



Control Number: 52199



Item Number: 1

Addendum StartPage: 0

PUC DOCKET NO. **52199**

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



**AEP TEXAS INC.'S APPLICATION**

**JUNE 1, 2021**

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**Excel files provided electronically on the PUC Interchange**

AEP Texas Central Division Schedule K.xls  
 AEP Texas North Division Schedule K.xls  
 AEP TX Schedule A Page 2.xlsx  
 AEP TX Combined 2021 SchC-E-G-H-I-Q-WPA-WPC-WPE-WPG 2022 Rates.xlsx  
 Central Division 2021 SchC-E-G-H-I-Q-WPA-WPC-WPE-WPG 2022 Rates.xlsx  
 Central Division Schedule B-1 Page 2.xlsx  
 EXHIBIT BTL-1.xls  
 EXHIBIT BTL-2.xls  
 EXHIBIT BTL-3.xls  
 EXHIBIT BTL-4.xls  
 North Division 2021 SchC-E-G-H-I-Q-WPA-WPC-WPE-WPG 2022 Rates.xlsx  
 North Division Schedule B Page 2.xlsx  
 AEP Texas 2022 EECRF Sch A-B-J-K-M-N-O-P-R draft.xlsx

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<b>APPLICATION OF AEP TEXAS INC. TO ADJUST ENERGY EFFICIENCY COST RECOVERY FACTOR AND RELATED RELIEF</b>	<b>§ § § §</b>	<b>PUBLIC UTILITY COMMISSION  OF TEXAS</b>
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**AEP TEXAS INC.'S APPLICATION**

AEP Texas Inc. (AEP Texas) files this Application to Adjust Energy Efficiency Cost Recovery Factor and Related Relief in accordance with Public Utility Regulatory Act<sup>1</sup> (PURA) § 39.905 and 16 Tex. Admin. Code (TAC) §§ 25.181-.182. In support of its application, AEP Texas shows the following:

**I. Applicant**

AEP Texas is a public utility as that term is defined in PURA § 11.004(1), an electric utility as that term is defined in PURA § 31.002(6), and a transmission and distribution utility as that term is defined in PURA § 31.002(19). AEP Texas provides transmission and distribution service across a service territory covering all or part of 92 counties in south and west Texas. AEP Texas' business address is 539 North Carancahua Street, Corpus Christi, Texas 78401.

**II. Jurisdiction**

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

**III. Applicant's Authorized Representatives**

AEP Texas' authorized business representative is:

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

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<sup>1</sup> PURA is codified at Tex. Util. Code Ann. §§ 11.001-66.016.

AEP Texas' authorized legal representatives are:

Leila Melhem  
American Electric Power Service Corporation  
400 West 15<sup>th</sup> Street, Suite 1520  
Austin, Texas 78701  
512.481.3320 (voice)  
512.481.4591 (facsimile)  
Email: [lmelhem@aep.com](mailto:lmelhem@aep.com)

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

AEP Texas requests that all pleadings and other documents filed in this proceeding be served on each of the persons above and be emailed to [aepaustintx@aep.com](mailto:aepaustintx@aep.com).

#### **IV. Affected Persons**

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

#### **V. Background**

PURA § 39.905 and 16 TAC § 25.182 authorize utilities to establish an EECRF to timely recover the reasonable costs of providing a portfolio of cost-effective energy efficiency programs. In Docket No. 50892, AEP Texas' most recent EECRF proceeding, the Commission approved a total energy-efficiency revenue requirement for AEP Texas of \$20,431,462. AEP Texas' approved EECRF for the 2021 program year included the following:

- forecasted energy-efficiency program costs of \$17,647,659 in program year 2021;
- projected Evaluation, Measurement, and Verification (EM&V) expenses in the amount of \$211,988 for the evaluation of program year 2020;
- an adjustment of \$948,163 for AEP Texas' net over-recovery, including interest, of program year 2019 energy-efficiency costs;

- a performance bonus of \$3,475,676 for AEP Texas' 2019 energy efficiency results; and
- rate-case expenses incurred in Docket No. 49592 in the amounts of \$35,404 for AEP Texas and \$8,899 for municipalities.<sup>2</sup>

In Docket No. 49494, the Commission approved AEP Texas' request to consolidate its divisional rates and tariffs and for removal of energy-efficiency costs from its base rates, effectively authorizing AEP Texas to transition from base-rate, divisional recovery of energy-efficiency costs to consolidated recover under a single, combined EECRF.<sup>3</sup> Although AEP Texas no longer recovers energy efficiency costs in base rates, a trailing transition exists based on the Final Order from Docket No. 49494. In particular, the 2020 budget year true-up includes base rate amounts through May 2020—i.e., before energy efficiency costs were removed from base rates with the approval of the Docket No. 49494 compliance rates in June 2020. Consequently, the recognition of 2020 base-rate revenues is necessary to evaluate the 2020 over/under recovery amount to be included in the proposed 2022 AEP Texas Rider EECRF presented below.

## **VI. Request to Adjust the EECRF**

AEP Texas requests the authority to update its EECRF to collect \$27,021,197 in 2022 to reflect the following five components:

- forecasted energy-efficiency program costs of \$17,747,658 for program year 2022;
- EM&V expenses of \$211,359 for the evaluation of program year 2021;
- an adjustment of \$351,084 to account for the under-recovery of actual energy efficiency costs for 2020 (includes interest and recovery of 2019 EM&V costs);
- recovery of \$8,673,275 representing AEP Texas' earned performance bonus for achieving demand and energy savings that exceeded its minimum goals to be achieved in 2020; and
- recovery of \$26,739 representing 2020 EECRF proceeding expenses incurred in Docket No. 50892 by AEP Texas and of \$11,083 representing 2020 EECRF

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<sup>2</sup> *Application of AEP Texas, Inc. to Adjust its Energy Efficiency Cost Recovery Factors and Related Relief*, Docket No. 50892, Final Order at Ordering Paragraph No. 2 (Sept. 24, 2020).

<sup>3</sup> *Application of AEP Texas, Inc. for Authority to Change Rates*, Docket No. 49494, Final Order, at Findings of Fact 83 and 98, and Conclusions of Law 11 and 19 (Apr. 3, 2020).

proceeding expenses incurred in Docket No. 50892 by municipalities as authorized by 16 TAC § 25.182(d)(3)(B).

**VII. Adjusted EECRF Cost Recovery Factors for 2022**

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

AEP Texas		
Rate Class	Proposed kWh Factor	Billing Unit Per Rate
Residential	\$0.001205	kWh
Secondary <= 10kW	\$0.001045	kWh
Secondary > 10 kW	\$0.001146	kWh
Primary	\$0.000257	kWh
Transmission	\$0.000323	kW

The adjusted Rider EECRF containing these cost recovery factors for 2022 is provided as Attachment A to this application.

**VIII. Testimony and Schedules Supporting Adjusted 2022 EECRF**

Accompanying this application are the direct testimonies of Robert Cavazos, Pamela D. Osterloh, Brian T. Lysiak, and Jennifer L. Jackson; Schedules A through S, which support the relief sought by Applicant; and workpapers supporting the testimony and schedules. The evidence sponsored by Mr. Cavazos, Ms. Osterloh, Mr. Lysiak, and Ms. Jackson fully supports the relief sought by AEP Texas for 2022 pursuant to PURA § 39.905 and 16 TAC § 25.182.

**IX. Request for Protective Order**

Schedule J contains a listing of all Energy Efficiency Service Providers (EESPs) who received incentive funds and a listing of EESPs who received more than five percent of incentive funds for 2020 along with their contracts with AEP Texas. In accordance with 16 TAC § 25.182(d)(10)(H) and (K), such information may be treated as confidential. Accordingly, AEP Texas requests entry of the Commission's standard Protective Order provided as Attachment B to this application.

**X. Notice**

In accordance with 16 TAC § 25.182(d)(13), AEP Texas proposes to provide notice within seven days of the filing date by providing a copy of this application by U.S. mail, postage prepaid,

to all parties to AEP Texas' most recently completed base-rate case (Docket No. 49494), AEP Texas' last EECRF case (Docket No. 50892), the Texas Department of Housing and Community Affairs, and all REPs in Texas. In addition, AEP Texas will provide a copy of this application by email to these parties in accordance with the Second Order Suspending Rules issued in Project No. 50664. Consistent with 16 TAC § 25.182(d)(14), AEP Texas will file an affidavit attesting to the completion of notice within 14 days after the application is filed.

#### **XI. Proposed Schedule**

AEP Texas proposes the following schedule for this proceeding:

Notice Completed	June 8, 2021
Proof of Notice	June 15, 2021
Intervention Deadline	July 6, 2021
Request for a Hearing	July 6, 2021
	<b><u>If No Hearing Requested</u></b>
Staff Recommendation	July 21, 2021
Parties' Proposed Order	July 28, 2021
	<b><u>If Hearing Requested</u></b>
End of discovery on AEP Texas Direct	July 6, 2021
Deadline for Intervenor Direct	July 7, 2021
Objections to AEP Texas and Intervenor Direct	July 14, 2021
Deadline for Staff Direct	July 14, 2021
End of Discovery on Intervenor Direct	July 14, 2021
End of Discovery on Staff Direct	July 21, 2021
Replies to Objections to AEP Texas and Intervenor Direct	July 21, 2021
Objections to Staff Direct	July 21, 2021
Discovery Responses on Intervenor Direct	July 21, 2021
Deadline for AEP Texas Rebuttal and Cross-Rebuttal	July 26, 2021
Discovery Responses on Staff Direct	July 26, 2021
Hearing on the Merits	Aug. 10, 2021



## **XII. Conclusion and Prayer for Relief**

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

- a. approve AEP Texas' proposed notice and method of providing notice;
- b. enter the Commission's standard protective order;
- c. approve AEP Texas' proposed procedural schedule;
- d. approve AEP Texas' proposed Rider EECRF and authorize AEP Texas to begin applying the adjusted Rider EECRF as of March 1, 2022; and
- e. grant AEP Texas any other relief to which it is justly entitled.

Dated: June 1, 2021

RESPECTFULLY SUBMITTED,

Leila Melhem  
400 West 15<sup>th</sup> Street, Suite 1520  
Austin, Texas 78701  
State Bar No. 24083492  
Email: [lmelhem@aep.com](mailto:lmelhem@aep.com)  
**AMERICAN ELECTRIC POWER SERVICE  
CORPORATION**

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

By: /s/ Patrick Pearsall  
Patrick Pearsall

**ATTORNEYS FOR AEP TEXAS INC.**

Applicable: Certified Service Area

Chapter: 6 Section: 6.1.1

Section Title: Delivery System Charges

Revision: Second Effective Date: March 1, 2022

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#### **6.1.1.4.2 Rider EECRF – Energy Efficiency Cost Recovery Factors**

##### **AVAILABILITY**

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

##### **APPLICABILITY**

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

##### **MONTHLY RATE**

<u>Rate Schedule</u>	<u>Factor</u>	
Residential Service	\$0.001205 per kWh	I
Secondary Service Less than or Equal to 10 kW	\$0.001045 per kWh	I
Secondary Service Greater than 10 kW	\$0.001146 per kWh	I
Primary Service	\$0.000257 per kWh	R
Transmission Service	\$0.000323 per kW	I

##### **NOTICE**

This Rate Schedule is subject to the Company's Tariff and Applicable Legal Authorities.

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

**PROTECTIVE ORDER**

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

It is ORDERED that:

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

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

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knowledge, or which becomes public knowledge other than through disclosure in violation of this Protective Order.

3. **Reviewing Party.** For the purposes of this Protective Order, a “Reviewing Party” is any party to this docket.
4. **Procedures for Designation of Protected Materials.** On or before the date the Protected Materials or Highly Sensitive Protected Materials are provided to the Commission, the producing party shall file with the Commission and deliver to each party to the proceeding a written statement, which may be in the form of an objection, indicating: (a) any exemptions to the Public Information Act claimed to apply to the alleged Protected Materials; (b) the reasons supporting the producing party’s claim that the responsive information is exempt from public disclosure under the Public Information Act and subject to treatment as protected materials; and (c) that counsel for the producing party has reviewed the information sufficiently to state in good faith that the information is exempt from public disclosure under the Public Information Act and merits the Protected Materials designation.
5. **Persons Permitted Access to Protected Materials.** Except as otherwise provided in this Protective Order, a Reviewing Party may access Protected Materials only through its “Reviewing Representatives” who have signed the Protective Order Certification Form (see Attachment A). Reviewing Representatives of a Reviewing Party include its counsel of record in this proceeding and associated attorneys, paralegals, economists, statisticians, accountants, consultants, or other persons employed or retained by the Reviewing Party and directly engaged in this proceeding. At the request of the PUC Commissioners, copies of Protected Materials may be produced by Commission Staff. The Commissioners and their staff shall be informed of the existence and coverage of this Protective Order and shall observe the restrictions of the Protective Order.
6. **Highly Sensitive Protected Material Described.** The term “Highly Sensitive Protected Materials” is a subset of Protected Materials and refers to documents or information that a producing party claims is of such a highly sensitive nature that making copies of such documents or information or providing access to such documents to employees of the

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Reviewing Party (except as specified herein) would expose a producing party to unreasonable risk of harm. Highly Sensitive Protected Materials include but are not limited to: (a) customer-specific information protected by § 32.101(c) of the Public Utility Regulatory Act;<sup>2</sup> (b) contractual information pertaining to contracts that specify that their terms are confidential or that are confidential pursuant to an order entered in litigation to which the producing party is a party; (c) market-sensitive fuel price forecasts, wholesale transactions information and/or market-sensitive marketing plans; and (d) business operations or financial information that is commercially sensitive. Documents or information so classified by a producing party shall bear the designation “HIGHLY SENSITIVE PROTECTED MATERIALS PROVIDED PURSUANT TO PROTECTIVE ORDER ISSUED IN DOCKET NO. \_\_\_\_\_” (or words to this effect) and shall be consecutively Bates Stamped. The provisions of this Protective Order pertaining to Protected Materials also apply to Highly Sensitive Protected Materials, except where this Protective Order provides for additional protections for Highly Sensitive Protected Materials. In particular, the procedures herein for challenging the producing party’s designation of information as Protected Materials also apply to information that a producing party designates as Highly Sensitive Protected Materials.

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

Except as expressly provided in this Protective Order, one copy of Highly Sensitive Protected Materials may be made and kept in the possession of outside counsel for a Reviewing Party and one copy in the possession of the outside consultants having a need to access the materials, except that additional copies may be made to have sufficient copies for introduction of the material into the evidentiary record if the material is to be offered for admission into the record. The Reviewing Party shall maintain a record of all copies made of Highly Sensitive Protected Material and shall send a duplicate of the record to the producing party when the copy or copies are made. The record shall specify the location and the person possessing the copy. Limited notes may be made of Highly Sensitive Protected Materials, and such notes shall themselves be treated as Highly Sensitive

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

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Protected Materials unless such notes are limited to a description of the document and a general characterization of its subject matter in a manner that does not state any substantive information contained in the document.

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

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

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

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Commission Staff, OPC, and the OAG when the OAG is a representing a party to the proceeding.

10. **Procedures in Paragraphs 10-14 Apply to Commission Staff, OPC, and the OAG and Control in the Event of Conflict.** The procedures in Paragraphs 10 through 14 apply to responses to requests for documents or information that the producing party designates as Highly Sensitive Protected Materials and provides to Commission Staff, OPC, and the OAG in recognition of their purely public functions. To the extent the requirements of Paragraphs 10 through 14 conflict with any requirements contained in other paragraphs of this Protective Order, the requirements of these Paragraphs shall control.
11. **Copy of Highly Sensitive Protected Material to be Provided to Commission Staff, OPC and the OAG.** When, in response to a request for information by a Reviewing Party, the producing party makes available for review documents or information claimed to be Highly Sensitive Protected Materials, the producing party shall also deliver one copy of the Highly Sensitive Protected Materials to the Commission Staff, OPC, and the OAG (if the OAG is representing a party) in Austin, Texas. Provided however, that in the event such Highly Sensitive Protected Materials are voluminous, the materials will be made available for review by Commission Staff, OPC, and the OAG (if the OAG is representing a party) at the designated office in Austin, Texas. The Commission Staff, OPC and the OAG (if the OAG is representing a party) may request such copies as are necessary of such voluminous material under the copying procedures specified herein.
12. **Delivery of the Copy of Highly Sensitive Protected Material to Commission Staff and Outside Consultants.** The Commission Staff, OPC, and the OAG (if the OAG is representing a party) may deliver the copy of Highly Sensitive Protected Materials received by them to the appropriate members of their staff for review, provided such staff members first sign the certification specified by Paragraph 15. After obtaining the agreement of the producing party, Commission Staff, OPC, and the OAG (if the OAG is representing a party) may deliver the copy of Highly Sensitive Protected Materials received by it to the agreed, appropriate members of their outside consultants for review, provided such outside consultants first sign the certification in Attachment A.

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13. **Restriction on Copying by Commission Staff, OPC and the OAG.** Except as allowed by Paragraph 7, Commission Staff, OPC and the OAG may not make additional copies of the Highly Sensitive Protected Materials furnished to them unless the producing party agrees in writing otherwise, or, upon a showing of good cause, the presiding officer directs otherwise. Commission Staff, OPC, and the OAG may make limited notes of Highly Sensitive Protected Materials furnished to them, and all such handwritten notes will be treated as Highly Sensitive Protected Materials as are the materials from which the notes are taken.
14. **Public Information Requests.** In the event of a request for any of the Highly Sensitive Protected Materials under the Public Information Act, an authorized representative of the Commission, OPC, or the OAG may furnish a copy of the requested Highly Sensitive Protected Materials to the Open Records Division at the OAG together with a copy of this Protective Order after notifying the producing party that such documents are being furnished to the OAG. Such notification may be provided simultaneously with the delivery of the Highly Sensitive Protected Materials to the OAG.
15. **Required Certification.** Each person who inspects the Protected Materials shall, before such inspection, agree in writing to the following certification found in Attachment A to this Protective Order:

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



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

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

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

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

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voluminous Protected Materials, the producing party shall provide a Reviewing Party one copy of the Protected Materials upon receipt of the signed certification described in Paragraph 15. Except for Highly Sensitive Protected Materials, a Reviewing Party may make further copies of Protected Materials for use in this proceeding pursuant to this Protective Order, but a record shall be maintained as to the documents reproduced and the number of copies made, and upon request the Reviewing Party shall provide the party asserting confidentiality with a copy of that record.

18. **Procedures Regarding Voluminous Protected Materials.** 16 Tex. Admin. Code (TAC) § 22.144(h) will govern production of voluminous Protected Materials. Voluminous Protected Materials will be made available in the producing party's voluminous room, in Austin, Texas, or at a mutually agreed upon location, Monday through Friday, 9:00 a.m. to 5:00 p.m. (except on state or Federal holidays), and at other mutually convenient times upon reasonable request.
19. **Reviewing Period Defined.** The Protected Materials may be reviewed only during the Reviewing Period, which shall commence upon entry of this Protective Order and continue until the expiration of the Commission's plenary jurisdiction. The Reviewing Period shall reopen if the Commission regains jurisdiction due to a remand as provided by law. Protected materials that are admitted into the evidentiary record or accompanying the evidentiary record as offers of proof may be reviewed throughout the pendency of this proceeding and any appeals.
20. **Procedures for Making Copies of Voluminous Protected Materials.** Other than Highly Sensitive Protected Materials, Reviewing Parties may take notes regarding the information contained in voluminous Protected Materials made available for inspection or they may make photographic, mechanical or electronic copies of the Protected Materials, subject to the conditions in this Protective Order; provided, however, that before photographic, mechanical or electronic copies may be made, the Reviewing Party seeking photographic, mechanical or electronic copies must provide written confirmation of the receipt of copies listed on Attachment B of this Protective Order identifying each piece of Protected Materials or portions thereof the Reviewing Party will need.

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21. **Protected Materials to be Used Solely for the Purposes of These Proceedings.** All Protected Materials shall be made available to the Reviewing Parties and their Reviewing Representatives solely for the purposes of these proceedings. Access to the Protected Materials may not be used in the furtherance of any other purpose, including, without limitation: (a) any other pending or potential proceeding involving any claim, complaint, or other grievance of whatever nature, except appellate review proceedings that may arise from or be subject to these proceedings; or (b) any business or competitive endeavor of whatever nature. Because of their statutory regulatory obligations, these restrictions do not apply to Commission Staff or OPC.
22. **Procedures for Confidential Treatment of Protected Materials and Information Derived from Those Materials.** Protected Materials, as well as a Reviewing Party's notes, memoranda, or other information regarding or derived from the Protected Materials are to be treated confidentially by the Reviewing Party and shall not be disclosed or used by the Reviewing Party except as permitted and provided in this Protective Order. Information derived from or describing the Protected Materials shall be maintained in a secure place and shall not be placed in the public or general files of the Reviewing Party except in accordance with the provisions of this Protective Order. A Reviewing Party must take all reasonable precautions to insure that the Protected Materials including notes and analyses made from Protected Materials that disclose Protected Materials are not viewed or taken by any person other than a Reviewing Representative of a Reviewing Party.
23. **Procedures for Submission of Protected Materials.** If a Reviewing Party tenders for filing any Protected Materials, including Highly Sensitive Protected Materials, or any written testimony, exhibit, brief, motion or other type of pleading or other submission at the Commission or before any other judicial body that quotes from Protected Materials or discloses the content of Protected Materials, the confidential portion of such submission shall be filed and served in sealed envelopes or other appropriate containers endorsed to the effect that they contain Protected Material or Highly Sensitive Protected Material and are sealed pursuant to this Protective Order. If filed at the Commission, such documents shall be marked "PROTECTED MATERIAL" and shall be filed under seal with the

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presiding officer and served under seal to the counsel of record for the Reviewing Parties. The presiding officer may subsequently, on his/her own motion or on motion of a party, issue a ruling respecting whether or not the inclusion, incorporation or reference to Protected Materials is such that such submission should remain under seal. If filing before a judicial body, the filing party: (a) shall notify the party which provided the information within sufficient time so that the producing party may seek a temporary sealing order; and (b) shall otherwise follow the procedures in Rule 76a, Texas Rules of Civil Procedure.

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

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information or material has entered the public domain, such Reviewing Party shall first file and serve on all parties written notice of such proposed disclosure or request for change in designation, identifying with particularity each of such Protected Materials. A Reviewing Party shall at any time be able to file a written motion to challenge the designation of information as Protected Materials.

26. **Procedures to Contest Disclosure or Change in Designation.** In the event that the party asserting confidentiality wishes to contest a proposed disclosure or request for change in designation, the party asserting confidentiality shall file with the appropriate presiding officer its objection to a proposal, with supporting affidavits, if any, within five (5) working days after receiving such notice of proposed disclosure or change in designation. Failure of the party asserting confidentiality to file such an objection within this period shall be deemed a waiver of objection to the proposed disclosure or request for change in designation. Within five (5) working days after the party asserting confidentiality files its objection and supporting materials, the party challenging confidentiality may respond. Any such response shall include a statement by counsel for the party challenging such confidentiality that he or she has reviewed all portions of the materials in dispute and, without disclosing the Protected Materials, a statement as to why the Protected Materials should not be held to be confidential under current legal standards, or that the party asserting confidentiality for some reason did not allow such counsel to review such materials. If either party wishes to submit the material in question for in camera inspection, it shall do so no later than five (5) working days after the party challenging confidentiality has made its written filing.
27. **Procedures for Presiding Officer Determination Regarding Proposed Disclosure or Change in Designation.** If the party asserting confidentiality files an objection, the appropriate presiding officer will determine whether the proposed disclosure or change in designation is appropriate. Upon the request of either the producing or Reviewing Party or upon the presiding officer's own initiative, the presiding officer may conduct a prehearing conference. The burden is on the party asserting confidentiality to show that such proposed disclosure or change in designation should not be made. If the presiding

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officer determines that such proposed disclosure or change in designation should be made, disclosure shall not take place earlier than three (3) full working days after such determination unless otherwise ordered. No party waives any right to seek additional administrative or judicial remedies concerning such presiding officer's ruling.

28. **Maintenance of Protected Status during Periods Specified for Challenging Various Orders.** Any party electing to challenge, in the courts of this state, a Commission or presiding officer determination allowing disclosure or a change in designation shall have a period of ten (10) days from: (a) the date of an unfavorable Commission order; or (b) if the Commission does not rule on an appeal of an interim order, the date an appeal of an interim order to the Commission is overruled by operation of law, to obtain a favorable ruling in state district court. Any party challenging a state district court determination allowing disclosure or a change in designation shall have an additional period of ten (10) days from the date of the order to obtain a favorable ruling from a state appeals court. Finally, any party challenging a determination of a state appeals court allowing disclosure or a change in designation shall have an additional period of ten (10) days from the date of the order to obtain a favorable ruling from the state supreme court, or other appellate court. All Protected Materials shall be afforded the confidential treatment and status provided for in this Protective Order during the periods for challenging the various orders referenced in this paragraph. For purposes of this paragraph, a favorable ruling of a state district court, state appeals court, Supreme Court or other appellate court includes any order extending the deadlines in this paragraph.
29. **Other Grounds for Objection to Use of Protected Materials Remain Applicable.** Nothing in this Protective Order shall be construed as precluding any party from objecting to the use of Protected Materials on grounds other than confidentiality, including the lack of required relevance. Nothing in this Protective Order constitutes a waiver of the right to argue for more disclosure, provided, however, that unless the Commission or a court orders such additional disclosure, all parties will abide by the restrictions imposed by the Protective Order.

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30. **Protection of Materials from Unauthorized Disclosure.** All notices, applications, responses or other correspondence shall be made in a manner which protects Protected Materials from unauthorized disclosure.
31. **Return of Copies of Protected Materials and Destruction of Information Derived from Protected Materials.** Following the conclusion of these proceedings, each Reviewing Party must, no later than thirty (30) days following receipt of the notice described below, return to the party asserting confidentiality all copies of the Protected Materials provided by that party pursuant to this Protective Order and all copies reproduced by a Reviewing Party, and counsel for each Reviewing Party must provide to the party asserting confidentiality a letter by counsel that, to the best of his or her knowledge, information, and belief, all copies of notes, memoranda, and other documents regarding or derived from the Protected Materials (including copies of Protected Materials) that have not been so returned, if any, have been destroyed, other than notes, memoranda, or other documents which contain information in a form which, if made public, would not cause disclosure of the substance of Protected Materials. As used in this Protective Order, “conclusion of these proceedings” refers to the exhaustion of available appeals, or the running of the time for the making of such appeals, as provided by applicable law. If, following any appeal, the Commission conducts a remand proceeding, then the “conclusion of these proceedings” is extended by the remand to the exhaustion of available appeals of the remand, or the running of the time for making such appeals of the remand, as provided by applicable law. Promptly following the conclusion of these proceedings, counsel for the party asserting confidentiality will send a written notice to all other parties, reminding them of their obligations under this Paragraph. Nothing in this Paragraph shall prohibit counsel for each Reviewing Party from retaining two (2) copies of any filed testimony, brief, application for rehearing, hearing exhibit or other pleading which refers to Protected Materials provided that any such Protected Materials retained by counsel shall remain subject to the provisions of this Protective Order.

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32. **Applicability of Other Law.** This Protective Order is subject to the requirements of the Public Information Act, the Open Meetings Act,<sup>3</sup> the Texas Securities Act<sup>4</sup> and any other applicable law, provided that parties subject to those acts will notify the party asserting confidentiality, if possible under those acts, prior to disclosure pursuant to those acts. Such notice shall not be required where the Protected Materials are sought by governmental officials authorized to conduct a criminal or civil investigation that relates to or involves the Protected Materials, and those governmental officials aver in writing that such notice could compromise the investigation and that the governmental entity involved will maintain the confidentiality of the Protected Materials.
33. **Procedures for Release of Information under Order.** If required by order of a governmental or judicial body, the Reviewing Party may release to such body the confidential information required by such order; provided, however, that: (a) the Reviewing Party shall notify the producing party of the order requiring the release of such information within five (5) calendar days of the date the Reviewing Party has notice of the order; (b) the Reviewing Party shall notify the producing party at least five (5) calendar days in advance of the release of the information to allow the producing party to contest any release of the confidential information; and (c) the Reviewing Party shall use its best efforts to prevent such materials from being disclosed to the public. The terms of this Protective Order do not preclude the Reviewing Party from complying with any valid and enforceable order of a state or federal court with competent jurisdiction specifically requiring disclosure of Protected Materials earlier than contemplated herein. The notice specified in this section shall not be required where the Protected Materials are sought by governmental officials authorized to conduct a criminal or civil investigation that relates to or involves the Protected Materials, and those governmental officials aver in writing that such notice could compromise the investigation and that the governmental entity involved will maintain the confidentiality of the Protected Materials.

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<sup>3</sup> Tex. Gov't Code Ann. § 551.001-551.146 (West 2012 & Supp. 2016).

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



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34. **Best Efforts Defined.** The term “best efforts” as used in the preceding paragraph requires that the Reviewing Party attempt to ensure that disclosure is not made unless such disclosure is pursuant to a final order of a Texas governmental or Texas judicial body, the written opinion of the Texas Attorney General sought in compliance with the Public Information Act, or the request of governmental officials authorized to conduct a criminal or civil investigation that relates to or involves the Protected Materials. The Reviewing Party is not required to delay compliance with a lawful order to disclose such information but is simply required to timely notify the party asserting confidentiality, or its counsel, that it has received a challenge to the confidentiality of the information and that the Reviewing Party will either proceed under the provisions of §552.301 of the Public Information Act, or intends to comply with the final governmental or court order. Provided, however, that no notice is required where the Protected Materials are sought by governmental officials authorized to conduct a criminal or civil investigation that relates to or involves the Protected Materials, and those governmental officials aver in writing that such notice could compromise the investigation and that the governmental entity involved will maintain the confidentiality of the Protected Materials.
35. **Notify Defined.** “Notify” for purposes of Paragraphs 32, 33 and 34 means written notice to the party asserting confidentiality at least five (5) calendar days prior to release; including when a Reviewing Party receives a request under the Public Information Act. However, the Commission, OAG, or OPC may provide a copy of Protected Materials to the Open Records Division of the OAG as provided herein.
36. **Requests for Non-Disclosure.** If the producing party asserts that the requested information should not be disclosed at all, or should not be disclosed to certain parties under the protection afforded by this Protective Order, the producing party shall tender the information for in camera review to the presiding officer within ten (10) calendar days of the request. At the same time, the producing party shall file and serve on all parties its argument, including any supporting affidavits, in support of its position of non-disclosure. The burden is on the producing party to establish that the material should not be disclosed. The producing party shall serve a copy of the information under the classification of Highly

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Sensitive Protected Material to all parties requesting the information that the producing party has not alleged should be prohibited from reviewing the information.

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

37. **Sanctions Available for Abuse of Designation.** If the presiding officer finds that a producing party unreasonably designated material as Protected Material or as Highly Sensitive Protected Material, or unreasonably attempted to prevent disclosure pursuant to Paragraph 36, the presiding officer may sanction the producing party pursuant to 16 TAC § 22.161.
38. **Modification of Protective Order.** Each party shall have the right to seek changes in this Protective Order as appropriate from the presiding officer.
39. **Breach of Protective Order.** In the event of a breach of the provisions of this Protective Order, the producing party, if it sustains its burden of proof required to establish the right to injunctive relief, shall be entitled to an injunction against such breach without any requirements to post bond as a condition of such relief. The producing party shall not be relieved of proof of any element required to establish the right to injunctive relief. In addition to injunctive relief, the producing party shall be entitled to pursue any other form of relief to which it is entitled.

ATTACHMENT A

Protective Order Certification

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

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Party Represented

\_\_\_\_\_  
Printed Name

\_\_\_\_\_  
Date

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

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Party Represented

\_\_\_\_\_  
Printed Name

\_\_\_\_\_  
Date

**ATTACHMENT B**

I request to view/copy the following documents:

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

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Party Represented

\_\_\_\_\_  
Printed Name

\_\_\_\_\_  
Date

PUBLIC UTILITY COMMISSION OF TEXAS

APPLICATION OF

AEP TEXAS INC.

TO ADJUST

ENERGY EFFICIENCY COST RECOVERY FACTOR AND RELATED RELIEF

DIRECT TESTIMONY OF

ROBERT CAVAZOS

FOR

AEP TEXAS INC.

June 1, 2021

## TESTIMONY INDEX

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<u>EXHIBIT</u>	<u>DESCRIPTION</u>
EXHIBIT RC-1	Docket No. 50892 Proceeding Expenses
EXHIBIT RC-2	Docket No. 50892 Municipal Expenses

1 I. INTRODUCTION

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

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

6 Q. PLEASE STATE YOUR EDUCATIONAL AND PROFESSIONAL BACKGROUND.

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

1 efficiency programs in compliance with the Public Utility Regulatory Act (PURA)<sup>1</sup>  
2 and with Public Commission of Texas (Commission) rules for such programs.

3 Q. HOW DOES THE MERGER OF THE CENTRAL AND NORTH DIVISIONS OF  
4 AEP TEXAS AND THE SUBSEQUENT CONSOLIDATION OF AEP TEXAS  
5 RATES AND TARIFFS AFFECT AEP TEXAS' EECRF REQUEST IN THIS  
6 PROCEEDING?.

7 A. The consolidation of AEP Texas' rates and subsequent removal of energy efficiency  
8 costs from base rates has allowed AEP Texas to recover of its energy efficiency costs  
9 through a combined AEP Texas EECRF. However, as explained by AEP Texas witness  
10 Jennifer Jackson, AEP Texas' base rates included energy efficiency costs through May  
11 2020. Consequently, recognition of the recovery of energy efficiency costs through  
12 base rates through May 2020 is required in order to evaluate the 2020 over/under  
13 recovery amount to be included in the 2022 EECRF rate update.

14 Q. HAVE YOU PREVIOUSLY FILED TESTIMONY BEFORE ANY REGULATORY  
15 AGENCY?

16 A. Yes, I have previously filed testimony before the Commission in the energy efficiency  
17 cost recovery factor (EECRF) dockets: Docket No. 44717; Docket No. 44718; Docket  
18 No. 45928; Docket No. 45929; Docket No. 47236; Docket No. 48422; Docket No.  
19 49592; and Docket No. 50892.

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<sup>1</sup> PURA is codified at Tex. Util. Code Ann. §§ 11.001–66.016.



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

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

6 Q. DESCRIBE THE AEP TEXAS ENERGY EFFICIENCY AND CONSUMER  
7 PROGRAMS DEPARTMENT.

8 A. The AEP Texas Energy Efficiency and Consumer Programs (EE/CP) Department  
9 consists of 9 employee positions, each with certain designated responsibilities for the  
10 design, implementation, and overall administration of energy efficiency and demand  
11 response programs for AEP Texas.

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

1                    II. PURPOSE OF TESTIMONY AND SUMMARY OF AEP TEXAS' FILING

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

3        A.        The purpose of my testimony is to:

- 4                    • provide a summary of the relief sought by AEP Texas in this proceeding  
5                    and of its filing;
- 6                    • lay out the policy considerations for recovery of AEP Texas' projected  
7                    costs for its 2022 energy efficiency programs in its adjusted EECRF for  
8                    2022, as contemplated by PURA § 39.905 and 16 Tex. Admin. Code  
9                    § 25.182(d) (TAC);
- 10                   • provide information regarding the under-recovery of AEP Texas'  
11                   energy efficiency program revenues for its 2020 programs to be  
12                   included in its adjusted EECRF in 2022;
- 13                   • provide information regarding AEP Texas' performance bonus for its  
14                   2020 energy efficiency results, as contemplated in 16 TAC § 25.182(e),  
15                   to be recovered through its adjusted EECRF in 2022;
- 16                   • provide information regarding AEP Texas' share of costs for  
17                   Evaluation, Measurement and Verification (EM&V) activities for  
18                   evaluating programs, as contemplated in 16 TAC § 25.182(d)(1), to be  
19                   recovered through its adjusted EECRF; and
- 20                   • provide information regarding recovery of 2020 EECRF proceeding  
21                   expenses incurred in Docket No. 50892 by AEP Texas and the  
22                   municipalities to be recovered through its adjusted EECRF in 2022.

23        Q.        PLEASE DESCRIBE AEP TEXAS' FILING.

24        A.        AEP Texas' filing consists of my direct testimony and the direct testimony of three  
25                   other witnesses (Osterloh, Jackson, and Lysiak). Ms. Osterloh's direct testimony  
26                   addresses the energy efficiency costs that AEP Texas incurred for its 2020 programs;  
27                   the EM&V costs actually incurred in 2020 for the evaluation of program year (PY)  
28                   2019; energy efficiency results from its 2020 programs; energy efficiency goals for  
29                   2022 as established by the Commission's rule; the impact of the industrial identification  
30                   notice as stated in 16 TAC § 25.181(u); the programs that AEP Texas will offer in 2022  
31                   to meet its energy efficiency objectives; the costs AEP Texas projects to incur in 2022

1 in connection with these energy efficiency programs and objectives; and Docket No.  
2 50892 EECRF proceeding expenses incurred by AEP Texas and incurred by the  
3 municipalities and reimbursed by AEP Texas pursuant to 16 TAC § 25.182(d)(3).

4 Ms. Jackson's direct testimony describes the design of the adjusted EECRF, the  
5 energy efficiency cost assignment among the EECRF rate classes to be recovered  
6 through the adjusted EECRF, and the billing determinants used to develop the adjusted  
7 EECRF.

8 Mr. Lysiak's direct testimony describes the costs billed between the AEP Texas  
9 divisions for AEP Texas' energy efficiency programs and the reasonableness of these  
10 costs.

11 Accompanying the direct testimony of AEP Texas' witnesses are Schedules A  
12 through R, which include the information that the Commission has specified should be  
13 provided in support of a sufficient request for the adjusted EECRF. The reasonableness  
14 of costs incurred in 2020 is included within the schedules of this filing. AEP Texas has  
15 also included Schedule S, AEP Texas' Revised 2021 Energy Efficiency Plan and  
16 Report (EEPR) filed in Docket No. 51672.

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

18 A. 16 TAC § 25.182(d)(8) requires a utility in an area in which customer choice is offered  
19 to apply no later than June 1<sup>st</sup> —of each year to adjust its EECRF effective March 1<sup>st</sup>  
20 —of the following year, in order to reflect changes in costs, performance bonus, its  
21 share of EM&V costs, and to minimize any over- or under-recovery in prior years'  
22 program costs. Accordingly, by this application AEP Texas requests the Commission  
23 to approve an adjustment the AEP Texas EECRFs to recover \$27,021,197. As my

1 testimony and the testimony of AEP Texas witnesses Osterloh, Jackson, and Lysiak  
2 explain, the amount AEP Texas seeks to recover through its adjusted 2022 EECRF  
3 reflects the following components:

- 4 1) recovery of \$17,747,658 for AEP Texas which is the forecasted 2022  
5 energy efficiency program expenditures;
- 6 2) recovery from customers in the amount of \$351,084 representing the  
7 under-recovery of actual energy efficiency costs for 2020 (includes  
8 interest and recovery of 2019 EM&V costs);
- 9 3) recovery of \$8,673,275 representing AEP Texas' 2020 performance  
10 bonus for achieving demand and energy savings that exceeded its  
11 minimum goals to be achieved in 2020;
- 12 4) recovery of \$26,739 representing 2020 EECRF proceeding expenses  
13 incurred in Docket No. 50892 by AEP Texas and of \$11,083  
14 representing 2020 EECRF proceeding expenses incurred in Docket No.  
15 50892 by municipalities as authorized by 16 TAC § 25.182(d)(3); and
- 16 5) recovery of \$211,359 for AEP Texas' share of the EM&V cost to  
17 evaluate PY 2021.

18 Q. WHAT ARE AEP TEXAS' ESTIMATED PY 2022 ENERGY EFFICIENCY COSTS?

19 A. As shown in Schedule A, PY 2022 projected energy efficiency program cost of  
20 \$17,747,658 is reasonably necessary for AEP Texas to achieve its energy efficiency  
21 objectives for PY 2022 pursuant to 16 TAC § 25.181(e)(1).

22 Q. DOES AEP TEXAS' 2022 EECRF INCLUDE AEP TEXAS' PROJECTED SHARE  
23 OF THE STATEWIDE EM&V COSTS?

24 A. Yes, AEP Texas is including \$211,359 to be incurred in 2022 for the evaluation of PY  
25 2021.

1 Q. DID AEP TEXAS SPEND MORE OR LESS THAN IT PROJECTED FOR ITS 2020  
2 ENERGY EFFICIENCY PROGRAMS?

3 A. As shown on Schedule B-1, Central Division incurred a total of \$14,189,139 in energy  
4 efficiency expenditures and EM&V costs in 2020, which is \$385,476 less than its 2020  
5 projection for energy efficiency.

6 As shown on Schedule B-2, North Division incurred a total of \$3,279,662 in  
7 energy efficiency expenditures and EM&V costs in 2020, which is \$108,980 less than  
8 its 2020 projection for energy efficiency.

9 Q. DID AEP TEXAS EXCEED ITS GOALS FOR 2020?

10 A. Yes, Central Division exceeded its demand reduction and energy reduction goals for  
11 PY 2020 of 16.38 megawatt (MW) and 28,698 megawatt-hour (MWh) respectively.  
12 North Division exceeded its demand reduction and energy reduction goals for PY 2020  
13 of 4.26 MW and 7,464 MWh respectively.

14 Q. DID AEP TEXAS EARN A PERFORMANCE BONUS FOR ITS 2020 ENERGY  
15 EFFICIENCY ACHIEVEMENTS?

16 A. Yes. AEP Texas earned a performance bonus of \$8,673,275. Schedule D sets forth  
17 the calculation of the \$6,974,884 and \$1,698,391 performance bonus that Central  
18 Division and North Division earned, respectively. AEP Texas requests that these  
19 performance bonus amounts of \$8,673,275 also be included for recovery through its  
20 adjusted EECRF for 2022.

1 Q. WHAT DOES AEP TEXAS REQUEST TO BE THE EFFECTIVE DATE OF THE  
2 ADJUSTED EECRF FOR 2022?

3 A. Pursuant to 16 TAC § 25.182(d)(8), AEP Texas requests that the adjusted EECRF be  
4 made effective March 1, 2022.  
5

6 III. POLICY CONSIDERATIONS FOR RECOVERY OF  
7 ENERGY EFFICIENCY EXPENDITURES

8 A. Statutory Policies

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

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

17 a) not less than 30 percent of the utility's annual growth in demand of  
18 residential and commercial customers by December 31<sup>st</sup> of each year  
19 beginning with the 2013 calendar year; however, not less than the  
20 preceding year; and

21 b) for an electric utility whose amount of energy efficiency to be acquired  
22 under this subsection is equivalent to at least four-tenths of one percent  
23 of the electric utility's summer weather-adjusted peak demand for  
24 residential and commercial customers in the previous calendar year, not  
25 less than four-tenths of one percent of the utility's summer weather-  
26 adjusted peak demand for residential and commercial customers by  
27 December 31<sup>st</sup> of each subsequent year; however, not less than the  
28 preceding year.

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

5                           B. Commission Rule Pertaining to an EECRF Filing

6   Q.     WHAT ARE THE MINIMUM ANNUAL ENERGY EFFICIENCY GOALS FOR PY  
7           2022?

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

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

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

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

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

27   Q.     HOW HAS AEP TEXAS ESTABLISHED ITS GOAL FOR 2022?

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

1 Q. WHY IS AEP TEXAS FILING THIS REQUEST TO ADJUST ITS EECRF FOR  
2 RECOVERY OF ITS PROJECTED PY 2022 ENERGY EFFICIENCY  
3 EXPENDITURES?

4 A. The Commission rule includes provisions for a utility such as AEP Texas to request  
5 that an EECRF be adjusted to recover its annual energy efficiency program  
6 expenditures (16 TAC § 25.182(d)(1)). AEP Texas witness Jackson's testimony  
7 outlines the design of factors to accomplish this. Also, as I stated earlier, 16 TAC  
8 § 25.182(d)(8) requires a utility in an area in which customer choice is offered to apply  
9 to adjust its EECRF no later than June 1<sup>st</sup> of each year, with the adjusted EECRF to be  
10 effective March 1<sup>st</sup> of the following year, to reflect changes in program costs and  
11 performance bonus and to minimize any over- or under-recovery in prior year program  
12 costs.

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

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

22 As outlined in the Commission rule for energy efficiency, an EECRF rate  
23 schedule must be included in the utility's tariff to permit the utility to timely recover



1 the reasonable costs of providing energy efficiency programs, including prior years'  
2 over- or under-recovery of energy efficiency program costs, any applicable  
3 performance bonus (16 TAC § 25.182(e)), projected EM&V costs and EECRF  
4 proceeding expenses incurred by AEP Texas and municipalities (16 TAC  
5 § 25.182(d)(3)). The EECRF is to be calculated to recover the costs associated with  
6 the programs from EECRF classes that receive services under the programs AEP Texas  
7 offers (16 TAC § 25.182(d)(2)). The Commission may approve an energy charge for  
8 the EECRF. The EECRF must be set at a rate that will give AEP Texas the opportunity  
9 to earn revenues equal to the sum of AEP Texas' forecasted energy efficiency program  
10 costs, net of energy efficiency costs included in base rates, applicable prior years'  
11 energy efficiency over- or under-recovery, applicable performance bonus (16 TAC  
12 § 25.182(d)(1)), projected EM&V costs, and AEP Texas and municipal EECRF  
13 proceeding expenses.

14 According to the Commission rule regarding a proceeding to change an  
15 EECRF, a utility must show that the costs to be recovered through the EECRF are  
16 reasonable estimates of the costs necessary to provide energy efficiency programs and  
17 to meet the utility's goals (16 TAC § 25.182(d)(12)).  
18

#### 19 IV. AEP TEXAS' APPLICATION

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

22 A. According to 16 TAC § 25.182(d)(10), a utility's application to change an EECRF must  
23 include testimony and schedules. AEP Texas' application includes testimony and

1 schedules providing the information in compliance with 16 TAC § 25.182(d) for  
2 approval of an adjusted EECRF that show:

- 3 1. the forecasted energy efficiency program costs for PY 2022;
- 4 2. the actual base rate recovery of energy efficiency program costs, adjusted  
5 for changes in load subsequent to the last base rate proceeding;
- 6 3. the performance bonus based on AEP Texas' PY 2020 energy efficiency  
7 achievements;
- 8 4. the amount of AEP Texas' PY 2020 actual energy efficiency costs that  
9 exceeded the amount recovered in base rates;
- 10 5. any adjustment for past over- or under-recovery of energy efficiency  
11 revenues including interest;
- 12 6. information concerning the calculation of billing determinants for 2020  
13 and 2022;
- 14 7. the direct assignment and allocation of energy efficiency costs to eligible  
15 rate classes, including any portion of energy efficiency costs included in  
16 base rates;
- 17 8. information concerning calculations related to the cost cap requirements;
- 18 9. incentive payments by program, including a list of each EESP receiving  
19 more than 5% of 2020 overall incentive payments and the percentage of  
20 2020 incentives received by those EESPs;
- 21 10. administrative costs, including any EECRF proceeding expenses for  
22 2020;
- 23 11. actual EECRF revenues by rate class, for the period of over-recovery of  
24 2020 EECRF costs;
- 25 12. AEP Texas' bidding and engagement process for contracting with  
26 EESPs, including a list of all EESPs that received incentive payments  
27 during 2020;
- 28 13. the estimated useful life for each measure in each program; and
- 29 14. the actual energy efficiency program costs for PY 2020.

30 All of these elements in AEP Texas' application for approval of its adjusted EECRF  
31 for 2022 are required by virtue of 16 TAC § 25.182(d)(10) and (11).

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

Q. WHAT DEMAND REDUCTION AND ENERGY SAVINGS DOES AEP TEXAS PROPOSE TO ACHIEVE THROUGH ITS PY 2022 PROGRAMS?

A. AEP Texas' PY 2022 minimum demand reduction goal is 20.60 MW, as calculated in accordance with 16 TAC § 25.181(e)(1)(B)(C) and (D). AEP Texas' PY 2022 energy savings goal is 36,091 MWh, as calculated in accordance with 16 TAC § 25.181(e)(4).

The energy efficiency objectives AEP Texas seeks to achieve through its proposed PY 2022 energy efficiency expenditures include a peak demand reduction of as much as 43.71 MW and energy savings of as much as 61,616 MWh.

Q. DO YOU BELIEVE IT IS CONSISTENT WITH THE COMMISSION RULE TO PURSUE THE OBJECTIVES AEP TEXAS HAS ESTABLISHED FOR ITS PY 2022 PROGRAM?

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

1                                    B. Industrial Notice Customers

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

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

5    Q.    ARE THESE INDUSTRIAL CUSTOMERS WHO HAVE PROVIDED NOTICE  
6           EXEMPT FROM PAYING CHARGES IN THE ADJUSTED EECRF FOR 2022?

7    A.    Yes. 16 TAC § 25.181(u) states that if an identification notice was submitted to the  
8           utility no later than February 1<sup>st</sup> to be effective the following program year, the  
9           identified industrial customer(s) shall not be charged any EECRF costs for a period of  
10          three years.

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

12   Q.    DID AEP TEXAS' PY 2020 ENERGY EFFICIENCY PROGRAM COSTS INCLUDE  
13          R&D EXPENDITURES?

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

16   Q.    DOES AEP TEXAS' PY 2022 ENERGY EFFICIENCY PROGRAM COST  
17          INCLUDE R&D EXPENDITURES?

18   A.    Yes, it does.

19   Q.    HAS AEP TEXAS PROJECTED ITS PY 2022 R&D EXPENDITURES?

20   A.    Yes. AEP Texas has projected \$353,646 for R&D expenditures in PY 2022.

21   Q.    HAS AEP TEXAS INCLUDED THE MAXIMUM AMOUNT IN PY 2022 FOR  
22          ENERGY EFFICIENCY R&D EXPENDITURES ALLOWED BY THE  
23          COMMISSION RULE?

1 A. No, 16 TAC § 25.181(g) specifies that the maximum amount of energy efficiency R&D  
2 costs that AEP Texas could incur is 10% of its total program costs for the previous  
3 program year, for PY 2022. However, AEP Texas has projected the amount it considers  
4 to be reasonable for projected R&D expenditures to be \$353,646 considering the whole  
5 of its energy efficiency program offerings and the magnitude of its required demand  
6 reduction goal to be achieved in PY 2022.

7 D. Under-Recovery of PY 2020 Costs

8 Q. IS AEP TEXAS SEEKING TO RECOVER FROM CUSTOMERS THROUGH ITS  
9 PY 2022 EECRF THE AMOUNT OF UNDER-RECOVERED ENERGY  
10 EFFICIENCY PROGRAM EXPENSES IN PY 2020?

11 A. Yes. In addition to collecting its projected total PY 2022 energy efficiency program  
12 expenditures, AEP Texas is requesting to recover from customers within its adjusted  
13 PY 2022 EECRF the amount of its actual PY 2020 EECRF program costs that exceeded  
14 the amount of its energy efficiency program revenues in PY 2020, including interest.

15 Q. PLEASE EXPLAIN THE BASIS FOR AEP TEXAS' INCLUSION OF THE 2020  
16 UNDER-RECOVERY AMOUNT WITHIN ITS ADJUSTED 2022 EECRF.

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

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

24 16 TAC § 25.182(d)(1)(A) further states that the "EECRF shall be calculated based on  
25 the preceding year's over- or under-recovery." The proposed EECRF reflects a

1 recovery from customers in the amount of \$351,084 for AEP Texas actual energy  
2 efficiency costs for 2020, including interest.

3 E. 2020 Performance Bonus

4 Q. HAS AEP TEXAS CALCULATED THE PERFORMANCE BONUS IT SEEKS TO  
5 RECOVER IN CONNECTION WITH ITS PY 2020 ENERGY EFFICIENCY  
6 ACHIEVEMENTS?

7 A. Yes. Please refer to Schedule D for each division, which I sponsor. This schedule  
8 demonstrates the calculation of the \$6,974,884 and \$1,698,391 performance bonus that  
9 Central Division and North Division, respectively, seek to be awarded based upon its  
10 PY 2020 energy efficiency results.

11 Central Division achieved a peak demand reduction of 50.42 MW and energy  
12 savings of 59,265 MWh from its PY 2020 portfolio of energy efficiency programs.  
13 Central Division's minimum demand reduction goal to be achieved in 2020 was 16.38  
14 MW, and the calculated energy reduction goal to be achieved in 2020 was 28,698  
15 MWh. Central Division exceeded both its PY 2020 demand reduction and energy  
16 reduction goals.

17 North Division achieved a peak demand reduction of 5.80 MW and energy  
18 savings of 12,785 MWh from its PY 2020 portfolio of energy efficiency programs.  
19 North Division's minimum demand reduction goal to be achieved in 2020 was 4.26  
20 MW, and the calculated energy reduction goal to be achieved in 2020 was 7,464 MWh.  
21 North Division exceeded both its PY 2020 demand reduction and energy reduction  
22 goals.

1           These achievements qualify AEP Texas for a performance bonus per the  
2           Commission rule. All of the calculations and requirements regarding the \$8,673,275  
3           performance bonus AEP Texas now seeks are as outlined in 16 TAC § 25.182(e).

4                           F. 2020 Energy Efficiency Proceeding Expenses

5    Q.    HAS AEP TEXAS INCLUDED EECRF PROCEEDING EXPENSES?

6    A.    Yes. According to 16 TAC § 25.182(d)(3), a proceeding to adjust an EECRF is a  
7           ratemaking proceeding for purposes of PURA § 33.023 and 36.061. In addition,  
8           EECRF proceeding expenses are to be included in the adjusted EECRF calculated  
9           pursuant to 16 TAC § 25.182(d)(1). In accordance with 16 TAC § 25.182(d)(3), AEP  
10          Texas includes only EECRF proceeding expenses paid or owed for the immediately  
11          previous EECRF proceeding conducted under this subsection for services reimbursable  
12          under PURA § 33.023(b). In this proceeding, AEP Texas is requesting recovery of  
13          \$26,739 of AEP Texas' expenses for Docket No. 50892 and \$11,083 in municipal  
14          expenses. The invoices relating to AEP Texas' 2020 EECRF rate-case expenses in  
15          Docket No. 50892 are included with the affidavit of Leila Melhem attesting to the  
16          reasonableness of those costs as EXHIBIT RC-1. The invoices for the municipalities  
17          expenses are included as EXHIBIT RC-2. A description of how these rate-case  
18          expenses are incorporated into the 2022 Rider EECRF rates can be found in witness  
19          Jackson's testimony.

1 V. 2020 SUMMARY

2 Q. HAS AEP TEXAS PROVIDED INFORMATION REGARDING PY 2020?

3 A. Yes. Information demonstrating the reasonableness of the energy efficiency costs  
4 incurred and revenues received for PY 2020 is included in this filing.

5 Q. HAS AEP TEXAS INCURRED ANY 2020 AFFILIATE COSTS?

6 A. No. As explained by Brian Lysiak, during 2020, no AEPSC services were provided  
7 for the 2020 energy efficiency programs. However, there were services provided by  
8 each division of AEP Texas to support the other division. Because the Central and  
9 North divisions are not affiliates under PURA or the Commission's rules, there were  
10 no affiliate services in 2020. However, Mr. Lysiak provides testimony to show that  
11 even if the Commission's affiliate rules were applied, the services provided by the two  
12 divisions would comply with the affiliate standards. In 2020, Central Division incurred  
13 \$182,456 in costs from the North Division, which is 1.3% of Central Division's actual  
14 2020 energy efficiency costs as addressed in witness Lysiak's testimony. In 2020,  
15 North Division incurred \$178,199 in costs from the Central Division, which is 5.4% of  
16 North Division's actual 2020 energy efficiency costs as addressed in witness Lysiak's  
17 testimony. Please refer to Schedule K for additional information.

18 Q. ARE THE 2020 EXPENSES BETWEEN THE DIVISIONS REASONABLE AND  
19 NECESSARY?

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



1 VI. CONCLUSION

2 Q. PLEASE BRIEFLY SUMMARIZE YOUR TESTIMONY.

3 A. The components AEP Texas includes in its request to adjust its 2022 EECRF have been  
4 properly calculated in accordance with the applicable standards and criteria.

5 1. The energy efficiency costs projected by AEP Texas for its PY 2022  
6 programs represent reasonable estimates of the costs necessary to  
7 provide energy efficiency programs to meet AEP Texas' energy  
8 efficiency objectives for PY 2022.

9 2. AEP Texas' PY 2020 performance bonus calculation comports fully  
10 with the applicable provisions of the Commission rule.

11 3. The PY 2020 energy efficiency program expenditures were reasonable  
12 and necessary costs to provide energy efficiency programs for PY 2020.  
13 It is reasonable and in accordance with the applicable Commission rule  
14 to include the portion of those costs that exceeds the amount of energy  
15 efficiency funding collected through AEP Texas' base rates, and that  
16 revenues that were under-recovered in its 2020 EECRF be returned in  
17 the adjusted 2022 EECRF.

18 4. Proceeding expenses for the previous year's EECRF proceeding are  
19 included in this filing for recovery in the adjusted 2022 EECRF.

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

22 A. Yes, AEP Texas' application meets all of the requirements for approval of the requested  
23 adjustment to its 2022 EECRF to recover all of the components described in my direct  
24 testimony and fully supported by AEP Texas' other witnesses.

25 Q. DOES THIS CONCLUDE YOUR DIRECT TESTIMONY?

26 A. Yes, it does.

PUC DOCKET NO. \_\_\_\_\_

<b>APPLICATION OF AEP TEXAS INC.</b>	<b>§</b>	<b>PUBLIC UTILITY COMMISSION</b>
<b>TO ADJUST ENERGY EFFICIENCY</b>	<b>§</b>	
<b>COST RECOVERY FACTOR AND</b>	<b>§</b>	<b>OF TEXAS</b>
<b>RELATED RELIEF</b>	<b>§</b>	

**AFFIDAVIT OF LEILA M. MELHEM**

STATE OF TEXAS           §  
                                     §  
COUNTY OF TRAVIS     §

BEFORE ME, the undersigned authority, on this day personally appeared Leila M. Melhem, who being by me first duly sworn, on oath, deposed and said the following:

1. My name is Leila M. Melhem. I am over the age of twenty-one years, am of sound mind, have personal knowledge of the statements made herein, and the facts are true and correct. I am competent to make this Affidavit.
2. I am employed by American Electric Power Service Corporation (AEPSC) as Senior Counsel. I have practiced law for eight years, including many cases before the Public Utility Commission of Texas (Commission).
3. I am employed by AEPSC as an attorney in its Legal Department. I have represented American Electric Power Company, Inc.'s (AEP) subsidiary operating companies, including AEP Texas Inc. (AEP Texas), as well as other investor-owned utilities in Texas, on a number of matters. Such matters include energy efficiency cost recovery factor (EECRF) proceedings, base-rate cases, fuel-reconciliation proceedings, sale/transfer/merger dockets, and various tariff-related matters.
4. As Senior Counsel, I am responsible for reviewing and approving invoices from outside law firms and consultants.
5. As Senior Counsel for AEPSC, which is responsible for providing legal services to all AEP business units, I am familiar with the rates of a broad range of lawyers, both those at small and large firms and solo practitioners, including the rates charged by such attorneys for work on matters before the Commission.

6. In the 2020 Application of AEP Texas Inc. to Adjust Energy Efficiency Cost Recovery Factors and Related Relief, Docket No. 50892, AEP Texas was represented by outside counsel with the law firm of Duggins Wren Mann & Romero, LLP (DWMR). The DWMR attorneys who worked on this matter have extensive experience representing utilities before the Commission, including EECRF proceedings.
7. Patrick Pearsall was the primary attorney at DWMR representing AEP Texas in its 2020 EECRF filing in Docket No. 50892. Mr. Pearsall has been a licensed Texas attorney for over 16 years, representing utility clients before the Commission and Texas courts for the last 14 years, and one of DWMR's outside counsels in various proceedings. Moreover, AEP Texas is not the only client he represents before the Commission. Mr. Pearsall is therefore knowledgeable of and skilled in Commission practices and procedures. AEP Texas was also represented by an associate attorney at DWMR who assisted Mr. Pearsall representing AEP Texas in a cost effective manner.
8. The invoices to AEP Texas from DWMR for work in Docket No. 50892, which total approximately \$26,739 and are attached. The billings provide detail of what task was being addressed for the time billed, and therefore, indicate the time billed for any specific issue or issues in last year's proceeding, which would also indicate the amount of rate-case expenses reasonably associated with each issue. I have personally reviewed the invoices on behalf of AEP Texas.
9. I reviewed the above-referenced invoices taking into consideration the eight factors listed in Rule 1.04(b) of the Texas Disciplinary Rules of Professional Conduct:
  - 1) the time and labor required, novelty and difficulty of the questions involved and the skill requisite to perform the legal services properly;
  - 2) the likelihood that acceptance of employment will preclude other employment by the attorney;
  - 3) the fee customarily charged in the locality for similar legal services;
  - 4) the amount of time involved and result achieved;
  - 5) time limitation imposed by the client or by the circumstances;
  - 6) the nature and length of the professional relationship with the client;
  - 7) the experience, reputation and ability of the lawyers performing the services; and
  - 8) whether the fee is fixed or contingent on results or uncertainty of collection before the legal services have been rendered.

10. I considered the factors delineated by the Third Court of Appeals in *City of El Paso v. Public Utility Comm'n of Texas*, 916 S.W.2d 515 (Tex. App.—Austin 1995, writ dismissed by agr.):
  - 1) time and labor required;
  - 2) nature and complexity of the case;
  - 3) amount of money or value of property or interest at stake;
  - 4) extent of responsibilities the attorney assumes;
  - 5) whether the attorney loses other employment because of the undertaking; and
  - 6) benefits to the client from the services.
11. I also considered the relevant criteria relating to the reasonableness of rate-case expenses in 16 Tex. Admin. Code (TAC) § 25.245(b):
  - 1) the nature, extent, and difficulty of the work done by the attorney or other professional in the rate case;
  - 2) the time and labor required and expended by the attorney or other professional;
  - 3) the fees or other consideration paid to the attorney or other professional for the services rendered;
  - 4) the expenses incurred for lodging, meals and beverages, transportation, or other services or materials;
  - 5) the nature and scope of the rate case, including:
    - A. the size of the utility and number and type of consumers served;
    - B. the amount of money or value of property or interest at stake;
    - C. the novelty or complexity of the issues addressed;
    - D. the amount and complexity of discovery;
    - E. the occurrence and length of a hearing; and
  - 6) the specific issue or issues in the rate case and the amount of rate-case expenses reasonably associated with each issue.
12. As noted above, I am familiar with the rates for utility regulatory work in Texas and elsewhere. Generally speaking, the rates charged by an individual lawyer typically vary based on the level of experience possessed by the lawyer performing the work, the size and reputation of the law firm in which the lawyer works, and the technical nature of the work performed. While the hourly rate charged by outside counsel for work in this case is an important factor, it is only one of many important factors to be considered. Equally important are factors such as the number of hours worked, the complexity of the issues

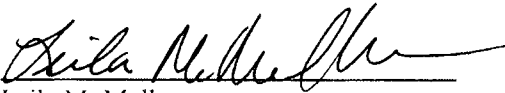
involved, and the experience of the lawyers involved. That is, an experienced lawyer in a complex case with an hourly rate at the high end of the range may be more able to more efficiently do the work than a less experienced lawyer with an hourly rate at the low- or mid-point of the hourly rate range, such that the total amount paid at the end of the day is reasonable, even if the hourly rates are at the high end of the range. Similarly, a lawyer working at an hourly rate at the low- or mid-point range may have spent so many hours on a matter that the total amount paid is not reasonable, even though the rate is low.

13. I am familiar with many regulatory lawyers in the Texas bar, and the lawyers at DWMR enjoy excellent reputations for providing a high level of quality work on both complex and routine matters. DWMR works on matters of significant importance to its utility clients. In my experience, the hourly rates of DWMR for work done in Docket No. 50892 are consistent with other Texas lawyers performing similar work in Texas. Rates for lawyers at the Commission, in my experience, have recently ranged, depending on the experience of the lawyer between \$230 to more than \$700 (and sometimes more for very specialized subject matters, like regulatory tax work). The rates for DWMR work in Docket No. 50892 are in the expected range.
14. The rates charged by DWMR for Docket No. 50892 were the same hourly rates the law firm charged for AEP Texas and its affiliates for other matters of which I am familiar, including matters for which rate-case expense reimbursement was not available.
15. In my opinion, the hourly rates charged by DWMR in Docket No. 50892 are reasonable and in the range of rates charged in Texas by firms with the same level of depth and expertise. Similarly, in my opinion, the other expenses charged by DWMR (i.e., copying, delivery service, etc.) are also reasonable and in line with costs charged by other law firms providing these types of legal services.
16. With respect to 16 TAC § 25.245(b) and (c) that relate to the determination of the reasonableness and necessity of the rate case expenses AEP Texas seeks to recover, the following information is relevant:
  - 1) The rate case expense documentation AEP Texas is filing shows that the fees paid to, tasks performed by, and time spent on a task by an attorney or other professional in these cases is not extreme or excessive;
  - 2) The rate case expense documentation AEP Texas is filing shows that the expenses incurred for any lodging, meals and beverages, transportation, or other services or

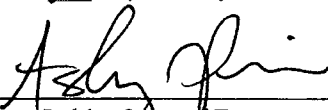
materials were not extreme or excessive:

- 3) AEP Texas' application, testimony, and related material in Docket No. 50892 as well as the rate case documentation AEP Texas is filing show there was no unnecessary duplication of services or testimony;
  - 4) AEP Texas' application, testimony, and related materials show that AEP Texas' EECRF application has a reasonable basis in law, policy, and fact, and is warranted based on Commission precedent in prior EECRF cases;
  - 5) AEP Texas' rate case expenses in Docket No. 50892 as a whole are not disproportionate, excessive, or unwarranted in relation to the nature and scope of the case addressed by the evidence pursuant to 16 TAC § 25.245(b) for the reasons noted above; and
  - 6) Given the rate case expense documentation AEP Texas is filing, AEP Texas did not fail to comply with the requirement for providing sufficient information pursuant to 16 TAC § 25.245(b).
17. Based on my experience and after considering the factors listed in paragraphs 8, 9, 10 above, the \$26,738.50 in rate case expenses incurred by AEP Texas in Docket No. 50892 were reasonable and necessary for the work performed.

**[Signature page follows.  
The remainder of this page is intentionally left blank.]**

  
\_\_\_\_\_  
Leila M. Melhem

SUBSCRIBED AND SWORN TO BEFORE ME on this 27<sup>th</sup> day of May 2021.

  
\_\_\_\_\_  
Notary Public State of Texas  
My Commission Expires: 1/21/25

Header Information

Invoice Number: 34211  
Vendor: Duggins Wren Mann & Romero, LLP  
Address: 600 Congress Ave Suite 1900, Austin, TX, 78701, United States of America  
Tax ID: 27-5110427  
Invoice Date: 06/09/2020  
Received Date: 06/09/2020  
Project: AEP058241-AEP Texas EECRF - Docket No 50892  
Posting Status: Posted

Billing Start Date: 05/13/2020  
Billing End Date: 05/31/2020

Submitted Total: \$9954 00  
Submitted Currency: USD  
Tax Rate: 0 00%  
PS Voucher: 00974440  
Approved Total: \$9456 28

Invoice Summary

Type	Rate x Units	Discount	AEP Disc	Adjustment	AEP Split	Tax	Amount
Fees	9954 00	0 00	497 72	0 00	0 00	0 00	9456 28
Expenses	0 00	0 00	N/A	0 00	0 00	0 00	0 00
Invoice Total	9954 00	0 00	497 72	0 00	0 00	0 00	9456 28

Line Items

Item	Date	Type	Category	TK	Rate	Units	Disc	Adj	Amt
1	05/13/2020	Fee	L120 Analysis/Strategy	Pearsall, Patrick	345 00	0 20	3 45	3 45	65 55
	Activity: A106 Communicate (with client)								
	Description: Analysis/Strategy Communicate with client M Gage and J Frederick re status of case / PUCT/Overall Case Strategy								
	Adjustment: 06/09/2020 - Amount adjusted by 3 45 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 5% discount to vendor fees per billing discount agreement								
2	05/14/2020	Fee	L410 Fact Witnesses	Pearsall, Patrick	345 00	0 90	15 52	15 52	294 98
	Activity: A104 Review/analyze								
	Description: Fact Witnesses Review/Analyze J Jackson, P Osterloh, and R Cavazos direct testimony / PUCT/Overall Case Strategy								
	Adjustment: 06/09/2020 - Amount adjusted by 15 52 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 5% discount to vendor fees per billing discount agreement								
3	05/15/2020	Fee	L410 Fact Witnesses	Pearsall, Patrick	345 00	0 80	13 80	13 80	262 20
	Activity: A104 Review/analyze								
	Description: Fact Witnesses Review/Analyze issues re J Jackson direct testimony / PUCT/Rate Design								
	Adjustment: 06/09/2020 - Amount adjusted by 13 80 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 5% discount to vendor fees per billing discount agreement								
4	05/18/2020	Fee	L120 Analysis/Strategy	Pearsall, Patrick	345 00	0 60	10 35	10 35	196 65
	Activity: A104 Review/analyze								
	Description: Analysis/Strategy Review/Analyze issues re scope of application and supporting testimony / PUCT/Non-Discovery Pleadings and Motions								
	Adjustment: 06/09/2020 - Amount adjusted by 10 35 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 5% discount to vendor fees per billing discount agreement								
5	05/20/2020	Fee	L120 Analysis/Strategy	Green, Stephanie	230 00	0 40	4 60	4 60	87 40
	Activity: A104 Review/analyze								
	Description: Analysis/Strategy Review/Analyze dockets regarding level of proof supplied regarding RCE in EECRF dockets / PUCT/Rate Case Expenses								
	Adjustment: 06/09/2020 - Amount adjusted by 4 60 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 5% discount to vendor fees per billing discount agreement								
6	05/20/2020	Fee	L120 Analysis/Strategy	Green, Stephanie	230 00	0 70	8 05	8 05	152 95
	Activity: A104 Review/analyze								
	Description: Analysis/Strategy Review/Analyze affidavit and compare to similar filings by other utilities re level of specificity and proof re RCE in EECRF dockets / PUCT/Rate Case Expenses								
	Adjustment: 06/09/2020 - Amount adjusted by 8 05 - system, system Reason for Adjustment: Discount Agreement								



<b>Comments to Requestor:</b> 5% discount to vendor fees per billing discount agreement									
7	05/20/2020	Fee	L410 Fact Witnesses	Green, Stephanie	230 00	1 80	20 70	20 70	393 30
<b>Activity:</b> A104 Review/analyze <b>Description:</b> Fact Witnesses Review/Analyze direct testimony / PUCT/Overall Case Strategy <b>Adjustment:</b> 06/09/2020 - Amount adjusted by 20 70 - system, system <b>Reason for Adjustment:</b> Discount Agreement <b>Comments to Requestor:</b> 5% discount to vendor fees per billing discount agreement									
8	05/20/2020	Fee	L120 Analysis/Strategy	Pearsall, Patrick	345 00	0 30	5 18	5 18	98 32
<b>Activity:</b> A104 Review/analyze <b>Description:</b> Analysis/Strategy Review/Analyze issues re support for rate-case expenses for 2019 proceeding / PUCT/Rate Case Expenses <b>Adjustment:</b> 06/09/2020 - Amount adjusted by 5 18 - system, system <b>Reason for Adjustment:</b> Discount Agreement <b>Comments to Requestor:</b> 5% discount to vendor fees per billing discount agreement									
9	05/20/2020	Fee	L120 Analysis/Strategy	Pearsall, Patrick	345 00	0 30	5 18	5 18	98 32
<b>Activity:</b> A104 Review/analyze <b>Description:</b> Analysis/Strategy Review/Analyze issues re preparation of application and supporting schedules / PUCT/RFP Schedules <b>Adjustment:</b> 06/09/2020 - Amount adjusted by 5 18 - system, system <b>Reason for Adjustment:</b> Discount Agreement <b>Comments to Requestor:</b> 5% discount to vendor fees per billing discount agreement									
10	05/21/2020	Fee	L410 Fact Witnesses	Pearsall, Patrick	345 00	3 60	62 10	62 10	1179 90
<b>Activity:</b> A104 Review/analyze <b>Description:</b> Fact Witnesses Review/Analyze direct testimony of R Cavazos, B Lysiak, P Osterloh, and J Jackson, and supporting schedules and exhibits / PUCT/Overall Case Strategy <b>Adjustment:</b> 06/09/2020 - Amount adjusted by 62 10 - system, system <b>Reason for Adjustment:</b> Discount Agreement <b>Comments to Requestor:</b> 5% discount to vendor fees per billing discount agreement									
11	05/22/2020	Fee	L410 Fact Witnesses	Green, Stephanie	230 00	2 10	24 15	24 15	458 85
<b>Activity:</b> A106 Communicate (with client) <b>Description:</b> Fact Witnesses Communicate with client J Frederick et al to review EECRF testimony / PUCT/Overall Case Strategy <b>Adjustment:</b> 06/09/2020 - Amount adjusted by 24 15 - system, system <b>Reason for Adjustment:</b> Discount Agreement <b>Comments to Requestor:</b> 5% discount to vendor fees per billing discount agreement									
12	05/22/2020	Fee	L210 Pleadings	Green, Stephanie	230 00	3 20	36 80	36 80	699 20
<b>Activity:</b> A103 Draft/revise <b>Description:</b> Pleadings Draft/Revise application for EECRF filing / PUCT/Non-Discovery Pleadings and Motions <b>Adjustment:</b> 06/09/2020 - Amount adjusted by 36 80 - system, system <b>Reason for Adjustment:</b> Discount Agreement <b>Comments to Requestor:</b> 5% discount to vendor fees per billing discount agreement									
13	05/22/2020	Fee	L120 Analysis/Strategy	Pearsall, Patrick	345 00	1 10	18 98	18 98	360 52
<b>Activity:</b> A104 Review/analyze <b>Description:</b> Analysis/Strategy Review/Analyze issues with testimony and supporting schedules / PUCT/RFP Schedules <b>Adjustment:</b> 06/09/2020 - Amount adjusted by 18 98 - system, system <b>Reason for Adjustment:</b> Discount Agreement <b>Comments to Requestor:</b> 5% discount to vendor fees per billing discount agreement									
14	05/22/2020	Fee	L410 Fact Witnesses	Pearsall, Patrick	345 00	2 20	37 95	37 95	721 05
<b>Activity:</b> A106 Communicate (with client) <b>Description:</b> Fact Witnesses Communicate with client litigation team re review of testimony / PUCT/Overall Case Strategy <b>Adjustment:</b> 06/09/2020 - Amount adjusted by 37 95 - system, system <b>Reason for Adjustment:</b> Discount Agreement <b>Comments to Requestor:</b> 5% discount to vendor fees per billing discount agreement									
15	05/22/2020	Fee	L210 Pleadings	Pearsall, Patrick	345 00	0 40	6 90	6 90	131 10
<b>Activity:</b> A104 Review/analyze <b>Description:</b> Pleadings Review/Analyze application / PUCT/Non-Discovery Pleadings and Motions <b>Adjustment:</b> 06/09/2020 - Amount adjusted by 6 90 - system, system <b>Reason for Adjustment:</b> Discount Agreement <b>Comments to Requestor:</b> 5% discount to vendor fees per billing discount agreement									
16	05/25/2020	Fee	L210 Pleadings	Pearsall, Patrick	345 00	0 70	12 08	12 08	229 42

				Patrick					
	<b>Activity:</b> A103 Draft/revise <b>Description:</b> Pleadings Draft/Revise application / PUCT/Non-Discovery Pleadings and Motions  <b>Adjustment:</b> 06/09/2020 - Amount adjusted by 12 08 - system, system <b>Reason for Adjustment:</b> Discount Agreement <b>Comments to Requestor:</b> 5% discount to vendor fees per billing discount agreement								
17	05/26/2020	Fee	L410 Fact Witnesses	Green, Stephanie	230 00	3 40	39 10	39 10	742 90
	<b>Activity:</b> A104 Review/analyze <b>Description:</b> Fact Witnesses Review/Analyze testimony and final schedules, relay comments re same / PUCT/Overall Case Strategy  <b>Adjustment:</b> 06/09/2020 - Amount adjusted by 39 10 - system, system <b>Reason for Adjustment:</b> Discount Agreement <b>Comments to Requestor:</b> 5% discount to vendor fees per billing discount agreement								
18	05/26/2020	Fee	L210 Pleadings	Jones, Jackie	145 00	0 40	2 90	2 90	55 10
	<b>Activity:</b> A104 Review/analyze <b>Description:</b> Pleadings Review/Analyze EECRF application / PUCT/Overall Case Strategy  <b>Adjustment:</b> 06/09/2020 - Amount adjusted by 2 90 - system, system <b>Reason for Adjustment:</b> Discount Agreement <b>Comments to Requestor:</b> 5% discount to vendor fees per billing discount agreement								
19	05/26/2020	Fee	L210 Pleadings	Jones, Jackie	145 00	0 20	1 45	1 45	27 55
	<b>Activity:</b> A103 Draft/revise <b>Description:</b> Pleadings Draft/Revise EECRF application / PUCT/Overall Case Strategy  <b>Adjustment:</b> 06/09/2020 - Amount adjusted by 1 45 - system, system <b>Reason for Adjustment:</b> Discount Agreement <b>Comments to Requestor:</b> 5% discount to vendor fees per billing discount agreement								
20	05/26/2020	Fee	L210 Pleadings	Pearsall, Patrick	345 00	2 20	37 95	37 95	721 05
	<b>Activity:</b> A103 Draft/revise <b>Description:</b> Pleadings Draft/Revise application / PUCT/Non-Discovery Pleadings and Motions  <b>Adjustment:</b> 06/09/2020 - Amount adjusted by 37 95 - system, system <b>Reason for Adjustment:</b> Discount Agreement <b>Comments to Requestor:</b> 5% discount to vendor fees per billing discount agreement								
21	05/26/2020	Fee	L120 Analysis/Strategy	Pearsall, Patrick	345 00	3 20	55 20	55 20	1048 80
	<b>Activity:</b> A104 Review/analyze <b>Description:</b> Analysis/Strategy Review/Analyze testimony, exhibits, and supporting schedules / PUCT/Overall Case Strategy  <b>Adjustment:</b> 06/09/2020 - Amount adjusted by 55 20 - system, system <b>Reason for Adjustment:</b> Discount Agreement <b>Comments to Requestor:</b> 5% discount to vendor fees per billing discount agreement								
22	05/27/2020	Fee	L210 Pleadings	Green, Stephanie	230 00	0 80	9 20	9 20	174 80
	<b>Activity:</b> A106 Communicate (with client) <b>Description:</b> Pleadings Communicate with client J Frederick et al to review EECRF final schedules / PUCT/Overall Case Strategy  <b>Adjustment:</b> 06/09/2020 - Amount adjusted by 9 20 - system, system <b>Reason for Adjustment:</b> Discount Agreement <b>Comments to Requestor:</b> 5% discount to vendor fees per billing discount agreement								
23	05/27/2020	Fee	L410 Fact Witnesses	Green, Stephanie	230 00	0 40	4 60	4 60	87 40
	<b>Activity:</b> A104 Review/analyze <b>Description:</b> Fact Witnesses Review/Analyze final drafts of testimonies / PUCT/Overall Case Strategy  <b>Adjustment:</b> 06/09/2020 - Amount adjusted by 4 60 - system, system <b>Reason for Adjustment:</b> Discount Agreement <b>Comments to Requestor:</b> 5% discount to vendor fees per billing discount agreement								
24	05/27/2020	Fee	L210 Pleadings	Green, Stephanie	230 00	0 70	8 05	8 05	152 95
	<b>Activity:</b> A104 Review/analyze <b>Description:</b> Pleadings Review/Analyze and cite check application draft for EECRF / PUCT/Non-Discovery Pleadings and Motions  <b>Adjustment:</b> 06/09/2020 - Amount adjusted by 8 05 - system, system <b>Reason for Adjustment:</b> Discount Agreement <b>Comments to Requestor:</b> 5% discount to vendor fees per billing discount agreement								
25	05/27/2020	Fee	L210 Pleadings	Green, Stephanie	230 00	1 20	13 80	13 80	262 20
	<b>Activity:</b> A104 Review/analyze <b>Description:</b> Pleadings Review/Analyze revised draft application / PUCT/Non-Discovery Pleadings and Motions  <b>Adjustment:</b> 06/09/2020 - Amount adjusted by 13 80 - system, system <b>Reason for Adjustment:</b> Discount Agreement								

	Comments to Requestor: 5% discount to vendor fees per billing discount agreement								
26	05/27/2020	Fee	L210 Pleadings	Pearsall, Patrick	345 00	0 20	3 45	3.45	65 55
	Activity: A104 Review/analyze								
	Description: Pleadings Review/Analyze amended EEPR / PUCT/Non-Discovery Pleadings and Motions								
	Adjustment: 06/09/2020 - Amount adjusted by 3 45 - system, system								
	Reason for Adjustment: Discount Agreement								
	Comments to Requestor: 5% discount to vendor fees per billing discount agreement								
27	05/27/2020	Fee	L210 Pleadings	Pearsall, Patrick	345 00	0 60	10 35	10 35	196 65
	Activity: A104 Review/analyze								
	Description: Pleadings Review/Analyze testimony and application / PUCT/Non-Discovery Pleadings and Motions								
	Adjustment: 06/09/2020 - Amount adjusted by 10 35 - system, system								
	Reason for Adjustment: Discount Agreement								
	Comments to Requestor: 5% discount to vendor fees per billing discount agreement								
28	05/27/2020	Fee	L410 Fact Witnesses	Pearsall, Patrick	345 00	0.80	13 80	13 80	262 20
	Activity: A106 Communicate (with client)								
	Description: Fact Witnesses Communicate with client litigation team re final testimony and supporting schedules / PUCT/Overall Case Strategy								
	Adjustment: 06/09/2020 - Amount adjusted by 13 80 - system, system								
	Reason for Adjustment: Discount Agreement								
	Comments to Requestor: 5% discount to vendor fees per billing discount agreement								
29	05/28/2020	Fee	L210 Pleadings	Pearsall, Patrick	345 00	0 30	5 18	5 18	98 32
	Activity: A104 Review/analyze								
	Description: Pleadings Review/Analyze issues re revised EEPR / PUCT/Non-Discovery Pleadings and Motions								
	Adjustment: 06/09/2020 - Amount adjusted by 5 18 - system, system								
	Reason for Adjustment: Discount Agreement								
	Comments to Requestor: 5% discount to vendor fees per billing discount agreement								
30	05/29/2020	Fee	L120 Analysis/Strategy	Pearsall, Patrick	345 00	0 40	6 90	6.90	131 10
	Activity: A104 Review/analyze								
	Description: Analysis/Strategy Review/Analyze final complete filing package / PUCT/Overall Case Strategy								
	Adjustment: 06/09/2020 - Amount adjusted by 6 90 - system, system								
	Reason for Adjustment: Discount Agreement								
	Comments to Requestor: 5% discount to vendor fees per billing discount agreement								

Completed Requests

Item	Request Name	Requestor	Request Date	Completion Date	Comment	Outcome
1	Post Invoice for 9,456 28 USD	Duggins Wren Mann & Romero, LLP	06/09/2020	06/11/2020		Approved
	<b>Approval History</b>					
	<b>Stop</b>	<b>Performer</b>	<b>Activity</b>	<b>Date/Time</b>	<b>Internal Comment</b>	
	1	Gage, Melissa	Approved	06/11/2020 07:49 AM		

Header Information

Invoice Number: 34384  
Vendor: Duggins Wren Mann & Romero, LLP  
Address: 600 Congress Ave Suite 1900, Austin, TX, 78701, United States of America  
Tax ID: 27-5110427  
Invoice Date: 07/09/2020  
Received Date: 07/09/2020  
Project: AEP058241-AEP Texas EECRF - Docket No 50892  
Posting Status: Posted

Billing Start Date: 06/01/2020  
Billing End Date: 06/30/2020

Submitted Total: \$9234 00  
Submitted Currency: USD  
Tax Rate: 0 00%  
PS Voucher: 00976131  
Approved Total: \$7848 85

Invoice Summary

Type	Rate x Units	Discount	AEP Disc	Adjustment	AEP Split	Tax	Amount
Fees	9234 00	0 00	1385 15	0 00	0 00	0 00	7848 85
Expenses	0 00	0 00	N/A	0 00	0 00	0 00	0 00
Invoice Total	9234 00	0 00	1385 15	0 00	0 00	0 00	7848 85

Line Items

Item	Date	Type	Category	TK	Rate	Units	Disc	Adj	Amt
1	06/01/2020	Fee	L120 Analysis/Strategy	Pearsall, Patrick	345 00	0 10	5 18	5 18	29 32
	<b>Activity:</b> A106 Communicate (with client) <b>Description:</b> Analysis/Strategy Communicate with client G Gullickson re service of application and provision of notice / PUCT/Notice Issues <b>Adjustment:</b> 07/09/2020 - Amount adjusted by 5 18 - system, system <b>Reason for Adjustment:</b> Discount Agreement <b>Comments to Requestor:</b> 15% discount to vendor fees per billing discount agreement								
2	06/02/2020	Fee	L120 Analysis/Strategy	Pearsall, Patrick	345 00	0 10	5 18	5 18	29 32
	<b>Activity:</b> A104 Review/analyze <b>Description:</b> Analysis/Strategy Review/Analyze order of referral / PUCT/Overall Case Strategy <b>Adjustment:</b> 07/09/2020 - Amount adjusted by 5 18 - system, system <b>Reason for Adjustment:</b> Discount Agreement <b>Comments to Requestor:</b> 15% discount to vendor fees per billing discount agreement								
3	06/03/2020	Fee	L210 Pleadings	Green, Stephanie	230 00	2 80	96 60	96 60	547 40
	<b>Activity:</b> A103 Draft/revise <b>Description:</b> Pleadings Draft/Revise list of issues for filing in proceeding / PUCT/Issue List, Preliminary Order <b>Adjustment:</b> 07/09/2020 - Amount adjusted by 96 60 - system, system <b>Reason for Adjustment:</b> Discount Agreement <b>Comments to Requestor:</b> 15% discount to vendor fees per billing discount agreement								
4	06/03/2020	Fee	L210 Pleadings	Pearsall, Patrick	345 00	0 40	20 70	20 70	117 30
	<b>Activity:</b> A104 Review/analyze <b>Description:</b> Pleadings Review/Analyze issues re proposed list of issues / PUCT/Overall Case Strategy <b>Adjustment:</b> 07/09/2020 - Amount adjusted by 20 70 - system, system <b>Reason for Adjustment:</b> Discount Agreement <b>Comments to Requestor:</b> 15% discount to vendor fees per billing discount agreement								
5	06/04/2020	Fee	L210 Pleadings	Jones, Jackie	145 00	0 20	4 35	4 35	24 65
	<b>Activity:</b> A104 Review/analyze <b>Description:</b> Pleadings Review/Analyze SOAH Order No 1 and update procedural calendar re same / PUCT/File and Document Management <b>Adjustment:</b> 07/09/2020 - Amount adjusted by 4 35 - system, system <b>Reason for Adjustment:</b> Discount Agreement <b>Comments to Requestor:</b> 15% discount to vendor fees per billing discount agreement								
6	06/04/2020	Fee	L210 Pleadings	Green, Stephanie	230 00	0 20	6 90	6 90	39 10
	<b>Activity:</b> A104 Review/analyze <b>Description:</b> Pleadings Review/Analyze list of issues and feedback re same / PUCT/Issue List, Preliminary Order <b>Adjustment:</b> 07/09/2020 - Amount adjusted by 6 90 - system, system <b>Reason for Adjustment:</b> Discount Agreement <b>Comments to Requestor:</b> 15% discount to vendor fees per billing discount agreement								

7	06/04/2020	Fee	L210 Pleadings	Green, Stephanie	230 00	0 20	6 90	6 90	39 10
	<b>Activity:</b> A103 Draft/revise <b>Description:</b> Pleadings Draft/Revise list of issues per feedback / PUCT/Issue List, Preliminary Order  <b>Adjustment:</b> 07/09/2020 - Amount adjusted by 6 90 - system, system <b>Reason for Adjustment:</b> Discount Agreement <b>Comments to Requestor:</b> 15% discount to vendor fees per billing discount agreement								
8	06/04/2020	Fee	L210 Pleadings	Pearsall, Patrick	345 00	0 20	10 35	10 35	58 65
	<b>Activity:</b> A104 Review/analyze <b>Description:</b> Pleadings Review/Analyze issues re proposed list of issues / PUCT/Overall Case Strategy  <b>Adjustment:</b> 07/09/2020 - Amount adjusted by 10 35 - system, system <b>Reason for Adjustment:</b> Discount Agreement <b>Comments to Requestor:</b> 15% discount to vendor fees per billing discount agreement								
9	06/04/2020	Fee	L210 Pleadings	Pearsall, Patrick	345 00	0 10	5 18	5 18	29 32
	<b>Activity:</b> A104 Review/analyze <b>Description:</b> Pleadings Review/Analyze Cities' motion to intervene / PUCT/Overall Case Strategy  <b>Adjustment:</b> 07/09/2020 - Amount adjusted by 5 18 - system, system <b>Reason for Adjustment:</b> Discount Agreement <b>Comments to Requestor:</b> 15% discount to vendor fees per billing discount agreement								
10	06/05/2020	Fee	L210 Pleadings	Pearsall, Patrick	345 00	0 30	15 52	15 52	87 98
	<b>Activity:</b> A104 Review/analyze <b>Description:</b> Pleadings Review/Analyze J Frederick affidavit in support of proof of notice / PUCT/Notice Issues  <b>Adjustment:</b> 07/09/2020 - Amount adjusted by 15 52 - system, system <b>Reason for Adjustment:</b> Discount Agreement <b>Comments to Requestor:</b> 15% discount to vendor fees per billing discount agreement								
11	06/08/2020	Fee	L190 Other Case Assessment, Dev and Admin	Green, Stephanie	230 00	0 10	3 45	3 45	19 55
	<b>Activity:</b> A104 Review/analyze <b>Description:</b> Other Case Assess/Develop/Admin Review/Analyze recommendation on sufficiency of notice / PUCT/Notice Issues  <b>Adjustment:</b> 07/09/2020 - Amount adjusted by 3 45 - system, system <b>Reason for Adjustment:</b> Discount Agreement <b>Comments to Requestor:</b> 15% discount to vendor fees per billing discount agreement								
12	06/08/2020	Fee	L120 Analysis/Strategy	Pearsall, Patrick	345 00	0 20	10 35	10 35	58 65
	<b>Activity:</b> A104 Review/analyze <b>Description:</b> Analysis/Strategy Review/Analyze Commission Staff recommendation re adequacy of notice / PUCT/Notice Issues  <b>Adjustment:</b> 07/09/2020 - Amount adjusted by 10 35 - system, system <b>Reason for Adjustment:</b> Discount Agreement <b>Comments to Requestor:</b> 15% discount to vendor fees per billing discount agreement								
13	06/09/2020	Fee	L210 Pleadings	Pearsall, Patrick	345 00	0 10	5 18	5 18	29 32
	<b>Activity:</b> A104 Review/analyze <b>Description:</b> Pleadings Review/Analyze TIEC motion to intervene / PUCT/Overall Case Strategy  <b>Adjustment:</b> 07/09/2020 - Amount adjusted by 5 18 - system, system <b>Reason for Adjustment:</b> Discount Agreement <b>Comments to Requestor:</b> 15% discount to vendor fees per billing discount agreement								
14	06/10/2020	Fee	L210 Pleadings	Green, Stephanie	230 00	0 30	10 35	10 35	58 65
	<b>Activity:</b> A103 Draft/revise <b>Description:</b> Pleadings Draft/Revise draft issues list and prepare for filing / PUCT/Issue List, Preliminary Order  <b>Adjustment:</b> 07/09/2020 - Amount adjusted by 10 35 - system, system <b>Reason for Adjustment:</b> Discount Agreement <b>Comments to Requestor:</b> 15% discount to vendor fees per billing discount agreement								
15	06/10/2020	Fee	L210 Pleadings	Pearsall, Patrick	345 00	0 20	10 35	10 35	58.65
	<b>Activity:</b> A104 Review/analyze <b>Description:</b> Pleadings Review/Analyze proposed revisions to list of issues / PUCT/Issue List, Preliminary Order  <b>Adjustment:</b> 07/09/2020 - Amount adjusted by 10 35 - system, system <b>Reason for Adjustment:</b> Discount Agreement <b>Comments to Requestor:</b> 15% discount to vendor fees per billing discount agreement								
16	06/10/2020	Fee	L210 Pleadings	Pearsall, Patrick	345 00	0 10	5 18	5 18	29 32
	<b>Activity:</b> A106 Communicate (with client)								

			<b>Description:</b> Pleadings Communicate with client P Osterloh and litigation team re proposed list of issues / PUCT/Issue List, Preliminary Order <b>Adjustment:</b> 07/09/2020 - Amount adjusted by 5 18 - system, system <b>Reason for Adjustment:</b> Discount Agreement <b>Comments to Requestor:</b> 15% discount to vendor fees per billing discount agreement						
17	06/11/2020	Fee	L210 Pleadings	Green, Stephanie	230 00	0 20	6 90	6 90	39 10
			<b>Activity:</b> A103 Draft/revise <b>Description:</b> Pleadings Draft/Revise and finalize list of issues for filing / PUCT/Issue List, Preliminary Order <b>Adjustment:</b> 07/09/2020 - Amount adjusted by 6 90 - system, system <b>Reason for Adjustment:</b> Discount Agreement <b>Comments to Requestor:</b> 15% discount to vendor fees per billing discount agreement						
18	06/12/2020	Fee	L210 Pleadings	Jones, Jackie	145 00	0 20	4 35	4 35	24 65
			<b>Activity:</b> A104 Review/analyze <b>Description:</b> Pleadings Review/Analyze lists of issues / PUCT/File and Document Management <b>Adjustment:</b> 07/09/2020 - Amount adjusted by 4 35 - system, system <b>Reason for Adjustment:</b> Discount Agreement <b>Comments to Requestor:</b> 15% discount to vendor fees per billing discount agreement						
19	06/12/2020	Fee	L250 Other Written Motions/Submissions	Green, Stephanie	230 00	0 70	24 15	24 15	136 85
			<b>Activity:</b> A103 Draft/revise <b>Description:</b> Other Written Motions and Submissions Draft/Revise procedural schedule and motion to cancel hearing / PUCT/Pre-Hearing Conferences <b>Adjustment:</b> 07/09/2020 - Amount adjusted by 24 15 - system, system <b>Reason for Adjustment:</b> Discount Agreement <b>Comments to Requestor:</b> 15% discount to vendor fees per billing discount agreement						
20	06/12/2020	Fee	L120 Analysis/Strategy	Pearsall, Patrick	345 00	0 30	15 52	15 52	87 98
			<b>Activity:</b> A106 Communicate (with client) <b>Description:</b> Analysis/Strategy Communicate with client M Gage re procedural schedule issues / PUCT/Other Rate Case Procedural Matters <b>Adjustment:</b> 07/09/2020 - Amount adjusted by 15 52 - system, system <b>Reason for Adjustment:</b> Discount Agreement <b>Comments to Requestor:</b> 15% discount to vendor fees per billing discount agreement						
21	06/12/2020	Fee	L120 Analysis/Strategy	Pearsall, Patrick	345 00	1 30	67 28	67 28	381 22
			<b>Activity:</b> A108 Communicate (other external) <b>Description:</b> Analysis/Strategy Communicate with other external Staff counsel J Adkins, TIEC counsel J Zhu, and Cities counsel J Mauldin re procedural schedule issues / PUCT/Other Rate Case Procedural Matters <b>Adjustment:</b> 07/09/2020 - Amount adjusted by 67 28 - system, system <b>Reason for Adjustment:</b> Discount Agreement <b>Comments to Requestor:</b> 15% discount to vendor fees per billing discount agreement						
22	06/12/2020	Fee	L210 Pleadings	Pearsall, Patrick	345 00	1 80	93 15	93 15	527 85
			<b>Activity:</b> A103 Draft/revise <b>Description:</b> Pleadings Draft/Revise agreed procedural schedule and motion to cancel prehearing conference / PUCT/Pre-Hearing Conferences <b>Adjustment:</b> 07/09/2020 - Amount adjusted by 93 15 - system, system <b>Reason for Adjustment:</b> Discount Agreement <b>Comments to Requestor:</b> 15% discount to vendor fees per billing discount agreement						
23	06/12/2020	Fee	L210 Pleadings	Pearsall, Patrick	345 00	0 20	10 35	10 35	58 65
			<b>Activity:</b> A104 Review/analyze <b>Description:</b> Pleadings Review/Analyze final proposed list of issues / PUCT/Issue List, Preliminary Order <b>Adjustment:</b> 07/09/2020 - Amount adjusted by 10 35 - system, system <b>Reason for Adjustment:</b> Discount Agreement <b>Comments to Requestor:</b> 15% discount to vendor fees per billing discount agreement						
24	06/12/2020	Fee	L210 Pleadings	Pearsall, Patrick	345 00	0 20	10 35	10 35	58 65
			<b>Activity:</b> A104 Review/analyze <b>Description:</b> Pleadings Review/Analyze Cities' proposed list of issues / PUCT/Issue List, Preliminary Order <b>Adjustment:</b> 07/09/2020 - Amount adjusted by 10 35 - system, system <b>Reason for Adjustment:</b> Discount Agreement <b>Comments to Requestor:</b> 15% discount to vendor fees per billing discount agreement						
25	06/14/2020	Fee	L250 Other Written Motions/Submissions	Green, Stephanie	230 00	0 20	6 90	6 90	39 10

	<b>Activity:</b> A103 Draft/revise <b>Description:</b> Other Written Motions and Submissions Draft/Revise pleading re procedural schedule and motion to cancel prehearing conference / PUCT/Pre-Hearing Conferences  <b>Adjustment:</b> 07/09/2020 - Amount adjusted by 6 90 - system, system <b>Reason for Adjustment:</b> Discount Agreement <b>Comments to Requestor:</b> 15% discount to vendor fees per billing discount agreement								
26	06/14/2020	Fee	L210 Pleadings	Pearsall, Patrick	345 00	0 30	15 52	15 52	87 98
	<b>Activity:</b> A103 Draft/revise <b>Description:</b> Pleadings Draft/Revise agreed procedural schedule and motion to cancel prehearing conference / PUCT/Pre-Hearing Conferences  <b>Adjustment:</b> 07/09/2020 - Amount adjusted by 15 52 - system, system <b>Reason for Adjustment:</b> Discount Agreement <b>Comments to Requestor:</b> 15% discount to vendor fees per billing discount agreement								
27	06/15/2020	Fee	L140 Document/File Management	Jones, Jackie	145 00	0 20	4 35	4 35	24 65
	<b>Activity:</b> A103 Draft/revise <b>Description:</b> Document/File Management Draft/Revise list of persons subject to protective order / PUCT/File and Document Management  <b>Adjustment:</b> 07/09/2020 - Amount adjusted by 4 35 - system, system <b>Reason for Adjustment:</b> Discount Agreement <b>Comments to Requestor:</b> 15% discount to vendor fees per billing discount agreement								
28	06/15/2020	Fee	L120 Analysis/Strategy	Pearsall, Patrick	345 00	0 10	5 18	5 18	29 32
	<b>Activity:</b> A108 Communicate (other external) <b>Description:</b> Analysis/Strategy Communicate with other external Staff counsel J Adkins re prehearing conference / PUCT/Pre-Hearing Conferences  <b>Adjustment:</b> 07/09/2020 - Amount adjusted by 5 18 - system, system <b>Reason for Adjustment:</b> Discount Agreement <b>Comments to Requestor:</b> 15% discount to vendor fees per billing discount agreement								
29	06/15/2020	Fee	L120 Analysis/Strategy	Pearsall, Patrick	345 00	0 10	5 18	5 18	29 32
	<b>Activity:</b> A106 Communicate (with client) <b>Description:</b> Analysis/Strategy Communicate with client G Gullickson re status of prehearing conference / PUCT/Pre-Hearing Conferences  <b>Adjustment:</b> 07/09/2020 - Amount adjusted by 5 18 - system, system <b>Reason for Adjustment:</b> Discount Agreement <b>Comments to Requestor:</b> 15% discount to vendor fees per billing discount agreement								
30	06/15/2020	Fee	L310 Written Discovery	Pearsall, Patrick	345 00	0 20	10 35	10 35	58 65
	<b>Activity:</b> A106 Communicate (with client) <b>Description:</b> Written Discovery Communicate with client J Frederick re Cities 1st set of RFIs / PUCT/Discovery  <b>Adjustment:</b> 07/09/2020 - Amount adjusted by 10 35 - system, system <b>Reason for Adjustment:</b> Discount Agreement <b>Comments to Requestor:</b> 15% discount to vendor fees per billing discount agreement								
31	06/15/2020	Fee	L210 Pleadings	Pearsall, Patrick	345 00	0 20	10 35	10 35	58 65
	<b>Activity:</b> A104 Review/analyze <b>Description:</b> Pleadings Review/Analyze Staff recommendation re sufficiency of application / PUCT/Overall Case Strategy  <b>Adjustment:</b> 07/09/2020 - Amount adjusted by 10 35 - system, system <b>Reason for Adjustment:</b> Discount Agreement <b>Comments to Requestor:</b> 15% discount to vendor fees per billing discount agreement								
32	06/16/2020	Fee	L210 Pleadings	Jones, Jackie	145 00	0 20	4 35	4 35	24 65
	<b>Activity:</b> A104 Review/analyze <b>Description:</b> Pleadings Review/Analyze SOAH Order No 2 and update procedural calendar re same / PUCT/File and Document Management  <b>Adjustment:</b> 07/09/2020 - Amount adjusted by 4 35 - system, system <b>Reason for Adjustment:</b> Discount Agreement <b>Comments to Requestor:</b> 15% discount to vendor fees per billing discount agreement								
33	06/16/2020	Fee	L140 Document/File Management	Jones, Jackie	145 00	0 20	4 35	4 35	24 65
	<b>Activity:</b> A103 Draft/revise <b>Description:</b> Document/File Management Draft/Revise list of persons subject to protective order / PUCT/File and Document Management  <b>Adjustment:</b> 07/09/2020 - Amount adjusted by 4 35 - system, system <b>Reason for Adjustment:</b> Discount Agreement								

Comments to Requestor: 15% discount to vendor fees per billing discount agreement									
34	06/16/2020	Fee	L310 Written Discovery	Jones, Jackie	145 00	0 10	2 18	2 18	12 32
	Activity: A104 Review/analyze								
	Description: Written Discovery Review/Analyze Staff's 1st RFI and update procedural calendar re same / PUCT/Discovery								
	Adjustment: 07/09/2020 - Amount adjusted by 2 18 - system, system								
	Reason for Adjustment: Discount Agreement								
Comments to Requestor: 15% discount to vendor fees per billing discount agreement									
35	06/16/2020	Fee	L310 Written Discovery	Pearsall, Patrick	345 00	0 10	5 18	5 18	29 32
	Activity: A104 Review/analyze								
	Description: Written Discovery Review/Analyze Staff's 1st set of RFIs / PUCT/Discovery								
	Adjustment: 07/09/2020 - Amount adjusted by 5 18 - system, system								
	Reason for Adjustment: Discount Agreement								
Comments to Requestor: 15% discount to vendor fees per billing discount agreement									
36	06/17/2020	Fee	L310 Written Discovery	Green, Stephanie	230 00	0 10	3 45	3 45	19 55
	Activity: A106 Communicate (with client)								
	Description: Written Discovery Communicate with client P Osterloh re Cities' 1st RFI / PUCT/Discovery								
	Adjustment: 07/09/2020 - Amount adjusted by 3 45 - system, system								
	Reason for Adjustment: Discount Agreement								
Comments to Requestor: 15% discount to vendor fees per billing discount agreement									
37	06/17/2020	Fee	L310 Written Discovery	Green, Stephanie	230 00	0 10	3 45	3 45	19 55
	Activity: A104 Review/analyze								
	Description: Written Discovery Review/Analyze issues re Cities' 1st RFI / PUCT/Discovery								
	Adjustment: 07/09/2020 - Amount adjusted by 3 45 - system, system								
	Reason for Adjustment: Discount Agreement								
Comments to Requestor: 15% discount to vendor fees per billing discount agreement									
38	06/17/2020	Fee	L310 Written Discovery	Pearsall, Patrick	345 00	0 10	5 18	5 18	29 32
	Activity: A106 Communicate (with client)								
	Description: Written Discovery Communicate with client P Osterloh re scope of and potential objections to Cities' 1st set of RFIs / PUCT/Discovery								
	Adjustment: 07/09/2020 - Amount adjusted by 5 18 - system, system								
	Reason for Adjustment: Discount Agreement								
Comments to Requestor: 15% discount to vendor fees per billing discount agreement									
39	06/17/2020	Fee	L310 Written Discovery	Pearsall, Patrick	345 00	0 10	5 18	5 18	29 32
	Activity: A104 Review/analyze								
	Description: Written Discovery Review/Analyze issues re potential objections to Cities' 1st set of RFIs / PUCT/Discovery								
	Adjustment: 07/09/2020 - Amount adjusted by 5 18 - system, system								
	Reason for Adjustment: Discount Agreement								
Comments to Requestor: 15% discount to vendor fees per billing discount agreement									
40	06/18/2020	Fee	L310 Written Discovery	Green, Stephanie	230 00	0 30	10 35	10 35	58 65
	Activity: A106 Communicate (with client)								
	Description: Written Discovery Communicate with client J Fredericks, P Osterloh, R Cavazos et al re Cities' 1st RFI / PUCT/Discovery								
	Adjustment: 07/09/2020 - Amount adjusted by 10 35 - system, system								
	Reason for Adjustment: Discount Agreement								
Comments to Requestor: 15% discount to vendor fees per billing discount agreement									
41	06/18/2020	Fee	L310 Written Discovery	Green, Stephanie	230 00	0 20	6 90	6 90	39 10
	Activity: A104 Review/analyze								
	Description: Written Discovery Review/Analyze issue and EECRF dockets re response to Cities' 1st RFI / PUCT/Discovery								
	Adjustment: 07/09/2020 - Amount adjusted by 6 90 - system, system								
	Reason for Adjustment: Discount Agreement								
Comments to Requestor: 15% discount to vendor fees per billing discount agreement									
42	06/18/2020	Fee	L190 Other Case Assessment, Dev and Admin	Green, Stephanie	230 00	0 20	6 90	6 90	39 10
	Activity: A104 Review/analyze								
	Description: Other Case Assess/Develop/Admin Review/Analyze and update status of case and pending discovery deadlines / PUCT/Overall Case Administration								
	Adjustment: 07/09/2020 - Amount adjusted by 6 90 - system, system								
	Reason for Adjustment: Discount Agreement								



<b>Comments to Requestor:</b> 15% discount to vendor fees per billing discount agreement									
43	06/18/2020	Fee	L310 Written Discovery	Pearsall, Patrick	345 00	0 30	15 52	15 52	87 98
<b>Activity:</b> A106 Communicate (with client) <b>Description:</b> Written Discovery Communicate with client J. Frederick, P. Osterloh, and R. Cavazos re strategy for responses and potential objections to Cities' 1st set of RFIs / PUCT/Discovery. <b>Adjustment:</b> 07/09/2020 - Amount adjusted by 15 52 - system, system <b>Reason for Adjustment:</b> Discount Agreement <b>Comments to Requestor:</b> 15% discount to vendor fees per billing discount agreement									
44	06/19/2020	Fee	L120 Analysis/Strategy	Pearsall, Patrick	345 00	0 20	10 35	10 35	58 65
<b>Activity:</b> A108 Communicate (other external) <b>Description:</b> Analysis/Strategy Communicate with other external Cities' counsel P. Dinnin re confidential materials included with EECRF application / PUCT/Overall Case Strategy <b>Adjustment:</b> 07/09/2020 - Amount adjusted by 10 35 - system, system <b>Reason for Adjustment:</b> Discount Agreement <b>Comments to Requestor:</b> 15% discount to vendor fees per billing discount agreement									
45	06/19/2020	Fee	L120 Analysis/Strategy	Pearsall, Patrick	345 00	0 10	5 18	5 18	29 32
<b>Activity:</b> A108 Communicate (other external) <b>Description:</b> Analysis/Strategy Communicate with other external G. Gullickson re Cities' request for access to confidential materials / PUCT/Overall Case Strategy <b>Adjustment:</b> 07/09/2020 - Amount adjusted by 5 18 - system, system <b>Reason for Adjustment:</b> Discount Agreement <b>Comments to Requestor:</b> 15% discount to vendor fees per billing discount agreement									
46	06/22/2020	Fee	L310 Written Discovery	Green, Stephanie	230 00	0 20	6 90	6 90	39 10
<b>Activity:</b> A104 Review/analyze <b>Description:</b> Written Discovery Review/Analyze RFI issues prior to client call with R. Fahrlander and P. Osterloh / PUCT/Discovery <b>Adjustment:</b> 07/09/2020 - Amount adjusted by 6 90 - system, system <b>Reason for Adjustment:</b> Discount Agreement <b>Comments to Requestor:</b> 15% discount to vendor fees per billing discount agreement									
47	06/22/2020	Fee	L310 Written Discovery	Green, Stephanie	230 00	0 40	13 80	13 80	78 20
<b>Activity:</b> A106 Communicate (with client) <b>Description:</b> Written Discovery Communicate with client R. Fahrlander, P. Osterloh re Staff's 1st RFI / PUCT/Discovery <b>Adjustment:</b> 07/09/2020 - Amount adjusted by 13 80 - system, system <b>Reason for Adjustment:</b> Discount Agreement <b>Comments to Requestor:</b> 15% discount to vendor fees per billing discount agreement									
48	06/22/2020	Fee	L310 Written Discovery	Green, Stephanie	230 00	0 60	20 70	20 70	117 30
<b>Activity:</b> A104 Review/analyze <b>Description:</b> Written Discovery Review/Analyze draft responses to Cities' 1st RFI and prepare notes re same / PUCT/Discovery <b>Adjustment:</b> 07/09/2020 - Amount adjusted by 20 70 - system, system <b>Reason for Adjustment:</b> Discount Agreement <b>Comments to Requestor:</b> 15% discount to vendor fees per billing discount agreement									
49	06/22/2020	Fee	L250 Other Written Motions/Submissions	Green, Stephanie	230 00	0 20	6 90	6 90	39 10
<b>Activity:</b> A104 Review/analyze <b>Description:</b> Other Written Motions and Submissions Review/Analyze draft preliminary order and compare issues to parties' requested issues / PUCT/Issue List, Preliminary Order <b>Adjustment:</b> 07/09/2020 - Amount adjusted by 6 90 - system, system <b>Reason for Adjustment:</b> Discount Agreement <b>Comments to Requestor:</b> 15% discount to vendor fees per billing discount agreement									
50	06/22/2020	Fee	L160 Settlement/Non-Binding ADR	Pearsall, Patrick	345 00	0 30	15 52	15 52	87 98
<b>Activity:</b> A106 Communicate (with client) <b>Description:</b> Settlement/Non-binding ADR Communicate with client litigation team re coordinating settlement conference / PUCT/Settlement Activities <b>Adjustment:</b> 07/09/2020 - Amount adjusted by 15 52 - system, system <b>Reason for Adjustment:</b> Discount Agreement <b>Comments to Requestor:</b> 15% discount to vendor fees per billing discount agreement									
51	06/22/2020	Fee	L120 Analysis/Strategy	Pearsall, Patrick	345 00	0 20	10 35	10 35	58 65
<b>Activity:</b> A104 Review/analyze <b>Description:</b> Analysis/Strategy Review/Analyze preliminary order / PUCT/Issue List, Preliminary Order <b>Adjustment:</b> 07/09/2020 - Amount adjusted by 10 35 - system, system									

	<b>Reason for Adjustment:</b> Discount Agreement <b>Comments to Requestor:</b> 15% discount to vendor fees per billing discount agreement								
52	06/23/2020	Fee	L310 Written Discovery	Jones, Jackie	145 00	0 20	4 35	4 35	24 65
	<b>Activity:</b> A104 Review/analyze <b>Description:</b> Written Discovery Review/Analyze Staff's 2nd RFIs and update procedural calendar re same / PUCT/Discovery <b>Adjustment:</b> 07/09/2020 - Amount adjusted by 4 35 - system, system <b>Reason for Adjustment:</b> Discount Agreement <b>Comments to Requestor:</b> 15% discount to vendor fees per billing discount agreement								
53	06/23/2020	Fee	L310 Written Discovery	Green, Stephanie	230 00	0 80	27 60	27 60	156 40
	<b>Activity:</b> A106 Communicate (with client) <b>Description:</b> Written Discovery Communicate with client J Frederick et al re Cities' 1st RFI review / PUCT/Discovery <b>Adjustment:</b> 07/09/2020 - Amount adjusted by 27 60 - system, system <b>Reason for Adjustment:</b> Discount Agreement <b>Comments to Requestor:</b> 15% discount to vendor fees per billing discount agreement								
54	06/23/2020	Fee	L310 Written Discovery	Green, Stephanie	230 00	0 20	6 90	6 90	39 10
	<b>Activity:</b> A104 Review/analyze <b>Description:</b> Written Discovery Review/Analyze revisions to Cities' 1st RFI / PUCT/Discovery <b>Adjustment:</b> 07/09/2020 - Amount adjusted by 6 90 - system, system <b>Reason for Adjustment:</b> Discount Agreement <b>Comments to Requestor:</b> 15% discount to vendor fees per billing discount agreement								
55	06/23/2020	Fee	L310 Written Discovery	Green, Stephanie	230 00	0 10	3 45	3 45	19 55
	<b>Activity:</b> A106 Communicate (with client) <b>Description:</b> Written Discovery Communicate with client J Frederick re revisions to Cities' 1st RFI responses / PUCT/Discovery <b>Adjustment:</b> 07/09/2020 - Amount adjusted by 3 45 - system, system <b>Reason for Adjustment:</b> Discount Agreement <b>Comments to Requestor:</b> 15% discount to vendor fees per billing discount agreement								
56	06/23/2020	Fee	L310 Written Discovery	Green, Stephanie	230 00	0 10	3 45	3 45	19 55
	<b>Activity:</b> A104 Review/analyze <b>Description:</b> Written Discovery Review/Analyze communication with M Gage re Cities' 1st RFI / PUCT/Discovery <b>Adjustment:</b> 07/09/2020 - Amount adjusted by 3 45 - system, system <b>Reason for Adjustment:</b> Discount Agreement <b>Comments to Requestor:</b> 15% discount to vendor fees per billing discount agreement								
57	06/23/2020	Fee	L190 Other Case Assessment, Dev and Admin	Green, Stephanie	230 00	0 10	3 45	3 45	19 55
	<b>Activity:</b> A104 Review/analyze <b>Description:</b> Other Case Assess/Develop/Admin Review/Analyze update and status of matter and discovery / PUCT/Overall Case Administration <b>Adjustment:</b> 07/09/2020 - Amount adjusted by 3 45 - system, system <b>Reason for Adjustment:</b> Discount Agreement <b>Comments to Requestor:</b> 15% discount to vendor fees per billing discount agreement								
58	06/23/2020	Fee	L310 Written Discovery	Green, Stephanie	230 00	0 10	3 45	3 45	19 55
	<b>Activity:</b> A106 Communicate (with client) <b>Description:</b> Written Discovery Communicate with client J Frederick re edits to RFI responses / PUCT/Discovery <b>Adjustment:</b> 07/09/2020 - Amount adjusted by 3 45 - system, system <b>Reason for Adjustment:</b> Discount Agreement <b>Comments to Requestor:</b> 15% discount to vendor fees per billing discount agreement								
59	06/23/2020	Fee	L310 Written Discovery	Pearsall, Patrick	345 00	0 80	41 40	41 40	234 60
	<b>Activity:</b> A106 Communicate (with client) <b>Description:</b> Written Discovery Communicate with client litigation team re review of responses to Cities' 1st set of RFIs / PUCT/Discovery <b>Adjustment:</b> 07/09/2020 - Amount adjusted by 41 40 - system, system <b>Reason for Adjustment:</b> Discount Agreement <b>Comments to Requestor:</b> 15% discount to vendor fees per billing discount agreement								
60	06/23/2020	Fee	L310 Written Discovery	Pearsall, Patrick	345 00	0 50	25 88	25 88	146 62
	<b>Activity:</b> A104 Review/analyze <b>Description:</b> Written Discovery Review/Analyze responses to Cities' 1st set of RFIs / PUCT/Discovery <b>Adjustment:</b> 07/09/2020 - Amount adjusted by 25 88 - system, system <b>Reason for Adjustment:</b> Discount Agreement								

<b>Comments to Requestor:</b> 15% discount to vendor fees per billing discount agreement									
61	06/23/2020	Fee	L160 Settlement/Non-Binding ADR	Pearsall, Patrick	345 00	0 40	20 70	20 70	117 30
<b>Activity:</b> A108 Communicate (other external) <b>Description:</b> Settlement/Non-binding ADR Communicate with other external counsel for Staff, TIEC, and Cities re settlement conference / PUCT/Settlement Activities <b>Adjustment:</b> 07/09/2020 - Amount adjusted by 20 70 - system, system <b>Reason for Adjustment:</b> Discount Agreement <b>Comments to Requestor:</b> 15% discount to vendor fees per billing discount agreement									
62	06/23/2020	Fee	L310 Written Discovery	Pearsall, Patrick	345 00	0 30	15 52	15 52	87 98
<b>Activity:</b> A106 Communicate (with client) <b>Description:</b> Written Discovery Communicate with client M Gage re responses and revisions to Cities' 1st set of RFIs / PUCT/Discovery <b>Adjustment:</b> 07/09/2020 - Amount adjusted by 15 52 - system, system <b>Reason for Adjustment:</b> Discount Agreement <b>Comments to Requestor:</b> 15% discount to vendor fees per billing discount agreement									
63	06/24/2020	Fee	L310 Written Discovery	Green, Stephanie	230 00	0 20	6 90	6 90	39 10
<b>Activity:</b> A106 Communicate (with client) <b>Description:</b> Written Discovery Communicate with client J Jackson et al re Staff 2nd RFI / PUCT/Discovery <b>Adjustment:</b> 07/09/2020 - Amount adjusted by 6 90 - system, system <b>Reason for Adjustment:</b> Discount Agreement <b>Comments to Requestor:</b> 15% discount to vendor fees per billing discount agreement									
64	06/24/2020	Fee	L310 Written Discovery	Green, Stephanie	230 00	0 40	13 80	13 80	78 20
<b>Activity:</b> A104 Review/analyze <b>Description:</b> Written Discovery Review/Analyze response and attachments to Staff 2nd RFI / PUCT/Discovery <b>Adjustment:</b> 07/09/2020 - Amount adjusted by 13 80 - system, system <b>Reason for Adjustment:</b> Discount Agreement <b>Comments to Requestor:</b> 15% discount to vendor fees per billing discount agreement									
65	06/24/2020	Fee	L310 Written Discovery	Green, Stephanie	230 00	0 20	6 90	6 90	39 10
<b>Activity:</b> A106 Communicate (with client) <b>Description:</b> Written Discovery Communicate with client J Jackson, R Fahrlander re Staff 1st RFI / PUCT/Discovery <b>Adjustment:</b> 07/09/2020 - Amount adjusted by 6 90 - system, system <b>Reason for Adjustment:</b> Discount Agreement <b>Comments to Requestor:</b> 15% discount to vendor fees per billing discount agreement									
66	06/24/2020	Fee	L310 Written Discovery	Green, Stephanie	230 00	0 60	20 70	20 70	117 30
<b>Activity:</b> A104 Review/analyze <b>Description:</b> Written Discovery Review/Analyze responsive documents re Staff 1st RFI / PUCT/Discovery <b>Adjustment:</b> 07/09/2020 - Amount adjusted by 20 70 - system, system <b>Reason for Adjustment:</b> Discount Agreement <b>Comments to Requestor:</b> 15% discount to vendor fees per billing discount agreement									
67	06/24/2020	Fee	L310 Written Discovery	Pearsall, Patrick	345 00	1 20	62 10	62 10	351 90
<b>Activity:</b> A104 Review/analyze <b>Description:</b> Written Discovery Review/Analyze issues re responses to Staff's 1st and 2nd sets of RFIs / PUCT/Discovery <b>Adjustment:</b> 07/09/2020 - Amount adjusted by 62 10 - system, system <b>Reason for Adjustment:</b> Discount Agreement <b>Comments to Requestor:</b> 15% discount to vendor fees per billing discount agreement									
68	06/24/2020	Fee	L310 Written Discovery	Pearsall, Patrick	345 00	0 60	31 05	31 05	175 95
<b>Activity:</b> A106 Communicate (with client) <b>Description:</b> Written Discovery Communicate with client P Osterloh, R Fahrlander and litigation team re responses to Staff's 1st and 2nd sets of RFIs / PUCT/Discovery <b>Adjustment:</b> 07/09/2020 - Amount adjusted by 31 05 - system, system <b>Reason for Adjustment:</b> Discount Agreement <b>Comments to Requestor:</b> 15% discount to vendor fees per billing discount agreement									
69	06/25/2020	Fee	L310 Written Discovery	Green, Stephanie	230 00	0 30	10 35	10 35	58 65
<b>Activity:</b> A104 Review/analyze <b>Description:</b> Written Discovery Review/Analyze responses and documents re Staff 1-1 / PUCT/Discovery <b>Adjustment:</b> 07/09/2020 - Amount adjusted by 10 35 - system, system <b>Reason for Adjustment:</b> Discount Agreement <b>Comments to Requestor:</b> 15% discount to vendor fees per billing discount agreement									

70	06/25/2020	Fee	L310 Written Discovery	Green, Stephanie	230 00	0 20	6 90	6.90	39 10
	<b>Activity:</b> A106 Communicate (with client)								
	<b>Description:</b> Written Discovery Communicate with client re revisions and review re Staff's 1st RFI / PUCT/Discovery								
	<b>Adjustment:</b> 07/09/2020 - Amount adjusted by 6 90 - system, system <b>Reason for Adjustment:</b> Discount Agreement <b>Comments to Requestor:</b> 15% discount to vendor fees per billing discount agreement								
71	06/25/2020	Fee	L310 Written Discovery	Green, Stephanie	230 00	0 20	6 90	6.90	39 10
	<b>Activity:</b> A106 Communicate (with client)								
	<b>Description:</b> Written Discovery Communicate with client re Staff's 2nd RFI / PUCT/Discovery								
	<b>Adjustment:</b> 07/09/2020 - Amount adjusted by 6 90 - system, system <b>Reason for Adjustment:</b> Discount Agreement <b>Comments to Requestor:</b> 15% discount to vendor fees per billing discount agreement								
72	06/25/2020	Fee	L310 Written Discovery	Pearsall, Patrick	345 00	1 10	56 92	56.92	322 58
	<b>Activity:</b> A104 Review/analyze								
	<b>Description:</b> Written Discovery Review/Analyze exhibits responsive to Staff's 1st RFIs / PUCT/Discovery								
	<b>Adjustment:</b> 07/09/2020 - Amount adjusted by 56 92 - system, system <b>Reason for Adjustment:</b> Discount Agreement <b>Comments to Requestor:</b> 15% discount to vendor fees per billing discount agreement								
73	06/25/2020	Fee	L310 Written Discovery	Pearsall, Patrick	345 00	0 50	25 88	25.88	146 62
	<b>Activity:</b> A106 Communicate (with client)								
	<b>Description:</b> Written Discovery Communicate with client J. Frederick, J. Jackson, P. Osterloh, and R. Fahrlander re finalizing responses to Staff's 1st and 2nd set of RFIs / PUCT/Discovery								
	<b>Adjustment:</b> 07/09/2020 - Amount adjusted by 25 88 - system, system <b>Reason for Adjustment:</b> Discount Agreement <b>Comments to Requestor:</b> 15% discount to vendor fees per billing discount agreement								
74	06/25/2020	Fee	L310 Written Discovery	Pearsall, Patrick	345 00	0 10	5 18	5.18	29 32
	<b>Activity:</b> A108 Communicate (other external)								
	<b>Description:</b> Written Discovery Communicate with other external Cities' counsel P. Dinnin re service of responses to Cities' 1st set of RFIs / PUCT/Discovery								
	<b>Adjustment:</b> 07/09/2020 - Amount adjusted by 5 18 - system, system <b>Reason for Adjustment:</b> Discount Agreement <b>Comments to Requestor:</b> 15% discount to vendor fees per billing discount agreement								
75	06/25/2020	Fee	L310 Written Discovery	Pearsall, Patrick	345 00	0 20	10 35	10.35	58 65
	<b>Activity:</b> A106 Communicate (with client)								
	<b>Description:</b> Written Discovery Communicate with client J. Frederick re service of responses to Cities' 1st set of RFIs / PUCT/Discovery								
	<b>Adjustment:</b> 07/09/2020 - Amount adjusted by 10 35 - system, system <b>Reason for Adjustment:</b> Discount Agreement <b>Comments to Requestor:</b> 15% discount to vendor fees per billing discount agreement								
76	06/26/2020	Fee	L310 Written Discovery	Pearsall, Patrick	345 00	0 20	10 35	10.35	58 65
	<b>Activity:</b> A106 Communicate (with client)								
	<b>Description:</b> Written Discovery Communicate with client J. Frederick re filing and serving of Staff's 1st and 2nd sets of RFIs / PUCT/Discovery								
	<b>Adjustment:</b> 07/09/2020 - Amount adjusted by 10 35 - system, system <b>Reason for Adjustment:</b> Discount Agreement <b>Comments to Requestor:</b> 15% discount to vendor fees per billing discount agreement								
77	06/26/2020	Fee	L210 Pleadings	Pearsall, Patrick	345 00	0 10	5 18	5.18	29 32
	<b>Activity:</b> A104 Review/analyze								
	<b>Description:</b> Pleadings Review/Analyze ARM's motion to intervene / PUCT/Non-Discovery Pleadings and Motions								
	<b>Adjustment:</b> 07/09/2020 - Amount adjusted by 5 18 - system, system <b>Reason for Adjustment:</b> Discount Agreement <b>Comments to Requestor:</b> 15% discount to vendor fees per billing discount agreement								
78	06/26/2020	Fee	L160 Settlement/Non-Binding ADR	Pearsall, Patrick	345 00	0 20	10 35	10.35	58 65
	<b>Activity:</b> A108 Communicate (other external)								
	<b>Description:</b> Settlement/Non-binding ADR Communicate with other external ARM counsel M. Arth re settlement conference / PUCT/Settlement Activities								
	<b>Adjustment:</b> 07/09/2020 - Amount adjusted by 10 35 - system, system <b>Reason for Adjustment:</b> Discount Agreement								

<b>Comments to Requestor:</b> 15% discount to vendor fees per billing discount agreement									
79	06/28/2020	Fee	L160 Settlement/Non-Binding ADR	Pearsall, Patrick	345 00	0 20	10 35	10 35	58 65
<b>Activity:</b> A104 Review/analyze <b>Description:</b> Settlement/Non-binding ADR Review/Analyze issues re settlement conference and potential settlement terms and conditions / PUCT/Settlement Activities <b>Adjustment:</b> 07/09/2020 - Amount adjusted by 10 35 - system, system <b>Reason for Adjustment:</b> Discount Agreement <b>Comments to Requestor:</b> 15% discount to vendor fees per billing discount agreement									
80	06/29/2020	Fee	L310 Written Discovery	Jones, Jackie	145 00	0 10	2 18	2 18	12 32
<b>Activity:</b> A106 Communicate (with client) <b>Description:</b> Written Discovery Communicate with client G Gullickson re confidential responses to Staff's 1st / PUCT/Discovery <b>Adjustment:</b> 07/09/2020 - Amount adjusted by 2 18 - system, system <b>Reason for Adjustment:</b> Discount Agreement <b>Comments to Requestor:</b> 15% discount to vendor fees per billing discount agreement									
81	06/29/2020	Fee	L160 Settlement/Non-Binding ADR	Green, Stephanie	230 00	0 40	13 80	13 80	78 20
<b>Activity:</b> A108 Communicate (other external) <b>Description:</b> Settlement/Non-binding ADR Communicate with other external Staff, Cities, ARM, TIEC re settlement conference / PUCT/Settlement Activities <b>Adjustment:</b> 07/09/2020 - Amount adjusted by 13 80 - system, system <b>Reason for Adjustment:</b> Discount Agreement <b>Comments to Requestor:</b> 15% discount to vendor fees per billing discount agreement									
82	06/29/2020	Fee	L160 Settlement/Non-Binding ADR	Green, Stephanie	230 00	0 60	20 70	20 70	117 30
<b>Activity:</b> A106 Communicate (with client) <b>Description:</b> Settlement/Non-binding ADR Communicate with client M Gage, J Frederick et al re settlement issues identified / PUCT/Settlement Activities <b>Adjustment:</b> 07/09/2020 - Amount adjusted by 20 70 - system, system <b>Reason for Adjustment:</b> Discount Agreement <b>Comments to Requestor:</b> 15% discount to vendor fees per billing discount agreement									
83	06/29/2020	Fee	L160 Settlement/Non-Binding ADR	Pearsall, Patrick	345 00	0 30	15 52	15 52	87 98
<b>Activity:</b> A106 Communicate (with client) <b>Description:</b> Settlement/Non-binding ADR Communicate with client M Gage re settlement and counter-offer strategy / PUCT/Settlement Activities <b>Adjustment:</b> 07/09/2020 - Amount adjusted by 15 52 - system, system <b>Reason for Adjustment:</b> Discount Agreement <b>Comments to Requestor:</b> 15% discount to vendor fees per billing discount agreement									
84	06/29/2020	Fee	L160 Settlement/Non-Binding ADR	Pearsall, Patrick	345 00	0 40	20 70	20 70	117 30
<b>Activity:</b> A109 Appear for/attend <b>Description:</b> Settlement/Non-binding ADR Appear for/attend telephone settlement conference with counsel for Staff, Cities, ARM, and TIEC / PUCT/Settlement Activities <b>Adjustment:</b> 07/09/2020 - Amount adjusted by 20 70 - system, system <b>Reason for Adjustment:</b> Discount Agreement <b>Comments to Requestor:</b> 15% discount to vendor fees per billing discount agreement									
85	06/29/2020	Fee	L160 Settlement/Non-Binding ADR	Pearsall, Patrick	345 00	0 60	31 05	31 05	175 95
<b>Activity:</b> A106 Communicate (with client) <b>Description:</b> Settlement/Non-binding ADR Communicate with client J Frederick, M Gage, R Fahrlander, P Osterloh, J Jackson, and R Cavazos re settlement conference and Cities' proposed settlement adjustment / PUCT/Settlement Activities <b>Adjustment:</b> 07/09/2020 - Amount adjusted by 31 05 - system, system <b>Reason for Adjustment:</b> Discount Agreement <b>Comments to Requestor:</b> 15% discount to vendor fees per billing discount agreement									
86	06/29/2020	Fee	L160 Settlement/Non-Binding ADR	Pearsall, Patrick	345 00	0 30	15 52	15 52	87 98
<b>Activity:</b> A108 Communicate (other external) <b>Description:</b> Settlement/Non-binding ADR Communicate with other external Cities' counsel P Dinnin re settlement offer and potential AEP Texas counter-offer / PUCT/Settlement Activities <b>Adjustment:</b> 07/09/2020 - Amount adjusted by 15 52 - system, system <b>Reason for Adjustment:</b> Discount Agreement <b>Comments to Requestor:</b> 15% discount to vendor fees per billing discount agreement									
87	06/29/2020	Fee	L160 Settlement/Non-Binding ADR	Pearsall, Patrick	345 00	1 60	82 80	82 80	469 20
<b>Activity:</b> A104 Review/analyze <b>Description:</b> Settlement/Non-binding ADR Review/Analyze filing package and 2019 settlement and final order, and prepare for and									

	analyze issues re settlement conference and settlement offer and counter-offer strategy / PUCT/Settlement Activities <b>Adjustment:</b> 07/09/2020 - Amount adjusted by 82 80 - system, system <b>Reason for Adjustment:</b> Discount Agreement <b>Comments to Requestor:</b> 15% discount to vendor fees per billing discount agreement								
88	06/30/2020	Fee	L310 Written Discovery	Jones, Jackie	145 00	0 40	8 70	8 70	49 30
	<b>Activity:</b> A104 Review/analyze <b>Description:</b> Written Discovery Review/Analyze and organize responses to Staff's 1st and 2nd and Cities 1st / PUCT/Discovery <b>Adjustment:</b> 07/09/2020 - Amount adjusted by 8.70 - system, system <b>Reason for Adjustment:</b> Discount Agreement <b>Comments to Requestor:</b> 15% discount to vendor fees per billing discount agreement								
89	06/30/2020	Fee	L310 Written Discovery	Jones, Jackie	145 00	0 10	2 18	2 18	12 32
	<b>Activity:</b> A103 Draft/revise <b>Description:</b> Written Discovery Draft/Revise statement under protective order re Staff's 1st confidential responses / PUCT/Discovery <b>Adjustment:</b> 07/09/2020 - Amount adjusted by 2.18 - system, system <b>Reason for Adjustment:</b> Discount Agreement <b>Comments to Requestor:</b> 15% discount to vendor fees per billing discount agreement								
90	06/30/2020	Fee	L210 Pleadings	Pearsall, Patrick	345 00	0 10	5 18	5 18	29 32
	<b>Activity:</b> A104 Review/analyze <b>Description:</b> Pleadings Review/Analyze issues re protective order statements for confidential discovery responses / PUCT/Non-Discovery Pleadings and Motions. <b>Adjustment:</b> 07/09/2020 - Amount adjusted by 5 18 - system, system <b>Reason for Adjustment:</b> Discount Agreement <b>Comments to Requestor:</b> 15% discount to vendor fees per billing discount agreement								
91	06/30/2020	Fee	L160 Settlement/Non-Binding ADR	Pearsall, Patrick	345 00	0 20	10 35	10 35	58.65
	<b>Activity:</b> A106 Communicate (with client) <b>Description:</b> Settlement/Non-binding ADR Communicate with client litigation team re Cities' counter-offer and response strategy / PUCT/Settlement Activities <b>Adjustment:</b> 07/09/2020 - Amount adjusted by 10 35 - system, system <b>Reason for Adjustment:</b> Discount Agreement <b>Comments to Requestor:</b> 15% discount to vendor fees per billing discount agreement								
92	06/30/2020	Fee	L160 Settlement/Non-Binding ADR	Pearsall, Patrick	345.00	0 30	15 52	15 52	87.98
	<b>Activity:</b> A108 Communicate (other external) <b>Description:</b> Settlement/Non-binding ADR Communicate with other external Cities' counsel P. Dinnin re reply to settlement counter-offer / PUCT/Settlement Activities <b>Adjustment:</b> 07/09/2020 - Amount adjusted by 15 52 - system, system <b>Reason for Adjustment:</b> Discount Agreement <b>Comments to Requestor:</b> 15% discount to vendor fees per billing discount agreement								
93	06/30/2020	Fee	L160 Settlement/Non-Binding ADR	Pearsall, Patrick	345 00	0 20	10 35	10 35	58 65
	<b>Activity:</b> A108 Communicate (other external) <b>Description:</b> Settlement/Non-binding ADR Communicate with other external counsel for Staff and intervenors re settlement terms and abating procedural schedule / PUCT/Settlement Activities <b>Adjustment:</b> 07/09/2020 - Amount adjusted by 10 35 - system, system <b>Reason for Adjustment:</b> Discount Agreement <b>Comments to Requestor:</b> 15% discount to vendor fees per billing discount agreement								

Completed Requests

Item	Request Name	Requestor	Request Date	Completion Date	Comment	Outcome
1	Post Invoice for 7,848 85 USD	Duggins Wren Mann & Romero, LLP	07/09/2020	07/15/2020		Approved
<b>Approval History</b>						
	<b>Stop</b>	<b>Performer</b>	<b>Activity</b>	<b>Date/Time</b>	<b>Internal Comment</b>	
	1	Gage, Melissa	Approved	07/15/2020 01:33 PM		

Header Information

Invoice Number: 34592  
Vendor: Duggins Wren Mann & Romero, LLP  
Address: 600 Congress Ave Suite 1900, Austin, TX, 78701, United States of America  
Tax ID: 27-5110427  
Invoice Date: 08/12/2020  
Received Date: 08/12/2020  
Project: AEP058241-AEP Texas EECRF - Docket No 50892  
Posting Status: Posted

Billing Start Date: 07/01/2020  
Billing End Date: 07/31/2020

Submitted Total: \$6604 00  
Submitted Currency: USD  
Tax Rate: 0 00%  
PS Voucher: 00977335  
Approved Total: \$5481 32

Invoice Summary

Type	Rate x Units	Discount	AEP Disc	Adjustment	AEP Split	Tax	Amount
Fees	6604 00	0 00	1122 68	0 00	0 00	0 00	5481 32
Expenses	0 00	0 00	N/A	0 00	0 00	0 00	0 00
Invoice Total	6604 00	0 00	1122 68	0 00	0 00	0 00	5481 32

Line Items

Item	Date	Type	Category	TK	Rate	Units	Disc	Adj	Amt
1	07/01/2020	Fee	L160 Settlement/Non-Binding ADR	Green, Stephanie	230 00	0 30	11 73	11 73	57 27
	Activity: A108 Communicate (other external)								
	Description: Settlement/Non-binding ADR Communicate with other external parties re settlement progress and approval of filing suspending procedural schedule to facilitate settlement / PUCT/Settlement Activities								
	Adjustment: 08/12/2020 - Amount adjusted by 11 73 - system, system								
	Reason for Adjustment: Discount Agreement								
2	07/01/2020	Fee	L210 Pleadings	Green, Stephanie	230 00	0 30	11 73	11 73	57 27
	Activity: A103 Draft/revise								
	Description: Pleadings Draft/Revise motion to suspend procedural schedule / PUCT/Non-Discovery Pleadings and Motions								
	Adjustment: 08/12/2020 - Amount adjusted by 11 73 - system, system								
	Reason for Adjustment: Discount Agreement								
3	07/01/2020	Fee	L350 Discovery Motions	Green, Stephanie	230 00	0 20	7 82	7 82	38 18
	Activity: A103 Draft/revise								
	Description: Discovery Motions Draft/Revise and file statement under protective order re Staff's 1st RFI / PUCT/Discovery Motions								
	Adjustment: 08/12/2020 - Amount adjusted by 7 82 - system, system								
	Reason for Adjustment: Discount Agreement								
4	07/01/2020	Fee	L350 Discovery Motions	Green, Stephanie	230 00	0 20	7 82	7 82	38 18
	Activity: A104 Review/analyze								
	Description: Discovery Motions Review/Analyze confidential discovery documents related to statement under protective order / PUCT/Discovery Motions								
	Adjustment: 08/12/2020 - Amount adjusted by 7 82 - system, system								
	Reason for Adjustment: Discount Agreement								
5	07/01/2020	Fee	L210 Pleadings	Pearsall, Patrick	345 00	0 20	11 73	11 73	57 27
	Activity: A108 Communicate (other external)								
	Description: Pleadings Communicate with other external Staff counsel J Adkins, TIEC counsel J Zhu, ARM counsel M Arth, and Cities counsel P Dinnin re motion to abate procedural schedule / PUCT/Settlement Activities								
	Adjustment: 08/12/2020 - Amount adjusted by 11 73 - system, system								
	Reason for Adjustment: Discount Agreement								
6	07/01/2020	Fee	L210 Pleadings	Pearsall, Patrick	345 00	0 20	11 73	11 73	57 27
	Activity: A103 Draft/revise								
	Description: Pleadings Draft/Revise motion to suspend procedural schedule / PUCT/Non-Discovery Pleadings and Motions								
	Adjustment: 08/12/2020 - Amount adjusted by 11 73 - system, system								
	Reason for Adjustment: Discount Agreement								

<b>Comments to Requestor:</b> 17% discount to vendor fees per billing discount agreement									
7	07/01/2020	Fee	L210 Pleadings	Pearsall, Patrick	345 00	0 10	5 86	5 86	28 64
<b>Activity:</b> A103 Draft/revise <b>Description:</b> Pleadings Draft/Revise protective order statement re Staff's 1st set of RFIs / PUCT/Discovery <b>Adjustment:</b> 08/12/2020 - Amount adjusted by 5 86 - system, system <b>Reason for Adjustment:</b> Discount Agreement <b>Comments to Requestor:</b> 17% discount to vendor fees per billing discount agreement									
8	07/06/2020	Fee	L210 Pleadings	Jones, Jackie	145 00	0 10	2 46	2 46	12 04
<b>Activity:</b> A104 Review/analyze <b>Description:</b> Pleadings Review/Analyze SOAH Order No. 3 and update procedural calendar re same / PUCT/Overall Case Administration <b>Adjustment:</b> 08/12/2020 - Amount adjusted by 2 46 - system, system <b>Reason for Adjustment:</b> Discount Agreement <b>Comments to Requestor:</b> 17% discount to vendor fees per billing discount agreement									
9	07/06/2020	Fee	L160 Settlement/Non-Binding ADR	Green, Stephanie	230 00	0 10	3 91	3 91	19 09
<b>Activity:</b> A104 Review/analyze <b>Description:</b> Settlement/Non-binding ADR Review/Analyze issues re preparation of settlement documents / PUCT/Settlement Activities <b>Adjustment:</b> 08/12/2020 - Amount adjusted by 3 91 - system, system <b>Reason for Adjustment:</b> Discount Agreement <b>Comments to Requestor:</b> 17% discount to vendor fees per billing discount agreement									
10	07/06/2020	Fee	L160 Settlement/Non-Binding ADR	Pearsall, Patrick	345 00	0 50	29 32	29 32	143 18
<b>Activity:</b> A104 Review/analyze <b>Description:</b> Settlement/Non-binding ADR Review/Analyze issues re scope and structure of necessary settlement documents and strategy for finalizing settlement / PUCT/Settlement Activities <b>Adjustment:</b> 08/12/2020 - Amount adjusted by 29 32 - system, system <b>Reason for Adjustment:</b> Discount Agreement <b>Comments to Requestor:</b> 17% discount to vendor fees per billing discount agreement									
11	07/07/2020	Fee	L250 Other Written Motions/Submissions	Green, Stephanie	230 00	1 10	43 01	43 01	209 99
<b>Activity:</b> A103 Draft/revise <b>Description:</b> Other Written Motions and Submissions Draft/Revise motion to admit evidence and stipulation / PUCT/Settlement Activities <b>Adjustment:</b> 08/12/2020 - Amount adjusted by 43 01 - system, system <b>Reason for Adjustment:</b> Discount Agreement <b>Comments to Requestor:</b> 17% discount to vendor fees per billing discount agreement									
12	07/08/2020	Fee	L160 Settlement/Non-Binding ADR	Green, Stephanie	230 00	4 70	183 77	183 77	897 23
<b>Activity:</b> A103 Draft/revise <b>Description:</b> Settlement/Non-binding ADR Draft/Revise proposed order / PUCT/Settlement Activities <b>Adjustment:</b> 08/12/2020 - Amount adjusted by 183 77 - system, system <b>Reason for Adjustment:</b> Discount Agreement <b>Comments to Requestor:</b> 17% discount to vendor fees per billing discount agreement									
13	07/09/2020	Fee	L160 Settlement/Non-Binding ADR	Green, Stephanie	230 00	0 30	11 73	11 73	57 27
<b>Activity:</b> A103 Draft/revise <b>Description:</b> Settlement/Non-binding ADR Draft/Revise settlement materials per litigation team input / PUCT/Settlement Activities <b>Adjustment:</b> 08/12/2020 - Amount adjusted by 11 73 - system, system <b>Reason for Adjustment:</b> Discount Agreement <b>Comments to Requestor:</b> 17% discount to vendor fees per billing discount agreement									
14	07/09/2020	Fee	L160 Settlement/Non-Binding ADR	Pearsall, Patrick	345 00	2 30	134 90	134 90	658 60
<b>Activity:</b> A103 Draft/revise <b>Description:</b> Settlement/Non-binding ADR Draft/Revise stipulation, proposed order, and motion to admit evidence in support of settlement / PUCT/Settlement Activities <b>Adjustment:</b> 08/12/2020 - Amount adjusted by 134 90 - system, system <b>Reason for Adjustment:</b> Discount Agreement <b>Comments to Requestor:</b> 17% discount to vendor fees per billing discount agreement									
15	07/09/2020	Fee	L160 Settlement/Non-Binding ADR	Pearsall, Patrick	345 00	0 20	11 73	11 73	57 27
<b>Activity:</b> A108 Communicate (other external) <b>Description:</b> Settlement/Non-binding ADR Communicate with other external Staff counsel J. Adkins and Cities' counsel P. Dinnin re preparation of settlement materials / PUCT/Settlement Activities									



	<b>Adjustment:</b> 08/12/2020 - Amount adjusted by 11 73 - system, system <b>Reason for Adjustment:</b> Discount Agreement <b>Comments to Requestor:</b> 17% discount to vendor fees per billing discount agreement								
16	07/10/2020	Fee	L160 Settlement/Non-Binding ADR	Pearsall, Patrick	345 00	0 20	11 73	11 73	57 27
	<b>Activity:</b> A106 Communicate (with client) <b>Description:</b> Settlement/Non-binding ADR Communicate with client J Jackson re updated tariff reflecting settlement agreement / PUCT/Settlement Activities <b>Adjustment:</b> 08/12/2020 - Amount adjusted by 11 73 - system, system <b>Reason for Adjustment:</b> Discount Agreement <b>Comments to Requestor:</b> 17% discount to vendor fees per billing discount agreement								
17	07/10/2020	Fee	L410 Fact Witnesses	Pearsall, Patrick	345 00	0 30	17 60	17 60	85 90
	<b>Activity:</b> A104 Review/analyze <b>Description:</b> Fact Witnesses Review/Analyze Cities' witness K Nalepa's testimony addressing rate-case expenses associated with 2019 EECRF proceeding / PUCT/Settlement Activities <b>Adjustment:</b> 08/12/2020 - Amount adjusted by 17 60 - system, system <b>Reason for Adjustment:</b> Discount Agreement <b>Comments to Requestor:</b> 17% discount to vendor fees per billing discount agreement								
18	07/10/2020	Fee	L160 Settlement/Non-Binding ADR	Pearsall, Patrick	345 00	0 70	41 06	41 06	200 44
	<b>Activity:</b> A104 Review/analyze <b>Description:</b> Settlement/Non-binding ADR Review/Analyze issues and edit stipulation and proposed order / PUCT/Settlement Activities <b>Adjustment:</b> 08/12/2020 - Amount adjusted by 41 06 - system, system <b>Reason for Adjustment:</b> Discount Agreement <b>Comments to Requestor:</b> 17% discount to vendor fees per billing discount agreement								
19	07/13/2020	Fee	L160 Settlement/Non-Binding ADR	Pearsall, Patrick	345 00	1 30	76 24	76 24	372 26
	<b>Activity:</b> A103 Draft/revise <b>Description:</b> Settlement/Non-binding ADR Draft/Revise settlement agreement, proposed order, and motion to admit evidence / PUCT/Settlement Activities <b>Adjustment:</b> 08/12/2020 - Amount adjusted by 76 24 - system, system <b>Reason for Adjustment:</b> Discount Agreement <b>Comments to Requestor:</b> 17% discount to vendor fees per billing discount agreement								
20	07/14/2020	Fee	L160 Settlement/Non-Binding ADR	Green, Stephanie	230 00	0 60	23 46	23 46	114 54
	<b>Activity:</b> A103 Draft/revise <b>Description:</b> Settlement/Non-binding ADR Draft/Revise settlement documents, incorporate proposed revisions, and prepare for client review / PUCT/Settlement Activities <b>Adjustment:</b> 08/12/2020 - Amount adjusted by 23 46 - system, system <b>Reason for Adjustment:</b> Discount Agreement <b>Comments to Requestor:</b> 17% discount to vendor fees per billing discount agreement								
21	07/14/2020	Fee	L160 Settlement/Non-Binding ADR	Green, Stephanie	230 00	0 10	3 91	3 91	19 09
	<b>Activity:</b> A106 Communicate (with client) <b>Description:</b> Settlement/Non-binding ADR Communicate with client J Frederick, M Gage, G Hughes et al to circulate client documents for review and feedback / PUCT/Settlement Activities <b>Adjustment:</b> 08/12/2020 - Amount adjusted by 3 91 - system, system <b>Reason for Adjustment:</b> Discount Agreement <b>Comments to Requestor:</b> 17% discount to vendor fees per billing discount agreement								
22	07/15/2020	Fee	L160 Settlement/Non-Binding ADR	Pearsall, Patrick	345 00	0 40	23 46	23 46	114 54
	<b>Activity:</b> A104 Review/analyze <b>Description:</b> Settlement/Non-binding ADR Review/Analyze litigation team's comments on and revisions to proposed order and stipulation / PUCT/Settlement Activities <b>Adjustment:</b> 08/12/2020 - Amount adjusted by 23 46 - system, system <b>Reason for Adjustment:</b> Discount Agreement <b>Comments to Requestor:</b> 17% discount to vendor fees per billing discount agreement								
23	07/16/2020	Fee	L160 Settlement/Non-Binding ADR	Green, Stephanie	230 00	0 60	23 46	23 46	114 54
	<b>Activity:</b> A104 Review/analyze <b>Description:</b> Settlement/Non-binding ADR Review/Analyze correspondence from M Gage, R Fahrlender, J Jackson re feedback on drafts of stipulation, proposed order, and motion to remand / PUCT/Settlement Activities <b>Adjustment:</b> 08/12/2020 - Amount adjusted by 23 46 - system, system <b>Reason for Adjustment:</b> Discount Agreement <b>Comments to Requestor:</b> 17% discount to vendor fees per billing discount agreement								
24	07/16/2020	Fee	L160 Settlement/Non-Binding ADR	Green, Stephanie	230 00	0 10	3 91	3 91	19 09

			Binding ADR	Stephanie					
	<b>Activity:</b> A106 Communicate (with client) <b>Description:</b> Settlement/Non-binding ADR Communicate with client P Osterloh re review of proposed order / PUCT/Settlement Activities  <b>Adjustment:</b> 08/12/2020 - Amount adjusted by 3 91 - system, system <b>Reason for Adjustment:</b> Discount Agreement <b>Comments to Requestor:</b> 17% discount to vendor fees per billing discount agreement								
25	07/16/2020	Fee	L160 Settlement/Non-Binding ADR	Pearsall, Patrick	345 00	0 30	17 60	17 60	85 90
	<b>Activity:</b> A104 Review/analyze <b>Description:</b> Settlement/Non-binding ADR Review/Analyze edits to stipulation and proposed order / PUCT/Settlement Activities  <b>Adjustment:</b> 08/12/2020 - Amount adjusted by 17 60 - system, system <b>Reason for Adjustment:</b> Discount Agreement <b>Comments to Requestor:</b> 17% discount to vendor fees per billing discount agreement								
26	07/17/2020	Fee	L160 Settlement/Non-Binding ADR	Green, Stephanie	230 00	0 50	19 55	19 55	95 45
	<b>Activity:</b> A103 Draft/revise <b>Description:</b> Settlement/Non-binding ADR Draft/Revise and incorporate compiled edits and feedback into proposed order, stipulation for parties review / PUCT/Settlement Activities  <b>Adjustment:</b> 08/12/2020 - Amount adjusted by 19 55 - system, system <b>Reason for Adjustment:</b> Discount Agreement <b>Comments to Requestor:</b> 17% discount to vendor fees per billing discount agreement								
27	07/17/2020	Fee	L160 Settlement/Non-Binding ADR	Green, Stephanie	230 00	0 10	3 91	3 91	19 09
	<b>Activity:</b> A106 Communicate (with client) <b>Description:</b> Settlement/Non-binding ADR Communicate with client P Osterloh re comments on proposed order and revisions to reflect same / PUCT/Settlement Activities  <b>Adjustment:</b> 08/12/2020 - Amount adjusted by 3 91 - system, system <b>Reason for Adjustment:</b> Discount Agreement <b>Comments to Requestor:</b> 17% discount to vendor fees per billing discount agreement								
28	07/17/2020	Fee	L160 Settlement/Non-Binding ADR	Green, Stephanie	230 00	0 10	3 91	3 91	19 09
	<b>Activity:</b> A106 Communicate (with client) <b>Description:</b> Settlement/Non-binding ADR Communicate with client J Frederick to confirm finding information re notice in proposed order / PUCT/Settlement Activities  <b>Adjustment:</b> 08/12/2020 - Amount adjusted by 3 91 - system, system <b>Reason for Adjustment:</b> Discount Agreement <b>Comments to Requestor:</b> 17% discount to vendor fees per billing discount agreement								
29	07/17/2020	Fee	L160 Settlement/Non-Binding ADR	Pearsall, Patrick	345 00	1 10	64 52	64 52	314 98
	<b>Activity:</b> A104 Review/analyze <b>Description:</b> Settlement/Non-binding ADR Review/Analyze and circulate settlement documents to Staff and intervenor counsel / PUCT/Settlement Activities  <b>Adjustment:</b> 08/12/2020 - Amount adjusted by 64 52 - system, system <b>Reason for Adjustment:</b> Discount Agreement <b>Comments to Requestor:</b> 17% discount to vendor fees per billing discount agreement								
30	07/21/2020	Fee	L160 Settlement/Non-Binding ADR	Pearsall, Patrick	345 00	0 20	11 73	11 73	57 27
	<b>Activity:</b> A108 Communicate (other external) <b>Description:</b> Settlement/Non-binding ADR Communicate with other external J Mauldin and P Dinnin re proposed order / PUCT/Settlement Activities  <b>Adjustment:</b> 08/12/2020 - Amount adjusted by 11 73 - system, system <b>Reason for Adjustment:</b> Discount Agreement <b>Comments to Requestor:</b> 17% discount to vendor fees per billing discount agreement								
31	07/22/2020	Fee	L160 Settlement/Non-Binding ADR	Green, Stephanie	230 00	0 20	7 82	7 82	38 18
	<b>Activity:</b> A104 Review/analyze <b>Description:</b> Settlement/Non-binding ADR Review/Analyze correspondence and edits to settlement documents from Cities and ARM / PUCT/Settlement Activities  <b>Adjustment:</b> 08/12/2020 - Amount adjusted by 7 82 - system, system <b>Reason for Adjustment:</b> Discount Agreement <b>Comments to Requestor:</b> 17% discount to vendor fees per billing discount agreement								
32	07/22/2020	Fee	L160 Settlement/Non-Binding ADR	Pearsall, Patrick	345 00	0 30	17 60	17 60	85 90
	<b>Activity:</b> A104 Review/analyze <b>Description:</b> Settlement/Non-binding ADR Review/Analyze intervenor edits to stipulation and proposed order / PUCT/Settlement Activities								

	<b>Adjustment:</b> 08/12/2020 - Amount adjusted by 17 60 - system, system <b>Reason for Adjustment:</b> Discount Agreement <b>Comments to Requestor:</b> 17% discount to vendor fees per billing discount agreement								
33	07/23/2020	Fee	L160 Settlement/Non-Binding ADR	Pearsall, Patrick	345 00	0 10	5 86	5 86	28 64
	<b>Activity:</b> A108 Communicate (other external) <b>Description:</b> Settlement/Non-binding ADR Communicate with other external Staff counsel E D'Ambrosio re settlement documents / PUCT/Settlement Activities <b>Adjustment:</b> 08/12/2020 - Amount adjusted by 5 86 - system, system <b>Reason for Adjustment:</b> Discount Agreement <b>Comments to Requestor:</b> 17% discount to vendor fees per billing discount agreement								
34	07/24/2020	Fee	L160 Settlement/Non-Binding ADR	Green, Stephanie	230 00	0 30	11 73	11 73	57 27
	<b>Activity:</b> A104 Review/analyze <b>Description:</b> Settlement/Non-binding ADR Review/Analyze edits and verify revisions to settlement documents from Staff / PUCT/Settlement Activities <b>Adjustment:</b> 08/12/2020 - Amount adjusted by 11 73 - system, system <b>Reason for Adjustment:</b> Discount Agreement <b>Comments to Requestor:</b> 17% discount to vendor fees per billing discount agreement								
35	07/24/2020	Fee	L160 Settlement/Non-Binding ADR	Green, Stephanie	230 00	0 20	7 82	7 82	38 18
	<b>Activity:</b> A106 Communicate (with client) <b>Description:</b> Settlement/Non-binding ADR Communicate with client M Gage, J Frederick et al re parties' revisions to settlement documents for review and approval / PUCT/Settlement Activities <b>Adjustment:</b> 08/12/2020 - Amount adjusted by 7 82 - system, system <b>Reason for Adjustment:</b> Discount Agreement <b>Comments to Requestor:</b> 17% discount to vendor fees per billing discount agreement								
36	07/24/2020	Fee	L160 Settlement/Non-Binding ADR	Green, Stephanie	230 00	0 10	3 91	3 91	19 09
	<b>Activity:</b> A104 Review/analyze <b>Description:</b> Settlement/Non-binding ADR Review/Analyze M Gage re concerning ARM and Cities' proposals re settlement / PUCT/Settlement Activities <b>Adjustment:</b> 08/12/2020 - Amount adjusted by 3 91 - system, system <b>Reason for Adjustment:</b> Discount Agreement <b>Comments to Requestor:</b> 17% discount to vendor fees per billing discount agreement								
37	07/24/2020	Fee	L160 Settlement/Non-Binding ADR	Pearsall, Patrick	345 00	0 50	29 32	29 32	143 18
	<b>Activity:</b> A104 Review/analyze <b>Description:</b> Settlement/Non-binding ADR Review/Analyze Staff and Intervenors' proposed revisions to stipulation and proposed order / PUCT/Settlement Activities <b>Adjustment:</b> 08/12/2020 - Amount adjusted by 29 32 - system, system <b>Reason for Adjustment:</b> Discount Agreement <b>Comments to Requestor:</b> 17% discount to vendor fees per billing discount agreement								
38	07/24/2020	Fee	L160 Settlement/Non-Binding ADR	Pearsall, Patrick	345 00	0 40	23 46	23 46	114 54
	<b>Activity:</b> A106 Communicate (with client) <b>Description:</b> Settlement/Non-binding ADR Communicate with client M Gage re Staff and Intervenors' revisions to stipulation and proposed order and strategy for response to same / PUCT/Settlement Activities <b>Adjustment:</b> 08/12/2020 - Amount adjusted by 23 46 - system, system <b>Reason for Adjustment:</b> Discount Agreement <b>Comments to Requestor:</b> 17% discount to vendor fees per billing discount agreement								
39	07/27/2020	Fee	L160 Settlement/Non-Binding ADR	Green, Stephanie	230 00	0 10	3 91	3 91	19 09
	<b>Activity:</b> A104 Review/analyze <b>Description:</b> Settlement/Non-binding ADR Review/Analyze correspondence from TIEC re edits to proposed order attachment / PUCT/Settlement Activities <b>Adjustment:</b> 08/12/2020 - Amount adjusted by 3 91 - system, system <b>Reason for Adjustment:</b> Discount Agreement <b>Comments to Requestor:</b> 17% discount to vendor fees per billing discount agreement								
40	07/27/2020	Fee	L160 Settlement/Non-Binding ADR	Green, Stephanie	230 00	0 10	3 91	3 91	19 09
	<b>Activity:</b> A104 Review/analyze <b>Description:</b> Settlement/Non-binding ADR Review/Analyze correspondence from client C Rinehart and R Fahrlander responding to settlement document revisions / PUCT/Settlement Activities <b>Adjustment:</b> 08/12/2020 - Amount adjusted by 3 91 - system, system <b>Reason for Adjustment:</b> Discount Agreement <b>Comments to Requestor:</b> 17% discount to vendor fees per billing discount agreement								
41	07/27/2020	Fee	L160 Settlement/Non-Binding ADR	Green,	230 00	0 60	23 46	23 46	114 54

			Binding ADR	Stephanie					
	<b>Activity:</b> A103 Draft/revise <b>Description:</b> Settlement/Non-binding ADR Draft/Revise settlement stipulation and proposed order and verify conformance of changes in documents / PUCT/Settlement Activities  <b>Adjustment:</b> 08/12/2020 - Amount adjusted by 23 46 - system, system <b>Reason for Adjustment:</b> Discount Agreement <b>Comments to Requestor:</b> 17% discount to vendor fees per billing discount agreement								
	07/27/2020	Fee	L160 Settlement/Non-Binding ADR	Green, Stephanie	230 00	0 10	3 91	3 91	19 09
42	<b>Activity:</b> A106 Communicate (with client) <b>Description:</b> Settlement/Non-binding ADR Communicate with client M Gage re settlement document revisions and response / PUCT/Settlement Activities  <b>Adjustment:</b> 08/12/2020 - Amount adjusted by 3 91 - system, system <b>Reason for Adjustment:</b> Discount Agreement <b>Comments to Requestor:</b> 17% discount to vendor fees per billing discount agreement								
	07/27/2020	Fee	L160 Settlement/Non-Binding ADR	Pearsall, Patrick	345 00	0 50	29 32	29 32	143 18
43	<b>Activity:</b> A104 Review/analyze <b>Description:</b> Settlement/Non-binding ADR Review/Analyze issues re Staff and Intervenor's revisions to stipulation and proposed order / PUCT/Settlement Activities  <b>Adjustment:</b> 08/12/2020 - Amount adjusted by 29 32 - system, system <b>Reason for Adjustment:</b> Discount Agreement <b>Comments to Requestor:</b> 17% discount to vendor fees per billing discount agreement								
	07/27/2020	Fee	L160 Settlement/Non-Binding ADR	Pearsall, Patrick	345 00	0 30	17 60	17 60	85 90
44	<b>Activity:</b> A106 Communicate (with client) <b>Description:</b> Settlement/Non-binding ADR Communicate with client M Gage and litigation team re response to Staff and Intervenor's proposed revisions to stipulation and proposed order / PUCT/Settlement Activities  <b>Adjustment:</b> 08/12/2020 - Amount adjusted by 17 60 - system, system <b>Reason for Adjustment:</b> Discount Agreement <b>Comments to Requestor:</b> 17% discount to vendor fees per billing discount agreement								
	07/28/2020	Fee	L160 Settlement/Non-Binding ADR	Pearsall, Patrick	345 00	0 20	11 73	11 73	57 27
45	<b>Activity:</b> A108 Communicate (other external) <b>Description:</b> Settlement/Non-binding ADR Communicate with other external Staff and intervenors re revisions to stipulation and proposed order / PUCT/Settlement Activities  <b>Adjustment:</b> 08/12/2020 - Amount adjusted by 11 73 - system, system <b>Reason for Adjustment:</b> Discount Agreement <b>Comments to Requestor:</b> 17% discount to vendor fees per billing discount agreement								
	07/30/2020	Fee	L160 Settlement/Non-Binding ADR	Green, Stephanie	230 00	0 40	15 64	15 64	76 36
46	<b>Activity:</b> A103 Draft/revise <b>Description:</b> Settlement/Non-binding ADR Draft/Revise and finalize settlement documents for filing following Staff filing of testimony in support and verify exhibits to same / PUCT/Settlement Activities  <b>Adjustment:</b> 08/12/2020 - Amount adjusted by 15 64 - system, system <b>Reason for Adjustment:</b> Discount Agreement <b>Comments to Requestor:</b> 17% discount to vendor fees per billing discount agreement								
	07/30/2020	Fee	L160 Settlement/Non-Binding ADR	Green, Stephanie	230 00	0 10	3 91	3 91	19 09
47	<b>Activity:</b> A104 Review/analyze <b>Description:</b> Settlement/Non-binding ADR Review/Analyze and confirm Cities, ARM and Staff approval for signature and filing settlement documents / PUCT/Settlement Activities  <b>Adjustment:</b> 08/12/2020 - Amount adjusted by 3 91 - system, system <b>Reason for Adjustment:</b> Discount Agreement <b>Comments to Requestor:</b> 17% discount to vendor fees per billing discount agreement								
	07/30/2020	Fee	L160 Settlement/Non-Binding ADR	Green, Stephanie	230 00	0 20	7 82	7 82	38 18
48	<b>Activity:</b> A103 Draft/revise <b>Description:</b> Settlement/Non-binding ADR Draft/Revise agreed joint status report for possible filing / PUCT/Settlement Activities  <b>Adjustment:</b> 08/12/2020 - Amount adjusted by 7 82 - system, system <b>Reason for Adjustment:</b> Discount Agreement <b>Comments to Requestor:</b> 17% discount to vendor fees per billing discount agreement								
	07/30/2020	Fee	L160 Settlement/Non-Binding ADR	Pearsall, Patrick	345 00	0 20	11 73	11 73	57 27
49	<b>Activity:</b> A108 Communicate (other external) <b>Description:</b> Settlement/Non-binding ADR Communicate with other external Staff counsel J Adkins re status of Staff testimony in support of settlement / PUCT/Settlement Activities								

<b>Adjustment:</b> 08/12/2020 - Amount adjusted by 11 73 - system, system <b>Reason for Adjustment:</b> Discount Agreement <b>Comments to Requestor:</b> 17% discount to vendor fees per billing discount agreement								
50	07/30/2020	Fee	L160 Settlement/Non-Binding ADR	Pearsall, Patrick	345 00	0 20	11 73	57 27
	<b>Activity:</b> A104 Review/analyze <b>Description:</b> Settlement/Non-binding ADR Review/Analyze issues re potential filing of status report / PUCT/Settlement Activities. <b>Adjustment:</b> 08/12/2020 - Amount adjusted by 11 73 - system, system <b>Reason for Adjustment:</b> Discount Agreement <b>Comments to Requestor:</b> 17% discount to vendor fees per billing discount agreement							
	07/31/2020	Fee	L160 Settlement/Non-Binding ADR	Green, Stephanie	230 00	0.20	7 82	38 18
51	<b>Activity:</b> A104 Review/analyze <b>Description:</b> Settlement/Non-binding ADR Review/Analyze Staff Testimony of R Tuvilla in support of settlement / PUCT/Settlement Activities <b>Adjustment:</b> 08/12/2020 - Amount adjusted by 7 82 - system, system <b>Reason for Adjustment:</b> Discount Agreement <b>Comments to Requestor:</b> 17% discount to vendor fees per billing discount agreement							
	07/31/2020	Fee	L160 Settlement/Non-Binding ADR	Green, Stephanie	230 00	0 10	3.91	19 09
	<b>Activity:</b> A106 Communicate (with client) <b>Description:</b> Settlement/Non-binding ADR Communicate with client M Gage, J. Frederick, et al re filing of settlement documents and draft testimony from Staff of R. Tuvilla / PUCT/Settlement Activities <b>Adjustment:</b> 08/12/2020 - Amount adjusted by 3 91 - system, system <b>Reason for Adjustment:</b> Discount Agreement <b>Comments to Requestor:</b> 17% discount to vendor fees per billing discount agreement							
53	07/31/2020	Fee	L160 Settlement/Non-Binding ADR	Pearsall, Patrick	345.00	0 20	11 73	57.27
	<b>Activity:</b> A108 Communicate (other external) <b>Description:</b> Settlement/Non-binding ADR Communicate with other external Staff counsel J Adkins re Staff settlement testimony and timing of filing stipulation / PUCT/Settlement Activities <b>Adjustment:</b> 08/12/2020 - Amount adjusted by 11 73 - system, system <b>Reason for Adjustment:</b> Discount Agreement <b>Comments to Requestor:</b> 17% discount to vendor fees per billing discount agreement							
	07/31/2020	Fee	L160 Settlement/Non-Binding ADR	Pearsall, Patrick	345 00	0 20	11.73	57 27
54	<b>Activity:</b> A104 Review/analyze <b>Description:</b> Settlement/Non-binding ADR Review/Analyze Staff witness R Tuvilla testimony in support of settlement / PUCT/Settlement Activities <b>Adjustment:</b> 08/12/2020 - Amount adjusted by 11 73 - system, system <b>Reason for Adjustment:</b> Discount Agreement <b>Comments to Requestor:</b> 17% discount to vendor fees per billing discount agreement							

Completed Requests

Item	Request Name	Requestor	Request Date	Completion Date	Comment	Outcome
1	Post Invoice for 5,481.32 USD	Duggins Wren Mann & Romero, LLP	08/12/2020	08/13/2020		Approved
	<b>Approval History</b>					
	<b>Stop</b>	<b>Performer</b>	<b>Activity</b>	<b>Date/Time</b>	<b>Internal Comment</b>	
	1	Gage, Melissa	Approved	08/12/2020 09 02 PM		

Header Information

Invoice Number: 34772  
Vendor: Duggins Wren Mann & Romero, LLP  
Address: 600 Congress Ave Suite 1900, Austin, TX, 78701, United States of America  
Tax ID: 27-5110427  
Invoice Date: 09/14/2020  
Received Date: 09/14/2020  
Project: AEP058241-AEP Texas EECRF - Docket No 50892  
Posting Status: Posted

Billing Start Date: 08/02/2020  
Billing End Date: 08/31/2020

Submitted Total: \$552 00  
Submitted Currency: USD  
Tax Rate: 0 00%  
PS Voucher: 00978749  
Approved Total: \$458 16

Invoice Summary

Type	Rate x Units	Discount	AEP Disc	Adjustment	AEP Split	Tax	Amount
Fees	552 00	0 00	93 84	0 00	0 00	0 00	458 16
Expenses	0 00	0 00	N/A	0 00	0 00	0 00	0 00
Invoice Total	552 00	0 00	93 84	0 00	0 00	0 00	458 16

Line Items

Item	Date	Type	Category	TK	Rate	Units	Disc	Adj	Amt
1	08/02/2020	Fee	L160 Settlement/Non-Binding ADR	Pearsall, Patrick	345 00	0 20	11 73	11 73	57 27
	Activity: A104 Review/analyze								
	Description: Settlement/Non-binding ADR Review/Analyze issues re finalizing and filing stipulation / PUCT/Settlement Activities								
	Adjustment: 09/14/2020 - Amount adjusted by 11 73 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 17% discount to vendor fees per billing discount agreement								
2	08/03/2020	Fee	L160 Settlement/Non-Binding ADR	Pearsall, Patrick	345 00	0 30	17 60	17 60	85 90
	Activity: A104 Review/analyze								
	Description: Settlement/Non-binding ADR Review/Analyze and finalize stipulation and related settlement documents for filing / PUCT/Settlement Activities								
	Adjustment: 09/14/2020 - Amount adjusted by 17 60 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 17% discount to vendor fees per billing discount agreement								
3	08/03/2020	Fee	L160 Settlement/Non-Binding ADR	Pearsall, Patrick	345 00	0 10	5 86	5 86	28 64
	Activity: A108 Communicate (other external)								
	Description: Settlement/Non-binding ADR Communicate with other external Staff counsel J Adkins re filing of Staff settlement testimony / PUCT/Settlement Activities								
	Adjustment: 09/14/2020 - Amount adjusted by 5 86 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 17% discount to vendor fees per billing discount agreement								
4	08/03/2020	Fee	L160 Settlement/Non-Binding ADR	Green, Stephanie	230 00	0 90	35 19	35 19	171 81
	Activity: A104 Review/analyze								
	Description: Settlement/Non-binding ADR Review/Analyze and finalize settlement documents for filing / PUCT/Settlement Activities								
	Adjustment: 09/14/2020 - Amount adjusted by 35 19 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 17% discount to vendor fees per billing discount agreement								
5	08/03/2020	Fee	L160 Settlement/Non-Binding ADR	Green, Stephanie	230 00	0 20	7 82	7 82	38 18
	Activity: A104 Review/analyze								
	Description: Settlement/Non-binding ADR Review/Analyze and confirm settlement document filing package submitted to Commission / PUCT/Settlement Activities								
	Adjustment: 09/14/2020 - Amount adjusted by 7 82 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 17% discount to vendor fees per billing discount agreement								
6	08/03/2020	Fee	L160 Settlement/Non-Binding ADR	Green, Stephanie	230 00	0 10	3 91	3 91	19 09
	Activity: A108 Communicate (other external)								
	Description: Settlement/Non-binding ADR Communicate with other external J Jackson re providing native form settlement rate calculations / PUCT/Settlement Activities Adjustment: 09/14/2020 - Amount adjusted by 3 91 - system, system								

<b>Reason for Adjustment:</b> Discount Agreement <b>Comments to Requestor:</b> 17% discount to vendor fees per billing discount agreement									
7	08/06/2020	Fee	L250 Other Written Motions/Submissions	Green, Stephanie	230.00	0.10	3.91	3.91	19.09
	<b>Activity:</b> A104 Review/analyze <b>Description:</b> Other Written Motions and Submissions Review/Analyze SOAH Order admitting evidence and remanding docket.								
	<b>Adjustment:</b> 09/14/2020 - Amount adjusted by 3.91 - system, system <b>Reason for Adjustment:</b> Discount Agreement <b>Comments to Requestor:</b> 17% discount to vendor fees per billing discount agreement								
	08/18/2020	Fee	L250 Other Written Motions/Submissions	Green, Stephanie	230.00	0.10	3.91	3.91	19.09
8	<b>Activity:</b> A104 Review/analyze <b>Description:</b> Other Written Motions and Submissions Review/Analyze SOAH remand order / PUCT/Overall Case Administration								
	<b>Adjustment:</b> 09/14/2020 - Amount adjusted by 3.91 - system, system <b>Reason for Adjustment:</b> Discount Agreement <b>Comments to Requestor:</b> 17% discount to vendor fees per billing discount agreement								
	08/18/2020	Fee	L250 Other Written Motions/Submissions	Green, Stephanie	230.00	0.10	3.91	3.91	19.09
	<b>Activity:</b> A104 Review/analyze <b>Description:</b> Other Written Motions and Submissions Review/Analyze submission of proposed order to commission as required by SOAH remand order / PUCT/Overall Case Administration.								
9	<b>Adjustment:</b> 09/14/2020 - Amount adjusted by 3.91 - system, system <b>Reason for Adjustment:</b> Discount Agreement <b>Comments to Requestor:</b> 17% discount to vendor fees per billing discount agreement								

**Completed Requests**

Item	Request Name	Requestor	Request Date	Completion Date	Comment	Outcome
1	Post Invoice for 458.16 USD	Duggins Wren Mann & Romero, LLP	09/14/2020	09/16/2020		Approved
	<b>Approval History</b>					
	<b>Stop</b>	<b>Performer</b>	<b>Activity</b>	<b>Date/Time</b>	<b>Internal Comment</b>	
	1	Gage, Melissa	Approved	09/16/2020 04:04 PM		

Header Information

Invoice Number: 34901  
Vendor: Duggins Wren Mann & Romero, LLP  
Address: 600 Congress Ave Suite 1900, Austin, TX, 78701, United States of America  
Tax ID: 27-5110427  
Invoice Date: 10/13/2020  
Received Date: 10/13/2020  
Project: AEP058241-AEP Texas EECRF - Docket No 50892  
Posting Status: Posted

Billing Start Date: 09/08/2020  
Billing End Date: 09/30/2020

Submitted Total: \$4209 50  
Submitted Currency: USD  
Tax Rate: 0 00%  
PS Voucher: 00980176  
Approved Total: \$3493 89

Invoice Summary

Type	Rate x Units	Discount	AEP Disc	Adjustment	AEP Split	Tax	Amount
Fees	4209 50	0 00	715 61	0 00	0 00	0 00	3493 89
Expenses	0 00	0 00	N/A	0 00	0 00	0 00	0 00
Invoice Total	4209 50	0 00	715 61	0 00	0 00	0 00	3493 89

Line Items

Item	Date	Type	Category	TK	Rate	Units	Disc	Adj	Amt
1	09/08/2020	Fee	L140 Document/File Management	Jones, Jackie	145 00	0 20	4 93	4 93	24 07
	Activity: A104 Review/analyze								
	Description: Document/File Management Review/Analyze proposed order and memorandum / PUCT/File and Document Management								
	Adjustment: 10/13/2020 - Amount adjusted by 4 93 - system, system								
	Reason for Adjustment: Discount Agreement								
Comments to Requestor: 17% discount to vendor fees per billing discount agreement									
2	09/08/2020	Fee	L210 Pleadings	Pearsall, Patrick	345 00	0 20	11 73	11 73	57 27
	Activity: A104 Review/analyze								
	Description: Pleadings Review/Analyze proposed order and associated memo / PUCT/Non-Discovery Pleadings and Motions								
	Adjustment: 10/13/2020 - Amount adjusted by 11 73 - system, system								
	Reason for Adjustment: Discount Agreement								
Comments to Requestor: 17% discount to vendor fees per billing discount agreement									
3	09/08/2020	Fee	L430 Written Motions/Submissions	Green, Stephanie	230 00	0 10	3 91	3 91	19 09
	Activity: A106 Communicate (with client)								
	Description: Written Motions and Submissions Communicate with client J Frederick re draft proposed order / PUCT/Overall Case Strategy								
	Adjustment: 10/13/2020 - Amount adjusted by 3 91 - system, system								
	Reason for Adjustment: Discount Agreement								
Comments to Requestor: 17% discount to vendor fees per billing discount agreement									
4	09/09/2020	Fee	L120 Analysis/Strategy	Pearsall, Patrick	345 00	0 40	23 46	23 46	114 54
	Activity: A104 Review/analyze								
	Description: Analysis/Strategy Review/Analyze issues re comparison of final order to proposed order submitted with stipulation / PUCT/Non-Discovery Pleadings and Motions								
	Adjustment: 10/13/2020 - Amount adjusted by 23 46 - system, system								
	Reason for Adjustment: Discount Agreement								
Comments to Requestor: 17% discount to vendor fees per billing discount agreement									
5	09/09/2020	Fee	L430 Written Motions/Submissions	Green, Stephanie	230 00	2 70	105 57	105 57	515 43
	Activity: A104 Review/analyze								
	Description: Written Motions and Submissions Review/Analyze AEP proposed order and compare to submitted proposed order / PUCT/Overall Case Administration								
	Adjustment: 10/13/2020 - Amount adjusted by 105 57 - system, system								
	Reason for Adjustment: Discount Agreement								
Comments to Requestor: 17% discount to vendor fees per billing discount agreement									
6	09/09/2020	Fee	L120 Analysis/Strategy	Green, Stephanie	230 00	0 20	7 82	7 82	38 18
	Activity: A104 Review/analyze								
Description: Analysis/Strategy Review/Analyze and highlight potential issues with OPDM revisions to proposed order submitted with settlement for review / PUCT/Overall Case Administration									



	<b>Adjustment:</b> 10/13/2020 - Amount adjusted by 7 82 - system, system <b>Reason for Adjustment:</b> Discount Agreement <b>Comments to Requestor:</b> 17% discount to vendor fees per billing discount agreement								
7	09/10/2020	Fee	L210 Pleadings	Pearsall, Patrick	345 00	1 40	82 11	82 11	400 89
	<b>Activity:</b> A104 Review/analyze <b>Description:</b> Pleadings Review/Analyze proposed final order and analyze necessity of potential corrections / PUCT/Overall Case Strategy  <b>Adjustment:</b> 10/13/2020 - Amount adjusted by 82 11 - system, system <b>Reason for Adjustment:</b> Discount Agreement <b>Comments to Requestor:</b> 17% discount to vendor fees per billing discount agreement								
8	09/10/2020	Fee	L120 Analysis/Strategy	Pearsall, Patrick	345 00	0 10	5 86	5 86	28 64
	<b>Activity:</b> A106 Communicate (with client) <b>Description:</b> Analysis/Strategy Communicate with client J Jackson re proposed order / PUCT/Overall Case Strategy  <b>Adjustment:</b> 10/13/2020 - Amount adjusted by 5 86 - system, system <b>Reason for Adjustment:</b> Discount Agreement <b>Comments to Requestor:</b> 17% discount to vendor fees per billing discount agreement								
9	09/10/2020	Fee	L430 Written Motions/Submissions	Green, Stephanie	230 00	0 10	3 91	3 91	19 09
	<b>Activity:</b> A104 Review/analyze <b>Description:</b> Written Motions and Submissions Review/Analyze feedback regarding OPDM revisions to proposed order / PUCT/Overall Case Administration  <b>Adjustment:</b> 10/13/2020 - Amount adjusted by 3 91 - system, system <b>Reason for Adjustment:</b> Discount Agreement <b>Comments to Requestor:</b> 17% discount to vendor fees per billing discount agreement								
10	09/10/2020	Fee	L120 Analysis/Strategy	Green, Stephanie	230 00	0 20	7 82	7 82	38 18
	<b>Activity:</b> A106 Communicate (with client) <b>Description:</b> Analysis/Strategy Communicate with client M Gage, J Frederick et al re OPDM revisions to memo, comments for client group review, and re-filing of corrections / PUCT/Overall Case Administration  <b>Adjustment:</b> 10/13/2020 - Amount adjusted by 7 82 - system, system <b>Reason for Adjustment:</b> Discount Agreement <b>Comments to Requestor:</b> 17% discount to vendor fees per billing discount agreement								
11	09/10/2020	Fee	L120 Analysis/Strategy	Green, Stephanie	230 00	0 10	3 91	3 91	19 09
	<b>Activity:</b> A104 Review/analyze <b>Description:</b> Analysis/Strategy Review/Analyze response to inquiry re cost cap calculation revision from J Jackson / PUCT/Overall Case Strategy  <b>Adjustment:</b> 10/13/2020 - Amount adjusted by 3 91 - system, system <b>Reason for Adjustment:</b> Discount Agreement <b>Comments to Requestor:</b> 17% discount to vendor fees per billing discount agreement								
12	09/11/2020	Fee	L210 Pleadings	Pearsall, Patrick	345 00	0 50	29 32	29 32	143 18
	<b>Activity:</b> A103 Draft/revise <b>Description:</b> Pleadings Draft/Revise pleading re corrections to proposed final order / PUCT/Non-Discovery Pleadings and Motions  <b>Adjustment:</b> 10/13/2020 - Amount adjusted by 29 32 - system, system <b>Reason for Adjustment:</b> Discount Agreement <b>Comments to Requestor:</b> 17% discount to vendor fees per billing discount agreement								
13	09/11/2020	Fee	L460 Post-Trial Motions and Submissions	Green, Stephanie	230 00	0 70	27 37	27 37	133 63
	<b>Activity:</b> A103 Draft/revise <b>Description:</b> Post-Trial Motions and Submissions Draft/Revise pleading re proposed corrections to proposed order / PUCT/Overall Case Administration  <b>Adjustment:</b> 10/13/2020 - Amount adjusted by 27 37 - system, system <b>Reason for Adjustment:</b> Discount Agreement <b>Comments to Requestor:</b> 17% discount to vendor fees per billing discount agreement								
14	09/11/2020	Fee	L460 Post-Trial Motions and Submissions	Green, Stephanie	230 00	0 20	7 82	7 82	38 18
	<b>Activity:</b> A104 Review/analyze <b>Description:</b> Post-Trial Motions and Submissions Review/Analyze feedback and revisions to proposed corrections pleading / PUCT/Overall Case Administration  <b>Adjustment:</b> 10/13/2020 - Amount adjusted by 7 82 - system, system <b>Reason for Adjustment:</b> Discount Agreement <b>Comments to Requestor:</b> 17% discount to vendor fees per billing discount agreement								
15	09/11/2020	Fee	L460 Post-Trial Motions and Submissions	Green, Stephanie	230 00	0 10	3 91	3 91	19 09
	<b>Activity:</b> A106 Communicate (with client)								

			<b>Description:</b> Post-Trial Motions and Submissions Communicate with client M Gage, J Frederick et al re draft proposed order corrections/ PUCT/Overall Case Administration <b>Adjustment:</b> 10/13/2020 - Amount adjusted by 3 91 - system, system <b>Reason for Adjustment:</b> Discount Agreement <b>Comments to Requestor:</b> 17% discount to vendor fees per billing discount agreement						
16	09/14/2020	Fee	L210 Pleadings	Pearsall, Patrick	345 00	0 20	11 73	11 73	57 27
	<b>Activity:</b> A108 Communicate (other external) <b>Description:</b> Pleadings Communicate with other external Staff counsel J Adkins re potential corrections to proposed order / PUCT/Non-Discovery Pleadings and Motions <b>Adjustment:</b> 10/13/2020 - Amount adjusted by 11 73 - system, system <b>Reason for Adjustment:</b> Discount Agreement <b>Comments to Requestor:</b> 17% discount to vendor fees per billing discount agreement								
17	09/14/2020	Fee	L210 Pleadings	Pearsall, Patrick	345 00	1 10	64 52	64 52	314 98
	<b>Activity:</b> A104 Review/analyze <b>Description:</b> Pleadings Review/Analyze and revise notice of corrections to proposed order / PUCT/Non-Discovery Pleadings and Motions <b>Adjustment:</b> 10/13/2020 - Amount adjusted by 64 52 - system, system <b>Reason for Adjustment:</b> Discount Agreement <b>Comments to Requestor:</b> 17% discount to vendor fees per billing discount agreement								
18	09/14/2020	Fee	L120 Analysis/Strategy	Pearsall, Patrick	345 00	0 60	35 19	35 19	171 81
	<b>Activity:</b> A106 Communicate (with client) <b>Description:</b> Analysis/Strategy Communicate with client L Melhem and litigation team re corrections to proposed order / PUCT/Overall Case Strategy. <b>Adjustment:</b> 10/13/2020 - Amount adjusted by 35 19 - system, system <b>Reason for Adjustment:</b> Discount Agreement <b>Comments to Requestor:</b> 17% discount to vendor fees per billing discount agreement								
19	09/14/2020	Fee	L460 Post-Trial Motions and Submissions	Green, Stephanie	230 00	0 50	19 55	19 55	95 45
	<b>Activity:</b> A106 Communicate (with client) <b>Description:</b> Post-Trial Motions and Submissions Communicate with client P Osterloh and R Fahrlender re OPDM revisions to proposed order / PUCT/Overall Case Administration <b>Adjustment:</b> 10/13/2020 - Amount adjusted by 19 55 - system, system <b>Reason for Adjustment:</b> Discount Agreement <b>Comments to Requestor:</b> 17% discount to vendor fees per billing discount agreement								
20	09/14/2020	Fee	L460 Post-Trial Motions and Submissions	Green, Stephanie	230 00	0 10	3 91	3 91	19 09
	<b>Activity:</b> A104 Review/analyze <b>Description:</b> Post-Trial Motions and Submissions Review/Analyze correspondence from Staff re circulating draft corrections pleading / PUCT/Overall Case Administration <b>Adjustment:</b> 10/13/2020 - Amount adjusted by 3 91 - system, system <b>Reason for Adjustment:</b> Discount Agreement <b>Comments to Requestor:</b> 17% discount to vendor fees per billing discount agreement								
21	09/14/2020	Fee	L460 Post-Trial Motions and Submissions	Green, Stephanie	230 00	0 30	11 73	11 73	57 27
	<b>Activity:</b> A106 Communicate (with client) <b>Description:</b> Post-Trial Motions and Submissions Communicate with client M Gage, J Fredenck et al re revised corrections pleading and incorporate input from same / PUCT/Overall Case Administration <b>Adjustment:</b> 10/13/2020 - Amount adjusted by 11 73 - system, system <b>Reason for Adjustment:</b> Discount Agreement <b>Comments to Requestor:</b> 17% discount to vendor fees per billing discount agreement								
22	09/14/2020	Fee	L460 Post-Trial Motions and Submissions	Green, Stephanie	230 00	0 20	7 82	7 82	38 18
	<b>Activity:</b> A106 Communicate (with client) <b>Description:</b> Post-Trial Motions and Submissions Communicate with client M Gage et al re corrections and issues noted re OPDM revised proposed order / PUCT/Overall Case Administration <b>Adjustment:</b> 10/13/2020 - Amount adjusted by 7 82 - system, system <b>Reason for Adjustment:</b> Discount Agreement <b>Comments to Requestor:</b> 17% discount to vendor fees per billing discount agreement								
23	09/15/2020	Fee	L210 Pleadings	Pearsall, Patrick	345 00	0 30	17 60	17 60	85 90
	<b>Activity:</b> A104 Review/analyze <b>Description:</b> Pleadings Review/Analyze issues re finalizing notice of corrections to proposed final order / PUCT/Non-Discovery Pleadings and Motions <b>Adjustment:</b> 10/13/2020 - Amount adjusted by 17 60 - system, system								

	<b>Reason for Adjustment:</b> Discount Agreement <b>Comments to Requestor:</b> 17% discount to vendor fees per billing discount agreement								
24	09/15/2020	Fee	L210 Pleadings	Pearsall, Patrick	345 00	0 30	17 60	17 60	85 90
	<b>Activity:</b> A106 Communicate (with client) <b>Description:</b> Pleadings Communicate with client L. Melhem re notice of proposed corrections to final order / PUCT/Non-Discovery Pleadings and Motions <b>Adjustment:</b> 10/13/2020 - Amount adjusted by 17 60 - system, system <b>Reason for Adjustment:</b> Discount Agreement <b>Comments to Requestor:</b> 17% discount to vendor fees per billing discount agreement								
25	09/15/2020	Fee	L460 Post-Trial Motions and Submissions	Green, Stephanie	230 00	0 10	3 91	3 91	19 09
	<b>Activity:</b> A103 Draft/revise <b>Description:</b> Post-Trial Motions and Submissions Draft/Revise pleading to reflect parties' positions regarding corrections to be filed / PUCT/Overall Case Administration <b>Adjustment:</b> 10/13/2020 - Amount adjusted by 3 91 - system, system <b>Reason for Adjustment:</b> Discount Agreement <b>Comments to Requestor:</b> 17% discount to vendor fees per billing discount agreement								
26	09/15/2020	Fee	L460 Post-Trial Motions and Submissions	Green, Stephanie	230 00	0 40	15 64	15 64	76 36
	<b>Activity:</b> A108 Communicate (other external) <b>Description:</b> Post-Trial Motions and Submissions Communicate with other external TIEC, ARM, and Cities' counsel regarding filing of corrections / PUCT/Overall Case Administration <b>Adjustment:</b> 10/13/2020 - Amount adjusted by 15 64 - system, system <b>Reason for Adjustment:</b> Discount Agreement <b>Comments to Requestor:</b> 17% discount to vendor fees per billing discount agreement								
27	09/23/2020	Fee	L230 Court Mandated Conferences	Jones, Jackie	145 00	0 20	4 93	4 93	24 07
	<b>Activity:</b> A101 Plan and prepare for <b>Description:</b> Court Mandated Conferences Plan and prepare for 9/24/20 open meeting discussion / PUCT/File and Document Management <b>Adjustment:</b> 10/13/2020 - Amount adjusted by 4 93 - system, system <b>Reason for Adjustment:</b> Discount Agreement <b>Comments to Requestor:</b> 17% discount to vendor fees per billing discount agreement								
28	09/23/2020	Fee	L120 Analysis/Strategy	Green, Stephanie	230 00	0 30	11 73	11 73	57 27
	<b>Activity:</b> A104 Review/analyze <b>Description:</b> Analysis/Strategy Review/Analyze correspondence with clients M. Gage et al re commissioner memos filed in docket / PUCT/Overall Case Administration <b>Adjustment:</b> 10/13/2020 - Amount adjusted by 11 73 - system, system <b>Reason for Adjustment:</b> Discount Agreement <b>Comments to Requestor:</b> 17% discount to vendor fees per billing discount agreement								
29	09/23/2020	Fee	L120 Analysis/Strategy	Green, Stephanie	230 00	0 50	19 55	19 55	95 45
	<b>Activity:</b> A106 Communicate (with client) <b>Description:</b> Analysis/Strategy Communicate with client M. Gage and client group re open meeting and potential discussion points / PUCT/Overall Case Administration <b>Adjustment:</b> 10/13/2020 - Amount adjusted by 19 55 - system, system <b>Reason for Adjustment:</b> Discount Agreement <b>Comments to Requestor:</b> 17% discount to vendor fees per billing discount agreement								
30	09/23/2020	Fee	L120 Analysis/Strategy	Green, Stephanie	230 00	0 20	7 82	7 82	38 18
	<b>Activity:</b> A104 Review/analyze <b>Description:</b> Analysis/Strategy Review/Analyze R. Fahrlender email summarizing information for discussion points / PUCT/Overall Case Administration <b>Adjustment:</b> 10/13/2020 - Amount adjusted by 7 82 - system, system <b>Reason for Adjustment:</b> Discount Agreement <b>Comments to Requestor:</b> 17% discount to vendor fees per billing discount agreement								
31	09/23/2020	Fee	L120 Analysis/Strategy	Green, Stephanie	230 00	0 10	3 91	3 91	19 09
	<b>Activity:</b> A104 Review/analyze <b>Description:</b> Analysis/Strategy Review/Analyze M. Gage email re discussion points in preparation for any commission questions / PUCT/Overall Case Administration <b>Adjustment:</b> 10/13/2020 - Amount adjusted by 3 91 - system, system <b>Reason for Adjustment:</b> Discount Agreement <b>Comments to Requestor:</b> 17% discount to vendor fees per billing discount agreement								
32	09/23/2020	Fee	L230 Court Mandated Conferences	Pearsall, Patrick	345 00	0 90	52 78	52 78	257 72

	<b>Activity:</b> A106 Communicate (with client) <b>Description:</b> Court Mandated Conferences Communicate with client M Gage, G Hughes, and litigation team re Commissioner D'Andrea memo and strategy for response to questions re same / PUCT/PUCT Open Meetings  <b>Adjustment:</b> 10/13/2020 - Amount adjusted by 52 78 - system, system <b>Reason for Adjustment:</b> Discount Agreement <b>Comments to Requestor:</b> 17% discount to vendor fees per billing discount agreement								
	09/23/2020	Fee	L230 Court Mandated Conferences	Pearsall, Patrick	345.00	0 50	29 32	29.32	143 18
33	<b>Activity:</b> A104 Review/analyze <b>Description:</b> Court Mandated Conferences Review/Analyze Chairman Walker and Commissioner D'Andrea memos and prepare for Open Meeting discussion / PUCT/PUCT Open Meetings  <b>Adjustment:</b> 10/13/2020 - Amount adjusted by 29 32 - system, system <b>Reason for Adjustment:</b> Discount Agreement <b>Comments to Requestor:</b> 17% discount to vendor fees per billing discount agreement								
	09/24/2020	Fee	L230 Court Mandated Conferences	Pearsall, Patrick	345 00	0 40	23 46	23 46	114 54
34	<b>Activity:</b> A109 Appear for/attend <b>Description:</b> Court Mandated Conferences Appear for/attend Open Meeting / PUCT/PUCT Open Meetings  <b>Adjustment:</b> 10/13/2020 - Amount adjusted by 23 46 - system, system <b>Reason for Adjustment:</b> Discount Agreement <b>Comments to Requestor:</b> 17% discount to vendor fees per billing discount agreement								
	09/24/2020	Fee	L230 Court Mandated Conferences	Pearsall, Patrick	345 00	0 40	23 46	23 46	114 54
35	<b>Activity:</b> A104 Review/analyze <b>Description:</b> Court Mandated Conferences Review/Analyze issues re strategy for responses to Commissioner questions and communicate with G Hughes and M Gage re same / PUCT/PUCT Open Meetings  <b>Adjustment:</b> 10/13/2020 - Amount adjusted by 23 46 - system, system <b>Reason for Adjustment:</b> Discount Agreement <b>Comments to Requestor:</b> 17% discount to vendor fees per billing discount agreement								

Completed Requests

Item	Request Name	Requestor	Request Date	Completion Date	Comment	Outcome
1	Post Invoice for 3,493 89 USD	Duggins Wren Mann & Romero, LLP	10/13/2020	10/20/2020		Approved
	<b>Approval History</b>					
	<b>Stop</b>	<b>Performer</b>	<b>Activity</b>	<b>Date/Time</b>	<b>Internal Comment</b>	
	1	Gage, Melissa	Approved	10/19/2020 09 50 PM		



**CITY ATTORNEY'S OFFICE**

P O Box 220  
McAllen, Texas 78505-0220  
956-681-1090 Office  
956-681-1099 Fax  
[www.mcallen.net](http://www.mcallen.net)

August 26, 2020

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

Re: Docket #50892; AEP TX 2021 EECRF Filing; Lloyd Gosselink; Inv. #97512425; Inv. #97513855

Dear Ms. Gage:

Pursuant to Public Utility Regulatory Act §33.023, please remit to the City of McAllen, Texas the sum of \$10,907.00 cover the fees and expenses of attorneys and consultants assisting the Steering Committee of Cities Served by AEP Texas Central Company in the above-referenced ratemaking proceeding.

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

FIRM	DOCKET	PERIOD	BILL AMOUNT
Lloyd Gosselink	50892 – AEP TX 2021 EECRF Filing	June 2020	\$3,602.00
Lloyd Gosselink	50892 - AEP TX 2021 EECRF Filing	July 2020	\$7,305.00
<b>Total</b>			<b>\$10,907.00</b>

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

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

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

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

Sincerely,

A handwritten signature in black ink, appearing to read "Kevin D. Pagan", with a stylized flourish at the end.

Kevin D. Pagan

KDP:av  
encls.



816 Congress Avenue, Suite 1900  
Austin, Texas 78701  
Telephone: (512) 322-5800  
Facsimile: (512) 472-0532  
[www.lglawfirm.com](http://www.lglawfirm.com)

July 8, 2020

Cities Served by AEP Texas Inc  
c/o City of McAllen  
Attn Kevin Pagan  
PO Box 220  
McAllen, TX USA 78505-0220

Invoice: 97512425  
Client: 3862  
Matter: 8  
Billing Attorney: JLM

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### INVOICE SUMMARY

For professional services and disbursements rendered through June 30, 2020:

**RE: AEP Texas 2021 EECRF Filing**

Professional Services	\$ 3,602.00
Total Disbursements	<u>\$ .00</u>
<b>TOTAL THIS INVOICE</b>	<b>\$ 3,602.00</b>

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Lloyd Gosselink Rochelle & Townsend, P.C.

**Lloyd Gosselink Rochelle & Townsend, P.C.**

Cities Served by AEP Texas Inc  
AEP Texas 2021 EECRF Filing  
I.D.3862-8-JLM

July 8, 2020  
Invoice: 97512425

**PROFESSIONAL SERVICES RENDERED**

<b>Date</b>	<b>Atty</b>	<b>Description Of Services Rendered</b>	<b>Hours</b>
6/01/20	TLB	Review filing; discuss filing with clients; coordinate consultants and attorney assignments (Administration).	.50
6/02/20	WPD	Draft engagement agreement; edit and finalize engagement agreement; draft motion to intervene (Administration).	.60
6/02/20	HEC	Proofread engagement letter with ReSolved Energy (Case Management/Admin).	.20
6/03/20	TLB	Review and finalize Motion to Intervene (Administration).	.20
6/03/20	WPD	Edit motion to intervene; edit engagement agreement (Administration).	.40
6/04/20	TLB	Prepare and distribute consultant agreements (Administration).	.20
6/04/20	JLM	Review Motion to Intervene; correspondence regarding same (Administration).	.40
6/04/20	WPD	Edit motion to intervene and arrange for filing (Administration).	.10
6/04/20	HEC	Review Order of Referral; calendar deadline (Case Management/Admin).	.10
6/05/20	TLB	Send client communication regarding filing; prepare engagement agreements; discuss filing with K. Nalepa (Administration).	.60
6/05/20	JLM	Correspondence regarding city coalition and participation (Administration).	.30
6/05/20	WPD	Review and respond to emails regarding city intervenors and supplemental motion to intervene; call with H. Campbell regarding tracking cities' participation; review and analyze PUC EECRF rules (Administration).	.50
6/05/20	HEC	Discuss tracking intervention with project team; review SOAH Order No. 1; calendar deadlines (Case Management/Admin).	.20
6/10/20	WPD	Prepare protective order certification cover letter and certifications; draft list of issues; continue drafting list of issues; edit list of issues and send to K. Nalepa (Administration).	1.10
6/10/20	HEC	Discuss protective order certification filing with project team (Case Management/Admin).	.10
6/10/20	HEC	Review correspondence; draft intervention tracking sheet for AEP cities (Case Management/Admin).	.20
6/11/20	WPD	Review and analyze EECRF application; draft summary of company's request (Administration).	.80
6/12/20	TLB	Review List of Issues (Administration).	.20
6/12/20	WPD	Review and finalize edits to list of issues; discussions with K. Nalepa and J. Mauldin regarding procedural schedule (Administration).	.30
6/15/20	WPD	Edit Cities' First RFI to AEP (Discovery).	.30
6/15/20	WPD	Prepare and finalize protective order certification filings (Administration).	.20
6/16/20	JLM	Review filings (Administration).	.30
6/16/20	HEC	Review SOAH Order No. 2; case management; calendar deadlines (Case Management/Admin).	.40
6/16/20	HEC	Review correspondence; case management; update AEP cities intervention tracking sheet (Case Management/Admin).	.10
6/17/20	TLB	Prepare client engagement letters (Administration).	.20

Lloyd Gosselink Rochelle & Townsend, P.C.

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**Lloyd Gosselink Rochelle & Townsend, P.C.**

Cities Served by AEP Texas Inc  
AEP Texas 2021 EECRF Filing  
I.D.3862-8-JLM

July 8, 2020  
Invoice: 97512425

Date	Atty	Description Of Services Rendered	Hours
6/18/20	TLB	Review filings (Administration).	.30
6/18/20	WPD	Email AEP regarding confidential portions of application and testimony (Administration)	.10
6/18/20	HEC	Review intervention tracking sheet; draft Supplemental Motion to Intervene (Case Management/Admin).	.30
6/19/20	WPD	Edit supplemental motion to intervene (Administration).	.40
6/22/20	WPD	Review procedural deadlines and emails regarding settlement conference date and time; call with K. Nalepa regarding preparation of settlement position and settlement conference dates (Administration).	.20
6/22/20	HEC	Proofread Cities' Supplemental Motion to Intervene; case management; prepare same for filing with the PUC; e-file same; email correspondences (Case Management/Admin).	.60
6/24/20	SJW	Update Intervention track chart (Administration).	.10
6/25/20	WPD	Call with K. Nalepa regarding settlement issues; call with J. Mauldin regarding EECRF status and settlement issues (Administration).	.40
6/25/20	WPD	Draft email to AEP regarding RFI responses not being filed on time; forward RFI responses to K. Nalepa (Discovery).	.20
6/26/20	JLM	Review RFI responses (Administration).	.30
6/26/20	WPD	Call with K. Nalepa regarding issues with filing and RFI responses; call with J. Mauldin regarding issues with filing and RFI responses (Discovery).	.20
6/29/20	WPD	Attend settlement conference; call with T. Brocato to update him on rate case issues and settlement status; summarize settlement conference for J. Mauldin; call with K. Nalepa regarding settlement follow-up; review AEP's counteroffer on Cities' proposed adjustment; discuss with J. Mauldin (Administration).	.80
6/30/20	WPD	Discuss AEP's settlement offer with K. Nalepa and J. Mauldin; draft response email to company, accepting settlement offer; respond to Commission Staff's email regarding status of settlement and plans on requesting hearing or not; call with Staff regarding potential issue with intervenor testimony deadline; discuss Staff's timing issue with K. Nalepa regarding request for a hearing affecting intervenor testimony deadline (Administration).	.70

**TOTAL PROFESSIONAL SERVICES****\$ 3,602.00****SUMMARY OF PROFESSIONAL SERVICES**

Name	Staff Level	Hours	Rate	Total
Thomas L Brocato	Principal	2.20	440.00	968.00
Jamie L Mauldin	Principal	1.30	300.00	390.00
W Patrick Dinnin	Associate	7.30	265.00	1,934.50
Sam J Weaver	Paralegal	.10	125.00	12.50
Hanna E Campbell	Paralegal	2.20	135.00	297.00
<b>TOTALS</b>		<b>13.10</b>		<b>\$ 3,602.00</b>

Lloyd Gosselink Rochelle &amp; Townsend, P.C.

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**Lloyd Gosselink Rochelle & Townsend, P.C.**

Cities Served by AEP Texas Inc  
AEP Texas 2021 EECRF Filing  
I.D.3862-8-JLM

July 8, 2020  
Invoice: 97512425

**TOTAL THIS INVOICE**

**\$ 3,602.00**

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Lloyd Gosselink Rochelle & Townsend, P.C.

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816 Congress Avenue, Suite 1900  
Austin, Texas 78701  
Telephone: (512) 322-5800  
Facsimile: (512) 472-0532  

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www.lglawfirm.com

August 26, 2020

Cities Served by AEP Texas Inc  
c/o City of McAllen  
Attn Kevin Pagan  
PO Box 220  
McAllen, TX USA 78505-0220

Invoice: 97513855  
Client: 3862  
Matter: 8  
Billing Attorney: JLM

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### INVOICE SUMMARY

For professional services and disbursements rendered through July 31, 2020:

**RE: AEP Texas 2021 EECRF Filing**

Professional Services	\$ 3,471.00
Total Disbursements	<u>\$ 3,834.00</u>
<b>TOTAL THIS INVOICE</b>	<b>\$ 7,305.00</b>

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Lloyd Gosselink Rochelle & Townsend, P.C.

**Lloyd Gosselink Rochelle & Townsend, P.C.**

Cities Served by AEP Texas Inc  
AEP Texas 2021 EECRF Filing  
I.D.3862-8-JLM

August 26, 2020  
Invoice: 97513855

**PROFESSIONAL SERVICES RENDERED**

Date	Atty	Description Of Services Rendered	Hours
7/01/20	TLB	Review filings, settlement strategy and options (Administration).	.40
7/01/20	WPD	Review motion to abate and respond to company (Administration).	.10
7/06/20	WPD	Update EECRF tracking chart with AEP EECRF details; draft Cities' second supplemental motion to intervene (Administration).	.50
7/06/20	SJW	Review SOAH Order No. 3 and calendar deadlines.	.10
7/07/20	WPD	Draft affidavit for rate case testimony; discuss EECRF, testimony; affidavits, and client approval with T. Brocato (Administration).	1.20
7/07/20	WPD	Call with S. Weaver regarding rate case expense summary spreadsheet and updating numbers (Rate Case Expenses).	.20
7/08/20	WPD	Summarize settlement; draft letter to cities regarding approval of settlement; review edits to second supplemental motion to intervene; arrange filing of the same (Administration).	1.40
7/08/20	SJW	Update expense tracking chart and assemble invoices; review Cities' 2nd Supplemental Motion to Intervene; finalize and file Cities' 2nd Supplemental Motion to Intervene.	.70
7/09/20	TLB	Prepare and distribute client settlement update (Administration).	.40
7/09/20	WPD	Review and edit K. Nalepa testimony; edit draft affidavit; review attachments and invoices for rate case expense testimony (Administration).	1.00
7/10/20	TLB	Review testimony (Administration).	1.00
7/10/20	JLM	Review K. Nalepa testimony and follow-up correspondence regarding same (Administration).	.40
7/10/20	WPD	Review edits to testimony filing and approve for filing (Administration).	.20
7/20/20	WPD	Analyze and edit settlement documents (Administration).	2.30
7/21/20	JLM	Call with P. Dinnin regarding settlement document revisions (Administration).	.60
7/21/20	WPD	Call with J. Mauldin regarding AEP proposed order language; call with J. Mauldin and P. Pearsall regarding proposed order language (Administration).	.30
7/22/20	WPD	Review and edit settlement documents; call with K. Nalepa regarding settlement provisions (Administration).	1.20
7/28/20	WPD	Review and analyze AEP proposed edits to settlement documents (Administration).	.20

**TOTAL PROFESSIONAL SERVICES**

**\$ 3,471.00**

**SUMMARY OF PROFESSIONAL SERVICES**

Name	Staff Level	Hours	Rate	Total
Thomas L Brocato	Principal	1.80	440.00	792.00
Jamie L Mauldin	Principal	1.00	300.00	300.00
W Patrick Dinnin	Associate	8.60	265.00	2,279.00
Sam J Weaver	Paralegal	.80	125.00	100.00

Lloyd Gosselink Rochelle & Townsend, P.C.

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**Lloyd Gosselink Rochelle & Townsend, P.C.**

Cities Served by AEP Texas Inc  
AEP Texas 2021 EECRF Filing  
I.D.3862-8-JLM

August 26, 2020  
Invoice: 97513855

<b>TOTALS</b>	<b>12.20</b>	<b>\$ 3,471.00</b>
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**DISBURSEMENTS**

<b>Date</b>	<b>Description</b>	<b>Amount</b>
6/30/20	ReSolved Energy Cons Voucher # - 000105372 ReSolved Energy Consulting, LLC, Consultant Services, Professional services for June 2020 regarding AEPTX 20 EECRF 50892 project, 07/02/2020	3,213.00
7/31/20	ReSolved Energy Cons Voucher # - 000105663 ReSolved Energy Consulting, LLC, Consultant Services, Professional services for July 2020 regarding AEPTX 20 EECRF 50892 project, 08/04/2020	621.00

**TOTAL DISBURSEMENTS** **\$ 3,834.00**

**TOTAL THIS INVOICE** **\$ 7,305.00**

## ReSolved Energy Consulting, LLC

11044 Research Blvd, A-420  
Austin, TX 78759

## Invoice

DATE	INVOICE NUMBER
7/2/2020	4624

### BILL TO

Thomas Brocato  
Lloyd Gosselink  
816 Congress Ave, # 1900  
Austin, Tx 78701

PROJECT			
LG AEPTX 20 EECRF 50892			
DESCRIPTION	HOURS	RATE	AMOUNT
Consulting (Nalepa)	11 9	270.00	3,213.00
Work Completed thru - June 30, 2020		<b>TOTAL DUE</b>	<b>\$3,213.00</b>

## Monthly Recap

Karl Nalepa

Date	Task	Hours
June 10, 2020	Review filing. (A/CM 1.0)	1.00
June 11, 2020	Review filing. Review and edit issues list. (A/CM 1.20)	1.20
June 12, 2020	Complete edits and send to P. Dinnin for review. Review filing and prepare discovery. Review draft procedural schedule. (A/CM 1.80)	1.80
June 15, 2020	Complete discovery and send to P. Dinnin for review. Work on analysis. (A/CM 0.50; A&G 0.80)	1.30
June 16, 2020	Work on analysis. (A&G 0.70)	0.70
June 19, 2020	Review responses to discovery. (A&G 0.50)	0.50
June 22, 2020	Call with P. Dinnin to discuss case status and schedule. Work on analysis. (A/CM 0.20; A&G 0.30)	0.50
June 23, 2020	Work on analysis. (A&G 1.0)	1.00
June 25, 2020	Work on analysis and adjustments. (A&G 0.70)	0.70
June 26, 2020	Review responses to discovery. Work on analysis and adjustments. (A&G 1.50)	1.50
June 29, 2020	Work on adjustments. Prepare for and participate on settlement call with parties. Calls with P. Dinnin to discuss meeting and settlement offer. (A&G 0.50; A/CM 1.0)	1.50
June 30, 2020	Call with P. Dinnin regarding response to settlement offer. (A/CM 0.20)	0.20

**11.90**

A/CM = Administration/Case Management

A&G = Administrative & General

## ReSolved Energy Consulting, LLC

11044 Research Blvd, A-420  
Austin, TX 78759

## Invoice

DATE	INVOICE NUMBER
8/4/2020	4637

### BILL TO

Thomas Brocato  
Lloyd Gosselink  
816 Congress Ave, # 1900  
Austin, Tx 78701

PROJECT			
LG AEPTX 20 EECRF 50892			
DESCRIPTION	HOURS	RATE	AMOUNT
Consulting (Nalepa)	2.3	270.00	621.00
Work Completed thru - July 31, 2020		<b>TOTAL DUE</b>	<b>\$621.00</b>

## Monthly Recap

Karl Nalepa

Date	Task	Hours
July 1, 2020	Call with P. Dinnin regarding settlement status.	0.20
July 8, 2020	Prepare RCE testimony and send to P. Dinnin for review.	1.30
July 22, 2020	Review settlement documents and case files.	0.80
		<b>2.30</b>





816 Congress Avenue, Suite 1900  
Austin, Texas 78701  
Telephone: (512) 322-5800  
Facsimile: (512) 472-0532  
[www.lglawfirm.com](http://www.lglawfirm.com)

August 26, 2020

Cities Served by AEP Texas Inc  
c/o City of McAllen  
Attn Kevin Pagan  
PO Box 220  
McAllen, TX 78505-0220 USA

Client: 3862  
Matter: 8  
Billing Atty.: JLM

## REMINDER STATEMENT

RE: AEP Texas 2021 EECRF Filing

Invoice Number	Invoice Date	Fees	Expenses	Invoice Total	Payments/Credits	Balance
97512425	July 08, 2020	3,602.00	0.00	3,602.00	0.00	3,602.00
Total Amount Due:						<u>\$3,602.00</u>

## AGED ACCOUNTS RECEIVABLE

0 - 30 Days	31 - 60 Days	61 - 90 Days	91 - 120 Days	Over 120 Days
-	3,602.00	-	-	-

Lloyd Gosselink Rochelle & Townsend, P.C.



CITY ATTORNEY'S OFFICE

P O Box 220  
McAllen, Texas 78505-0220  
956-681-1090 Office  
956-681-1099 Fax  
[www.mcallen.net](http://www.mcallen.net)

October 22, 2020

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

Re: Docket #50892; AEP TX 2021 EECRF Filing; Lloyd Gosselink; Inv. #97515384

Dear Ms. Gage:

Pursuant to Public Utility Regulatory Act §33.023, please remit to the City of McAllen, Texas the sum of \$176.00 cover the fees and expenses of attorneys and consultants assisting the Steering Committee of Cities Served by AEP Texas Central Company in the above-referenced ratemaking proceeding.

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

FIRM	DOCKET	PERIOD	BILL AMOUNT
Lloyd Gosselink	50892 – AEP TX 2021 EECRF Filing	Sept 2020	\$176.00

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

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

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

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

Sincerely,

A handwritten signature in black ink, appearing to read "K. D. Pagan", with a stylized flourish at the end.

Kevin D. Pagan

KDP:av  
encls.



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October 22, 2020

Cities Served by AEP Texas Inc  
c/o City of McAllen  
Attn Kevin Pagan  
PO Box 220  
McAllen, TX USA 78505-0220

Invoice: 97515384  
Client: 3862  
Matter: 8  
Billing Attorney: JLM

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### INVOICE SUMMARY

For professional services and disbursements rendered through September 30, 2020:

**RE: AEP Texas 2021 EECRF Filing**

Professional Services	\$ 176.00
Total Disbursements	<u>\$ .00</u>
<b>TOTAL THIS INVOICE</b>	<b>\$ 176.00</b>

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Lloyd Gosselink Rochelle & Townsend, P.C.

**Lloyd Gosselink Rochelle & Townsend, P.C.**

Cities Served by AEP Texas Inc  
AEP Texas 2021 FECRF Filing  
I.D.3862-8-JLM

October 22, 2020  
Invoice: 97515384

**PROFESSIONAL SERVICES RENDERED**

Date	Atty	Description Of Services Rendered	Hours
9/15/20	TLB	Review filings and the proposed order (Administration).	.40

**TOTAL PROFESSIONAL SERVICES** **\$ 176.00**

**SUMMARY OF PROFESSIONAL SERVICES**

Name	Staff Level	Hours	Rate	Total
Thomas L Brocato	Principal	.40	440.00	176.00
<b>TOTALS</b>		<b>.40</b>		<b>\$ 176.00</b>

**TOTAL THIS INVOICE** **\$ 176.00**