

treatment plant. The secondary pond would continue to receive water from the primary pond, and then discharge the treated combined effluent via Outfall 101 into SWEPCO Lake. SWEPCO is soliciting ADEQ's agreement that no additional treatment will be required, that no liner will be required in either the primary or secondary ash ponds, and that Outfall 101 will continue at its current location as is contained in the pre-draft NPDES renewal permit. Note: following PE certification of ash removal from the primary ash pond, SWEPCO will update the name of this pond to the "Primary Settling Pond", or similar name.

2 – New coal pile run-off ponds:

SWEPCO is proposing to construct two new ponds, operating in series, dedicated to receiving coal pile runoff. The primary coal pile runoff pond would be located immediately east of the coal pile, and the second runoff pond would receive flow from the primary runoff pond but would be located within the current footprint of the primary ash pond. Polymer chemicals may be used to aid settling of fine coal particles in the ponds as needed. The ponds would be monitored to determine the amount of fines contained and accumulated coal would be periodically removed and placed back on the coal pile for combustion in the plant's boiler. The ponds would be constructed to facilitate removal of accumulated coal and may include concrete or other foundation sufficient to support heavy equipment, but no liner is currently planned. SWEPCO would like to continue to have the coal pile runoff stream be a constituent of wastewater Outfall 101, and identify the two new coal pile runoff ponds as new best management practices under the current permit requirement (Part II, Other Conditions, Item No. 7), and be monitored at the current wastewater Outfall 101.

SWEPCO is soliciting ADEQ's agreement that these two proposed unlined coal pile runoff ponds:

1. Be considered as storm water best management practices,
2. That the discharge from the ponds to the primary ash pond would continue as a source of wastewater to Outfall 101, and
3. That TSS would continue to be monitored at Outfall 101 as is currently the case.

3 – Regulation of demineralizer waste streams

Upon completion and connection of the proposed submerged flight conveyor system, ash would no longer be sluiced to the primary ash pond. At that time, Flint Creek would also lose the exclusion currently available for hazardous waste management due to co-disposal of demineralizer waste streams with coal ash (Bevill Amendment exclusion). The demineralizer process generates wastewater with pH ranging from less than 2 to greater than 12.5 standard units, making them otherwise potentially subject to hazardous waste regulation. SWEPCO is considering mixing the acidic and caustic phases in a RCRA elementary neutralization unit, rendering the mixture non-hazardous for subsequent discharge to the primary ash pond. SWEPCO is requesting agreement by ADEQ regarding the general intent to neutralize the demineralizer regeneration waste streams within the pH range of 2 – 12.5, then discharge them as a source of wastewater to Outfall 101.

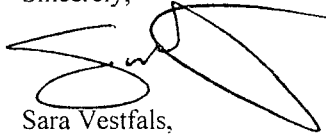
As time is of the essence to achieve compliance with the referenced regulations with this project, any expedited attention that can be given to these questions would very much be appreciated.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the

information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Upon ADEQ's review of the attached document, please contact either Randy Solomon at 214-777-1043, or Scott Carney at 479-444-4726, and we will set up a conference call to discuss these items.

Sincerely,

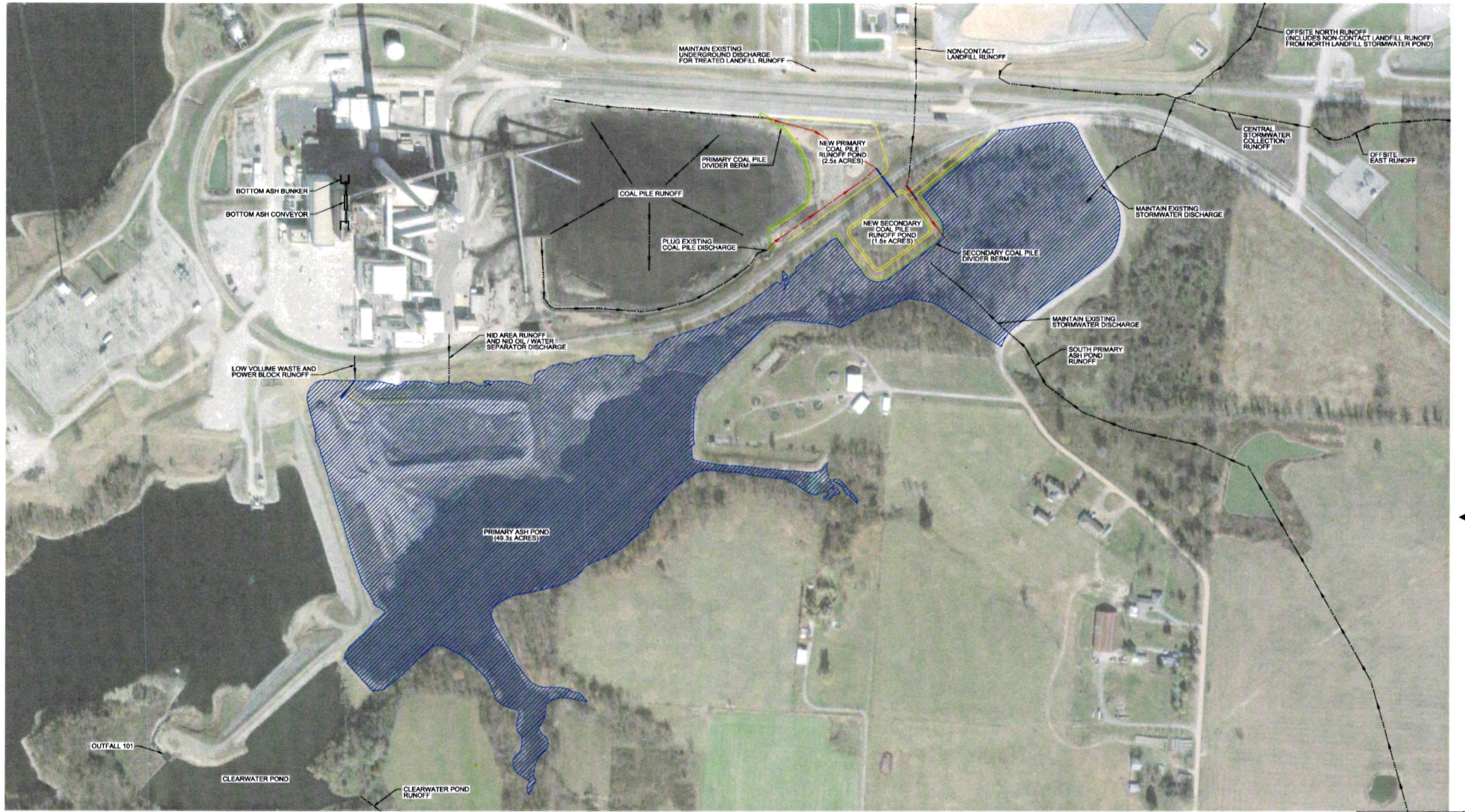
A handwritten signature in black ink, appearing to read 'Sara Vestfals', with a large, stylized flourish extending to the right.

Sara Vestfals,
Manager, Flint Creek Power Plant

Cc: David Hall (ec)
Scott Carney (ec)
Ivaunna Neigler (ec)
Randy Solomon
File: FLC 180.05.2020

Attachment

**Southwestern Electric Power Company
Flint Creek Power Plant
Aerial Photo – New Proposed Coal Pile Runoff Ponds**



LEGEND

- AREA TO BE CLEANED
- EXISTING FLOW PATH
- NEW FLOW PATH
- WATERSHED BOUNDARY
- CULVERT

PRELIMINARY - NOT FOR CONSTRUCTION

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SOAH DOCKET NO. 473-21-0538
PUC DOCKET NO. 51415
Direct Testimony of Devi Glick, Exhibit DG-3

Exhibit DG-3

SWEPCO Responses to Requests for Information, Public

Data Request	File Type
SWEPCO Response to Sierra Club 1-7	PDF
SWEPCO Response to Sierra Club 1-7, Attachment 2	PDF
SWEPCO Response to Sierra Club 1-7, Attachment 3	PDF
SWEPCO Response to Sierra Club 1-8	PDF
SWEPCO Response to Sierra Club 1-9	PDF
SWEPCO Response to Sierra Club 1-9, Attachment 1	PDF
SWEPCO Response to Sierra Club 2-2	PDF
SWEPCO Response to Sierra Club 2-3	PDF
SWEPCO Response to Sierra Club 2-6	PDF
SWEPCO Response to Sierra Club 2-13	PDF
SWEPCO Response to Sierra Club 2-17	PDF
SWEPCO Response to Sierra Club 3-1	PDF
SWEPCO Response to Sierra Club 3-2	PDF
SWEPCO Response to Sierra Club 4-1	PDF
SWEPCO Response to Sierra Club 5-2	PDF
SWEPCO Response to CARD 1-16, Supplemental	PDF
SWEPCO Response to CARD 1-16, Supplemental Attachment 2	PDF
SWEPCO Response to CARD 2-10, Supplemental	PDF
SWEPCO Response to CARD 2-10, Supplemental Attachment 2	Excel

*CONFIDENTIAL Excel files were submitted via CD to the Commission pursuant to TAC § 22.71(d).

**SOAH DOCKET NO. 473-21-0538
PUC DOCKET NO. 51415**

**SOUTHWESTERN ELECTRIC POWER COMPANY'S RESPONSE TO SIERRA
CLUB'S FIRST SET OF REQUESTS FOR INFORMATION**

Question No. Sierra Club 1-5:

For each of the Company's coal- or solid-fuel units (Dolet Hills, Flint Creek, Pirkey, Turk, and Welsh), please produce any analysis or assessment conducted since 2015, of the economics of continued operation, i.e., a retirement study, of the unit or any unit replacement studies done by the Company.

Response No. Sierra Club 1-5:

Please see Sierra Club 1-5 Attachment 1 for the results of a Pirkey unit disposition analysis conducted at the request of stakeholders during the 2018 SWEPCO Arkansas IRP process. Please see Sierra Club 1-5 HIGHLY SENSITIVE Attachment 2 and Sierra Club 1-5 HIGHLY SENSITIVE Attachment 3 for the results of a 2019 Dolet Hills unit disposition analysis. Please see Sierra Club 1-5 HIGHLY SENSITIVE Attachment 4 and Sierra Club 1-5 HIGHLY SENSITIVE Attachment 5 for the results of a 2020 Dolet Hills unit disposition analysis. Please see Sierra Club 1-5 HIGHLY SENSITIVE Attachment 6 for the results of the 2020 analysis to evaluate the economics of making CCR and ELG retrofits at the Flint Creek, Pirkey and Welsh units.

Sierra Club 1-5 HIGHLY SENSITIVE Attachments 2 through 6 responsive to this request are HIGHLY SENSITIVE PROTECTED MATERIAL under the terms of the Protective Order. Due to current restrictions associated with COVID-19, this information is being provided electronically and a secure login to access the information will be provided upon request to individuals who have signed the Protective Order Certification.

Prepared By: Mark A. Becker

Title: Mng Dir Res Plnning&Op Anlysis

Prepared By: Joseph S. Perez

Title: Forecast Analyst Prin

Sponsored By: Thomas P. Brice

Title: VP Regulatory & Finance

Sponsored By: Monte A. McMahon

Title: VP Generating Assets SWEPCO

**SOAH DOCKET NO. 473-21-0538
PUC DOCKET NO. 51415**

**SOUTHWESTERN ELECTRIC POWER COMPANY'S RESPONSE TO SIERRA
CLUB'S FIRST SET OF REQUESTS FOR INFORMATION**

Question No. Sierra Club 1-7:

For each of the Company's coal- or solid-fuel units (Dolet Hills, Flint Creek, Pirkey, Turk, and Welsh), please provide the following historical annual data since 2010 and by month for 2019 and 2020 (or earliest available):

- a. Installed Capacity
- b. Unforced Capacity
- c. Capacity Factor
- d. Equivalent Availability Factor (EAF)
- e. Heat Rate
- f. Forced or random outage rate
- g. Effective forced outage rate (EFORd)
- h. Fixed O&M costs
- i. Non-Fuel Variable O&M costs
- j. Fuel Costs (by fuel type)

Response No. Sierra Club 1-7:

Per agreement with counsel for Sierra Club, SWEPCO is providing the following data since 2015:

a-g: The requested information for the period 2015 - November 2020 is provided in Sierra Club 1-7 Highly Sensitive Confidential Attachment 1.

h-i: From an Accounting perspective, the Company does not separately track variable and fixed O&M costs. For the period 2015 - November 2020, total O&M for each of SWEPCO's solid fuel units is provided in Sierra Club 1-7 Attachment 2.

j: For the eligible solid fuel costs, please refer to Sierra Club 1-7 Attachment 3.

Sierra Club 1-7 HIGHLY SENSITIVE Attachment 1 responsive to this request is HIGHLY SENSITIVE PROTECTED MATERIAL under the terms of the Protective Order. Due to current restrictions associated with COVID-19, this information is being provided electronically and a secure login to access the information will be provided upon request to individuals who have signed the Protective Order Certification.

Prepared By: Tara D. Beske

Title: Regulatory Consultant Staff

Exhibit DG-3

Prepared By: Michael H. Ward

Title: Regulatory Consultant Staff

Sponsored By: Amy E. Jeffries

Title: Coal Procurement Mgr

Sponsored By: Monte A. McMahon

Title: VP Generating Assets SWEPCO

**SWEPCO Generation Solid Fuel Unit
Annual O&M for the Period 2015 - 2018**

Unit	2015	2016	2017	2018
Dolet Hills	\$20,260,071	\$20,976,483	\$20,613,371	\$17,130,286
Flint Creek	\$16,498,691	\$21,014,690	\$17,900,009	\$19,294,844
Pirkey	\$26,166,028	\$22,118,487	\$20,989,822	\$21,681,269
Turk	\$24,174,600	\$23,214,029	\$22,479,710	\$22,688,161
Welsh 0	\$15,858,249	\$18,355,445	\$15,301,908	\$15,808,434
Welsh 1	\$3,855,594	\$10,305,616	\$1,821,337	\$4,452,094
Welsh 3	\$8,436,981	\$4,932,485	\$4,696,583	\$3,487,476

**SWEPCO Generation Solid Fuel Unit
Monthly O&M for the Period January 2019 - November 2020**

Unit	2019	2020	Unit	2019	2020
Dolet Hills	\$12,307,859	\$11,537,702	Turk	\$21,345,975	\$20,384,993
(01) Jan	\$819,812	\$1,484,241	(01) Jan	\$1,931,532	\$1,548,813
(02) Feb	\$1,441,760	\$1,271,111	(02) Feb	\$1,577,069	\$1,583,141
(03) Mar	\$1,465,024	\$3,480,577	(03) Mar	\$1,671,273	\$1,885,464
(04) Apr	\$187,340	-\$1,151,890	(04) Apr	\$2,030,905	\$1,634,836
(05) May	\$528,010	\$638,847	(05) May	\$3,495,586	\$2,221,157
(06) Jun	\$1,438,950	\$668,435	(06) Jun	\$1,047,414	\$1,870,750
(07) Jul	\$906,326	\$1,721,398	(07) Jul	\$1,669,197	\$1,651,409
(08) Aug	\$1,378,104	\$865,553	(08) Aug	\$1,566,128	\$1,699,715
(09) Sep	\$1,052,041	\$458,285	(09) Sep	\$1,672,294	\$1,927,878
(10) Oct	\$1,208,789	\$1,368,666	(10) Oct	\$1,552,967	\$1,791,422
(11) Nov	\$1,015,813	\$732,479	(11) Nov	\$1,614,768	\$2,570,408
(12) Dec	\$865,890		(12) Dec	\$1,516,842	
Flint Creek	\$16,190,693	\$15,635,636	Welsh 0	\$15,815,372	\$13,711,305
(01) Jan	\$1,331,879	\$1,245,271	(01) Jan	\$1,315,552	\$1,196,706
(02) Feb	\$1,018,427	\$1,223,613	(02) Feb	\$1,204,683	\$1,116,810
(03) Mar	\$1,003,222	\$1,624,748	(03) Mar	\$1,215,852	\$1,287,057
(04) Apr	\$1,626,830	\$2,414,460	(04) Apr	\$1,364,871	\$796,667
(05) May	\$1,415,351	\$1,628,830	(05) May	\$1,127,232	\$1,061,953
(06) Jun	\$1,060,592	\$1,406,771	(06) Jun	\$967,194	\$1,460,908
(07) Jul	\$1,283,825	\$1,264,924	(07) Jul	\$1,300,865	\$1,134,922
(08) Aug	\$1,319,915	\$1,161,502	(08) Aug	\$1,257,968	\$1,215,005
(09) Sep	\$1,301,400	\$1,369,396	(09) Sep	\$1,212,273	\$1,435,540
(10) Oct	\$1,422,240	\$1,230,416	(10) Oct	\$2,311,885	\$1,885,992
(11) Nov	\$1,671,031	\$1,065,705	(11) Nov	\$1,073,399	\$1,119,745
(12) Dec	\$1,735,981		(12) Dec	\$1,463,598	

**SWEPCO Generation Solid Fuel Unit
Monthly O&M for the Period January 2019 - November 2020**

Unit	2019	2020	Unit	2019	2020
Pirkey	\$22,386,198	\$18,023,228	Welsh 1	\$4,075,792	\$3,318,599
(01) Jan	\$1,563,114	\$1,461,247	(01) Jan	\$239,179	\$226,687
(02) Feb	\$1,378,548	\$1,319,539	(02) Feb	\$292,869	\$133,851
(03) Mar	\$1,537,458	\$1,682,480	(03) Mar	\$627,808	\$157,423
(04) Apr	\$1,537,519	\$1,232,256	(04) Apr	\$992,568	\$248,782
(05) May	\$1,738,297	\$1,375,530	(05) May	\$473,069	\$95,427
(06) Jun	\$1,255,810	\$2,035,530	(06) Jun	\$191,944	\$181,491
(07) Jul	\$1,650,368	\$1,688,999	(07) Jul	\$150,578	\$292,941
(08) Aug	\$1,455,580	\$1,264,709	(08) Aug	\$257,866	\$292,448
(09) Sep	\$2,506,110	\$1,853,911	(09) Sep	\$59,325	\$574,121
(10) Oct	\$3,551,991	\$2,566,950	(10) Oct	\$237,607	\$887,393
(11) Nov	\$1,212,896	\$1,542,077	(11) Nov	\$196,529	\$228,035
(12) Dec	\$2,998,507		(12) Dec	\$356,450	
			Welsh 3	\$3,812,649	\$1,865,342
			(01) Jan	\$183,868	\$204,315
			(02) Feb	\$118,347	\$121,582
			(03) Mar	\$156,080	\$120,935
			(04) Apr	\$57,751	\$251,520
			(05) May	\$212,504	\$412,709
			(06) Jun	\$89,217	\$185,443
			(07) Jul	\$180,865	\$161,230
			(08) Aug	\$231,976	\$89,282
			(09) Sep	\$392,888	\$126,535
			(10) Oct	\$1,566,649	\$87,824
			(11) Nov	\$101,585	\$103,967
			(12) Dec	\$520,919	

Plant	Year	Month	Eligible Cost			Total
			Coal/Lignite	Fuel Oil	Gas	
Welsh	2015		\$ 143,318,002	\$ 2,534,273		\$ 145,852,275
Flint Creek	2015		\$ 28,600,621	\$ 289,430		\$ 28,890,051
Turk	2015		\$ 49,338,621		\$ 150,539	\$ 49,489,160
Pirkey	2015		\$ 138,247,695		\$ 256,358	\$ 138,504,053
Dolet Hills	2015		\$ 79,706,649		\$ 280,684	\$ 79,987,333
Welsh	2016		\$ 95,921,292	\$ 1,817,381		\$ 97,738,673
Flint Creek	2016		\$ 19,129,617	\$ 512,377		\$ 19,641,994
Turk	2016		\$ 54,887,412		\$ 203,785	\$ 55,091,197
Pirkey	2016		\$ 152,119,108		\$ 159,389	\$ 152,278,496
Dolet Hills	2016		\$ 64,362,101		\$ 214,878	\$ 64,576,979
Welsh	2017		\$ 130,901,847	\$ 1,372,561		\$ 132,274,408
Flint Creek	2017		\$ 25,188,969	\$ 455,433		\$ 25,644,402
Turk	2017		\$ 61,184,719		\$ 135,450	\$ 61,320,169
Pirkey	2017		\$ 122,258,810		\$ 322,168	\$ 122,580,978
Dolet Hills	2017		\$ 33,913,785		\$ 340,397	\$ 34,254,182
Welsh	2018		\$ 121,849,896	\$ 1,261,573		\$ 123,111,469
Flint Creek	2018		\$ 23,203,210	\$ 517,938		\$ 23,721,148
Turk	2018		\$ 56,052,380		\$ 420,229	\$ 56,472,608
Pirkey	2018		\$ 132,615,314		\$ 255,136	\$ 132,870,450
Dolet Hills	2018		\$ 48,882,174		\$ 1,161,126	\$ 50,043,300

Welsh	2019	January	\$ 12,841,691	\$ 43,981	\$ 12,885,672
		February	\$ 9,110,702	\$ 157,880	\$ 9,268,583
		March	\$ 10,714,859	\$ 45,688	\$ 10,760,547
		April	\$ 5,825,323	\$ 230,113	\$ 6,055,436
		May	\$ 10,429,707	\$ 100,041	\$ 10,529,748
		June	\$ 9,700,824	\$ 143,618	\$ 9,844,442
		July	\$ 9,925,957	\$ 106,963	\$ 10,032,920
		August	\$ 10,149,784	\$ 88,834	\$ 10,238,618
		September	\$ 9,001,393	\$ 34,750	\$ 9,036,143
		October	\$ 4,832,999	\$ 192,772	\$ 5,025,771
		November	\$ 9,393,916	\$ 82,461	\$ 9,476,377
		December	\$ 5,953,672	\$ 74,143	\$ 6,027,815
Flint Creek	2019	January	\$ 2,910,130	\$ 3,699	\$ 2,913,829
		February	\$ 2,510,496	\$ 7,417	\$ 2,517,913
		March	\$ 2,149,504	\$ 33,998	\$ 2,183,502
		April	\$ (48,305)	\$ 420	\$ (47,885)
		May	\$ 2,091,256	\$ 95,185	\$ 2,186,441
		June	\$ 2,086,834	\$ 19,427	\$ 2,106,261
		July	\$ 2,222,670	\$ 18,576	\$ 2,241,246
		August	\$ 2,234,552	\$ 20,180	\$ 2,254,732
		September	\$ 2,285,601	\$ 16,958	\$ 2,302,559
		October	\$ 1,459,195	\$ 15,072	\$ 1,474,267
		November	\$ 702,840	\$ 128,061	\$ 830,901
		December	\$ 1,072,724	\$ 98,624	\$ 1,171,348
Turk	2019	January	\$ 5,267,570	\$ 65,235	\$ 5,332,804
		February	\$ 4,950,244	\$ (46,508)	\$ 4,903,736
		March	\$ 5,404,213	\$ 7,108	\$ 5,411,321
		April	\$ 3,967,428	\$ 737	\$ 3,968,164
		May	\$ 1,637,922	\$ 30,994	\$ 1,668,916
		June	\$ 4,972,769	\$ 8,028	\$ 4,980,797
		July	\$ 4,722,813	\$ 3,920	\$ 4,726,733
		August	\$ 4,845,424	\$ 1,499	\$ 4,846,922
		September	\$ 5,062,356	\$ (1,280)	\$ 5,061,076
		October	\$ 4,867,982	\$ 7,274	\$ 4,875,256
		November	\$ 4,999,535	\$ (5,523)	\$ 4,994,012
		December	\$ 5,092,406	\$ 6,730	\$ 5,099,136
Pirkey	2019	January	\$ 16,328,331	\$ 33,709	\$ 16,362,040
		February	\$ 11,780,299	\$ 3,633	\$ 11,783,932
		March	\$ 12,418,150	\$ 33,411	\$ 12,451,561
		April	\$ 12,880,580	\$ 24,482	\$ 12,905,062
		May	\$ 13,964,619	\$ 24,247	\$ 13,988,865
		June	\$ 9,246,786	\$ 21,316	\$ 9,268,103
		July	\$ 11,193,951	\$ 39,584	\$ 11,233,535
		August	\$ 12,515,432	\$ 7,168	\$ 12,522,600
		September	\$ (49,528)	\$ 14,919	\$ (34,609)
		October	\$ (49,528)	\$ 8,725	\$ (40,803)
		November	\$ 3,741,262	\$ 93,396	\$ 3,834,658
		December	\$ 5,738,408	\$ 8,787	\$ 5,747,195
Dolet Hills	2019	January	\$ 1,620	\$ -	\$ 1,620
		February	\$ 1,617	\$ 4,934	\$ 6,551
		March	\$ 1,373,781	\$ -	\$ 1,373,781
		April	\$ -	\$ 44,325	\$ 44,325
		May	\$ 4,599,496	\$ 0	\$ 4,599,496
		June	\$ 12,098,749	\$ 55,649	\$ 12,154,398
		July	\$ 12,229,257	\$ 18,280	\$ 12,247,537
		August	\$ 11,877,765	\$ 29,600	\$ 11,907,364
		September	\$ 11,557,598	\$ 22,012	\$ 11,579,610
		October	\$ 846,655	\$ 21,909	\$ 868,564
		November	\$ -	\$ 8,059	\$ 8,059
		December	\$ -	\$ 18,610	\$ 18,610

Welsh	2020	January	\$ 3,848,226	\$ 37,841	\$ 3,886,067
		February	\$ 3,839,386	\$ 20,971	\$ 3,860,357
		March	\$ 4,441,535	\$ 39,459	\$ 4,480,993
		April	\$ 3,428,747	\$ 96,857	\$ 3,525,604
		May	\$ 7,540,602	\$ 142,792	\$ 7,683,394
		June	\$ 6,889,501	\$ 206,504	\$ 7,096,005
		July	\$ 9,155,523	\$ 126,504	\$ 9,282,027
		August	\$ 10,355,313	\$ 99,227	\$ 10,454,540
		September	\$ 4,219,504	\$ 88,157	\$ 4,307,661
		October	\$ 5,687,708	\$ 243,374	\$ 5,931,082
		November	\$ 9,418,673	\$ 139,947	\$ 9,558,621
		December			\$ -
Flint Creek	2020	January	\$ 1,498,588	\$ 11,574	\$ 1,510,162
		February	\$ 1,529,866	\$ 15,074	\$ 1,544,940
		March	\$ 26,273	\$ 4,849	\$ 31,123
		April	\$ (97,567)	\$ -	\$ (97,567)
		May	\$ 477,051	\$ 118,103	\$ 595,154
		June	\$ 1,767,210	\$ 57,226	\$ 1,824,436
		July	\$ 2,058,653	\$ 39,783	\$ 2,098,436
		August	\$ 2,391,575	\$ 13,851	\$ 2,405,427
		September	\$ 2,081,558	\$ 15,639	\$ 2,097,197
		October	\$ 2,219,054	\$ 40,133	\$ 2,259,187
		November	\$ 1,458,837	\$ 44,554	\$ 1,503,391
		December			\$ -
Turk	2020	January	\$ 4,187,459	\$ 1,197	\$ 4,188,656
		February	\$ 3,858,210	\$ 749	\$ 3,858,958
		March	\$ 4,073,571	\$ 3,886	\$ 4,077,458
		April	\$ 3,037,661	\$ 1,189	\$ 3,038,849
		May	\$ 1,391,974	\$ 35,730	\$ 1,427,704
		June	\$ 3,689,172	\$ 13,989	\$ 3,703,162
		July	\$ 4,792,091	\$ 15,832	\$ 4,807,923
		August	\$ 5,297,737	\$ 14,280	\$ 5,312,017
		September	\$ 4,345,452	\$ (8)	\$ 4,345,445
		October	\$ 3,398,829	\$ 53,255	\$ 3,452,084
		November	\$ 5,489,500	\$ (8,118)	\$ 5,481,382
		December			\$ -
Pirkey	2020	January	\$ 8,093,619	\$ (238,438)	\$ 7,855,182
		February	\$ 9,640,965	\$ 254,968	\$ 9,895,933
		March	\$ 8,628,679	\$ 70,616	\$ 8,699,295
		April	\$ 6,567,000	\$ (59,588)	\$ 6,507,411
		May	\$ 1,545,814	\$ 53,937	\$ 1,599,751
		June	\$ 2,944,900	\$ 18,689	\$ 2,963,589
		July	\$ 15,720,574	\$ 18,516	\$ 15,739,090
		August	\$ 17,118,172	\$ 18,843	\$ 17,137,015
		September	\$ 966,983	\$ 3,701	\$ 970,685
		October	\$ 3,573,922	\$ 14,884	\$ 3,588,806
		November	\$ 16,731,895	\$ 53,335	\$ 16,785,230
		December			\$ -
Dolet Hills	2020	January	\$ -	\$ -	\$ -
		February	\$ -	\$ 2,386	\$ 2,386
		March	\$ -	\$ -	\$ -
		April	\$ -	\$ 2,029	\$ 2,029
		May	\$ (507,082)	\$ (2)	\$ (507,084)
		June	\$ 14,973,462	\$ 17,281	\$ 14,990,743
		July	\$ 3,015,657	\$ 84,906	\$ 3,100,563
		August	\$ 10,618,072	\$ 35,830	\$ 10,653,902
		September	\$ 20,242,021	\$ 31,233	\$ 20,273,255
		October	\$ 13,180,945	\$ 117,059	\$ 13,298,004
		November	\$ -	\$ 140,241	\$ 140,241
		December			\$ -

**SOAH DOCKET NO. 473-21-0538
PUC DOCKET NO. 51415**

**SOUTHWESTERN ELECTRIC POWER COMPANY'S RESPONSE TO SIERRA
CLUB'S FIRST SET OF REQUESTS FOR INFORMATION**

Question No. Sierra Club 1-8:

For each of the Company's coal- or solid-fuel units (Dolet Hills, Flint Creek, Pirkey, Turk, and Welsh), for each of the years 2021 through 2030, please identify the Company's most recent projection of:

- a. Installed Capacity
- b. Unforced Capacity
- c. Capacity factor
- d. Availability
- e. Heat rate
- f. Forced or random outage rate
- g. Fixed O&M cost
- h. Variable O&M cost
- i. Fuel cost

Response No. Sierra Club 1-8:

Please refer to Sierra Club 1-8 Highly Sensitive Attachment 1.

Sierra Club 1-8 HIGHLY SENSITIVE Attachment 1 responsive to this request is HIGHLY SENSITIVE PROTECTED MATERIAL under the terms of the Protective Order. Due to current restrictions associated with COVID-19, this information is being provided electronically and a secure login to access the information will be provided upon request to individuals who have signed the Protective Order Certification.

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Title: Mng Dir Res Plnning&Op Anlysis

Prepared By: Joseph S. Perez

Title: Forecast Analyst Prin

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**SOAH DOCKET NO. 473-21-0538
PUC DOCKET NO. 51415**

**SOUTHWESTERN ELECTRIC POWER COMPANY'S RESPONSE TO SIERRA
CLUB'S FIRST SET OF REQUESTS FOR INFORMATION**

Question No. Sierra Club 1-9:

Refer to the "Flint Creek Power Plant Notice of Intent to Comply With the Site-Specific Alternative to Initiation of Closure CCR Unit – Primary Bottom Ash Pond," submitted to by SWEPCO-AEP to the U.S. EPA on November 30, 2020.

- a. Produce any evaluation(s) that the Company performed to determine that converting Flint Creek to dry ash handling, as opposed to retiring the unit, is in customers' best interest.
- b. State the total cost of the projects the Company intends to undertake at Flint Creek to allow compliance with the CCR Rule and ELG Rule, and of these total costs, please provide the amount that will be apportioned to SWEPCO's Texas, Arkansas, and Louisiana customers, respectively.
- c. Please provide the year that these costs have been or will be incurred.
- d. Please provide a detailed description of each project element.
- e. Please provide all studies, reports, or analyses of alternative compliance options.

Response No. Sierra Club 1-9:

- a. Please see the response for Sierra Club 1-5 for the Flint Creek unit disposition analysis that evaluated installing the necessary CCR and ELG retrofits versus retiring the unit.
- b. Please see Sierra Club 1-9 Attachment 1 for SWEPCO's share of the CCR/ELG compliance costs. SWEPCO has not apportioned these costs to their Texas, Arkansas and Louisiana customers.
- c. See the response to b.
- d. The following is a description of the Flint Creek project elements:
 - Dry Ash Handling Systems
 - Removal of the current bottom ash hoppers, crushers, and jet pumps
 - Installation of new UBDC and associated equipment to collect and dewater bottom ash, economizer ash, and pyrites from the unit.
 - Installation of dry flight conveyors to transport economizer ash from the economizer hoppers on the unit to the UBDC.
 - Rerouting the wet pyrite sluicing system to the UBDC.
 - Installation of a new concrete ash bunker to collect and temporarily store CCR material from the UBDC.
 - Installation of a sump at the new ash bunker to collect contact stormwater or excess quench water and return to UBDC.
 - CCR material from ash bunker will be either sold for beneficial reuse or hauled to onsite landfill for disposal.

- Pond Closure by Removal and construction of new Coal Pile Runoff Pond (CPRP)
 - Serpentine diversion channel will be installed within the current PBAP footprint to allow for CCR wastestreams to be rerouted to facilitate the CCR material removal and pond closure and repurposing steps below.
 - CCR material from the PBAP to be removed via mechanical excavation and dredging. All CCR material will either be sold for beneficial reuse or hauled to the onsite landfill for disposal.
 - Following the removal of CCR material, the existing PBAP will be repurposed as the Wastewater Pond (WWP) and will receive low volume wastewater and coal pile runoff flows from the plant along with stormwater runoff from the surrounding area. The WWP will continue to discharge to the Clearwater Pond (a non-CCR unit) before ultimately discharging to SWEPCO Lake through NPDES Outfall #101.
 - Installation of a Coal Pile Runoff Pond at east end of the coal pile storage area and north of the rail line.
 - A tank-based chemical treatment system will be designed and installed to treat the influent to the Wastewater Pond and Coal Pile Runoff Ponds as needed to ensure compliance with plant discharge requirements.
- e. Please see the response to a.

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Sponsored By: Monte A. McMahon

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	SWEPCo Share Flint Creek CCR/ELG Cost <u>(\$000)</u>
2021	12,573
2022	9,779
<u>2023</u>	<u>4,441</u>
Total	26,793

**SOAH DOCKET NO. 473-21-0538
PUC DOCKET NO. 51415**

**SOUTHWESTERN ELECTRIC POWER COMPANY'S RESPONSE TO SIERRA CLUB'S
SECOND SET OF REQUESTS FOR INFORMATION**

Question No. SC 2-2:

Refer to SWEPCO's response to Sierra Club 1-5, Attachment 6 and the CCR and ELG retrofits analysis.

- a. Indicate which modeling software was used to conduct the analysis.
- b. Provide all workbooks, with formulas intact, used to develop the results shown in Attachment 6.
- c. Provide a list of all capital expenditures associated with CCR and ELG compliance included in each of the six modeled scenarios for each unit and provide the cost of each.
- d. Provide the following forecasts utilized for this analysis:
 - i. EIA commodity price forecasts (with and without CO2 price)
 - ii. SPP market price forecasts (with and without CO2 price)
 - iii. CO2 price forecasts
- e. Explain why the Company used the EIA commodity price forecasts instead of AEP's own forecasts.
- f. Provide each the following inputs for each unit, both new and existing, modeled at the highest level of granularity used in conducting the retrofit analysis:
 - i. Coal price (\$/MMBtu)
 - ii. Natural Gas price (\$/MMBtu)
 - iii. Heat rate for each unit (Btu)
 - iv. Capital expenditures (\$)
 - v. Variable Operation and Maintenance (\$/MWh)
 - vi. Fixed Operation and Maintenance (\$/MW)
- g. For each replacement resource available to the model, provide each of the following inputs for each resource at the highest level of granularity used in conducting the retrofit analysis:
 - i. Replacement resource options
 - ii. Replacement resource size (MW)
 - iii. Year replacement resource is available (year)
 - iv. Cost of replacement resource option (\$/MW)
 - v. Annual capacity factor
- h. Provide the following outputs by unit:
 - i. Annual generation (MWh)
 - ii. Fuel costs (\$)
 - iii. VOM costs (\$)
 - iv. FOM costs (\$)
 - v. Capital expenditures for ELG and CCR environmental compliance (\$)
 - vi. Other capital expenditures (\$)
 - vii. Energy and ancillary market revenues (\$)

- i. Explain the End Effects assumptions and methodology used.
- j. Provide the discount rate used.

Response No. SC 2-2:

- a. The modeling software used to conduct the CCR/ELG retrofit analysis was Plexos developed by Energy Exemplar.
- b. Please see SC 2-2 HS Attachments 1 through 11 for the workbooks used to develop the results shown in SC 1-5 Attachment 6.
- c. Please see SC 2-2 HS Attachment 12 for all capital expenditures associated with CCR and ELG compliance included in each of the six modeled scenarios for each unit and provide the cost of each.
- d. Please see the supplemental response to CARD 2-10 for the commodity prices forecasts used in the analysis.
- e. The EIA's Annual Energy Outlook (AEO) is a widely recognized, readily accessible and fee-free resource for long-term energy market projections. It is also well understood that the AEO is based upon the assumption regulations remain unchanged and long-term energy projections lack certain RTO-level granularity. As such, AEPSC utilized the Aurora energy market simulation model to produce the Companies' EIA-Based Fundamentals Forecast based upon EIA inputs to serve as a reference point against which ratepayer benefits may be compared and assessed.
- f. Please see SC 2-2 HS Attachment 13 for new and existing unit information used in the analysis.
- g. Please see SC 1-8 and SC 2-2 HS Attachment 14 for replacement resource inputs used in the analysis.
- h. Please see SC 1-8 for Generation, VOM, and FO&M. See also SC 2-2 HS Attachment 15 for outputs by unit from the analysis.
- i. The End-Effects period takes into account the costs of those new resource additions after the end of the planning period. The infinite end-effects period was selected to allow the model to capture the long-run costs of resource additions made near the end of the Planning Period.
- j. The discount rate used in the analysis was 6.98%

The attachments responsive to this request are HIGHLY SENSITIVE MATERIAL under the terms of the Protective Order. Due to current restrictions associated with COVID-19, this information is being provided electronically and a secure login to access the information will be provided upon request to individuals who have signed the Protective Order Certification.

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Title: Forecast Analyst Prin

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Title: VP Generating Assets SWEPCO

**SOAH DOCKET NO. 473-21-0538
PUC DOCKET NO. 51415**

**SOUTHWESTERN ELECTRIC POWER COMPANY'S RESPONSE TO SIERRA
CLUB'S SECOND SET OF REQUESTS FOR INFORMATION**

Question No. SC 2-3:

Refer to SWEPCO response to Sierra Club 1-9(d) regarding the description of the projects that the Company intends to undertake and the costs that will be incurred to comply with ELG and CCR requirements for the Flint Creek coal unit. For each step or item described under the Dry Ash Handling System and the Pond Closure by Removal and construction of new Coal Pile Runoff Pond projects, indicate the following:

- a. Whether the step or item is required if the plant retires prior to October 17, 2028.
- b. Whether the step or item is required if the plant retires prior to December 31, 2028.
- c. The cost of each step or item.

Response No. SC 2-3:

a. - b. The first three bulleted items in SC 1-9 (d) under "Pond Closure by Removal of new Coal Pile Runoff Pond (CPRP)" are required whether Flint Creek retires prior to October 17, 2028 or prior to December 31, 2028. The remaining items are tied to compliance with ELG and CCR requirements impacting operation of the unit beyond these time frames and would not be required.

c. The Company does not maintain project estimates at the bulleted item level provided in its response to SC 1-9 part d. The following reflects the cost estimates maintained by the Company, for the project elements provided by the Company in SC 1-9 part d:

- Dry Ash Handling Systems: \$26.7 million
- Pond Closure by Removal and construction of new Coal Pile Runoff Pond: \$26.8 million
 - Pond Closure: \$17.6 million
 - Pond Repurpose: \$9.2 million

Prepared By: Tara D. Beske

Title: Regulatory Consultant Staff

Sponsored By: Monte A. McMahon

Title: VP Generating Assets SWEPCO

**SOAH DOCKET NO. 473-21-0538
PUC DOCKET NO. 51415**

**SOUTHWESTERN ELECTRIC POWER COMPANY'S RESPONSE TO SIERRA
CLUB'S SECOND SET OF REQUESTS FOR INFORMATION**

Question No. SC 2-6:

For each of the Company's solid-fuel units (Dolet Hills, Flint Creek, Pirkey, Turk, and Welsh), provide the following information about future planned capital expenditures.

- a. Provide a forecast of annual capital expenditures for each generation unit over the next ten years.
- b. Provide a specific accounting of all projects and capital expenditures already scheduled or planned at SWEPCO's solid fuel units (coal and lignite) over the next ten years.

Response No. SC 2-6:

a. See Sierra Club 2-6 Highly Sensitive Attachment 1 for a 10-year capital forecast of capital expenditures by plant. Forecasts are not maintained at the unit level.

b. See Sierra Club 2-6 Highly Sensitive Attachment 2 for a 10-year forecast of capital expenditures by project.

Company budget forecasts are updated annually. The capital forecast included in Highly Sensitive Confidential Attachments 1 and 2 does not reflect the Company's announcement to retire the Dolet Hills and Pirkey Plants in 2021 and 2023, respectively, or that the Welsh Plant will cease using coal in 2028.

The attachments responsive to this request are HIGHLY SENSITIVE MATERIAL under the terms of the Protective Order. Due to current restrictions associated with COVID-19, this information is being provided electronically and a secure login to access the information will be provided upon request to individuals who have signed the Protective Order Certification.

Prepared By: Tara D. Beske

Title: Regulatory Consultant Staff

Sponsored By: Monte A. McMahon

Title: VP Generating Assets SWEPCO

**SOAH DOCKET NO. 473-21-0538
PUC DOCKET NO. 51415**

**SOUTHWESTERN ELECTRIC POWER COMPANY'S RESPONSE TO SIERRA
CLUB'S SECOND SET OF REQUESTS FOR INFORMATION**

Question No. SC 2-13:

Provide total energy and ancillary service market revenues by plant for each of SWEPCO's solid fuel units (coal and lignite) for the period 2015 – 2020. Indicate whether the values represent SWEPCO's share or total unit.

Response No. SC 2-13:

Please see Sierra Club 2-13 HIGHLY SENSITIVE Attachment 1 for the requested information. Data prior to May 2015 is not archived and thus is not available.

The attachment responsive to this request is HIGHLY SENSITIVE MATERIAL under the terms of the Protective Order. Due to current restrictions associated with COVID-19, this information is being provided electronically and a secure login to access the information will be provided upon request to individuals who have signed the Protective Order Certification.

Prepared By: Scott E. Mertz

Title: Regulatory Consultant Staff

Sponsored By: Scott E. Mertz

Title: Regulatory Consultant Staff

**SOAH DOCKET NO. 473-21-0538
PUC DOCKET NO. 51415**

**SOUTHWESTERN ELECTRIC POWER COMPANY'S RESPONSE TO SIERRA
CLUB'S SECOND SET OF REQUESTS FOR INFORMATION**

Question No. SC 2-17:

Refer to Schedule H-5.3b at pages 4-7.

- a. Please explain whether (and what portion of) the identified ELG or CCR costs at Flint Creek could be avoided by a commitment to cease burning coal under the CCR Rule's alternative closure provisions, 40 C.F.R. § 257.103, or the ELG Rule, 40 C.F.R. § 423.19(f).
- b. Has SWEPCO conducted any economic or technical alternatives analysis (including any retirement versus retrofit analysis) for the Company's CCR or ELG compliance costs at its coal-burning units? If yes, please provide all such analyses, including all supporting calculations, data, documents, technical or economic reports or presentations, modeling input and output files, and workpapers associated with each such analysis. If the Company did not conduct any such analyses, explain why.
- c. Please provide the CCR and ELG project cost and schedule for each of SWEPCO's coal plants, including a detailed summary of the actual cost for completed phases of the projects, the date of completion, and all anticipated remaining costs and spend dates.
- d. At any time after EPA issued its proposed revised ELG Rule in November 2019, 84 Fed. Reg. 64,620, or after its final rule, 85 Fed. Reg. 64,650, did SWEPCO conduct any further economic, technical, or alternatives analysis (including any retirement analysis) for the Company's ELG costs referenced in Schedule H-5.3b at pages 4-7. If yes, please provide all such analyses, including all supporting calculations, data, documents, technical or economic reports or presentations. If not, please explain why.
- e. At any time after EPA issued its proposed revised CCR Rule in December 2019, 84 Fed. Reg. 65,941, or after its final rule, 85 Fed. Reg. 53,516, did SWEPCO conduct any further economic, technical, or alternatives analysis (including any retirement analysis) for the Company's CCR costs referenced in Schedule H-5.3b at pages 4-7. If yes, please provide all such analyses, including all supporting calculations, data, documents, technical or economic reports or presentations. If not, please explain why.

Response No. SC 2-17:

- a. See Attachments 1 and 2 provided in the Company's response to part c of this question, for costs labeled "CCR/ELG". It is that portion of future costs that would not be required, if before October 2021, the Company declared its intention to retire Flint Creek by the end of 2028.

- b. Please see the supplemental response to CARD 2-10 for the Company's CCR/ELG analysis of Welsh 1&3, Pirkey and Flint Creek.
- c. See Sierra Club 2-17 Attachments 1, 2, and 3, for a detailed summary of the historical and forecasted SWEPCO share of the cost for each phase of the CCR and ELG projects, which include direct and indirect capital install costs, capital removal, and AFUDC. Also included are the CCR/ELG project estimated completion dates by phase.
- d. Please see the response to SC 2-17 b.
- e. Please see the response to SC 2-17 b.

Prepared By: Mark A. Becker

Title: Mng Dir Res Plnning&Op Anlysis

Prepared By: Tara D. Beske

Title: Regulatory Consultant Staff

Sponsored By: Brian Bond

Title: VP External Affairs

Sponsored By: Monte A. McMahon

Title: VP Generating Assets SWEPCO

SWEPCO CCR/ELG Project Annual Costs¹²³						
	< 2020	2021	2022	2023	2024 >	Total
Flint Creek - 50%	\$ 1,986,963	\$ 7,883,347	\$ 13,000,145	\$ 3,210,858		\$ 26,081,313
Direct Cost						\$ 20,228,821
CCR/ELG	\$ 1,258,823	\$ 2,814,563	\$ 7,629,123	\$ 1,373,896		\$ 13,076,404
Pond Closure-Primary Bottom Ash Pond	\$ 149,091	\$ 3,442,701	\$ 2,504,912	\$ 1,055,712		\$ 7,152,416
Indirect Cost						\$ 5,852,493
CCR/ELG	\$ 558,295	\$ 832,807	\$ 2,293,578	\$ 537,697		\$ 4,222,376
Pond Closure-Primary Bottom Ash Pond	\$ 20,755	\$ 793,276	\$ 572,534	\$ 243,553		\$ 1,630,117
Welsh - 100%	\$ 3,662,482	\$ 3,424,341	\$ 3,120,146	\$ -	\$ 11,082,181	\$ 21,289,149
Direct Cost						\$ 16,917,015
CCR/ELG	\$ 2,128,015	Project Cancelled				\$ 2,128,015
Pond Closure-Primary Bottom Ash Pond	\$ 471,000	\$ 253,000	\$ -	\$ -	\$ 8,940,000	\$ 9,664,000
Pond Closure-Bottom Ash Storage Pond	\$ -	\$ 2,562,500	\$ 2,562,500	\$ -	\$ -	\$ 5,125,000
Indirect Cost						\$ 4,372,134
CCR/ELG	\$ 992,817	Project Cancelled				\$ 992,817
Pond Closure-Primary Bottom Ash Pond	\$ 70,650	\$ 51,195	\$ -	\$ -	\$ 2,142,181	\$ 2,264,026
Pond Closure-Bottom Ash Storage Pond	\$ -	\$ 557,646	\$ 557,646	\$ -	\$ -	\$ 1,115,291
Pirkey - 85.96%	\$ 2,155,441	\$ 308,499	\$ 514,926	\$ 1,730,452		\$ 4,709,319
Direct Cost						\$ 4,140,343
CCR/ELG	\$ 1,994,610	Project Cancelled				\$ 1,994,610
Pond Closure-Bottom Ash Ponds	\$ 71,519	\$ 227,794	\$ 415,187	\$ 1,431,234		\$ 2,145,734
Indirect Cost						\$ 568,975
CCR/ELG	\$ 73,846	Project Cancelled				\$ 73,846
Pond Closure-Bottom Ash Ponds	\$ 15,467	\$ 80,705	\$ 99,739	\$ 299,218		\$ 495,130

¹Includes SWEPCO share of direct and indirect capital install costs, capital removal, and AFUDC.²Welsh and Pirkey CCR/ELG cost transferred to O&M expense³As of January 31, 2021.

SWEPCO CCR/ELG Project Stage Costs ¹²³							
	Stage 0-2		Stage 3-4		Stage 5-7		Total
	Actual	Estimate To Complete	Actual	Estimate To Complete	Actual	Estimate To Complete	
Flint Creek - 50%							\$ 26,081,313
Direct Cost							\$ 20,228,821
CCR/ELG	\$ 1,242,707		\$ 145,369	\$ 2,941,440		\$ 8,746,888	\$ 13,076,404
Pond Closure-Primary Bottom Ash Pond	\$ 73,260		\$ 100,123	\$ 143,747		\$ 6,835,287	\$ 7,152,416
Indirect Cost							\$ 5,852,493
CCR/ELG	\$ 473,076		\$ 85,219	\$ 832,807		\$ 2,831,275	\$ 4,222,376
Pond Closure-Primary Bottom Ash Pond	\$ 10,377		\$ 15,566	\$ 788,087		\$ 816,086	\$ 1,630,117
Welsh - 100%							\$ 21,289,149
Direct Cost							\$ 16,917,015
CCR/ELG	\$ 2,128,015	Project Cancelled					\$ 2,128,015
Pond Closure-Primary Bottom Ash Pond	\$ 471,000		\$ 129,463	\$ 123,537		\$ 8,940,000	\$ 9,664,000
Pond Closure-Bottom Ash Storage Pond	\$ -			\$ 750,000		\$ 4,375,000	\$ 5,125,000
Indirect Cost							\$ 4,372,134
CCR/ELG	\$ 992,817	Project Cancelled					\$ 992,817
Pond Closure-Primary Bottom Ash Pond	\$ 70,650		\$ 21,917	\$ 29,278		\$ 2,142,181	\$ 2,264,026
Pond Closure-Bottom Ash Storage Pond	\$ -			\$ 177,750		\$ 937,541	\$ 1,115,291
Pirkey - 85.96%							\$ 4,709,319
Direct Cost							\$ 4,140,343
CCR/ELG	\$ 1,994,610	Project Cancelled					\$ 1,994,610
Pond Closure-Bottom Ash Ponds	\$ 71,519			\$ 361,032		\$ 1,713,183	\$ 2,145,734
Indirect Cost							\$ 568,975
CCR/ELG	\$ 73,846	Project Cancelled					\$ 73,846
Pond Closure-Bottom Ash Ponds	\$ 15,467			\$ 80,705		\$ 398,958	\$ 495,130

¹Includes SWEPCO share of direct and indirect capital install costs, capital removal, and AFUDC.

²Welsh and Pirkey CCR/ELG cost transferred to O&M expense.

³As of January 31, 2021.

SWEPCO CCR/ELG Project Stage ¹²³ Completion Dates						
	Stage 0-2		Stage 3-4		Stage 5-7	
	Actual	Schedule	Actual	Schedule	Actual	Schedule
Flint Creek						
CCR/ELG	12/1/2020			1/1/2022		2/28/2023
Pond Closure-Primary Bottom Ash Pond	8/1/2020			4/1/2021		2/28/2023
Welsh						
CCR/ELG	12/1/2020		Project Cancelled			
Pond Closure-Primary Bottom Ash Pond		3/1/2021		2/1/2027		10/17/2028
Pond Closure-Bottom Ash Storage Pond				6/1/2021		10/1/2022
Pirkey						
CCR/ELG	12/1/2020		Project Cancelled			
Pond Closure-Bottom Ash Ponds	8/1/2020			4/1/2021		10/17/2023

¹Stage 0-2: Study to Conceptual Design²Stage 3-4: Preliminary & Detail Engineering and Design³Stage 5-7: Construction, Commissioning, Start Up, and Close Out

**SOAH DOCKET NO. 473-21-0538
PUC DOCKET NO. 51415**

**SOUTHWESTERN ELECTRIC POWER COMPANY'S RESPONSE TO SIERRA
CLUB'S THIRD SET OF REQUESTS FOR INFORMATION**

Question No. Sierra Club 3-2:

Refer to SWEPCO response to Sierra Club 1-5, Highly Sensitive Attachment 6.

- a. For each unit, indicate whether the units were modeled with an economic or a selfcommitment status for each year of the analysis. If not exclusively one or the other, state how unit commitment was modeled.
- b. Indicate the date the study was conducted.
- c. Indicate the regulation or rationale behind each of the retirement date assumption listed.
- d. Indicate the date used in this analysis, by which ELG compliance must be achieved.
- e. Indicate the date used in this analysis, by which CCR compliance must be achieved.
- f. For all scenarios indicate whether CCR compliance costs, ELG compliance costs, or both ELG and CCR costs were included or excluded.

Response No. Sierra Club 3-2:

- a. The units were assumed to be economically committed and dispatched in the modeling to produce the unit information found in SC 1-5 Highly Sensitive Attachment 6.
- b. Please see the response to SC 3-3 a. for the date the study was conducted.
- c. The rationale behind the retirement date assumptions is compliance with the CCR and/or ELG rules.
- d. Achieving CCR compliance at each facility listed below is dependent on future operations of the plant (cease or continue burning coal) and need for alternative disposal capacity at the plant when the CCR impoundment ceases operation. The CCR rule allows the plant to continue operating the CCR impoundment until October 15, 2023 while additional disposal capacity is provided. Flint Creek Plant will be providing additional disposal capacity and then will close the Primary Bottom Ash Pond (BAP) per the date shown below. The CCR rule also allows a plant that commits to cease burning coal to continue operating the CCR impoundments as long as the plant ceases burning coal and the CCR impoundments are closed by October 17, 2023 (plants with impoundments less than 40 acres - Pirkey) or October 17, 2028 (for impoundments 40 acres and greater - Welsh). The dates provided are based on the current individual CCR impoundment plan that was submitted to EPA for approval on November 30, 2020. The current plans are ultimately dependent on EPA approval, with the exception of the Welsh Bottom Ash Storage Pond (BASP) which will cease operation no later than April 11, 2021.

- Welsh BASP - Cease Operation and Initiate Closure by April 11, 2021
- Welsh Primary Bottom Ash Pond (BAP) – Cease Burning Coal and Complete Closure by October 17, 2028

- Flint Creek Primary BAP- Complete Closure by February 28, 2023
 - Pirkey East BAP- Complete Closure by January 2023
 - Pirkey West BAP- Complete Closure by October 17, 2023
- e. All plants must comply by a date to be established in each facility's National Pollutant Discharge Elimination System (NPDES) wastewater permit. The latest possible date allowed under the current ELG rule is December 31, 2025. However, an option is available in the rule to allow the plant to cease combustion of coal (i.e., retire or repower) and to continue to operate without further ELG-related retrofits until no later than December 31, 2028. We have filed permit requests to reflect site-specific dates under this revised framework that became effective in December 2020.
- The current permit for Flint Creek is based on the prior ELG rule and contains a date of December 31, 2023. We have filed a request to indicate the date should be revised to November 30, 2022.
 - The current permit for Welsh similarly contains a date of December 31, 2023 based on the prior rule. We have filed a request to modify the permit to reflect that the facility will permanently cease coal combustion on or before December 31, 2028, and therefore no technology retrofits are required.
 - The current permit for Pirkey contains no relevant date, but is in the renewal process with the state agency. We have filed information that the facility will permanently cease coal combustion on or before October 17, 2023, and therefore no technology retrofits are required.
- f. In the CCR+ELG Expenditure scenario both CCR and ELG compliance costs were included. In the No CCR Expenditure scenario, no CCR or ELG compliance costs were not included. In the CCR Expenditure scenario, only CCR compliance costs were included.

Prepared By: Mark A. Becker

Title: Mng Dir Res Plnning&Op Anlysis

Sponsored By: Thomas P. Brice

Title: VP Regulatory & Finance

Sponsored By: Monte A. McMahon

Title: VP Generating Assets SWEPCO

**SOAH DOCKET NO. 473-21-0538
PUC DOCKET NO. 51415**

**SOUTHWESTERN ELECTRIC POWER COMPANY'S RESPONSE TO SIERRA
CLUB'S FOURTH SET OF REQUESTS FOR INFORMATION**

Question No. Sierra Club 4-1:

Refer to SWEPCO response to Sierra Club 1-5, Highly Sensitive Attachment 6.

- a. Indicate the date counsel requested the SWEPCO Unit Disposition Analysis.
- b. Please define and provide a brief explanation of the following the following terms as used in the spreadsheet:
 - i. CPW
 - ii. Planning Period
 - iii. End-Effects
- c. Describe each of the specific planning periods, and explain why each planning period was selected for study.
- d. For each of the portfolios listed in Column A,
 - i. Please provide an itemized list and explanation of the costs and anticipated schedule of expenditures included in each scenario.
 - ii. For each portfolio listed in Column A, what costs for environmental compliance are included in the "no CCR expenditure" for the specified unit in each scenario?
 - iii. Do the "no CCR expenditure" portfolios for each unit assume ELG and CCR expenditures at all other units?
 - iv. Do the "no CCR expenditure" portfolios for each unit assume no ELG expenditures at that unit?
- e. Did SWEPCO run any scenarios that included no expenditures on ELG and CCR compliance at more than one unit in a given scenario? If yes, please indicate if various combinations of "no expenditure" at different units were included and what those combinations were.
- f. Why did the analysis not include a baseline scenario of no CCR and no ELG expenditures at all units?
- g. For the EIA Commodity Price Forecast with Carbon Pricing, what year did SWEPCO assume carbon pricing to begin? What carbon pricing is being used in the analysis?
- h. State in narrative form why the Flint Creek expenditure appears to be more favorable when a carbon price is assumed for one of the planning periods studied.
- i. For each of the retirement date assumptions, please state the reasoning for the three specific dates chosen.
- j. Why did SWEPCO assume a March 2028 retirement for the "no CCR expenditure" assumption at Flint Creek?

Response No. Sierra Club 4-1:

- a. Counsel requested the SWEPCO Unit Disposition Analysis on February 21, 2020.
- b.
 - i. CPW is the acronym for Cumulative Present Worth which takes a series of future costs and present values them to the present day costs.
 - ii. The Planning Period is the period of time that the Plexos model develops the optimal plan (i.e. lowest cost mix) of new resource additions. The Planning Period for this analysis was selected to be long enough for the model to determine the year over year impacts of resources added in the optimal plan.
 - iii. Please see SC 2-2 for a description of the End-Effects period.
- c. Please see the response to b. ii and iii.
- d.
 - i. Please see the response to SC 2-2 c. for a list of all CCR and ELG related costs assumed in each scenario.
 - ii. Please see the response to SC 2-2 c. for the environmental compliance costs assumed in the No CCR Expenditure scenarios.
 - iii. In the No CCR Expenditure profiles for a specific unit, CCR and ELG expenditures are assumed to be spent at the other units
 - iv. No ELG expenditures are assumed at a unit in the No CCR Expenditure scenarios.
- e. No. The economic analysis that supported the decision to retire Pirkey, Welsh 1 and Welsh 3 and Flint Creek's continued operation were performed on a individual basis.
- f. The baseline scenario where CCR and ELG expenditures were made at all units was selected to measure the economic impact of not making those expenditures at specific units. Only one baseline scenario was needed to determine those economic impacts and there was no need for a second baseline scenario.
- g. Please see the response to SC 2-2 d. for the year carbon pricing was assumed to begin and the carbon pricing assumed in the EIA Commodity Price Forecast with Carbon Pricing.
- h. The reason why making the Flint Creek CCR and ELG expenditures is more favorable under the EIA with Carbon Pricing scenario than the EIA without Carbon Pricing scenario is due to differences in capacity expansion plans between those two carbon pricing scenarios.
- i. The CCR+ELG Expenditure retirement date assumes that the units will run through the end of their operating life. The No CCR Expenditure retirement date is determined by when the units need to cease operations to allow the existing ponds to be remediated prior to the ELG compliance date. The CCR Expenditure retirement date is determined by the ELG compliance date.
- j. Please see the response to i.

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Title: Mng Dir Res Plnning&Op Anlysis

Sponsored By: Thomas P. Brice

Title: VP Regulatory & Finance

**SOAH DOCKET NO. 473-21-0538
PUC DOCKET NO. 51415**

**SOUTHWESTERN ELECTRIC POWER COMPANY'S RESPONSE TO SIERRA
CLUB'S FIFTH SET OF REQUESTS FOR INFORMATION**

Question No. SC 5-2:

Regarding the option to convert Welsh to operate on natural gas.

- a. Indicate the outage length necessary to complete the conversion.
- b. State the date on which the Company expects to begin construction on the conversion.
- c. Provide the date by which a conversion to natural gas will be completed. If the Company is considering multiple time frames, provide all potential completion dates.
- d. Provide summer and winter capacity of the unit after its conversion to run on natural gas.
- e. Provide the total cost of the conversion.
- f. Provide an annual breakdown of costs that will be incurred by ratepayers.

Indicate how SWEPCO plans to recover the cost of the conversion (i.e., through which docket or rate mechanism).

Response No. SC 5-2:

SWEPCO has conducted only a conceptual review of the conversion of the Welsh units to operate on natural gas. SWEPCO has not fully scoped the project nor consulted an Engineering, Procurement, and Construction contractor. Therefore the responses below are preliminary.

- a. It could take approximately 12 weeks or more to convert the Welsh unit to a gas fired facility.
- b. The Company is continuing to evaluate the Welsh gas conversion. At this time, there is no expected construction start date for the Welsh gas conversion.
- c. Please see the response to b.
- d. The winter and summer capacity of the Welsh gas conversion would be 525 MW.
- e. The total capital cost of the Welsh gas conversion would be approximately \$32 million.
- f. The analysis of the annual breakdown of gas conversion costs to the customer has not been performed.
- g. Because SWEPCO has not decided to undertake the conversion, SWEPCO has not developed a cost recovery plan. However, if a conversion is undertaken, the capital investment would be eligible for recovery in base rates.

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Title: Mng Dir Res Plnning&Op Anlysis

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Title: VP Generating Assets SWEPCO

**SOAH DOCKET NO. 473-21-0538
PUC DOCKET NO. 51415**

**SOUTHWESTERN ELECTRIC POWER COMPANY'S SUPPLEMENTAL RESPONSE
TO CITIES ADVOCATING REASONABLE DEREGULATION'S
FIRST SET OF REQUESTS FOR INFORMATION**

Question No. CARD 1-16:

Provide annual capital expenditures at each SWEPCO power plant for each of the last four calendar years, the test year, and as requested in rates for the first time in this case.

Response No. CARD 1-16:

See Schedule H 5-3.b, for the information requested.

Supplemental Response CARD 1-16:

For Schedule H-5.3b expenditures broken down by those requested for the first time in rates and the test year period, please see CARD 1-16 Supplemental Attachments 1 and 2.xlsx.

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Sponsored By: Monte A. McMahon

Title: VP Generating Assets SWEPCO

SOUTHWESTERN ELECTRIC POWER COMPANY
Fossil Capital Expenditures - Test Year

Location	Project Description	Apr 2019-Mar 2020
1320 Central Maint Facility SWEPCO	WSX114593 Tooling Contingency New Tools O	335,814.6400
1320 Central Maint Facility SWEPCO Total		335,814.6400
168 SWEPCO Generation	000005264 SEPCo-G Capital Software Dev	8,011,150.3600
	000017845 Alliance RCM Cap Blkt	13,925.6200
	000021554 SWEPCO DHLC/Pirkey Land Acq	580,394.2600
	000025252 2018 Gen Plt Cap Blkt - SEP-G	407,787.8000
	IT1681421 Maximo Imp - SEP - G	2,610,644.3200
	IT168BILL Corp Prgrm Billing - SWEPCO Ge	1,205,653.7200
	REOSWE003 Mobile Test Equipment-SWEGEN	(953.9200)
168 SWEPCO Generation Total		12,828,602.1600
Arsenal Hill Plant	000012163 J.L.Stall @ Arsenal Hill Const	4,957.2400
	ARS5BATTY STATION BATTERY #5	50,481.1700
	ARS5MSHGR Replace U5 Steam Line Hanger	704.1200
	ARS5MVALV PROVIDE PLATFORMS FOR MISC ARE	2,949.3200
	ARS6ABELV Replace elevator control sys	264,177.2100
	ARS6ABT3K Unit 6 Siemens HMI	208,833.5400
	ARS6AHREJ ARS 6A HRSG EXP JOINT	72,749.4400
	ARS6ASCRR Stall U6A SCR Catalyst Replace	752,547.2900
	ARS6B555A 6B Main Steam Non Return Valve	16,153.3400
	ARS6BHREJ ARS 6B HRSG EXP JOINT	75,547.1400
	ARS6BSCRR Stall U6B SCR Catalyst Replace	757,194.8100
	ARS6DEMMB ARS STALL DEMIN MIXED BED	28,046.2200
	ARS6GSUSP STALL SPARE GSU / 6S & 6 AB	1,000,264.1500
	ARS6HOIST ARS STALL UNIT MONORAILS	16,045.2600
	ARS6HVACR STALL AIR CONDITIONING UNIT	43,632.8900
	ARS6OUTCP Stall Outage Capital	158,746.0100
	ARS6STMAJ STEAM TURBINE MAJOR - 6	2,408,292.0500
	ARS6TOOLC ARS6 TOOLS OVER 1K	41,207.8800
	ARSBAYOU1 Stall-Bayou Bank Stabilization	1,391,472.6700
	ARSOUTPPB ARS OUTAGE	34,280.2700
	ARSREOICE REO Ice Machine	5,270.6500
	ARSSRISSU ARS Capital Storeroom Issues	4,469.1900

SOUTHWESTERN ELECTRIC POWER COMPANY
Fossil Capital Expenditures - Test Year

Location	Project Description	Apr 2019-Mar 2020
	REOSWE008 HVAC Replacement REO	65,315.0900
Arsenal Hill Plant Total		7,403,336.9500
Dolet Hills Plant	DLHCI0033 Construct New Landfill Cell	28,695.1300
	DLHCI0042 DH Rpl Boiler Duct, Insulation	13,043.7800
	DLHCI0043 DHPS-Upgrade Air Heaters	2,769.3000
	DLHCI0044 Rpl Boiler Furnace Lwr Tubing	(169.6300)
	WSX111023 Dolet Hills-Ppb Other Producti	1,460,529.2100
Dolet Hills Plant Total		1,504,867.7900
Flint Creek Plant	000013017 FLC Expansion Joint Replace	463.3100
	000013154 FLC Replace Conveyor Belts	102,474.6200
	000013169 FLC Small Tools Coal Yard	9,384.4200
	000013666 FLC Instrumentation Upgrades	66,155.1500
	000013705 FLC Small Tools Misc	152,402.3400
	000013708 FLC Install New Platform	45,365.7300
	000020379 FLC U1 DBA Conver (CCR/ELG)	401,395.9700
	000021701 FC U1 NOx Mods	(12,425.1000)
	FC001LFEX Flint Creek LF Lateral Exp	1,482.5000
	FLCFGDFAN ID Fan Labor	128,887.5200
	FLCSTATOR FLC Spare Stator Bars	974,388.3500
	FLCU10025 FLC Dumper PLC Upgrade	28,096.1100
	FLCU10156 FLC U1C 4-kV Switchgear Repl	(150.0000)
	FLCU10245 Pump Replacement	55,378.2000
	FLCU10247 FLCU1 Generator Stator Rewind	241,620.5700
	FLCU10261 Misc Valve Replacement	1,182.3000
	FLCU10330 Replace Misc BOP Valves	7,878.0700
	FLCU10417 Yokogawa Probe and Analyzers	2,234.3500
	FLCU10420 Replace Capacitor Bank Swgear	377,945.1900
	FLCU10424 NERC Compliance DDR Req.	238.7500
	FLCU10442 Replace Motor Pump City Lake	10,245.3200
	FLCU10454 Replace Generator Bushings & C	(43.4600)
	FLCU10458 Repl Tripper & Coal Belt Contr	20,208.3500
	FLCU10463 Crowder Family Land Purchase	804.2400

SOUTHWESTERN ELECTRIC POWER COMPANY
Fossil Capital Expenditures - Test Year

Location	Project Description	Apr 2019-Mar 2020
	FLCU10469 Replace C Pulv Rotating Seg	84,050.6300
	FLCU10472 PULV REPLACE ROLL WHEEL ASSE	129,515.8000
	FLCU10481 HU Diff Relay Replacement	49,449.7300
	FLCU10482 Rep 1k Sootblower 54 12 & 4	13,201.8100
	FLCU10483 Purchase AC VFD for Maint Bldg	(216.5200)
	FLCU10485 Replace NID Recycle Rotary Fee	8,025.0800
	FLCU10486 Primary BA Pond Oil Boom	2,685.1900
	FLCU10489 MOTOR REWINDS	7,820.2500
	FLCU10491 Replace Demin Work Stations	37,756.2000
	FLCU10493 Replace Reheat Attemper Nozzle	9,805.7000
	FLCU10497 Replace ISO Valves NID Cooler	5,298.4700
	FLCU10519 CH 1C Main Feed to Dumper	57,798.3600
	FLCU10520 DISCHARGE CHECK VALVE	1,219.8400
	FLCU10521 Replace Bags in Ash Silo Bagho	11,295.1700
	FLCU10523 Replace 1CH1 Breaker	4,879.6600
	FLCU10528 Replace "B2" Flyash crossover	4,875.5400
	FLCU10529 Replace J- Duct Exhauster	7,489.7700
	FLCU10530 Purchase Motors Over 10H	12,432.1800
	FLCU10531 REPL CONTROLS BUNKER DUST	5,953.0100
	FLCU10534 Pulv Swing Gate Switch and Sol	195,250.5700
	FLCU10535 Pump Replacement	6,235.8900
	FLCU10538 C GSU Cooling Pumps and Valves	121,967.8800
	FLCU10540 Repl "A" Lime Transport Blower	9,409.6800
	FLCU10546 DCS Controls Switch Upgrade	7,689.8600
	FLCU10548 CSP Pumps	31,821.0100
	FLCU10553 Replace Pinion Gear At Dumper	2,919.1000
Flint Creek Plant Total		3,444,242.6600
Knox Lee Plant	ARCFLA168 Arc Flash Protectn Swi SWEPCO	1,133.8500
	KXL0CM001 Small Tools and Misc Equipment	103,575.5100
	KXL0CM006 KXL U0 Replace Oil Booms	164.3200
	KXL0CM025 KXL U0 Admin Offices	783,694.1500
	KXL0CW007 Replace Chlorinator Skid	116,912.6700

SOUTHWESTERN ELECTRIC POWER COMPANY
Fossil Capital Expenditures - Test Year

Location	Project Description	Apr 2019-Mar 2020
	KXL0CW008 KXL U0 Reverse Osmosis System	125,114.2200
	KXL5CB003 KXL U5 Boiler Gas Header Vlvs	305,754.1700
	KXL5CB009 KXL U5 Boiler Lighting	(128.8500)
	KXL5CB010 KXL U5 Replace Air Compressor	96,975.8200
	KXL5CD008 KXL U5 Annunciator Controls	11,535.3900
	KXL5CD009 KXL5 AMMONIA INJECTION SYSTEM	92,564.1500
	KXL5CE003 KXL U5 NERC Relays Replacement	10,711.4100
	KXL5CE007 KXL5 U5 RELAY	6,147.4400
	KXL5CG004 Replace Generator Leads U5	176,925.1300
	KXL5CH002 KXL U5 Air Heater Seals Rpl	190,118.5300
	KXL5CM004 KXL U5 Expansion Joint Upgrade	97,021.8700
	KXL5CM014 KXL U5 TDL Laser Analyzer	197,160.7900
	KXL5CM021 KXL 5 USED Oil Storage Tank	8,878.7300
	KXL5CV004 KXL U5 SW Piping	73,314.1100
	KXL5CW001 KXL U5 Service Water Pump	2,926.5000
	KXL5CW002 KXL U5 Boiler Silica Analyzer	14,884.1900
	NRCPSWPCO NERC CIP SWEPCO	4,682.7500
	SWE168RTU SWEPCO Gen RTU Upgrade	3,880.6400
Knox Lee Plant Total		2,423,947.4900
Lieberman Plant	LBM0CCOOL Turbine Lube Oil Cooler	303,847.2500
	LBM0CCTFL Comp. Turbine Floor Lighting	55,208.3800
	LBM0CG202 Water Treatment Building	9,127.2700
	LBM0CGATE Entrance Gate Replacement	12,942.0000
	LBM0CM101 U0 Valve Replacement/Upgrades	295,448.8100
	LBM0CM104 U0 Small Tools & MiscEquipment	31,446.4500
	LBM0CN100 U0 CATHODIC PROTECTION	(3,725.7500)
	LBM0CT200 Replacement of Transformer	329,983.6000
	LBM0CT201 Lighting Transformer	24,652.2900
	LBM0CTTRAN Replacement of Transmitters	6,055.1900
	LBM3CPIRB U3 Pilot Igniter Rebuild	127,851.3700
	LBM3CPUMP U3 Boiler Chemical Pump	147.1100
	LBM4CHTWL Upgrading Hot Well Controls	845.2100

SOUTHWESTERN ELECTRIC POWER COMPANY
Fossil Capital Expenditures - Test Year

Location	Project Description	Apr 2019-Mar 2020
	LBM4CPIRB U4 Pilot Igniter Rebuild	30,177.3400
	LBMALARM Alarm System	23,029.8900
Lieberman Plant Total		1,247,036.4100
Lone Star Plant	LNS000611 Capital PPB - Misc Project	(46,036.4800)
Lone Star Plant Total		(46,036.4800)
Mattison Plant	000014768 TON Plant Improvements	31,295.1800
	HDMU00002 HDM Small Tools	3,544.9700
	HDMU00074 Construct Maintenance Building	177,815.4700
	HDMU00075 Purchase Capital Tools	13,759.7500
	HDMU00076 GE Stationary Blade Replace	473,407.0100
	HDMU40012 Set of CT Transition Pieces	619,310.1400
Mattison Plant Total		1,319,132.5200
Pirkey Plant	000026191 PRK CCR/ELG Compliance	1,814,669.5500
	PRK10C220 CY CONVEYOR BELTS	67,593.9100
	PRK10C251 PULV GRINDING TABLES BOWL	204,331.2700
	PRK10C302 Boiler Duct Exp Joints	56,084.0400
	PRK12C704 PRK Controls BMS CC	5,365,607.3920
	PRK13C600 Precip Rappers	21,730.3800
	PRK14C810 ASH ECON ASH	10,211.8300
	PRK18C001 CAP OUTAGE < \$100K	(1,516.6600)
	PRK18C002 CAP NON-OUTAGE <\$100K	11,648.0700
	PRK19C001 CAP OUTAGE < \$100k	737,138.0300
	PRK19C002 CAP NON-OUTAGE < \$100K	902,368.6500
	PRK20C002 CAP NON-OUTAGE <\$100K	116,874.7600
	PRKCAHT61 PAH SUPPORT/GUIDE BEARING	91,088.9000
	PRKCBLR60 BOILER HEADER INSULATION	45,149.7500
	PRKCCNT01 RVP CONTROL CARDS	10,673.8700
	PRKCCNV02 CONVEYOR PULLEY REPLACEMENT	19,690.2200
	PRKCCYD03 A1 OR A2 RING GRANULATOR REBU	35,585.0100
	PRKCDEM00 Demin Analyzers	37,033.5800
	PRKCFDR01 STOCK FEEDER BELTS	3,978.4400
	PRKCFGD51 FGD Valves Recycle	31,994.8100

SOUTHWESTERN ELECTRIC POWER COMPANY
Fossil Capital Expenditures - Test Year

Location	Project Description	Apr 2019-Mar 2020
	PRKCFGD60 FGD CONTROLS UPGRADE	3,778,091.2300
	PRKCRLY01 RELAYS FOR DME	170,040.7400
	PRKCSFD01 STOCK FEEDER BELTS	9,062.2500
	PRKCSLG02 A FILTER CAKE VACUUM DRUM REPL	(35,187.9500)
	PRKCWTR02 POND EVAPORATOR INSTALL	623,694.8700
	PRKPSC223 R/R 2019	100,114.9000
	PRKXENV01 Pirkey Landfill Area K Cell 1	1,034,077.1700
	PRKXENV03 PRK Landfill Expansion	61,808.3500
	PRKXFAN50 ID Fan Blades B	495,673.4600
	PRKXGEN51 CI VOLTAGE REGULATOR	137,768.8900
Pirkey Plant Total		15,957,079.7120
Turk Plant	TRKAPEXBU TRK MATS REDUNDANT APEX BACKUP	101,972.0900
	TRKBAYLIT TRK TURBINE HI BAY LIGHTS	29,707.2300
	TRKBLRHVA TRK HVAC BOILER SAMPLE ROOM	6,038.3600
	TRKC2BELT TRK CONVEYOR 2 BELT REPLACEMEN	115,763.5300
	TRKC5BELT TRK CONVEYOR 5 BELT REPLACEMEN	89,912.7200
	TRKCANNON TRK SCR AIR CANNONS	30,272.0000
	TRKCOALYD TRK MISC COAL EQUIP	4,452.1600
	TRKCOGLTK TRK WWTP COAGULANT STRG TANK	9,461.4100
	TRKCVBELT TRK COAL CONV BELT REPLACEMENT	85,530.3500
	TRKCYCRIC TRK CY RECLAIM TUNNEL CRICKETS	667,702.9000
	TRKCYELEV TRK COAL YARD ELEVATOR CRUSHER	42,331.7200
	TRKFLAHR TRK RAS FLUIDIZING AIR HEATER	6,812.9100
	TRKFURNTR TRK OFFICE FURNITURE	3,638.6300
	TRKGAITON TRK GAITRONICS SYSTEM	10,323.5400
	TRKGENPLF TRK GENERAL PLATFORMS	90,684.5500
	TRKGENUPS TRK PLANT UPS UPGRADES	3,126.4900
	TRKHEATTR TRK WT HEAT TRACE INST CONTROL	163.3300
	TRKHVACCN TRK HVAC CONTROL SYS FOR ADMIN	45,392.3600
	TRKIDFNCL TRK #1 ID FAN LUBE OIL COOLER	13,881.9900
	TRKMOTORS TRK MISC MOTORS	36,023.1200
	TRKMOWR19 TRK NEW EXMARK MOWER ZEROTURN	8,761.7500

SOUTHWESTERN ELECTRIC POWER COMPANY
Fossil Capital Expenditures - Test Year

Location	Project Description	Apr 2019-Mar 2020
	TRKMSCPPB TRK MISC PPB PROJECTS	374,962.2500
	TRKPLGRZO TRK PLVR GRINDING ZONE REPLACE	199,171.5900
	TRKPLTRAN TRK PLANT TRANSMITTERS	50,750.7800
	TRKPRESBL TRK PRESSURE BLOWER 1 N 1CP	899.6200
	TRKPULVER TRK PULVERIZER WHEEL REPLAC	2,493.2500
	TRKPUMPSO TRK MISC PUMPS	13,910.5400
	TRKRAILR2 Turk Rail Replacement	4,171,468.6400
	TRKRCDAC1 TRK CY RCD AC UNIT	10,290.2000
	TRKSAFETY TRK SAFETY ENHANCEMENTS	2,725.3600
	TRKSBCONT TRK SOOTBLWR HYDROJET CONTROLS	3,984.5800
	TRKSCRHR1 TRK SCR ACOUSTIC CLNR 1 & 2 LY	61,733.0800
	TRKSLKHTR TRK LIME SLAKER 1 HTR RECTFR	7,044.9800
	TRKTOOLS0 TRK TOOLS MISC	163,819.9300
	TRKTRBAVR TRK MAIN & BFP TRB AVR CONT UP	351,008.1800
	TRKUPGRAD TRK MISC UPGRADES	4,176.7600
	TRKVALVES TRK PPB MISC VALVES	37,500.5000
	TRKVDDR0 TRK CONST ELEV VARI AC DRIVES	812.3400
Turk Plant Total		6,858,705.7200
Welsh Plant	000020364 WSH U0 DBA Conversion	937,832.7300
	WSHCU0003 WSH U0 Parts Sox Under 50K	58,791.9300
	WSHCU0009 WSH U0 Ultra Filter Membranes	169,760.9800
	WSHCU0019 WSH U0 Coal Car Dumper Replace	40,379.4700
	WSHCU0024 WSH U0 Small Tools	311,068.1600
	WSHCU0025 WSH U0 RO Membrane	7,604.1500
	WSHCU0042 WSH U0 COAL YARD 4KV FEED JH	426,348.9700
	WSHCU0102 WSH U0 COAL YARD CONVEYOR BELT	194.9600
	WSHCU0103 WSH U0 COAL YARD MOTORS	114,314.0300
	WSHCU0104 WSH U0 COAL YARD GEARBOXES	5,345.7400
	WSHCU0106 WSH U0 CAPITAL INSTRUMENTATION	2,503.3500
	WSHCU0107 WSH U0 PUMP REPLACE/OVERHAUL	87,298.2600
	WSHCU0108 WSH U0 CAPITAL MOTOR REWINDS	486.2200
	WSHCU0114 WSH U0 CONVEYOR CONTROL SYSTEM	1,673.4600

SOUTHWESTERN ELECTRIC POWER COMPANY
Fossil Capital Expenditures - Test Year

Location	Project Description	Apr 2019-Mar 2020
	WSHCU0117 WSH U0 TRIPPER CONTROLS	170,251.4700
	WSHCU0120 WSH U0 ASH POND LAND ACQUISTIO	4,552.1800
	WSHCU1003 WSH U1 Parts Sox Under 50K	410,635.5000
	WSHCU1004 WSH U1 Replace Clinker Grinder	(32,211.2800)
	WSHCU1005 WSH U1 Pulv Cmpnt Changeout	331,100.1200
	WSHCU1007 WSH U1 CSP Contractor Labor	89,620.1900
	WSHCU1028 WSH U1 Capital Motor Rewinds	38,426.6300
	WSHCU1029 WSH U1 Valve Replacement	321,353.1700
	WSHCU1030 WSH U1 Platforms	112,745.8500
	WSHCU1053 WSH U1 Pump Rep/Cap Overhaul	291,125.2600
	WSHCU1107 WSH U1 CAPITAL INSTRUMENTATION	4,313.3900
	WSHCU1108 WSH U1 SEL 487E RELAY/COMPUTER	1,957.8100
	WSHCU1110 WSH U1 BYPRODUCT DRY UNLOADING	6,197.2700
	WSHCU1113 U1 FABRIC FILTER OPACITY MONIT	126,081.6200
	WSHCU3003 WSH U3 Parts Sox Under 50K	77,406.9200
	WSHCU3005 WSH U3 Pulv Cmpnt Changeout	539,458.2000
	WSHCU3007 WSH U3 CSP Contractor Labor	26,861.2300
	WSHCU3028 WSH U3 Capital Motor Rewinds	46,293.0800
	WSHCU3029 WSH U3 Valve Replacement	66,594.0200
	WSHCU3030 WSH U3 Platforms	26,359.3600
	WSHCU3049 WSH U3 Expansion Joints Boiler	40,601.6900
	WSHCU3053 WSH U3 Pump Rep/Cap Overhaul	280,969.6900
	WSHCU3110 WSH U3 CAPITAL INSTRUMENTATION	7,300.4200
	WSHCU3111 BYPRODUCT DRY UNLOADING SYS	4,883.5800
	WSHCU3113 U3 FABRIC FILTER OPACITY MONIT	163,155.0600
	WWSHPPBNB WSH Capital Non-Budgeted	1,528,757.5500
Welsh Plant Total		6,848,392.3900
Wilkes Plant	WLKC00004 Miscellaneous Tools and Equip	197,598.1400
	WLKC00105 PLATFORMS	(505.4800)
	WLKC00106 WLK CATHODIC PROT NAT GAS LINE	10,668.0700
	WLKC00111 U0 WILKES PI SERVERS INSTALL	4,506.5600
	WLKC00114 REPL TRANSFORMER AT LODGE	(64.5100)

SOUTHWESTERN ELECTRIC POWER COMPANY
Fossil Capital Expenditures - Test Year

Location	Project Description	Apr 2019-Mar 2020
	WLKC00115 U0 INTRASITE COMMUNICATION INS	56.9700
	WLKC00116 REPLACE LODGE FLOOR	(1,943.1800)
	WLKC00117 U0 DEMIN RESIN REPLACEMENT	24,290.1100
	WLKC00118 U0 PAVE PLANT ROAD ENTRANCE	92,323.4400
	WLKC00119 REPLACE ALL CABIN WINDOWS	18,802.2100
	WLKC10048 U1 HYDROGEN SUPPLY SYS REPL	76,262.5000
	WLKC10051 U1 INSTALL HYDROGEN SAMPLE PAN	(163.5100)
	WLKC10052 U1 REPL HYDROGEN PANEL ANNUNCI	9,985.0700
	WLKC10053 U1 REPLACE CEMS EQUIPMENT	63,798.8700
	WLKC10054 U1 REPLACE BLACKSTART BATTERY	4,366.3000
	WLKC20003 U2 Retube B FW Htr	129,262.0900
	WLKC20052 U2 REPL HYDROGEN PANEL ANNUNCI	908.2700
	WLKC20053 U2 REPLACE CEMS EQUIPMENT	11,124.7500
	WLKC30043 U3 RETAINING RING REPLACEMENT	428,767.6500
	WLKC30045 U3 INSTALL HYDROGEN SAMPLE PAN	301.2400
	WLKC30046 U3 REPL HYDROGEN PANEL ANNUNCI	1,536.8400
	WLKC30047 U3 REPLACE CEMS EQUIPMENT	11,447.0100
	WLKC30052 U3 COMB TEMP VAL CTRL CABINETS	15,874.4800
	WLKC30053 U3 MDBFP MOTOR ROTOR REBAR/REW	120,029.4800
	WLKCI3012 U3 TURBINE VIBRATION SYS RPL	160,089.3100
	WLKCI3019 U3 TURBINE CONTROLS	1,388,235.8400
Wilkes Plant Total		2,767,558.5200

**SOAH DOCKET NO. 473-21-0538
PUC DOCKET NO. 51415**

**SOUTHWESTERN ELECTRIC POWER COMPANY'S SUPPLEMENTAL RESPONSE
TO CITIES ADVOCATING REASONABLE DEREGULATION'S SECOND SET OF
REQUESTS FOR INFORMATION**

Question No. CARD 2-10:

Please provide SWEPCO's most recent studies evaluating the economic viability of continued operations of each Company owned generating unit, and supporting scheduled retirement dates of such units, along with underlying commodity price and operating cost assumptions.

Response:

Please see the workpaper entitled "Brice WP - Pgs from Filed App and Testimony - 10.6.20," which SWEPCO submitted with the native files provided with its rate-filing package for Dolet Hills.

Please see CARD 2-10 Attachment 1 for Pirkey.

Supplemental Response No. CARD 2-10:

Please see CARD 2-10 Supplemental HIGHLY Sensitive Attachment 1 for the most recent study evaluating the economic viability of the continued operations of Flint Creek, Welsh 1 &3 and Pirkey, and their operating costs. Please see CARD 2-10 Supplemental Attachment 2 and Attachment 3 for the commodity price forecasts used in the most recent analysis of those units. Please see the response to SC 1-5 for the most recent study evaluating the economic viability of the continued operation of Dolet Hills, and the operating costs of the unit. Please see CARD 2-10 Supplemental Attachment 4 and Attachment 5 for the commodity price forecast used in the most recent economic viability analysis of Dolet Hills. Attachments 2 – 5 are provided electronically on the PUC Interchange.

CARD 2-10 Supplemental HIGHLY SENSITIVE Attachment 1 responsive to this request is HIGHLY SENSITIVE PROTECTED MATERIAL under the terms of the Protective Order. Due to current restrictions associated with COVID-19, this information is being provided electronically and a secure login to access the information will be provided upon request to individuals who have signed the Protective Order Certification.

Prepared By: Mark A. Becker

Title: Mng Dir Res Plnning&Op Anlysis

Sponsored By: Thomas P. Brice

Title: VP Regulatory & Finance

SOAH DOCKET NO. 473-21-0538
PUC DOCKET NO. 51415
Direct Testimony of Devi Glick, Exhibit DG-4

Exhibit DG-4

**SWEPCO Responses to Requests for Information,
Highly Sensitive Confidential**

Data Request	File Type
SWEPCO Response to Sierra Club 1-5, HS Attachment 6	Excel
SWEPCO Response to Sierra Club 1-8, HS Attachment 1	PDF
SWEPCO Response to Sierra Club 2-2, HS Attachments 1 through 14	Excel
SWEPCO Response to Sierra Club 2-6, HS Attachment 1	PDF
SWEPCO Response to Sierra Club 2-6, HS Attachment 2	PDF
SWEPCO Response to Sierra Club 2-13, HS Attachment 1	Excel
SWEPCO Response to Sierra Club 3-1, HS Attachment 4	PDF

*CONFIDENTIAL Excel files were submitted via CD to the Commission pursuant to TAC § 22.71(d).