

*Cities Advocating Reasonable Deregulation*

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		<u>Hrs/Rate</u>	<u>Amount</u>
10/29/20	Brennan Foley - Review application, direct testimony and supporting schedules and conduct relevant research re: payroll and incentive compensation	1.70 350.00/hr	595.00
	Sergio E. Herrera - Communicated with ARH & S. Norwood RE: SWEPCO's cont'd issue with CARD 1-13	0.50 250.00/hr	125.00
	Sergio E. Herrera - Reviewed McMahon direct testimony RE: SWEPCO issue with CARD 1-13	1.10 250.00/hr	275.00
	Sergio E. Herrera - Communicated with SWEPCO Counsel RE: CARD 1-13	0.70 250.00/hr	175.00
10/30/20	Mariann Wood - Reviewed filings on PUC Interchange and updated case file; Updated discovery spreadsheet	0.40 145.00/hr	58.00
	Brennan Foley - Review application, direct testimony and supporting schedules and conduct relevant research re: SPP and generation issues	1.60 350.00/hr	560.00
	Sergio E. Herrera - Communicated with SWEPCO Counsel RE pending objection to CARD 1-13	0.20 250.00/hr	50.00
10/31/20	Mariann Wood - Reviewed filings on PUC Interchange and updated case file; Updated discovery spreadsheet	0.40 145.00/hr	58.00
<b>Total Legal Fees:</b>		<b>97.80</b>	<b>\$37,735.50</b>
<b>Expenses :</b>			
10/01/20	Research on Westlaw for the month of October 2020		40.30
	Consultant Invoice - ReSolved Energy Consulting Inv #4683		864.00
	Consultant Invoice - Norwood Energy Consulting, LLC Inv #SWPRate Oct20		5,390.00
<b>Total expenses:</b>			<b>\$6,294.30</b>

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Amount

**TOTAL AMOUNT OF THIS BILL:**

**\$44,029.80**

**BALANCE DUE**

**\$44,029.80**

**WESTLAW Research**

**October 2020**

<b>Account #</b>	<b>Research Time</b>	<b>X \$65.00/hr.</b>	<b>+ Excluded Charges</b>	<b>Total</b>
		X \$65.00		
		X \$65.00		
		X \$65.00		
		X \$65.00		
<b>806</b>	<b>0.62</b>	<b>X \$65.00</b>		<b>\$40.30</b>

**ReSolved Energy Consulting, LLC**

11044 Research Blvd, A-420

Austin, TX 78759

**Invoice**

DATE	INVOICE NUMBER
11/3/2020	4683

**BILL TO**

Herrera Law &amp; Associates, PLLC

Alfred Herrera

4400 Medical Parkway

Austin, Texas 78756

**PROJECT**

HL SWEP CO RC 51415

DESCRIPTION	HOURS	RATE	AMOUNT
Consulting (Nalepa)	3.2	270.00	864.00
Work Completed thru - October 31, 2020		<b>TOTAL DUE</b>	<b>\$864.00</b>

## Monthly Recap

Karl Nalepa

Date	Task	Hours
October 16, 2020	Download rate filing application.	0.50
October 19, 2020	Review application.	1.20
October 20, 2020	Review application.	1.50
		3.20

***Norwood Energy Consulting, L.L.C.***

P. O. Box 30197  
Austin, Texas 78755-3197  
scott@scottnorwood.com  
(512) 297-1889

Mr. Alfred R. Herrera  
Herrera Law & Associates, PLLC  
4400 Medical Parkway  
Austin, Texas 78756

Date: 11-10-20  
Tax ID #: 26-2374359  
Invoice#: SWP Rate OCT20

Re: SWEPCO Base Rate Case Analysis - PUC Docket No. 51415

806 ✓

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Statement for professional services rendered 10-1-20 through 10-31-20 ✓

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10-22-20	Reviewed SWEPCO testimony; worked on RFIs	7.0 hrs
10-23-20	Reviewed SWEPCO testimony and prior orders; drafted RFIs	6.5 hrs
10-28-20	Reviewed SWEPCO testimony on Dolet Hills issues	5.0 hrs
10-29-20	Reviewed SWEPCO testimony on plant operations and expenses	<u>6.0 hrs</u>

Total hours: 24.5 hrs

Total due: 24.5 hours at \$220 per hour = \$5,390 ✓

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Thank you for the opportunity to assist with this project.

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December 8, 2020

Cities Advocating Reasonable Deregulation  
c/o Jim Finley  
City of Longview  
P.O. Box 1952  
Longview, Texas 75606-1952

**Re: PUC Docket No. 51415; *Application of Southwestern Electric Power Company for Authority to Change Rates*  
Account # 806**

Dear Jim:

Enclosed is our invoice for services provided to the Cities Advocating Reasonable Deregulation regarding the above referenced matter through November, 2020.

Please forward a copy of this invoice to the company.

If I can provide any further explanation about the services provided for you, please call me at (512) 474-1492.

Sincerely,

A handwritten signature in black ink, appearing to read 'ARH', with a stylized flourish at the end.

Alfred R. Herrera

ARH:ll  
Enclosure

**Herrera Law & Associates, PLLC**  
**4400 Medical Parkway**  
**Austin, TX 78756**  
**512-474-1492**

**December 11, 2020**

*Invoice submitted to:*

**Cities Advocating Reasonable Deregulation**

**c/o Jim Finley**

**City of Longview**

**P.O. Box 1952**

**Longview, TX 75606-1952**

*In Reference To:*

*Application of Southwestern  
Electric Power Company for  
Authority to Change Rates  
PUC DN 51415  
Acct #806*

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**STATEMENT FOR PROFESSIONAL SERVICES**

**Legal Fees:**

		<u>Hrs/Rate</u>	<u>Amount</u>
11/02/20	Brennan Foley - Review and assess SWEPCO's objections to CARD RFI 1-13 re: environmental compliance costs	0.30 350.00/hr	105.00
	Brennan Foley - Review OPUC RFIs	0.10 350.00/hr	35.00
11/04/20	Mariann Wood - Reviewed filings on PUC Interchange and updated case file; Updated discovery spreadsheet	0.60 145.00/hr	87.00
	Sergio E. Herrera - Reviewed SWEPCO's application RE compliance issues	1.10 250.00/hr	275.00



*Cities Advocating Reasonable Deregulation*

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		<u>Hrs/Rate</u>	<u>Amount</u>
11/04/20	Sergio E. Herrera - Drafted Motion to Compel RE CARD 1-13	3.80 250.00/hr	950.00
11/05/20	Alfred R. Herrera - Various communications w/CARD cities re: suspension resolution	1.80 485.00/hr	873.00
	Alfred R. Herrera - Review ROR/ROE testimony & ID areas/issues for discovery	2.80 485.00/hr	1,358.00
	Mariann Wood - Reviewed filings on PUC Interchange and updated case file; Updated discovery spreadsheet	0.20 145.00/hr	29.00
	Sergio E. Herrera - Continued drafting MTC RE CARD 1-13	2.70 250.00/hr	675.00
11/06/20	Alfred R. Herrera - Continue review ROR/ROE testimony & ID areas/issues for discovery	2.30 485.00/hr	1,115.50
	Alfred R. Herrera - Various communications w/CARD cities re: resolution to intervene for non-orig. jurisdiction cities	1.20 485.00/hr	582.00
	Brennan Foley - Review/revise motion to compel response to RFI 1-13	0.80 350.00/hr	280.00
	Brennan Foley - Review application, direct testimony and supporting schedules and conduct relevant research re: self-insurance (0.6) and rate design (1.0)	1.60 350.00/hr	560.00
	Sergio E. Herrera - Reviewed and edited MTC RE CARD 1-13	1.00 250.00/hr	250.00
11/07/20	Mariann Wood - Reviewed filings on PUC Interchange and updated case file; Updated discovery spreadsheet	1.10 145.00/hr	159.50
11/09/20	Brennan Foley - Review and revise proposed procedural schedule	0.80 350.00/hr	280.00

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		<u>Hrs/Rate</u>	<u>Amount</u>
11/09/20	Leslie Lindsey - Prepare, format, file and serve on all parties Motion to Compel response CARD RFI 1-13 to SWEPCO	0.50 145.00/hr	72.50
	Sergio E. Herrera - Finalized edits RE MTC before filing	0.30 250.00/hr	75.00
	Sergio E. Herrera - Reviewed SWEPCO application RE pending list of issues	1.80 250.00/hr	450.00
11/10/20	Brennan Foley - Draft list of issues	1.90 350.00/hr	665.00
	Brennan Foley - Review SWEPCO's amended notice and Staff recommendation on notice	0.30 350.00/hr	105.00
	Brennan Foley - Review responses to TIEC RFIs re: generation	0.20 350.00/hr	70.00
	Brennan Foley - Review OPUC RFIs re: incentive compensation and affiliates costs	0.20 350.00/hr	70.00
	Brennan Foley - Review cost of capital schedules and correspond with E. D'Ambrosio and R. Woolridge re: schedule errors	0.40 350.00/hr	140.00
	Mariann Wood - Reviewed filings on PUC Interchange and updated case file; Updated discovery spreadsheet	0.50 145.00/hr	72.50
	Sergio E. Herrera - Reviewed TIEC's Proposed procedural schedule	0.80 250.00/hr	200.00
11/11/20	Alfred R. Herrera - Review and revise CARD's list of issues	0.80 485.00/hr	388.00
	Brennan Foley - Review parties' edits to proposed procedural schedule and correspond with A. Herrera and S. Herrera re: same	0.20 350.00/hr	70.00
	Brennan Foley - Review cost of capital schedules and correspond with R. Woolridge re: errors in schedules	1.00 350.00/hr	350.00

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		<u>Hrs/Rate</u>	<u>Amount</u>
11/11/20	Brennan Foley - Revise list of issues	0.40 350.00/hr	140.00
	Mariann Wood - Reviewed filings on PUC Interchange and updated case file	0.10 145.00/hr	14.50
	Sergio E. Herrera - Communicated with SWEPCO Counsel RE CARD RFI 1-21	0.30 250.00/hr	75.00
	Sergio E. Herrera - Reviewed CARD RFIs and Communicated w/ S. Norwood RE Clarification	0.90 250.00/hr	225.00
	Sergio E. Herrera - Drafted comparison of CARD's proposed schedule w/ TIEC and SWEPCOs	1.30 250.00/hr	325.00
11/12/20	Brennan Foley - Review cost of capital schedules and correspond with R. Woolridge re: errors in schedules	0.20 350.00/hr	70.00
	Brennan Foley - Review Sierra Club, TIEC and OPUC RFIs re: generation (0.2) and taxes (0.1)	0.30 350.00/hr	105.00
	Brennan Foley - Review parties' edits to proposed procedural schedule	0.20 350.00/hr	70.00
	Brennan Foley - Review objections to TIEC RFIs	0.20 350.00/hr	70.00
	Mariann Wood - Reviewed filings on PUC Interchange and updated case file; Updated discovery spreadsheet	0.80 145.00/hr	116.00
	Leslie Lindsey - Prepare, format, file and serve on all parties CARD's List of Issues; Emails with L.Hogrewe regarding Confidential RFIs from Sierra Club	0.50 145.00/hr	72.50
	Leslie Lindsey - Prepare additional protective order certs for filing	0.20 145.00/hr	29.00

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		<u>Hrs/Rate</u>	<u>Amount</u>
11/12/20	Sergio E. Herrera - Reviewed SWEPCO's List of Issues	0.50 250.00/hr	125.00
	Sergio E. Herrera - Communicated with SWEPCO Counsel RE CARD RFIs	0.30 250.00/hr	75.00
	Sergio E. Herrera - Drafted notes RE: SWEPCO RFI Question	0.90 250.00/hr	225.00
	Sergio E. Herrera - Communicated with ARH RE SWEPCO's question	0.50 250.00/hr	125.00
	Sergio E. Herrera - Communicated with Intervenor's RE Procedural Schedule	0.30 250.00/hr	75.00
	Sergio E. Herrera - Reviewed Staff's proposed edits to procedural schedule	0.60 250.00/hr	150.00
	Sergio E. Herrera - Communicated with Intervenor's RE Procedural Schedule reflecting Staff's edits	0.30 250.00/hr	75.00
11/13/20	Alfred R. Herrera - Prepare for and attend PHC	2.60 485.00/hr	1,261.00
	Brennan Foley - Review parties' lists of issues	0.40 350.00/hr	140.00
	Brennan Foley - Review responses to CARD RFIs re: generation	1.00 350.00/hr	350.00
	Mariann Wood - Reviewed filings on PUC Interchange and updated case file; Updated discovery spreadsheet	0.40 145.00/hr	58.00
	Leslie Lindsey - Prepare, format, file and serve on all parties CARD's Protective Order Certifications	0.40 145.00/hr	58.00
	Sergio E. Herrera - Prepared for PHC via Zoom	0.80 250.00/hr	200.00

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		<u>Hrs/Rate</u>	<u>Amount</u>
11/13/20	Sergio E. Herrera - Attended PHC via Zoom	0.60 250.00/hr	150.00
	Sergio E. Herrera - Communicated with ARH RE PHC	0.40 250.00/hr	100.00
	Sergio E. Herrera - Held zoom call with Intervenor RE PHC and Schedule	0.50 250.00/hr	125.00
	Sergio E. Herrera - Reviewed finalized proposed intervenor schedule	0.20 250.00/hr	50.00
11/14/20	Mariann Wood - Reviewed and updated case file; Download HS/CONF Application and RFI Responses; Updated discovery spreadsheet	1.50 145.00/hr	217.50
11/16/20	Brennan Foley - Review responses to RFIs re: generation (0.3), RCEs (0.1), cost allocation and rate design (0.2), and storm reserve (0.1)	0.70 350.00/hr	245.00
	Leslie Lindsey - Prepare format, file and serve on all parties CARD's additional Protective Order Certifications	0.30 145.00/hr	43.50
	Sergio E. Herrera - Reviewed revised intervenor schedule reflecting SWEPCO edits	0.40 250.00/hr	100.00
11/17/20	Brennan Foley - Review parties' proposed changes to procedural schedule	0.20 350.00/hr	70.00
	Brennan Foley - Review responses to RFIs re: generation (0.7); transmission and distribution assets (0.2) and vegetation management (0.5)	1.40 350.00/hr	490.00
	Brennan Foley - Review and assess SWEPCO's response to CARD's motion to compel response to CARD RFI 1-13	0.20 350.00/hr	70.00
	Mariann Wood - Reviewed and updated case file; Updated discovery spreadsheet	1.90 145.00/hr	275.50

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		<u>Hrs/Rate</u>	<u>Amount</u>
11/17/20	Sergio E. Herrera - Reviewed SWEPCO's response to intervenor proposed schedule	0.30 250.00/hr	75.00
	Sergio E. Herrera - Reviewed updated agreed to schedule	0.40 250.00/hr	100.00
11/18/20	Alfred R. Herrera - Review RFI responses - various topics	3.20 485.00/hr	1,552.00
	Alfred R. Herrera - Review RFI responses - various topics	4.10 485.00/hr	1,988.50
	Brennan Foley - Review application, direct testimony and supporting schedules and conduct relevant research re: taxes (1.5) and affiliates expenses (1.5)	3.00 350.00/hr	1,050.00
	Sergio E. Herrera - Reviewed updated agreed to schedule and agreed to motion	0.40 250.00/hr	100.00
11/19/20	Mariann Wood - Reviewed and updated case file	0.40 145.00/hr	58.00
	Leslie Lindsey - Formatted CARD 4th Set of RFIs sent to attorneys for editing	0.30 145.00/hr	43.50
	Sergio E. Herrera - Reviewed SWEPCO's application/testimony RE CA/RD	3.10 250.00/hr	775.00
11/20/20	Brennan Foley - Prepare RFIs re: accounting issues and	0.50 350.00/hr	175.00
	Leslie Lindsey - Prepare, format, file and serve on all parties CARD's 4th Set of RFIs to SWEPCO	0.30 145.00/hr	43.50
11/22/20	Mariann Wood - Reviewed and updated case file	0.10 145.00/hr	14.50

*Cities Advocating Reasonable Deregulation*

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		<u>Hrs/Rate</u>	<u>Amount</u>
11/23/20	Brennan Foley - Review application, direct testimony and supporting schedules and conduct relevant research re: incentive compensation	1.50 350.00/hr	525.00
11/24/20	Brennan Foley - Review application, direct testimony and supporting schedules and conduct relevant research re: affiliates (0.8); generation (0.5); self-insurance (0.8); and cost allocation and rate design (1.0)	3.10 350.00/hr	1,085.00
	Brennan Foley - Review OPUC and Staff RFIs re: incentive compensation (0.1) and self-insurance (0.1) and cost of capital (0.1)	0.30 350.00/hr	105.00
	Brennan Foley - Review responses to RFIs re: incentive compensation (0.2) and generation (0.2)	0.40 350.00/hr	140.00
	Brennan Foley - Review SWEPCO's supplemental RCE report	0.20 350.00/hr	70.00
	Mariann Wood - Reviewed and updated case file; Updated discovery spreadsheet	0.60 145.00/hr	87.00
11/25/20	Mariann Wood - Reviewed and updated case file	0.30 145.00/hr	43.50
11/29/20	Mariann Wood - Reviewed and updated case file Updated discovery spreadsheet	3.50 145.00/hr	507.50
11/30/20	Alfred R. Herrera - Review prior PUCT rulings re: battery storage re: rate treatment	3.20 485.00/hr	1,552.00
	Mariann Wood - Reviewed and updated case file Updated discovery spreadsheet	1.00 145.00/hr	145.00
<b>Total Legal Fees:</b>		<b>84.00</b>	<b>\$26,742.50</b>

*Cities Advocating Reasonable Deregulation*

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**Expenses :**

	<u>Amount</u>
11/01/20    Research on Westlaw for the month of November 2020	42.25
Consultant Invoice - ReSolved Energy Consulting, LLC Inv #4693	3,537.00
Consultant Invoice - Garrett Group Consulting, Inc.	6,400.00
Consultant Invoice - Norwood Energy Consulting, LLC Inv #SWPRate Nov 20	5,500.00
Consultant Invoice - Resolve Utility Consulting Inv #000354	5,450.00
<b>Total expenses:</b>	<b>\$20,929.25</b>
<b>TOTAL AMOUNT OF THIS BILL:</b>	<b>\$47,671.75</b>
<b>Previous balance</b>	<b>\$44,029.80</b>
<b>BALANCE DUE</b>	<b>\$91,701.55</b>



**WESTLAW Research**

**November 2020**

<b>Account #</b>	<b>Research Time</b>	<b>X \$65.00/hr.</b>	<b>+ Excluded Charges</b>	<b>Total</b>
████	████	X \$65.00		████
████	████	X \$65.00		████
████	████	X \$65.00		████
806	0.65	X \$65.00		\$42.25

**ReSolved Energy Consulting, LLC**

11044 Research Blvd, A-420

Austin, TX 78759

**Invoice**

DATE	INVOICE NUMBER
12/2/2020	4693

**BILL TO**

Herrera Law &amp; Associates, PLLC

Alfred Herrera

4400 Medical Parkway

Austin, Texas 78756



PROJECT			
HL SWEPCO RC 51415			
DESCRIPTION	HOURS	RATE	AMOUNT
Consulting (Nalepa)	13.1	270.00	3,537.00
Work Completed thru - November 30, 2020		<b>TOTAL DUE</b>	<b>\$3,537.00</b>

## Monthly Recap

Karl Nalepa

Date	Task	Hours
November 2, 2020	Review filing.	1.80
November 3, 2020	Continue to review filing.	1.30
November 5, 2020	Review filing.	0.50
November 6, 2020	Review discovery.	0.20
November 9, 2020	Review schedules.	0.80
November 11, 2020	Review draft preliminary issues and send edits to B. Foley.	0.70
November 13, 2020	Review responses to discovery.	0.80
November 16, 2020	Review responses to discovery.	0.80
November 18, 2020	Review schedules. Work on analysis.	1.20
November 19, 2020	Review responses to discovery.	0.80
November 23, 2020	Work on analysis and discovery.	1.00
November 24, 2020	Work on analysis and discovery.	0.80
November 25, 2020	Review responses to discovery.	0.70
November 30, 2020	Review responses to discovery. Work on analysis.	1.70
		<b>13.10</b>

## GARRETT GROUP CONSULTING, INC.

4028 OAKDALE FARM CIRCLE  
EDMOND, OK 73013

TELEPHONE (405) 239-2226

E-MAIL [MGARRETT@GARRETTGROUPLLC.COM](mailto:MGARRETT@GARRETTGROUPLLC.COM)

December 10, 2020

Alfred R. Herrera  
Herrera Law & Associates, PLLC  
816 Congress Avenue, Suite 950  
Austin, Texas 78701**RE: SWEPCO 2020 Rate Case; Docket No. PUC 51415**

Dear Freddy:

Our invoice for professional services in November 2020 in connection with the above-referenced case follows:

**I. Professional Services:**

A.	Mark Garrett JD, CPA – 18 hours at \$250.00 per hour (Details in Attachment A)	\$4,500.00
B.	Ed Farrar CPA – 6 hours at \$150.00 per hour (Details in Attachment B)	\$900.00
C.	Garry Garrett – 8 hours at \$125.00 per hour (Details in Attachment C)	\$1,000.00

**II. Expenses:**

Office Expenses	<u>N/C</u>
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<b>III. Total This Invoice:</b>	<b>\$6,400.00</b>
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We appreciate the opportunity to work with you on this case. Please call me if you have any questions.

Sincerely,



Mark E. Garrett

Attachments

MEG/gg

**Attachment A**

**Consulting Tasks for *SWEPCO 2020 Rate Case***  
*Docket No. PUC 51415*

*(Mark Garrett)*

**November 2020 – 18 Hours**

<b>Date</b>	<b>Task</b>	<b>Hours</b>
19	Review filing; work on discovery; work with other consultants.	6
24	Review filing; work on discovery; work with other consultants.	4
28	Review filing; work on discovery; work with other consultants.	4
29	Review filing; work on discovery; work with other consultants.	4
<b>Total</b>		<b>18</b>

**Attachment B**

**Consulting Tasks for SWEPCO 2020 Rate Case**  
*Docket No. PUC 51415*

*(Edwin Farrar)*

**November 2020 – 6 Hours**

<b>Date</b>	<b>Task</b>	<b>Hours</b>
18	Review application	1
19	Review application, testimony, and exhibits, draft discovery questions	5
<b>Total</b>		<b>6</b>

**Attachment C**

**Consulting Tasks for SWEPCO 2020 Rate Case**  
*Docket No. PUC 51415*

*(Garry Garrett)*

**November 2020 – 8 Hours**

<b>Date</b>	<b>Task</b>	<b>Hours</b>
17	Initial case review and analysis	2
18	Develop issues, develop discovery	4
19	Develop issues, develop discovery	2
<b>Total</b>		<b>8</b>

***Norwood Energy Consulting, L.L.C.***

P. O. Box 30197  
Austin, Texas 78755-3197  
scott@scottnorwood.com  
(512) 297-1889

Mr. Alfred R. Herrera  
Herrera Law & Associates, PLLC  
4400 Medical Parkway  
Austin, Texas 78756

Date: 12-11-20  
Tax ID #: 26-2374359  
Invoice#: SWP Rate NOV20

Re: SWEPCO Base Rate Case Analysis - PUC Docket No. 51415



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Statement for professional services rendered 11-1-20 through 11-30-20

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11-02-20	Reviewed Dolet Hills retirement issues and RFI responses	5.0 hrs
11-04-20	Reviewed issues on allocation of Turk merchant costs	4.5 hrs
11-17-20	Reviewed SWEPCO coal inventory levels; reviewed RFIs	4.0 hrs
11-20-20	Reviewed SWEPCO RFI responses; reviewed economic viability data and plant operating costs	5.0 hrs
11-24-20	Reviewed plant operating costs; reviewed RFIs; reviewed SWEPCO purchased capacity issues	<u>6.5 hrs</u>

Total hours: 25.0 hrs

Total due: 25.0 hours at \$220 per hour = \$5,500

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Thank you for the opportunity to assist with this project.

---





**Resolve Utility Consulting PLLC**  
101 Park Avenue  
Suite 1125  
Oklahoma City, Oklahoma 73102  
(405) 249-1050

## INVOICE

**Bill To**  
**Herrera Law & Associates, PLLC**  
4400 Medical Parkway  
Austin, TX 78701

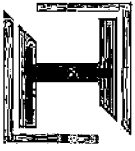
**Invoice#** INV-000354  
**Project Name** SWEPCO 51415

A handwritten signature, possibly 'SJB', is circled in ink.

Task & Date	Hours	Rate	Amount
Review application, testimony, exhibits and workpapers 11/02/20	3.75	200.00	750.00
Review application, testimony, exhibits and workpapers 11/05/20	2.50	200.00	500.00
Review application, testimony, exhibits and workpapers 11/10/20	3.00	200.00	600.00
Review application, testimony, exhibits and workpapers 11/12/20	3.75	200.00	750.00
Review depreciation study, Iowa curve analysis, and reserve ande remaining life calculations 11/16/20	3.25	200.00	650.00
Review application, testimony, exhibits and workpapers 11/18/20	3.00	200.00	600.00
Review depreciation study, Iowa curve analysis, and reserve ande remaining life calculations 11/20/20	3.00	200.00	600.00

EXHIBIT B  
32 of 115

Task & Date	Hours	Rate	Amount
Review depreciation study, Iowa curve analysis, and reserve ande remaining life calculations 11/23/20	2.25	200.00	450.00
Review depreciation study, Iowa curve analysis, and reserve ande remaining life calculations 11/30/20	2.75	200.00	550.00
Total Hours 27.25		<b>Total</b>	<b>\$5,450.00</b>
		<b>Balance Due</b>	<b>\$5,450.00</b>



January 11, 2021

Cities Advocating Reasonable Deregulation  
c/o Jim Finley  
City of Longview  
P.O. Box 1952  
Longview, Texas 75606-1952

**Re: PUC Docket No. 51415; *Application of Southwestern Electric Power Company for Authority to Change Rates*  
Account # 806**

Dear Jim:

Enclosed is our invoice for services provided to the Cities Advocating Reasonable Deregulation regarding the above referenced matter through December, 2020.

Please forward a copy of this invoice to the company.

If I can provide any further explanation about the services provided for you, please call me at (512) 474-1492.

Sincerely,

Alfred R. Herrera

ARH:ll  
Enclosure

**Herrera Law & Associates, PLLC**  
**4400 Medical Parkway**  
**Austin, TX 78756**  
**512-474-1492**

**January 11, 2021**

*Invoice submitted to:*

**Cities Advocating Reasonable Deregulation**

**c/o Jim Finley**

**City of Longview**

**P.O. Box 1952**

**Longview, TX 75606-1952**

*In Reference To:*

*Application of Southwestern  
Electric Power Company for  
Authority to Change Rates  
PUC DN 51415  
Acct #806*

---

**STATEMENT FOR PROFESSIONAL SERVICES**

**Legal Fees:**

		<u>Hrs/Rate</u>	<u>Amount</u>
12/01/20	Brennan Foley - Review and assess SOAH Order No. 2 setting procedural schedule and denying CARD's motion to compel	0.20 350.00/hr	70.00
12/02/20	Mariann Wood - Reviewed filings on PUC Interchange and updated case file; Updated discovery spreadsheet	0.70 145.00/hr	101.50
12/03/20	Brennan Foley - Research precedent re: plant retirement	1.80 350.00/hr	630.00
	Mariann Wood - Reviewed filings on PUC Interchange and updated case file	0.40 145.00/hr	58.00

*Cities Advocating Reasonable Deregulation*

Page 2

		<u>Hrs/Rate</u>	<u>Amount</u>
12/04/20	Sergio E. Herrera - Reviewed depreciation testimony	2.40 250.00/hr	600.00
	Sergio E. Herrera - Reviewed COC/ROR testimony	1.40 250.00/hr	350.00
	Brennan Foley - Review TIEC RFIs re: ROR	0.10 350.00/hr	35.00
12/07/20	Brennan Foley - Review responses to OPUC RFIs re: payroll and incentive compensation	0.30 350.00/hr	105.00
	Brennan Foley - Review 45-day update	1.00 350.00/hr	350.00
	Mariann Wood - Reviewed filings on PUC Interchange and updated case file; Updated discovery spreadsheet	3.50 145.00/hr	507.50
12/08/20	Sergio E. Herrera - Prep for zoom call with D. Garrett RE Rate Case	1.00 250.00/hr	250.00
	Sergio E. Herrera - Attended zoom call RE: D. Garrett's issues in Rate Case	1.00 250.00/hr	250.00
	Sergio E. Herrera -Reviewed Draft Preliminary Order	2.30 250.00/hr	575.00
	Brennan Foley - Review testimony and supporting schedules, conduct related research and participate in call with D. Garrett re: depreciation	2.50 350.00/hr	875.00
	Alfred R. Herrera - Assess effect of gen. retirements on depreciation expense	2.10 485.00/hr	1,018.50
12/09/20	Brennan Foley - Review responses to OPUC RFIs re: vegetation management (0.1) and taxes (0.1)	0.20 350.00/hr	70.00

*Cities Advocating Reasonable Deregulation*

Page 3

		<u>Hrs/Rate</u>	<u>Amount</u>
12/09/20	Brennan Foley - Review appeal of and motion to consolidate re: municipal rate ordinances	0.10 350.00/hr	35.00
	Alfred R. Herrera - Prep for and attend internal conference re: effect of gen. retirements on depreciation expense	0.60 485.00/hr	291.00
12/10/20	Sergio E. Herrera - Reviewed notes provided from consultants RE: impact of SWEPCO's decision to retire plants	1.10 250.00/hr	275.00
	Alfred R. Herrera - Research re: consultants to address prudence of decisions related to Dolet Hills mine	0.80 485.00/hr	388.00
12/11/20	Mariann Wood - Reviewed filings on PUC Interchange and updated case file; Updated discovery spreadsheet	0.40 145.00/hr	58.00
12/14/20	Brennan Foley - Review responses to Sierra Club RFIs	0.30 350.00/hr	105.00
	Brennan Foley - Review Sierra Club RFIs re: generation	0.10 350.00/hr	35.00
	Alfred R. Herrera - Prepare for and attend conference w/potential mining expert	1.60 485.00/hr	776.00
	Alfred R. Herrera - Review Brice, McMahon, & Baird re: treatment of Dolet Hills retirement	2.20 485.00/hr	1,067.00
12/15/20	Mariann Wood - Reviewed filings on PUC Interchange and updated case file	0.40 145.00/hr	58.00
12/16/20	Sergio E. Herrera - Reviewed Comm. Botkin's Memo RE: PO	0.50 250.00/hr	125.00
	Mariann Wood - Reviewed filings on PUC Interchange and updated case file; Updated discovery spreadsheet	1.50 145.00/hr	217.50
12/17/20	Sergio E. Herrera - Reviewed PO	1.20 250.00/hr	300.00

*Cities Advocating Reasonable Deregulation*

Page 4

		<u>Hrs/Rate</u>	<u>Amount</u>
12/17/20	Sergio E. Herrera - Reviewed testimonies (Bond, Jeffries, and McMahon) in RFP	4.10 250.00/hr	1,025.00
	Brennan Foley - Review Commissioner Bodkin memo re: preliminary order and monitor open meeting re: preliminary order	0.30 350.00/hr	105.00
12/18/20	Brennan Foley - Review OPUC RFIs re: generation (0.1) and ETSWD RFIs re: cost allocation/ rate design (0.1)	0.20 350.00/hr	70.00
	Mariann Wood - Reviewed filings on PUC Interchange and updated case file	0.20 145.00/hr	29.00
12/19/20	Mariann Wood - Reviewed filings on PUC Interchange and updated case file; Updated discovery spreadsheet	0.50 145.00/hr	72.50
12/21/20	Brennan Foley - Review and assess SWEPCO appeals of municipal actions and motion to consolidate	0.40 350.00/hr	140.00
	Alfred R. Herrera - Attend conference call re: effect of Dolet Hills and mine-closing costs on reconcilable fuel expense	0.60 485.00/hr	291.00
12/22/20	Brennan Foley - Review responses to OPUC RFIs re: payroll and incentive comp. (0.3) and storm reserve (0.2) and Staff RFIs re: cost of capital (0.3)	0.60 350.00/hr	210.00
	Brennan Foley - Review OPUC RFIs re: payroll (0.1) and Staff RFIs re: cost allocation and rate design (0.2)	0.30 350.00/hr	105.00
	Leslie Lindsey - Prepare, format, file and serve on all parties CARD's Protective Order Certifications	0.40 145.00/hr	58.00
12/23/20	Alfred R. Herrera - Review scope of work for non-testifying consultant re: Dolet Hills and U-Area of mine	0.60 485.00/hr	291.00
12/24/20	Mariann Wood - Reviewed filings on PUC Interchange and updated case file; Updated discovery spreadsheet	1.30 145.00/hr	188.50

*Cities Advocating Reasonable Deregulation*

Page 5

		<u>Hrs/Rate</u>	<u>Amount</u>
12/28/20	Alfred R. Herrera - Attend conference call re: effect of Dolet Hills and mine-closing costs on reconcilable fuel expense	0.60 485.00/hr	291.00
12/29/20	Sergio E. Herrera - Reviewed and compared mining issues in pending rate case with Fuel Rec.	1.40 250.00/hr	350.00
	Mariann Wood - Reviewed filings on PUC Interchange and updated case file; Updated discovery spreadsheet	0.50 145.00/hr	72.50
	Leslie Lindsey - Prepare, format, file and serve on all parties CARD's Protective Order Certifications	0.40 145.00/hr	58.00
<b>Total Legal Fees:</b>		<b>44.10</b>	<b>\$12,932.50</b>
<b>Expenses :</b>			
12/01/20	Consultant Invoice - Resolve Utility Consulting Inv #000378		7,450.00
	Research on Westlaw for the month of December 2020		40.95
	Consultant Invoice - ReSolved Energy Consulting - Inv #4703		3,159.00
<b>Total expenses:</b>			<b>\$10,649.95</b>
<b>TOTAL AMOUNT OF THIS BILL:</b>			<b>\$23,582.45</b>
<b>Previous balance</b>			<b>\$91,701.55</b>
<b>BALANCE DUE</b>			<b>\$115,284.00</b>





**Resolve Utility Consulting PLLC**

101 Park Avenue  
Suite 1125  
Oklahoma City, Oklahoma 73102  
(405) 249-1050

INVOICE

Bill To

**Herrera Law & Associates, PLLC**

4400 Medical Parkway

Austin, TX 78701

Invoice#

INV-000378

Project Name

SWEPCO 51415

A handwritten signature, possibly 'SWE', is circled in black ink.

Task & Date	Hours	Rate	Amount
Review application, testimony, exhibits and workpapers 12/01/20	3.50	200.00	700.00
Review depreciation study, Iowa curve analysis, and reserve ande remaining life calculations 12/03/20	3.75	200.00	750.00
Review depreciation study, Iowa curve analysis, and reserve ande remaining life calculations 12/07/20	3.50	200.00	700.00
Review depreciation study, Iowa curve analysis, and reserve ande remaining life calculations 12/10/20	4.00	200.00	800.00
Review depreciation study, Iowa curve analysis, and reserve ande remaining life calculations 12/14/20	2.75	200.00	550.00
Review depreciation study, Iowa curve analysis, and reserve ande remaining life calculations 12/17/20	3.00	200.00	600.00

Task & Date	Hours	Rate	Amount
Review depreciation study, Iowa curve analysis, and reserve and remaining life calculations 12/16/20	3.50	200.00	700.00
Review depreciation study, Iowa curve analysis, and reserve and remaining life calculations 12/21/20	3.75	200.00	750.00
Review depreciation study, Iowa curve analysis, and reserve and remaining life calculations 12/22/20	2.75	200.00	550.00
Review depreciation study, Iowa curve analysis, and reserve and remaining life calculations 12/28/20	3.25	200.00	650.00
Review depreciation study, Iowa curve analysis, and reserve and remaining life calculations 12/30/20	3.50	200.00	700.00
Total Hours 37.25		<b>Total</b>	<b>\$7,450.00</b>
		<b>Balance Due</b>	<b>\$7,450.00</b>

**WESTLAW Research**

**December 2020**

<b>Account #</b>	<b>Research Time</b>	<b>X \$65.00/hr.</b>	<b>+ Excluded Charges</b>	<b>Total</b>
████	████	X \$65.00		████
████	████	X \$65.00		████
806	0.63	X \$65.00		\$40.95
████	████	X \$65.00		████

**ReSolved Energy Consulting, LLC**

11044 Research Blvd, A-420

Austin, TX 78759

**Invoice**

DATE	INVOICE NUMBER
1/6/2021	4703

**BILL TO**

Herrera Law &amp; Associates, PLLC

Alfred Herrera

4400 Medical Parkway

Austin, Texas 78756

**PROJECT**

HL SWEPCO RC 51415

DESCRIPTION	HOURS	RATE	AMOUNT
Consulting (Nalepa)	11.7	270.00	3,159.00
Work Completed thru - December 31, 2020		<b>TOTAL DUE</b>	<b>\$3,159.00</b>

## Monthly Recap

Karl Nalepa

Date	Task	Hours
December 1, 2020	Review 45 day update.	0.80
December 2, 2020	Work on cost allocation.	1.50
December 3, 2020	Work on analysis.	1.00
December 7, 2020	Review responses to discovery.	0.80
December 8, 2020	Work on cost allocation.	0.70
December 9, 2020	Work on analysis.	0.50
December 14, 2020	Compile review issues and send to F. Herrera.	0.30
December 15, 2020	Review responses to discovery.	0.50
December 17, 2020	Review filing and work on analysis.	1.20
December 18, 2020	Review preliminary order. Review filing.	1.30
December 21, 2020	Review responses to discovery.	0.30
December 22, 2020	Work on rate design.	0.80
December 23, 2020	Work on analysis.	0.50
December 28, 2020	Review filing for fuel costs.	1.50
		<b>11.70</b>



February 9, 2021

Cities Advocating Reasonable Deregulation  
c/o Jim Finley  
City of Longview  
P.O. Box 1952  
Longview, Texas 75606-1952

**Re: PUC Docket No. 51415; *Application of Southwestern Electric Power Company for Authority to Change Rates***  
**Account # 806**

Dear Jim:

Enclosed is our invoice for services provided to the Cities Advocating Reasonable Deregulation regarding the above referenced matter through January, 2021.

Please forward a copy of this invoice to the company.

If I can provide any further explanation about the services provided for you, please call me at (512) 474-1492.

Sincerely,

A handwritten signature in black ink, appearing to read 'Alfred R. Herrera'.

Alfred R. Herrera

ARH:ll  
Enclosure

**PUC Docket No. 51415,**  
*Application of Southwestern Electric Power Company for the Authority to  
Change Rates*

Expense Summary Sheet  
Through January 2021

	<u>Previous Total</u>	<u>January</u>	<u>Cumulative Total</u>
<b>Herrera Law &amp; Associates, PLLC</b>			
Attorney Fees	\$77,410.50	\$7,570.50	\$84,981.00
<b>Expenses:</b>			
Copy Expense			
Postage Expense			
FedEx Expense			
Fax Expense			
Court Fees			
Delivery Expense			
Research	\$123.50	\$34.45	\$157.95
Outside Copies			
Court Reporter/Transcript			
Travel-Airfare			
Travel Car/Gas/Parking			
Travel – Mileage			
Travel – Hotel			
Norwood Energy Consulting	\$10,890.00	\$7,920.00	\$18,810.00
ReSolved Energy Consulting	\$7,560.00	\$1,881.00	\$9,441.00
Garrett Group, Inc.	\$6,400.00	\$14,450.00	\$20,850.00
Resolve Utility Consulting	\$12,900.00		\$12,900.00
<b>Total</b>	<b>\$115,284.00</b>	<b>\$31,855.95</b>	<b>\$147,139.95</b>
<b>Amount received</b>			<b><u>(\$0.00)</u></b>
<b>Balance</b>			<b>\$147,139.95</b>

**Herrera Law & Associates, PLLC**  
**4400 Medical Parkway**  
**Austin, TX 78756**  
**512-474-1492**

**February 9, 2021**

*Invoice submitted to:*

**Cities Advocating Reasonable Deregulation**

**c/o Jim Finley**

**City of Longview**

**P.O. Box 1952**

**Longview, TX 75606-1952**

*In Reference To:*

*Application of Southwestern  
Electric Power Company for  
Authority to Change Rates  
PUC DN 51415  
Acct #806*

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**STATEMENT FOR PROFESSIONAL SERVICES**

**Legal Fees:**

		<u>Hrs/Rate</u>	<u>Amount</u>
01/05/21	Mariann Wood - Prepared CARD's 5th Set of RFIs; Reviewed and updated case file; Updated Discovery spreadsheet	0.80 145.00/hr	116.00
	Brennan Foley - Review and revise RFIs re: payroll	0.30 350.00/hr	105.00
	Leslie Lindsey - Prepare, format, file and serve on all parties CARD's 5th Set of RFIs to SWEPCO	0.60 145.00/hr	87.00
01/07/21	Mariann Wood - Reviewed filings on PUC Interchange and updated case file	0.10 145.00/hr	14.50



*Cities Advocating Reasonable Deregulation*

Page 2

		<u>Hrs/Rate</u>	<u>Amount</u>
01/07/21	Brennan Foley - Review SWEPCO's proof of notice	0.20 350.00/hr	70.00
01/11/21	Mariann Wood - Reviewed filings on PUC Interchange and updated case file; Updated discovery spreadsheet	0.80 145.00/hr	116.00
01/12/21	Mariann Wood - Reviewed filings on PUC Interchange and updated case file; Updated discovery spreadsheet	1.00 145.00/hr	145.00
01/14/21	Mariann Wood - Reviewed filings on PUC Interchange and updated case file; Updated discovery spreadsheet	0.30 145.00/hr	43.50
	Sergio E. Herrera - Reviewed discovery and updated filings on interchange	0.50 250.00/hr	125.00
01/15/21	Mariann Wood - Reviewed filings on PUC Interchange and updated case file	0.50 145.00/hr	72.50
	Brennan Foley - Review responses to CARD RFIs re: payroll and incentive comp. (0.5), taxes (0.2) and vegetation management (0.3)	1.00 350.00/hr	350.00
01/18/21	Mariann Wood - Updated discovery spreadsheet	2.00 145.00/hr	290.00
01/19/21	Brennan Foley - Review Nucor Steel RFIs re: cost allocation/rate design (0.1) and TIEC RFIs re: SPP issues (0.1) and responses to ETSWD RFIs re: cost allocation and rate design (0.1)	0.30 350.00/hr	105.00
01/20/21	Mariann Wood - Reviewed filings on PUC Interchange and updated case file	0.30 145.00/hr	43.50
	Brennan Foley - Review responses to PUC RFIs re: payroll	0.20 350.00/hr	70.00
	Alfred R. Herrera - Review various SWEPCO responses to discovery	2.60 485.00/hr	1,261.00

*Cities Advocating Reasonable Deregulation*

Page 3

		<u>Hrs/Rate</u>	<u>Amount</u>
01/21/21	Brennan Foley - Review responses to Staff RFIs re: cost allocation and rate design	0.30 350.00/hr	105.00
	Brennan Foley - Review SWEPCO motion to consolidate and appeal of muni. actions	0.20 350.00/hr	70.00
	Sergio E. Herrera - Reviewed testimony and WP RE: potential split of Oxbow. Mine issue	1.10 250.00/hr	275.00
01/22/21	Mariann Wood - Reviewed filings on PUC Interchange and updated case file	0.20 145.00/hr	29.00
	Brennan Foley - Draft denial resolution and AIS	2.40 350.00/hr	840.00
01/23/21	Mariann Wood - Reviewed filings on PUC Interchange and updated case file; Updated discovery spreadsheet	1.50 145.00/hr	217.50
01/25/21	Brennan Foley - Draft denial resolution and AIS	2.30 350.00/hr	805.00
	Alfred R. Herrera - Review and revise draft denial resolution and accompanying agenda-info sheet	1.20 485.00/hr	582.00
01/26/21	Mariann Wood - Reviewed filings on PUC Interchange and updated case file; Updated discovery spreadsheet	0.90 145.00/hr	130.50
	Brennan Foley - Review TIEC RFIs re: SPP issues (0.1) and responses to CARD RFIs re: payroll (0.3) and OPUC RFIs re: storm reserve (0.2)	0.60 350.00/hr	210.00
01/27/21	Mariann Wood - Reviewed filings on PUC Interchange and updated case file; Prepared CARD's 6th Set of RFIs	0.80 145.00/hr	116.00
	Brennan Foley - Review Staff RFIs re: generation (0.1) and taxes (0.1)	0.20 350.00/hr	70.00

*Cities Advocating Reasonable Deregulation*

Page 4

		<u>Hrs/Rate</u>	<u>Amount</u>
01/27/21	Brennan Foley - Research precedent on case issues	1.20 350.00/hr	420.00
01/28/21	Brennan Foley - Research precedent re: storm reserve	0.50 350.00/hr	175.00
	Sergio E. Herrera - Reviewed CARD Depreciation RFIs	0.50 250.00/hr	125.00
01/29/21	Brennan Foley - Review CARD RFIs re: depreciation (0.2) and TIEC RFIs re: SPP issues (0.1) and Staff RFIs re: generation issues (0.1)	0.40 350.00/hr	140.00
	Leslie Lindsey - File and serve CARD's 6th Set of RFIs to SWEPCO	0.20 145.00/hr	29.00
01/30/21	Mariann Wood - Reviewed filings on PUC Interchange and updated case file; Updated discovery spreadsheet	1.50 145.00/hr	217.50
	<b>Total Legal Fees:</b>	<b>27.50</b>	<b>\$7,570.50</b>
	<b>Expenses :</b>		
12/01/20	Consultant Invoice - Garrett Group Consulting, Inc.		14,450.00
	Consultant Invoice - Norwood Energy Consulting, LLC Inv #SWPRate DEC20		5,060.00
01/01/21	Consultant Invoice - Norwood Energy Consulting, LLC Inv #SWPRate JAN21		2,860.00
	Consultant Invoice - ReSolved Energy Consulting, LLC Inv #4728		1,881.00
	Research on Westlaw for the month of January 2021		34.45
	<b>Total expenses:</b>		<b>\$24,285.45</b>
	<b>TOTAL AMOUNT OF THIS BILL:</b>		<b>\$31,855.95</b>

*Cities Advocating Reasonable Deregulation*

Page 5

	<u>Amount</u>
<b>Previous balance</b>	<b>\$115,284.00</b>
<b>BALANCE DUE</b>	<b><u>\$147,139.95</u></b>

## GARRETT GROUP CONSULTING, INC.

4028 OAKDALE FARM CIRCLE  
EDMOND, OK 73013

TELEPHONE (405) 239-2226

E-MAIL [MGARRETT@GARRETTGROUPLLC.COM](mailto:MGARRETT@GARRETTGROUPLLC.COM)

January 21, 2021

Alfred R. Herrera  
Herrera Law & Associates, PLLC  
816 Congress Avenue, Suite 950  
Austin, Texas 78701**RE: SWEPCO 2020 Rate Case; Docket No. PUC 51415**

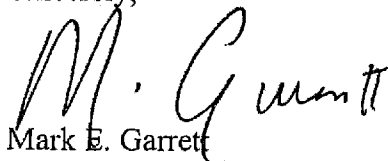
Dear Freddy:

Our invoice for professional services in December 2020 in connection with the above-referenced case follows:

I.	<b>Professional Services:</b>	
A.	Mark Garrett JD, CPA – 36 hours at \$250.00 per hour (Details in Attachment A)	\$9,000.00
B.	Heather Garrett JD, CPA – 10 hours at \$200.00 per hour (Details in Attachment B)	\$2,000.00
C.	Ed Farrar CPA – 13 hours at \$150.00 per hour (Details in Attachment C)	\$1,950.00
D.	Garry Garrett – 12 hours at \$125.00 per hour (Details in Attachment D)	\$1,500.00
II.	<b>Expenses:</b>	
	Office Expenses	<u>N/C</u>
III.	<b>Total This Invoice:</b>	<b>\$14,450.00</b>

We appreciate the opportunity to work with you on this case. Please call me if you have any questions.

Sincerely,

Mark E. Garrett  
Attachments

MEG/gg

Attachment A

Consulting Tasks for SWEPSCO 2020 Rate Case  
Docket No. PUC 51415

(Mark Garrett)

December 2020 – 36 Hours

Date	Task	Hours
1	Review testimony and exhibits	2
9	Review testimony and exhibits	4
11	Review 45-day update	6
15	Review discovery; develop issues	4
17	Review discovery; develop issues	4
18	Review discovery; develop issues	4
22	Review discovery; develop issues; review prior cases	6
29	Review discovery; develop issues; review prior cases	6
Total		36

**Attachment B****Consulting Tasks for *SWEPCO 2020 Rate Case***  
*Docket No. PUC 51415**(Heather Garrett)***December 2020 – 10 Hours**

<b>Date</b>	<b>Task</b>	<b>Hours</b>
12	Review 45-day update	4
14	Work on exhibits	3
16	Work on exhibits	3
<b>Total</b>		<b>10</b>

**Attachment C**

**Consulting Tasks for SWEPCO 2020 Rate Case**  
*Docket No. PUC 51415*

*(Edwin Farrar)*

**December 2020 – 13 Hours**

<b>Date</b>	<b>Task</b>	<b>Hours</b>
9	Review 45-day update	1
15	Review discovery responses, rate case issues	2
16	Review exhibits and work papers, perform analysis	5
17	Review exhibits and work papers, perform analysis	3
28	Review discovery responses, rate case issues	1
29	Review discovery responses, rate case issues	1
<b>Total</b>		<b>13</b>



**Attachment D**

**Consulting Tasks for SWEPCO 2020 Rate Case**  
*Docket No. PUC 51415*

*(Garry Garrett)*

**December 2020 – 12 Hours**

<b>Date</b>	<b>Task</b>	<b>Hours</b>
10	Develop issues	2
15	Develop issues	4
16	Develop issues	4
17	Develop issues	2
<b>Total</b>		<b>12</b>

***Norwood Energy Consulting, L.L.C.***

P. O. Box 30197  
Austin, Texas 78755-3197  
scott@scottnorwood.com  
(512) 297-1889

Mr. Alfred R. Herrera  
Herrera Law & Associates, PLLC  
4400 Medical Parkway  
Austin, Texas 78756

Date: 2-9-21  
Tax ID #: 26-2374359  
Invoice#: SWPRate DEC20

Re: SWEPCO Base Rate Case Analysis - PUC Docket No. 51415

*(806)*

---

Statement for professional services rendered 12-1-20 through 12-31-20

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12-07-20	Reviewed SWEPCO RFI responses	5.0 hrs
12-10-20	Reviewed coal and lignited unit performance issues	6.5 hrs
12-15-20	Reviewed SWEPCO Dolet Hills fuel and retirement issues	6.0 hrs
12-16-20	Reviewed RFI responses; reviewed previous orders and testimony on lignite unit performance	<u>5.5 hrs</u>
Total hours:		23.0 hrs

Total due: 23.0 hours at \$220 per hour = \$5,060

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Thank you for the opportunity to assist with this project.

---

***Norwood Energy Consulting, L.L.C.***

P. O. Box 30197  
Austin, Texas 78755-3197  
scott@scottnorwood.com  
(512) 297-1889

Mr. Alfred R. Herrera  
Herrera Law & Associates, PLLC  
4400 Medical Parkway  
Austin, Texas 78756

Date: 2-9-21  
Tax ID #: 26-2374359  
Invoice#: SWPRate JAN21

Re: SWEPCO Base Rate Case Analysis - PUC Docket No. 51415

806

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Statement for professional services rendered 1-1-21 through 1-31-21

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1-11-21	Reviewed SWEPCO testimony and purchased power schedules; reviewed production capital additions	5.0 hrs
1-15-21	Reviewed lignite unit performance; reviewed imputed capacity value for renewable PPAs and SWEPCO capacity requirements	3.5 hrs
1-20-21	Reviewed Dolet Hills and Pirkey early retirement issues	<u>4.5 hrs</u>
Total hours:		13.0 hrs

Total due: 13.0 hours at \$220 per hour = \$2,860

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Thank you for the opportunity to assist with this project.

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**ReSolved Energy Consulting, LLC**

11044 Research Blvd, A-420

Austin, TX 78759

EXHIBIT B

58 of 115

**Invoice**

DATE	INVOICE NUMBER
2/4/2021	4728

**BILL TO**

Herrera Law &amp; Associates, PLLC

Alfred Herrera

4400 Medical Parkway

Austin, Texas 78756

**PROJECT**

HL SWEPCO RC 51415

DESCRIPTION	HOURS	RATE	AMOUNT
Consulting (Nalepa)	4.1	270.00	1,107.00
Consulting (Cromleigh)	4.3	180.00	774.00
Total Labor			1,881.00
Work Completed thru - January 29, 2021		<b>TOTAL DUE</b>	<b>\$1,881.00</b>

## Monthly Recap

Karl Nalepa

Date	Task	Hours
January 8, 2021	Review discovery.	0.30
January 11, 2021	Work on analysis.	0.80
January 12, 2021	Work on analysis.	0.70
January 14, 2021	Review responses to discovery.	0.50
January 21, 2021	Work on analysis.	0.80
January 22, 2021	Review responses to discovery.	0.50
January 29, 2021	Review discovery.	0.50

**4.10**

JZB WKP 000382

EXHIBIT B  
59 of 115




## Monthly Recap

Erin Cromleigh

Date	Task	Hours
January 4, 2021	Review filing.	1.90
January 5, 2021	Review filing. Compile discovery.	2.40
		4.30

**WESTLAW Research**

**January 2021**

<b>Account #</b>	<b>Research Time</b>	<b>X \$65.00/hr.</b>	<b>+ Excluded Charges</b>	<b>Total</b>
		X \$65.00		
806	.53	X \$65.00		\$34.45



March 17, 2021

Cities Advocating Reasonable Deregulation  
c/o Jim Finley  
City of Longview  
P.O. Box 1952  
Longview, Texas 75606-1952

**Re: PUC Docket No. 51415; *Application of Southwestern Electric Power Company for Authority to Change Rates*  
Account # 806**

Dear Jim:

Enclosed is our invoice for services provided to the Cities Advocating Reasonable Deregulation regarding the above referenced matter through February, 2021.

Please forward a copy of this invoice to the company.

If I can provide any further explanation about the services provided for you, please call me at (512) 474-1492.

Sincerely,

A handwritten signature in black ink, appearing to read 'Alfred R. Herrera'.

Alfred R. Herrera

ARH:ll  
Enclosure



PUC Docket No. 51415,  
*Application of Southwestern Electric Power Company for the Authority to  
 Change Rates*

Expense Summary Sheet  
 Through February 2021

	<u>Previous Total</u>	<u>February</u>	<u>Cumulative Total</u>
<b>Herrera Law &amp; Associates, PLLC</b>			
Attorney Fees	\$84,981.00	\$29,862.50	\$114,843.50
<b>Expenses:</b>			
Copy Expense			
Postage Expense			
FedEx Expense			
Fax Expense			
Court Fees			
Delivery Expense			
Research	\$157.95	\$99.45	\$257.40
Outside Copies			
Court Reporter/Transcript			
Travel-Airfare			
Travel Car/Gas/Parking			
Travel – Mileage			
Travel – Hotel			
Norwood Energy Consulting	\$18,810.00	\$7,810.00	\$26,620.00
ReSolved Energy Consulting	\$9,441.00	\$6,246.00	\$15,687.00
Garrett Group, Inc.	\$20,850.00	\$22,425.00	\$43,275.00
Resolve Utility Consulting	\$12,900.00	\$17,650.00	\$30,550.00
J. Randall Woolridge		\$28,927.50	\$28,927.50
<b>Total</b>	<b>\$147,139.95</b>	<b>\$113,020.45</b>	<b>260,160.40</b>
<b>Amount received</b>			<u><b>(\$0.00)</b></u>
<b>Credit</b>			<u><b>(\$776.00)</b></u>
<b>Balance</b>			<b>\$259,384.40</b>

**Herrera Law & Associates, PLLC**  
**PO Box 302799**  
**Austin, TX 78703**  
**512-474-1492**

**March 17, 2021**

*Invoice submitted to:*

**Cities Advocating Reasonable Deregulation**

**c/o Jim Finley**

**City of Longview**

**P.O. Box 1952**

**Longview, TX 75606-1952**

*In Reference To:*

*Application of Southwestern  
Electric Power Company for  
Authority to Change Rates  
PUC DN 51415  
Acct #806*

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**STATEMENT FOR PROFESSIONAL SERVICES**

**Legal Fees:**

		<u>Hrs/Rate</u>	<u>Amount</u>
11/30/20	Brennan Foley - Review Sierra Club's motion to intervene	0.10 350.00/hr	35.00
	Brennan Foley - Review responses to Staff RFIs re: weather normalization (0.2) and vegetation management (0.2)	0.40 350.00/hr	140.00
02/03/21	Mariann Wood - Reviewed filings on PUC Interchange and updated case file; Updated discovery spreadsheet	1.10 145.00/hr	159.50
02/08/21	Mariann Wood - Reviewed filings on PUC Interchange and updated case file; Updated discovery spreadsheet	0.60 145.00/hr	87.00

*Cities Advocating Reasonable Deregulation*

Page 2

		<u>Hrs/Rate</u>	<u>Amount</u>
02/09/21	Mariann Wood - Reviewed filings on PUC Interchange and updated case file; Updated discovery spreadsheet	0.10 145.00/hr	14.50
	Leslie Lindsey - Prepare, format, CARD's 7th Set of RFIs to SWEPCO	0.30 145.00/hr	43.50
02/10/21	Brennan Foley - Review and revise RFIs and correspond with S. Norwood	0.70 350.00/hr	245.00
	Sergio E. Herrera - Reviewed S. Norwood RFI Draft	0.70 250.00/hr	175.00
	Sergio E. Herrera - Communicated with CARD witnesses RE: issues/SWEPCO testimonies	0.30 250.00/hr	75.00
	Sergio E. Herrera - Drafted table RE CARD witnesses issues	0.40 250.00/hr	100.00
	Sergio E. Herrera - Reviewed SWEPCO testimony, WPs, and Schedules RE CA/RD	6.30 250.00/hr	1,575.00
	Leslie Lindsey - Prepare, format, file and serve on all parties CARD's 7th Set of RFIs to SWEPCO	0.20 145.00/hr	29.00
02/11/21	Mariann Wood - Reviewed filings on PUC Interchange and updated case file; Updated discovery spreadsheet	0.50 145.00/hr	72.50
	Brennan Foley - Review responses to CARD RFIs re: generation and discuss with S. Norwood; confer with P. Pearsall re: same	0.50 350.00/hr	175.00
	Brennan Foley - Conduct research re: DN 46449 appeal issues and TCRF issues and correspond with S. Norwood	1.50 350.00/hr	525.00
	Sergio E. Herrera - Reviewed direct testimonies RE: CARD witness identified issues	2.90 250.00/hr	725.00
	Leslie Lindsey - Emails with consultant, attorney and SWEPCO regarding missing attachments to RFIs	0.30 145.00/hr	43.50

*Cities Advocating Reasonable Deregulation*

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		<u>Hrs/Rate</u>	<u>Amount</u>
02/12/21	Brennan Foley - Review TIEC RFIs re: Welsh Unit 2 issues	0.10 350.00/hr	35.00
	Sergio E. Herrera - Reviewed SWEPCO direct testimonies RE: CARD Witness issues	2.30 250.00/hr	575.00
	Sergio E. Herrera - Conducted research RE: status of appeal of 40443 per S. Norwood question	0.50 250.00/hr	125.00
	Alfred R. Herrera - Review recent credit-rating agency reports re: AEP/SWEPCO and similar utilities	2.30 485.00/hr	1,115.50
02/15/21	Alfred R. Herrera - Review various SWEPCO responses to discovery (CARD 1st-PPA Cap costs and related direct testimony)	2.60 485.00/hr	1,261.00
02/16/21	Sergio E. Herrera - Reviewed SWEPCO Direct testimony RE: depreciation and cost allocation	4.30 250.00/hr	1,075.00
	Alfred R. Herrera - Review various SWEPCO responses to discovery (CARD 2nd-Plant Cap Factors and related direct testimony)	2.80 485.00/hr	1,358.00
02/17/21	Brennan Foley - Review RFI responses re: generation and consult with S. Norwood	0.80 350.00/hr	280.00
	Alfred R. Herrera - Review various SWEPCO responses to discovery (CARD 2nd-New Cap Addtns and related direct testimony)	4.10 485.00/hr	1,988.50
02/18/21	Mariann Wood - Reviewed filings on PUC Interchange and updated case file; Updated discovery spreadsheet	0.80 145.00/hr	116.00
	Brennan Foley - Prepare RFIs re: payroll	0.20 350.00/hr	70.00
	Brennan Foley - Review RFI responses and correspond with P. Pearsall re: same	0.60 350.00/hr	210.00

*Cities Advocating Reasonable Deregulation*

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		<u>Hrs/Rate</u>	<u>Amount</u>
02/18/21	Alfred R. Herrera - Review various SWEPCO responses to discovery (CARD 2nd-system reliability/interruptions and related direct testimony)	3.90 485.00/hr	1,891.50
	Leslie Lindsey - Prepare, format, file and serve on all parties CARD's 8th Set of RFIs to SWEPCO	0.50 145.00/hr	72.50
02/19/21	Mariann Wood - Reviewed filings on PUC Interchange and updated case file; Updated discovery spreadsheet	1.40 145.00/hr	203.00
	Brennan Foley - Review OPUC RFIs re: generation (0.1), responses to OPUC RFIs re: incentive compensation (0.1), responses to Staff RFIs re: generation (0.1) and vegetation management (0.1), taxes (0.1) and depreciation (0.1), TIEC RFIs re: CA/RD (0.3) and CARD RFIs re: depreciation (0.5) and generation (0.1)	1.50 350.00/hr	525.00
	Sergio E. Herrera - Reviewed updated Discovery requests from Sierra Club	0.50 250.00/hr	125.00
	Sergio E. Herrera - Reviewed SWEPCO's responses to CARD and TIEC's First RFI	1.80 250.00/hr	450.00
	Alfred R. Herrera - Review various SWEPCO responses to discovery (CARD 2nd-Veg Management, SAIDI/SAIFI repts/data and related testimony)	4.10 485.00/hr	1,988.50
02/22/21	Brennan Foley - Correspond with P. Pearsall and S. Norwood re: CARD RFIs	0.30 350.00/hr	105.00
	Sergio E. Herrera - Reviewed SWEPCO direct testimony/WP RE: Allocation and weather norm.	4.50 250.00/hr	1,125.00
	Sergio E. Herrera - Reviewed SWEPCO direct testimony/WP RE: depreciation issues	2.90 250.00/hr	725.00
	Alfred R. Herrera - Review SWEPCO responses to RFIs (CARD 3rd-Cost of Capital and related dir. testimonies)	2.60 485.00/hr	1,261.00

*Cities Advocating Reasonable Deregulation*

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		<u>Hrs/Rate</u>	<u>Amount</u>
02/22/21	Alfred R. Herrera - Review credit-rating reports re: SWEPCO	1.20 485.00/hr	582.00
02/23/21	Mariann Wood - Reviewed filings on PUC Interchange and updated case file; Updated discovery spreadsheet	1.80 145.00/hr	261.00
	Sergio E. Herrera - Reviewed SWEPCO Direct RE: issues pertaining to Pirkey/Dolet	3.10 250.00/hr	775.00
	Alfred R. Herrera -Review SWEPCO responses to RFIs (CARD 3rd-Cost of Capital and related dir. testimonies)	1.70 485.00/hr	824.50
02/24/21	Sergio E. Herrera - Reviewed SWEPCO Application RE: Imputed Capacity	1.20 250.00/hr	300.00
	Sergio E. Herrera - Reviewed SWEPCO Application RE: Plant Operations	3.10 250.00/hr	775.00
	Alfred R. Herrera - Review Sierra Club's 3rd and TIEC's 8th RFIs to SWEPCO	1.20 485.00/hr	582.00
	Alfred R. Herrera - Review SWEPCO responses to RFIs (CARD 3rd-Cost of Capital and related dir. testimonies-D'Ascendis)	2.20 485.00/hr	1,067.00
	Alfred R. Herrera - Review SWEPCO responses to RFIs (CARD 4th RFIs-Post TY changes and related testimonies)	1.80 485.00/hr	873.00
02/25/21	Mariann Wood - Reviewed filings on PUC Interchange and updated case file	0.20 145.00/hr	29.00
	Brennan Foley - Review Staff RFIs re: vegetation management (0.1) and incentive compensation (0.1), OPUC RFIs re: taxes (0.1) and generation (0.1), Sierra Club RFIs re: generation (0.2), ETEc RFIs re: generation (0.1) and accounting issues (0.1), TIEC RFIs re: cost of capital (0.1) and responses to Nucor Steel RFIs re: CA/RD (0.2), TIEC RFIs re: CA/RD (0.2), Sierra Club RFIs re: generation (0.3), ETSWD RFIs re: CA/RD (0.1)	1.70 350.00/hr	595.00

*Cities Advocating Reasonable Deregulation*

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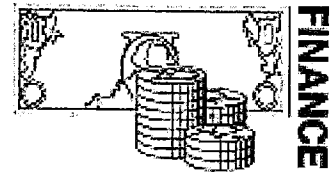
		<u>Hrs/Rate</u>	<u>Amount</u>
02/25/21	Brennan Foley - Conduct research re: cost of capital	0.50 350.00/hr	175.00
	Alfred R. Herrera - Review TIEC's 9th RFI to SWEPCO	0.70 485.00/hr	339.50
	Alfred R. Herrera - Review SWEPCO's responses to discovery (CARD 4th-Payroll expenses and related testimonies)	1.40 485.00/hr	679.00
02/26/21	Mariann Wood - Reviewed filings on PUC Interchange and updated case file; Updated discovery spreadsheet	0.60 145.00/hr	87.00
	Sergio E. Herrera - Reviewed SWEPCO Direct testimony/WP/Schedules RE: retirement issues	2.10 250.00/hr	525.00
	Sergio E. Herrera - Reviewed SWEPCO Direct testimony/WP RE: Cost of Cap./CS/DR	1.80 250.00/hr	450.00
02/28/21	Mariann Wood - Reviewed filings on PUC Interchange and updated case file; Updated discovery spreadsheet	0.30 145.00/hr	43.50
<b>Total Legal Fees:</b>		<b>88.90</b>	<b>\$29,862.50</b>
<b>Expenses :</b>			
10/01/20	Consultant Invoice - Randy Woolridge Inv #First Billing		28,927.50
01/01/21	Consultant Invoice - ReSolve Utility Consulting Inv-000399		8,400.00
	Consultant Invoice - Garrett Group Consulting, Inc.		22,425.00
02/01/21	Consultant Invoice - ReSolve Utility Consulting Inv-000400		9,250.00
	Consultant Invoice - Norwood Energy Consulting, LLC Inv #SWPRate Feb21		7,810.00
	Consultant Invoice - ReSolved Energy Consulting, LLC Inv #4736		6,246.00

*Cities Advocating Reasonable Deregulation*

Page 7

		<u>Amount</u>
02/01/21	Research on Westlaw for the month of February 2021	99.45
	<b>Total expenses:</b>	<b>\$83,157.95</b>
	<b>TOTAL AMOUNT OF THIS BILL:</b>	<b>\$113,020.45</b>
	<b>Previous balance</b>	<b>\$147,139.95</b>
3/15/2021	Credit ~ 10/16/20 Charge : Alfred R. Herrera - Various communications with parties and prepare summary of proposed settlement re: SPS's withdrawal of application	(\$776.00)
	<b>Total payments and adjustments</b>	<b>(\$776.00)</b>
	<b>BALANCE DUE</b>	<b>\$259,384.40</b>





# INVOICE

**FROM:** J. Randall Woolridge, Ph.D.  
120 Haymaker Circle  
State College, PA 16801

**TO:** Herrera & Boyle, PLLC  
816 Congress Ave., Suite 1250  
Austin, Tx 78701

**RE:** Southwestern Electric Power Company  
Docket No. 51415

806

**DATE:** 3/18/2021  
First Billing

I. PROFESSIONAL SERVICES AND OVERHEAD		Issue	Phase	
A. J. RANDALL WOOLRIDGE		Code	Code	
DATE	DESCRIPTION			HOURS
10 / 1 / 2020	Review Case Documents and Filing	6	A	2.0
	Review Company Background	6	D	1.5
	Review previous Rate Cases	6	D	2.0
	Review Testimonies - D'Ascendis, Hawkins	6	G	3.0
	Prepare -Send Interrogatories - 4X	6	B	2.5
Various	Review Email and Related Documents	6	D	1.0
Various	Research Rate of Return Issues	6	D	1.0
Various	Review Case with Counsel and Consultants	6	D	0.0
HOURS				13.0
11 / 1 / 2020	Review Documents	6	A	2.0
	Review Capital Market Data	6	D	2.0
	Prepare/Review Issues List	6	D	2.5
	Review Data Responses	6	B	1.0
	Review Credit Reports	6	D	2.0
Various	Review Email and Related Documents	6	D	1.0
Various	Research Rate of Return Issues	6	D	0.0
Various	Review Case with Counsel and Consultants	6	D	0.0
HOURS				10.5
12 / 1 / 2020	Review Documents	6	A	1.0
	Review Capital Market Data	6	D	1.0
	Review Data Responses	6	B	1.5
Various	Review Email and Related Documents	6	D	1.0
Various	Research Rate of Return Issues	6	D	0.0
Various	Review Case with Counsel and Consultants	6	D	0.0

HOURS						4.5
1 /	1 /	2021	Review Documents	6	A	1.0
			Review Capital Market Data	6	D	1.0
			Review D'Ascendis Testimonies	6	D	2.0
Various			Review Email and Related Documents	6	D	1.0
Various			Research Rate of Return Issues	6	D	0.0
Various			Review Case with Counsel and Consultants	6	D	0.0
HOURS						5.0
2 /	1 /	2021	Review Documents	6	A	1.5
			Review Capital Market Data	6	D	2.0
			Update Capital Market Data - CRs, DPS, EPS	6	D	2.5
			Collect Cost of Capital Data	6	E	1.0
			Prepare Proxy Group	6	E	2.0
			Evaluate Utility and Capital Structure Issues	6	D	2.0
			Prepare US ROE Rate Case Study	6	D	3.0
			Prepare TX ROE Study	6	D	3.5
			Prepare Exhibits - 3X	6	E	4.0
			Prepare Testimony - 3X	6	E	4.0
			Review Data Request Responses	6	B	1.0
Various			Review Email and Related Documents	6	D	1.0
Various			Research Rate of Return Issues	6	D	4.0
Various			Review Case with Counsel and Consultants	6	D	0.0
HOURS						31.5
3 /	1 /	2021	Review Documents	6	A	1.5
			Review Capital Market Data	6	D	1.5
			Review Data Responses	6	B	2.0
			Collect Cost of Capital Data	6	E	2.5
			Prepare Exhibits - 3X	6	E	6.0
			Prepare Testimony - 3X	6	E	10.0
			Update Capital Market Summary	6	E	3.0
			Prepare DCF Study - Electric Proxy Group	6	E	4.0
			Prepare CAPM Study - Electric Proxy Group	6	E	2.5
			Prepare/Revise/Send Testimony/Appendices -	6	E	2.0
Various			Review Email and Related Documents	6	D	1.0
Various			Research Rate of Return Issues	6	D	1.0
Various			Review Case with Counsel and Consultants	6	D	0.0
HOURS						37.0
TOTAL HOURS						101.5
PROFESSIONAL SERVICES @ \$285.00/HOUR						\$28,927.50
II. EXPENSES						
a	Travel					
b.	1. Office Expenses (Fed Ex)					
TOTAL EXPENSES						
III. TOTAL BILLING						
TOTAL PROFESSIONAL SERVICES PLUS EXPENSES						\$28,927.50
TOTAL BILLING						\$28,927.50



## INVOICE

**Bill To****Herrera Law & Associates, PLLC**

4400 Medical Parkway

Austin, TX 78701

Invoice#

INV-000399 ✓

Project Name

SWEPCO 51415 ✓

Task & Date	Hours	Rate	Amount
Review and organize actuarial data, review depreciation study, and review dismantlement studies 01/05/21	4.50	200.00	900.00
Review actuarial data, observed life tables and net salvage data 01/07/21	3.75	200.00	750.00
Review and organize actuarial data, review depreciation study, and review dismantlement studies 01/11/21	4.00	200.00	800.00
Review Iowa curve and net salvage analysis and build observed life tables 01/12/21	4.25	200.00	850.00
Review actuarial data, observed life tables and net salvage data 01/14/21	4.75	200.00	950.00
Review application, testimony, exhibits and workpapers 01/15/21	2.50	200.00	500.00

Task & Date	Hours	Rate	EXHIBIT B	
			74 of 115	Amount
Review and organize actuarial data, review depreciation study, and review dismantlement studies 01/19/21	3.50	200.00		700.00
Review actuarial data, observed life tables and net salvage data 01/21/21	3.75	200.00		750.00
Review and organize actuarial data, review depreciation study, and review dismantlement studies 01/23/21	3.00	200.00		600.00
Review Iowa curve and net salvage analysis and build observed life tables 01/27/21	4.00	200.00		800.00
Review dismantlement study and analysis, and conduct service life and net salvage analysis 01/29/21	4.00	200.00		800.00
Total Hours 42.00				
		<b>Total</b>		<b>\$8,400.00</b>
		<b>Balance Due</b>		<b>\$8,400.00</b>



**GARRETT GROUP CONSULTING, INC.**  
4028 OAKDALE FARM CIRCLE  
EDMOND, OK 73013

TELEPHONE (405) 239-2226

E-MAIL [MGARRETT@GARRETTGROUPLLC.COM](mailto:MGARRETT@GARRETTGROUPLLC.COM)

March 15, 2021

Alfred R. Herrera  
Herrera Law & Associates, PLLC  
816 Congress Avenue, Suite 950  
Austin, Texas 78701



**RE: SWEPCO 2020 Rate Case; Docket No. PUC 51415**

Dear Freddie:

Our invoice for professional services in January and February of 2021 in connection with the above-referenced case follows:

**I. Professional Services:**

A.	Mark Garrett JD, CPA – 42 hours at \$250.00 per hour (Details in Attachment A)	\$10,500.00
B.	Ed Farrar CPA – 59.5 hours at \$150.00 per hour (Details in Attachment B)	\$8,925.00
C.	Garry Garrett – 24 hours at \$125.00 per hour (Details in Attachment C)	\$3,000.00

**II. Expenses:**

Office Expenses	<u>N/C</u>
-----------------	------------

<b>III. Total This Invoice:</b>	<b>\$22,425.00</b>
---------------------------------	--------------------

We appreciate the opportunity to work with you on this case. Please call me if you have any questions.

Sincerely,

Mark E. Garrett  
Attachments

MEG/gg

**Attachment A**

**Consulting Tasks for SWEPCO 2020 Rate Case**  
*Docket No. PUC 51415*

*(Mark Garrett)*

**January 2021 – 20 Hours**

Date	Task	Hours
4	Review filing; work on discovery; develop issues	2
5	Review filing; work on discovery; develop issues	2
6	Review filing; work on discovery; develop issues	2
7	Review filing; work on discovery; develop issues	2
8	Review filing; work on discovery; develop issues	2
12	Work on rate base issues	4
26	Work on depreciation and ADIT issues for early retirements	4
30	Work on accounting issues	2
Total		20

**February 2021 – 22 Hours**

Date	Task	Hours
2	Develop accounting issues	4
3	Develop accounting issues	4
5	Develop accounting issues	2
8	Develop depreciation issues for early retirement of plant	4
10	Develop depreciation issues for early retirement of plant	4
16	Develop accounting issues	2
26	Develop vegetation management issues	2
Total		22

**Attachment B**

**Consulting Tasks for SWEPFO 2020 Rate Case**  
*Docket No. PUC 51415*  
*(Edwin Farrar)*

**January 2021 24.5 Hours**

Date	Task	Hours
January 1	Review testimony and discovery responses	4.0
January 2	Review testimony, perform analysis, draft discovery	7.0
January 3	Review exhibits, and work papers	0.5
January 4	Review exhibits and work papers, perform analysis, draft discovery	6.0
January 5	Draft testimony on payroll issues	3.0
January 6	Review exhibits and work papers	1.0
January 22	Review exhibits and work papers	3.0
<b>Total</b>		<b>24.5</b>

**February 2021 35.0 Hours**

Date	Task	Hours
February 4	Review discovery responses, perform analysis, draft incentive adjustment	2.0
February 9	Review exhibits and work papers	1.0
February 10	Review discovery responses and perform analysis	3.0
February 17	Review discovery responses and perform analysis on payroll issues	4.5
February 18	Review discovery responses, perform analysis, draft discovery	1.0
February 19	Review work papers and perform analysis on incentive issues	2.5
February 22	Review exhibits and work papers, perform rate case analysis	3.0
February 23	Review exhibits and work papers, perform rate case analysis	6.0
February 24	Review exhibits and work papers on ADFIT, perform rate case analysis	5.0
February 25	Review exhibits and work papers on ADFIT, perform rate case analysis	4.0
February 28	Review discovery responses on ADFIT and EDFIT	3.0
<b>Total</b>		<b>35.0</b>

**Attachment C**

**Consulting Tasks for SWEPCO 2020 Rate Case**  
*Docket No. PUC 51415*

*(Garry Garrett)*

**January 2021 – 12 Hours**

<b>Date</b>	<b>Task</b>	<b>Hours</b>
8	Assemble documents, work on discovery	4
12	Assemble documents, research and analysis	4
13	Assemble documents, work on discovery	4
<b>Total</b>		<b>12</b>

**February 2021 – 12 Hours**

<b>Date</b>	<b>Task</b>	<b>Hours</b>
5	Assemble documents, research and analysis	4
11	Assemble documents, work on discovery	4
12	Assemble documents, work on discovery	4
<b>Total</b>		<b>12</b>





## INVOICE

**Bill To****Herrera Law & Associates, PLLC**

4400 Medical Parkway

Austin, TX 78701

Invoice#

INV-000400 ✓

Project Name

SWEPCO 51415 ✓

**Task & Date****Hours****Rate****Amount**Review dismantlement study and analysis, and conduct  
service life and net salvage analysis

4.00

200.00

800.00

02/02/21

Review and organize actuarial data, review depreciation study,  
and review dismantlement studies

4.25

200.00

850.00

02/03/21

Review depreciation study, Iowa curve analysis, and reserve  
and remaining life calculations

4.50

200.00

900.00

02/05/21

Review Iowa curve and net salvage analysis and build  
observed life tables

3.75

200.00

750.00

02/08/21

Review dismantlement study and analysis, and conduct  
service life and net salvage analysis

4.00

200.00

800.00

02/10/21

Review Iowa curve and net salvage analysis and build  
observed life tables

4.50

200.00

900.00

02/11/21

## EXHIBIT B

Task & Date	Hours	Rate	Amount
Review and organize actuarial data, review depreciation study, and review dismantlement studies 02/15/21	3.75	200.00	750.00
Review Iowa curve and net salvage analysis and build observed life tables 02/16/21	4.00	200.00	800.00
Review dismantlement study and analysis, and conduct service life and net salvage analysis 02/18/21	4.75	200.00	950.00
Review depreciation study, Iowa curve analysis, and reserve and remaining life calculations 02/23/21	3.00	200.00	600.00
Review dismantlement study and analysis, and conduct service life and net salvage analysis 02/24/21	3.50	200.00	700.00
Review dismantlement study and analysis, and conduct service life and net salvage analysis 02/27/21	2.25	200.00	450.00
Total Hours 46.25		<b>Total</b>	<b>\$9,250.00</b>
		<b>Balance Due</b>	<b>\$9,250.00</b>



***Norwood Energy Consulting, L.L.C.***

P. O. Box 30197  
Austin, Texas 78755-3197  
scott@scottnorwood.com  
(512) 297-1889

Mr. Alfred R. Herrera  
Herrera Law & Associates, PLLC  
4400 Medical Parkway  
Austin, Texas 78756

Date: 2-28-21  
Tax ID #: 26-2374359  
Invoice#: SWPRate FEB21

Re: SWEPCO Base Rate Case Analysis - PUC Docket No. 51415

*SO* ✓

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Statement for professional services rendered 2-1-21 through 2-28-21

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2-02-21	Reviewed SWEPCO RFI responses	4.0 hrs
2-08-21	Reviewed SWEPCO RFIs; worked on follow-up RFIs	5.0 hrs
2-09-21	Drafted RFIs; reviewed SWEPCO testimony	4.5 hrs
2-10-21	Reviewed SWEPCO RFI responses	4.0 hrs
2-11-21	Reviewed RFI responses and testimony; drafted RFIs	6.5 hrs
2-12-21	Reviewed SWEPCO RFI responses on plant viability	6.0 hrs
2-26-21	Reviewed RFI responses; drafted follow-up RFIs	<u>5.5 hrs</u>

Total hours: 35.5 hrs

Total due: 35.5 hours at \$220 per hour = \$7,810

✓

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Thank you for the opportunity to assist with this project.

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# ReSolved Energy Consulting, LLC

11044 Research Blvd, A-420

Austin, TX 78759

EXHIBIT B

82 of 115

## Invoice

DATE	INVOICE NUMBER
3/4/2021	4736

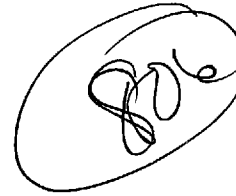
### BILL TO

Herrera Law & Associates, PLLC

Alfred Herrera

4400 Medical Parkway

Austin, Texas 78756



### PROJECT

HL SWEPCO RC 51415

DESCRIPTION	HOURS	RATE	AMOUNT
Consulting (Nalepa)	7.8	270.00	2,106.00
Consulting (Cromleigh)	23	180.00	4,140.00
Total Labor			6,246.00
Work Completed thru - February 28, 2021		<b>TOTAL DUE</b>	<b>\$6,246.00</b>

## Monthly Recap

Karl Nalepa

Date	Task	Hours
February 3, 2021	Review discovery.	0.20
February 8, 2021	Review responses to discovery.	0.50
February 9, 2021	Review schedules and work on analysis.	1.30
February 10, 2021	Prepare and send areas of review to S. Herrera. Work on analysis.	1.00
February 11, 2021	Emails with M. Garrett regarding regulatory asset recovery.	0.20
February 16, 2021	Review responses to discovery.	0.50
February 19, 2021	Review discovery.	0.30
February 23, 2021	Review discovery and responses to discovery.	1.00
February 24, 2021	Review schedules and work on analysis.	0.80
February 25, 2021	Review schedules and work on analysis.	1.30
February 26, 2021	Review discovery and responses to discovery.	0.70
		<b>7.80</b>

## Monthly Recap

Erin Cromleigh

Date	Task	Hours
February 12, 2021	Review application and schedules.	3.30
February 15, 2021	Review application and schedules.	3.10
February 16, 2021	Review application and setup model.	3.20
February 17, 2021	Review application and setup model.	3.40
February 18, 2021	Review application and download discovery files.	3.20
February 19, 2021	Review application and download discovery files.	3.60
February 23, 2021	Review application and setup model.	3.20

**23.00**

**WESTLAW Research**

**February 2021**

<b>Account #</b>	<b>Research Time</b>	<b>X \$65.00/hr.</b>	<b>+ Excluded Charges</b>	<b>Total</b>
■	■	X \$65.00		■
806	1.53	X \$65.00		\$99.45



April 7, 2021

Cities Advocating Reasonable Deregulation  
c/o Jim Finley  
City of Longview  
P.O. Box 1952  
Longview, Texas 75606-1952

**Re: PUC Docket No. 51415; *Application of Southwestern Electric Power Company for Authority to Change Rates*  
Account # 806**

Dear Jim:

Enclosed is our invoice for services provided to the Cities Advocating Reasonable Deregulation regarding the above referenced matter through March, 2021.

Please forward a copy of this invoice to the company.

If I can provide any further explanation about the services provided for you, please call me at (512) 474-1492.

Sincerely,

Alfred R. Herrera

ARH:ll  
Enclosure



**PUC Docket No. 51415,**  
*Application of Southwestern Electric Power Company for the Authority to*  
*Change Rates*

Expense Summary Sheet  
Through March 2021

	<u>Previous</u> <u>Total</u>	<u>March</u>	<u>Cumulative</u> <u>Total</u>
<b>Herrera Law &amp; Associates, PLLC</b>			
Attorney Fees	\$114,843.50	\$49,686.00	\$164,529.50
<b>Expenses:</b>			
Copy Expense		57.10	57.10
Postage Expense			
FedEx Expense			
Fax Expense			
Court Fees			
Delivery Expense			
Research	\$257.40	\$115.70	\$373.10
Outside Copies			
Court Reporter/Transcript			
Travel-Airfare			
Travel Car/Gas/Parking			
Travel – Mileage			
Travel – Hotel			
Norwood Energy Consulting	\$26,620.00	\$9,790.00	\$36,410.00
ReSolved Energy Consulting	\$15,687.00	\$12,510.00	\$28,197.00
Garrett Group, Inc.	\$43,275.00	\$33,800.00	\$77,075.00
Resolve Utility Consulting	\$30,550.00	\$11,750.00	\$42,300.00
J. Randall Woolridge	\$28,927.50	\$4,132.50	\$33,060.00
<b>Total</b>	<b>260,160.40</b>	<b>\$121,841.30</b>	<b>\$382,001.70</b>
<b>Amount received</b>			<b><u>(\$0.00)</u></b>
<b>Credit</b>			<b><u>(\$776.00)</u></b>
<b>Balance</b>			<b>\$381,225.70</b>

**Herrera Law & Associates, PLLC**  
**PO Box 302799**  
**Austin, TX 78703**  
**512-474-1492**

**April 6, 2021**

*Invoice submitted to:*

**Cities Advocating Reasonable Deregulation**

**c/o Jim Finley**

**City of Longview**

**P.O. Box 1952**

**Longview, TX 75606-1952**

*In Reference To:*

*Application of Southwestern  
Electric Power Company for  
Authority to Change Rates  
PUC DN 51415  
Acct #806*

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**STATEMENT FOR PROFESSIONAL SERVICES**

**Legal Fees:**

		<u>Hrs/Rate</u>	<u>Amount</u>
03/01/21	Sergio E. Herrera - Continued review of Company's prefiled direct	2.90 250.00/hr	725.00
	Alfred R. Herrera - Review ETEC/NTEC 2nd RFIs to SWEPCO (variety of topics re: rev req and cost allocation)	0.40 485.00/hr	194.00
	Alfred R. Herrera - Review SWEPCO response to Staff 11th (vegetation management/Seidel)	0.60 485.00/hr	291.00
	Brennan Foley - Review Staff RFIs re: CA/RD (0.1), ETEC RFIs re: CA/RD (0.1); TIEC RFIs re: generation (0.2); responses to CARD RFIs re: generation (1.0)	1.40 350.00/hr	490.00

*Cities Advocating Reasonable Deregulation*

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		<u>Hrs/Rate</u>	<u>Amount</u>
03/01/21	Leslie Lindsey - Reviewed and updated case file	0.10 145.00/hr	14.50
03/02/21	Sergio E. Herrera - Reviewed Direct testimony RE: Cost Allocation	3.20 250.00/hr	800.00
	Sergio E. Herrera - Reviewed updated discovery	1.10 250.00/hr	275.00
	Alfred R. Herrera - Review SWEPCO response to Staff 13th RFIs (ad valorem taxes/Baird)	0.30 485.00/hr	145.50
	Alfred R. Herrera - Review SWEPCO response to CARD 7th RFIs (plant capacity & retirements and purchased power and cost of production, including Ancillary Svcs/Brice; McMahon; Mertz; Baird) and Supp Resp to CARD 2nd RFIs (econ studies of operating gen units & jurisdictional allocation of Distribn Accts/Brice/McMahon)	1.60 485.00/hr	776.00
	Leslie Lindsey - update file disburse RFI responses to consultants	0.10 145.00/hr	14.50
03/03/21	Alfred R. Herrera - Review Nucor's 4th RFIs to SWEPCO (cost allocation/relative rates of return)	0.90 485.00/hr	436.50
	Alfred R. Herrera - Review SWEPCO response to Staff 12th RFIs (incentive comp/outside services/Dolet Hills impact/Baird; Carlin; Seidel)	0.70 485.00/hr	339.50
	Brennan Foley - Review Nucor RFIs re: CA/RD (0.1) and ETSWD RFIs re: CA/RD (0.1) and responses to Staff RFIs re: taxes (0.1)	0.30 350.00/hr	105.00
	Brennan Foley - Conduct research and discuss issues re: generation with A. Herrera and S. Herrera	1.00 350.00/hr	350.00
	Mariann Wood - Reviewed filings on PUC Interchange and updated case file: Updated discovery spreadsheet	1.50 145.00/hr	217.50

*Cities Advocating Reasonable Deregulation*

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		<u>Hrs/Rate</u>	<u>Amount</u>
03/04/21	Alfred R. Herrera - Review ETSWD Co.'s 3rd RFIs to SWEPCO (cost allocation/biling determinants)	0.40 485.00/hr	194.00
	Alfred R. Herrera - Review SWEPCO response to TIEC 7th RFIs (cost allocation (Aaron/Hawkins/Baird) and reg asset (Welsh 2) and incent comp / Baird)	0.90 485.00/hr	436.50
	Brennan Foley - Correspond with S. Norwood re: RFI responses re: generation issues	0.50 350.00/hr	175.00
	Leslie Lindsey - update file disburse RFI responses to consultants	0.10 145.00/hr	14.50
03/05/21	Brennan Foley - Coordinate with L. Lindsey re: CARD's RCE invoicesq	1.00 350.00/hr	350.00
	Mariann Wood - Reviewed filings on PUC Interchange and updated case file: Updated discovery spreadsheet	1.00 145.00/hr	145.00
03/07/21	Mariann Wood - Reviewed filings on PUC Interchange and updated case file: Updated discovery spreadsheet	2.10 145.00/hr	304.50
03/08/21	Alfred R. Herrera - Review Eastman Chem Co's 1st RFIs to SWEPCO, Nucor's 5th RFI to SWEPCO, and SWEPCO's Resp to Staff 9th RFIs (variety of topics including rate base, O&M, taxes, NOLs / Hodgson; Frantz; Baird)	1.40 485.00/hr	679.00
	Brennan Foley - Prepare RFIs re: incentive comp. (0.1) and generation issues (0.2)	0.30 350.00/hr	105.00
	Mariann Wood - Reviewed filings on PUC Interchange and updated case file: Updated discovery spreadsheet	1.00 145.00/hr	145.00
	Leslie Lindsey - Prepare, format, file and serve on all parties AXM's 9th Set of RFIs to SPS	0.50 145.00/hr	72.50
	Leslie Lindsey - Prepare, format, file and serve on all parties AXM's 10th Set of RFIs to SPS	0.40 145.00/hr	58.00

*Cities Advocating Reasonable Deregulation*

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		<u>Hrs/Rate</u>	<u>Amount</u>
03/08/21	Leslie Lindsey - update file disburse RFI responses to consultants	0.10 145.00/hr	14.50
03/09/21	Alfred R. Herrera - Review ETSWD Co's 4th RFIs to SWEPCO, Sierra Club's 5th RFI to SWEPCO, and Staff 15th RFIs to SWEPCO	1.30 485.00/hr	630.50
	Brennan Foley - Prepare RFIs re: CA/RD (0.2) and generation (0.2)	0.40 350.00/hr	140.00
	Brennan Foley - Correspond with A. Herrera re: CARD's RCEs	0.40 350.00/hr	140.00
	Leslie Lindsey - Prepare, format, file and serve on all parties AXM's 11th Set of RFIs to SPS	0.40 145.00/hr	58.00
	Leslie Lindsey - Prepare, format, file and serve on all parties AXM's 12th Set of RFIs to SPS	0.40 145.00/hr	58.00
03/10/21	Alfred R. Herrera - Review ETSWD Co's 5th RFIs to SWEPCO and OPUC's 10th RFI to SWEPCO	0.70 485.00/hr	339.50
	Mariann Wood - Reviewed filings on PUC Interchange and updated case file: Updated discovery spreadsheet	1.30 145.00/hr	188.50
03/11/21	Sergio E. Herrera - Drafted RCE Exhibit for RCE Testimony	1.30 250.00/hr	325.00
	Sergio E. Herrera - Prepared RCE Exhibit for K. Webking Testimony	2.50 250.00/hr	625.00
	Alfred R. Herrera - Review SWEPCO Resp to CARD 8th RFI (payroll / Baird) and OPUC's 10th RFI (taxes / Hodgson)	1.60 485.00/hr	776.00
	Brennan Foley - Prepare spreadsheet re: CARD's RCEs	2.00 350.00/hr	700.00

*Cities Advocating Reasonable Deregulation*

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		<u>Hrs/Rate</u>	<u>Amount</u>
03/12/21	Brennan Foley - Coordinate with L. Lindsey and consultants re: CARD's RCEs	0.50 350.00/hr	175.00
	Brennan Foley - Conduct research re: cost of capital issues	1.30 350.00/hr	455.00
	Mariann Wood - Reviewed filings on PUC Interchange and updated case file: Updated discovery spreadsheet	1.30 145.00/hr	188.50
	Leslie Lindsey - Reviewed and updated case file	0.10 145.00/hr	14.50
	Leslie Lindsey - Prepare invoices and spreadsheet related to ARH affidavit for Webking testimony	1.60 145.00/hr	232.00
03/13/21	Alfred R. Herrera - Review SWEPCO Resp to ETEC/NTEC's 1st RFI (various accounting issues / Baird/Hawkins/Cash) and Sierra Club's 2nd RFI (valuation/analysis of coal plants vs. alternatives including capital costs and O&M & retirements / Baird; McMahon; Cash; Mertz; Brice; Jeffries; Aaron)	2.30 485.00/hr	1,115.50
03/15/21	Alfred R. Herrera - Review SWEPCO Resp to Sierra Club's 3rd RFI (valuation/analysis of coal plants vs. alternatives including capital costs and O&M and pricing of alternate energy/power / Baird; McMahon/Brice)	1.40 485.00/hr	679.00
	Brennan Foley - Prepare spreadsheet re: CARD's RCEs	1.50 350.00/hr	525.00
	Brennan Foley - Correspond with M. Garrett re: RFI responses	0.30 350.00/hr	105.00
03/16/21	Mariann Wood - Reviewed filings on PUC Interchange and updated case file: Updated discovery spreadsheet	1.40 145.00/hr	203.00
03/17/21	Brennan Foley - Coordinate with A. Herrera and L. Lindsey re: CARD's RCEs and prepare RCE exhibits	2.00 350.00/hr	700.00

*Cities Advocating Reasonable Deregulation*

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		<u>Hrs/Rate</u>	<u>Amount</u>
03/17/21	Leslie Lindsey - Continue research and preparing attachments to ARH affidavit	0.50 145.00/hr	72.50
03/18/21	Alfred R. Herrera - Review SWEPCO Resp to TIEC 9th RFI (imputed/accredited capacity re: wind sources / Mertz)	0.80 485.00/hr	388.00
	Alfred R. Herrera - Review SWEPCO response to Sierra Club's 4th RFI	0.40 485.00/hr	194.00
	Alfred R. Herrera - Review SWEPCO response to TIEC's 10th RFI	0.20 485.00/hr	97.00
	Brennan Foley - Review responses to TIEC RFIs re: generation (0.1); responses to OPUC RFIs re: generation (0.2); responses to Sierra Club RFIs re: generation (0.2) responses to OPUC RFIs re: accounting (0.2); responses to ETEC RFIs re: generation, accounting and depreciation (0.2); responses to CARD RFIs re: payroll (0.3); TIEC responses to SPS RFIs (0.2); TIEC RFIs re: CA/RD (0.1); multiple ETSWD RFIs re: CA/RD (0.2); Eastman RFIs re: CA/RD (0.1); Sierra Club RFIs re: generation (0.1); OPUC RFIs re: depreciation (0.1)	2.00 350.00/hr	700.00
	Brennan Foley - Coordinate with A. Herrera and L. Lindsey re: CARD's RCEs and prepare RCE exhibits	0.50 350.00/hr	175.00
	Mariann Wood - Reviewed filings on PUC Interchange and updated case file: Updated discovery spreadsheet	0.70 145.00/hr	101.50
	Leslie Lindsey - Continue preparing invoices, spreadsheet and affidavit of ARH	2.30 145.00/hr	333.50
03/19/21	Brennan Foley - Correspond with M. Garrett re: PUC rate case filing requirements	0.30 350.00/hr	105.00
	Brennan Foley - Coordinate with A. Herrera and L. Lindsey re: CARD's RCEs and prepare RCE exhibits	0.50 350.00/hr	175.00

*Cities Advocating Reasonable Deregulation*

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		<u>Hrs/Rate</u>	<u>Amount</u>
03/19/21	Leslie Lindsey - Continue preparing invoices, spreadsheet and affidavit of ARH	0.90 145.00/hr	130.50
03/21/21	Alfred R. Herrera - Begin preliminary review of other intervenor revenue requirement testimonies	1.60 485.00/hr	776.00
	Brennan Foley - Prepare RCE exhibits and correspond with C. Webking re: RCE testimony	1.00 350.00/hr	350.00
	Mariann Wood - Reviewed filings on PUC Interchange and updated case file	0.30 145.00/hr	43.50
03/22/21	Alfred R. Herrera - Review J.R. Woolridge draft testimony	5.10 485.00/hr	2,473.50
	Brennan Foley - Review and revise R. Woolridge direct testimony	0.70 350.00/hr	245.00
	Brennan Foley - Review TIEC RFIs re: SPP (0.1); Sierra Club RFIs re: generation (0.1); responses to TIEC RFIs re: cost of capital (0.1)	0.30 350.00/hr	105.00
	Leslie Lindsey - Continue preparing invoices, spreadsheet and affidavit of ARH	1.10 145.00/hr	159.50
03/23/21	Alfred R. Herrera - Continue review of J.R. Woolridge draft testimony	2.60 485.00/hr	1,261.00
	Brennan Foley - Prepare RCE exhibits and correspond with C. Webking re: RCE testimony	3.00 350.00/hr	1,050.00
	Brennan Foley - Assess consultant preliminary accounting adjustments; review and revise M. Garrett direct testimony	1.00 350.00/hr	350.00
	Brennan Foley - Call with R. Asher re: RCE procedural issues and correspond with A. Herrera re: same	0.40 350.00/hr	140.00



*Cities Advocating Reasonable Deregulation*

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		<u>Hrs/Rate</u>	<u>Amount</u>
03/23/21	Mariann Wood - Reviewed filings on PUC Interchange and updated case file: Updated discovery spreadsheet	1.20 145.00/hr	174.00
	Leslie Lindsey - Continue preparation of ARH affidavit, and related supporting documentation	1.70 145.00/hr	246.50
03/24/21	Sergio E. Herrera - Reviewed and edited S. Norwood Direct	2.50 250.00/hr	625.00
	Sergio E. Herrera - Reviewed relied upon testimony and sources RE CARD Direct	2.30 250.00/hr	575.00
	Alfred R. Herrera - Continue review of J.R. Woolridge draft testimony	4.30 485.00/hr	2,085.50
	Alfred R. Herrera - Review SWEPCO Resp to Staff 14th RFI (cost allocation / Jackson); ETEC/NTEC 2nd RFI ( variety of topics re: rev req and cost allocation / Baird; Aaron); Nucor 4th RFI (cost allocation/rate design / Jackson); and ETSWD Co's 3rd RFI (cost allocation/rate design / Jackson; Burnet)	1.30 485.00/hr	630.50
	Brennan Foley - Review and revise M. Garrett testimony	3.30 350.00/hr	1,155.00
	Brennan Foley - Review and revise D. Garrett testimony	1.10 350.00/hr	385.00
	Brennan Foley - Review and revise S. Norwood testimony	0.50 350.00/hr	175.00
	Brennan Foley - Prepare RCE exhibits	0.90 350.00/hr	315.00
	Mariann Wood - Prepared Direct Testimony & Exhibits of David Garrett	3.20 145.00/hr	464.00
	Leslie Lindsey - Continue preparation of ARH affidavit, and related supporting documentation	2.10 145.00/hr	304.50

*Cities Advocating Reasonable Deregulation*

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		<u>Hrs/Rate</u>	<u>Amount</u>
03/25/21	Sergio E. Herrera - Reviewed D. Garrett Direct	1.60 250.00/hr	400.00
	Sergio E. Herrera - Reviewed R. Woolridge Direct	2.90 250.00/hr	725.00
	Alfred R. Herrera - Review of J.R. Woolridge final draft testimony	1.10 485.00/hr	533.50
	Alfred R. Herrera - Review of M. Garrett final draft testimony	0.60 485.00/hr	291.00
	Alfred R. Herrera - Review of D. Garrett final draft testimony	0.70 485.00/hr	339.50
	Alfred R. Herrera - Review of S. Norwood final draft testimony	0.40 485.00/hr	194.00
	Alfred R. Herrera - Review underlying data re: RCEs and prepare draft ARH affidavit re: RCEs	2.40 485.00/hr	1,164.00
	Brennan Foley - Review SWEPCO schedules re: revenue distribution	0.40 350.00/hr	140.00
	Brennan Foley - Correspond with R. Asher re: procedural schedule issues	0.20 350.00/hr	70.00
	Brennan Foley - Coordinate with A. Herrera and L.Lindsey re: CARD's RCE exhibits	0.50 350.00/hr	175.00
	Brennan Foley - Revise M. Garrett draft testimony	1.00 350.00/hr	350.00
	Mariann Wood - Prepared Direct Testimony & Exhibits of Mark Garrett	3.10 145.00/hr	449.50
	Brennan Foley - Revise M. Garrett draft testimony	1.00 350.00/hr	350.00

*Cities Advocating Reasonable Deregulation*

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		<u>Hrs/Rate</u>	<u>Amount</u>
03/26/21	Sergio E. Herrera - Reviewed and edited final draft S. Norwood Direct	1.00 250.00/hr	250.00
	Sergio E. Herrera - Reviewed and edited S. Norwood Attachments/WPs RE Direct	1.10 250.00/hr	275.00
	Sergio E. Herrera - Communicated with CARD team RE: HS/Confidential treatment in direct	0.30 250.00/hr	75.00
	Sergio E. Herrera - Reviewed and edited K. Nalepa Direct	1.10 250.00/hr	275.00
	Alfred R. Herrera - Prepare final draft of ARH Affidavit re: RCEs	0.70 485.00/hr	339.50
	Brennan Foley - Prepare CARD's RCE exhibits	1.00 350.00/hr	350.00
	Brennan Foley - Review R. Woolridge and S. Norwood testimony	1.50 350.00/hr	525.00
	Mariann Wood - Prepared Direct Testimony & Exhibits of Mark Garrett; Prepared Direct Testimony & Exhibits of Scott Norwood	4.80 145.00/hr	696.00
	Brennan Foley - Review R. Woolridge and S. Norwood testimony	1.00 350.00/hr	350.00
03/27/21	Mariann Wood - Prepared Direct Testimony & Exhibits of J. Randall Woolridge	2.50 145.00/hr	362.50
03/28/21	Sergio E. Herrera - Communicated with CARD team RE: direct testimonies	1.50 250.00/hr	375.00
	Brennan Foley - Review and revise K. Nalepa direct testimony	0.40 350.00/hr	140.00

*Cities Advocating Reasonable Deregulation*

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		<u>Hrs/Rate</u>	<u>Amount</u>
03/28/21	Mariann Wood - Prepared Direct Testimony & Exhibits of J. Randall Woolridge; Prepared Direct Testimony & Exhibits of Scott Norwood; Prepared Direct Testimony of Karl Nalepa	6.10 145.00/hr	884.50
03/29/21	Sergio E. Herrera - Reviewed and edited K. Webking testimony	0.50 250.00/hr	125.00
	Sergio E. Herrera - Reviewed and edited K. Nalepa Direct and COS Model testimony	0.90 250.00/hr	225.00
	Alfred R. Herrera - Final review/overview of CARD's direct testimonies	1.60 485.00/hr	776.00
	Alfred R. Herrera - Review SWEPCO Resp to CARD 9th RFI (variety of rev req issues/plant additions/retirements / McMahon; Baird; Smith); Eastman Chem Co's 1st RFI (cost allocation / Aaron); ETSWD Co. 4th RFI (cost allocation/ OATT revenue / Brice; Aaron; Coffey; Jackson); TIEC 11th RFI (cost allocation)	2.10 485.00/hr	1,018.50
	Brennan Foley - Review and revise C. Webking testimony and attachments	1.80 350.00/hr	630.00
	Mariann Wood - Reviewed and updated case file; Updated discovery spreadsheet; Prepared Direct Testimony of Karl Nalepa	4.60 145.00/hr	667.00
	Leslie Lindsey - Prepare, format, and assemble ARH signed Affidavit and attachments for C. Webking Testimony	2.10 145.00/hr	304.50
03/30/21	Alfred R. Herrera - Review SWEPCO Resp to CARD 10th ( rev req/AEPSC-Baird; Frantz)) & 11th RFIs (cost allocation/rate design/billing determinants / Burnett; Jackson)	0.80 485.00/hr	388.00
	Brennan Foley - Prepare C. Webking testimony and attachments	0.50 350.00/hr	175.00
	Leslie Lindsey - Prepare, format Direct Testimony of Cathrine Webking	1.30 145.00/hr	188.50

*Cities Advocating Reasonable Deregulation*

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		<u>Hrs/Rate</u>	<u>Amount</u>
03/30/21	Leslie Lindsey - Prepare Norwood's HSPM envelopes for filing	0.80 145.00/hr	116.00
03/31/21	Brennan Foley - Review RFI responses re: generation	0.40 350.00/hr	140.00
	Brennan Foley - Review intervenor direct testimony	4.00 350.00/hr	1,400.00
	Mariann Wood - Reviewed and updated case file; Updated discovery spreadsheet	0.50 145.00/hr	72.50
	Leslie Lindsey - Prepare, file and serve direct testimony, attachments, and workpapers of Norwood, Nalepa, Woolridge, D.Garrett, and M.Garrett; Burn CD's containing worpapers	4.00 145.00/hr	580.00
<b>Total Legal Fees:</b>		<b>167.20</b>	<b>\$49,686.00</b>
<b>Expenses :</b>			
03/01/21	Copy expense for the month of March 2021		57.10
	Consultant Invoice - Garrett Group Consulting, Inc.		33,800.00
	Consultant Invoice - Norwood Energy Consulting, LLC Inv #SWPRate MAR21		9,790.00
	Consultant Invoice - Resolve Utility Consulting, PLLC Inv #000411		11,750.00
	Consultant Invoice - ReSolved Energy Consulting Inv #4747		12,510.00
	Research on Westlaw for the month of March 2021		115.70
03/15/21	Consultant Invoice - J. Randall Woolridge Second Billing invoice		4,132.50
<b>Total expenses:</b>			<b>\$72,155.30</b>
<b>TOTAL AMOUNT OF THIS BILL:</b>			<b>\$121,841.30</b>

*Cities Advocating Reasonable Deregulation*

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	<u>Amount</u>
<b>Previous balance</b>	<b>\$259,384.40</b>
<b>BALANCE DUE</b>	<b><u>\$381,225.70</u></b>

Copier Account Totals  
MARCH 2021

Account	Printouts	per copy	Total
████	████	X .10	████
806	571	X .10	\$57.10

**GARRETT GROUP CONSULTING, INC.**  
 4028 OAKDALE FARM CIRCLE  
 EDMOND, OK 73013

TELEPHONE (405) 239-2226

E-MAIL [MGARRETT@GARRETTGROUPLLC.COM](mailto:MGARRETT@GARRETTGROUPLLC.COM)

April 2, 2021

Alfred R. Herrera  
 Herrera Law & Associates, PLLC  
 816 Congress Avenue, Suite 950  
 Austin, Texas 78701

**RE: SWEPCO 2020 Rate Case; Docket No. PUC 51415**

Dear Freddie:

Our invoice for professional services in March of 2021 in connection with the above-referenced case follows:

**I. Professional Services:**

A.	Mark Garrett JD, CPA – 78 hours at \$250.00 per hour (Details in Attachment A)	\$19,500.00
B.	Ed Farrar CPA – 64 hours at \$150.00 per hour (Details in Attachment B)	\$9,600.00
C.	Heather Garrett JD, CPA – 16 hours at \$200.00 per hour (Details in Attachment C)	\$3,200.00
D.	Garry Garrett – 12 hours at \$125.00 per hour (Details in Attachment D)	\$1,500.00

**II. Expenses:**

Office Expenses	<u>N/C</u>
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<b>III. Total This Invoice:</b>	<b>\$33,800.00</b>
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We appreciate the opportunity to work with you on this case. Please call me if you have any questions.

Sincerely,

Mark E. Garrett  
 Attachments



Attachment A

Consulting Tasks for SWEPPO 2020 Rate Case  
Docket No. PUC 51415

(Mark Garrett)

March 2021 – 78.0 Hours

Date	Task	Hours
March 2	Review testimony, exhibits, and discovery responses	3.0
March 4	Review testimony, exhibits, and discovery responses	4.0
March 5	Review annual incentive adjustment, update adjustment	2.0
March 8	Review Dolet Hills issues, perform analysis	2.0
March 9	Review EDIT discovery, perform analysis	1.5
March 10	Review discovery payroll issues, update exhibits & testimony	2.5
March 11	Review testimony and work papers, perform analysis - vegetation management	2.0
March 12	Perform analysis and draft testimony on incentive compensation	1.5
March 13	Review discovery, perform analysis on payroll and benefits	2.5
March 15	Perform analysis on Dolet Hills issues and EDIT	2.0
March 16	Perform analysis on insurance reserve	6.0
March 17	Continue analysis on payroll expense and benefits	5.0
March 18	Work on draft testimony and exhibits	8.0
March 19	Work on draft testimony and exhibits	8.0
March 20	Work on draft testimony and exhibits	5.0
March 21	Work on draft testimony and exhibits	4.0
March 22	Work on draft testimony and exhibits	8.0
March 23	Work on draft testimony and exhibits	7.0
March 24	Review and finalize testimony and exhibits	4.0
Total		78.0

**Attachment B**

Consulting Tasks for SWEPCCO 2020 Rate Case  
Docket No. PUC 51415

(Edwin Farrar)

March 2021 – 64.0 Hours

Date	Task	Hours
March 1	Review testimony, exhibits, and discovery on ADIT	2.0
March 2	Review testimony, exhibits, and discovery on ADIT	1.0
March 3	Review testimony, exhibits, and discovery on Dolet Hills	5.0
March 4	Review testimony, exhibits, and discovery on Dolet Hills	1.0
March 8	Review annual incentive adjustment, update adjustment	4.5
March 9	Review Dolet Hills issues, perform analysis	3.5
March 12	Review EDIT discovery, perform analysis	1.0
March 13	Review discovery payroll issues, update exhibits & testimony	6.0
March 14	Review testimony and work papers, perform analysis - vegetation management	8.0
March 15	Perform analysis and draft testimony on incentive compensation	5.0
March 16	Review discovery, perform analysis on payroll and EDIT	6.0
March 17	Draft testimony on vegetation management and self-insurance	7.0
March 18	Perform analysis on Dolet Hills issues	0.5
March 19	Perform analysis on payroll expense	2.0
March 20	Perform analysis and draft testimony on payroll expense	2.0
March 22	Perform analysis on depreciation expense	5.0
March 23	Review exhibits	2.0
March 30	Review discovery response, perform analysis	2.0
March 31	Review discovery response	0.5
<b>Total</b>		<b>64.0</b>

**Attachment C**

**Consulting Tasks for SWEPCO 2020 Rate Case**  
*Docket No. PUC 51415*

*(Heather Garrett)*

**March 2021 – 16.0 Hours**

<b>Date</b>	<b>Task</b>	<b>Hours</b>
21	Review and revise testimony and exhibits	4.5
22	Review and revise testimony and exhibits	6.0
23	Continue work on testimony and exhibits	4.0
24	Final edits of testimony and exhibits	1.5
<b>Total</b>		<b>16.0</b>

**Attachment D**

**Consulting Tasks for SWEPKO 2020 Rate Case**  
*Docket No. PUC 51415*

*(Garry Garrett)*

**March 2021 – 12.0 Hours**

Date	Task	Hours
4	Manage discovery; research and analysis	4.0
8	Manage discovery; research and analysis	4.0
9	Manage discovery; research and analysis	2.0
10	Manage discovery; research and analysis	2.0
<b>Total</b>		<b>12.0</b>