin, Texas 78701, Attn: Julia Rathgeber, President & CEO.

This is the quarterly assessment for the total amount of AECT dues, and includes the budgeted amount for AECT operations, Advocacy Programs and our External Lobbyists. It also includes the quarterly fee for your market sector council membership(s), as well as your prorated share of the AECT sponsorship budget.

AEP Texas' 2017 Dues are as follows:

AECT Operating Budget	\$319,010.00
Regulated Market Sector Council Membership	\$12,592.50
SWECO Regulated Market Sector Council Membership	\$12,592.50
Sponsorships Account	\$7,857.14
2017 Total	\$352,052.14
	(\$264,039.10)

4th Quarter Assessment

\$88,013.04

Please call myself or Jessica DeLeon at 512 474-6774 if you have any questions or need additional information.

Yours very truly,

Julia Rathgeber

APPROVED  
1/31/18  
MEMBERSHIP

75% of the AECT operating budget is set aside for lobbying expenses

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Neal Walker, Chairman; Doug Blocher, Vice Chairman; Julia Rathgeber, President & CEO; Ben Galtner, Vice President and Corporate Secretary

RH 83857

RH 85942

November 7, 2017

Juliah Talavera  
AEP  
539 N. Caranshine  
17th Floor  
Corpus Christi, TX 78401

Dear Juliah:

AEP Texas' pro-rata assessment for the 4<sup>th</sup> quarter of the AECT dues (October, November, December 2017) is \$88,013.03. Please make your check payable to the Association of Electric Companies of Texas, Inc. and mail it to 1005 Congress Avenue, Suite 600, Austin, Texas 78701. Attn: Julia Rathgeber, President & CEO.

This is the quarterly assessment for the total amount of AECT dues, and includes the budgeted amount for AECT operations, Advocacy Programs and our External Lobbyists. It also includes the quarterly fee for your market sector council membership(s), as well as your prorated share of the AECT sponsorship budget.

AEP Texas' 2017 Dues are as follows:

AECT Operating Budget	\$319,010.00
Regulated Market Sector Council Membership	\$12,592.50
SWEPCC Regulated Market Sector Council Membership	\$12,592.50
Sponsorships Account	\$7,857.14
2017 Total	\$352,052.14

AEP TX  
pro-rata share  
\$88,013.03

4th Quarter Assessment \$88,013.03

Please call myself or Jessica Del.com at 512 474 1111 if you have any questions or need additional information.

Yours very truly,

*Julia Rathgeber*  
Julia Rathgeber

*11/31/17*  
*MEMORANDUM*

75% of the AECT operating budget is set aside for lobbying expenses

**THE FACE OF THIS DOCUMENT HAS A COLORED BACKGROUND - NOT A WHITE BACKGROUND**



*Julie Williams*  
Authorized Signature

#3000133036# 1:0311002091: 38647985#

00863317



MSC 211 00863317

### AP Feeder System Cover Sheet

**DO NOT PAY**

Use this cover sheet to send documents to Accounts Payable that are related to vendor payments initiated via an electronic interface. Account Payable will process this cover sheet and related documents, and reference the vendor payment generated from the electronic interface.

The following invoice was submitted electronically to Accounts Payable.

---

Business Unit:	211
Voucher Number:	00863317
Invoice Number:	87221
Invoice Amount:	\$27,183.51
Vendor Number:	0000096469
Vendor Name:	ASSOCIATION OF ELECTRIC
Contract/PO:	
Pay Authorization:	
Submitted by:	SALAZAR,CHRISTINA M
Date Received:	04/26/2018

---

Notes:





Check Date 04/27/2018				Check No 3000133541	
Invoice Number	Invoice Date	P.O. Number	Voucher ID	Gross Amount	Adjusted Amount
87220	04/26/2018		00863316	57,661.00	57,661.00
Lina Salazar, AEP Texas, Corpus Christi AEP TA Lobby 2018 1st Qtr					
87221	04/26/2018		00863317	27,183.51	27,183.51
Lina Salazar, AEP Texas, Corpus Christi 2018 1st Qtr AEP TA non-lobby					

Vendor Number	Vendor Name	
0000096469	ASSOCIATION OF ELECTRIC	
Total Amount	Total Adjustments	Total Paid Amount
\$84,844.57	\$0.00	\$84,844.57

AEP Texas Central Division-Dis
P O Box 24400
Canton, OH 44701
877/286-2729

**THE FACE OF THIS DOCUMENT HAS A COLORED BACKGROUND - NOT A WHITE BACKGROUND**



**AEP TEXAS CENTRAL DIVISION-DIS**  
P O Box 24400  
Canton, OH 44701

CITIBANK N.A.  
New Castle DE 19720  
62-20311

3000133541  
Date 04/27/2018

884.844.57

Page

\*\*\*EIGHTY-FOUR THOUSAND EIGHT HUNDRED FORTY-FOUR AND 57/100 DOLLAR\*\*\*

To The  
Order Of

ASSOCIATION OF ELECTRIC  
COMPANIES OF TEXAS INC  
1005 CONGRESS AVE STE 600  
AUSTIN, TX 78701

Pay Amount \$84,844.57\*\*\*

*Julie Williams*  
Authorized Signature

THIS DOCUMENT IS PRINTED ON WATERMARKED PAPER - HOLD TO LIGHT TO VIEW

## 3000 13354 1## 1:03 1100 2091: 3864798 5##

00873158



MSC 211 00873158

## AP Feeder System Cover Sheet

**DO NOT PAY**

Use this cover sheet to send documents to Accounts Payable that are related to vendor payments initiated via an electronic interface. Account Payable will process this cover sheet and related documents, and reference the vendor payment generated from the electronic interface.

The following invoice was submitted electronically to Accounts Payable.

---

Business Unit:	211
Voucher Number:	00873158
Invoice Number:	87688
Invoice Amount:	\$27,183.51
Vendor Number:	0000096469
Vendor Name:	ASSOCIATION OF ELECTRIC
Contract/PO:	
Pay Authorization:	
Submitted by:	SALAZAR, CHRISTINA M
Date Received:	06/14/2018

---

Notes:

[illegible]

**THE FACE OF THIS DOCUMENT HAS A COLORED BACKGROUND - NOT A WHITE BACKGROUND**



**AEP TEXAS CENTRAL DIVISION-DIS**  
P O Box 24400  
Canton, OH 44701

CITIBANK, N.A.  
New Castle, DE 19720  
62-20311

3000133785

Date: 06/15/2018

**\$84,844.57**  
EIGHTYFOUR THOUSAND EIGHT FOUR FOUR DOLLARS AND FIVE CENTS

**Pay**

\*\*\*EIGHTY-FOUR THOUSAND EIGHT HUNDRED FORTY-FOUR AND 57 / 100 DOLLAR\*\*\*

To The  
Order Of

ASSOCIATION OF ELECTRIC  
COMPANIES OF TEXAS INC  
1005 CONGRESS AVE STE 600  
AUSTIN, TX 78701

**Pay Amount 584,844.57\*\*\***

*Julie Williams*  
Authorized Signature

**THIS DOCUMENT IS PRINTED ON WATERMARKED PAPER - HOLD TO LIGHT TO VIEW**



1005 Congress Ave. Suite 600 • Austin, Texas 78701  
Phone: 512-474-6725 • Fax: 512-474-6726  
E-mail: info@aect.org • Web: www.aect.org

May 23, 2018

Julio Reyes  
AEP Texas  
530 N. Carancahua  
Corpus Christi, TX 78401

Dear Julio

AEP Texas' pro-rata assessment for the 2<sup>nd</sup> quarter of the AECT dues (January, February, and March 2018) is \$88,013.03. Please make your check payable to the Association of Electric Companies of Texas, Inc., and mail it to 1005 Congress Avenue, Suite 600, Austin, Texas 78701, Attn: Julia Rathgeber, President & CEO.

This is the quarterly assessment for the total amount of AECT dues, and includes the budgeted amount for AECT operations, Advocacy Programs and our External Lobbyists. It also includes the quarterly fee for your market sector council membership(s), as well as your prorated share of the AECT sponsorship budget.

AEP Texas' 2018 Dues are as follows:

AECT Operating Budget	\$319,010.00
Regulated Market Sector Council Membership	\$12,592.50
SWEPCO Regulated Market Sector Council Membership	\$12,592.50
Sponsorships Account	\$7,857.14
2018 Total	\$352,052.14

2<sup>nd</sup> Quarter Assessment

\$88,013.03

Please call me or Jessica DeLeon at 512-474-6725 if you have any questions or need additional information.

Yours very truly,

*Julia Rathgeber*  
Julia Rathgeber

\$57,661.06  
AEP TX  
Lobby

5/29/18  
APPROVED  
*John C. Ryan*

75% of the AECT operating budget is set aside for lobbying expenses

R# 85341  
P# 87688



Page 11 of 30

Table 10.1

Table 10.1

ALCT is a private, non-profit organization that is dedicated to the advancement of the electric utility industry. ALCT is a 501(c)(3) organization and is not affiliated with any government agency. ALCT is a member of the American Electric Power Association (AEP) and is a member of the American Electric Power Association's (AEP) Advocates Program. ALCT is a member of the American Electric Power Association's (AEP) Advocates Program. ALCT is a member of the American Electric Power Association's (AEP) Advocates Program.

This is the quarterly assessment of the total amount of ALCT dues and includes the budgeted amount for ALCT Operations, Advocates Programs, and Annual Lobbying. It also includes the quarterly fee for your market sector council membership(s) as well as your proportional share of the ALCT Sponsorship budget.

ALP Texas' 2018 Dues are as follows:

ALCT Operating Budget	\$319,010.00
Regulated Market Sector Council Membership	\$12,597.50
SOEPCO Regulated Market Sector Council Membership	\$12,597.50
Sponsorship Account	\$1,607.13
<b>Total</b>	<b>\$345,812.13</b>

Other Expenses

Other Expenses (Total) = \$345,812.13

Other Expenses

Other Expenses

Other Expenses

# 27,183.51  
AEP TX  
Non-Lobby

Approved  
JL. C. 11-1

75% of the ALCT operating budget is set aside for lobbying expenses

00901384



MSC 211 00901384

## AP Feeder System Cover Sheet

**DO NOT PAY**

Use this cover sheet to send documents to Accounts Payable that are related to vendor payments initiated via an electronic interface. Account Payable will process this cover sheet and related documents, and reference the vendor payment generated from the electronic interface.

The following invoice was submitted electronically to Accounts Payable.

---

Business Unit:	211
Voucher Number:	00901384
Invoice Number:	88684
Invoice Amount:	\$27,183.51
Vendor Number:	0000096469
Vendor Name:	ASSOCIATION OF ELECTRIC
Contract/PO:	
Pay Authorization:	
Submitted by:	SALAZAR, CHRISTINA M
Date Received:	11/02/2018

---

Notes:

Check Date 11/05/2018		Check No. 3000134341	
Invoice Number	Invoice Date	PO Number	Voucher ID
88683	11/02/2018		00901383
Tina Salazar, AEP Texas, Corpus Christi 2018 3rd Qtr AEP TX Lobby			
88684	11/02/2018		00901384
Tina Salazar, AEP Texas, Corpus Christi 2018 3rd Qtr AEP Texas Non-lobby			

Invoice Number	Invoice Date	PO Number	Voucher ID	Gross Amount	Adjustments	Paid Amount
88683	11/02/2018		00901383	57,661.06	0.00	57,661.06
Tina Salazar, AEP Texas, Corpus Christi 2018 3rd Qtr AEP TX Lobby						
88684	11/02/2018		00901384	27,183.51	0.00	27,183.51
Tina Salazar, AEP Texas, Corpus Christi 2018 3rd Qtr AEP Texas Non-lobby						

Vendor Number	Vendor Name	
0000096469	ASSOCIATION OF ELECTRIC	
Total Amount	Total Adjustments	Total Paid Amount
\$84,844.57	\$0.00	\$84,844.57

**AEP Texas Central Division-Dis**  
P O Box 24400  
Canton, OH 44701  
877/286-2729

**THE FACE OF THIS DOCUMENT HAS A COLORED BACKGROUND - NOT A WHITE BACKGROUND**

**REP AMERICAN  
ELECTRIC  
POWER**

AEP TEXAS CENTRAL DIVISION-DIS  
P.O. Box 24400  
Canton, OH 44701

CITIBANK, N.A.  
New Castle, DE 19720  
62-20311-

3000134341  
Date: 11/05/2018.

**\$84,844.57**

Psy.

\*\*\*EIGHTY-FOUR THOUSAND EIGHT HUNDRED FORTY-FOUR AND 57/100 DOLLAR\*\*\*

To The  
Order Of

ASSOCIATION OF ELECTRIC  
COMPANIES OF TEXAS INC  
1005 CONGRESS AVE STE 600  
AUSTIN, TX 78701

Pay Amount \$84,844.57\*\*\*

*Julie Williams*  
Authorized Signature

Authorized Signature \_\_\_\_\_

THIS DOCUMENT IS PRINTED ON WATERMARKED PAPER - HOLD TO LIGHT TO VIEW

[illegible]

R# 80400  
P# 88683



Neal Wolff, Chair • Sam Blocker, Vice Chair • Julia Rathgeber, President & CEO • Bret Gaffney, Vice President and Corporate Secretary

September 11, 2018

Julio Reyes  
AEP Texas  
539 N Carancahua  
Corpus Christi, TX 78401

Dear Julio:

AEP Texas' pro-rata assessment for the 3<sup>rd</sup> quarter of the AECT dues (July, August and September 2018) is \$88,013.03. Please make your check payable to the Association of Electric Companies of Texas, Inc., and mail it to 1005 Congress Avenue, Suite 600, Austin, Texas 78701, Attn: Julia Rathgeber, President & CEO.

This is the quarterly assessment for the total amount of AECT dues, and includes the budgeted amount for AECT operations, Advocacy Programs and our External Lobbyists. It also includes the quarterly fee for your market sector council membership(s), as well as your prorated share of the AECT sponsorship budget.

AEP Texas' 2018 Dues are as follows:

AECT Operating Budget	\$319,010.00
Regulated Market Sector Council Membership	\$12,592.50
SWPCO Regulated Market Sector Council Membership	\$12,592.50
Sponsorships Account	\$7,857.14
2018 Total	\$352,052.14

3rd Quarter Assessment

\$88,013.03

Please call me or Jessica DeLeon at 512 474-6725 if you have any questions or need additional information.

Yours very truly,

*Julia Rathgeber*  
Julia Rathgeber

\$57,661.06

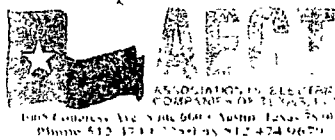
AEP TX Lobby

APPROVED  
Jul C [Signature]  
10/2/18

75% of the AECT operating budget is set aside for lobbying expenses



R# 80401  
D# 88684



September 11, 2018

Julio Reyes  
AEP Texas  
530 N Caracahua  
Corpus Christi, TX 78401

Dear Julio

AEP Texas' pro-rata assessment for the 3<sup>rd</sup> quarter of the AECT dues (July, August and September 2018) is \$88,013.03. Please make your check payable to the Association of Electric Companies of Texas, Inc., and mail it to 1005 Congress Avenue, Suite 600, Austin, Texas 78701, Attn: Julia Rathgeber, President & CEO.

This is the quarterly assessment for the total amount of AECT dues, and includes the budgeted amount for AECT operations, Advocacy Programs and our External Lobbyists. It also includes the quarterly fee for your market sector council membership(s), as well as your prorated share of the AECT sponsorship budget.

AEP Texas' 2018 Dues are as follows:

AECT Operating Budget	\$319,010.00
Regulated Market Sector Council Membership	\$12,592.50
SWEPSCO Regulated Market Sector Council Membership	\$12,592.50
Sponsorships Account	\$7,857.14
2018 Total	\$352,052.14

3<sup>rd</sup> Quarter Assessment

\$88,013.03

Please call me or Jessica Del.com at 512-474-6735 if you have any questions or need additional information.

Yours very truly,

Julia Rathgeber

\$27,183.51

AEP TX

non-lobby

APPROVED

Julia G. Rathgeber  
10/2/18

\*5% of the AECT operating budget is set aside for lobbying expenses

00901383



MSC 211 00901383

## AP Feeder System Cover Sheet

**DO NOT PAY**

Use this cover sheet to send documents to Accounts Payable that are related to vendor payments initiated via an electronic interface. Account Payable will process this cover sheet and related documents, and reference the vendor payment generated from the electronic interface.

The following invoice was submitted electronically to Accounts Payable.

---

Business Unit:	211
Voucher Number:	00901383
Invoice Number:	88683
Invoice Amount:	\$57,661.06
Vendor Number:	0000096469
Vendor Name:	ASSOCIATION OF ELECTRIC
Contract/PO:	
Pay Authorization:	
Submitted by:	SALAZAR,CHRISTINA M
Date Received:	11/02/2018

---

Notes:

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**AEP AMERICAN ELECTRIC POWER**

**AEP TEXAS CENTRAL DIVISION-DIS**  
P O Box 24400  
Canton, OH 44701

CITIBANK, N.A.  
New Castle, DE 19720  
62-20311  
CITY OF NEW YORK, NEW YORK

3000134341  
Date: 11/05/2018

**\$84,844.57**

DOLLAR EIGHTY FOUR THOUSAND EIGHT HUNDRED FORTY FOUR AND 57/100 DOLLAR

Pay: \*\*\*EIGHTY-FOUR THOUSAND EIGHT HUNDRED FORTY-FOUR AND 57/100 DOLLAR\*\*\*

To The Order Of  
ASSOCIATION OF ELECTRIC COMPANIES OF TEXAS INC  
1005 CONGRESS AVE STE 600  
AUSTIN, TX 78701

Pay Amount: \$84,844.57\*\*\*  
*Julie Williams*  
Authorized Signature

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R# 86460  
P# 88683



Neal Waller, Chair • Sam Hockett, Vice Chair • Julia Rathgeber, President & CEO • Pam Gaffney, Vice President and Corporate Secretary

September 11, 2018

Julio Reyes  
AEP Texas  
539 N Caranuahua  
Corpus Christi, TX 78401

Dear Julio:

AEP Texas' pro-rata assessment for the 3<sup>rd</sup> quarter of the AECT dues (July, August and September 2018) is \$88,013.03. Please make your check payable to the Association of Electric Companies of Texas, Inc., and mail it to 1005 Congress Avenue, Suite 600, Austin, Texas 78701. Attn: Julia Rathgeber, President & CEO.

This is the quarterly assessment for the total amount of AECT dues, and includes the budgeted amount for AECT operations, Advocacy Programs and our External Lobbyists. It also includes the quarterly fee for your market sector council membership(s), as well as your prorated share of the AECT sponsorship budget.

AEP Texas' 2018 Dues are as follows:

AECT Operating Budget	\$319,010.00
Regulated Market Sector Council Membership	\$12,592.50
SWEPCO Regulated Market Sector Council Membership	\$12,592.50
Sponsorships Account	\$7,857.14
2018 Total	\$352,052.14

3rd Quarter Assessment

\$88,013.03

Please call me or Jessica DeLeon at 512 474-6725 if you have any questions or need additional information.

Yours very truly,

*Julia Rathgeber*  
Julia Rathgeber

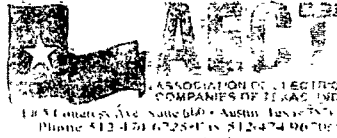
\$57,661.06

AEP TX Lobby

APPROVED  
*Julia C. Rathgeber*  
10/2/18

75% of the AECT operating budget is set aside for lobbying expenses

R# 826401  
P# 88684



1005 Congress Avenue, Suite 600, Austin, Texas 78701  
Phone 512-474-6728 • Fax 512-474-9670 • www.aect.org

September 11, 2018

Julio Reyes  
AEP Texas  
539 N Carancahua  
Corpus Christi, TX 78401

Dear Julio

AEP Texas' pro-rata assessment for the 3<sup>rd</sup> quarter of the AECT dues (July, August and September 2018) is \$88,013.03. Please make your check payable to the Association of Electric Companies of Texas, Inc., and mail it to 1005 Congress Avenue, Suite 600, Austin, Texas 78701, Attn: Julia Rathgeber, President & CEO.

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AEP Texas' 2018 Dues are as follows:

AECT Operating Budget	\$319,010.00
Regulated Market Sector Council Membership	\$12,592.50
SWLPCO Regulated Market Sector Council Membership	\$12,592.50
Sponsorships Account	\$7,857.14
2018 Total	\$352,052.14

3rd Quarter Assessment

\$88,013.03

Please call me or Jessica DeLeon at 512-474-6728 if you have any questions or need additional information.

Yours very truly,

\$27,183.51

Julia Rathgeber

AEP TX

non-lobby

APPROVED

Julia C. Rathgeber  
10/2/18

75% of the AECT operating budget is set aside for lobbying expenses

00873157



MSC 211 00873157

## AP Feeder System Cover Sheet

**DO NOT PAY**

Use this cover sheet to send documents to Accounts Payable that are related to vendor payments initiated via an electronic interface. Account Payable will process this cover sheet and related documents, and reference the vendor payment generated from the electronic interface.

The following invoice was submitted electronically to Accounts Payable.

---

Business Unit:	211
Voucher Number:	00873157
Invoice Number:	87687
Invoice Amount:	\$57,661.06
Vendor Number:	0000096469
Vendor Name:	ASSOCIATION OF ELECTRIC
Contract/PO:	
Pay Authorization:	
Submitted by:	SALAZAR,CHRISTINA M
Date Received:	06/14/2018

---

Notes:

Check Date: 06/15/2018		Check No: 3000133785	
Invoice Number	Invoice Date	PO Number	Voucher ID
87687	06/14/2018		00873157
Tuna Salazar, AEP Texas, Corpus Christi 2018 2nd Qtr-AEP TX Lobby Portion			
87688	06/14/2018		00873158
Tuna Salazar, AEP Texas, Corpus Christi 2018 2nd Qtr-AEP TX Non-Lobby			
Total Amount		Total Adjustments	Total Paid Amount
\$84,844.57		\$0.00	\$84,844.57

**THE FACE OF THIS DOCUMENT HAS A COLORED BACKGROUND - NOT A WHITE BACKGROUND**



**AEP TEXAS CENTRAL DIVISION-DIS**  
P O Box 24400  
Canton, OH 44701

CITIBANK, N.A.  
New Castle, DE 19720  
62-20/311

3000133785  
Date 06/15/2018

**\$84,844.57**

Pay

\*\*\*EIGHTY-FOUR THOUSAND EIGHT HUNDRED FORTY-FOUR AND 57 / 100 DOLLAR\*\*\*

To The  
Order Of

ASSOCIATION OF ELECTRIC  
COMPANIES OF TEXAS INC  
1005 CONGRESS AVE STE 600  
AUSTIN, TX 78701

Pay Amount \$84,844.57\*\*\*

*Julie Williams*  
Authorized Signature

**THIS DOCUMENT IS PRINTED ON WATERMARKED PAPER - HOLD TO LIGHT TO VIEW**



PH 85340  
PH 87687

May 23, 2018

Julio Reyes  
AEP Texas  
530 N. Caranchoa  
Corpus Christi, TX 78401

Dear Julio:

AEP Texas' pro-rata assessment for the 2<sup>nd</sup> quarter of the AECT dues (January, February, and March 2018) is \$88,013.03. Please make your check payable to the Association of Electric Companies of Texas, Inc. and mail it to 1005 Congress Avenue, Suite 600, Austin, Texas 78701. Attn: Julia Rathgeber, President & CEO.

This is the quarterly assessment for the total amount of AECT dues, and includes the budgeted amount for AECT operations, Advocacy Programs and our External Lobbyists. It also includes the quarterly fee for your market sector council membership(s), as well as your prorated share of the AECT sponsorship budget.

AEP Texas' 2018 Dues are as follows:

AECT Operating Budget	\$319,010.00
Regulated Market Sector Council Membership	\$12,592.50
SWEPSCO Regulated Market Sector Council Membership	\$12,592.50
Sponsorships Account	\$7,857.14
2018 Total	\$352,052.14

2<sup>nd</sup> Quarter Assessment

\$88,013.03

Please call me or Jessica DeLeon at 512 474-6725 if you have any questions or need additional information.

Yours very truly,

*Julia Rathgeber*  
Julia Rathgeber

\$57,661.06  
AEP TX  
Lobby

5/29/18  
APPROVED  
*John C. Ryan*

75% of the AECT operating budget is set aside for lobbying expenses



R# 85341

P# 87688

This is a quarterly assessment for the total amount of AECF dues and include the budgeted amount for AECF operations, Advocacy Programs and on Legislative Lobbyists. It also includes the quarterly fee for your market sector (united memberships) as well as one proposed amount of the AECF sponsorship budget.

This is the quarterly assessment for the total amount of AECF dues and include the budgeted amount for AECF operations, Advocacy Programs and on Legislative Lobbyists. It also includes the quarterly fee for your market sector (united memberships) as well as one proposed amount of the AECF sponsorship budget.

AEP Texas 2018 Dues are as follows:

AECF Operating Budget	\$319,010.00
Regulated Market Sector Council Membership	\$12,592.50
SWEPCCO Regulated Market Sector Council Membership	\$12,592.50
Sponsorships Account	\$12,592.50
Non-Lobby	\$12,592.50

# 27,183.51

AEP TX  
Non-Lobby

75% of the AECF operating budget is set aside for lobbying expenses

00863316



MSC 211 00863316

## AP Feeder System Cover Sheet

**DO NOT PAY**

Use this cover sheet to send documents to Accounts Payable that are related to vendor payments initiated via an electronic interface. Account Payable will process this cover sheet and related documents, and reference the vendor payment generated from the electronic interface.

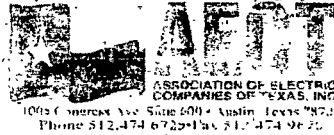
The following invoice was submitted electronically to Accounts Payable.

---

Business Unit:	211
Voucher Number:	00863316
Invoice Number:	87220
Invoice Amount:	\$57,661.06
Vendor Number:	0000096469
Vendor Name:	ASSOCIATION OF ELECTRIC
Contract/PO:	
Pay Authorization:	
Submitted by:	SALAZAR, CHRISTINA M
Date Received:	04/26/2018

---

Notes:



R# 84957  
P# 87220

January 10, 2018

Robert Black  
AEP  
919 Congress Ave. Suite 1400  
Austin, Texas 78701

Dear Robert,

AEP Texas' pro-rata assessment for the 1<sup>st</sup> quarter of the AECT dues (January, February, and March 2018) is \$88,013.03. Please make your check payable to the Association of Electric Companies of Texas, Inc. and mail it to 1005 Congress Avenue, Suite 600, Austin, Texas 78701. Attn: Julia Rathgeber, President & CEO.

This is the quarterly assessment for the total amount of AECT dues, and includes the budgeted amount for AECT operations, Advocacy Programs and our External Lobbyists. It also includes the quarterly fee for your market sector council membership(s), as well as your prorated share of the AECT sponsorship budget.

AEP Texas' 2018 Dues are as follows:

AECT Operating Budget	\$319,010.00
Regulated Market Sector Council Membership	\$12,592.50
SWEPCO Regulated Market Sector Council Membership	\$12,592.50
Sponsorships Account	\$7,857.14
2018 Total	\$352,052.14
1 <sup>st</sup> Quarter Assessment	\$88,013.03

Please call myself or Jessica DeLeon at 512 474-6725 if you have any questions or need additional information.

Yours very truly,

Julia Rathgeber

\$57,661.06  
AEP Tx Lobby

4/10/18  
APPROVED

75% of the AECT operating budget is set aside for lobbying expenses

THE FACE OF THIS DOCUMENT HAS A COLORED BACKGROUND - NOT A WHITE BACKGROUND

**AEP** **AMERICAN**  
**ELECTRIC**  
**POWER**

AEP TEXAS CENTRAL DIVISION-DIS  
P O Box 24400  
Canton, OH 44701

CITIBANK, N.A.  
New Castle DE 10720  
62-20311

3000133541  
Date 04/27/2018

**\$84,844.57**  
DOLLAR CHECK FOUR CAPS, EIGHTY-FOUR THOUSAND, EIGHT HUNDRED, FORTY-FOUR AND 57/100 DOLLAR

Pay \*\*\*\*\*EIGHTY-FOUR THOUSAND EIGHT HUNDRED FORTY-FOUR AND 57 / 100 DOLLAR\*\*\*\*\*

To The  
Order Of

ASSOCIATION OF ELECTRIC  
COMPANIES OF TEXAS INC  
1005 CONGRESS AVE STE 600  
AUSTIN, TX 78701

Pay Amount \$84,844.57\*\*\*  
*Julie Williams*  
Authorized Signature

**THIS DOCUMENT IS PRINTED ON WATERMARKED PAPER - HOLD TO LIGHT TO VIEW**

11 3000 13354 11 1:03 1100 2091: 3864798511

00849034

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MSC 211 00849034

## AP Feeder System Cover Sheet

**DO NOT PAY**

Use this cover sheet to send documents to Accounts Payable that are related to vendor payments initiated via an electronic interface. Account Payable will process this cover sheet and related documents, and reference the vendor payment generated from the electronic interface.

The following invoice was submitted electronically to Accounts Payable.

Business Unit:	211
Voucher Number:	00849034
Invoice Number:	85941
Invoice Amount:	\$57,661.06
Vendor Number:	0000096469
Vendor Name:	ASSOCIATION OF ELECTRIC
Contract/PO:	
Pay Authorization:	
Submitted by:	SALAZAR, CHRISTINA M
Date Received:	02/09/2018

Notes:

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RH 33856  
RH 85941

Neil Walker, Chair • Rene Wicks, Vice Chair • Julia Rathgeber, President & CEO • Ken Gaffney, Vice President and Corporate Secretary

November 7, 2017

Judith Talavera  
AEP  
539 N. Carancahua  
17th Floor  
Corpus Christi, TX 78401

Dear Judith:

AEP Texas' pro-rata assessment for the 4<sup>th</sup> quarter of the AECT dues (October, November, December 2017) is \$88,013.03. Please make your check payable to the Association of Electric Companies of Texas, Inc., and mail it to 1005 Congress Avenue, Suite 600, Austin, Texas 78701, Attn: Julia Rathgeber, President & CEO.

This is the quarterly assessment for the total amount of AECT dues, and includes the budgeted amount for AECT operations, Advocacy Programs and our External Lobbyists. It also includes the quarterly fee for your market sector council membership(s), as well as your prorated share of the AECT sponsorship budget.

AEP Texas' 2017 Dues are as follows:

AECT Operating Budget	\$319,010.00
Regulated Market Sector Council Membership	\$12,592.50
SWEPSCO Regulated Market Sector Council Membership	\$12,592.50
Sponsorships Account	\$7,857.14
2017 Total	\$352,052.14
	(\$264,039.10)

4th Quarter Assessment

\$88,013.04

Please call myself or Jessica DeLeon at 512 474-4774 if you have any questions or need additional information.

Yours very truly,

Julia Rathgeber

*For*  
**APPROVED**  
1/31/18  
Members

75% of the AECT operating budget is set aside for lobbying expenses

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R# 83857

R# 85942

Nat Walker, Chair • Anna Hinder, Vice Chair • Julia Ruthgebet, President & CEO • Bret Hoffman, Vice President and Corporate Secretary

November 7, 2017

Julith Lalavera  
MFP  
530 N. Carancahita  
17th Floor  
Corpus Christi, TX 78401

Dear Julith:

AEP Texas' pre-rata assessment for the 4<sup>th</sup> quarter of the AECT dues (October, November, December 2017) is \$88,013.03. Please make your check payable to the Association of Electric Companies of Texas, Inc., and mail it to 1005 Congress Avenue, Suite 600, Austin, Texas 78701, Attn: Julia Ruthgebet, President & CEO.

This is the quarterly assessment for the total amount of AECT dues, and includes the budgeted amount for AECT operations, Advocacy Programs and our External Lobbyists. It also includes the quarterly fee for your market sector council membership(s), as well as your prorated share of the AECT sponsorship budget.

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SWEPCC Regulated Market Sector Council Membership	\$12,592.50
Sponsorships Account	\$7,857.14
2017 Total	\$352,052.14

AEP TX  
r/r - lobby - \$152,039.10

4th Quarter Assessment

\$88,013.04

Please call myself or Jessica DeLeon at 512.474.1111 if you have any questions or need additional information.

Yours very truly,

*Julia Ruthgebet*  
Julia Ruthgebet

*1/31/18*  
*MEMORANDUM*

75% of the AECT operating budget is set aside for lobbying expenses

\\oh0ca003\ocr\prd\ocrff\jobs\miscbar.fof\00586609.bat\images\00041.tif

Check Date 02/12/2018		Check No. 3000133036				
Invoice Number	Invoice Date	PO Number	Voucher ID	Gross Amount	Adjustments	Paid Amount
85941	02/09/2018		00849034	57,661.06	0.00	57,661.06
Tina Salazar AEP Texas, Corpus Christi AEP TX Lobby Portion						
85942	02/09/2018		00849035	27,183.51	0.00	27,183.51
Tina Salazar, AEP Texas, Corpus Christi AEP TX non-lobby portion (2017 4Q)						

Vendor Number	Vendor Name		AEP Texas Central Division-Dis P O Box 24400 Canton, OH 44701 877 286-2729
0000096469	ASSOCIATION OF ELECTRIC		
Total Amount	Total Adjustments	Total Paid Amount	
\$84,844.57	\$0.00	\$84,844.57	

THE FACE OF THIS DOCUMENT HAS A COLORED BACKGROUND - NOT A WHITE BACKGROUND



AEP TEXAS CENTRAL DIVISION-DIS  
P O Box 24400  
Canton, OH 44701

CITIBANK, N.A.  
New Castle, DE 19720  
62-20/311

3000133036  
Date 02/12/2018

**\$84,844.57**

Pay \*\*\*EIGHTY-FOUR THOUSAND EIGHT HUNDRED FORTY-FOUR AND 57/100 DOLLAR\*\*\*\*

To The  
Order Of

ASSOCIATION OF ELECTRIC  
COMPANIES OF TEXAS INC  
1005 CONGRESS AVE STE 600  
AUSTIN, TX 78701

Pay Amount \$84,844.57\*\*\*

*Julie Williams*  
Authorized Signature

THIS DOCUMENT IS PRINTED ON WATERMARKED PAPER - HOLD TO LIGHT TO VIEW

⑈ 3000133036 ⑈ ⑆031100209⑆ 38647985⑈



**SOAH DOCKET NO. 473-19-4421  
PUC DOCKET NO. 49494**

**AEP TEXAS INC.'S RESPONSE TO OFFICE OF PUBLIC UTILITY COUNSEL'S  
THIRD REQUEST FOR INFORMATION**

**Question No. OPUC 3-20:**

Please provide any invoices supporting the expenses for dues for the Edison Electric Institute ("EEI"), shown on Schedules II-D-2.6a for both divisions. Are any portions of the EEI costs included as below-the-line?

**Response No. OPUC 3-20:**

Please refer to the Company's response to Staff's 3rd, Q. 3-7 (Staff 3-7 Attachment 1 .pdf) for invoices supporting the expenses for dues to the Edison Electric Institute as shown on Schedules II-D-2.6a. Yes, amounts considered attributable to donations and civic or political activity are recorded below-the-line. See Staff 3-7 Attachment 2 (EEI Dues Worksheet).xlsx for detail of these amounts.

Prepared By: Tiffany A. Powell Day

Title: Regulatory Acctg Case Mgr

Sponsored By: Randall W. Hamlett

Title: Dir Regulatory Acctg Svcs

Sponsored By: Gilbert Hughes

Title: Dir Regulatory Svcs

**SOAH DOCKET NO. 473-19-4421  
PUC DOCKET NO. 49494**

**AEP TEXAS INC.'S RESPONSE TO OFFICE OF PUBLIC UTILITY COUNSEL'S  
THIRD REQUEST FOR INFORMATION**

**Question No. OPUC 3-21:**

Please explain why the parent company should allocate the dues paid to the American Coalition for Clean Coal to a wires-only company such as AEP Texas. (Schedules II-D-2.6a AEPSC for both divisions)

**Response No. OPUC 3-21:**

The dues paid to the American Coalition for Clean Coal was recorded as an AEPSC corporate contribution, and all such corporate contributions are allocated to all AEP affiliates as they are for the benefit of the entire organization. Any dues paid to this organization, which got billed to AEP Texas in cost of service accounts, were removed from the revenue requirement via a proforma adjustment. The amounts in Schedule II-D-2.6a AEPSC for both divisions was recorded to a below the line account and, therefore, had no impact on cost of service.

Prepared By: Brian J. Frantz

Title: Dir Accounting

Sponsored By: Brian J. Frantz

Title: Dir Accounting

**SOAH DOCKET NO. 473-19-4421  
PUC DOCKET NO. 49494**

**AEP TEXAS INC.'S RESPONSE TO OFFICE OF PUBLIC UTILITY COUNSEL'S  
THIRD REQUEST FOR INFORMATION**

**Question No. OPUC 3-22:**

Please explain why AEP Texas classifies the majority of costs of the North American Transmission Forum (Schedules II-D-2.6a AEPSC for both divisions) to the distribution function instead of classifying all of the costs to the transmission function.

**Response No. OPUC 3-22:**

These costs were allocated to multiple AEP affiliates, including transmission and distribution functions. Upon further examination of these costs, these should have been allocated to only the transmission functions of the AEP affiliates.

Prepared By: Brian J. Frantz

Title: Dir Accounting

Sponsored By: Brian J. Frantz

Title: Dir Accounting

**SOAH DOCKET NO. 473-19-4421  
PUC DOCKET NO. 49494**

**AEP TEXAS INC.'S RESPONSE TO OFFICE OF PUBLIC UTILITY COUNSEL'S  
THIRD REQUEST FOR INFORMATION**

**Question No. OPUC 3-23:**

Referencing Schedules II-D-2.6b AEPSC for both divisions, please provide invoices supporting the expenses for AEPSC payments for dues to the following:

- a. The U.S. Chamber of Commerce;
- b. The National Association of Manufacturers;
- c. The Business Roundtable;
- d. The World Resources Institute

Did AEP Texas assign any costs below-the-line for these organizations? If so, how much (by organization and division)?

**Response No. OPUC 3-23:**

Please see OPUC 3-23 Attachment 1 for invoices supporting the U.S. Chamber of Commerce, National Association of Manufacturers, and Business Roundtable expenses. All of the expenses, for these invoices, noted on Schedules II-D-2.6b AEPSC for both divisions were recorded to below-the-line account (4264).

Please see OPUC 3-23 Attachment 2 for invoices supporting the World Resources Institute expenses. All of the expenses for these invoices were recorded to FERC account 9302.

Prepared By: Brian J. Frantz

Title: Dir Accounting

Sponsored By: Brian J. Frantz

Title: Dir Accounting



MSC 103 02181878

## **AP Feeder System Cover Sheet**

**DO NOT PAY**

Use this cover sheet to send documents to Accounts Payable that are related to vendor payments initiated via an electronic interface. Account Payable will process this cover sheet and related documents, and reference the vendor payment generated from the electronic interface.

The following invoice was submitted electronically to Accounts Payable.

Business Unit:	103
Voucher Number:	02181878
Invoice Number:	85732
Invoice Amount:	\$255,000.00
Vendor Number:	0000015728
Vendor Name:	BUSINESS ROUNDTABLE
Contract/PO:	
Pay Authorization:	
Submitted by:	HARPER,VIRGINIA L
Date Received:	01/29/2018

Notes:

R- 83651  
P- 85732  
P- 85734  
**BR Business Roundtable**

SOAH Docket No. 473-19-4421  
PUC Docket No. 49494  
OPUC's 3rd, Q. # OPUC 3-23  
Attachment 1  
Page 2 of 6

300 New Jersey Avenue, NW  
Suite 800  
Washington, DC 20001  
Tel: (202) 872-1260  
www.brt.org

## 2018 Annual Dues Invoice

Date: January 23, 2018  
Invoice No.: 18 - C70F3D5C  
To: Mr. Nicholas K. Akins  
Chairman, President and Chief Executive Officer  
American Electric Power  
One Riverside Plaza  
Columbus, OH 43215-2372

APPROVED  
*NKA*  
1-29-18

<b>2018 Annual Dues</b>	<b>\$ 300,000.</b>
85% of the membership dues on this invoice is attributable to lobbying expenditures and is not deductible for Federal income tax purposes.	
Business Roundtable is formed under section 501(c)(6) of the tax code. Federal Employer Identification Number is: 23-7236607.	

### PLEASE NOTE NEW BANK INFORMATION:

**Check:**  
Please make check payable to:  
Business Roundtable

**Mail to:**  
Business Roundtable  
300 New Jersey Avenue, NW  
Suite 800  
Washington, DC 20001

### Wire and ACH Transfer:

Name of Bank: JP Morgan Chase Bank  
Bank Location: 500 Stanton Christiana Rd  
Newark, DE 19713  
Bank Telephone: (888) 207-6734

Account Number: 559770685  
ABA Number: 021 000 021  
Swift: CHASUS33

Please send email inquiries about this invoice to: [accounting@brt.org](mailto:accounting@brt.org)



MSC 103 02173090

## **AP Feeder System Cover Sheet**

**DO NOT PAY**

Use this cover sheet to send documents to Accounts Payable that are related to vendor payments initiated via an electronic interface. Account Payable will process this cover sheet and related documents, and reference the vendor payment generated from the electronic interface.

The following invoice was submitted electronically to Accounts Payable.

Business Unit:	103
Voucher Number:	02173090
Invoice Number:	85445
Invoice Amount:	\$36,404.68
Vendor Number:	0000044361
Vendor Name:	NATIONAL ASSOCIATION OF MANUFA
Contract/PO:	
Pay Authorization:	
Submitted by:	HARPER,VIRGINIA L
Date Received:	01/04/2018

Notes:

R-83234  
P-85442 P 85445



<sup>N</sup>  
**Manufacturers**

www.nam.org

SOAH Docket No. 473-19-4421

PUC Docket No. 49494

OPUC's 3rd, Q. # OPUC 3-23

Attachment 1

Page 4 of 6

**Send remittance to:**

National Association of Manufacturers

Attn: Accounting Department

733 10<sup>th</sup> Street, NW, Suite 700

Washington, DC 20001

(202) 637-3029, fax (202) 637-3411

Tax I.D. No. 13-1084330

**Or Pay by ACH:**

**Bank Name:** SunTrust Bank

**Bank Address:** 1445 New York Ave., NW

Washington, DC 20005

**Bank ABA #:** 061000104

**Account Name:** National Association of  
Manufacturers

**Account Number:** 206555210

**Bill to:** Mr. Charles R. Patton  
Executive Vice President - External Affairs  
American Electric Power  
One Riverside Plaza  
Columbus, OH 43215-2355

## MEMBERSHIP INVESTMENT

Date	Invoice No.	Description	Amount
December 18, 2017	# 233007-18	NAM 2018 Membership Dues Investment January 2018 – December 2018	\$140,018

In compliance with the Omnibus Reconciliation of 1993, 74% of your payment may be deducted as a business expense and not as a charitable contribution. The NAM estimates that 26% of your payment is not deductible due to lobbying. Further information on this law should be obtained from your tax advisor.





MSC 103 02184668

## **AP Feeder System Cover Sheet**

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The following invoice was submitted electronically to Accounts Payable.

Business Unit:	103
Voucher Number:	02184668
Invoice Number:	85801
Invoice Amount:	\$100,000.00
Vendor Number:	0000061535
Vendor Name:	UNITED STATES CHAMBER OF COMME
Contract/PO:	
Pay Authorization:	
Submitted by:	HARPER,VIRGINIA L
Date Received:	02/02/2018

Notes:

**U.S. Chamber of Commerce**

1615 H Street, NW

Washington, D.C. 20062

Phone: (202) 463-5702

Fax: (202) 463-3137

www.uschamber.com

<b>American Electric Power Company, Inc.</b>		Invoice Number:	1688-012218
Mr. Anthony P. Kavanagh		Invoice Date:	January 22, 2018
Senior Vice President, Governmental Affairs		P.O. Number:	
American Electric Power Company, Inc.		Vendor Number:	
801 Pennsylvania Avenue, NW		Due Date:	Payable Upon Receipt
Suite 320			
Washington, DC 20004			

U.S. Chamber of Commerce	Amount
<i>Please make checks payable to: <u>U.S. Chamber of Commerce</u></i>	
<b>President's Advisory Group Membership and Global Energy Institute Leadership Council</b>	<b>\$400,000</b>
Account Holder: U.S. Chamber of Commerce	
Bank: PNCBank, National Association	
Pittsburgh, PA 15222	
Account #: 5501371523	
ABA or Routing Number (For Wires Only): 031000053	
ABA or Routing Number (For ACH Only): 054000030	
SWIFT Code (For Incoming International Wires): PNCCUS33	
Tax ID #: 53-0045720	
<b>TOTAL AMOUNT DUE</b>	<b>\$400,000</b>

Please remit payment to the attention of Tom Donohue. The U.S. Chamber's FedEx account number is 2142-5384-4 and UPS account number is 286-981.

Contributions to the U.S. Chamber are not tax deductible as a charitable contribution. For 2018, 25% of contributions relate to lobbying and are not tax deductible as a business expense; 75% may be deductible as a business expense. The U.S. Chamber does not solicit or accept funds earmarked for political purposes.

The U.S. Chamber is a 501(c)(6) organization

☐ AMEX ☐ MC ☐ VISA ☐ DISCOVER

Card Holders Name:

Card Number:

Signature:

Expiration Date:

*If paying by credit card please fax to (202) 463-3137*

Please contact (202) 463-5702 with any questions.



MSC 103 02173251

## **AP Feeder System Cover Sheet**

**DO NOT PAY**

Use this cover sheet to send documents to Accounts Payable that are related to vendor payments initiated via an electronic interface. Account Payable will process this cover sheet and related documents, and reference the vendor payment generated from the electronic interface.

The following invoice was submitted electronically to Accounts Payable.

Business Unit:	103
Voucher Number:	02173251
Invoice Number:	85463
Invoice Amount:	\$75,000.00
Vendor Number:	0000318820
Vendor Name:	WORLD RESOURCES INSTITUTE
Contract/PO:	
Pay Authorization:	
Submitted by:	HARPER,VIRGINIA L
Date Received:	01/05/2018

Notes:

**WORLD  
RESOURCES  
INSTITUTE**

June 30, 2017

1

10 G Street, NE, #800  
Washington, DC 20002  
Phone: 202-729-7648

American Electric Power  
Attn.: Bruce Evans  
801 Pennsylvania Ave NW # 320  
Washington, D C.

**DESCRIPTION**

**AMOUNT**

**Clean Power Council for Customers & Utilities: Annual  
Membership Fee (September 1, 2017—August 31, 2018)**

\$

75,000 00

\$

75,000.00

**Payment Detail**

**TOTAL \$**

**75,000.00**

Account Name: World Resources Institute  
Account Number: 1000186546379  
Bank Name: SunTrust Bank  
Bank Address: 1445 New York Avenue, N W. Washington, D C 20005  
ABA (Domestic Only): 061000104  
Swift Code: SNTRUS3A

*By check to the attention of.*  
Don Spencer, Director of Grants and Contracts

Payable by August 15, 2017



MSC 103 02311235

## AP Feeder System Cover Sheet

**DO NOT PAY**

Use this cover sheet to send documents to Accounts Payable that are related to vendor payments initiated via an electronic interface. Account Payable will process this cover sheet and related documents, and reference the vendor payment generated from the electronic interface.

The following invoice was submitted electronically to Accounts Payable.

Business Unit:	103
Voucher Number:	02311235
Invoice Number:	88652
Invoice Amount:	\$75,000.00
Vendor Number:	0000318820
Vendor Name:	WORLD RESOURCES INSTITUTE
Contract/PO:	
Pay Authorization:	
Submitted by:	HARPER,VIRGINIA L
Date Received:	11/02/2018

Notes:

R-86374 P-88652

**WORLD  
RESOURCES  
INSTITUTE**

**DATE:** October 31, 2018

10 G Street, NE, #800  
Washington, DC 20002  
Phone: 202-729-7648

**BILL TO:** American Electric Power  
Bruce Evans  
801 Pennsylvania Ave NW #320,  
Washington DC

DESCRIPTION	AMOUNT-USD
Year 2 support (2018 - 2019 dues) for Special Clean Power Council for Customers and Utilities. WRI anticipates no reporting as part of this award.	75,000.00

SUBTOTAL	75,000.00
TOTAL	75,000.00

**Payment Detail**

Account Name: World Resources Institute  
Account Number: 1000186546379  
Bank Name: SunTrust Bank  
Bank Address: 1445 New York Avenue, N.W. Washington, D.C. 20005  
ABA (Domestic Only): 061000104  
Swift Code: SNTRUS3A  
Bank Official: Brenda Payton, 202-879-6168

By check to the attention of:  
Don Spencer, Director of Grants and Contracts

**SOAH DOCKET NO. 473-19-4421  
PUC DOCKET NO. 49494**

**AEP TEXAS INC.'S RESPONSE TO OFFICE OF PUBLIC UTILITY COUNSEL'S  
THIRD REQUEST FOR INFORMATION**

**Question No. OPUC 3-24:**

Please explain why Political Membership dues are subtracted from allowable expenses on Schedule II-2.6 Dues Summary AEPSC in the AEP Texas Central Division. Please explain why the dues were not subtracted from allowable expenses on Schedule II-2.6 Dues Summary AEPSC in the AEP Texas North Division and the dues were not subtracted from allowable expenses on Schedule II-2.6 Dues Summary in the AEP Texas Central Division (the schedule reports no political dues directly spent by the Company in the AEP Texas North Division).

**Response No. OPUC 3-24:**

The political membership dues noted on Schedule II-2.6 Dues Summary AEPSC were subtracted from allowable expenses on both the North and Central Division. Upon further review of the Schedules, it was noted that the account on line 44 of Schedule II-2.6 for Central Division, the incorrect account was presented for this political membership due. The account should be 4265, as this membership was recorded below the line and would not impact cost of service amounts.

Prepared By: Lauri S. White

Title: Regulatory Analysis & Case Mgr

Sponsored By: Gilbert Hughes

Title: Dir Regulatory Svcs

Sponsored By: Brian J. Frantz

Title: Dir Accounting

**SOAH DOCKET NO. 473-19-4421**  
**PUC DOCKET NO. 49494**

**AEP TEXAS INC.'S RESPONSE TO OFFICE OF PUBLIC UTILITY COUNSEL'S**  
**THIRD REQUEST FOR INFORMATION**

**Question No. OPUC 3-25:**

Referencing Schedule II-D-2.4 (Advertising):

- a. For each individual advertising program in excess of \$25,000 (total Company) in Account 930.1, please identify:
  - i. the amount of money spent by division;
  - ii. the costs by media (i.e., print, radio, television, and internet); and
  - iii. samples of individual advertisements.
- b. Were any advertising costs allocated to AEP Texas by AEPSC? If so, please provide a narrative description of why the costs were allocated to AEP Texas, including where the advertising dollars were spent and why ratepayers should pay for them.

**Response No. OPUC 3-25:**

- a. Please see table below for a listing of individual advertising charges in excess of \$25,000 (total Company) included in Account 930. the amount of money spent by division, and the costs by media or type.

Vendor	North Division	Central Division	Total	Type
BELLOMY RESEARCH INC	4,532	20,648	25,180	Residential Online Community Research Survey
BERRY NETWORK INC	9,731	20,252	29,983	Print- Yellow Pages Advertisement
CORPUS CHRISTI HOOKS BASEBALL CLUB	6,843	22,908	29,750	Billboard- Corporate Branding
MARKET STRATEGIES INTERNATIONAL INC	6,300	28,700	35,000	National Benchmarking/Brand Loyalty Survey
MSR GROUP	9,881	45,013	54,894	Reputational Customer Survey
NATIONAL THEATRE FOR CHILDREN	12,563	37,688	50,250	Safety Communications
<b>Grand Total</b>	<b>49,849</b>	<b>175,208</b>	<b>225,057</b>	

- b. Please refer to the Company's response to Cities 7-8 for samples of individual advertisements for charges from Berry Network Inc., Corpus Christi Hooks Baseball Club, and National Theatre for Children. Charges from Bellomy Research, Market Strategies International and MSR Group relate to surveys. As such, no samples of advertisements are available.
- c. Yes, advertising costs were allocated to AEP Texas by AEPSC. As described in the direct testimony of Company witness Gilbert Hughes, AEPSC Corporate Communications provides a variety of communications resources and services to support the communications and business activities of both the central organization and the company's utility operating subsidiaries, including AEP Texas. AEPSC Corporate Communications develops corporate-wide advertising used to deliver key messages about AEP's operating companies' commitment to customers and communities, covering topics that include education, technology and innovation, community



support and economic development. AEPSC also develops public safety advertising to increase awareness of overhead and underground safety precautions and coordinates corporate-wide advertising sponsorships, as needed. These services are provided on a system-wide basis because they are not exclusive to AEP Texas. Further, by offering such services on a centralized, system-wide basis, AEP achieves economies of scale and scope by sharing common costs across multiple subsidiaries, reducing overlap, and avoiding duplication in staffing, as addressed by Company witness Brian Frantz. Over half of the AEPSC advertising costs allocated to AEP Texas are labor-related expenses.

Prepared By: Lauri S. White

Title: Regulatory Analysis & Case Mgr

Sponsored By: Gilbert Hughes

Title: Dir Regulatory Svcs

Sponsored By: Brian J. Frantz

Title: Dir Accounting