



Control Number: 50892



Item Number: 1

Addendum StartPage: 0

PUC DOCKET NO. **50892**

**APPLICATION OF AEP TEXAS, INC.
TO ADJUST ENERGY EFFICIENCY
COST RECOVERY FACTOR AND
RELATED RELIEF**

§
§
§
§

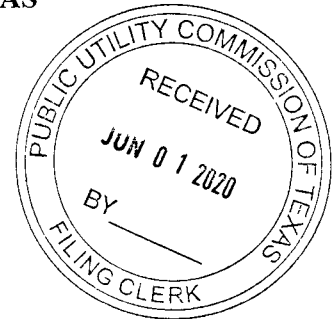
PUBLIC UTILITY COMMISSION

OF TEXAS

AEP TEXAS INC.'S APPLICATION

JUNE 1, 2020

TABLE OF CONTENTS



<u>SECTION</u>	<u>FILE NAME</u>	<u>PAGE</u>
Application	2020 AEPTX EECRF Pkg.pdf	2
Attachment A	2020 AEPTX EECRF Pkg.pdf	10
Attachment B	2020 AEPTX EECRF Pkg.pdf	11
Direct Testimony & Exhibits of Robert Cavazos	2020 AEPTX EECRF Pkg.pdf	29
Direct Testimony of Pamela D. Osterloh	2020 AEPTX EECRF Pkg.pdf	134
Direct Testimony & Exhibits of Brian T. Lysiak	2020 AEPTX EECRF Pkg.pdf	162
Direct Testimony of Jennifer L. Jackson	2020 AEPTX EECRF Pkg.pdf	178
Schedules A-S	2020 AEPTX EECRF Pkg.pdf	204

Excel files provided electronically on the PUC Interchange

- | | |
|---|--|
| <ol style="list-style-type: none"> 1. AEP Texas EECRF - Sch A-B-J-K-M-N-O-P-R Final 2. AEP Texas EECRF - Schedule A Page 2 Final 3. AEP Texas EECRF - Central Division Schedule B Page 2 Final 4. AEP Texas EECRF - North Division Schedule B Page 2 Final 5. AEP Texas EECRF - AEP TX Combined SchC-E-G-H-I-Q-WPA-WPC-WPE-WPG 2021 Rates Final 6. AEP Texas EECRF - Central Division SchC-E-G-H-I-Q-WPA-WPC-WPE-WPG 2021 Rates Final | <ol style="list-style-type: none"> 7. AEP Texas EECRF - North Division SchC-E-G-H-I-Q-WPA-WPC-WPE-WPG 2021 Rates Final 8. AEP Texas EECRF - Central Division Schedule K Final 9. AEP Texas EECRF - North Division Schedule K Final 10. WP 2021 EECRF ID Notice (EE Goal Support) 11. WP 2021 EECRF ID Notices 12. WP Frontier Bonus Calculator Template 10.0 PY2019 Central Final clean 13. WP Frontier Bonus Calculator Template 10.0 PY2019 North Final clean |
|---|--|

PUC DOCKET NO. _____

APPLICATION OF AEP TEXAS INC. TO	§	PUBLIC UTILITY COMMISSION
ADJUST ENERGY EFFICIENCY COST	§	
RECOVERY FACTORS AND RELATED	§	OF TEXAS
RELIEF	§	

AEP TEXAS INC.'S APPLICATION

TO THE HONORABLE PUBLIC UTILITY COMMISSION OF TEXAS:

AEP Texas Inc. (AEP Texas or Applicant) files its Application to Adjust Energy Efficiency Cost Recovery Factors and Related Relief in accordance with Public Utility Regulatory Act¹ (PURA) § 39.905 and 16 Tex. Admin. Code §§ 25.181–.182 (TAC). In support thereof, AEP Texas would show the following:

I. Applicant

AEP Texas is a transmission and distribution (T&D) utility that provides T&D service across a service territory covering all or part of 92 counties in south and west Texas. AEP Texas' business address is 539 North Carancahua Street, Corpus Christi, Texas 78401.

II. Applicant's Authorized Representatives

AEP Texas' authorized business representative is:

Jennifer Frederick
American Electric Power Service Corporation
400 W. 15th Street, Suite 1520
Austin, Texas 78701
512.481.4573 (voice)
512.481.4591 (facsimile)
Email: jjfrederick@aep.com

¹ PURA is codified at Tex. Util. Code Ann. §§ 11.001–66.016.

AEP Texas' authorized legal representatives are:

Melissa Gage
American Electric Power Service Corporation
400 West 15th Street, Suite 1520
Austin, Texas 78701
512.481.3320 (voice)
512.481.4591 (facsimile)
Email: magage@aep.com

Patrick Pearsall
Duggins Wren Mann & Romero, LLP
P.O. Box 1149
Austin, Texas 78767
(512) 744-9300 (voice)
(512) 744-9399 (fax)
Email: ppersall@dwmrlaw.com

AEP Texas requests that all information, pleadings, and other documents filed in this proceeding be served on the business and legal representatives identified above.

III. Jurisdiction

The Public Utility Commission of Texas (Commission) has jurisdiction over AEP Texas' application to adjust its energy efficiency cost recovery factor (EECRF) under PURA § 39.905 and 16 TAC § 25.182.

IV. Affected Persons

This filing affects all retail electric providers (REPs) serving end-use retail electric customers in AEP Texas' certificated service territory and all retail electric customers of those REPs. AEP Texas is connected to and provides T&D service to more than a million end users of electricity in its service territory, all of whom are customers of REPs. Those end users of electricity who take service at or below 69,000 volts, with the exception of industrial distribution customers who filed a notice of intent pursuant to 16 TAC § 25.181(u) and lighting customers, for whom no energy efficiency programs are available, may be affected by the relief sought by AEP Texas, depending on the actions taken by the REPs who provide them electricity.

V. Background

In Docket No. 46050, *Application of AEP Texas Central Company, AEP Texas North Company, and AEP Utilities, Inc. for Approval of Merger*, AEP Texas Central Company and AEP Texas North Company sought and received approval from the Commission to merge into their parent company, now called AEP Texas. The Commission's order approving the merger established the central and north divisions within the merged utility, which continued to maintain separate rates, riders, and tariff manuals for the central and north divisions.²

In Docket No. 49592,³ AEP Texas' most recent EECRF proceeding, the Commission approved a total energy-efficiency revenue requirement for AEP Texas of \$20,037,166 (\$16,368,445 for the central division and \$3,668,721 for the north division). Specifically, the Commission authorized AEP Texas to adjust its EECRFs to recover \$11,156,764 (\$8,955,636 for the central division and \$2,201,128 for the north division) in 2020 for energy efficiency costs in excess of that recovered through base rates. AEP Texas' approved EECRFs for the 2020 program year included the following costs:

- forecasted energy-efficiency costs of \$8,775,256 (\$6,920,539 for the central division and \$1,854,717 for the north division);
- \$215,599 (\$183,267 for the central division and \$32,332 for the north division) for projected Evaluation, Measurement, and Verification (EM&V);
- \$575,978 returned to customers (\$404,302 for the central division and \$171,676 for the north division) for AEP Texas' divisions' net over-recoveries of program year 2018 energy-efficiency costs, including interest;
- \$2,726,200 for AEP Texas' performance bonus achieved by its 2018 energy efficiency results (\$2,243,583 for the central division and \$482,617 for the north division); and

² *Application of AEP Texas Central Company, AEP Texas North Company, and AEP Utilities, Inc. for Approval of Merger*, Docket No. 46050, Final Order (Dec. 12, 2016).

³ *Application of AEP Texas Inc. To Adjust Energy Efficiency Cost Recovery Factor (EECRF) and Related Relief*, Docket No. 49592, Final Order (Dec. 16, 2019).

- \$15,686 (\$12,549 for the central division and \$3,137 for the north division) for municipal rate-case expenses incurred in Docket No. 48422.⁴

On May 1, 2019, in Docket No. 49494, AEP Texas filed an application seeking authority to adjust its base rates. As part of that application, AEP Texas requested consolidation of its central and north divisions' rates and tariffs, and the removal of all energy-efficiency costs in base rates consistent with 16 TAC § 25.182(d)(4), which states that base rates "shall not be set to recover energy efficiency costs."⁵ The Commission approved AEP Texas' requests, effectively authorizing AEP Texas to transition from base-rate, divisional recovery of energy-efficiency costs to consolidated recovery under a single, combined EECRF.⁶ Although the Commission approved the removal of energy efficiency costs from base rates, AEP Texas' 2019 base-rate revenues included energy efficiency costs. Consequently, the recognition of 2019 base-rate revenues is necessary to evaluate the 2019 over/under recovery amount to be included in the proposed 2021 AEP Texas Rider EECRF presented below.

VI. Request to Adjust the EECRF

In accordance with the final order in Docket No. 49494, this Application: (1) seeks approval to combine the energy efficiency riders from the central and north divisions into one AEP Texas Rider EECRF; and (2) seeks to recover the energy efficiency costs removed from base rates through the proposed 2021 AEP Texas Rider EECRF. In particular, AEP Texas requests the authority to update its EECRF to adjust the cost recovery factors for energy efficiency to collect \$20,531,462 in 2021 to reflect the following components:

⁴ *Application of AEP Texas, Inc. to Adjust its Energy Efficiency Cost Recovery Factors and Related Relief*, Final Order (Nov. 8, 2018).

⁵ *Application of AEP Texas Inc. For Authority to Change Rates*, Docket No. 49494, Final Order at Findings of Fact 8 and 75-83 (Apr. 6, 2020).

⁶ *Id.* at Findings of Fact 83 and 98, and Conclusions of Law 11 and 19.

- 1) recovery of \$17,747,659 in forecasted 2021 energy efficiency program expenditures;
- 2) return to customers the amount of \$948,163 to account for the over-recovery of actual energy efficiency costs for 2019 (includes interest and recovery of 2018 EM&V costs);
- 3) recovery of \$3,475,676 representing AEP Texas' earned performance bonus for achieving demand and energy savings that exceeded its minimum goals to be achieved in 2019;
- 4) recovery of \$44,303 representing 2019 EECRF proceeding expenses incurred in Docket No. 49592 by AEP Texas and by municipalities as authorized by 16 TAC § 25.182(d)(3)(B); and
- 5) recovery of \$211,988 for AEP Texas' share of the EM&V costs to evaluate program year 2020.

VII. Adjusted EECRF Cost Recovery Factors for 2021

AEP Texas is requesting approval of its proposed EECRF cost recovery factors. The proposed adjusted EECRF factors by EECRF rate class are as follows:

AEP Texas		
Rate Class	Proposed kWh Factor	Billing Unit Per Rate
Residential	\$0.000937	kWh
Secondary ≤ 10 kW	\$0.000625	kWh
Secondary > 10 kW	\$0.000796	kWh
Primary	\$0.000308	kWh
Transmission	(\$0.000221)	kW

The adjusted Schedule EECRF containing these cost recovery factors for 2021 is attached hereto as Attachment A.

VIII. Testimony and Schedules Supporting Adjusted 2021 EECRF

Accompanying this application are the direct testimonies of Robert Cavazos, Pamela D. Osterloh, Brian T. Lysiak, and Jennifer L. Jackson; Schedules A through S, which support the relief sought by Applicant; and workpapers supporting the testimony and schedules. The

evidence sponsored by Mr. Cavazos, Ms. Osterloh, Mr. Lysiak, and Ms. Jackson fully supports the relief sought by AEP Texas for 2021 pursuant to PURA §39.905 and 16 TAC § 25.182.

IX. Request for Protective Order

Schedule J contains a listing of all Energy Efficiency Service Providers (EESPs) who received incentive funds and a listing of EESPs who received more than five percent of incentive funds for 2019 along with their contracts with AEP Texas. Pursuant to 16 TAC § 25.182(d)(10)(H) and (K), such information may be provided and treated as confidential. Accordingly, AEP Texas requests entry of the standard Protective Order provided as Attachment B hereto.

X. Notice

AEP Texas proposes to provide notice by providing a copy of this application by U.S. mail, postage prepaid, to all parties to AEP Texas' most recently completed base-rate case (Docket No. 49494), AEP Texas' last EECRF case (Docket No. 49592), the Texas Department of Housing and Community Affairs, and all REPs in Texas.

XI. Proposed Schedule

AEP Texas proposes the following schedule for this proceeding:

Staff Approval of Notice	June 8, 2020
Notice Completed	June 15, 2020
Proof of Notice	June 19, 2020
Intervention Deadline	July 3, 2020
Request for a Hearing	July 3, 2020
	<u>If No Hearing Requested</u>
Staff Recommendation	July 20, 2020
Parties' Proposed Order	July 27, 2020

	<u>If Hearing Requested</u>
End of discovery on AEP Texas Direct	July 3, 2020
Deadline for Intervenor Direct	July 6, 2020
Objections to AEP Texas and Intervenor Direct	July 13, 2020
Deadline for Staff Direct	July 13, 2020
End of Discovery on Intervenor Direct	July 13, 2020
End of Discovery on Staff Direct	July 20, 2020
Replies to Objections to AEP Texas and Intervenor Direct	July 20, 2020
Objections to Staff Direct	July 20, 2020
Discovery Responses on Intervenor Direct	July 20, 2020
Deadline for AEP Texas Rebuttal and Cross-Rebuttal	July 24, 2020
Discovery Responses on Staff Direct	July 24, 2020
Hearing on the Merits	July 31, 2020

XII. Conclusion and Prayer for Relief

WHEREFORE, PREMISES CONSIDERED, AEP Texas prays that the Commission:

- (i) approve the proposed Protective Order;
- (ii) approve AEP Texas' proposed notice and method of providing notice;
- (iii) approve AEP Texas' proposed tariff schedule;
- (iv) authorize AEP Texas to begin applying the adjusted Schedule EECRFs as of March 1, 2021, attached hereto as Attachment A;
- (v) grant AEP Texas' application; and
- (vi) grant such other and further relief to which AEP Texas may show itself justly entitled.

Dated: June 1, 2020

RESPECTFULLY SUBMITTED,

Melissa Gage
400 West 15th Street, Suite 1520
Austin, Texas 78701
State Bar. No. 24063949
Email: magage@aep.com
**AMERICAN ELECTRIC POWER SERVICE
CORPORATION**

Patrick Pearsall
State Bar No. 24047492
P.O. Box 1149
Austin, Texas 78767
(512) 744-9300
(512) 744-9399 (fax)
Email: ppersall@dwmrlaw.com
DUGGINS WREN MANN & ROMERO, LLP

By: 
Patrick Pearsall

ATTORNEYS FOR AEP TEXAS INC.

Applicable: Certified Service Area
Chapter: 6 Section: 6.1.1
Section Title: Delivery System Charges
Revision: Original Effective Date: March 1, 2021

6.1.1.4.2 RIDER EECRF – ENERGY EFFICIENCY COST RECOVERY FACTORS

AVAILABILITY

Rider EECRF recovers the cost of energy efficiency programs not already included in base distribution service rates and is applicable to the kWh sales of Retail Customers taking retail electric delivery service from the Company.

APPLICABILITY

The Rider EECRF is applicable to the current month's billed kWh of each Retail Customer taking electric delivery service from the Company.

MONTHLY RATE

<u>Rate Schedule</u>	<u>Factor</u>
Residential Service	\$0.000937 per kWh
Secondary Service Less than or Equal to 10 kW	\$0.000625 per kWh
Secondary Service Greater than 10 kW	\$0.000796 per kWh
Primary Service	\$0.000308 per kWh
Transmission Service	(\$0.000221) per kW

NOTICE

This rate schedule is subject to the Company's Tariff and Applicable Legal Authorities.

PUC DOCKET NO. _____

APPLICATION OF AEP TEXAS INC.	§	BEFORE THE
TO ADJUST ENERGY EFFICIENCY	§	PUBLIC UTILITY COMMISSION
COST RECOVERY FACTOR AND	§	OF TEXAS
RELATED RELIEF		

PROTECTIVE ORDER

This Protective Order shall govern the use of all information deemed confidential (Protected Materials) or highly confidential (Highly Sensitive Protected Materials), including information whose confidentiality is currently under dispute, by a party providing information to the Public Utility Commission of Texas (Commission) or to any other party to this proceeding.

It is ORDERED that:

1. **Designation of Protected Materials.** Upon producing or filing a document, including, but not limited to, records on a computer disk or other similar electronic storage medium in this proceeding, the producing party may designate that document, or any portion of it, as confidential pursuant to this Protective Order by typing or stamping on its face “PROTECTED PURSUANT TO PROTECTIVE ORDER ISSUED IN DOCKET NO. _____” (or words to this effect) and consecutively Bates Stamping each page. Protected Materials and Highly Sensitive Protected Materials include the documents so designated, as well as the substance of the information contained in the documents and any description, report, summary, or statement about the substance of the information contained in the documents.
2. **Materials Excluded from Protected Materials Designation.** Protected Materials shall not include any information or document contained in the public files of the Commission or any other federal or state agency, court, or local governmental authority subject to the Public Information Act.¹ Protected Materials also shall not include documents or information which at the time of, or prior to disclosure in, a proceeding is or was public knowledge, or which becomes public knowledge other than through disclosure in violation of this Protective Order.

¹ Tex. Gov’t Code Ann. §§ 552.001-552.353 (West 2012 & Supp. 2016).

Docket No. _____

Proposed Protective Order

3. **Reviewing Party.** For the purposes of this Protective Order, a “Reviewing Party” is any party to this docket.
4. **Procedures for Designation of Protected Materials.** On or before the date the Protected Materials or Highly Sensitive Protected Materials are provided to the Commission, the producing party shall file with the Commission and deliver to each party to the proceeding a written statement, which may be in the form of an objection, indicating: (a) any exemptions to the Public Information Act claimed to apply to the alleged Protected Materials; (b) the reasons supporting the producing party’s claim that the responsive information is exempt from public disclosure under the Public Information Act and subject to treatment as protected materials; and (c) that counsel for the producing party has reviewed the information sufficiently to state in good faith that the information is exempt from public disclosure under the Public Information Act and merits the Protected Materials designation.
5. **Persons Permitted Access to Protected Materials.** Except as otherwise provided in this Protective Order, a Reviewing Party may access Protected Materials only through its “Reviewing Representatives” who have signed the Protective Order Certification Form (see Attachment A). Reviewing Representatives of a Reviewing Party include its counsel of record in this proceeding and associated attorneys, paralegals, economists, statisticians, accountants, consultants, or other persons employed or retained by the Reviewing Party and directly engaged in this proceeding. At the request of the PUC Commissioners, copies of Protected Materials may be produced by Commission Staff. The Commissioners and their staff shall be informed of the existence and coverage of this Protective Order and shall observe the restrictions of the Protective Order.
6. **Highly Sensitive Protected Material Described.** The term “Highly Sensitive Protected Materials” is a subset of Protected Materials and refers to documents or information that a producing party claims is of such a highly sensitive nature that making copies of such documents or information or providing access to such documents to employees of the Reviewing Party (except as specified herein) would expose a producing party to unreasonable risk of harm. Highly Sensitive Protected Materials include but are not limited to: (a) customer-specific information protected by § 32.101(c) of the Public Utility

Docket No. _____

Proposed Protective Order

Regulatory Act;² (b) contractual information pertaining to contracts that specify that their terms are confidential or that are confidential pursuant to an order entered in litigation to which the producing party is a party; (c) market-sensitive fuel price forecasts, wholesale transactions information and/or market-sensitive marketing plans; and (d) business operations or financial information that is commercially sensitive. Documents or information so classified by a producing party shall bear the designation “HIGHLY SENSITIVE PROTECTED MATERIALS PROVIDED PURSUANT TO PROTECTIVE ORDER ISSUED IN DOCKET NO. _____” (or words to this effect) and shall be consecutively Bates Stamped. The provisions of this Protective Order pertaining to Protected Materials also apply to Highly Sensitive Protected Materials, except where this Protective Order provides for additional protections for Highly Sensitive Protected Materials. In particular, the procedures herein for challenging the producing party’s designation of information as Protected Materials also apply to information that a producing party designates as Highly Sensitive Protected Materials.

7. **Restrictions on Copying and Inspection of Highly Sensitive Protected Material.**

Except as expressly provided in this Protective Order, one copy of Highly Sensitive Protected Materials may be made and kept in the possession of outside counsel for a Reviewing Party and one copy in the possession of the outside consultants having a need to access the materials, except that additional copies may be made to have sufficient copies for introduction of the material into the evidentiary record if the material is to be offered for admission into the record. The Reviewing Party shall maintain a record of all copies made of Highly Sensitive Protected Material and shall send a duplicate of the record to the producing party when the copy or copies are made. The record shall specify the location and the person possessing the copy. Limited notes may be made of Highly Sensitive Protected Materials, and such notes shall themselves be treated as Highly Sensitive Protected Materials unless such notes are limited to a description of the document and a general characterization of its subject matter in a manner that does not state any substantive information contained in the document.

² Public Utility Regulatory Act, Tex. Util. Code Ann. §§ 11.001-66.016 (PURA).

Docket No. _____

Proposed Protective Order

8. **Restricting Persons Who May Have Access to Highly Sensitive Protected Material.**

With the exception of Commission Staff, the Office of the Attorney General (OAG), and the Office of Public Utility Counsel (OPC), and except as provided herein, the Reviewing Representatives for the purpose of access to Highly Sensitive Protected Materials may be persons who are (a) outside counsel for the Reviewing Party, (b) outside consultants for the Reviewing Party working under the direction of Reviewing Party's counsel or, (c) employees of the Reviewing Party working with and under the direction of Reviewing Party's counsel who have been authorized by the presiding officer to review Highly Sensitive Protected Materials. The Reviewing Party shall limit the number of Reviewing Representatives that review Highly Sensitive Protected Materials to the minimum number of persons necessary. The Reviewing Party is under a good faith obligation to limit access to each portion of any Highly Sensitive Protected Materials to two Reviewing Representatives whenever possible. Reviewing Representatives for Commission Staff, OAG, and OPC, for the purpose of access to Highly Sensitive Protected Materials, shall consist of their respective counsel of record in this proceeding and associated attorneys, paralegals, economists, statisticians, accountants, consultants, or other persons employed or retained by them and directly engaged in these proceedings.

9. **Copies Provided of Highly Sensitive Protected Material.** A producing party shall provide one copy of Highly Sensitive Protected Materials specifically requested by the Reviewing Party to the person designated by the Reviewing Party who must be a person authorized to review Highly Sensitive Protected Material under Paragraph 8. Representatives of the Reviewing Party who are authorized to view Highly Sensitive Protected Material may review the copy of Highly Sensitive Protected Materials at the office of the Reviewing Party's representative designated to receive the information. Any Highly Sensitive Protected Materials provided to a Reviewing Party may not be copied except as provided in Paragraph 7. The restrictions contained herein do not apply to Commission Staff, OPC, and the OAG when the OAG is a representing a party to the proceeding.

10. **Procedures in Paragraphs 10-14 Apply to Commission Staff, OPC, and the OAG and Control in the Event of Conflict.** The procedures in Paragraphs 10 through 14 apply to

Docket No. _____

Proposed Protective Order

responses to requests for documents or information that the producing party designates as Highly Sensitive Protected Materials and provides to Commission Staff, OPC, and the OAG in recognition of their purely public functions. To the extent the requirements of Paragraphs 10 through 14 conflict with any requirements contained in other paragraphs of this Protective Order, the requirements of these Paragraphs shall control.

11. **Copy of Highly Sensitive Protected Material to be Provided to Commission Staff, OPC and the OAG.** When, in response to a request for information by a Reviewing Party, the producing party makes available for review documents or information claimed to be Highly Sensitive Protected Materials, the producing party shall also deliver one copy of the Highly Sensitive Protected Materials to the Commission Staff, OPC, and the OAG (if the OAG is representing a party) in Austin, Texas. Provided however, that in the event such Highly Sensitive Protected Materials are voluminous, the materials will be made available for review by Commission Staff, OPC, and the OAG (if the OAG is representing a party) at the designated office in Austin, Texas. The Commission Staff, OPC and the OAG (if the OAG is representing a party) may request such copies as are necessary of such voluminous material under the copying procedures specified herein.
12. **Delivery of the Copy of Highly Sensitive Protected Material to Commission Staff and Outside Consultants.** The Commission Staff, OPC, and the OAG (if the OAG is representing a party) may deliver the copy of Highly Sensitive Protected Materials received by them to the appropriate members of their staff for review, provided such staff members first sign the certification specified by Paragraph 15. After obtaining the agreement of the producing party, Commission Staff, OPC, and the OAG (if the OAG is representing a party) may deliver the copy of Highly Sensitive Protected Materials received by it to the agreed, appropriate members of their outside consultants for review, provided such outside consultants first sign the certification in Attachment A.
13. **Restriction on Copying by Commission Staff, OPC and the OAG.** Except as allowed by Paragraph 7, Commission Staff, OPC and the OAG may not make additional copies of the Highly Sensitive Protected Materials furnished to them unless the producing party agrees in writing otherwise, or, upon a showing of good cause, the presiding officer directs otherwise. Commission Staff, OPC, and the OAG may make limited notes of Highly

Docket No. _____

Proposed Protective Order

Sensitive Protected Materials furnished to them, and all such handwritten notes will be treated as Highly Sensitive Protected Materials as are the materials from which the notes are taken.

14. **Public Information Requests.** In the event of a request for any of the Highly Sensitive Protected Materials under the Public Information Act, an authorized representative of the Commission, OPC, or the OAG may furnish a copy of the requested Highly Sensitive Protected Materials to the Open Records Division at the OAG together with a copy of this Protective Order after notifying the producing party that such documents are being furnished to the OAG. Such notification may be provided simultaneously with the delivery of the Highly Sensitive Protected Materials to the OAG.
15. **Required Certification.** Each person who inspects the Protected Materials shall, before such inspection, agree in writing to the following certification found in Attachment A to this Protective Order:

I certify my understanding that the Protected Materials are provided to me pursuant to the terms and restrictions of the Protective Order in this docket, and that I have been given a copy of it and have read the Protective Order and agree to be bound by it. I understand that the contents of the Protected Materials, any notes, memoranda, or any other form of information regarding or derived from the Protected Materials shall not be disclosed to anyone other than in accordance with the Protective Order and unless I am an employee of the Commission or OPC shall be used only for the purpose of the proceeding in Docket No. _____. I acknowledge that the obligations imposed by this certification are pursuant to such Protective Order. Provided, however, if the information contained in the Protected Materials is obtained from independent public sources, the understanding stated herein shall not apply.

In addition, Reviewing Representatives who are permitted access to Highly Sensitive Protected Material under the terms of this Protective Order shall, before inspection of such material, agree in writing to the following certification found in Attachment A to this Protective Order:

I certify that I am eligible to have access to Highly Sensitive Protected Material under the terms of the Protective Order in this docket.

Docket No. _____

Proposed Protective Order

The Reviewing Party shall provide a copy of each signed certification to Counsel for the producing party and serve a copy upon all parties of record.

16. **Disclosures between Reviewing Representatives and Continuation of Disclosure Restrictions after a Person is no Longer Engaged in the Proceeding.** Any Reviewing Representative may disclose Protected Materials, other than Highly Sensitive Protected Materials, to any other person who is a Reviewing Representative provided that, if the person to whom disclosure is to be made has not executed and provided for delivery of a signed certification to the party asserting confidentiality, that certification shall be executed prior to any disclosure. A Reviewing Representative may disclose Highly Sensitive Protected Material to other Reviewing Representatives who are permitted access to such material and have executed the additional certification required for persons who receive access to Highly Sensitive Protected Material. In the event that any Reviewing Representative to whom Protected Materials are disclosed ceases to be engaged in these proceedings, access to Protected Materials by that person shall be terminated and all notes, memoranda, or other information derived from the protected material shall either be destroyed or given to another Reviewing Representative of that party who is authorized pursuant to this Protective Order to receive the protected materials. Any person who has agreed to the foregoing certification shall continue to be bound by the provisions of this Protective Order so long as it is in effect, even if no longer engaged in these proceedings.
17. **Producing Party to Provide One Copy of Certain Protected Material and Procedures for Making Additional Copies of Such Materials.** Except for Highly Sensitive Protected Materials, which shall be provided to the Reviewing Parties pursuant to Paragraphs 9, and voluminous Protected Materials, the producing party shall provide a Reviewing Party one copy of the Protected Materials upon receipt of the signed certification described in Paragraph 15. Except for Highly Sensitive Protected Materials, a Reviewing Party may make further copies of Protected Materials for use in this proceeding pursuant to this Protective Order, but a record shall be maintained as to the documents reproduced and the number of copies made, and upon request the Reviewing Party shall provide the party asserting confidentiality with a copy of that record.

Docket No. _____

Proposed Protective Order

18. **Procedures Regarding Voluminous Protected Materials.** 16 Tex. Admin. Code (TAC) § 22.144(h) will govern production of voluminous Protected Materials. Voluminous Protected Materials will be made available in the producing party's voluminous room, in Austin, Texas, or at a mutually agreed upon location, Monday through Friday, 9:00 a.m. to 5:00 p.m. (except on state or Federal holidays), and at other mutually convenient times upon reasonable request.
19. **Reviewing Period Defined.** The Protected Materials may be reviewed only during the Reviewing Period, which shall commence upon entry of this Protective Order and continue until the expiration of the Commission's plenary jurisdiction. The Reviewing Period shall reopen if the Commission regains jurisdiction due to a remand as provided by law. Protected materials that are admitted into the evidentiary record or accompanying the evidentiary record as offers of proof may be reviewed throughout the pendency of this proceeding and any appeals.
20. **Procedures for Making Copies of Voluminous Protected Materials.** Other than Highly Sensitive Protected Materials, Reviewing Parties may take notes regarding the information contained in voluminous Protected Materials made available for inspection or they may make photographic, mechanical or electronic copies of the Protected Materials, subject to the conditions in this Protective Order; provided, however, that before photographic, mechanical or electronic copies may be made, the Reviewing Party seeking photographic, mechanical or electronic copies must provide written confirmation of the receipt of copies listed on Attachment B of this Protective Order identifying each piece of Protected Materials or portions thereof the Reviewing Party will need.
21. **Protected Materials to be Used Solely for the Purposes of These Proceedings.** All Protected Materials shall be made available to the Reviewing Parties and their Reviewing Representatives solely for the purposes of these proceedings. Access to the Protected Materials may not be used in the furtherance of any other purpose, including, without limitation: (a) any other pending or potential proceeding involving any claim, complaint, or other grievance of whatever nature, except appellate review proceedings that may arise from or be subject to these proceedings; or (b) any business or competitive endeavor of

Docket No. _____

Proposed Protective Order

whatever nature. Because of their statutory regulatory obligations, these restrictions do not apply to Commission Staff or OPC.

22. **Procedures for Confidential Treatment of Protected Materials and Information Derived from Those Materials.** Protected Materials, as well as a Reviewing Party's notes, memoranda, or other information regarding or derived from the Protected Materials are to be treated confidentially by the Reviewing Party and shall not be disclosed or used by the Reviewing Party except as permitted and provided in this Protective Order. Information derived from or describing the Protected Materials shall be maintained in a secure place and shall not be placed in the public or general files of the Reviewing Party except in accordance with the provisions of this Protective Order. A Reviewing Party must take all reasonable precautions to insure that the Protected Materials including notes and analyses made from Protected Materials that disclose Protected Materials are not viewed or taken by any person other than a Reviewing Representative of a Reviewing Party.
23. **Procedures for Submission of Protected Materials.** If a Reviewing Party tenders for filing any Protected Materials, including Highly Sensitive Protected Materials, or any written testimony, exhibit, brief, motion or other type of pleading or other submission at the Commission or before any other judicial body that quotes from Protected Materials or discloses the content of Protected Materials, the confidential portion of such submission shall be filed and served in sealed envelopes or other appropriate containers endorsed to the effect that they contain Protected Material or Highly Sensitive Protected Material and are sealed pursuant to this Protective Order. If filed at the Commission, such documents shall be marked "PROTECTED MATERIAL" and shall be filed under seal with the presiding officer and served under seal to the counsel of record for the Reviewing Parties. The presiding officer may subsequently, on his/her own motion or on motion of a party, issue a ruling respecting whether or not the inclusion, incorporation or reference to Protected Materials is such that such submission should remain under seal. If filing before a judicial body, the filing party: (a) shall notify the party which provided the information within sufficient time so that the producing party may seek a temporary sealing order; and (b) shall otherwise follow the procedures in Rule 76a, Texas Rules of Civil Procedure.

Docket No. _____

Proposed Protective Order

24. **Maintenance of Protected Status of Materials during Pendency of Appeal of Order Holding Materials are not Protected Materials.** In the event that the presiding officer at any time in the course of this proceeding finds that all or part of the Protected Materials are not confidential or proprietary, by finding, for example, that such materials have entered the public domain or materials claimed to be Highly Sensitive Protected Materials are only Protected Materials, those materials shall nevertheless be subject to the protection afforded by this Protective Order for three (3) full working days, unless otherwise ordered, from the date the party asserting confidentiality receives notice of the presiding officer's order. Such notification will be by written communication. This provision establishes a deadline for appeal of a presiding officer's order to the Commission. In the event an appeal to the Commissioners is filed within those three (3) working days from notice, the Protected Materials shall be afforded the confidential treatment and status provided in this Protective Order during the pendency of such appeal. Neither the party asserting confidentiality nor any Reviewing Party waives its right to seek additional administrative or judicial remedies after the Commission's denial of any appeal.
25. **Notice of Intent to Use Protected Materials or Change Materials Designation.** Parties intending to use Protected Materials shall notify the other parties prior to offering them into evidence or otherwise disclosing such information into the record of the proceeding. During the pendency of Docket No. _____ at the Commission, in the event that a Reviewing Party wishes to disclose Protected Materials to any person to whom disclosure is not authorized by this Protective Order, or wishes to have changed the designation of certain information or material as Protected Materials by alleging, for example, that such information or material has entered the public domain, such Reviewing Party shall first file and serve on all parties written notice of such proposed disclosure or request for change in designation, identifying with particularity each of such Protected Materials. A Reviewing Party shall at any time be able to file a written motion to challenge the designation of information as Protected Materials.
26. **Procedures to Contest Disclosure or Change in Designation.** In the event that the party asserting confidentiality wishes to contest a proposed disclosure or request for change in designation, the party asserting confidentiality shall file with the appropriate presiding

Docket No. _____

Proposed Protective Order

officer its objection to a proposal, with supporting affidavits, if any, within five (5) working days after receiving such notice of proposed disclosure or change in designation. Failure of the party asserting confidentiality to file such an objection within this period shall be deemed a waiver of objection to the proposed disclosure or request for change in designation. Within five (5) working days after the party asserting confidentiality files its objection and supporting materials, the party challenging confidentiality may respond. Any such response shall include a statement by counsel for the party challenging such confidentiality that he or she has reviewed all portions of the materials in dispute and, without disclosing the Protected Materials, a statement as to why the Protected Materials should not be held to be confidential under current legal standards, or that the party asserting confidentiality for some reason did not allow such counsel to review such materials. If either party wishes to submit the material in question for in camera inspection, it shall do so no later than five (5) working days after the party challenging confidentiality has made its written filing.

27. **Procedures for Presiding Officer Determination Regarding Proposed Disclosure or Change in Designation.** If the party asserting confidentiality files an objection, the appropriate presiding officer will determine whether the proposed disclosure or change in designation is appropriate. Upon the request of either the producing or Reviewing Party or upon the presiding officer's own initiative, the presiding officer may conduct a prehearing conference. The burden is on the party asserting confidentiality to show that such proposed disclosure or change in designation should not be made. If the presiding officer determines that such proposed disclosure or change in designation should be made, disclosure shall not take place earlier than three (3) full working days after such determination unless otherwise ordered. No party waives any right to seek additional administrative or judicial remedies concerning such presiding officer's ruling.
28. **Maintenance of Protected Status during Periods Specified for Challenging Various Orders.** Any party electing to challenge, in the courts of this state, a Commission or presiding officer determination allowing disclosure or a change in designation shall have a period of ten (10) days from: (a) the date of an unfavorable Commission order; or (b) if the Commission does not rule on an appeal of an interim order, the date an appeal of an interim

Docket No. _____

Proposed Protective Order

order to the Commission is overruled by operation of law, to obtain a favorable ruling in state district court. Any party challenging a state district court determination allowing disclosure or a change in designation shall have an additional period of ten (10) days from the date of the order to obtain a favorable ruling from a state appeals court. Finally, any party challenging a determination of a state appeals court allowing disclosure or a change in designation shall have an additional period of ten (10) days from the date of the order to obtain a favorable ruling from the state supreme court, or other appellate court. All Protected Materials shall be afforded the confidential treatment and status provided for in this Protective Order during the periods for challenging the various orders referenced in this paragraph. For purposes of this paragraph, a favorable ruling of a state district court, state appeals court, Supreme Court or other appellate court includes any order extending the deadlines in this paragraph.

29. **Other Grounds for Objection to Use of Protected Materials Remain Applicable.**

Nothing in this Protective Order shall be construed as precluding any party from objecting to the use of Protected Materials on grounds other than confidentiality, including the lack of required relevance. Nothing in this Protective Order constitutes a waiver of the right to argue for more disclosure, provided, however, that unless the Commission or a court orders such additional disclosure, all parties will abide by the restrictions imposed by the Protective Order.

30. **Protection of Materials from Unauthorized Disclosure.** All notices, applications, responses or other correspondence shall be made in a manner which protects Protected Materials from unauthorized disclosure.

31. **Return of Copies of Protected Materials and Destruction of Information Derived from Protected Materials.** Following the conclusion of these proceedings, each Reviewing Party must, no later than thirty (30) days following receipt of the notice described below, return to the party asserting confidentiality all copies of the Protected Materials provided by that party pursuant to this Protective Order and all copies reproduced by a Reviewing Party, and counsel for each Reviewing Party must provide to the party asserting confidentiality a letter by counsel that, to the best of his or her knowledge, information, and belief, all copies of notes, memoranda, and other documents regarding or

Docket No. _____

Proposed Protective Order

derived from the Protected Materials (including copies of Protected Materials) that have not been so returned, if any, have been destroyed, other than notes, memoranda, or other documents which contain information in a form which, if made public, would not cause disclosure of the substance of Protected Materials. As used in this Protective Order, “conclusion of these proceedings” refers to the exhaustion of available appeals, or the running of the time for the making of such appeals, as provided by applicable law. If, following any appeal, the Commission conducts a remand proceeding, then the “conclusion of these proceedings” is extended by the remand to the exhaustion of available appeals of the remand, or the running of the time for making such appeals of the remand, as provided by applicable law. Promptly following the conclusion of these proceedings, counsel for the party asserting confidentiality will send a written notice to all other parties, reminding them of their obligations under this Paragraph. Nothing in this Paragraph shall prohibit counsel for each Reviewing Party from retaining two (2) copies of any filed testimony, brief, application for rehearing, hearing exhibit or other pleading which refers to Protected Materials provided that any such Protected Materials retained by counsel shall remain subject to the provisions of this Protective Order.

32. **Applicability of Other Law.** This Protective Order is subject to the requirements of the Public Information Act, the Open Meetings Act,³ the Texas Securities Act⁴ and any other applicable law, provided that parties subject to those acts will notify the party asserting confidentiality, if possible under those acts, prior to disclosure pursuant to those acts. Such notice shall not be required where the Protected Materials are sought by governmental officials authorized to conduct a criminal or civil investigation that relates to or involves the Protected Materials, and those governmental officials aver in writing that such notice could compromise the investigation and that the governmental entity involved will maintain the confidentiality of the Protected Materials.
33. **Procedures for Release of Information under Order.** If required by order of a governmental or judicial body, the Reviewing Party may release to such body the confidential information required by such order; provided, however, that: (a) the

³ Tex. Gov’t Code Ann. § 551.001-551.146 (West 2012 & Supp. 2016).

⁴ Tex. Rev. Civ. Stat. Ann. arts. 581-1 to 581-43 (West 2010 & Supp. 2016).

Docket No. _____

Proposed Protective Order

Reviewing Party shall notify the producing party of the order requiring the release of such information within five (5) calendar days of the date the Reviewing Party has notice of the order; (b) the Reviewing Party shall notify the producing party at least five (5) calendar days in advance of the release of the information to allow the producing party to contest any release of the confidential information; and (c) the Reviewing Party shall use its best efforts to prevent such materials from being disclosed to the public. The terms of this Protective Order do not preclude the Reviewing Party from complying with any valid and enforceable order of a state or federal court with competent jurisdiction specifically requiring disclosure of Protected Materials earlier than contemplated herein. The notice specified in this section shall not be required where the Protected Materials are sought by governmental officials authorized to conduct a criminal or civil investigation that relates to or involves the Protected Materials, and those governmental officials aver in writing that such notice could compromise the investigation and that the governmental entity involved will maintain the confidentiality of the Protected Materials.

34. **Best Efforts Defined.** The term “best efforts” as used in the preceding paragraph requires that the Reviewing Party attempt to ensure that disclosure is not made unless such disclosure is pursuant to a final order of a Texas governmental or Texas judicial body, the written opinion of the Texas Attorney General sought in compliance with the Public Information Act, or the request of governmental officials authorized to conduct a criminal or civil investigation that relates to or involves the Protected Materials. The Reviewing Party is not required to delay compliance with a lawful order to disclose such information but is simply required to timely notify the party asserting confidentiality, or its counsel, that it has received a challenge to the confidentiality of the information and that the Reviewing Party will either proceed under the provisions of §552.301 of the Public Information Act, or intends to comply with the final governmental or court order. Provided, however, that no notice is required where the Protected Materials are sought by governmental officials authorized to conduct a criminal or civil investigation that relates to or involves the Protected Materials, and those governmental officials aver in writing that such notice could compromise the investigation and that the governmental entity involved will maintain the confidentiality of the Protected Materials.

Docket No. _____

Proposed Protective Order

35. **Notify Defined.** “Notify” for purposes of Paragraphs 32, 33 and 34 means written notice to the party asserting confidentiality at least five (5) calendar days prior to release; including when a Reviewing Party receives a request under the Public Information Act. However, the Commission, OAG, or OPC may provide a copy of Protected Materials to the Open Records Division of the OAG as provided herein.

36. **Requests for Non-Disclosure.** If the producing party asserts that the requested information should not be disclosed at all, or should not be disclosed to certain parties under the protection afforded by this Protective Order, the producing party shall tender the information for in camera review to the presiding officer within ten (10) calendar days of the request. At the same time, the producing party shall file and serve on all parties its argument, including any supporting affidavits, in support of its position of non-disclosure. The burden is on the producing party to establish that the material should not be disclosed. The producing party shall serve a copy of the information under the classification of Highly Sensitive Protected Material to all parties requesting the information that the producing party has not alleged should be prohibited from reviewing the information.

Parties wishing to respond to the producing party’s argument for non-disclosure shall do so within five working days. Responding parties should explain why the information should be disclosed to them, including why disclosure is necessary for a fair adjudication of the case if the material is determined to constitute a trade secret. If the presiding officer finds that the information should be disclosed as Protected Material under the terms of this Protective Order, the presiding officer shall stay the order of disclosure for such period of time as the presiding officer deems necessary to allow the producing party to appeal the ruling to the Commission.

37. **Sanctions Available for Abuse of Designation.** If the presiding officer finds that a producing party unreasonably designated material as Protected Material or as Highly Sensitive Protected Material, or unreasonably attempted to prevent disclosure pursuant to Paragraph 36, the presiding officer may sanction the producing party pursuant to 16 TAC § 22.161.

Docket No. _____

Proposed Protective Order

38. **Modification of Protective Order.** Each party shall have the right to seek changes in this Protective Order as appropriate from the presiding officer.
39. **Breach of Protective Order.** In the event of a breach of the provisions of this Protective Order, the producing party, if it sustains its burden of proof required to establish the right to injunctive relief, shall be entitled to an injunction against such breach without any requirements to post bond as a condition of such relief. The producing party shall not be relieved of proof of any element required to establish the right to injunctive relief. In addition to injunctive relief, the producing party shall be entitled to pursue any other form of relief to which it is entitled.

Docket No. _____

Proposed Protective Order

ATTACHMENT A

Protective Order Certification

I certify my understanding that the Protected Materials are provided to me pursuant to the terms and restrictions of the Protective Order in this docket and that I have received a copy of it and have read the Protective Order and agree to be bound by it. I understand that the contents of the Protected Materials, any notes, memoranda, or any other form of information regarding or derived from the Protected Materials shall not be disclosed to anyone other than in accordance with the Protective Order and unless I am an employee of the Commission or OPC shall be used only for the purpose of the proceeding in Docket No. _____. I acknowledge that the obligations imposed by this certification are pursuant to such Protective Order. Provided, however, if the information contained in the Protected Materials is obtained from independent public sources, the understanding stated here shall not apply.

Signature_____
Party Represented_____
Printed Name_____
Date

I certify that I am eligible to have access to Highly Sensitive Protected Material under the terms of the Protective Order in this docket.

Signature_____
Party Represented_____
Printed Name_____
Date

Docket No. _____

Proposed Protective Order

ATTACHMENT B

I request to view/copy the following documents:

Document Requested	# of Copies	Non-Confidential	Protected Materials and/or Highly Sensitive Protected Materials

Signature

Party Represented

Printed Name

Date

PUBLIC UTILITY COMMISSION OF TEXAS

APPLICATION OF

AEP TEXAS INC.

TO ADJUST

ENERGY EFFICIENCY COST RECOVERY FACTORS AND RELATED RELIEF

DIRECT TESTIMONY OF

ROBERT CAVAZOS

FOR

AEP TEXAS INC.

June 1, 2020

TESTIMONY INDEX

<u>SECTION</u>	<u>PAGE</u>
I. INTRODUCTION	1
II. PURPOSE OF TESTIMONY AND SUMMARY OF AEP TEXAS' FILING	4
III. POLICY CONSIDERATIONS FOR RECOVERY OF ENERGY EFFICIENCY EXPENDITURES.....	9
A. Statutory Policies	9
B. Commission Rule Pertaining to an EECRF Filing	10
IV. AEP TEXAS' APPLICATION.....	12
A. Achievement of Objectives that Exceed the Minimum Goals of the Statute and Rule	13
B. Industrial Notice Customers	14
C. Research and Development (R&D) Costs	15
D. Over-Recovery of PY 2019 Costs.....	16
E. 2019 Performance Bonus.....	17
V. 2019 SUMMARY	18
VI. CONCLUSION.....	19

EXHIBITS

<u>EXHIBIT</u>	<u>DESCRIPTION</u>
EXHIBIT RC-1	<u>AEP Texas Docket 49592 Rate Case Expenses</u>
EXHIBIT RC-2	Docket 49592 Municipal Expenses

1 I. INTRODUCTION

2 Q. PLEASE STATE YOUR NAME, POSITION, AND BUSINESS ADDRESS.

3 A. My name is Robert Cavazos. I am the Energy Efficiency & Consumer Programs Manager
4 for AEP Texas Inc. (AEP Texas) My business address is 539 N. Carancahua, Corpus
5 Christi, Texas 78401.

6 Q. PLEASE STATE YOUR EDUCATIONAL AND PROFESSIONAL BACKGROUND.

7 A. I received a Bachelor of Business Administration degree from Texas A&M University
8 – Corpus Christi in 1998. From 1986 until 1993, I served as a meter reader with Central
9 Power and Light Company, the predecessor to AEP Texas. In 1993, I transferred to the
10 Customer Service Center as a Sr. Telephone Representative and later to the after-hour
11 dispatch center. In 1996, I was appointed to the position of Lead Telephone
12 Representative and in 1998 became Customer Service Supervisor. In 2002, I held the
13 position of Demand Side Management (DSM) Coordinator and in 2004, transferred to
14 Competitive Retail Relations as a Market Specialist. In 2005, I transferred to American
15 Electric Power, Inc.'s (AEP) Human Resource (HR) department as a HR Field
16 Representative and prior to my departure; I had held the position as a Senior HR
17 Consultant. In early 2014, I accepted the position of Business Operations Supervisor
18 and by mid-July had accepted my current position as the Energy Efficiency &
19 Consumer Programs Manager for the former AEP Texas Central Company and AEP
20 Texas North Company, now AEP Texas, overseeing the implementation and
21 administration of energy efficiency programs in compliance with the Public Utility
22 Regulatory Act and with Public Commission of Texas (PUCT or the Commission) rules
23 for such programs.

1 Q. PLEASE DESCRIBE HOW TEXAS CENTRAL COMPANY AND TEXAS NORTH
2 COMPANY HAVE BECOME AEP TEXAS AND HOW THAT MERGER AFFECTS
3 THIS PROCEEDING.

4 A. Effective December 31, 2016, AEP Texas Central Company and AEP Texas North
5 Company were merged into their parent company, now called AEP Texas. The merger
6 was approved by the PUCT in Docket No. 46050 – *Application of AEP Texas Central*
7 *Company, AEP Texas North Company, and AEP Utilities, Inc. for Approval of Merger.*
8 The Commission ordered AEP Texas to “maintain separate [Central and North]
9 divisions, which will continue to charge separate rates and riders, and maintain separate
10 tariffs, unless and until such time as the Commission may consider and approve
11 consolidated rates and tariffs.”¹ Consistent with the Commission’s order, AEP Texas
12 has maintained two divisions within AEP Texas: AEP Texas Central Division and AEP
13 Texas North Division. However, in its recent base-rate case, Docket No. 49494, AEP
14 Texas requested and the Commission approved consolidation of the divisional rates
15 and tariffs. Consistent with that order, AEP Texas seeks in this filing to combine the
16 Central and North Division EECRF into one EECRF for AEP Texas. Notwithstanding
17 this request, AEP Texas’ proposed Rider EECRF for 2021 is based, in part, on historical
18 information. Consequently, because the EECRF filing requires an examination of past
19 energy efficiency programs, this application will still present those figures on a
20 divisional basis where appropriate.

¹ Docket No. 46050, *Application of AEP Texas Central Company, AEP Texas North Company, and AEP Utilities, Inc. for Approval of Merger*, Final Order at Ordering Paragraph No. 2 (Dec. 12, 2016).

1 Q. HAVE YOU PREVIOUSLY FILED TESTIMONY BEFORE ANY REGULATORY
2 AGENCY?

3 A. Yes, I have previously filed testimony before the Commission in the following dockets:

- 4 • Docket No. 44717, Application of AEP Texas Central Company to Adjust its
5 Energy Efficiency Cost Recovery Factor (EECRF) and Related Relief;
- 6 • Docket No. 44718, Application of AEP Texas North Company to Adjust
7 its Energy Efficiency Cost Recovery Factor (EECRF) and Related
8 Relief;
- 9 • Docket No. 45928, Application of AEP Texas North Company to Adjust
10 its Energy Efficiency Cost Recovery Factor (EECRF) and Related
11 Relief;
- 12 • Docket No. 45929, Application of AEP Texas Central Company to
13 Adjust its Energy Efficiency Cost Recovery Factor (EECRF) and
14 Related Relief;
- 15 • Docket No. 47236, Application of AEP Texas Inc. to Adjust its Energy
16 Efficiency Cost Recovery Factors (EECRF) and Related Relief;
- 17 • Docket No. 48422, Application of AEP Texas Inc. to Adjust its Energy
18 Efficiency Cost Recovery Factors (EECRF) and Related Relief; and
- 19 • Docket No. 49592, Application of AEP Texas Inc. to Adjust its Energy
20 Efficiency Cost Recovery Factors (EECRF) and Related Relief.

21 Q. DO YOU SPONSOR ANY OF THE SCHEDULES THAT ACCOMPANY AEP
22 TEXAS' FILING?

23 A. Yes, I sponsor Schedule D. In addition, I co-sponsor Schedules A, J, P, and S with AEP
24 Texas witness Pamela D. Osterloh; Schedules A and C with AEP Texas witness
25 Jennifer L. Jackson; and Schedule K with AEP Texas witness Brian J. Lysiak.

26 Q. DESCRIBE THE AEP TEXAS ENERGY EFFICIENCY AND CONSUMER
27 PROGRAMS DEPARTMENT.

28 A. The AEP Texas Energy Efficiency and Consumer Programs (EE/CP) Department
29 consists of 10 employee positions, each with certain designated responsibilities for the

1 design, implementation, and overall administration of energy efficiency and demand
2 response programs for AEP Texas.

3 The EE/CP employees are responsible for administering standard offer
4 programs (SOPs) and market transformation programs (MTPs) to achieve the mandated
5 goals for energy efficiency. Program administration includes outreach activities,
6 application review, contract execution, on-site inspections of work submitted, invoice
7 review and processing, website maintenance, monitoring of the programs, and energy
8 efficiency expense accounting. In addition, the EE/CP employees ensure compliance
9 with regulatory rules and statutory requirements by providing statutorily-mandated
10 energy efficiency opportunities for all eligible customers through third-party
11 contractors on a non-discriminatory, market-neutral basis.

12
13 II. PURPOSE OF TESTIMONY AND SUMMARY OF AEP TEXAS' FILING

14 Q. WHAT IS THE PURPOSE OF YOUR DIRECT TESTIMONY?

15 A. The purpose of my testimony is to:

- 16 • provide a summary of the relief sought by AEP Texas in this proceeding
17 and of its filing;
- 18 • lay out the policy considerations for recovery of AEP Texas' projected
19 costs for its 2021 energy efficiency programs in its adjusted EECRF for
20 2021, as contemplated by Section 39.905 of the Public Utility
21 Regulatory Act² (PURA) and 16 Tex. Admin. Code § 25.182(d) (TAC);
- 22 • provide information regarding the over-recovery of AEP Texas' energy
23 efficiency program revenues for its 2019 programs to be included in its
24 adjusted EECRF in 2021;

² PURA is codified at Tex. Util. Code Ann. §§ 11.001–66.016.

- 1 • provide information regarding AEP Texas' performance bonus for its
2 2019 energy efficiency results, as contemplated in 16 TAC § 25.182(e),
3 to be recovered through its adjusted EECRF in 2021;
- 4 • provide information regarding AEP Texas' share of costs for
5 Evaluation, Measurement and Verification (EM&V) activities for
6 evaluating programs, as contemplated in 16 TAC § 25.182(d)(1), to be
7 recovered through its adjusted EECRF; and
- 8 • provide information regarding recovery of 2019 EECRF proceeding
9 expenses incurred in Docket No. 49592 by AEP Texas and the
10 municipalities to be recovered through its adjusted EECRF in 2021.

11 Q. PLEASE DESCRIBE AEP TEXAS' FILING.

12 A. AEP Texas' filing consists of my direct testimony and the direct testimony of three
13 other witnesses (Osterloh, Jackson, and Lysiak). Ms. Osterloh's direct testimony
14 addresses the energy efficiency costs that the AEP Texas incurred for its 2019
15 programs; the EM&V costs actually incurred in 2019 for the evaluation of program
16 year (PY) 2018; energy efficiency results from its 2019 programs; energy efficiency
17 goals for 2021 as established by the Commission's rule; the impact of the industrial
18 identification notice as stated in 16 TAC § 25.181(u); the programs that AEP Texas
19 will offer in 2021 to meet its energy efficiency objectives; the costs AEP Texas projects
20 to incur in 2021 in connection with these energy efficiency programs and objectives;
21 and Docket No. 49592 EECRF proceeding expenses incurred by AEP Texas and
22 incurred by the municipalities and reimbursed by AEP Texas pursuant to 16 TAC
23 § 25.182(d)(3).

24 Ms. Jackson's direct testimony describes the design of the adjusted EECRF, the
25 energy efficiency cost assignment among the EECRF rate classes to be recovered
26 through the adjusted EECRF, and the billing determinants used to develop the adjusted
27 EECRF.

1 Mr. Lysiak's direct testimony describes the costs billed between the AEP Texas
2 divisions for AEP Texas' energy efficiency programs and the reasonableness of these
3 costs.

4 Accompanying the direct testimony of AEP Texas' witnesses are Schedules A
5 through R, which include the information that the Commission has specified should be
6 provided in support of a sufficient request for the adjusted EECRF. The reasonableness
7 of costs incurred in 2019 is included within the schedules of this filing. AEP Texas has
8 also included Schedule S, AEP Texas' Revised 2020 Energy Efficiency Plan and
9 Report (EEPR) filed in Docket No. 50666.

10 Q. WHAT RELIEF DOES AEP TEXAS SEEK IN THIS PROCEEDING?

11 A. 16 TAC § 25.182(d)(8) requires a utility in an area in which customer choice is offered
12 to apply no later than June 1st —of each year to adjust its EECRF effective March 1st
13 —of the following year, in order to reflect changes in costs, performance bonus, its
14 share of EM&V costs, and to minimize any over- or under-recovery in prior years'
15 program costs. Accordingly, by this application AEP Texas requests the Commission
16 adjust the AEP Texas EECRFs to recover \$20,531,462. As my testimony and the
17 testimony of AEP Texas witnesses Osterloh, Jackson, and Lysiak explain, the amount
18 AEP Texas seeks to recover through its adjusted 2021 EECRF reflects the following
19 components:

- 20 1) recovery of \$17,747,659 for AEP Texas which is the forecasted 2021
21 energy efficiency program expenditures;
22 2) return to customers the amount of \$948,163 representing the
23 over-recovery of actual energy efficiency costs for 2019 (includes
24 interest and recovery of 2018 EM&V costs);

- 1 3) recovery of \$3,475,676 representing AEP Texas' 2019 performance
2 bonus for achieving demand and energy savings that exceeded its
3 minimum goals to be achieved in 2019;
4 4) recovery of \$44,303 representing EECRF proceeding expenses incurred
5 in Docket No. 49592 by AEP Texas and the municipalities as authorized
6 by 16 TAC § 25.182(d)(3); and
7 5) recovery of \$211,988 for AEP Texas' share of the EM&V cost to
8 evaluate PY 2020.

9 Q. WHAT ARE AEP TEXAS' ESTIMATED PY 2021 ENERGY EFFICIENCY COSTS?

10 A. As shown in Schedule A, PY 2021 projected energy efficiency program cost of
11 \$17,959,647 is reasonably necessary for AEP Texas to achieve its energy efficiency
12 objectives for PY 2021 pursuant to 16 TAC § 25.181(e)(1).

13 Q. DOES AEP TEXAS' 2021 EECRF INCLUDE AEP TEXAS' PROJECTED SHARE
14 OF THE STATEWIDE EM&V COSTS?

15 A. Yes, AEP Texas is including \$211,988 to be incurred in 2021 for the evaluation of PY
16 2020.

17 Q. DO AEP TEXAS' CURRENT BASE RATES INCLUDE ANY AMOUNT THAT IS
18 EXPRESSLY SPECIFIED FOR ENERGY EFFICIENCY?

19 A. No. In the Commission's Final Order in Docket No. 49494, AEP Texas' last rate case,
20 the Commission approved AEP Texas' request to move energy efficiency costs out of
21 base rates. However, as addressed in the testimony of Ms. Jackson, AEP Texas did
22 have energy efficiency costs in base rates in 2019.

23 Q. DID AEP TEXAS SPEND MORE OR LESS THAN IT PROJECTED FOR ITS 2019
24 ENERGY EFFICIENCY PROGRAMS?

1 A. As shown on Schedule B, Central Division incurred a total of \$14,032,803 in energy
2 efficiency expenditures and EM&V costs in 2019, which is \$538,743 less than its 2019
3 projection for energy efficiency.

4 As shown on Schedule B, North Division incurred a total of \$3,236,930 in
5 energy efficiency expenditures and EM&V costs in 2019, which is \$151,170 less than
6 its 2019 projection for energy efficiency.

7 Q. DID AEP TEXAS EXCEED ITS GOALS FOR 2019?

8 A. Yes, Central Division exceeded its demand reduction and energy reduction goals for
9 PY 2019 of 16.14 megawatt (MW) and 28,277 megawatt-hour (MWh) respectively.
10 North Division exceeded its demand reduction and energy reduction goals for PY 2019
11 of 4.26 MW and 7,464 MWh respectively.

12 Q. DID AEP TEXAS EARN A PERFORMANCE BONUS FOR ITS 2019 ENERGY
13 EFFICIENCY ACHIEVEMENTS?

14 A. Yes. AEP Texas earned for a \$3,475,676 performance bonus. Schedule D sets forth the
15 calculation of the \$2,859,931 and \$615,745 performance bonus that Central Division
16 and North Division earned, respectively. AEP Texas requests that these performance
17 bonus amounts of \$3,475,676 also be included for recovery through its adjusted
18 EECRF for 2021.

19 Q. WHAT DOES AEP TEXAS REQUEST TO BE THE EFFECTIVE DATE OF THE
20 ADJUSTED EECRF FOR 2021?

21 A. Pursuant to 16 TAC § 25.182(d)(8), AEP Texas requests that the adjusted EECRF be
22 made effective March 1, 2021.

1 III. POLICY CONSIDERATIONS FOR
2 RECOVERY OF ENERGY EFFICIENCY EXPENDITURES

3 A. Statutory Policies

4 Q. WHAT ARE THE STATUTORY POLICY CONSIDERATIONS THAT GOVERN
5 THE RECOVERY OF ENERGY EFFICIENCY COSTS?

6 A. In PURA § 39.905, the Texas Legislature established policies that an electric utility
7 such as AEP Texas annually will provide, through market-based SOPs or targeted
8 MTPs, incentives sufficient for retail electric providers (REPs) and competitive energy
9 efficiency service providers (EESPs) to acquire additional cost-effective energy
10 efficiency, subject to cost ceilings established by the Commission, for the utility's
11 residential and commercial customers equivalent to:

- 12 a) not less than 30 percent of the utility's annual growth in demand of
13 residential and commercial customers by December 31st of each year
14 beginning with the 2013 calendar year; however, not less than the
15 preceding year; and
- 16 b) for an electric utility whose amount of energy efficiency to be acquired
17 under this subsection is equivalent to at least four-tenths of one percent
18 of the electric utility's summer weather-adjusted peak demand for
19 residential and commercial customers in the previous calendar year, not
20 less than four-tenths of one percent of the utility's summer weather-
21 adjusted peak demand for residential and commercial customers by
22 December 31st of each subsequent year; however, not less than the
23 preceding year.

24 The Legislature has also recognized that a utility should have access to a
25 mechanism to enable it to fully and timely recover the costs of providing these energy
26 efficiency programs. Additionally, PURA directs the Commission to adopt rules that
27 establish an incentive and reward utilities that exceed their minimum goals.

1 B. Commission Rule Pertaining to an EECRF Filing

2 Q. WHAT ARE THE MINIMUM ANNUAL ENERGY EFFICIENCY GOALS FOR PY
3 2021?

4 A. 16 TAC § 25.181(e)(1) provides, in pertinent part, for the following minimum energy
5 efficiency goals:

6 (A) Beginning with the 2013 program year, until the trigger described in
7 subparagraph (B) is reached, a 30% reduction of its annual growth in
8 demand of residential and commercial customers.

9 (B) If the demand reduction goal to be acquired by a utility under
10 subparagraph (A) is equivalent to at least four-tenths of 1% of its summer
11 weather-adjusted peak demand for the combined residential and
12 commercial customers for the previous program year, the utility must meet
13 the energy efficiency goal described in subparagraph (C) for each
14 subsequent program year.

15 (C) Once the trigger described in subparagraph (B) is reached, the utility
16 must acquire four-tenths of 1% of its summer weather-adjusted peak
17 demand for the combined residential and commercial customers for the
18 previous program year.

19 (D) Except as adjusted in accordance with subsection (u) of the rule, a
20 utility's demand reduction goal in any year shall not be lower than its goal
21 for the prior year, unless the Commission establishes a goal for a utility
22 pursuant to paragraph (2) of 16 TAC § 25.181(e).

23 Q. HOW HAS AEP TEXAS ESTABLISHED ITS GOAL FOR 2021?

24 A. AEP Texas has calculated its goal as determined by 16 TAC § 25.181(e)(1)(C).

25 Q. WHY IS AEP TEXAS FILING THIS REQUEST TO ADJUST ITS EECRF FOR
26 RECOVERY OF ITS PROJECTED PY 2021 ENERGY EFFICIENCY
27 EXPENDITURES?

28 A. The Commission rule includes provisions for a utility such as AEP Texas to request
29 that an EECRF be adjusted to recover its annual energy efficiency program
30 expenditures (16 TAC § 25.182(d)(1)). AEP Texas witness Jackson's testimony

1 outlines the design of factors to accomplish this. Also, as I stated earlier, 16 TAC §
2 25.182(d)(8) requires a utility in an area in which customer choice is offered to apply
3 to adjust its EECRF no later than June 1st of each year, with the adjusted EECRF to be
4 effective March 1st of the following year, to reflect changes in program costs and
5 performance bonus and to minimize any over- or under-recovery in prior year program
6 costs.

7 Q. WHAT ARE THE REQUIRED ELEMENTS TO BE COVERED WITHIN THE
8 SCOPE OF THIS PROCEEDING?

9 A. Specifically, a utility is authorized to recover the differential between the costs
10 expressly included in base rates (if such energy efficiency costs are expressly included
11 in base rates), adjusted to account for changes in billing determinants from the test year
12 billing determinants used to set rates in the last base rate proceeding, and the increased
13 costs it must incur in order to meet the objectives of PURA § 39.905, including the
14 achievement of additional cost-effective energy efficiency in excess of the minimum
15 goals set forth in the statute.

16 As outlined in the Commission rule for energy efficiency, an EECRF rate
17 schedule must be included in the utility's tariff to permit the utility to timely recover
18 the reasonable costs of providing energy efficiency programs, including prior years'
19 over- or under-recovery of energy efficiency program costs, any applicable
20 performance bonus (16 TAC § 25.182(e)), projected EM&V costs, and EECRF
21 proceeding expenses incurred by AEP Texas and municipalities (16 TAC
22 § 25.182(d)(3)). The EECRF is to be calculated to recover the costs associated with the
23 programs from EECRF classes that receive services under the programs AEP Texas

1 offers (16 TAC § 25.182(d)(2)). The Commission may approve an energy charge for
2 the EECRF. The EECRF must be set at a rate that will give AEP Texas the opportunity
3 to earn revenues equal to the sum of AEP Texas' forecasted energy efficiency program
4 costs, net of energy efficiency costs included in base rates, applicable prior years'
5 energy efficiency over- or under-recovery, applicable performance bonus (16 TAC §
6 25.182(d)(1)), projected EM&V costs, and AEP Texas and municipal EECRF
7 proceeding expenses.

8 According to the Commission rule regarding a proceeding to change an
9 EECRF, a utility must show that the costs to be recovered through the EECRF are
10 reasonable estimates of the costs necessary to provide energy efficiency programs and
11 to meet the utility's goals (16 TAC § 25.182(d)(12)).

12 13 IV. AEP TEXAS' APPLICATION

14 Q. WHAT ARE THE ESSENTIAL ELEMENTS CONTAINED WITHIN AEP TEXAS'
15 APPLICATION REQUESTING EECRF RECOVERY OF ITS PROGRAM COSTS?

16 A. According to 16 TAC § 25.182(d)(10), a utility's application to change an EECRF must
17 include testimony and schedules. AEP Texas' application includes testimony and
18 schedules providing the information in compliance with 16 TAC § 25.182(d) for
19 approval of an adjusted EECRF that show:

- 20 1. the forecasted energy efficiency program costs for PY 2021;
- 21 2. the actual base rate recovery of energy efficiency program costs, adjusted
22 for changes in load subsequent to the last base rate proceeding;
- 23 3. the performance bonus based on AEP Texas' PY 2019 energy efficiency
24 achievements;

- 1 4. the amount of AEP Texas' PY 2019 actual energy efficiency costs that
- 2 exceeded the amount recovered in base rates;
- 3 5. any adjustment for past over- or under-recovery of energy efficiency
- 4 revenues including interest;
- 5 6. information concerning the calculation of billing determinants for 2019
- 6 and 2021;
- 7 7. the direct assignment and allocation of energy efficiency costs to eligible
- 8 rate classes, including any portion of energy efficiency costs included in
- 9 base rates;
- 10 8. information concerning calculations related to the cost cap requirements;
- 11 9. incentive payments by program, including a list of each EESP receiving
- 12 more than 5% of 2019 overall incentive payments and the percentage of
- 13 2019 incentives received by those EESPs;
- 14 10. administrative costs, including any EECRF proceeding expenses for
- 15 2019;
- 16 11. actual EECRF revenues by rate class, for the period of over-recovery of
- 17 2019 EECRF costs;
- 18 12. AEP Texas' bidding and engagement process for contracting with
- 19 EESPs, including a list of all EESPs that received incentive payments
- 20 during 2019;
- 21 13. the estimated useful life for each measure in each program; and
- 22 14. the actual energy efficiency program costs for PY 2019.

23 All of these elements in AEP Texas' application for approval of its adjusted EECRF
24 for 2021 are required by virtue of 16 TAC § 25.182(d)(10) and (11).

25 A. Achievement of Objectives that Exceed the
26 Minimum Goals of the Statute and Rule

27 Q. WHAT DEMAND REDUCTION AND ENERGY SAVINGS DOES AEP TEXAS
28 PROPOSE TO ACHIEVE THROUGH ITS PY 2021 PROGRAMS?

29 A. AEP Texas' PY 2021 minimum demand reduction goal is 20.60 MW, as calculated in
30 accordance with 16 TAC § 25.181(e)(1)(B)(C) and (D). AEP Texas' PY 2021 energy
31 savings goal is 36,091 MWh, as calculated in accordance with 16 TAC § 25.181(e)(4).

1 The energy efficiency objectives AEP Texas seeks to achieve through its
2 proposed PY 2021 energy efficiency expenditures include a peak demand reduction of
3 as much as 42.96 MW and energy savings of as much as 62,918 MWh.

4 Q. DO YOU BELIEVE IT IS CONSISTENT WITH THE COMMISSION RULE TO
5 PURSUE THE OBJECTIVES AEP TEXAS HAS ESTABLISHED FOR ITS PY 2021
6 PROGRAM?

7 A. Yes, I believe the intent of the Commission rule is for AEP Texas to achieve as much
8 cost-effective energy efficiency as is reasonably possible. This intent is manifested in
9 PURA § 39.905(b)(2), wherein the Legislature authorized the Commission to provide
10 a performance bonus to reward a utility for “administering programs under this section
11 that exceed the minimum goals established by this section.” The express
12 characterization of the goals in PURA § 39.905 as “minimum goals” clearly indicates
13 the Legislature’s desire that utilities be encouraged to exceed these goals where
14 additional cost-effective energy efficiency is reasonably possible.

15 B. Industrial Notice Customers

16 Q. HAVE ANY OF AEP TEXAS’ INDUSTRIAL CUSTOMERS PROVIDED NOTICE
17 PURSUANT TO 16 TAC § 25.181(u)?

18 A. Yes. Please see the testimony of witness Osterloh for discussion regarding such notice.

19 Q. ARE THESE INDUSTRIAL CUSTOMERS WHO HAVE PROVIDED NOTICE
20 EXEMPT FROM PAYING CHARGES IN THE ADJUSTED EECRF FOR 2021?

21 A. Yes. 16 TAC § 25.181(u) states that if an identification notice was submitted to the
22 utility no later than February 1st to be effective the following program year, the

1 identified industrial customer(s) shall not be charged any EECRF costs for a period of
2 three years.

3 C. Research and Development (R&D) Costs

4 Q. DID AEP TEXAS' PY 2019 ENERGY EFFICIENCY PROGRAM COSTS INCLUDE
5 R&D EXPENDITURES?

6 A. Yes. Please see the testimony of witness Osterloh for discussion regarding R&D
7 expenditures.

8 Q. DOES AEP TEXAS' PY 2021 ENERGY EFFICIENCY PROGRAM COST
9 INCLUDE R&D EXPENDITURES?

10 A. Yes, it does.

11 Q. HAS AEP TEXAS PROJECTED ITS PY 2021 R&D EXPENDITURES?

12 A. Yes. AEP Texas has projected \$565,125 for R&D expenditures in PY 2021.

13 Q. HAS AEP TEXAS INCLUDED THE MAXIMUM AMOUNT IN PY 2021 FOR
14 ENERGY EFFICIENCY R&D EXPENDITURES ALLOWED BY THE
15 COMMISSION RULE?

16 A. No, 16 TAC § 25.181(g) specifies that the maximum amount of energy efficiency R&D
17 costs that AEP Texas could incur is 10% of its total program costs for the previous
18 program year, for PY 2021. However, AEP Texas has projected the amount it considers
19 to be reasonable for projected R&D expenditures to be \$565,125 considering the whole
20 of its energy efficiency program offerings and the magnitude of its required demand
21 reduction goal to be achieved in PY 2021.

D. Over-Recovery of PY 2019 Costs

1
2 Q. IS AEP TEXAS SEEKING TO RETURN TO CUSTOMERS THE AMOUNT OF
3 OVER-RECOVERED ENERGY EFFICIENCY PROGRAM REVENUES
4 COLLECTED THROUGH ITS 2019 EECRF IN EXCESS OF THE AMOUNT OF
5 ENERGY EFFICIENCY PROGRAM COSTS ACTUALLY INCURRED IN PY
6 2019?

7 A. Yes. In addition to collecting its projected total PY 2021 energy efficiency program
8 expenditures, AEP Texas is requesting to return within its adjusted 2021 EECRF the
9 amount of its actual 2019 EECRF program revenues that exceeded the amount of its
10 energy efficiency program expenditures in PY 2019, including interest.

11 Q. PLEASE EXPLAIN THE BASIS FOR AEP TEXAS' INCLUSION OF THE 2019
12 OVER-RECOVERY AMOUNT WITHIN ITS ADJUSTED 2021 EECRF.

13 A. PURA § 39.905(b-1) provides that:

14 The energy efficiency cost recovery factor under Subsection (b)(1) may not
15 result in an over-recovery of costs but may be adjusted each year to change
16 rates to enable utilities to match revenues against energy efficiency costs
17 and any incentives to which they are granted. The factor shall be adjusted
18 to reflect any over-collection or under-collection of energy efficiency cost
19 recovery revenues in previous years.

20 16 TAC § 25.182(d)(1)(A) further states that the "EECRF shall be calculated based
21 on . . . the preceding year's over- or under-recovery." The proposed EECRF reflects a
22 return to customers in the amount of \$644,619 for the Central Division and \$303,545
23 for the North Division, representing the over-recovery of \$948,163 for AEP Texas
24 actual energy efficiency costs for 2019, including interest.

E. 2019 Performance Bonus

Q. HAS AEP TEXAS CALCULATED THE PERFORMANCE BONUS IT SEEKS TO RECOVER IN CONNECTION WITH ITS PY 2019 ENERGY EFFICIENCY ACHIEVEMENTS?

A. Yes. Please refer to Schedule D for each division, which I sponsor. This schedule demonstrates the calculation of the \$2,859,931 and \$615,745 performance bonus that Central Division and North Division, respectively, seek to be awarded based upon its PY 2019 energy efficiency results.

Central Division achieved a peak demand reduction of 39.70 MW and energy savings of 58,398 MWh from its PY 2019 portfolio of energy efficiency programs. Central Division's minimum demand reduction goal to be achieved in 2019 was 16.14 MW, and the calculated energy reduction goal to be achieved in 2019 was 28,277 MWh. Central Division exceeded both its PY 2019 demand reduction and energy reduction goals.

North Division achieved a peak demand reduction of 6.58 MW and energy savings of 11,968 MWh from its PY 2019 portfolio of energy efficiency programs. North Division's minimum demand reduction goal to be achieved in 2019 was 4.26 MW, and the calculated energy reduction goal to be achieved in 2019 was 7,464 MWh. North Division exceeded both its PY 2019 demand reduction and energy reduction goals.

These achievements qualify AEP Texas for a performance bonus per the Commission rule. All of the calculations and requirements regarding the \$3,475,676 performance bonus AEP Texas now seeks are as outlined in 16 TAC § 25.182(e).

1 F. 2019 Energy Efficiency Proceeding Expenses

2 Q. HAS AEP TEXAS INCLUDED EECRF PROCEEDING EXPENSES?

3 A. Yes. According to 16 TAC § 25.182(d)(3), a proceeding to adjust an EECRF is a
4 ratemaking proceeding for purposes of PURA § 33.023 and 36.061. In addition,
5 EECRF proceeding expenses are to be included in the adjusted EECRF calculated
6 pursuant to 16 TAC § 25.182(d)(1). In accordance with 16 TAC § 25.182(d)(3), AEP
7 Texas includes only EECRF proceeding expenses paid or owed for the immediately
8 previous EECRF proceeding conducted under this subsection for services reimbursable
9 under PURA § 33.023(b). In this proceeding, AEP Texas is requesting recovery of
10 \$35,404 of AEP Texas' expenses for Docket No. 49592 and \$8,899 in municipal
11 expenses. The invoices relating to AEP Texas' 2019 EECRF rate-case expenses in
12 Docket No. 49592 are included with the affidavit of Melissa Gage attesting to the
13 reasonableness of those costs as EXHIBIT RC-1. The invoices for the municipalities
14 expenses are included as EXHIBIT RC-2. A description of how these rate-case
15 expenses are incorporated into the 2021 Rider EECRF rates can be found in witness
16 Jackson's testimony.

17
18 V. 2019 SUMMARY

19 Q. HAS AEP TEXAS PROVIDED INFORMATION REGARDING PY 2019?

20 A. Yes. Information demonstrating the reasonableness of the energy efficiency costs
21 incurred and revenues received for PY 2019 is included in this filing.

1 Q. HAS AEP TEXAS INCURRED ANY 2019 AFFILIATE COSTS?

2 A. No. As explained by Brian Lysiak, during 2019, no American Electric Power Service
3 Corporation (AEPSC) services were provided for the 2019 energy efficiency programs.
4 However, there were services provided by each division of AEP Texas to support the
5 other division. Because the Central and North divisions are not affiliates under PURA
6 or the Commission's rules, there were no affiliate services in 2019. However, Mr.
7 Lysiak provides testimony to show that even if the Commission's affiliate rules were
8 applied, the services provided by the two divisions would comply with the affiliate
9 standards. In 2019, Central Division incurred \$183,516 in costs from the North
10 Division, which is 1.3% of Central Division's actual 2019 energy efficiency costs as
11 addressed in witness Lysiak's testimony. In 2019, North Division incurred \$85,613 in
12 costs from the Central Division, which is 2.6% of North Division's actual 2019 energy
13 efficiency costs as addressed in witness Lysiak's testimony. Please refer to Schedule K
14 for additional information.

15 Q. ARE THE 2019 EXPENSES BETWEEN THE DIVISIONS REASONABLE AND
16 NECESSARY?

17 A. Yes, these services are reasonable and necessary costs for AEP Texas' provision of
18 energy efficiency programs.

19

20 VI. CONCLUSION

21 Q. PLEASE BRIEFLY SUMMARIZE YOUR TESTIMONY.

22 A. The components AEP Texas includes in its request to adjust its 2021 EECRF have been
23 properly calculated in accordance with the applicable standards and criteria.

- 1 1. The energy efficiency costs projected by AEP Texas for its PY 2021
2 programs represent reasonable estimates of the costs necessary to
3 provide energy efficiency programs to meet AEP Texas' energy
4 efficiency objectives for PY 2021.
- 5 2. AEP Texas' PY 2019 performance bonus calculation comports fully
6 with the applicable provisions of the Commission rule.
- 7 3. The PY 2019 energy efficiency program expenditures were reasonable
8 and necessary costs to provide energy efficiency programs for PY 2019.
9 It is reasonable and in accordance with the applicable Commission rule
10 to include the portion of those costs that exceeds the amount of energy
11 efficiency funding collected through AEP Texas' base rates, and that
12 revenues that were over-recovered in its 2019 EECRF be returned in the
13 adjusted 2021 EECRF.
- 14 4. Proceeding expenses for the previous year's EECRF proceeding are
15 included in this filing for recovery in the adjusted 2021 EECRF.

16 Q. DOES AEP TEXAS' APPLICATION MEET ALL OF THE REQUIREMENTS FOR
17 ADJUSTMENT TO A UTILITY'S EECRF AS SET FORTH IN 16 TAC § 25.182(d)?

18 A. Yes, AEP Texas' application meets all of the requirements for approval of the requested
19 adjustment to its 2021 EECRF to recover all of the components described in my direct
20 testimony and fully supported by AEP Texas' other witnesses.

21 Q. DOES THIS CONCLUDE YOUR DIRECT TESTIMONY?

22 A. Yes, it does.



AEP Texas EECRF Gage Affidavit RCE FINAL.pdf

DocVerify ID: D1CD736A-7523-48C0-850C-E1DA0B61A94D
Created: May 22, 2020 13:56:25 -8:00
Pages: 5
Remote Notary: Yes / State: OH

This document is a DocVerify VeriVaulted protected version of the document named above. It was created by a notary or on the behalf of a notary and it is also a DocVerify E-Sign document, which means this document was created for the purposes of Electronic Signatures and/or Electronic Notary. Tampered or altered documents can be easily verified and validated with the DocVerify VeriCheck system. This remote online notarization involved the use of communication technology.

Go to www.docverify.com at any time to verify or validate the authenticity and integrity of this or any other DocVerify VeriVaulted document.

E-Signature Summary

E-Signature 1: Melissa Gage (MG)

May 26, 2020 13:07:23 -8:00 [86FA408C5FE1] [167.239.221.85]
magage@aep.com (Principal) (Personally Known)

E-Signature Notary: Sarah Smithhisler (SRS)

May 26, 2020 13:07:23 -8:00 [DE1390EDD1D7] [167.239.2.87]
srsmithhisler@aep.com

I, Sarah Smithhisler, did witness the participants named above electronically sign this document.



DocVerify documents should not be altered or tampered with in any way or be they are protected by the DocVerify VeriVault System. Best viewed with Adobe Reader or Adobe Acrobat. All visible electronic graphics contained in this document are symbolic representations of the persons' signatures and not intended to be an accurate depiction of the persons' actual signature as defined by various Acts and/or Laws.



APPLICATION OF AEP TEXAS INC. § BEFORE THE
FOR APPROVAL TO ADJUST §
ENERGY EFFICIENCY COST § PUBLIC UTILITY COMMISSION
RECOVERY FACTOR AND RELATED §
RELIEF § OF TEXAS

[illegible]

My name is Melissa A. Gage. I am over the age of twenty-one years, am of sound mind, have personal knowledge of the statements made herein, and the facts are true and correct. I am competent to make this Affidavit.

1. I am employed by AEP Service Corporation (AEPSC) as Associate General Counsel. I have practiced law for over a decade, including many cases before the Public Utility Commission of Texas (PUCT).
2. I am employed by AEPSC as an attorney in its Legal Department. I have represented American Electric Power's subsidiary operating companies, including AEP Texas Inc. (AEP Texas) on a number of various matters. Such matters include several past energy efficiency cost recovery factor (EECRF) proceedings.
3. I have hired and managed outside counsel and testifying and consulting experts in numerous matters. I have been responsible for reviewing and approving invoices from outside law firms and consultants.
4. As Associate General Counsel for AEPSC, which is responsible for providing legal services to all American Electric Power Company business units, I am familiar with the

rates of a broad range of lawyers, both those at small and large firms and solo practitioners, including the rates charged by such attorneys for work on PUCT matters.

5. In the 2019, *Application of AEP Texas Inc. to Adjust Energy Efficiency Cost Recovery Factors and Related Relief*, Docket No. 49592, AEP Texas was represented by outside counsel with the law firm of Duggins Wren Mann and Romero (DWMR). The DWMR attorneys who worked on this matter have extensive experience representing utilities before the PUCT, including EECRF proceedings.
6. Patrick Pearsall was the primary attorney at DWMR representing AEP Texas in its 2019 EECRF filing in Docket No. 49592. Mr. Pearsall has been a licensed Texas attorney for over 15 years, representing utility clients before the PUCT and Texas courts for the last 13 years, and one of DWMR's outside counsels in various proceedings. Moreover, AEP Texas is not the only client he represents before the PUCT. Mr. Pearsall is therefore knowledgeable of and skilled in PUCT practices and procedures. AEP Texas was also represented by an associate attorney at DWMR who assisted Mr. Pearsall representing AEP Texas in a cost effective manner.
7. The invoices to AEP Texas from DWMR for work in Docket No. 49592 total \$35,403.69 and are attached. The billings provide detail of what task was being addressed for the time billed, and therefore, indicate the time billed for any specific issue or issues in last year's proceeding, which would also indicate the amount of rate-case expenses reasonably associated with each issue. I have personally reviewed the invoices on behalf of AEP Texas.
8. I reviewed the above-referenced invoices taking into consideration the eight factors listed in Rule 1.04(b) of the Texas Disciplinary Rules of Professional Conduct:
 - 1) the time and labor required, novelty and difficulty of the questions involved and the skill requisite to perform the legal services properly;
 - 2) the likelihood that acceptance of employment will preclude other employment by the attorney;
 - 3) the fee customarily charged in the locality for similar legal services;
 - 4) the amount of time involved and result achieved;
 - 5) time limitation imposed by the client or by the circumstances;
 - 6) the nature and length of the professional relationship with the client;
 - 7) the experience, reputation and ability of the lawyers performing the services; and
 - 8) whether the fee is fixed or contingent on results or uncertainty of collection before the legal services have been rendered.



9. I considered the factors delineated by the Third Court of Appeals in *City of El Paso v. Public Utility Comm'n of Texas*, 916 S.W.2d 515 (Tex. App.—Austin 1995, writ dismissed by agr.):

- 1) Time and labor required;
- 2) nature and complexity of the case;
- 3) amount of money or value of property or interest at stake;
- 4) extent of responsibilities the attorney assumes;
- 5) whether the attorney loses other employment because of the undertaking; and
- 6) benefits to the client from the services.

10. I also considered the relevant criteria relating to the reasonableness of rate case expenses in 16 Tex. Admin. Code (TAC) § 25.245(b):

- 1) the nature, extent, and difficulty of the work done by the attorney or other professional in the rate case;
- 2) the time and labor required and expended by the attorney or other professional;
- 3) the fees or other consideration paid to the attorney or other professional for the services rendered;
- 4) the expenses incurred for lodging, meals and beverages, transportation, or other services or materials;
- 5) the nature and scope of the rate case, including:
 - A. the size of the utility and number and type of consumers served;
 - B. the amount of money or value of property or interest at stake;
 - C. the novelty or complexity of the issues addressed;
 - D. the amount and complexity of discovery;
 - E. the occurrence and length of a hearing; and
- 6) the specific issue or issues in the rate case and the amount of rate-case expenses reasonably associated with each issue.

11. As noted above, I am familiar with the rates for utility regulatory work in Texas and elsewhere. Generally speaking, the rates charged by an individual lawyer typically vary based on the level of experience possessed by the lawyer performing the work, the size and reputation of the law firm in which the lawyer works, and the technical nature of the work performed. While the hourly rate charged by outside counsel for work in this case is an important factor, it is only one of many important factors to be considered. Equally important are factors such as the number of hours worked, the complexity of the issues involved, and the experience of the lawyers involved. That is, an experienced lawyer in a complex case with an hourly rate at the high end of the range may be more able to more efficiently do the work than a less experienced lawyer with an hourly rate at the low- or mid-point of the hourly rate range, such that the total amount paid at the end of the day is



reasonable, even if the hourly rates are at the high end of the range. Similarly, a lawyer working at an hourly rate at the low- or mid-point range may have spent so many hours on a matter that the total amount paid is not reasonable, even though the rate is low.

12. I am familiar with many regulatory lawyers in the Texas bar, and the lawyers at DWMR enjoy excellent reputations for providing a high level of quality work on both complex and routine matters. DWMR works on matters of significant importance to its utility clients. In my experience, the hourly rates of DWMR for work done in Docket No. 49592 are consistent with other Texas lawyers performing similar work in Texas. Rates for lawyers at the PUCT, in my experience, have recently ranged, depending on the experience of the lawyer between \$230 to more than \$700 (and sometimes more for very specialized subject matters, like regulatory tax work). The rates for DWMR work in Docket No. 49592 are in the expected range.
13. The rates charged by DWMR for Docket No. 49592 were the same hourly rates the law firm charged for AEP Texas and its affiliates for other matters of which I am familiar, including matters for which rate case expense reimbursement was not available.
14. In my opinion, the hourly rates charged by DWMR in Docket No. 49592 are reasonable and in the range of rates charged in Texas by firms with the same level of depth and expertise. Similarly, in my opinion, the other expenses charged by DWMR (i.e. copying, delivery service, etc.) are also reasonable and in line with costs charged by other law firms providing these types of legal services.
15. With respect to 16 TAC § 25.245(b) and (c) that relate to the determination of the reasonableness and necessity of the rate case expenses AEP Texas seeks to recover, the following information is relevant:
 - 1) The rate case expense documentation AEP Texas is filing shows that the fees paid to, tasks performed by, and time spent on a task by an attorney or other professional in these cases is not extreme or excessive;
 - 2) The rate case expense documentation AEP Texas is filing shows that the expenses incurred for any lodging, meals and beverages, transportation, or other services or materials were not extreme or excessive;



- 3) AEP Texas' application, testimony, and related material in Docket No. 49592 as well as the rate case documentation AEP Texas is filing show there was no unnecessary duplication of services or testimony;
 - 4) AEP Texas' application, testimony, and related materials show that AEP Texas' EECRF application has a reasonable basis in law, policy, and fact, and is warranted based on PUCT precedent in prior EECRF cases;
 - 5) AEP Texas' rate case expenses in Docket No. 49592 as a whole are not disproportionate, excessive, or unwarranted in relation to the nature and scope of the case addressed by the evidence pursuant to 16 TAC § 25.245(b) for the reasons noted above; and
 - 6) Given the rate case expense documentation AEP Texas is filing, AEP Texas did not fail to comply with the requirement for providing sufficient information pursuant to 16 TAC § 25.245(b).
16. Based on my experience and after considering the factors listed in paragraphs 8, 9, 10 above, the \$35,403.69 in rate case expenses incurred by AEP Texas in Docket No. 49592 were reasonable and necessary for the work performed.

Melissa Gage

Melissa A. Gage

SUBSCRIBED AND SWORN TO BEFORE ME, a Notary Public, in and for the State of Ohio, this 26th day of May 2020.

S. Smith

Notary Public in and for the State of Ohio



Header Information

Invoice Number: 30970
Vendor: Duggins Wren Mann & Romero, LLP
Address: 600 Congress Ave Suite 1900, Austin, TX, 78701, United States of America
Tax ID: 27-5110427
Invoice Date: 04/11/2019
Received Date: 04/17/2019
Project: AEPD056092-AEP Texas EECRF
Posting Status: Posted

Billing Start Date: 03/04/2019
Billing End Date: 03/31/2019

Submitted Total: \$1,273
Submitted Currency: USD
Tax Rate: 0%
PS Voucher: 02402411
Approved Total: \$1,273

Invoice Summary

Type	Rate x Units	Discount	AEP Disc	Adjustment	AEP Split	Tax	Amount
Fees	1,273	0	0	0	0	0	1,273
Expenses	0	0	N/A	0	0	0	0
Invoice Total	1,273	0	0	0	0	0	1,273

Line Items

Item	Date	Type	Category	TK	Rate	Units	Disc	Adj	Amt
1	03/04/2019	Fee	L120 Analysis/Strategy	Pearsall, Patrick	335	0.1	0	0	33.5
Activity: A106 Communicate (with client) Description: Analysis/Strategy Communicate with client M. Gage re EEPR and EECRF strategy									
2	03/07/2019	Fee	L120 Analysis/Strategy	Pearsall, Patrick	335	0.2	0	0	67
Activity: A104 Review/analyze Description: Analysis/Strategy Review/Analyze proposed order adopting revisions to EECRF and EEPR substantive rules									
3	03/12/2019	Fee	L120 Analysis/Strategy	Pearsall, Patrick	335	0.1	0	0	33.5
Activity: A106 Communicate (with client) Description: Analysis/Strategy Communicate with client M. Gage and litigation team re preparation of EEPR									
4	03/12/2019	Fee	L210 Pleadings	Pearsall, Patrick	335	0.4	0	0	134
Activity: A104 Review/analyze Description: Pleadings Review/Analyze EEPR									
5	03/13/2019	Fee	L210 Pleadings	Pearsall, Patrick	335	0.8	0	0	268
Activity: A104 Review/analyze Description: Pleadings Review/Analyze issues re EEPR									
6	03/13/2019	Fee	L210 Pleadings	Pearsall, Patrick	335	0.8	0	0	268
Activity: A106 Communicate (with client) Description: Pleadings Communicate with client M. Gage and litigation support team re draft EEPR									
7	03/14/2019	Fee	L120 Analysis/Strategy	Pearsall, Patrick	335	0.2	0	0	67
Activity: A104 Review/analyze Description: Analysis/Strategy Review/Analyze revisions to EECRF and EEPR rules									
8	03/20/2019	Fee	L210 Pleadings	Pearsall, Patrick	335	0.3	0	0	100.5
Activity: A104 Review/analyze Description: Pleadings Review/Analyze revisions to EEPR									
9	03/25/2019	Fee	L210 Pleadings	Pearsall, Patrick	335	0.7	0	0	234.5
Activity: A104 Review/analyze Description: Pleadings Review/Analyze final revisions to EEPR									
10	03/25/2019	Fee	L120 Analysis/Strategy	Pearsall, Patrick	335	0.2	0	0	67
Activity: A106 Communicate (with client) Description: Analysis/Strategy Communicate with client M. Gage re EEPR									

Completed Requests

Item	Request Name	Requestor	Request Date	Completion Date	Comment	Outcome
1	Post Invoice for 1,273.00 USD	Duggins Wren Mann & Romero, LLP	04/17/2019	04/17/2019		Approved
Approval History						

	Stop	Performer	Activity	Date/Time	Internal Comment
	1	Ryan, Rhonda C	Approved	04/17/2019 10:22 AM	

Header Information

Invoice Number: 31248	Billing Start Date: 04/04/2019
Vendor: Duggins Wren Mann & Romero, LLP	Billing End Date: 04/30/2019
Address: 600 Congress Ave Suite 1900, Austin, TX, 78701, United States of America	
Tax ID: 27-5110427	
Invoice Date: 05/13/2019	Submitted Total: \$711 5
Received Date: 05/13/2019	Submitted Currency: USD
Project: AEPD056092-AEP Texas EECRF	Tax Rate: 0%
Posting Status: Posted	PS Voucher: 02407034
	Approved Total: \$711 5

Invoice Summary

Type	Rate x Units	Discount	AEP Disc	Adjustment	AEP Split	Tax	Amount
Fees	711 5	0	0	0	0	0	711 5
Expenses	0	0	N/A	0	0	0	0
Invoice Total	711 5	0	0	0	0	0	711 5

Line Items

Item	Date	Type	Category	TK	Rate	Units	Disc	Adj	Amt
1	04/04/2019	Fee	L120 Analysis/Strategy	Pearsall, Patrick	335	0 1	0	0	33 5
	Activity: A104 Review/analyze Description: Analysis/Strategy Review/Analyze communication with litigation team regarding strategy for filing preparation								
2	04/12/2019	Fee	L210 Pleadings	Pearsall, Patrick	335	0 7	0	0	234 5
	Activity: A104 Review/analyze Description: Pleadings Review/Analyze application								
3	04/15/2019	Fee	L210 Pleadings	Pearsall, Patrick	335	0 3	0	0	100 5
	Activity: A103 Draft/revise Description: Pleadings Draft/Revise application								
4	04/15/2019	Fee	L210 Pleadings	Pearsall, Patrick	335	0 2	0	0	67
	Activity: A106 Communicate (with client) Description: Pleadings Communicate with client M Gage re application								
5	04/15/2019	Fee	L210 Pleadings	Green, Stephanie	230	1 2	0	0	276
	Activity: A104 Review/analyze Description: Pleadings Review/Analyze and cite check EECRF draft application								

Completed Requests

Item	Request Name	Requestor	Request Date	Completion Date	Comment	Outcome
1	Post Invoice for 711.50 USD	Duggins Wren Mann & Romero, LLP	05/13/2019	05/14/2019		Approved
	Approval History					
	Stop	Performer	Activity	Date/Time	Internal Comment	
	1	Ryan, Rhonda C	Approved	05/14/2019 07:42 AM		

Header Information

Invoice Number: 31469
Vendor: Duggins Wren Mann & Romero, LLP
Address: 600 Congress Ave Suite 1900, Austin, TX, 78701, United States of America
Tax ID: 27-5110427
Invoice Date: 06/11/2019
Received Date: 06/11/2019
Project: AEPD056092-AEP Texas EECRF
Posting Status: Posted

Billing Start Date: 05/01/2019
Billing End Date: 05/31/2019

Submitted Total: \$12,082
Submitted Currency: USD
Tax Rate: 0%
PS Voucher: 02420466
Approved Total: \$11,477.91

Invoice Summary

Type	Rate x Units	Discount	AEP Disc	Adjustment	AEP Split	Tax	Amount
Fees	12,082	0	604.09	0	0	0	11,477.91
Expenses	0	0	N/A	0	0	0	0
Invoice Total	12,082	0	604.09	0	0	0	11,477.91

Line Items

Item	Date	Type	Category	TK	Rate	Units	Disc	Adj	Amt
1	05/01/2019	Fee	L410 Fact Witnesses	Pearsall, Patrick	335	1.1	18.42	18.42	350.08
	Activity: A106 Communicate (with client)								
	Description: Fact Witnesses Communicate with client M. Gage and litigation team re issues with testimony strategy								
	Adjustment: 06/11/2019 - Amount adjusted by 18.42 - system, system								
	Reason for Adjustment: Discount Agreement								
2	05/02/2019	Fee	L410 Fact Witnesses	Green, Stephanie	230	1.6	18.4	18.4	349.6
	Activity: A104 Review/analyze								
	Description: Fact Witnesses Review/Analyze EECRF draft testimonies of J. Jackson and P. Osterloh								
	Adjustment: 06/11/2019 - Amount adjusted by 18.4 - system, system								
	Reason for Adjustment: Discount Agreement								
3	05/02/2019	Fee	L410 Fact Witnesses	Pearsall, Patrick	335	2.3	38.52	38.52	731.98
	Activity: A106 Communicate (with client)								
	Description: Fact Witnesses Communicate with client M. Gage and litigation team re direct testimony and revisions thereto								
	Adjustment: 06/11/2019 - Amount adjusted by 38.52 - system, system								
	Reason for Adjustment: Discount Agreement								
4	05/02/2019	Fee	L410 Fact Witnesses	Pearsall, Patrick	335	1.9	31.82	31.82	604.68
	Activity: A104 Review/analyze								
	Description: Fact Witnesses Review/Analyze issues re testimony.								
	Adjustment: 06/11/2019 - Amount adjusted by 31.82 - system, system								
	Reason for Adjustment: Discount Agreement								
5	05/03/2019	Fee	L410 Fact Witnesses	Green, Stephanie	230	2.7	31.05	31.05	589.95
	Activity: A104 Review/analyze								
	Description: Fact Witnesses Review/Analyze and cite check EECRF draft testimonies of P. Osterloh, R. Fahrlander and R. Cavazos								
	Adjustment: 06/11/2019 - Amount adjusted by 31.05 - system, system								
	Reason for Adjustment: Discount Agreement								
6	05/03/2019	Fee	L410 Fact Witnesses	Pearsall, Patrick	335	1.7	28.48	28.48	541.02
	Activity: A104 Review/analyze								
	Description: Fact Witnesses Review/Analyze issues re scope and strategy of direct testimony								
	Adjustment: 06/11/2019 - Amount adjusted by 28.48 - system, system								
	Reason for Adjustment: Discount Agreement								
7	05/06/2019	Fee	L410 Fact Witnesses	Pearsall, Patrick	335	1.5	25.12	25.12	477.38
	Comments to Requestor: 5% discount to vendor fees per billing discount agreement								

8	Activity: A104 Review/analyze Description: Fact Witnesses Review/Analyze issues re revisions to direct testimony Adjustment: 06/11/2019 - Amount adjusted by 25 12 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 5% discount to vendor fees per billing discount agreement								
	05/07/2019	Fee	L410 Fact Witnesses	Pearsall, Patrick	335	2 4	40 2	40 2	763 8
9	Activity: A104 Review/analyze Description: Fact Witnesses Review/Analyze issues re J Jackson testimony Adjustment: 06/11/2019 - Amount adjusted by 40 2 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 5% discount to vendor fees per billing discount agreement								
	05/08/2019	Fee	L410 Fact Witnesses	Pearsall, Patrick	335	2 3	38 52	38 52	731 98
10	Activity: A104 Review/analyze Description: Fact Witnesses Review/Analyze issues re J Jackson direct testimony. Adjustment: 06/11/2019 - Amount adjusted by 38 52 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 5% discount to vendor fees per billing discount agreement								
	05/08/2019	Fee	L410 Fact Witnesses	Green, Stephanie	230	0 6	6 9	6 9	131 1
11	Activity: A104 Review/analyze Description: Fact Witnesses Review/Analyze revised J Jackson testimony and cite check same Adjustment: 06/11/2019 - Amount adjusted by 6 9 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 5% discount to vendor fees per billing discount agreement								
	05/14/2019	Fee	L410 Fact Witnesses	Pearsall, Patrick	335	1 6	26 8	26 8	509 2
12	Activity: A104 Review/analyze Description: Fact Witnesses Review/Analyze J Jackson, R Fahrlender, B Lysiak, and R Cavazos testimony Adjustment: 06/11/2019 - Amount adjusted by 26 8 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 5% discount to vendor fees per billing discount agreement								
	05/14/2019	Fee	L410 Fact Witnesses	Pearsall, Patrick	335	0 2	3 35	3 35	63 65
13	Activity: A106 Communicate (with client) Description: Fact Witnesses Communicate with client M Gage re direct testimony Adjustment: 06/11/2019 - Amount adjusted by 3 35 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 5% discount to vendor fees per billing discount agreement								
	05/15/2019	Fee	L410 Fact Witnesses	Pearsall, Patrick	335	0 3	5 02	5 02	95 48
14	Activity: A106 Communicate (with client) Description: Fact Witnesses Communicate with client M. Gage and C Rinehart re testimony strategy Adjustment: 06/11/2019 - Amount adjusted by 5 02 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 5% discount to vendor fees per billing discount agreement								
	05/15/2019	Fee	L410 Fact Witnesses	Pearsall, Patrick	335	1 6	26 8	26 8	509 2
15	Activity: A106 Communicate (with client) Description: Fact Witnesses Communicate with client witnesses and litigation team re testimony review Adjustment: 06/11/2019 - Amount adjusted by 26 8 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 5% discount to vendor fees per billing discount agreement								
	05/15/2019	Fee	L410 Fact Witnesses	Pearsall, Patrick	335	0 3	5 02	5 02	95 48
16	Activity: A104 Review/analyze Description: Fact Witnesses Review/Analyze P Osterloh direct testimony Adjustment: 06/11/2019 - Amount adjusted by 5 02 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 5% discount to vendor fees per billing discount agreement								
	05/21/2019	Fee	L410 Fact Witnesses	Pearsall, Patrick	335	0 1	1 68	1 68	31 82
16	Activity: A106 Communicate (with client) Description: Fact Witnesses Communicate with client C Rinehart re testimony and schedules Adjustment: 06/11/2019 - Amount adjusted by 1 68 - system, system								

	Reason for Adjustment: Discount Agreement Comments to Requestor: 5% discount to vendor fees per billing discount agreement								
17	05/22/2019	Fee	L410 Fact Witnesses	Pearsall, Patrick	335	0 2	3 35	3 35	63 65
	Activity: A106 Communicate (with client) Description: Fact Witnesses Communicate with client C Rinehart re direct testimony Adjustment: 06/11/2019 - Amount adjusted by 3 35 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 5% discount to vendor fees per billing discount agreement								
18	05/22/2019	Fee	L120 Analysis/Strategy	Pearsall, Patrick	335	0 1	1 68	1 68	31 82
	Activity: A104 Review/analyze Description: Analysis/Strategy Review/Analyze revised preliminary order. Adjustment: 06/11/2019 - Amount adjusted by 1 68 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 5% discount to vendor fees per billing discount agreement								
19	05/22/2019	Fee	L410 Fact Witnesses	Green, Stephanie	230	2 3	26 45	26 45	502 55
	Activity: A104 Review/analyze Description: Fact Witnesses Review/Analyze testimony and schedules, verify references, cross references and figures Adjustment: 06/11/2019 - Amount adjusted by 26 45 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 5% discount to vendor fees per billing discount agreement								
20	05/23/2019	Fee	L410 Fact Witnesses	Green, Stephanie	230	3 1	35 65	35 65	677 35
	Activity: A104 Review/analyze Description: Fact Witnesses Review/Analyze testimony and schedules, verify references, cross references and figures Adjustment: 06/11/2019 - Amount adjusted by 35 65 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 5% discount to vendor fees per billing discount agreement								
21	05/23/2019	Fee	L410 Fact Witnesses	Pearsall, Patrick	335	3 7	61 98	61 98	1,177 52
	Activity: A104 Review/analyze Description: Fact Witnesses Review/Analyze direct testimony and supporting schedules Adjustment: 06/11/2019 - Amount adjusted by 61 98 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 5% discount to vendor fees per billing discount agreement								
22	05/24/2019	Fee	L410 Fact Witnesses	Pearsall, Patrick	335	1 2	20 1	20 1	381 9
	Activity: A106 Communicate (with client) Description: Fact Witnesses Communicate with client litigation team re review of testimony and schedules Adjustment: 06/11/2019 - Amount adjusted by 20.1 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 5% discount to vendor fees per billing discount agreement								
23	05/27/2019	Fee	L210 Pleadings	Pearsall, Patrick	335	0 8	13 4	13 4	254 6
	Activity: A103 Draft/revise Description: Pleadings Draft/Revise application Adjustment: 06/11/2019 - Amount adjusted by 13 4 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 5% discount to vendor fees per billing discount agreement								
24	05/27/2019	Fee	L120 Analysis/Strategy	Pearsall, Patrick	335	0 2	3 35	3 35	63 65
	Activity: A106 Communicate (with client) Description: Analysis/Strategy Communicate with client S Zahala re status of testimony and application Adjustment: 06/11/2019 - Amount adjusted by 3 35 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 5% discount to vendor fees per billing discount agreement								
25	05/28/2019	Fee	L410 Fact Witnesses	Pearsall, Patrick	335	1 9	31 82	31 82	604 68
	Activity: A104 Review/analyze Description: Fact Witnesses Review/Analyze direct testimony Adjustment: 06/11/2019 - Amount adjusted by 31 82 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 5% discount to vendor fees per billing discount agreement								
26	05/28/2019	Fee	L410 Fact Witnesses	Pearsall, Patrick	335	0 4	6 7	6 7	127 3

	Activity: A106 Communicate (with client) Description: Fact Witnesses Communicate with client C Rinehart re issues with testimony and application Adjustment: 06/11/2019 - Amount adjusted by 6 7 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 5% discount to vendor fees per billing discount agreement								
27	05/29/2019	Fee	L120 Analysis/Strategy	Pearsall, Patrick	335	0 5	8 38	8 38	159 12
	Activity: A106 Communicate (with client) Description: Analysis/Strategy Communicate with client C Rinehart, S Zahala, and G Gullickson re testimony, application, and filing strategy Adjustment: 06/11/2019 - Amount adjusted by 8 38 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 5% discount to vendor fees per billing discount agreement								
28	05/30/2019	Fee	L140 Document/File Management	Jones, Jackie	140	0 2	1 4	1 4	26 6
	Activity: A104 Review/analyze Description: Document/File Management Review/Analyze standard protective order Adjustment: 06/11/2019 - Amount adjusted by 1 4 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 5% discount to vendor fees per billing discount agreement								
29	05/30/2019	Fee	L210 Pleadings	Green, Stephanie	230	0 1	1 15	1 15	21 85
	Activity: A104 Review/analyze Description: Pleadings Review/Analyze revised petition for review for filing Adjustment: 06/11/2019 - Amount adjusted by 1 15 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 5% discount to vendor fees per billing discount agreement								
30	05/30/2019	Fee	L210 Pleadings	Green, Stephanie	230	2 1	24 15	24 15	458 85
	Activity: A104 Review/analyze Description: Pleadings Review/Analyze application and internal references, attachments, confirm figures Adjustment: 06/11/2019 - Amount adjusted by 24 15 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 5% discount to vendor fees per billing discount agreement								
31	05/30/2019	Fee	L210 Pleadings	Pearsall, Patrick	335	0 5	8 38	8 38	159 12
	Activity: A106 Communicate (with client) Description: Pleadings Communicate with client C Rinehart, G Gullickson, and S Zavala re application and filing strategy Adjustment: 06/11/2019 - Amount adjusted by 8 38 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 5% discount to vendor fees per billing discount agreement								
32	05/30/2019	Fee	L210 Pleadings	Pearsall, Patrick	335	0 6	10 05	10 05	190 95
	Activity: A104 Review/analyze Description: Pleadings Review/Analyze application Adjustment: 06/11/2019 - Amount adjusted by 10 05 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 5% discount to vendor fees per billing discount agreement								

Completed Requests

Item	Request Name	Requestor	Request Date	Completion Date	Comment	Outcome
1	Post Invoice for 11,477 91 USD	Duggins Wren Mann & Romero, LLP	06/11/2019	06/12/2019		Approved
	Approval History					
	Stop	Performer	Activity	Date/Time	Internal Comment	
	1	Ryan, Rhonda C	Approved	06/12/2019 10.22 AM		

Header Information

Invoice Number: 31775
Vendor: Duggins Wren Mann & Romero, LLP
Address: 600 Congress Ave Suite 1900, Austin, TX, 78701, United States of America
Tax ID: 27-5110427
Invoice Date: 07/11/2019
Received Date: 07/11/2019
Project: AEPD056092-AEP Texas EECRF
Posting Status: Posted

Billing Start Date: 06/03/2019
Billing End Date: 06/30/2019

Submitted Total: \$2,954 5
Submitted Currency: USD
Tax Rate: 0%
PS Voucher: 02435024
Approved Total: \$2,749 36

Invoice Summary

Type	Rate x Units	Discount	AEP Disc	Adjustment	AEP Split	Tax	Amount
Fees	2,930 5	0	205 14	0	0	0	2,725 36
Expenses	24	0	N/A	0	0	0	24
Invoice Total	2,954 5	0	205 14	0	0	0	2,749 36

Line Items

Item	Date	Type	Category	TK	Rate	Units	Disc	Adj	Amt
1	06/03/2019	Fee	L210 Pleadings	Pearsall, Patrick	335	0 2	4 69	4 69	62 31
	Activity: A106 Communicate (with client)								
	Description: Pleadings Communicate with client S Zahala re supplement to filing package								
	Adjustment: 07/11/2019 - Amount adjusted by 4 69 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 7% discount to vendor fees per billing discount agreement								
2	06/03/2019	Fee	L210 Pleadings	Pearsall, Patrick	335	0 1	2 34	2 34	31.16
	Activity: A104 Review/analyze								
	Description: Pleadings Review/Analyze order of referral								
	Adjustment: 07/11/2019 - Amount adjusted by 2 34 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 7% discount to vendor fees per billing discount agreement								
3	06/03/2019	Fee	L210 Pleadings	Pearsall, Patrick	335	0 2	4 69	4 69	62 31
	Activity: A106 Communicate (with client)								
	Description: Pleadings Communicate with client S Zahala re order of referral								
	Adjustment: 07/11/2019 - Amount adjusted by 4 69 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 7% discount to vendor fees per billing discount agreement								
4	06/05/2019	Fee	L210 Pleadings	Green, Stephanie	230	0 4	6 44	6.44	85 56
	Activity: A104 Review/analyze								
	Description: Pleadings Review/Analyze revised draft brief, comments and correspondence re same								
	Adjustment: 07/11/2019 - Amount adjusted by 6 44 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 7% discount to vendor fees per billing discount agreement								
5	06/05/2019	Fee	L250 Other Written Motions/Submissions	Green, Stephanie	230	1 1	17 71	17 71	235 29
	Activity: A104 Review/analyze								
	Description: Other Written Motions and Submissions Review/Analyze and work on procedural schedule, documents and timing for procedural events								
	Adjustment: 07/11/2019 - Amount adjusted by 17 71 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 7% discount to vendor fees per billing discount agreement								
6	06/05/2019	Fee	L210 Pleadings	Green, Stephanie	230	0 6	9 66	9 66	128 34
	Activity: A103 Draft/revise								
	Description: Pleadings Draft/Revise proposed list of issues								
	Adjustment: 07/11/2019 - Amount adjusted by 9 66 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 7% discount to vendor fees per billing discount agreement								
7	06/05/2019	Fee	L210 Pleadings	Jones,	140	0 3	2 94	2 94	39 06

			Jackie						
	Activity: A104 Review/analyze Description: Pleadings Review/Analyze Order No 1 and calendar deadlines established within Adjustment: 07/11/2019 - Amount adjusted by 2 94 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 7% discount to vendor fees per billing discount agreement								
8	06/05/2019	Fee	L120 Analysis/Strategy	Pearsall, Patrick	335	0.1	2 34	2 34	31 16
	Activity: A104 Review/analyze Description: Analysis/Strategy Review/Analyze SOAH Order No 1 Adjustment: 07/11/2019 - Amount adjusted by 2 34 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 7% discount to vendor fees per billing discount agreement								
9	06/06/2019	Fee	L210 Pleadings	Green, Stephanie	230	1 2	19 32	19 32	256 68
	Activity: A103 Draft/revise Description: Pleadings Draft/Revise proposed list of issues and verify revised rule citations Adjustment: 07/11/2019 - Amount adjusted by 19 32 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 7% discount to vendor fees per billing discount agreement								
10	06/06/2019	Fee	L250 Other Written Motions/Submissions	Green, Stephanie	230	0 9	14 49	14 49	192 51
	Activity: A103 Draft/revise Description: Other Written Motions and Submissions Draft/Revise proposed schedule Adjustment: 07/11/2019 - Amount adjusted by 14 49 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 7% discount to vendor fees per billing discount agreement								
11	06/06/2019	Fee	L320 Document Production	Green, Stephanie	230	0 6	9 66	9 66	128 34
	Activity: A104 Review/analyze Description: Document Production Review/Analyze confidential documents and bases for confidentiality and prepare draft re same Adjustment: 07/11/2019 - Amount adjusted by 9 66 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 7% discount to vendor fees per billing discount agreement								
12	06/06/2019	Fee	L120 Analysis/Strategy	Pearsall, Patrick	335	0 2	4 69	4 69	62 31
	Activity: A104 Review/analyze Description: Analysis/Strategy Review/Analyze issues re procedural schedule Adjustment: 07/11/2019 - Amount adjusted by 4 69 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 7% discount to vendor fees per billing discount agreement								
13	06/06/2019	Fee	L120 Analysis/Strategy	Pearsall, Patrick	335	0 3	7 04	7 04	93 46
	Activity: A104 Review/analyze Description: Analysis/Strategy Review/Analyze issues re proposed list of issues. Adjustment: 07/11/2019 - Amount adjusted by 7 04 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 7% discount to vendor fees per billing discount agreement								
14	06/07/2019	Fee	L120 Analysis/Strategy	Pearsall, Patrick	335	0 2	4 69	4 69	62 31
	Activity: A108 Communicate (other external) Description: Analysis/Strategy Communicate with other external Staff counsel H Armstrong, Cities' counsel J Mauldin re procedural schedule issues Adjustment: 07/11/2019 - Amount adjusted by 4 69 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 7% discount to vendor fees per billing discount agreement								
15	06/07/2019	Fee	L120 Analysis/Strategy	Pearsall, Patrick	335	0 3	7.04	7 04	93 46
	Activity: A104 Review/analyze Description: Analysis/Strategy Review/Analyze issues re procedural schedule Adjustment: 07/11/2019 - Amount adjusted by 7 04 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 7% discount to vendor fees per billing discount agreement								
16	06/07/2019	Fee	L120 Analysis/Strategy	Pearsall, Patrick	335	0 2	4 69	4 69	62 31
	Activity: A104 Review/analyze Description: Analysis/Strategy Review/Analyze issues re proposed list of issues								

	Adjustment: 07/11/2019 - Amount adjusted by 4 69 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 7% discount to vendor fees per billing discount agreement								
17	06/10/2019	Fee	L210 Pleadings	Green, Stephanie	230	0 1	1 61	1 61	21.39
	Activity: A104 Review/analyze Description: Pleadings Review/Analyze client correspondence re draft proposed list of issues Adjustment: 07/11/2019 - Amount adjusted by 1 61 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 7% discount to vendor fees per billing discount agreement								
18	06/10/2019	Fee	L120 Analysis/Strategy	Pearsall, Patrick	335	0 2	4 69	4 69	62 31
	Activity: A106 Communicate (with client) Description: Analysis/Strategy Communicate with client C Rinehart and S Zahala re proposed list of issues Adjustment: 07/11/2019 - Amount adjusted by 4 69 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 7% discount to vendor fees per billing discount agreement								
19	06/11/2019	Fee	L120 Analysis/Strategy	Pearsall, Patrick	335	0 7	16 42	16 42	218 08
	Activity: A108 Communicate (other external) Description: Analysis/Strategy Communicate with other external litigation team re procedural schedule negotiations with Staff and intervenors Adjustment: 07/11/2019 - Amount adjusted by 16 42 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 7% discount to vendor fees per billing discount agreement								
20	06/11/2019	Fee	L120 Analysis/Strategy	Pearsall, Patrick	335	0.3	7 04	7 04	93 46
	Activity: A108 Communicate (other external) Description: Analysis/Strategy Communicate with other external Staff counsel H Armstrong and Cities counsel J Mauldin re procedural schedule Adjustment: 07/11/2019 - Amount adjusted by 7 04 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 7% discount to vendor fees per billing discount agreement								
21	06/11/2019	Fee	L210 Pleadings	Pearsall, Patrick	335	0 2	4 69	4 69	62 31
	Activity: A104 Review/analyze Description: Pleadings Review/Analyze Staff's proposed list of issues Adjustment: 07/11/2019 - Amount adjusted by 4 69 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 7% discount to vendor fees per billing discount agreement								
22	06/12/2019	Fee	L120 Analysis/Strategy	Pearsall, Patrick	335	0 2	4 69	4 69	62 31
	Activity: A106 Communicate (with client) Description: Analysis/Strategy Communicate with client C Rinehart and S Zahala re issues with procedural schedule proposal and proposed list of issues Adjustment: 07/11/2019 - Amount adjusted by 4 69 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 7% discount to vendor fees per billing discount agreement								
23	06/12/2019	Fee	L210 Pleadings	Pearsall, Patrick	335	0.2	4 69	4 69	62 31
	Activity: A103 Draft/revise Description: Pleadings Draft/Revise and finalize agreed procedural schedule and proposed list of issues for filing Adjustment: 07/11/2019 - Amount adjusted by 4 69 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 7% discount to vendor fees per billing discount agreement								
24	06/14/2019	Fee	L310 Written Discovery	Pearsall, Patrick	335	0 1	2 34	2.34	31 16
	Activity: A104 Review/analyze Description: Written Discovery Review/Analyze Staff's 1st set of RFIs Adjustment: 07/11/2019 - Amount adjusted by 2.34 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 7% discount to vendor fees per billing discount agreement								
25	06/14/2019	Fee	L120 Analysis/Strategy	Pearsall, Patrick	335	0 2	4 69	4.69	62.31
	Activity: A108 Communicate (other external) Description: Analysis/Strategy Communicate with other external TIEC counsel J Zhu re procedural schedule								

Adjustment: 07/11/2019 - Amount adjusted by 4 69 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 7% discount to vendor fees per billing discount agreement									
26	06/14/2019	Fee	L210 Pleadings	Jones, Jackie	140	0 2	1 96	1 96	26 04
	Activity: A104 Review/analyze Description: Pleadings Review/Analyze SOAH Order No 2 and update procedural calendar re same Adjustment: 07/11/2019 - Amount adjusted by 1 96 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 7% discount to vendor fees per billing discount agreement								
27	06/24/2019	Fee	L250 Other Written Motions/Submissions	Green, Stephanie	230	0 4	6 44	6 44	85 56
	Activity: A104 Review/analyze Description: Other Written Motions and Submissions Review/Analyze and compare preliminary order draft to proposed issues and note changes and new issues Adjustment: 07/11/2019 - Amount adjusted by 6 44 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 7% discount to vendor fees per billing discount agreement								
28	06/25/2019	Fee	L310 Written Discovery	Pearsall, Patrick	335	0 4	9 38	9 38	124 62
	Activity: A104 Review/analyze Description: Written Discovery Review/Analyze responses to Staff's 1st RFIs Adjustment: 07/11/2019 - Amount adjusted by 9 38 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 7% discount to vendor fees per billing discount agreement								
29	06/26/2019	Fee	L310 Written Discovery	Pearsall, Patrick	335	0 4	9 38	9 38	124 62
	Activity: A106 Communicate (with client) Description: Written Discovery Communicate with client litigation team re responses to Staff's 1st RFIs Adjustment: 07/11/2019 - Amount adjusted by 9 38 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 7% discount to vendor fees per billing discount agreement								
30	06/26/2019	Fee	L310 Written Discovery	Pearsall, Patrick	335	0 2	4 69	4 69	62 31
	Activity: A103 Draft/revise Description: Written Discovery Draft/Revise responses to Staff's 1st RFIs Adjustment: 07/11/2019 - Amount adjusted by 4 69 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 7% discount to vendor fees per billing discount agreement								
31	06/12/2019	Expense	E107 Delivery services/messengers		12	1	0	0	12
	Activity: Description: Delivery Services/Messengers Delivery Service to Public Utility Commission of TX								
32	06/12/2019	Expense	E107 Delivery services/messengers		12	1	0	0	12
	Activity: Description: Delivery Services/Messengers Delivery Service from Public Utility Commission of TX								

Completed Requests

Item	Request Name	Requestor	Request Date	Completion Date	Comment	Outcome
1	Post Invoice for 2,749 36 USD	Duggins Wren Mann & Romero, LLP	07/11/2019	07/12/2019		Approved
	Approval History					
	Stop	Performer	Activity	Date/Time	Internal Comment	
	1	Ryan, Rhonda C	Approved	07/12/2019 02 05 PM		



Invoice

Customer Number	1068
Invoice Number	108386
Invoice Date	6/15/2019
Invoice Period	6/9/2019-6/15/2019
Invoice Amount	\$213.56

Date Ready Order Type Deliver Date	Order ID Caller	Origin	Destination	References
6/12/2019 2:16 PM Rush Bike	867580	Duggins Wren Mann & Romero 600 Congress Ave Ste 1900 Austin TX 78701-3348	Public Utility Commission of Tex. 1701 N Congress Ave Austin TX 78701-1494	pjp 12758-467
6/12/2019 3:04 PM	Tammy Mitchell (512) 744-9300			
POD: Puc			Rush Bike	\$12.00 473948
			Order Total:	\$12.00
6/12/2019 2:46 PM Rush Bike	867580 01	Public Utility Commission of Texas 1701 N Congress Ave Austin TX 78701-1494	Duggins Wren Mann & Romero 600 Congress Ave Ste 1900 Austin TX 78701-3348	pjp 12758-467
6/12/2019 3:26 PM	Tammy Mitchell (512) 744-9300			
POD: Talen			Rush Bike	\$12.00 473949
			Order Total:	\$12.00

Header Information

Invoice Number: 31949
Vendor: Duggins Wren Mann & Romero, LLP
Address: 600 Congress Ave Suite 1900, Austin, TX, 78701, United States of America
Tax ID: 27-5110427
Invoice Date: 08/13/2019
Received Date: 08/14/2019
Project: AEPD056092-AEP Texas EECRF
Posting Status: Posted

Billing Start Date: 07/02/2019
Billing End Date: 07/31/2019

Submitted Total: \$3,726.5
Submitted Currency: USD
Tax Rate: 0%
PS Voucher: 02447830
Approved Total: \$3,467.04

Invoice Summary

Type	Rate x Units	Discount	AEP Disc	Adjustment	AEP Split	Tax	Amount
Fees	3,706.5	0	259.46	0	0	0	3,447.04
Expenses	20	0	N/A	0	0	0	20
Invoice Total	3,726.5	0	259.46	0	0	0	3,467.04

Line Items

Item	Date	Type	Category	TK	Rate	Units	Disc	Adj	Amt
1	07/02/2019	Fee	L310 Written Discovery	Jones, Jackie	140	0.1	0.98	0.98	13.02
	Activity: A104 Review/analyze								
	Description: Written Discovery Review/Analyze Cities 1st RFI and update procedural calendar re same								
	Adjustment: 08/14/2019 - Amount adjusted by 0.98 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 7% discount to vendor fees per billing discount agreement								
2	07/09/2019	Fee	L160 Settlement/Non-Binding ADR	Pearsall, Patrick	335	0.8	18.76	18.76	249.24
	Activity: A106 Communicate (with client)								
	Description: Settlement/Non-binding ADR Communicate with client litigation team re strategy and preparation for settlement conference								
	Adjustment: 08/14/2019 - Amount adjusted by 18.76 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 7% discount to vendor fees per billing discount agreement								
3	07/10/2019	Fee	L210 Pleadings	Jones, Jackie	140	0.2	1.96	1.96	26.04
	Activity: A104 Review/analyze								
	Description: Pleadings Review/Analyze SOAH Order No. 3.								
	Adjustment: 08/14/2019 - Amount adjusted by 1.96 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 7% discount to vendor fees per billing discount agreement								
4	07/10/2019	Fee	L160 Settlement/Non-Binding ADR	Pearsall, Patrick	335	0.1	2.34	2.34	31.16
	Activity: A108 Communicate (other external)								
	Description: Settlement/Non-binding ADR Communicate with other external Cities' counsel J. Mauldin re settlement conference scheduling								
	Adjustment: 08/14/2019 - Amount adjusted by 2.34 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 7% discount to vendor fees per billing discount agreement								
5	07/10/2019	Fee	L160 Settlement/Non-Binding ADR	Pearsall, Patrick	335	0.2	4.69	4.69	62.31
	Activity: A106 Communicate (with client)								
	Description: Settlement/Non-binding ADR Communicate with client S. Zahala and C. Rinehart re responses to outstanding RFIs and settlement conference scheduling								
	Adjustment: 08/14/2019 - Amount adjusted by 4.69 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 7% discount to vendor fees per billing discount agreement								
6	07/11/2019	Fee	L160 Settlement/Non-Binding ADR	Pearsall, Patrick	335	0.2	4.69	4.69	62.31
	Activity: A108 Communicate (other external)								
	Description: Settlement/Non-binding ADR Communicate with other external Staff counsel H. Armstrong re settlement conference issues and timing. Adjustment: 08/14/2019 - Amount adjusted by 4.69 - system, system								

Reason for Adjustment: Discount Agreement Comments to Requestor: 7% discount to vendor fees per billing discount agreement									
7	07/11/2019	Fee	L310 Written Discovery	Pearsall, Patnck	335	0 2	4 69	4 69	62 31
	Activity: A103 Draft/revise Description: Written Discovery Draft/Revise responses to Cities' 2nd set of RFIs Adjustment: 08/14/2019 - Amount adjusted by 4 69 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 7% discount to vendor fees per billing discount agreement								
8	07/12/2019	Fee	L160 Settlement/Non-Binding ADR	Pearsall, Patrick	335	0 7	16 42	16 42	218 08
	Activity: A106 Communicate (with client) Description: Settlement/Non-binding ADR Communicate with client litigation team re preparation for settlement conference. Adjustment: 08/14/2019 - Amount adjusted by 16 42 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 7% discount to vendor fees per billing discount agreement								
9	07/12/2019	Fee	L160 Settlement/Non-Binding ADR	Pearsall, Patrick	335	0 5	11 72	11 72	155 78
	Activity: A104 Review/analyze Description: Settlement/Non-binding ADR Review/Analyze potential settlement issues Adjustment: 08/14/2019 - Amount adjusted by 11 72 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 7% discount to vendor fees per billing discount agreement								
10	07/15/2019	Fee	L160 Settlement/Non-Binding ADR	Pearsall, Patnck	335	0 9	21 1	21 1	280 4
	Activity: A104 Review/analyze Description: Settlement/Non-binding ADR Review/Analyze application, testimony, and discovery responses in preparation for settlement conference Adjustment: 08/14/2019 - Amount adjusted by 21 1 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 7% discount to vendor fees per billing discount agreement								
11	07/15/2019	Fee	L160 Settlement/Non-Binding ADR	Pearsall, Patnck	335	0.8	18 76	18 76	249 24
	Activity: A109 Appear for/attend Description: Settlement/Non-binding ADR Appear for/attend telephone settlement conference call and follow up communications w/Staff and counsel for intervenors re potential settlement terms Adjustment: 08/14/2019 - Amount adjusted by 18 76 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 7% discount to vendor fees per billing discount agreement								
12	07/15/2019	Fee	L160 Settlement/Non-Binding ADR	Pearsall, Patnck	335	0 5	11 72	11.72	155 78
	Activity: A106 Communicate (with client) Description: Settlement/Non-binding ADR Communicate with client S Zahala, C Rinehart and litigation team re settlement conference Adjustment: 08/14/2019 - Amount adjusted by 11 72 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 7% discount to vendor fees per billing discount agreement								
13	07/16/2019	Fee	L310 Written Discovery	Jones, Jackie	140	0 1	0 98	0 98	13 02
	Activity: A104 Review/analyze Description: Written Discovery Review/Analyze Cities 2nd RFI and update procedural calendar re same Adjustment: 08/14/2019 - Amount adjusted by 0.98 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 7% discount to vendor fees per billing discount agreement								
14	07/16/2019	Fee	L160 Settlement/Non-Binding ADR	Pearsall, Patnck	335	0 6	14 07	14 07	186.93
	Activity: A106 Communicate (with client) Description: Settlement/Non-binding ADR Communicate with client litigation team re proposed stipulation amount and Cities' settlement-related discovery Adjustment: 08/14/2019 - Amount adjusted by 14 07 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 7% discount to vendor fees per billing discount agreement								
15	07/16/2019	Fee	L160 Settlement/Non-Binding ADR	Pearsall, Patrick	335	0 4	9 38	9 38	124 62
	Activity: A108 Communicate (other external) Description: Settlement/Non-binding ADR Communicate with other external Cities' counsel J Mauldin re stipulation and related RFIs Adjustment: 08/14/2019 - Amount adjusted by 9 38 - system, system								

	Reason for Adjustment: Discount Agreement Comments to Requestor: 7% discount to vendor fees per billing discount agreement								
16	07/17/2019	Fee	L310 Written Discovery	Pearsall, Patrick	335	0 3	7 04	7 04	93 46
	Activity: A103 Draft/revise Description: Written Discovery Draft/Revise information discovery response to Cities' 2nd RFIs Adjustment: 08/14/2019 - Amount adjusted by 7 04 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 7% discount to vendor fees per billing discount agreement								
17	07/17/2019	Fee	L310 Written Discovery	Pearsall, Patrick	335	0 4	9 38	9 38	124 62
	Activity: A106 Communicate (with client) Description: Written Discovery Communicate with client litigation team re strategy for response to Cities' informal discovery requests Adjustment: 08/14/2019 - Amount adjusted by 9 38 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 7% discount to vendor fees per billing discount agreement								
18	07/17/2019	Fee	L310 Written Discovery	Pearsall, Patrick	335	0.2	4 69	4 69	62 31
	Activity: A108 Communicate (other external) Description: Written Discovery Communicate with other external J Mauldin re Cities' informal discovery requests Adjustment: 08/14/2019 - Amount adjusted by 4 69 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 7% discount to vendor fees per billing discount agreement								
19	07/18/2019	Fee	L310 Written Discovery	Jones, Jackie	140	0 1	0 98	0 98	13.02
	Activity: A104 Review/analyze Description: Written Discovery Review/Analyze withdrawal of Cities 2nd RFI and update procedural calendar to reflect same Adjustment: 08/14/2019 - Amount adjusted by 0 98 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 7% discount to vendor fees per billing discount agreement								
20	07/24/2019	Fee	L160 Settlement/Non-Binding ADR	Pearsall, Patrick	335	0 2	4 69	4 69	62 31
	Activity: A108 Communicate (other external) Description: Settlement/Non-binding ADR Communicate with other external Staff counsel H Armstrong re status of settlement discussions with Cities Adjustment: 08/14/2019 - Amount adjusted by 4 69 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 7% discount to vendor fees per billing discount agreement								
21	07/25/2019	Fee	L160 Settlement/Non-Binding ADR	Pearsall, Patrick	335	0 8	18 76	18 76	249 24
	Activity: A106 Communicate (with client) Description: Settlement/Non-binding ADR Communicate with client S Zahala and litigation team re Cities' recommendation to use forecasted billing determinants and potential counteroffer Adjustment: 08/14/2019 - Amount adjusted by 18 76 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 7% discount to vendor fees per billing discount agreement								
22	07/26/2019	Fee	L160 Settlement/Non-Binding ADR	Pearsall, Patrick	335	0 7	16 42	16 42	218 08
	Activity: A108 Communicate (other external) Description: Settlement/Non-binding ADR Communicate with other external Cities' counsel J Mauldin re settlement scope and terms Adjustment: 08/14/2019 - Amount adjusted by 16 42 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 7% discount to vendor fees per billing discount agreement								
23	07/26/2019	Fee	L160 Settlement/Non-Binding ADR	Pearsall, Patrick	335	0 6	14 07	14 07	186 93
	Activity: A106 Communicate (with client) Description: Settlement/Non-binding ADR Communicate with client litigation team re settlement strategy and scope of counteroffers to Cities Adjustment: 08/14/2019 - Amount adjusted by 14 07 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 7% discount to vendor fees per billing discount agreement								
24	07/29/2019	Fee	L120 Analysis/Strategy	Green, Stephanie	230	0 3	4 83	4 83	64 17
	Activity: A104 Review/analyze Description: Analysis/Strategy Review/Analyze status of case and draft motion to suspend Adjustment: 08/14/2019 - Amount adjusted by 4 83 - system, system Reason for Adjustment: Discount Agreement								

Comments to Requestor: 7% discount to vendor fees per billing discount agreement									
25	07/29/2019	Fee	L160 Settlement/Non-Binding ADR	Pearsall, Patrick	335	0 3	7 04	7.04	93 46
Activity: A108 Communicate (other external) Description: Settlement/Non-binding ADR Communicate with other external Staff counsel H Armstrong re status of settlement negotiations with Cities and plan for case suspension Adjustment: 08/14/2019 - Amount adjusted by 7 04 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 7% discount to vendor fees per billing discount agreement									
26	07/29/2019	Fee	L160 Settlement/Non-Binding ADR	Pearsall, Patrick	335	0 3	7 04	7 04	93 46
Activity: A108 Communicate (other external) Description: Settlement/Non-binding ADR Communicate with other external J. Mauldin re suspension of procedural schedule Adjustment: 08/14/2019 - Amount adjusted by 7 04 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 7% discount to vendor fees per billing discount agreement									
27	07/29/2019	Fee	L160 Settlement/Non-Binding ADR	Pearsall, Patrick	335	0 2	4 69	4 69	62 31
Activity: A108 Communicate (other external) Description: Settlement/Non-binding ADR Communicate with other external Staff counsel J Tan and TIEC counsel J Zhu re proposed revisions to settlement documents Adjustment: 08/14/2019 - Amount adjusted by 4 69 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 7% discount to vendor fees per billing discount agreement									
28	07/30/2019	Fee	L120 Analysis/Strategy	Pearsall, Patrick	335	0 2	4 69	4 69	62 31
Activity: A106 Communicate (with client) Description: Analysis/Strategy Communicate with client litigation team re motion to suspend procedural schedule. Adjustment: 08/14/2019 - Amount adjusted by 4 69 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 7% discount to vendor fees per billing discount agreement									
29	07/31/2019	Fee	L160 Settlement/Non-Binding ADR	Green, Stephanie	230	0 8	12 88	12 88	171 12
Activity: A104 Review/analyze Description: Settlement/Non-binding ADR Review/Analyze and prepare settlement documents updating revised rule citations Adjustment: 08/14/2019 - Amount adjusted by 12 88 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 7% discount to vendor fees per billing discount agreement									
30	07/30/2019	Expense	E107 Delivery services/messengers		10	1	0	0	10
Activity: Description: Delivery Services/Messengers Delivery Service from Public Utility Commission of TX									
31	07/30/2019	Expense	E107 Delivery services/messengers		10	1	0	0	10
Activity: Description: Delivery Services/Messengers Delivery Service to Public Utility Commission of TX									

Completed Requests

Item	Request Name	Requestor	Request Date	Completion Date	Comment	Outcome
1	Post Invoice for 3,467 04 USD	Duggins Wren Mann & Romero, LLP	08/14/2019	08/19/2019		Approved
	Approval History					
	Stop	Performer	Activity	Date/Time	Internal Comment	
	1	Ryan, Rhonda C	Approved	08/19/2019 10 49 AM		



Invoice

Customer Number
1068
Invoice Number
109010
Invoice Date
8/3/2019
Invoice Period
7/28/2019-8/3/2019
Invoice Amount
\$108.00

Date Ready Order Type Deliver Date	Order ID Caller	Origin	Destination	References
7/30/2019 1:29 PM ASAP Bike	870706	Duggins Wren Mann & Romero 600 Congress Ave Ste 1900 Austin TX 78701-3348	Public Utility Commission of Tex. 1701 N Congress Ave Austin TX 78701-1494	pjp 12758-467
7/30/2019 2:14 PM	Tammy Mitchell (512) 744-9300		ASAP Bike	\$10.00 481172
POD: Fsc			Order Total:	\$10.00
7/30/2019 2:14 PM ASAP Bike	870706 01	Public Utility Commission of Texas 1701 N Congress Ave Austin TX 78701-1494	Duggins Wren Mann & Romero 600 Congress Ave Ste 1900 Austin TX 78701-3348	pjp 12758-467
7/30/2019 2:31 PM	Tammy Mitchell (512) 744-9300		ASAP Bike	\$10.00 481173
POD: Talem			Order Total:	\$10.00

Header Information

Invoice Number: 32163
Vendor: Duggins Wren Mann & Romero, LLP
Address: 600 Congress Ave Suite 1900, Austin, TX, 78701, United States of America
Tax ID: 27-5110427
Invoice Date: 09/12/2019
Received Date: 09/12/2019
Project: AEPD056092-AEP Texas EECRF
Posting Status: Posted

Billing Start Date: 07/15/2019
Billing End Date: 08/31/2019

Submitted Total: \$5,093.4
Submitted Currency: USD
Tax Rate: 0%
PS Voucher: 02453683
Approved Total: \$4,739.24

Invoice Summary

Type	Rate x Units	Discount	AEP Disc	Adjustment	AEP Split	Tax	Amount
Fees	5,059.5	0	354.16	0	0	0	4,705.34
Expenses	33.9	0	N/A	0	0	0	33.9
Invoice Total	5,093.4	0	354.16	0	0	0	4,739.24

Line Items

Item	Date	Type	Category	TK	Rate	Units	Disc	Adj	Amt
1	08/01/2019	Fee	L210 Pleadings	Jones, Jackie	140	0.1	0.98	0.98	13.02
	Activity: A104 Review/analyze								
	Description: Pleadings Review/Analyze SOAH Order No. 4 suspending procedural schedule								
	Adjustment: 09/12/2019 - Amount adjusted by 0.98 - system, system								
	Reason for Adjustment: Discount Agreement								
2	08/02/2019	Fee	L160 Settlement/Non-Binding ADR	Green, Stephanie	230	0.2	3.22	3.22	42.78
	Activity: A104 Review/analyze								
	Description: Settlement/Non-binding ADR Review/Analyze correspondence re terms and structure of settlement in anticipation of preparing settlement documents								
	Adjustment: 09/12/2019 - Amount adjusted by 3.22 - system, system								
	Reason for Adjustment: Discount Agreement								
3	08/07/2019	Fee	L160 Settlement/Non-Binding ADR	Pearsall, Patnck	335	0.4	9.38	9.38	124.62
	Activity: A104 Review/analyze								
	Description: Settlement/Non-binding ADR Review/Analyze issues re strategy for stipulation and proposed order								
	Adjustment: 09/12/2019 - Amount adjusted by 9.38 - system, system								
	Reason for Adjustment: Discount Agreement								
4	08/12/2019	Fee	L160 Settlement/Non-Binding ADR	Green, Stephanie	230	0.4	6.44	6.44	85.56
	Activity: A104 Review/analyze								
	Description: Settlement/Non-binding ADR Review/Analyze information for AEP EECRF settlement documents preparation								
	Adjustment: 09/12/2019 - Amount adjusted by 6.44 - system, system								
	Reason for Adjustment: Discount Agreement								
5	08/13/2019	Fee	L460 Post-Trial Motions and Submissions	Green, Stephanie	230	0.3	4.83	4.83	64.17
	Activity: A104 Review/analyze								
	Description: Post-Trial Motions and Submissions Review/Analyze issues re necessary findings of fact in proposed order								
	Adjustment: 09/12/2019 - Amount adjusted by 4.83 - system, system								
	Reason for Adjustment: Discount Agreement								
6	08/13/2019	Fee	L160 Settlement/Non-Binding ADR	Green, Stephanie	230	2.8	45.08	45.08	598.92
	Activity: A104 Review/analyze								
	Description: Settlement/Non-binding ADR Review/Analyze and prepare settlement documents								
	Adjustment: 09/12/2019 - Amount adjusted by 45.08 - system, system								
	Reason for Adjustment: Discount Agreement								
7	08/14/2019	Fee	L460 Post-Trial Motions	Green,	230	4.8	77.28	77.28	1,026.72

			and Submissions	Stephanie					
	Activity: A103 Draft/revise Description: Post-Trial Motions and Submissions Draft/Revise proposed order for EECRF Adjustment: 09/12/2019 - Amount adjusted by 77 28 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 7% discount to vendor fees per billing discount agreement								
8	08/15/2019	Fee	L160 Settlement/Non-Binding ADR	Green, Stephanie	230	2 2	35 42	35 42	470 58
	Activity: A104 Review/analyze Description: Settlement/Non-binding ADR Review/Analyze first drafts with comments and questions re settlement documents Adjustment: 09/12/2019 - Amount adjusted by 35 42 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 7% discount to vendor fees per billing discount agreement								
9	08/15/2019	Fee	L160 Settlement/Non-Binding ADR	Green, Stephanie	230	0 4	6 44	6 44	85 56
	Activity: A103 Draft/revise Description: Settlement/Non-binding ADR Draft/Revise settlement documents Adjustment: 09/12/2019 - Amount adjusted by 6 44 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 7% discount to vendor fees per billing discount agreement								
10	08/15/2019	Fee	L210 Pleadings	Pearsall, Patrick	335	0 7	16 42	16 42	218 08
	Activity: A104 Review/analyze Description: Pleadings Review/Analyze issues re stipulation, proposed order, and motion to admit and remand evidence Adjustment: 09/12/2019 - Amount adjusted by 16 42 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 7% discount to vendor fees per billing discount agreement								
11	08/16/2019	Fee	L210 Pleadings	Pearsall, Patrick	335	0 4	9 38	9 38	124 62
	Activity: A103 Draft/revise Description: Pleadings Draft/Revise settlement documents Adjustment: 09/12/2019 - Amount adjusted by 9 38 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 7% discount to vendor fees per billing discount agreement								
12	08/19/2019	Fee	L160 Settlement/Non-Binding ADR	Pearsall, Patrick	335	0 2	4 69	4 69	62 31
	Activity: A106 Communicate (with client) Description: Settlement/Non-binding ADR Communicate with client M Gage re settlement documents. Adjustment: 09/12/2019 - Amount adjusted by 4 69 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 7% discount to vendor fees per billing discount agreement								
13	08/21/2019	Fee	L210 Pleadings	Pearsall, Patrick	335	0 3	7 04	7 04	93 46
	Activity: A104 Review/analyze Description: Pleadings Review/Analyze revisions to settlement documents Adjustment: 09/12/2019 - Amount adjusted by 7 04 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 7% discount to vendor fees per billing discount agreement								
14	08/21/2019	Fee	L160 Settlement/Non-Binding ADR	Green, Stephanie	230	0 4	6 44	6 44	85 56
	Activity: A104 Review/analyze Description: Settlement/Non-binding ADR Review/Analyze status of EECRF settlement documents and review for filing. Adjustment: 09/12/2019 - Amount adjusted by 6 44 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 7% discount to vendor fees per billing discount agreement								
15	08/26/2019	Fee	L160 Settlement/Non-Binding ADR	Green, Stephanie	230	0 8	12 88	12 88	171 12
	Activity: A106 Communicate (with client) Description: Settlement/Non-binding ADR Communicate with client via conference call re revisions to and finalizing settlement documents Adjustment: 09/12/2019 - Amount adjusted by 12 88 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 7% discount to vendor fees per billing discount agreement								
16	08/26/2019	Fee	L160 Settlement/Non-Binding ADR	Green, Stephanie	230	1 8	28 98	28 98	385 02
	Activity: A103 Draft/revise Description: Settlement/Non-binding ADR Draft/Revise settlement documents								

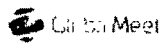
	Adjustment: 09/12/2019 - Amount adjusted by 28 98 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 7% discount to vendor fees per billing discount agreement								
17	08/26/2019	Fee	L160 Settlement/Non-Binding ADR	Pearsall, Patrick	335	0 8	18 76	18 76	249 24
	Activity: A106 Communicate (with client) Description: Settlement/Non-binding ADR Communicate with client litigation team re revisions to and finalizing settlement documents Adjustment: 09/12/2019 - Amount adjusted by 18 76 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 7% discount to vendor fees per billing discount agreement								
18	08/26/2019	Fee	L160 Settlement/Non-Binding ADR	Pearsall, Patrick	335	0 6	14 07	14 07	186 93
	Activity: A104 Review/analyze Description: Settlement/Non-binding ADR Review/Analyze litigation team's proposed revisions to and revise settlement documents Adjustment: 09/12/2019 - Amount adjusted by 14 07 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 7% discount to vendor fees per billing discount agreement								
19	08/27/2019	Fee	L120 Analysis/Strategy	Green, Stephanie	230	0 3	4 83	4 83	64 17
	Activity: A104 Review/analyze Description: Analysis/Strategy Review/Analyze updated documents to confirm changes. Adjustment: 09/12/2019 - Amount adjusted by 4 83 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 7% discount to vendor fees per billing discount agreement								
20	08/27/2019	Fee	L160 Settlement/Non-Binding ADR	Pearsall, Patrick	335	0 3	7 04	7 04	93 46
	Activity: A104 Review/analyze Description: Settlement/Non-binding ADR Review/Analyze final revisions to stipulation and proposed order Adjustment: 09/12/2019 - Amount adjusted by 7 04 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 7% discount to vendor fees per billing discount agreement								
21	08/28/2019	Fee	L120 Analysis/Strategy	Green, Stephanie	230	0 2	3 22	3 22	42 78
	Activity: A104 Review/analyze Description: Analysis/Strategy Review/Analyze and confirm information provided and revisions to tanffs with J. Jackson Adjustment: 09/12/2019 - Amount adjusted by 3 22 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 7% discount to vendor fees per billing discount agreement								
22	08/28/2019	Fee	L160 Settlement/Non-Binding ADR	Pearsall, Patrick	335	0 2	4 69	4 69	62 31
	Activity: A108 Communicate (other external) Description: Settlement/Non-binding ADR Communicate with other external Staff and intervenor counsel re settlement documents. Adjustment: 09/12/2019 - Amount adjusted by 4 69 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 7% discount to vendor fees per billing discount agreement								
23	08/28/2019	Fee	L160 Settlement/Non-Binding ADR	Pearsall, Patrick	335	0 1	2 34	2 34	31 16
	Activity: A106 Communicate (with client) Description: Settlement/Non-binding ADR Communicate with client litigation team re finalizing stipulation and distribution of settlement documents to Staff and intervenors Adjustment: 09/12/2019 - Amount adjusted by 2 34 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 7% discount to vendor fees per billing discount agreement								
24	08/29/2019	Fee	L210 Pleadings	Green, Stephanie	230	0 2	3 22	3 22	42 78
	Activity: A104 Review/analyze Description: Pleadings Review/Analyze agreed joint status report. Adjustment: 09/12/2019 - Amount adjusted by 3 22 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 7% discount to vendor fees per billing discount agreement								
25	08/29/2019	Fee	L160 Settlement/Non-Binding ADR	Pearsall, Patrick	335	0 2	4 69	4 69	62 31
	Activity: A108 Communicate (other external) Description: Settlement/Non-binding ADR Communicate with other external Staff counsel H. Armstrong re class cost allocation issues associated with settlement Adjustment: 09/12/2019 - Amount adjusted by 4 69 - system, system								

Reason for Adjustment: Discount Agreement Comments to Requestor: 7% discount to vendor fees per billing discount agreement									
26	08/29/2019	Fee	L160 Settlement/Non-Binding ADR	Pearsall, Patrick	335	0.1	2.34	2.34	31.16
	Activity: A106 Communicate (with client) Description: Settlement/Non-binding ADR Communicate with client J Jackson re Staff questions re class cost allocation Adjustment: 09/12/2019 - Amount adjusted by 2.34 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 7% discount to vendor fees per billing discount agreement								
	08/29/2019	Fee	L210 Pleadings	Pearsall, Patrick	335	0.2	4.69	4.69	62.31
	Activity: A103 Draft/revise Description: Pleadings Draft/Revise joint status update re settlement negotiations Adjustment: 09/12/2019 - Amount adjusted by 4.69 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 7% discount to vendor fees per billing discount agreement								
28	08/29/2019	Fee	L210 Pleadings	Pearsall, Patrick	335	0.1	2.34	2.34	31.16
	Activity: A108 Communicate (other external) Description: Pleadings Communicate with other external Staff and intervenor counsel re joint status update Adjustment: 09/12/2019 - Amount adjusted by 2.34 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 7% discount to vendor fees per billing discount agreement								
	08/30/2019	Fee	L160 Settlement/Non-Binding ADR	Pearsall, Patrick	335	0.2	4.69	4.69	62.31
	Activity: A108 Communicate (other external) Description: Settlement/Non-binding ADR Communicate with other external H Armstrong re Staff's review of settlement documents. Adjustment: 09/12/2019 - Amount adjusted by 4.69 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 7% discount to vendor fees per billing discount agreement								
30	08/30/2019	Fee	L160 Settlement/Non-Binding ADR	Pearsall, Patrick	335	0.1	2.34	2.34	31.16
	Activity: A103 Draft/revise Description: Settlement/Non-binding ADR Draft/Revise and finalize joint status report on settlement discussions Adjustment: 09/12/2019 - Amount adjusted by 2.34 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 7% discount to vendor fees per billing discount agreement								
	07/15/2019	Expense	E105 Telephone		18.9	1	0	0	18.9
	Activity: Description: Telephone (Long Distance) Conference Calls								
32	08/30/2019	Expense	E107 Delivery services/messengers		8	1	0	0	8
	Activity: Description: Delivery Services/Messengers Delivery Service to Public Utility Commission of TX/ status report								
33	08/30/2019	Expense	E107 Delivery services/messengers		7	1	0	0	7
	Activity: Description: Delivery Services/Messengers Delivery Service from Public Utility Commission of TX / status report.								

Completed Requests

Item	Request Name	Requestor	Request Date	Completion Date	Comment	Outcome
1	Post Invoice for 4,739.24 USD	Duggins Wren Mann & Romero, LLP	09/12/2019	09/16/2019		Approved
	Approval History					
	Stop	Performer	Activity	Date/Time	Internal Comment	
	1	Ryan, Rhonda C	Approved	09/16/2019 11:50 AM		

Uuu7

 PG1
2300 Lakeview Parkway, Suite 225/300
Alpharetta, GA 30009

Accounts Payable
Duggins Wren Mann & Romero, LLP
600 Congress Avenue
Suite 1900
Austin, TX 78701

Invoice Number: 5127449300-081219
Invoice Date: 08/12/2019
Tax ID: 58-2421656
Terms: Payment Due Upon Receipt
Billing Period: Period Ending 08/12/2019

MODERATOR		EMPLOYEE CODE	
Patrick Pearsall		990005	
Date: 07/15/19	Client Matter: 012758-000467	Service: Readyconference Plus Audio	
Time: 10:54 AM	Description	Participants	Unit Price
	GlobalMeet * Audio NA - Toll Free	10	0.047
	Call Total: 18.90	Minutes/Qty	Item Charge
		268	12.60
		Sub Total Pre-Tax: 12.60	Taxes and Surcharges: 6.30

**COURIER
DEPOT**
P.O. Box 93097
Austin, TX 78709-3097
(512) 892-1876

Invoice

Customer Number
1068
Invoice Number
109337
Invoice Date
8/31/2019
Invoice Period
8/25/2019-8/31/2019
Invoice Amount
\$155.41

Date Ready Order Type Deliver Date	Order ID Caller	Origin	Destination	References
8/30/2019 10:00 AM 2 Hour Bike	872892.01	Public Utility Commission of Texas 1701 Congress Ave	Duggins Wren Mann & Romero 600 Congress Ave	12758-467/PJP status report
8/30/2019 9:59 AM	Michele Barker (512) 744-9300	Austin TX 78701-1402	Austin TX 78701-3348	
		2 Hour Bike	\$7.00	484678
POD: Michelle T		Order Total:	\$7.00	
8/30/2019 9:00 AM 1 Hour Bike	872892	Duggins Wren Mann & Romero 600 Congress Ave	Public Utility Commission of Tex. 1701 Congress Ave	12758-467/PJP status report
8/30/2019 9:40 AM	Michele Barker (512) 744-9300	Austin TX 78701-3348	Austin TX 78701-1402	
		1 Hour Bike	\$8.00	484672
POD: PUC		Order Total:	\$8.00	

Header Information

Invoice Number: 32447
Vendor: Duggins Wren Mann & Romero, LLP
Address: 600 Congress Ave Suite 1900, Austin, TX, 78701, United States of America
Tax ID: 27-5110427
Invoice Date: 10/11/2019
Received Date: 10/11/2019
Project: AEPD056092-AEP Texas EECRF
Posting Status: Posted

Billing Start Date: 09/03/2019
Billing End Date: 09/30/2019

Submitted Total: \$3,206.96
Submitted Currency: USD
Tax Rate: 0%
PS Voucher: 02461518
Approved Total: \$2,986.8

Invoice Summary

Type	Rate x Units	Discount	AEP Disc	Adjustment	AEP Split	Tax	Amount
Fees	3,145	0	220.16	0	0	0	2,924.84
Expenses	61.96	0	N/A	0	0	0	61.96
Invoice Total	3,206.96	0	220.16	0	0	0	2,986.8

Line Items

Item	Date	Type	Category	TK	Rate	Units	Disc	Adj	Amt
1	09/03/2019	Fee	L160 Settlement/Non-Binding ADR	Pearsall, Patrick	335	0.2	4.69	4.69	62.31
	Activity: A106 Communicate (with client)								
	Description: Settlement/Non-binding ADR Communicate with client J. Jackson re settlement class allocation issue								
	Adjustment: 10/11/2019 - Amount adjusted by 4.69 - system, system								
	Reason for Adjustment: Discount Agreement								
2	09/04/2019	Fee	L160 Settlement/Non-Binding ADR	Pearsall, Patrick	335	0.3	7.04	7.04	93.46
	Activity: A108 Communicate (other external)								
	Description: Settlement/Non-binding ADR Communicate with other external Staff counsel H. Armstrong re revisions to stipulation and proposed order								
	Adjustment: 10/11/2019 - Amount adjusted by 7.04 - system, system								
	Reason for Adjustment: Discount Agreement								
3	09/05/2019	Fee	L120 Analysis/Strategy	Green, Stephanie	230	0.3	4.83	4.83	64.17
	Activity: A106 Communicate (with client)								
	Description: Analysis/Strategy Communicate with client M. Gage et al re EECRF files requested by Staff								
	Adjustment: 10/11/2019 - Amount adjusted by 4.83 - system, system								
	Reason for Adjustment: Discount Agreement								
4	09/05/2019	Fee	L160 Settlement/Non-Binding ADR	Pearsall, Patrick	335	0.2	4.69	4.69	62.31
	Activity: A108 Communicate (other external)								
	Description: Settlement/Non-binding ADR Communicate with other external Staff counsel H. Armstrong re settlement documents								
	Adjustment: 10/11/2019 - Amount adjusted by 4.69 - system, system								
	Reason for Adjustment: Discount Agreement								
5	09/08/2019	Fee	L160 Settlement/Non-Binding ADR	Pearsall, Patrick	335	0.4	9.38	9.38	124.62
	Activity: A104 Review/analyze								
	Description: Settlement/Non-binding ADR Review/Analyze issues re revisions to proposed order to address details of stipulation								
	Adjustment: 10/11/2019 - Amount adjusted by 9.38 - system, system								
	Reason for Adjustment: Discount Agreement								
6	09/09/2019	Fee	L160 Settlement/Non-Binding ADR	Pearsall, Patrick	335	0.2	4.69	4.69	62.31
	Activity: A106 Communicate (with client)								
	Description: Settlement/Non-binding ADR Communicate with client M. Gage re issues with settlement documents								
	Adjustment: 10/11/2019 - Amount adjusted by 4.69 - system, system								
	Reason for Adjustment: Discount Agreement								
7	09/09/2019	Fee	L160 Settlement/Non-Binding ADR	Pearsall, Patrick	335	0.3	7.04	7.04	93.46

			Binding ADR	Patrick					
	Activity: A104 Review/analyze Description: Settlement/Non-binding ADR Review/Analyze issues re Staff concerns with scope of stipulation. Adjustment: 10/11/2019 - Amount adjusted by 7 04 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 7% discount to vendor fees per billing discount agreement								
8	09/10/2019	Fee	L120 Analysis/Strategy	Pearsall, Patrick	335	0 3	7 04	7 04	93 46
	Activity: A104 Review/analyze Description: Analysis/Strategy Review/Analyze issues re scope of and method for notice Adjustment: 10/11/2019 - Amount adjusted by 7.04 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 7% discount to vendor fees per billing discount agreement								
9	09/10/2019	Fee	L160 Settlement/Non-Binding ADR	Pearsall, Patrick	335	0 2	4 69	4 69	62 31
	Activity: A103 Draft/revise Description: Settlement/Non-binding ADR Draft/Revise stipulation and proposed order re Staff concerns Adjustment: 10/11/2019 - Amount adjusted by 4 69 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 7% discount to vendor fees per billing discount agreement								
10	09/10/2019	Fee	L160 Settlement/Non-Binding ADR	Pearsall, Patrick	335	0 2	4 69	4 69	62 31
	Activity: A108 Communicate (other external) Description: Settlement/Non-binding ADR Communicate with other external Staff counsel H Armstrong re revisions to stipulation and proposed order Adjustment: 10/11/2019 - Amount adjusted by 4 69 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 7% discount to vendor fees per billing discount agreement								
11	09/13/2019	Fee	L160 Settlement/Non-Binding ADR	Pearsall, Patrick	335	0 1	2 34	2 34	31 16
	Activity: A108 Communicate (other external) Description: Settlement/Non-binding ADR Communicate with other external Staff counsel H Armstrong re finalizing proposed order Adjustment: 10/11/2019 - Amount adjusted by 2 34 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 7% discount to vendor fees per billing discount agreement								
12	09/16/2019	Fee	L160 Settlement/Non-Binding ADR	Pearsall, Patrick	335	0 2	4.69	4 69	62.31
	Activity: A108 Communicate (other external) Description: Settlement/Non-binding ADR Communicate with other external H Armstrong re status of Staff review of settlement documents Adjustment: 10/11/2019 - Amount adjusted by 4 69 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 7% discount to vendor fees per billing discount agreement								
13	09/17/2019	Fee	L160 Settlement/Non-Binding ADR	Pearsall, Patrick	335	0 2	4 69	4 69	62 31
	Activity: A104 Review/analyze Description: Settlement/Non-binding ADR Review/Analyze Staff proposed edits to stipulation and analyze issues re finalizing settlement documents for filing . Adjustment: 10/11/2019 - Amount adjusted by 4 69 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 7% discount to vendor fees per billing discount agreement								
14	09/18/2019	Fee	L250 Other Written Motions/Submissions	Green, Stephanie	230	3 2	51 52	51 52	684 48
	Activity: A103 Draft/revise Description: Other Written Motions and Submissions Draft/Revise proposed order per Staff request to conform to recent approved orders Adjustment: 10/11/2019 - Amount adjusted by 51 52 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 7% discount to vendor fees per billing discount agreement								
15	09/18/2019	Fee	L250 Other Written Motions/Submissions	Green, Stephanie	230	0 2	3 22	3 22	42 78
	Activity: A104 Review/analyze Description: Other Written Motions and Submissions Review/Analyze and respond to comments re proposed order and revisions Adjustment: 10/11/2019 - Amount adjusted by 3 22 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 7% discount to vendor fees per billing discount agreement								
16	09/18/2019	Fee	L160 Settlement/Non-	Pearsall,	335	0 6	14 07	14 07	186 93

			Binding ADR	Patrick					
	Activity: A108 Communicate (other external) Description: Settlement/Non-binding ADR Communicate with other external Staff counsel H. Armstrong re Staff review and edits to settlement documents Adjustment: 10/11/2019 - Amount adjusted by 14.07 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 7% discount to vendor fees per billing discount agreement								
17	09/18/2019	Fee	L160 Settlement/Non-Binding ADR	Pearsall, Patrick	335	0.8	18.76	18.76	249.24
	Activity: A104 Review/analyze Description: Settlement/Non-binding ADR Review/Analyze Staff revisions to stipulation and revise settlement documents for filing Adjustment: 10/11/2019 - Amount adjusted by 18.76 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 7% discount to vendor fees per billing discount agreement								
18	09/18/2019	Fee	L160 Settlement/Non-Binding ADR	Pearsall, Patrick	335	0.2	4.69	4.69	62.31
	Activity: A106 Communicate (with client) Description: Settlement/Non-binding ADR Communicate with client M. Gage and litigation team re finalizing settlement documents Adjustment: 10/11/2019 - Amount adjusted by 4.69 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 7% discount to vendor fees per billing discount agreement								
19	09/19/2019	Fee	L160 Settlement/Non-Binding ADR	Green, Stephanie	230	1.8	28.98	28.98	385.02
	Activity: A103 Draft/revise Description: Settlement/Non-binding ADR Draft/Revise settlement documents for circulation among parties Adjustment: 10/11/2019 - Amount adjusted by 28.98 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 7% discount to vendor fees per billing discount agreement								
20	09/19/2019	Fee	L160 Settlement/Non-Binding ADR	Pearsall, Patrick	335	0.3	7.04	7.04	93.46
	Activity: A106 Communicate (with client) Description: Settlement/Non-binding ADR Communicate with client R. Cavazos and M. Gage re revisions to stipulation and proposed order. Adjustment: 10/11/2019 - Amount adjusted by 7.04 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 7% discount to vendor fees per billing discount agreement								
21	09/20/2019	Fee	L160 Settlement/Non-Binding ADR	Pearsall, Patrick	335	0.5	11.72	11.72	155.78
	Activity: A104 Review/analyze Description: Settlement/Non-binding ADR Review/Analyze and finalize settlement documents for filing Adjustment: 10/11/2019 - Amount adjusted by 11.72 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 7% discount to vendor fees per billing discount agreement								
22	09/30/2019	Fee	L250 Other Written Motions/Submissions	Green, Stephanie	230	0.6	9.66	9.66	128.34
	Activity: A104 Review/analyze Description: Other Written Motions and Submissions Review/Analyze recent proposed orders, Chairman Walker memo on issue in parallel EECRF proceeding, and existence of record support issue in filing package. Adjustment: 10/11/2019 - Amount adjusted by 9.66 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 7% discount to vendor fees per billing discount agreement								
23	09/20/2019	Expense	E107 Delivery services/messengers		12	1	0	0	12
	Activity: Description: Delivery Services/Messengers Delivery Service to Public Utility Commission of TX								
24	09/20/2019	Expense	E107 Delivery services/messengers		12	1	0	0	12
	Activity: Description: Delivery Services/Messengers Delivery Service from Public Utility Commission of TX.								
25	09/20/2019	Expense	E101 Copying		0.04	949	0	0	37.96
	Activity: Description: Photocopies Photocopies - B&W - settlement docs.								

Completed Requests

Item	Request Name	Requestor	Request Date	Completion Date	Comment	Outcome
1	Post Invoice for	Duggins Wren Mann &	10/11/2019	10/14/2019		Approved

	2,986 80 USD		Romero, LLP					
	Approval History							
	Stop	Performer	Activity	Date/Time		Internal Comment		
1	Ryan, Rhonda C	Approved	10/14/2019 11 18 AM					



Invoice

Customer Number
1068
Invoice Number
109581
Invoice Date
9/21/2019
Invoice Period
9/15/2019-9/21/2019

Date Ready Order Type Deliver Date	Order ID Caller	Origin	Destination	References
9/20/2019 1:25 PM Rush Bike	874318	Duggins Wren Mann & Romero 600 Congress Ave Ste 1900 Austin TX 78701-3348	Public Utility Commission of Tex. 1701 N Congress Ave Austin TX 78701-1494	PJP 12758-467
9/20/2019 2:17 PM	Tammy Mitchell (512) 744-9300			
POD: Fsc			Rush Bike \$12.00	487211
			Order Total: \$12.00	
9/20/2019 1:55 PM Rush Bike	874318.01	Public Utility Commission of Texas 1701 N Congress Ave Austin TX 78701-1494	Duggins Wren Mann & Romero 600 Congress Ave Ste 1900 Austin TX 78701-3348	PJP 12758-467
9/20/2019 2:16 PM	Tammy Mitchell (512) 744-9300			
POD: Penner			Rush Bike \$12.00	487212
			Order Total: \$12.00	

Header Information

Invoice Number: 32702
Vendor: Duggins Wren Mann & Romero, LLP
Address: 600 Congress Ave Suite 1900, Austin, TX, 78701, United States of America
Tax ID: 27-5110427
Invoice Date: 11/12/2019
Received Date: 11/12/2019
Project: AEPD056092-AEP Texas EECRF
Posting Status: Posted

Billing Start Date: 10/01/2019
Billing End Date: 10/31/2019

Submitted Total: \$1,946 5
Submitted Currency: USD
Tax Rate: 0%
PS Voucher: 02471709
Approved Total: \$1,810 24

Invoice Summary

Type	Rate x Units	Discount	AEP Disc	Adjustment	AEP Split	Tax	Amount
Fees	1,946 5	0	136 26	0	0	0	1,810 24
Expenses	0	0	N/A	0	0	0	0
Invoice Total	1,946 5	0	136 26	0	0	0	1,810 24

Line Items

Item	Date	Type	Category	TK	Rate	Units	Disc	Adj	Amt
1	10/01/2019	Fee	L120 Analysis/Strategy	Pearsall, Patrick	335	0 2	4 69	4.69	62 31
	Activity: A104 Review/analyze Description: Analysis/Strategy Review/Analyze issues re potential revisions to proposed order in response to Chairman Walker memo in Oncor EECRF docket. Adjustment: 11/12/2019 - Amount adjusted by 4 69 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 7% discount to vendor fees per billing discount agreement								
	10/01/2019	Fee	L120 Analysis/Strategy	Pearsall, Patrick	335	0 1	2 34	2 34	31 16
	Activity: A104 Review/analyze Description: Analysis/Strategy Review/Analyze SOAH Order No 5 admitting evidence and remanding docket to Commission Adjustment: 11/12/2019 - Amount adjusted by 2 34 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 7% discount to vendor fees per billing discount agreement								
3	10/01/2019	Fee	L430 Written Motions/Submissions	Green, Stephanie	230	0 3	4 83	4.83	64 17
	Activity: A106 Communicate (with client) Description: Written Motions and Submissions Communicate with client M Gage re support in record for proposed order issue Adjustment: 11/12/2019 - Amount adjusted by 4 83 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 7% discount to vendor fees per billing discount agreement								
	10/11/2019	Fee	L120 Analysis/Strategy	Pearsall, Patrick	335	0 2	4 69	4 69	62 31
	Activity: A106 Communicate (with client) Description: Analysis/Strategy Communicate with client M Gage re need to supplement record in response to Chairman Walker issued in CenterPoint EECRF docket Adjustment: 11/12/2019 - Amount adjusted by 4 69 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 7% discount to vendor fees per billing discount agreement								
5	10/14/2019	Fee	L120 Analysis/Strategy	Pearsall, Patrick	335	0 2	4 69	4 69	62 31
	Activity: A104 Review/analyze Description: Analysis/Strategy Review/Analyze issue re evidence in record supporting calculation of loss of load due to certain industrial taking electric service at distribution voltage Adjustment: 11/12/2019 - Amount adjusted by 4 69 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 7% discount to vendor fees per billing discount agreement								
	10/14/2019	Fee	L120 Analysis/Strategy	Green, Stephanie	230	0 8	12 88	12 88	171 12
	Activity: A104 Review/analyze Description: Analysis/Strategy Review/Analyze record support for order in light of chairman memo re CenterPoint EECRF issue Adjustment: 11/12/2019 - Amount adjusted by 12 88 - system, system Reason for Adjustment: Discount Agreement								

Comments to Requestor: 7% discount to vendor fees per billing discount agreement									
7	10/14/2019	Fee	L120 Analysis/Strategy	Green, Stephanie	230	0 1	1.61	1 61	21 39
Activity: A106 Communicate (with client) Description: Analysis/Strategy Communicate with client M Gage re record support for order in light of chairman memo re CenterPoint EECRF issue Adjustment: 11/12/2019 - Amount adjusted by 1 61 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 7% discount to vendor fees per billing discount agreement									
8	10/17/2019	Fee	L120 Analysis/Strategy	Pearsall, Patrick	335	0 4	9 38	9 38	124 62
Activity: A106 Communicate (with client) Description: Analysis/Strategy Communicate with client M Gage re supplementing record in response to recent memoranda from Chairman Walker Adjustment: 11/12/2019 - Amount adjusted by 9 38 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 7% discount to vendor fees per billing discount agreement									
9	10/17/2019	Fee	L120 Analysis/Strategy	Pearsall, Patrick	335	0 2	4 69	4 69	62 31
Activity: A104 Review/analyze Description: Analysis/Strategy Review/Analyze issues re supplementing evidentiary record Adjustment: 11/12/2019 - Amount adjusted by 4 69 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 7% discount to vendor fees per billing discount agreement									
10	10/17/2019	Fee	L120 Analysis/Strategy	Green, Stephanie	230	0 1	1 61	1 61	21 39
Activity: A104 Review/analyze Description: Analysis/Strategy Review/Analyze information from M Gage re issue raised by chairman Adjustment: 11/12/2019 - Amount adjusted by 1 61 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 7% discount to vendor fees per billing discount agreement									
11	10/17/2019	Fee	L120 Analysis/Strategy	Green, Stephanie	230	0.2	3 22	3 22	42.78
Activity: A106 Communicate (with client) Description: Analysis/Strategy Communicate with client M Gage re issue raised by chairman Adjustment: 11/12/2019 - Amount adjusted by 3 22 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 7% discount to vendor fees per billing discount agreement									
12	10/18/2019	Fee	L120 Analysis/Strategy	Pearsall, Patrick	335	0 3	7 04	7 04	93 46
Activity: A106 Communicate (with client) Description: Analysis/Strategy Communicate with client M Gage re necessity of supplementing evidentiary record in light of Chairman Walker memo in CenterPoint EECRF docket Adjustment: 11/12/2019 - Amount adjusted by 7 04 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 7% discount to vendor fees per billing discount agreement									
13	10/29/2019	Fee	L120 Analysis/Strategy	Green, Stephanie	230	0 4	6 44	6 44	85 56
Activity: A104 Review/analyze Description: Analysis/Strategy Review/Analyze documents in light of Chairman Walker memo Adjustment: 11/12/2019 - Amount adjusted by 6 44 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 7% discount to vendor fees per billing discount agreement									
14	10/29/2019	Fee	L210 Pleadings	Green, Stephanie	230	0 3	4 83	4 83	64 17
Activity: A103 Draft/revise Description: Pleadings Draft/Revise motion to admit evidence. Adjustment: 11/12/2019 - Amount adjusted by 4.83 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 7% discount to vendor fees per billing discount agreement									
15	10/29/2019	Fee	L120 Analysis/Strategy	Pearsall, Patrick	335	0 2	4 69	4 69	62 31
Activity: A106 Communicate (with client) Description: Analysis/Strategy Communicate with client M. Gage re supplementing evidentiary record to address Chairman concerns Adjustment: 11/12/2019 - Amount adjusted by 4 69 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 7% discount to vendor fees per billing discount agreement									

16	10/29/2019	Fee	L120 Analysis/Strategy	Pearsall, Patrick	335	0 3	7 04	7 04	93 46
	Activity: A104 Review/analyze								
	Description: Analysis/Strategy Review/Analyze issues re supplementing evidentiary record with additional information re calculation of demand reduction goal								
	Adjustment: 11/12/2019 - Amount adjusted by 7 04 - system, system								
	Reason for Adjustment: Discount Agreement Comments to Requestor: 7% discount to vendor fees per billing discount agreement								
17	10/29/2019	Fee	L210 Pleadings	Pearsall, Patrick	335	0 3	7 04	7 04	93 46
	Activity: A103 Draft/revise								
	Description: Pleadings Draft/Revise motion to supplement evidentiary record								
	Adjustment: 11/12/2019 - Amount adjusted by 7 04 - system, system								
	Reason for Adjustment: Discount Agreement Comments to Requestor: 7% discount to vendor fees per billing discount agreement								
18	10/30/2019	Fee	L210 Pleadings	Pearsall, Patrick	335	0 5	11 72	11 72	155 78
	Activity: A103 Draft/revise								
	Description: Pleadings Draft/Revise motion to admit additional evidence								
	Adjustment: 11/12/2019 - Amount adjusted by 11 72 - system, system								
	Reason for Adjustment: Discount Agreement Comments to Requestor: 7% discount to vendor fees per billing discount agreement								
19	10/30/2019	Fee	L120 Analysis/Strategy	Pearsall, Patrick	335	0 2	4 69	4 69	62 31
	Activity: A106 Communicate (with client)								
	Description: Analysis/Strategy Communicate with client M Gage re motion to admit additional evidence								
	Adjustment: 11/12/2019 - Amount adjusted by 4 69 - system, system								
	Reason for Adjustment: Discount Agreement Comments to Requestor: 7% discount to vendor fees per billing discount agreement								
20	10/30/2019	Fee	L120 Analysis/Strategy	Pearsall, Patrick	335	0 2	4 69	4 69	62 31
	Activity: A108 Communicate (other external)								
	Description: Analysis/Strategy Communicate with other external Staff and intervenor counsel re position of AEP Texas motion to admit additional evidence								
	Adjustment: 11/12/2019 - Amount adjusted by 4 69 - system, system								
	Reason for Adjustment: Discount Agreement Comments to Requestor: 7% discount to vendor fees per billing discount agreement								
21	10/31/2019	Fee	L210 Pleadings	Pearsall, Patrick	335	0 4	9 38	9 38	124 62
	Activity: A108 Communicate (other external)								
	Description: Pleadings Communicate with other external Cities' counsel J Mauldin re questions concerning supplemental workpaper and motion to admit additional evidence								
	Adjustment: 11/12/2019 - Amount adjusted by 9 38 - system, system								
	Reason for Adjustment: Discount Agreement Comments to Requestor: 7% discount to vendor fees per billing discount agreement								
22	10/31/2019	Fee	L210 Pleadings	Pearsall, Patrick	335	0 6	14 07	14 07	186 93
	Activity: A106 Communicate (with client)								
	Description: Pleadings Communicate with client P Osterloh re Cities' questions concerning motion to admit additional evidence								
	Adjustment: 11/12/2019 - Amount adjusted by 14 07 - system, system								
	Reason for Adjustment: Discount Agreement Comments to Requestor: 7% discount to vendor fees per billing discount agreement								

Completed Requests

Item	Request Name	Requestor	Request Date	Completion Date	Comment	Outcome
1	Post Invoice for 1,810.24 USD	Duggins Wren Mann & Romero, LLP	11/12/2019	11/24/2019		Approved
	Approval History					
	Stop	Performer	Activity	Date/Time	Internal Comment	
	1	Ryan, Rhonda C	Approved	11/24/2019 02:55 PM		

Header Information

Invoice Number: 32908
Vendor: Duggins Wren Mann & Romero, LLP
Address: 600 Congress Ave Suite 1900, Austin, TX, 78701, United States of America
Tax ID: 27-5110427
Invoice Date: 12/05/2019
Received Date: 12/05/2019
Project: AEPD056092-AEP Texas EECRF
Posting Status: Posted

Billing Start Date: 11/01/2019
Billing End Date: 11/30/2019

Submitted Total: \$2,916
Submitted Currency: USD
Tax Rate: 0%
PS Voucher: 02475214
Approved Total: \$2,713 55

Invoice Summary

Type	Rate x Units	Discount	AEP Disc	Adjustment	AEP Split	Tax	Amount
Fees	2,892	0	202.45	0	0	0	2,689.55
Expenses	24	0	N/A	0	0	0	24
Invoice Total	2,916	0	202.45	0	0	0	2,713.55

Line Items

Item	Date	Type	Category	TK	Rate	Units	Disc	Adj	Amt
1	11/01/2019	Fee	L210 Pleadings	Pearsall, Patrick	335	0.1	2.34	2.34	31.16
	Activity: A108 Communicate (other external)								
	Description: Pleadings Communicate with other external Staff and Intervenor counsel re motion to admit additional evidence								
	Adjustment: 12/05/2019 - Amount adjusted by 2.34 - system, system								
	Reason for Adjustment: Discount Agreement								
2	11/04/2019	Fee	L210 Pleadings	Pearsall, Patrick	335	0.2	4.69	4.69	62.31
	Activity: A108 Communicate (other external)								
	Description: Pleadings Communicate with other external TIEC counsel J. Zhu re TIEC position on motion to admit additional evidence								
	Adjustment: 12/05/2019 - Amount adjusted by 4.69 - system, system								
	Reason for Adjustment: Discount Agreement								
3	11/04/2019	Fee	L210 Pleadings	Pearsall, Patrick	335	0.3	7.04	7.04	93.46
	Activity: A103 Draft/revise								
	Description: Pleadings Draft/Revise motion to admit additional evidence								
	Adjustment: 12/05/2019 - Amount adjusted by 7.04 - system, system								
	Reason for Adjustment: Discount Agreement								
4	11/22/2019	Fee	L120 Analysis/Strategy	Pearsall, Patrick	335	0.3	7.04	7.04	93.46
	Activity: A106 Communicate (with client)								
	Description: Analysis/Strategy Communicate with client M. Gage re timing of final order.								
	Adjustment: 12/05/2019 - Amount adjusted by 7.04 - system, system								
	Reason for Adjustment: Discount Agreement								
5	11/22/2019	Fee	L120 Analysis/Strategy	Pearsall, Patrick	335	0.2	4.69	4.69	62.31
	Activity: A108 Communicate (other external)								
	Description: Analysis/Strategy Communicate with other external Staff counsel R. Robles re timing of issuance of final order								
	Adjustment: 12/05/2019 - Amount adjusted by 4.69 - system, system								
	Reason for Adjustment: Discount Agreement								
6	11/25/2019	Fee	L120 Analysis/Strategy	Pearsall, Patrick	335	2.2	51.59	51.59	685.41
	Activity: A104 Review/analyze								
	Description: Analysis/Strategy Review/Analyze proposed order and issues re need for potential corrections								
	Adjustment: 12/05/2019 - Amount adjusted by 51.59 - system, system								
	Reason for Adjustment: Discount Agreement								
7	11/25/2019	Fee	L120 Analysis/Strategy	Green, Stephanie	230	3.1	49.91	49.91	663.09
	Comments to Requestor: 7% discount to vendor fees per billing discount agreement								

	Activity: A104 Review/analyze Description: Analysis/Strategy Review/Analyze compare OPDM proposed order for substantive correctness and changes to proposed order in matter, summarize changes Adjustment: 12/05/2019 - Amount adjusted by 49 91 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 7% discount to vendor fees per billing discount agreement								
8	11/26/2019	Fee	L120 Analysis/Strategy	Pearsall, Patrick	335	0 8	18 76	18 76	249 24
	Activity: A106 Communicate (with client) Description: Analysis/Strategy Communicate with client M Gage, P Osterloh, R Cavazos re potential corrections to proposed order Adjustment: 12/05/2019 - Amount adjusted by 18 76 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 7% discount to vendor fees per billing discount agreement								
9	11/26/2019	Fee	L460 Post-Trial Motions and Submissions	Green, Stephanie	230	0 7	11 27	11 27	149 73
	Activity: A106 Communicate (with client) Description: Post-Trial Motions and Submissions Communicate with client M Gage, P Osterloh et al. re corrections to proposed order Adjustment: 12/05/2019 - Amount adjusted by 11 27 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 7% discount to vendor fees per billing discount agreement								
10	11/29/2019	Fee	L460 Post-Trial Motions and Submissions	Green, Stephanie	230	1 2	19 32	19 32	256 68
	Activity: A103 Draft/revise Description: Post-Trial Motions and Submissions Draft/Revise pleading for corrections to proposed order. Adjustment: 12/05/2019 - Amount adjusted by 19 32 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 7% discount to vendor fees per billing discount agreement								
11	11/30/2019	Fee	L210 Pleadings	Pearsall, Patrick	335	1 1	25 8	25 8	342 7
	Activity: A103 Draft/revise Description: Pleadings Draft/Revise proposed corrections to proposed order Adjustment: 12/05/2019 - Amount adjusted by 25 8 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 7% discount to vendor fees per billing discount agreement								
12	11/04/2019	Expense	E107 Delivery services/messengers		12	1	0	0	12
	Activity: Description: Delivery Services/Messengers Delivery Service from Public Utility Commission of TX								
13	11/04/2019	Expense	E107 Delivery services/messengers		12	1	0	0	12
	Activity: Description: Delivery Services/Messengers Delivery Service to Public Utility Commission of TX.								

Completed Requests

Item	Request Name	Requestor	Request Date	Completion Date	Comment	Outcome
1	Post Invoice for 2,713 55 USD	Duggins Wren Mann & Romero, LLP	12/05/2019	12/06/2019		Approved
Approval History						
	Stop	Performer	Activity	Date/Time	Internal Comment	
	1	Ryan, Rhonda C	Approved	12/06/2019 07 49 AM		



Invoice

Customer Number
1068
Invoice Number
110216
Invoice Date
11/9/2019
Invoice Period
11/3/2019-11/9/2019

Date Ready Order Type Deliver Date	Order ID Caller	Origin	Destination	References
11/4/2019 3:24 PM Rush Bike	878441	Duggins Wren Mann & Romero 600 Congress Ave Ste 1900 Austin TX 78701-3348	Public Utility Commission of Tex. 1701 N Congress Ave Austin TX 78701-1494	PJP 12758-467
11/4/2019 3:53 PM	Tammy Mitchell (512) 744-9300			
			Rush Bike	\$12.00
POD: Fsc			Order Total:	\$12.00
11/4/2019 3:54 PM Rush Bike	878441 01	Public Utility Commission of Texas 1701 N Congress Ave Austin TX 78701-1494	Duggins Wren Mann & Romero 600 Congress Ave Ste 1900 Austin TX 78701-3348	PJP 12758-467
11/4/2019 4:17 PM	Tammy Mitchell (512) 744-9300			
			Rush Bike	\$12.00
POD: Nancy			Order Total:	\$12.00

Header Information

Invoice Number: 33202
Vendor: Duggins Wren Mann & Romero, LLP
Address: 600 Congress Ave Suite 1900, Austin, TX, 78701, United States of America
Tax ID: 27-5110427
Invoice Date: 01/13/2020
Received Date: 01/22/2020
Project: AEPD056092-AEP Texas EECRF
Posting Status: Posted

Billing Start Date: 12/01/2019
Billing End Date: 12/31/2019

Submitted Total: \$3,734.5
Submitted Currency: USD
Tax Rate: 0%
PS Voucher: 02485943
Approved Total: \$3,475.05

Invoice Summary

Type	Rate x Units	Discount	AEP Disc	Adjustment	AEP Split	Tax	Amount
Fees	3,706.5	0	259.45	0	0	0	3,447.05
Expenses	28	0	N/A	0	0	0	28
Invoice Total	3,734.5	0	259.45	0	0	0	3,475.05

Line Items

Item	Date	Type	Category	TK	Rate	Units	Disc	Adj	Amt
1	12/01/2019	Fee	L210 Pleadings	Pearsall, Patrick	335	0.3	7.04	7.04	93.46
	Activity: A104 Review/analyze								
	Description: Pleadings Review/Analyze issues re corrections to proposed order								
	Adjustment: 01/22/2020 - Amount adjusted by 7.04 - system, system								
	Reason for Adjustment: Discount Agreement								
2	12/02/2019	Fee	L210 Pleadings	Pearsall, Patrick	335	0.5	11.72	11.72	155.78
	Activity: A104 Review/analyze								
	Description: Pleadings Review/Analyze issues re scope and necessity of corrections to proposed order								
	Adjustment: 01/22/2020 - Amount adjusted by 11.72 - system, system								
	Reason for Adjustment: Discount Agreement								
3	12/02/2019	Fee	L210 Pleadings	Pearsall, Patrick	335	0.3	7.04	7.04	93.46
	Activity: A103 Draft/revise								
	Description: Pleadings Draft/Revise pleading outlining corrections to proposed order								
	Adjustment: 01/22/2020 - Amount adjusted by 7.04 - system, system								
	Reason for Adjustment: Discount Agreement								
4	12/02/2019	Fee	L210 Pleadings	Pearsall, Patrick	335	0.2	4.69	4.69	62.31
	Activity: A106 Communicate (with client)								
	Description: Pleadings Communicate with client litigation team re corrections to proposed order								
	Adjustment: 01/22/2020 - Amount adjusted by 4.69 - system, system								
	Reason for Adjustment: Discount Agreement								
5	12/02/2019	Fee	L460 Post-Trial Motions and Submissions	Green, Stephanie	230	0.4	6.44	6.44	85.56
	Activity: A104 Review/analyze								
	Description: Post-Trial Motions and Submissions Review/Analyze feedback from J. Jackson re proposed order changes suggested by OPDM and corrections to be filed								
	Adjustment: 01/22/2020 - Amount adjusted by 6.44 - system, system								
	Reason for Adjustment: Discount Agreement								
6	12/02/2019	Fee	L460 Post-Trial Motions and Submissions	Green, Stephanie	230	0.1	1.61	1.61	21.39
	Activity: A106 Communicate (with client)								
	Description: Post-Trial Motions and Submissions Communicate with client J. Jackson re OPDM proposed order changes requiring correction								
	Adjustment: 01/22/2020 - Amount adjusted by 1.61 - system, system								
	Reason for Adjustment: Discount Agreement								

7	12/02/2019	Fee	L460 Post-Trial Motions and Submissions	Green, Stephanie	230	0 6	9 66	9.66	128 34
	Activity: A103 Draft/revise Description: Post-Trial Motions and Submissions Draft/Revise pleading re corrections to proposed order Adjustment: 01/22/2020 - Amount adjusted by 9 66 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 7% discount to vendor fees per billing discount agreement								
8	12/03/2019	Fee	L210 Pleadings	Pearsall, Patrick	335	1 1	25 8	25 8	342 7
	Activity: A103 Draft/revise Description: Pleadings Draft/Revise pleading re proposed corrections to proposed order Adjustment: 01/22/2020 - Amount adjusted by 25 8 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 7% discount to vendor fees per billing discount agreement								
9	12/03/2019	Fee	L210 Pleadings	Pearsall, Patrick	335	0 5	11 72	11.72	155 78
	Activity: A106 Communicate (with client) Description: Pleadings Communicate with client M Gage re scope of corrections to proposed order Adjustment: 01/22/2020 - Amount adjusted by 11 72 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 7% discount to vendor fees per billing discount agreement								
10	12/03/2019	Fee	L120 Analysis/Strategy	Green, Stephanie	230	0 2	3 22	3 22	42 78
	Activity: A104 Review/analyze Description: Analysis/Strategy Review/Analyze authority re cost cap calculation Adjustment: 01/22/2020 - Amount adjusted by 3 22 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 7% discount to vendor fees per billing discount agreement								
11	12/03/2019	Fee	L460 Post-Trial Motions and Submissions	Green, Stephanie	230	0 4	6 44	6 44	85.56
	Activity: A106 Communicate (with client) Description: Post-Trial Motions and Submissions Communicate with client M Gage et al re corrections Adjustment: 01/22/2020 - Amount adjusted by 6 44 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 7% discount to vendor fees per billing discount agreement								
12	12/04/2019	Fee	L210 Pleadings	Pearsall, Patrick	335	0 2	4 69	4 69	62 31
	Activity: A103 Draft/revise Description: Pleadings Draft/Revise and finalize pleading re corrections to proposed order Adjustment: 01/22/2020 - Amount adjusted by 4 69 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 7% discount to vendor fees per billing discount agreement								
13	12/04/2019	Fee	L210 Pleadings	Pearsall, Patrick	335	0 2	4 69	4.69	62 31
	Activity: A108 Communicate (other external) Description: Pleadings Communicate with other external Staff and intervenor counsel re pleading to correct proposed order Adjustment: 01/22/2020 - Amount adjusted by 4 69 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 7% discount to vendor fees per billing discount agreement								
14	12/09/2019	Fee	L120 Analysis/Strategy	Pearsall, Patrick	335	0 1	2 34	2 34	31 16
	Activity: A104 Review/analyze Description: Analysis/Strategy Review/Analyze OPDM filings re appropriateness of corrections to proposed order Adjustment: 01/22/2020 - Amount adjusted by 2.34 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 7% discount to vendor fees per billing discount agreement								
15	12/11/2019	Fee	L120 Analysis/Strategy	Pearsall, Patrick	335	0 2	4 69	4 69	62.31
	Activity: A106 Communicate (with client) Description: Analysis/Strategy Communicate with client M Gage re concerns and strategy for Open Meeting Adjustment: 01/22/2020 - Amount adjusted by 4 69 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 7% discount to vendor fees per billing discount agreement								
16	12/12/2019	Fee	L120 Analysis/Strategy	Pearsall, Patrick	335	0 6	14 07	14 07	186 93
	Activity: A106 Communicate (with client) Description: Analysis/Strategy Communicate with client re Chairman memorandum recommending revisions to proposed order.								

	Adjustment: 01/22/2020 - Amount adjusted by 14 07 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 7% discount to vendor fees per billing discount agreement								
17	12/12/2019	Fee	L210 Pleadings	Pearsall, Patrick	335	0 2	4 69	4 69	62 31
	Activity: A103 Draft/revise Description: Pleadings Draft/Revise letter addressing correction to errors in Commissioners' memorandum revising proposed order Adjustment: 01/22/2020 - Amount adjusted by 4 69 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 7% discount to vendor fees per billing discount agreement								
18	12/12/2019	Fee	L120 Analysis/Strategy	Pearsall, Patrick	335	0 3	7 04	7 04	93 46
	Activity: A104 Review/analyze Description: Analysis/Strategy Review/Analyze issues re Chairman memorandum. Adjustment: 01/22/2020 - Amount adjusted by 7 04 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 7% discount to vendor fees per billing discount agreement								
19	12/12/2019	Fee	L460 Post-Trial Motions and Submissions	Green, Stephanie	230	0 5	8 05	8 05	106 95
	Activity: A103 Draft/revise Description: Post-Trial Motions and Submissions Draft/Revise letter re Chairman's proposed order revisions and memo. Adjustment: 01/22/2020 - Amount adjusted by 8.05 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 7% discount to vendor fees per billing discount agreement								
20	12/12/2019	Fee	L460 Post-Trial Motions and Submissions	Green, Stephanie	230	0 1	1 61	1 61	21.39
	Activity: A104 Review/analyze Description: Post-Trial Motions and Submissions Review/Analyze memo issued from Chairman re proposed order Adjustment: 01/22/2020 - Amount adjusted by 1 61 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 7% discount to vendor fees per billing discount agreement								
21	12/12/2019	Fee	L460 Post-Trial Motions and Submissions	Green, Stephanie	230	0 1	1 61	1 61	21 39
	Activity: A106 Communicate (with client) Description: Post-Trial Motions and Submissions Communicate with client M Gage et al re Chairman memo Adjustment: 01/22/2020 - Amount adjusted by 1 61 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 7% discount to vendor fees per billing discount agreement								
22	12/13/2019	Fee	L230 Court Mandated Conferences	Pearsall, Patrick	335	0 5	11 72	11 72	155 78
	Activity: A106 Communicate (with client) Description: Court Mandated Conferences Communicate with client G. Hughes and M Gage re response to Chairman memorandum re proposed order and Open Meeting strategy Adjustment: 01/22/2020 - Amount adjusted by 11 72 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 7% discount to vendor fees per billing discount agreement								
23	12/13/2019	Fee	L230 Court Mandated Conferences	Pearsall, Patrick	335	2 5	58 62	58 62	778 88
	Activity: A109 Appear for/attend Description: Court Mandated Conferences Appear for/attend Open Meeting Adjustment: 01/22/2020 - Amount adjusted by 58 62 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 7% discount to vendor fees per billing discount agreement								
24	12/13/2019	Fee	L230 Court Mandated Conferences	Green, Stephanie	230	2 5	40 25	40 25	534 75
	Activity: A109 Appear for/attend Description: Court Mandated Conferences Appear for/attend PUCT Open Meeting with client M Gage et al Adjustment: 01/22/2020 - Amount adjusted by 40 25 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 7% discount to vendor fees per billing discount agreement								
25	12/04/2019	Expense	E107 Delivery services/messengers		8	1	0	0	8
	Activity: Description: Delivery Services/Messengers Delivery Service from Public Utility Commission of TX/ corrections to PO								
26	12/04/2019	Expense	E107 Delivery services/messengers		10	1	0	0	10
	Activity:								

Description: Delivery Services/Messengers Delivery Service to Public Utility Commission of TX/ corrections to PO									
27	12/13/2019	Expense	E109 Local travel		10	1	0	0	10
Activity:									
Description: Local Travel Parking - PUC Open Meeting									

Completed Requests

Item	Request Name	Requestor	Request Date	Completion Date	Comment	Outcome
1	Post Invoice for 3,475 05 USD	Duggins Wren Mann & Romero, LLP	01/22/2020	01/22/2020		Approved
	Approval History					
	Stop	Performer	Activity	Date/Time	Internal Comment	
	1	Ryan, Rhonda C	Approved	01/22/2020 09 34 AM		



Invoice

Customer Number
1068
Invoice Number
110543
Invoice Date
12/7/2019
Invoice Period
12/1/2019-12/7/2019

Date Ready Order Type Deliver Date	Order ID Caller	Origin	Destination	References
12/4/2019 3:00 PM ASAP Bike	880484	Duggins Wren Mann & Romero 600 Congress Ave Austin TX 78701-3348	Public Utility Commission of Tex 1701 Congress Ave Austin TX 78701-1402	12758-467/PJS corrections to PO
12/4/2019 3:45 PM	Michele Barker (512) 744-9300		ASAP Bike	\$10.00 497053
POD: Fsc			Order Total:	\$10.00
12/4/2019 3:45 PM 1 Hour Bike	880484 01	Public Utility Commission of Texas 1701 Congress Ave Austin TX 78701-1402	Duggins Wren Mann & Romero 600 Congress Ave Austin TX 78701-3348	12758-467/PJS corrections to PO
12/4/2019 4:06 PM	Michele Barker (512) 744-9300		1 Hour Bike	\$8.00 497054
POD: Nancy			Order Total:	\$8.00

Receipt

P/S #03 A Payment No. 00000001
 I/D #02 Ticket No. 014473
 Entry Time 12/13/2019 (Fri) 7:43
 Exit Time 12/13/2019 (Fri) 11:04
 Parking Time 3: P
 Parking Fee Rate A \$10.00
 MASTERCARD
 Account # *****0711
 Slip # 18274
 Auth Code 0000247877
 Credit Card Amount \$10.00
 Cash Amount \$0.00
 Total \$10.00

Thank You for Your Visit
 Please Come Again !



CITY ATTORNEY'S OFFICE

P.O. Box 220
McAllen, Texas 78505-0220
956-681-1090 Office
956-681-1099 Fax
www.mcallen.net

September 25, 2019

Ms. Melissa A. Gage
American Electric Power Service Corp.
400 West 15th Street, Suite 1500
Austin, Texas 78701-1677

Re: AEP TX 2020 EECRF Filing; Lloyd Gosselink; Inv. #97502422

Dear Ms. Gage:

Pursuant to Public Utility Regulatory Act §33.023, please remit to the City of McAllen, Texas the sum of \$3,616.30 cover the fees and expenses of attorneys and consultants assisting the Steering Committee of Cities Served by AEP Texas Central Company in the above-referenced ratemaking proceeding.

The requested sum consists of fees and expenses of the following firm:

FIRM	DOCKET	PERIOD	BILL AMOUNT
Lloyd, Gosselink	AEP Tx 2020 EECRF Filing	June 2019	\$3,616.30

The billing has been reviewed by Cities and found to be consistent with ratemaking efforts authorized by Cities. The billing is reasonable.

Payment should be made to the City of McAllen immediately. The check should be made payable to the **City of McAllen** and should be addressed as follows:

CITY OF McALLEN – LEGAL DEPARTMENT
P. O. BOX 220 – McALLEN, TEXAS 78505-0220

Should you have any questions, please do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read "KDP", with a checkmark at the end.

Kevin D. Pagan
Special Counsel

KDP:av
encls.

July 9, 2019

Cities Served by AEP Texas Inc
c/o City of McAllen
Attn Kevin Pagan
P O Box 22
McAllen, TX USA 78505-0220

Invoice: 97502422
Client: 3862
Matter: 6
Billing Attorney: JLM

INVOICE SUMMARY

For professional services and disbursements rendered through June 30, 2019:

RE: AEP Tx 2020 EECRF Filing

Professional Services	\$ 2,988.00
Total Disbursements	<u>\$ 628.30</u>
TOTAL THIS INVOICE	\$ 3,616.30

Lloyd Gosselink Rochelle & Townsend, P.C.

Cities Served by AEP Texas Inc
AEP Tx 2020 EECRF Filing
I.D.3862-6-JLM

July 9, 2019
Invoice: 97502422

PROFESSIONAL SERVICES RENDERED

Date	Atty	Description Of Services Rendered	Hours
6/03/19	TLB	Review filing; send client communication (Administration).	.50
6/03/19	JLM	Review EECRF filing; draft correspondence to cities (Administration).	1.40
6/03/19	SJW	Distribute protective order certification for execution; prepare motion to intervene for T. Brocato review; draft protective order certification cover letter; prepare motion to intervene for filing and file with PUC; make copy of application (Admin/Case Management).	.50
6/04/19	JLM	Review EECRF filing and procedural schedule (Administration).	.50
6/04/19	SJW	Revise Motion to Intervene to include additional cities; prepare Motion for filing and file with the PUC (Admin/Case Management).	.50
6/04/19	SJW	Revise cover letter to include SOAH docket number; email K. Nalepa regarding protective order certification; review Order of Referral and calendar deadlines; review executed engagement agreement and protective order certification for K. Nalepa; prepare protective order certification for filing and file with PUC (Admin/Case Management).	.70
6/05/19	SJW	Draft supplemental motion to intervene; draft list of issues (Admin/Case Management).	.70
6/06/19	SJW	Revise supplemental motion to intervene; prepare motion for filing and file with PUC (Admin/Case Management).	.50
6/07/19	TLB	Review filings; send client communication (Administration).	.50
6/07/19	JLM	Telephone call and correspondence with PUC Staff regarding procedural schedule (Administration).	.40
6/07/19	SJW	Draft 2nd supplemental motion to intervene (Admin/Case Management).	.10
6/09/19	JLM	Review application and testimony (Administration).	1.00
6/10/19	JLM	Telephone call with PUC Staff regarding procedural schedule (Administration).	.20
6/11/19	JLM	Telephone call with K. Nalepa regarding list of issues; draft list of issues (Administration).	.50
6/11/19	SJW	Review recent filing (Admin/Case Management).	.10
6/12/19	SJW	Review agreed procedural schedule and calendar tentative deadlines (Admin/Case Management).	.30
6/13/19	JLM	Revise Second Supplemental Motion to Intervene (Administration).	.20
6/13/19	SJW	Prepare list of issues for filing and file with PUC; revise 2nd supplemental motion to intervene; discuss deadlines with internal support staff; case management (Admin/Case Management).	.90
6/14/19	SJW	Prepare 2nd supplemental motion to intervene for filing and file with PUC; review recent filings update calendared deadlines (Admin/Case Management).	.30
6/17/19	JLM	Review filings (Administration).	.50
6/17/19	SJW	Review recent filing; discuss upcoming deadlines with J. Mauldin (Admin/Case Management).	.30
6/18/19	SJW	Create rate case expense tracking chart and update chart with latest invoice	.20

Lloyd Gosselink Rochelle & Townsend, P.C.

Page|2

Lloyd Gosselink Rochelle & Townsend, P.C.

Cities Served by AEP Texas Inc
AEP Tx 2020 EECRF Filing
I.D.3862-6-JLM

July 9, 2019
Invoice: 97502422

Date	Atty	Description Of Services Rendered	Hours
		(Admin/Case Management).	
6/20/19	JLM	Review preliminary order (Administration).	.20
6/20/19	SJW	Review recent filing (Admin/Case Management).	.10
6/26/19	JLM	Telephone call with K. Nalepa regarding status of discovery (Administration).	.20
6/27/19	JLM	Review RFI responses (Administration).	.70
6/30/19	TLB	Review filings and email communication (Administration).	.70

TOTAL PROFESSIONAL SERVICES

\$ 2,988.00

SUMMARY OF PROFESSIONAL SERVICES

Name	Staff Level	Hours	Rate	Total
Thomas L Brocato	Principal	1.70	420.00	714.00
Jamie L Mauldin	Associate	5.80	280.00	1,624.00
Sam J Weaver	Paralegal	5.20	125.00	650.00
TOTALS		12.70		\$ 2,988.00

DISBURSEMENTS

Date	Description	Amount
	Photocopying	30.30
6/15/19	Corporate Couriers Check # - 000036983 Corporate Couriers, Courier Services, 6/15/2019	24.00
6/15/19	Corporate Couriers Check # - 000036983 Corporate Couriers, Courier Services, 6/15/2019	12.00
6/15/19	Corporate Couriers Check # - 000036983 Corporate Couriers, Courier Services, 6/15/2019	22.00
6/30/19	ReSolved Energy Cons Voucher # - 000100269 ReSolved Energy Consulting, LLC, Consultant Services, Professional services for June 2019 - Regarding LG AEP 19 EECRF 49592 project, 7/3/2019	540.00

TOTAL DISBURSEMENTS

\$ 628.30

TOTAL THIS INVOICE

\$ 3,616.30

Lloyd Gosselink Rochelle & Townsend, P.C.

Page|3

User	Printer/Copier	Date	Client	Matter	#Copies
ricoh	Alysheba	6/3/2019	3862	6	54
ricoh	Alysheba	6/3/2019	3862	6	1
ricoh	Alysheba	6/3/2019	3862	6	26
ricoh	Alysheba	6/3/2019	3862	6	1
ricoh	Alysheba	6/3/2019	3862	6	25
ricoh	Alysheba	6/3/2019	3862	6	1
ricoh	Alysheba	6/3/2019	3862	6	14
ricoh	Alysheba	6/3/2019	3862	6	1
ricoh	Alysheba	6/3/2019	3862	6	76
ricoh	Alysheba	6/3/2019	3862	6	1
ricoh	Alysheba	6/3/2019	3862	6	103

303

303 copies x 10¢ per page = \$ 30.30