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**SOAH DOCKET NO. 473-21-3114
PUC DOCKET NO. 52397**

APPLICATION OF SOUTHWESTERN	§	BEFORE THE STATE OFFICE
ELECTRIC POWER COMPANY TO	§	
IMPLEMENT A NET INTERIM FUEL	§	OF
SURCHARGE	§	ADMINISTRATIVE HEARING

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

SEPTEMBER 13, 2021

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Question No. CARD 1-1:

Please provide copies of SWEPCO's responses to formal or informal discovery requests from other parties in this case.

Response No. CARD 1-1:

SWEPCO's responses to formal discovery requests can be viewed at the following website:

<http://interchange.puc.texas.gov/search/filings/?UtilityType=A&ControlNumber=52397&ItemMatch=Equal&DocumentType=ALL&SortOrder=Ascending>

SWEPCO has not responded to any informal discovery requests from parties in this case.

Prepared By: Christopher N. Martel

Title: Regulatory Consultant Sr

Prepared By: Lynn M. Ferry-Nelson

Title: Dir Regulatory Svcs

Sponsored By: Thomas P. Brice

Title: VP Regulatory & Finance

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Question No. CARD 1-2:

Please provide the start date and end date of the February 2021 winter storm event ("2021 Winter Storm").

Response No. CARD 1-2:

The 2021 Winter Storm began Tuesday, February 9th and ended Saturday, February 20th.

Prepared By: Christopher N. Martel

Title: Regulatory Consultant Sr

Prepared By: Lynn M. Ferry-Nelson

Title: Dir Regulatory Svcs

Sponsored By: Thomas P. Brice

Title: VP Regulatory & Finance

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Question No. CARD 1-3:

Please provide an electronic file including workpapers supporting SWEPCO's calculation of extraordinary costs incurred due to the 2021 Winter Storm event.

Response No. CARD 1-3:

Please refer to SWEPCO witness Tiffany A. Day's direct testimony at page 7, lines 1-8, for a discussion of how SWEPCO identified the incremental fuel costs associated with the 2021 Winter Storm event. Please refer to CARD 1-3 Attachment 1 for an electronic file supporting SWEPCO's calculation of extraordinary costs incurred due to the 2021 Winter Storm Event. See CARD 1-3 HIGHLY SENSITIVE Attachments 2 to 7 for related supporting documentation.

SWEPCO notes that the requested surcharge in this case is not limited to its eligible fuel costs incurred during the 2021 Winter Storm event. Rather, SWEPCO is seeking to implement a net interim surcharge for materially under-collected fuel costs incurred through June 30, 2021. Ms. Day presents and describes the calculation of SWEPCO's adjusted Texas retail jurisdictional fuel under-recovered balance through June 30, 2021, in her direct testimony

The attachment responsive to this request is HIGHLY SENSITIVE under the terms of the Protective Order. The HIGHLY SENSITIVE information is available for review at the Austin offices of American Electric Power Company (AEP), 400 West 15th Street, Suite 1520, Austin, Texas, 78701, (512) 481-4562, during normal business hours.

Prepared By: Joyce A. White

Title: Accountant Prin

Sponsored By: Tiffany A. Powell Day

Title: Regulatory Acctg Case Mgr

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Question No. CARD 1-4:

Please provide a breakdown of SWEPCO's estimate of the extraordinary cost of the February 2021 Winter Storm event for each day of the event.

Response No. CARD 1-4:

Please refer to the response to CARD 1-3 for the requested information.

Prepared By: Joyce A. White

Title: Accountant Prin

Sponsored By: Tiffany A. Powell Day

Title: Regulatory Acctg Case Mgr

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Question No. CARD 1-5:

Please provide SWEPCO's system average price of natural gas (\$/MMBtu) for each day of the 2021 Winter Storm event.

Response No. CARD 1-5:

Please refer to the response to CARD 1-14 for the commodity price of gas purchased on a daily basis. The Company has not calculated a system average price per day as that cost would include natural gas transportation costs, which are not maintained or calculated by SWEPCO on a daily basis.

Prepared By: Jon D. Holtzmuller

Title: Mng Dir Comcl Services

Prepared By: Anthony J. Bender

Title: Energy Settlements Mgr

Prepared By: Joyce A. White

Title: Accountant Prin

Sponsored By: Tiffany A. Powell Day

Title: Regulatory Acctg Case Mgr

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Question No. CARD 1-6:

Please provide SWEPCO's system average price of energy purchased (\$/MWh) from the SPP IM for each day of the 2021 Winter Storm event.

Response No. CARD 1-6:

Please refer to CARD 1-6 Attachment 1 for the requested information.

Prepared By: Jon D. Holtzmuller

Title: Mng Dir Comcl Services

Prepared By: Richard P. Quaintance

Title: Settlements Analysis Supv

Prepared By: Joyce A. White

Title: Accountant Prin

Sponsored By: Tiffany A. Powell Day

Title: Regulatory Acctg Case Mgr

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Question No. CARD 1-7:

Please provide any reports, presentations or testimony prepared by or for SWEPCO addressing the primary causes of and estimated abnormal fuel and purchased power costs incurred for the 2021 Winter Storm event.

Response No. CARD 1-7:

Please refer to SWEPCO's Application and the supporting Testimony of Thomas P. Brice filed in this case. Also, please see CARD 1-7 HIGHLY SENSITIVE Attachment 1, which is a confidential Powerpoint slide prepared by American Electric Power Company Service Corporation Regulatory department as a summary of the impact of the February 2021 winter storm in various jurisdictions and the proposed recovery mechanisms.

In addition to the testimony and exhibits in this proceeding, SWEPCO also submitted testimony regarding the winter storm in its Arkansas and Louisiana jurisdictions. Please see CARD 1-7 Attachment 2 for copies of the application and supporting testimony of Thomas P. Brice filed by SWEPCO with the Louisiana Public Service Commission (LPSC) on March 24, 2021. SWEPCO submitted testimony regarding the winter storm to the Arkansas Public Service Commission (APSC) in Docket No. 19-008-U. SWEPCO also submitted a report related to the winter storm in APSC Docket No. 21-036-U. Documents submitted in the two Arkansas proceedings may be found via this link: www.apscservices.info/efilings/docket_search.asp.

The attachment responsive to this request is HIGHLY SENSITIVE under the terms of the Protective Order. The HIGHLY SENSITIVE information is available for review at the Austin offices of American Electric Power Company (AEP), 400 West 15th Street, Suite 1520, Austin, Texas, 78701, (512) 481-4562, during normal business hours.

Prepared By: Christopher N. Martel

Title: Regulatory Consultant Sr

Prepared By: Lynn M. Ferry-Nelson

Title: Dir Regulatory Svcs

WILKINSON, CARMODY & GILLIAM

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March 24, 2021

**JOHN D. WILKINSON (1867-1929)
W. SCOTT WILKINSON (1895-1985)**

**ARTHUR R. CARMODY, JR.
OF COUNSEL**

Via Federal Express

Mr. Brandon Frey, Executive Secretary
Louisiana Public Service Commission
602 N. 5th Street
Baton Rouge, LA 70802

**In Re: Application of Southwestern Electric Power Company for (I)
Recovery of Winter Storm Fuel Costs Pursuant to the Commission's
Special Order Approved March 17, 2021; and (II) Expedited Relief**

Dear Terri:

Please find enclosed on behalf of SWEPCO in the above captioned docket the Application, Supporting Testimony of Thomas P. Brice and exhibit with requisite copies.


We have also enclosed an extra copy of this correspondence, which we request that you stamp as filed and return in the self-addressed stamped envelope.

As always, we appreciate your continued assistance and cooperation.

With best regards, I am

Yours very truly,

WILKINSON, CARMODY & GILLIAM

By: 
Bobby S. Gilliam
Jonathan P. McCartney

JPM/mml
Enclosure

DOCKET NO: _____

BEFORE THE

LOUISIANA PUBLIC SERVICE COMMISSION

**APPLICATION OF SOUTHWESTERN ELECTRIC POWER COMPANY FOR
(I) RECOVERY OF WINTER STORM FUEL COSTS PURSUANT TO THE
COMMISSION'S SPECIAL ORDER APPROVED MARCH 17, 2021; AND
(II) EXPEDITED RELIEF**

I. APPLICANT AND SUMMARY OF REQUEST

The Applicant, Southwestern Electric Power Company (SWEPCO or the Company), is a vertically-integrated electric public utility, with headquarters in Shreveport, Louisiana, that has provided service to Louisiana customers for over 108 years, as well as service to customers in Arkansas and Texas. As a public utility within the meaning of La. R.S. 45:1161, SWEPCO is subject to the jurisdiction of, and regulation by, the Louisiana Public Service Commission (LPSC or Commission) as to its rates and service.

SWEPCO is filing this Application to request authorization for recovery of its Winter Storm Fuel Costs pursuant to the requirements of the Commission's Order approved March 17, 2021, as it is in the public interest. In light of the extraordinary circumstances surrounding the February 2021 Winter Storm Event, SWEPCO is respectfully requesting expedited consideration of its request to spread the Winter Storm Energy Costs over five (5) years beginning with the first billing cycle of April 2021, as further described by SWEPCO witness, Thomas P. Brice, Vice President Regulatory and Finance, in his Direct Testimony with supporting exhibits.

II. THE NEED FOR EXPEDITED APPROVAL OF SWEPCO'S PROPOSED FIVE (5) YEAR RECOVERY PLAN

A. The February 2021 Winter Storm Event Caused an Unprecedented Increase in Energy Costs Needed to Serve Customers:

One of the most severe Winter Storm Events on record in over 100 years struck north Louisiana during the period of February 9th through February 20th 2021, (the “Winter Storm”), with temperatures falling below zero in some locations and unprecedented snow and ice accumulation, which severely impacted SWEPCO’s service territory. This severe winter weather that occurred throughout SWEPCO’s service territory and much of the United States on February 9 through February 20, 2021, caused a significant increase in natural gas prices, purchase power, and Southwest Power Pool (SPP) energy-related costs (collectively, Energy Costs). In addition, the SPP issued reliability, must-run directions during the February severe weather event that required SWEPCO and other market participants to run generators in order to avoid a system-wide failure of the electric grid. The combination of the must-run directive from the SPP, the extreme temperatures, and the significant spike in natural gas prices resulted in unprecedented Energy Costs, as further discussed by SWEPCO Witness Mr. Brice.

B. The Commission’s Special Order Approved March 17, 2021, Authorizes the Executive Secretary to Review and Approve Utility-specific Requests for Modification to the Commission’s General Order dated November 6, 1997:

At the March 17, 2021 B&E meeting, the Commission approved a Special Order granting a temporary modification to the Commission’s General Order dated November 6, 1997, U-21497, *In Re: Development of standards governing the treatment and allocation of fuel costs by electric utility companies*, (FAC General Order), which allows the

Commission's Executive Secretary the authority to review and approve utility specific requests for modification to the FAC. This March 17, 2021 Special Order authorizes the Executive Secretary to approve a utility's proposal to spread the costs of the Winter Storm Event over a longer period of time for the benefit of customers. As set forth in the Special Order approved March 17, 2021, any approved modification and associated recovery will either be subject to the audit provisions of the Commission's FAC or a separate audit initiated by the Commission to review fuel costs associated with the Winter Storm Event.

C. SWEPCO's Proposal to Recover its Winter Storm Event Fuel Costs over a Five (5) Year Period Immediately Benefits Customers by Mitigating the Impact of Unexpected and Unavoidably Higher Fuel Costs:

SWEPCO is respectfully requesting expedited consideration of its proposal to recover the Energy Costs incurred as a result of the Winter Storm Event over five (5) years, together with the Company's pre-tax rate of return as established in Docket No. U-34806, beginning with SWEPCO's first billing cycle of April 2021. Recovery would be through an increase in the FAC charges already on customer bills. Long-standing Commission precedent allows those Energy Costs to be collected from SWEPCO's customers. However, recovering the Energy Costs SWEPCO incurred during the severe weather event over the normal one-month recovery period could impose a financial burden on SWEPCO's customers, as further discussed by Mr. Brice in his Direct Testimony.

SWEPCO's recovery of these Energy Costs in the proposed manner will be subject to refund and review through the Commission's normal biennial fuel cost review. In addition, SPP bills are subject to future settlements, which can affect the final costs estimated by SWEPCO at this time. SWEPCO will keep the Commission informed of any changes as necessary. The Company's proposal to recover costs over five (5) years is in


the public interest and consistent with the objectives outlined by the Commission in the March 17, 2021 Special Order, and will help address the concerns expressed by the Commission by lowering the monthly charge to SWEPCO's Louisiana customers.

III. CONCLUSION

WHEREFORE, pursuant to the provisions of the March 17, 2021 Special Order, SWEPCO respectfully requests that the Executive Secretary of the Commission issue expedited approval that SWEPCO's proposal to recover its Winter Storm Event fuel costs over the five (5) year period beginning with the first billing cycle of April 2021, be granted, subject to subsequent Commission review.

Respectfully submitted,

WILKINSON CARMODY & GILLIAM



Bobby S. Gilliam, La Bar Roll No. 6227

Jonathan P. McCartney, La Bar Roll No. 31508

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Post Office Box 1707
Shreveport, Louisiana 71166
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**COUNSEL FOR SOUTHWESTERN
ELECTRIC POWER COMPANY**

**BEFORE THE
LOUISIANA PUBLIC SERVICE COMMISSION**

**APPLICATION OF SOUTHWESTERN ELECTRIC
POWER COMPANY FOR (I) RECOVERY
OF WINTER STORM FUEL COSTS
PURSUANT TO THE COMMISSION SPECIAL
ORDER APPROVED MARCH 17, 2021
(II) EXPEDITED RELIEF**

DOCKET NO. U- _____

THOMAS P. BRICE

ON BEHALF OF

SOUTHWESTERN ELECTRIC POWER COMPANY

MARCH, 2021

I. INTRODUCTION

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

A. My name is Thomas P. Brice, and my position is Vice President of Regulatory and Finance for Southwestern Electric Power Company (SWEPCO or Company). My business address is 428 Travis Street, Shreveport, Louisiana 71156.

Q. WOULD YOU BRIEFLY DESCRIBE YOUR EDUCATIONAL AND PROFESSIONAL BACKGROUND?

A. I graduated from the University of Louisiana at Monroe (formerly Northeast Louisiana University) in 1985 with a Bachelor of Business Administration in Accounting and a minor in Finance. I am a certified public accountant and certified internal auditor. I am a member of the American Institute of Certified Public Accountants and the Louisiana State Society of Certified Public Accountants.

After graduation, I was employed by Reliant Energy (formerly Arkla, Inc.), which at the time was a vertically integrated natural gas company, in the internal audit department. Upon my departure in 1992, I was a senior auditor with primary responsibilities in contract and joint venture auditing.

In 1992, I was employed by SWEPCO as an audit manager and soon thereafter assumed the responsibilities of audit director on an interim basis in early 1993. My primary responsibilities as audit manager/interim audit director included managing the day-to-day operation of the department, ensuring successful completion of the annual audit plan, and reporting annual audit results to SWEPCO's Board of Directors.

1 From 1994 through 2004, I worked as a senior consultant for SWEPCO in the areas
2 of planning and analysis, business ventures and regulatory services. During this period of
3 time, I had the opportunity to manage a diverse set of projects for the Company.

4 In 2004, I assumed the position of Director, Business Operations Support. I was
5 responsible for the Company's financial plans and coordination with other organizations
6 within the American Electric Power Company, Inc. (AEP) system on matters directly
7 affecting SWEPCO's financial and operational results.

8 In June 2010, I assumed the responsibilities of Director, Regulatory Services. In
9 that role, I was responsible for SWEPCO regulatory matters in Arkansas, Texas, and
10 Louisiana. In May 2017, I assumed my current responsibilities of Vice President of
11 Regulatory and Finance.

12 **Q. WHAT ARE YOUR CURRENT RESPONSIBILITIES?**

13 **A.** I am responsible for the financial plans and coordination with other organizations within
14 the AEP system on matters directly affecting SWEPCO's financial and operational results,
15 which includes serving as the primary interface with the parent company, AEP. I am also
16 responsible for SWEPCO regulatory matters in the three retail jurisdictions and at the
17 wholesale level. I have responsibility for the preparation, filing, and litigation of regulatory
18 cases. Additionally, I am responsible for regulatory interactions, monitoring of regulatory
19 filings, participation in rulemakings, rate and tariff administration, and ensuring
20 compliance with regulatory requirements.

1 **Q. HAVE YOU APPEARED AS A WITNESS BEFORE ANY REGULATORY**
2 **COMMISSIONS?**

3 **A.** Yes. Recently I testified in Louisiana in Docket No. U-35441, SWEPCO's current rate
4 case pending before the Louisiana Public Service Commission (LPSC or Commission). I
5 have testified regarding SWEPCO's prior Formula Rate Plan (FRP) in Docket Nos. U-
6 34200 and U-32220. I also testified in SWEPCO's prior FRP in Docket No. U-23327,
7 Subdocket A, and SWEPCO's prior Fuel Audit Settlement in Docket No. U-23327,
8 Subdocket E. I have also testified concerning SWEPCO's Stall Combined Cycle Plant and
9 Turk Ultra-super Critical Plant in Docket No. U-29702 consolidated with Docket No. U-
10 27866, Subdocket B, as well as SWEPCO's purchase of Valley Electric Membership
11 Corporation (Valley) approved in Docket No. U-31351. I also previously testified in
12 support of SWEPCO's acquisition of long-term natural gas contracts in compliance with
13 the Commission's Gas Hedging Rule in Docket No. U-34354, as well as in support of
14 SWEPCO's environmental retrofits at the Flint Creek and Welsh solid-fuel power plants
15 in Docket No. U-34369. I also previously testified in support of SWEPCO's acquisition of
16 wind resources in Docket No. U-32814, Docket No. U-34619, and most recently in Docket
17 No. U-35324.

18
19 **II. TESTIMONY PURPOSE**

20 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?**

21 **A.** My testimony supports SWEPCO's proposed modification to the fuel adjustment clause
22 (FAC) that spreads the costs of the 2021 winter weather event over a longer period of time
23 rather than the one month recovery period pursuant to the FAC. This proposal is consistent

1 with the LPSC action during the March 17, 2021 Business and Executive (B & E) meeting,
2 wherein the LPSC authorized a temporary modification to the FAC to allow utilities to
3 spread the impact of the winter weather event for purposes of stabilizing costs to
4 SWEPCO's Louisiana customers.

5 **Q. PLEASE EXPLAIN WHY SWEPCO FILED THIS MOTION.**

6 **A.** SWEPCO's customers would otherwise face a large increase in their April 2021 electric
7 bills due to the impact of the extreme cold weather event in February 2021. The severe
8 winter weather that occurred throughout SWEPCO's service territory and much of the
9 United States on February 9 through February 20, 2021, caused a significant increase in
10 natural gas prices, purchase power, and Southwest Power Pool (SPP) energy-related costs
11 (collectively, Energy Costs). In addition, the SPP issued reliability, must-run directions
12 during the severe weather event that required SWEPCO and other market participants to
13 run generators in order to avoid a system-wide failure of the electric grid. The combination
14 of the must-run directive from the SPP, the extreme temperatures, and the significant spike
15 in natural gas prices resulted in unprecedented Energy Costs.

16 **Q. HOW DOES SWEPCO TYPICALLY RECOVER ENERGY COSTS FROM ITS**
17 **CUSTOMERS?**

18 **A.** Energy Costs are typically recovered from customers through SWEPCO's monthly fuel
19 factors. Under current LPSC rules, the impact of the winter weather event will flow
20 through the FAC in April (February costs are recovered with a two month lag in April).

21 **Q. HAS THE LPSC RECOGNIZED THE POTENTIAL IMPACT TO CUSTOMERS?**

22 **A.** Yes, it has. At the March 17, 2021 B&E meeting, the Commission approved a special
23 order granting a temporary modification to the FAC that allows the industry to spread the

costs of the winter weather event over a longer period of time. This action by the

Commission:

1. Approved temporary modification of the FAC to allow electric utilities to spread the costs over a longer period of time;
2. Approved temporary modification of the PGA (purchased gas adjustment) to allow gas utilities to spread the costs over a longer period of time; and
3. Authorized the Executive Secretary of the Commission to work directly with each utility to determine the best amortization period based on the utility's specific circumstances. The Executive Secretary may also open a docket to address the review and recovery period, if the Executive Secretary believes such action is necessary.

Through this filing, SWEPCO and the Executive Secretary will work collaboratively to determine the applicable recovery period and appropriate carrying costs to moderate the impact of the increased Energy Costs and lessen the otherwise immediate impact to SWEPCO's Louisiana customers.

Q. WHAT IS THE MAGNITUDE OF THE UNPRECEDENTED ENERGY COSTS FOR SWEPCO?

A. SWEPCO's estimated Energy Costs for the period of February 9-20, 2021 increased approximately \$150 million on a Louisiana jurisdictional basis during the winter storm event. On a total Company basis, SWEPCO incurred approximately \$500 million dollars in unexpected and unavoidable Energy Costs. In order to pay those costs, SWEPCO will be required to finance with debt and equity. Long-standing Commission precedent allows those Energy Costs to be collected from SWEPCO's customers. However, recovering the Energy Costs SWEPCO incurred during the severe weather event over the normal one-month recovery period could impose a financial burden on SWEPCO's customers.

1 **Q. HOW DOES SWEPCO PROPOSE TO AMELIORATE THE IMPACT TO**
2 **CUSTOMERS THAT COULD OTHERWISE BE EXPERIENCED THROUGH**
3 **THE OPERATION OF THE FAC?**

4 **A.** SWEPCO is proposing to recover the Energy Costs incurred as a result of the severe
5 weather event over five years, together with the Company's pre-tax rate of return as
6 established in Docket No. U-34806, beginning with the first billing cycle of April 2021.
7 Recovery would be through an increase in the FAC charges already on customer bills. The
8 recovery of these Energy Costs in this manner will be subject to refund and review through
9 the Commission's normal biennial fuel cost review. The recovery of the Energy Costs will
10 expire once the five-year amortization is completed.

11 **Q. WHAT IS THE IMPACT FROM THE WINTER STORM EVENT TO THE**
12 **TYPICAL LOUISIANA RESIDENTIAL CUSTOMER UNDER THE COMPANY'S**
13 **PROPOSAL?**

14 **A.** The typical Louisiana residential customer using 1000 kWh per month would pay an
15 additional \$6.10 per month over the five-year period as shown in Exhibit TPB-1.

16 **Q. ARE THE ESTIMATED COSTS SUBJECT TO FINAL RECONCILIATION?**

17 **A.** Yes. As discussed above, the amount is subject to refund and review through the
18 Commission's normal biennial fuel cost review. In addition, SPP bills are subject to future
19 settlements, which can affect the final costs estimated by SWEPCO at this time. SWEPCO
20 will keep the Commission informed of any changes as necessary.

21 **Q. IS THIS PROPOSED MODIFICATION OF THE FAC IN THE PUBLIC**
22 **INTEREST?**

1 **A.** Yes. Through its action at the March 17, 2021 B&E meeting, the Commission recognized
2 that utilities may have experienced significantly increased expenses related to fuel and
3 purchased power because of the severe winter events. The Commission authorized the
4 Executive Secretary to work directly with each utility to determine the best amortization
5 period based on the utility's specific circumstances to avoid dramatic impacts to its
6 customers. The Company's proposal is consistent with the objectives outlined by the
7 Commission, when it approved the temporary modification to the FAC. The FAC with the
8 extended amortization will help address the concerns expressed by the Commission by
9 lowering the monthly charge to SWEPCO's Louisiana customers.

10 **Q.** **HAS SWEPCO ALSO SOUGHT SIMILAR RECOVERY FOR WINTER STORM**
11 **FUEL EXPENSES IN OTHER JURISDICTIONS IT SERVES?**

12 **A.** Yes. SWEPCO has sought similar recovery for these winter storm fuel expenses with the
13 Arkansas Public Service Commission (APSC) in Docket No. 19-008-U. The APSC Staff
14 has reviewed and made a filing supporting SWEPCO's recovery proposal.

15 **Q.** **DOES THAT CONCLUDE YOUR TESTIMONY?**

16 **A.** Yes.
17

Exhibit TPB-1
Southwestern Electric Power Company
2021 Winter Storm - Fuel Impact
Louisiana Retail

	<u>5 Year</u>
Annual kWh at generator	32,619,929,970
Storm Fuel Cost	\$149,501,147
Interest	\$35,249,496
Total Recoverable Cost	\$184,750,643
Avg rate/kWh @ gen	\$0.005664
Secondary loss factor	1.0767
Fuel Factor - secondary voltage	\$0.006098
1000 kwh	1,000
Per month	\$6.10

Southwestern Electric Power Company
Exhibit TPB-1
2021 Winter Storm - Fuel Impact
Louisiana Retail

	<u>5 Year</u>
Annual kWh at generator	32,619,929,970
Storm Fuel Cost	\$149,501,147
Interest	\$35,249,496
Total Recoverable Cost	\$184,750,643
Avg rate/kWh @ gen	\$0.005664
Secondary loss factor	1.0767
Fuel Factor - secondary voltage	\$0.006098
1000 kwh	1,000
Per month	\$6.10

**Southwestern Electric Power Company
2021 Winter Storm - Fuel Impact
Louisiana Retail**

	1 Year	5 Year 5
Annual kWh at generator	6,523,985,994	32,619,929,970
Storm Fuel Cost	\$149,501,147	\$149,501,147
Interest		\$35,249,496
Total Recoverable Cost	\$149,501,147	\$184,750,643
Avg rate/kWh @ gen	\$0.022916	\$0.005664
Secondary loss factor	1.0767	1.0767
Fuel Factor - secondary voltage	\$0.024673	\$0.006098
1000 kwh	1,000	1,000
Per month	\$24.67	\$6.10

**Southwestern Electric Power Company
2021 Winter Storm - Amortization Schedule
Louisiana Retail**

Principal **149,501,147**
Rate **8.67%**
Monthly **0.72%**
Period **5**
Months **60**

Period	Beginning	Interest	Payment	Ending
1	149,501,147	1,079,574	3,079,177	147,501,544
2	147,501,544	1,065,135	3,079,177	145,487,501
3	145,487,501	1,050,591	3,079,177	143,458,915
4	143,458,915	1,035,942	3,079,177	141,415,680
5	141,415,680	1,021,188	3,079,177	139,357,690
6	139,357,690	1,006,327	3,079,177	137,284,839
7	137,284,839	991,358	3,079,177	135,197,020
8	135,197,020	976,282	3,079,177	133,094,124
9	133,094,124	961,096	3,079,177	130,976,043
10	130,976,043	945,801	3,079,177	128,842,667
11	128,842,667	930,396	3,079,177	126,693,885
12	126,693,885	914,879	3,079,177	124,529,587
13	124,529,587	899,250	3,079,177	122,349,659
14	122,349,659	883,509	3,079,177	120,153,991
15	120,153,991	867,653	3,079,177	117,942,466
16	117,942,466	851,683	3,079,177	115,714,973
17	115,714,973	835,598	3,079,177	113,471,393
18	113,471,393	819,397	3,079,177	111,211,613
19	111,211,613	803,079	3,079,177	108,935,514
20	108,935,514	786,643	3,079,177	106,642,980
21	106,642,980	770,088	3,079,177	104,333,890
22	104,333,890	753,413	3,079,177	102,008,126
23	102,008,126	736,619	3,079,177	99,665,568
24	99,665,568	719,703	3,079,177	97,306,093
25	97,306,093	702,665	3,079,177	94,929,580
26	94,929,580	685,503	3,079,177	92,535,906
27	92,535,906	668,218	3,079,177	90,124,947
28	90,124,947	650,808	3,079,177	87,696,578
29	87,696,578	633,273	3,079,177	85,250,673
30	85,250,673	615,610	3,079,177	82,787,106
31	82,787,106	597,820	3,079,177	80,305,749
32	80,305,749	579,902	3,079,177	77,806,473
33	77,806,473	561,854	3,079,177	75,289,150
34	75,289,150	543,676	3,079,177	72,753,649
35	72,753,649	525,367	3,079,177	70,199,839

**Southwestern Electric Power Company
2021 Winter Storm - Amortization Schedule
Louisiana Retail**

Principal 149,501,147
Rate 8.67%
Monthly 0.72%
Period 5
Months 60

Period	Beginning	Interest	Payment	Ending
36	70,199,839	506,925	3,079,177	67,627,587
37	67,627,587	488,351	3,079,177	65,036,760
38	65,036,760	469,642	3,079,177	62,427,225
39	62,427,225	450,798	3,079,177	59,798,845
40	59,798,845	431,818	3,079,177	57,151,486
41	57,151,486	412,701	3,079,177	54,485,010
42	54,485,010	393,446	3,079,177	51,799,278
43	51,799,278	374,052	3,079,177	49,094,153
44	49,094,153	354,518	3,079,177	46,369,493
45	46,369,493	334,842	3,079,177	43,625,158
46	43,625,158	315,025	3,079,177	40,861,005
47	40,861,005	295,065	3,079,177	38,076,893
48	38,076,893	274,960	3,079,177	35,272,675
49	35,272,675	254,710	3,079,177	32,448,208
50	32,448,208	234,314	3,079,177	29,603,345
51	29,603,345	213,771	3,079,177	26,737,938
52	26,737,938	193,079	3,079,177	23,851,840
53	23,851,840	172,238	3,079,177	20,944,901
54	20,944,901	151,247	3,079,177	18,016,971
55	18,016,971	130,104	3,079,177	15,067,897
56	15,067,897	108,808	3,079,177	12,097,528
57	12,097,528	87,358	3,079,177	9,105,709
58	9,105,709	65,754	3,079,177	6,092,285
59	6,092,285	43,993	3,079,177	3,057,102
60	3,057,102	22,076	3,079,177	0
		35,249,496		

Southwestern Electric Power Company
2021 Winter Storm - Cost of Capital
Louisiana Retail (2017 FRP)

**SOUTHWESTERN ELECTRIC POWER COMPANY
LOUISIANA
BENCHMARK RATE OF RETURN ON RATE BASE
Test Year Ending 12/31/17**

LINE NO	DESCRIPTION	CAPITAL AMOUNT (A) (\$)	CAPITAL RATIO (B)	COST RATE (C)	BENCHMARK RATE OF RETURN ON RATE BASE (D)
1	SHORT-TERM DEBT	7,141,530	0.153%	1.280%	0.002%
2	LONG-TERM DEBT	2,453,278,928	52.667%	5.124%	2.699%
3	PREFERRED EQUITY	-	0.000%	0.000%	0.000%
4	COMMON EQUITY	2,197,670,795	47.180%	9.800%	4.624%
5	TOTAL CAPITALIZATION	4,658,091,250	100.000%		7.325%

NOTES:

- (A) All amounts besides Short-term Debt reflect the average beginning/ending year balances. Short-term Debt amounts shall reflect the 13 month average reduced by the monthly amounts utilized by SWEPCO for financing CWIP consistent with the FERC AFUDC rate computations. The Short-term Debt amount shall not be reduced below zero. All Long-term Debt issues shall reflect the balance net of a) unamortized debt discount, premium, and expenses; b) gain or loss on reacquired debt and c) any adjustments required per Attachment C. All Preferred Stock issues shall reflect the balance net of discount, premium and capital stock expense. All Long-Term Debt amounts shall include current maturities.
- (B) Each Capital Amount divided by the Total Capital Amount.
- (C) Annualized cost of Short-Term Debt, Long-Term Debt and Preferred Equity at the end of the test year and includes current maturities. The Long-Term Debt cost rates shall include: a) annualized amortization of debt discount premium, and issuance expense; b) annualized gain or loss on reacquired debt; and c) any adjustments required per Attachment C. The Common Equity Cost Rate shall be the Authorized Rate of Return on Common Equity (AROE) of 10.000%.
- (D) The components of the Benchmark Rate of Return on Rate Base (BRRB) are the corresponding Cost Rates multiplied by the associated Capital Ratios. The BRRB is the sum of the components so determined and expressed as a percent to three decimal places (XX.XXX%).

Rev. Conversion Factor	1.289882
S.T Debt	0.002%
L/T Debt	2.699%
Equity	5.964%
Pre-Tax WACC	8.665%

SOUTHWESTERN ELECTRIC POWER COMPANY LOUISIANA CALCULATED RATE OF RETURN ON COMMON EQUITY FORMULA Test Year Ending 12/31/17		
LINE NO	DESCRIPTION	ADJUSTED AMOUNT
LPSC RETAIL		
1	RATE BASE (Attachment B, Page 2, L15)	1,716,536,315
2	BENCHMARK RATE OF RETURN ON RATE BASE (Attachment D, L5, Column D)	7.325%
3	REQUIRED OPERATING INCOME (L1 * L2)	125,736,285
4	NET UTILITY OPERATING INCOME (Attachment B, Page 3, L30)	103,884,976
5	OPERATING INCOME DEFICIENCY/EXCESS (L3 - L4)	22,071,309
6	REVENUE CONVERSION FACTOR (A)	1.2698616
7	REVENUE DEFICIENCY/EXCESS (L5 * L6)	28,489,375
7a	GENERATION DEPRECIATION REDUCTION DEFERRAL	-
7b	ADJUSTED REVENUE DEFICIENCY / (EXCESS)	28,489,375
PRESENT RATE REVENUES		
8	ULTIMATE CUSTOMERS (Attachment B, Page 3, L1)	360,522,403
9	REVENUE REQUIREMENT (L7b + L8)	408,991,778
10	COMMON EQUITY DEFICIENCY/EXCESS (%) ((L7+7a) / L6 / L1)	1.268%
11	WEIGHTED TEST YEAR RATE OF RETURN ON COMMON EQUITY (%) (Attachment D, L4, Column D)	4.624%
12	WEIGHTED CALCULATED COMMON EQUITY RATE (%) (L11 - L10)	3.338%
13	COMMON EQUITY RATIO (%) (Attachment D, L4, Column B)	47.160%
14	CALCULATED RATE OF RETURN ON COMMON EQUITY % (L12 / L13)	7.076%

NOTE:

- (A) REVENUE CONVERSION FACTOR = $1 / [(1 - \text{COMPOSITE TAX RATE}) * (1 - \text{FACTORING RATE}) * (1 - \text{FRANCHISE TAX RATE})]$
(B) REVENUE CONVERSION FACTOR EXCLUDES STATE INCOME TAX EXPENSE DUE TO STATE NET OPERATING LOSS CARRY-FORWARD

Composite Rate (B)	21.000000%
Factoring Rate	0.405906%
Franchise Tax Rate	1.465237%
Federal Rate	21.000000%
State Rate	3.080800%
	23.433632%

Formula Rate Plan Rider Schedule FRP, Attachment B

**Southwestern Electric Power Company
2021 Winter Storm - Fuel Costs**

SOAH Docket No. 473-21-3114
PUC Docket 52397
CARDS 1st RFI Q. #1-7
Attachment 2
Page 22 of 24

Items	Dates covered	Received	Pmt Date	SWEPCo
Payments				
Net SPP Invoice - RT/DA	Feb 9-16	2/24/21	3/3/21	\$ 27.56
Net SPP Invoice - RT/DA	Feb 17-20	3/3/21	3/10/21	87.08
Total SPP Invoices			Total Energy	<u>\$ 114.64</u>
Gas	Feb 9-20	3/10 - 3/15/2021	3/25/21	\$ 325.47
Impact of Feb. 9-20 purchases in subsequent period	Feb 21-28			43.38
			Total Gas	<u>\$ 368.85</u>
			Total Energy and Gas	<u><u>\$ 483.49</u></u>

Turk Merch Share Impact	Revised SWP
10.1 \$	37.66
10.2 \$	97.28
20.3 \$	134.94

SPP Cold Weather Event Calculation

Items	SWEPCo In Millions	SWEPCo In Millions	
February 2021 - Est. Cycle - SWEPCo			
SPP RTO charges	\$ 114.98	\$ 135.28	Includes - Feb 1-23 RT / 24-28 DA and Estimated RT for 24-28
Gas Invoices - multiple	\$ 377.99	\$ 377.99	
Total Energy and Gas	<u>\$ 492.97</u>	<u>\$ 513.27</u>	

**Southwestern Electric Power Company
2021 Winter Storm - Deferral Calculation**

		Fuel Costs
	SPP	134.9
	Gas	368.9
Storm Event- Actual Invoices Rec. to Date		503.8
	SPP	135.3
	Gas	378.0
Full Month- February 2021 Est. Cycle		513.3
	SPP	0.3
	Gas	9.1
Difference- Non-Storm Days		9.5
	SPP	0.5
	Gas	0.2
Per Day Cost- 2020 Daily Average		0.7
	SPP	5.7
	Gas	3.0
12 Days- Storm Event Normalized Cost		8.7

Incremental Deferral	SPP	129.2
	Gas	365.9
		495.1

SWEPCO Jurisdictional Amounts

Allocation Factor	0.190484278	0.316872398	0.338875381	0.156456044
	AR	LA	TX	FERC
Incremental Deferral	94,311,243	156,887,645	167,781,608	77,463,422
Arkansas Adjustment (Turk)	18,932,990	(7,386,498)	(7,899,401)	(3,647,090)
Total Deferral	113,244,233	149,501,147	159,882,206	73,816,331

Southwestern Electric Power Company
Normalized Fuel Calculation - 2020 Average

	2020 SPP Eligible Purchases (In millions)	2020 Gas Purchases (In millions)
Jan	16.0	6.5
Feb	14.2	6.7
Mar	15.4	5.8
Apr	12.9	6.5
May	19.5	4.3
Jun	9.9	7.9
Jul	16.2	11.0
Aug	13.7	11.5
Sep	15.6	7.0
Oct	19.2	6.5
Nov	9.5	8.7
Dec	11.4	8.7
Total 2020	173.5	91.1
2020 Cost Per Day	0.5	0.2
28 days (February 2021 Normalized Cost)	13.27	6.97
2020 SWEPCO Normalized Costs Per Day- SPP and Gas	20.24	

Arkansas Adjustment (Turk)

Jan	156,173
Feb	104,452
Mar	140,000
Apr	(23,563)
May	(38,673)
Jun	105,527
Jul	297,316
Aug	458,541
Sep	151,105
Oct	535,021
Nov	590,464
Dec	574,289
Total	3,050,652
Avg / Mth	254,221

Current Calculation (Turk)

AR	LA	TX	FERC
19,187,210.66	(7,485,679.44)	(8,005,469.98)	(3,696,061.24)

% for Deferral Calc

0.39014

0.41723

0.19263

**SOAH DOCKET NO. 473-21-3114
PUC DOCKET NO. 52397**

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

Question No. CARD 1-8:

Please provide SWEPCO's Freeze Protection Plan ("FPP") that was in effect for each SWEPCO power plant and for Dolet Hills during the 2021 Winter Storm event.

Response No. CARD 1-8:

SWEPCO filed an objection to this RFI on September 3, 2021.

**SOAH DOCKET NO. 473-21-3114
PUC DOCKET NO. 52397**

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

Question No. CARD 1-9:

Please provide SWEPCO's total capital and O&M costs for the FPP for each of the last three years and for 2021 to date.

Response No. CARD 1-9:

SWEPCO filed an objection to this RFI on September 3, 2021.

**SOAH DOCKET NO. 473-21-3114
PUC DOCKET NO. 52397**

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

Question No. CARD 1-10:

Please provide the FPP work check lists for each plant along with documentation showing which work activities were performed in preparation for and during the 2021 Winter Storm event.

Response No. CARD 1-10:

SWEPCO filed an objection to this RFI on September 3, 2021.

**SOAH DOCKET NO. 473-21-3114
PUC DOCKET NO. 52397**

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

Question No. CARD 1-11:

Please discuss all actions taken by SWEPCO to mitigate costs impacts of the 2021 Winter Storm event.

Response No. CARD 1-11:

CARD has agreed to withdraw this request.

**SOAH DOCKET NO. 473-21-3114
PUC DOCKET NO. 52397**

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

Question No. CARD 1-12:

Please provide SWEPCO's fuel procurement strategy and plan for 2021 that was in effect immediately before and during the 2021 Winter Storm Event.

Response No. CARD 1-12:

CARD has agreed to withdraw this request.

**SOAH DOCKET NO. 473-21-3114
PUC DOCKET NO. 52397**

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

Question No. CARD 1-13:

Please provide the total volume and average price (\$/MMBtu) of SWEPCO's natural gas purchases for each of the last three calendar years and for each month of 2021 to date.

Response No. CARD 1-13:

Please refer to CARD 1-13 Attachment 1.

Prepared By: Michael H. Ward

Title: Regulatory Consultant Staff

Prepared By: Anthony J. Bender

Title: Energy Settlements Mgr

Prepared By: Joyce A. White

Title: Accountant Prin

Sponsored By: Tiffany A. Powell Day

Title: Regulatory Acctg Case Mgr

NG Purchases		
Year-Month	Volume (MMBtu)	Average Price (\$/MMBtu)
2018	30,757,513	\$2.99
2019	32,736,277	\$2.36
2020	37,312,405	\$1.98
2021 Jan	2,685,503	\$2.54
2021 Feb	3,353,461	\$112.88
2021 Mar	1,853,845	\$2.52
2021 Apr	2,496,007	\$2.67
2021 May	3,214,153	\$2.73
2021 Jun	3,648,089	\$3.06
2021 Jul	4,424,367	\$3.63

SOAH DOCKET NO. 473-21-3114
PUC DOCKET NO. 52397

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

Question No. CARD 1-14:

Please provide the total volume and average price (\$/MMBtu) of SWEPCO's natural gas purchases for each day of the 2021 Winter Storm Event.

Response No. CARD 1-14:

Please refer to CARD 1-14 Attachment 1.

Prepared By: Jason M. Stegall

Title: Reg Pricing & Analysis Mgr

Prepared By: Scott E. Mertz

Title: Regulatory Consultant Staff

Prepared By: Michael H. Ward

Title: Regulatory Consultant Staff

Prepared By: Anthony J. Bender

Title: Energy Settlements Mgr

Prepared By: Clinton M. Stutler

Title: Natural Gas & Fuel Oil Mgr

Sponsored By: Tiffany A. Powell Day

Title: Regulatory Acctg Case Mgr

NG Purchases Winter Storm Event		
Day	Volume (MMBtu)	Average Price (\$/MMBtu)
2/9/2021	147,211	\$ 3.34
2/10/2021	193,205	\$ 3.90
2/11/2021	216,213	\$ 6.47
2/12/2021	243,263	\$ 29.53
2/13/2021	263,841	\$ 252.26
2/14/2021	249,507	\$ 244.54
2/15/2021	271,405	\$ 253.14
2/16/2021	206,692	\$ 276.95
2/17/2021	218,276	\$ 225.79
2/18/2021	198,227	\$ 283.45
2/19/2021	252,148	\$ 26.98
2/20/2021	35,589	\$ 3.89

**SOAH DOCKET NO. 473-21-3114
PUC DOCKET NO. 52397**

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

Question No. CARD 1-15:

Please provide the total volume and average price (\$/MMBtu) of SWEPCO's natural gas purchases that were supplied under contracts with market index-based pricing for each of the last three calendar years and for each month of 2021 to date.

Response No. CARD 1-15:

Please refer to CARD 1-15 Attachment 1.

Prepared By: Jason M. Stegall

Title: Reg Pricing & Analysis Mgr

Prepared By: Scott E. Mertz

Title: Regulatory Consultant Staff

Prepared By: Michael H. Ward

Title: Regulatory Consultant Staff

Prepared By: Anthony J. Bender

Title: Energy Settlements Mgr

Prepared By: Clinton M. Stutler

Title: Natural Gas & Fuel Oil Mgr

Sponsored By: Tiffany A. Powell Day

Title: Regulatory Acctg Case Mgr

Index NG Purchases		
Year-Month	Volume (MMBtu)	Average Price (\$/MMBtu)
2018	22,063,216	\$2.95
2019	21,246,026	\$2.33
2020	27,951,908	\$1.89
2021 Jan	2,047,393	\$2.49
2021 Feb	2,440,708	\$149.35
2021 Mar	1,172,000	\$2.47
2021 Apr	1,535,375	\$2.61
2021 May	2,527,193	\$2.71
2021 Jun	2,358,663	\$3.05
2021 Jul	2,813,812	\$3.61

SOAH DOCKET NO. 473-21-3114
PUC DOCKET NO. 52397

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

Question No. CARD 1-16:

Please provide the total volume and average price (\$/MMBtu) of SWEPCO's natural gas purchases that were supplied under contracts with fixed pricing for each of the last three calendar years and for each month of 2021 to date.

Response No. CARD 1-16:

Please refer to CARD 1-16 Attachment 1.

Prepared By: Jason M. Stegall

Title: Reg Pricing & Analysis Mgr

Prepared By: Scott E. Mertz

Title: Regulatory Consultant Staff

Prepared By: Michael H. Ward

Title: Regulatory Consultant Staff

Prepared By: Anthony J. Bender

Title: Energy Settlements Mgr

Prepared By: Clinton M. Stutler

Title: Natural Gas & Fuel Oil Mgr

Sponsored By: Tiffany A. Powell Day

Title: Regulatory Acctg Case Mgr

Fixed Price NG Purchases		
Year-Month	Volume (MMBtu)	Average Price (\$/MMBtu)
2018	8,694,297	\$3.09
2019	11,490,251	\$2.41
2020	9,360,497	\$2.27
2021 Jan	638,110	\$2.72
2021 Feb	912,753	\$15.38
2021 Mar	681,845	\$2.60
2021 Apr	960,632	\$2.77
2021 May	686,960	\$2.83
2021 Jun	1,289,426	\$3.08
2021 Jul	1,610,555	\$3.66

**SOAH DOCKET NO. 473-21-3114
PUC DOCKET NO. 52397**

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

Question No. CARD 1-17:

Please provide the total volume and average price (\$/MMBtu) of SWEPCO's natural gas purchases that were supplied under contracts with fixed pricing, and having a term of one week or more, for each of the last three calendar years and for each month of 2021 to date.

Response No. CARD 1-17:

Please refer to CARD 1-17 Attachment 1.

Prepared By: Jason M. Stegall

Title: Reg Pricing & Analysis Mgr

Prepared By: Scott E. Mertz

Title: Regulatory Consultant Staff

Prepared By: Michael H. Ward

Title: Regulatory Consultant Staff

Prepared By: Anthony J. Bender

Title: Energy Settlements Mgr

Prepared By: Clinton M. Stutler

Title: Natural Gas & Fuel Oil Mgr

Sponsored By: Tiffany A. Powell Day

Title: Regulatory Acctg Case Mgr

Fixed NG Purchases (Term > 1 Week)		
Year-Month	Volume (MMBtu)	Average Price (\$/MMBtu)
2018	2,730,102	\$2.63
2019	3,638,637	\$2.63
2020	3,660,000	\$2.63
2021 Jan	310,000	\$2.63
2021 Feb	271,265	\$2.63
2021 Mar	310,000	\$2.63
2021 Apr	300,000	\$2.63
2021 May	310,000	\$2.63
2021 Jun	600,000	\$2.68
2021 Jul	310,000	\$2.63

**SOAH DOCKET NO. 473-21-3114
PUC DOCKET NO. 52397**

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

Question No. CARD 1-18:

Please provide the total volume and average price (\$/MMBtu) of SWEPCO's natural gas purchases during the 2021 Winter Storm event that were supplied under contracts with fixed pricing, and having a term of one week or more.

Response No. CARD 1-18:

During the 12 days of the Winter Storm Event from February 9, 2021 through February 20, 2021, 111,265 MMBtus were purchased at a price of \$2.63/MMBtu under fixed-price contracts with a term of longer than 1 week.

Prepared By: Jason M. Stegall

Title: Reg Pricing & Analysis Mgr

Prepared By: Scott E. Mertz

Title: Regulatory Consultant Staff

Prepared By: Michael H. Ward

Title: Regulatory Consultant Staff

Prepared By: Anthony J. Bender

Title: Energy Settlements Mgr

Prepared By: Clinton M. Stutler

Title: Natural Gas & Fuel Oil Mgr

Sponsored By: Tiffany A. Powell Day

Title: Regulatory Acctg Case Mgr

**SOAH DOCKET NO. 473-21-3114
PUC DOCKET NO. 52397**

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

Question No. CARD 1-19:

Please provide SWEPCO's largest three fuel factor monthly over- or under-recoveries excluding the 2021 Winter Storm event, along with the month, year and primary cause of such past extraordinary recoveries.

Response No. CARD 1-19:

Pursuant to an agreement with CARD, SWEPCO's response to this question is limited to the period from 2015 through the present.

SWEPCO's Texas three largest fuel factor Monthly over/under recoveries, excluding February 2021, are as follows:

- July 2021 - \$8,786,748 under-recovered - Primarily due to increased lignite costs.
- February 2019 - \$5,485,543 over-recovered - Primarily due to a correction in gas expense. The adjustment made year-to-date gas expense correct, however, February expense was understated.
- October 2019 - \$4,652,610 over-recovered - Primarily due to lower purchased power and generation expenses.

Prepared By: Joyce A. White

Title: Accountant Prin

Sponsored By: Tiffany A. Powell Day

Title: Regulatory Acctg Case Mgr

**SOAH DOCKET NO. 473-21-3114
PUC DOCKET NO. 52397**

**SOUTHWESTERN ELECTRIC POWER COMPANY'S RESPONSE TO CITIES
ADVOCATING REASONABLE DEREGULATION'S FIRST SET OF REQUESTS FOR
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Question No. CARD 1-20:

Please provide interest rates applicable to SWEPCO's Texas Retail fuel factor recovery balances since January of 2020.

Response No. CARD 1-20:

The interest rates applicable to SWEPCO's Texas Retail Fuel factor recovery balances are based on Commission orders issued in PUCT Project No. 45319:

2021 - 0.82% or 0.0680779% monthly

2020 - 2.35% or 0.1937552% monthly

Please refer to CARD 1-20 Attachments 1 and 2 for the Commission's orders establishing the above interest rates.

Prepared By: Joyce A. White

Title: Accountant Prin

Sponsored By: Tiffany A. Powell Day

Title: Regulatory Acctg Case Mgr

PROJECT NO. 45319

**SETTING INTEREST RATES FOR
CALENDAR YEAR 2021**

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§

**PUBLIC UTILITY COMMISSION
OF TEXAS**

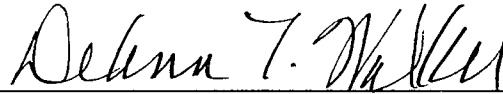
ORDER

This Order establishes the interest rate for deposits held by utilities for calendar year 2021 as required by section 183.003 of the Texas Utilities Code. This Order also establishes the interest rate for overbillings and certain underbillings by a utility for calendar-year 2021 as required by 16 Texas Admin. Code § 25.28(c) and (d), § 25.480(d) and (e), and § 26.27(a)(3) and (b)(4). The Commission orders the following:

1. The interest rate for calendar-year 2021 on deposits held by utilities is set at 0.61 percent.
2. The interest rate for calendar-year 2021 for overbillings and certain underbillings by a utility is set at 0.82 percent.

Signed at Austin, Texas the 10th day of November 2020.

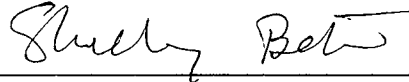
PUBLIC UTILITY COMMISSION OF TEXAS



DEANN T. WALKER, CHAIRMAN



ARTHUR C. D'ANDREA, COMMISSIONER



SHELLY BOTKIN, COMMISSIONER

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PROJECT NO. 45319

**SETTING INTEREST RATES FOR
CALENDAR YEAR 2020**

**§ PUBLIC UTILITY COMMISSION
§ OF TEXAS**

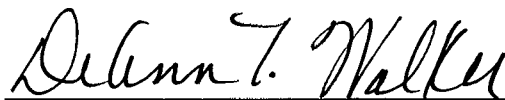
ORDER

This Order establishes the interest rate for deposits held by utilities for calendar year 2020 as required by section 183.003 of the Texas Utilities Code. This Order also establishes the interest rate for overbillings and certain underbillings by a utility for calendar-year 2020 as required by 16 Texas Admin. Code § 25.28(c) and (d), § 25.480(d) and (e), and § 26.27(a)(3) and (b)(4). The Commission orders the following:


1. The interest rate for calendar-year 2020 on deposits held by utilities is set at 2.21 percent.
2. The interest rate for calendar-year 2020 for overbillings and certain underbillings by a utility is set at 2.35 percent.

SIGNED AT AUSTIN, TEXAS the 15th day of November 2019.

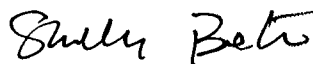
PUBLIC UTILITY COMMISSION OF TEXAS



DEANN T. WALKER, CHAIRMAN



ARTHUR C. D'ANDREA, COMMISSIONER



SHELLY BOTKIN, COMMISSIONER

SOAH DOCKET NO. 473-21-3114
PUC DOCKET NO. 52397

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

Question No. CARD 1-21:

Please provide the forecasted monthly MWh, monthly fuel/energy cost (\$), and monthly average fuel/energy cost (\$/MWh) for each SWEPCO generating unit and purchased power resource for each month of 2021, as reflected in the forecast supporting SWEPCO's current fuel factor charges in Texas.

Response No. CARD 1-21:

Please refer to CARD 1-21 HIGHLY SENSITIVE Attachments 1 and 2 for requested forecast data. Please note the Company is providing requested forecast data, which was not developed in support of SWEPCO's current fuel factor.

The attachment responsive to this request is HIGHLY SENSITIVE under the terms of the Protective Order. The HIGHLY SENSITIVE information is available for review at the Austin offices of American Electric Power Company (AEP), 400 West 15th Street, Suite 1520, Austin, Texas, 78701, (512) 481-4562, during normal business hours.

Prepared By: Thomas W. Freeman

Title: Resource Planning Analyst Staff

Prepared By: Joyce A. White

Title: Accountant Prin

Sponsored By: Tiffany A. Powell Day

Title: Regulatory Acctg Case Mgr

**SOAH DOCKET NO. 473-21-3114
PUC DOCKET NO. 52397**

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

Question No. CARD 1-22:

Please provide the actual monthly MWh, monthly fuel/energy cost (\$), and monthly average fuel/energy cost (\$/MWh), for each SWEPCO generating unit and purchased power resource for the month of 2021.

Response No. CARD 1-22:

Please refer to CARD 1-22 HIGHLY SENSITIVE Attachments 1 and 2 for the requested information.

The attachment responsive to this request is HIGHLY SENSITIVE under the terms of the Protective Order. The HIGHLY SENSITIVE information is available for review at the Austin offices of American Electric Power Company (AEP), 400 West 15th Street, Suite 1520, Austin, Texas, 78701, (512) 481-4562, during normal business hours.

Prepared By: Joyce A. White

Title: Accountant Prin

Sponsored By: Tiffany A. Powell Day

Title: Regulatory Acctg Case Mgr

**SOAH DOCKET NO. 473-21-3114
PUC DOCKET NO. 52397**

**SOUTHWESTERN ELECTRIC POWER COMPANY'S RESPONSE TO CITIES
ADVOCATING REASONABLE DEREGULATION'S FIRST SET OF REQUESTS FOR
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Question No. CARD 1-23:

Please provide the actual MWh, fuel/energy cost (\$), and average fuel/energy cost (\$/MWh), for each SWEPCO generating unit and purchased power resource for each day and the total of the February 2021 Winter Storm event.

Response No. CARD 1-23:

Please refer to CARD 1-23 HIGHLY SENSITIVE Attachments 1 through 3 for the requested information.

The attachment responsive to this request is HIGHLY SENSITIVE under the terms of the Protective Order. The HIGHLY SENSITIVE information is available for review at the Austin offices of American Electric Power Company (AEP), 400 West 15th Street, Suite 1520, Austin, Texas, 78701, (512) 481-4562, during normal business hours.

Prepared By: Joyce A. White

Title: Accountant Prin

Sponsored By: Tiffany A. Powell Day

Title: Regulatory Acctg Case Mgr

**SOAH DOCKET NO. 473-21-3114
PUC DOCKET NO. 52397**

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

Question No. CARD 1-24:

Please provide SWEPCO's forecasted system average price of natural gas (\$/MMBtu) for each month of 2021 as reflected in the Company's forecast supporting SWEPCO's Texas retail fuel factor charges.

Response No. CARD 1-24:

Please refer to CARD 1-24 HIGHLY SENSITIVE Attachment 1 for the requested information. Please note the Company is providing requested forecast data, which was not used to support the current fuel factor.

The attachment responsive to this request is HIGHLY SENSITIVE under the terms of the Protective Order. The HIGHLY SENSITIVE information is available for review at the Austin offices of American Electric Power Company (AEP), 400 West 15th Street, Suite 1520, Austin, Texas, 78701, (512) 481-4562, during normal business hours.

Prepared By: Thomas W. Freeman

Title: Resource Planning Analyst Staff

Prepared By: Joyce A. White

Title: Accountant Prin

Sponsored By: Tiffany A. Powell Day

Title: Regulatory Acctg Case Mgr

**SOAH DOCKET NO. 473-21-3114
PUC DOCKET NO. 52397**

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

Question No. CARD 1-25:

Please provide SWEPCO's actual system average price of natural gas (\$/MMBtu) for each month of 2021 to date.

Response No. CARD 1-25:

Please see the response to CARD 1-13.

Prepared By: Joyce A. White

Title: Accountant Prin

Sponsored By: Tiffany A. Powell Day

Title: Regulatory Acctg Case Mgr

**SOAH DOCKET NO. 473-21-3114
PUC DOCKET NO. 52397**

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

Question No. CARD 1-26:

Please provide SWEPCO's 2021 planned outage schedule (scheduled start date and end date) for each SWEPCO generating unit which was in effect as of January 31, 2021.

Response No. CARD 1-26:

SWEPCO filed an objection to this RFI on September 3, 2021.

**SOAH DOCKET NO. 473-21-3114
PUC DOCKET NO. 52397**

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

Question No. CARD 1-27:

Please provide the actual start date and end date of planned outages for each SWEPCO generating unit in 2021 to date.

Response No. CARD 1-27:

SWEPCO filed an objection to this RFI on September 3, 2021.

**SOAH DOCKET NO. 473-21-3114
PUC DOCKET NO. 52397**

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

Question No. CARD 1-28:

Please provide the actual start date and end date, the outage cause description, and associated MWh unavailable for each forced outage or derating at each SWEPCO generating (including Dolet Hills) during 2021 to date.

Response No. CARD 1-28:

SWEPCO filed an objection to this RFI on September 3, 2021.

**SOAH DOCKET NO. 473-21-3114
PUC DOCKET NO. 52397**

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

Question No. CARD 1-29:

Please provide the total revenues net of fuel costs associated with SWEPCO's merchant share of the Turk coal plant during each month since January of 2020 and explain how those revenues were treated for ratemaking purposes in Texas and each other jurisdiction served by SWEPCO.

Response No. CARD 1-29:

SWEPCO filed an objection to this RFI on September 3, 2021.

**SOAH DOCKET NO. 473-21-3114
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**SOUTHWESTERN ELECTRIC POWER COMPANY'S RESPONSE TO CITIES
ADVOCATING REASONABLE DEREGULATION'S FIRST SET OF REQUESTS FOR
INFORMATION TO SOUTHWESTERN ELECTRIC POWER COMPANY**

Question No. CARD 1-30:

Please provide the total revenues net of fuel costs associated with SWEPCO's merchant share of the energy (MWh) produced from the Turk coal plant for each day of the 2021 Winter Storm event, and explain how those revenues were treated for ratemaking purposes in Texas and each other jurisdiction served by SWEPCO.

Response No. CARD 1-30:

SWEPCO filed an objection to this RFI on September 3, 2021.

**SOAH DOCKET NO. 473-21-3114
PUC DOCKET NO. 52397**

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

Question No. CARD 1-31:

Please provide a copy of each SWEPCO partial requirements wholesale power sale contract that was in effect during February of 2021.

Response No. CARD 1-31:

SWEPCO filed an objection to this RFI on September 3, 2021.

**SOAH DOCKET NO. 473-21-3114
PUC DOCKET NO. 52397**

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

Question No. CARD 1-32:

Please provide the MWh sales and associated energy charges (\$ and \$/MWh) supplied by SWEPCO under each partial requirements wholesale power sale contract that was in effect during February of 2021.

Response No. CARD 1-32:

SWEPCO filed an objection to this RFI on September 3, 2021.

**SOAH DOCKET NO. 473-21-3114
PUC DOCKET NO. 52397**

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

Question No. CARD 1-33:

Please provide the portion of SWEPCO's total extraordinary costs of the 2021 Winter Storm event that are allocated to each SWEPCO jurisdiction and to each wholesale partial requirements contract.

Response No. CARD 1-33:

The portion of SWEPCO's total costs associated with the 2021 Winter Storm event that are allocated to each SWEPCO jurisdiction were provided in Exhibit TAD-2 page 2, which is available as a native file via the Commission Interchange. Wholesale customers received their ratable share of the fuel costs incurred during the 2021 Winter Storm event as described and defined in each wholesale FERC filed rate schedule. Wholesale invoices do not separately identify the 2021 Winter Storm event and SWEPCO has not performed calculations to segregate the invoices between storm costs and non-storm costs.

Prepared By: Joyce A. White

Title: Accountant Prin

Sponsored By: Tiffany A. Powell Day

Title: Regulatory Acctg Case Mgr

**SOAH DOCKET NO. 473-21-3114
PUC DOCKET NO. 52397**

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

Question No. CARD 1-34:

Please provide SWEPCO's total monthly energy supply (MWh) by primary fuel or energy resource type (e.g., gas-fired generation, coal-fired generation, lignite-fired generation, wind energy, SPP IM market purchases, other) for each month from January of 2020 through the most recent month in 2021.

Response No. CARD 1-34:

Please see CARD 1-34 Attachment 1 for the requested information.

Prepared By: Joyce A. White

Title: Accountant Prin

Sponsored By: Tiffany A. Powell Day

Title: Regulatory Acctg Case Mgr

**SOAH DOCKET NO. 473-21-3114
PUC DOCKET NO. 52397**

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

Question No. CARD 1-35:

Please provide SWEPCO's energy sales (MWh) and associated revenues (\$ and \$/MWh) for sales into the SPP market for each month from January of 2020 through the most recent month of 2021 for which information is available, and please update this response as results for future months become available.

Response No. CARD 1-35:

Please see CARD 1-35 HIGHLY SENSITIVE Attachment 1 for SWEPCO's energy sales (MWh) and associated revenues (\$ and \$/MWh) for sales into the SPP market for January 2020 to August 2021.

The attachment responsive to this request is HIGHLY SENSITIVE under the terms of the Protective Order. The HIGHLY SENSITIVE information is available for review at the Austin offices of American Electric Power Company (AEP), 400 West 15th Street, Suite 1520, Austin, Texas, 78701, (512) 481-4562, during normal business hours.

Prepared By: Joyce A. White

Title: Accountant Prin

Sponsored By: Tiffany A. Powell Day

Title: Regulatory Acctg Case Mgr

**SOAH DOCKET NO. 473-21-3114
PUC DOCKET NO. 52397**

**SOUTHWESTERN ELECTRIC POWER COMPANY'S RESPONSE TO CITIES
ADVOCATING REASONABLE DEREGULATION'S FIRST SET OF REQUESTS FOR
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Question No. CARD 1-36:

Please provide SWEPCO's energy purchases (MWh) and associated energy costs (\$ and \$/MWh) for energy purchased from the SPP market for each month from January of 2020 through the most recent month of 2021, and please update this response as results for future months become available.

Response No. CARD 1-36:

Please see CARD 1-36 Attachment 1 for the energy purchases and associated energy costs for energy purchased from the SPP market for January 2020 through July 2021.

Prepared By: Joyce A. White

Title: Accountant Prin

Sponsored By: Tiffany A. Powell Day

Title: Regulatory Acctg Case Mgr

**SOAH DOCKET NO. 473-21-3114
PUC DOCKET NO. 52397**

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

Question No. CARD 1-37:

Please provide SWEPCO's off-system sales (MWh), and associated energy revenues and energy margins for each month from January of 2020 through the most recent month of 2021, and please update this response as results for future months become available.

Response No. CARD 1-37:

Please see CARD 1-37 Attachment 1 (OSS Margins).xlsx for off-system sales margins through July 31, 2021, the most recent date available. Please see "KWH Pivot" tab for MWh data.

Prepared By: Joyce A. White

Title: Accountant Prin

Sponsored By: Tiffany A. Powell Day

Title: Regulatory Acctg Case Mgr

**SOAH DOCKET NO. 473-21-3114
PUC DOCKET NO. 52397**

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

Question No. CARD 1-38:

Please provide SWEPCO's retained share of off-system sales margins for each month from January of 2020 through the most recent month of 2021, and please update this response as results for future months become available.

Response No. CARD 1-38:

Please refer to the response to CARD 1-37.

Prepared By: Joyce A. White

Title: Accountant Prin

Sponsored By: Tiffany A. Powell Day

Title: Regulatory Acctg Case Mgr

**SOAH DOCKET NO. 473-21-3114
PUC DOCKET NO. 52397**

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

Question No. CARD 1-39:

Please indicate whether the revenues used for calculating monthly over- and under-recoveries of Texas retail fuel factor costs are based on the actual energy sales occurring in the month, or the billed energy sales for the month, or some other value. If it represents some other value, please describe.

Response No. CARD 1-39:

The revenues used for calculating monthly over- and under-recoveries of Texas retail fuel factor costs are based on billed energy sales for the month.

Prepared By: Joyce A. White

Title: Accountant Prin

Sponsored By: Tiffany A. Powell Day

Title: Regulatory Acctg Case Mgr

**SOAH DOCKET NO. 473-21-3114
PUC DOCKET NO. 52397**

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

Question No. CARD 1-40:

Please identify the specific provisions of SWEPCO's fuel factor tariff, fuel rules or Commission orders that define the basis for monthly revenues to be used for calculating monthly fuel factor over- and under-recoveries (i.e., revenues from actual sales in the month, revenues from sales billed in the month, or some other factor).

Response No. CARD 1-40:

SWEPCO follows 16 Tex. Admin. Code (TAC) § 25.237 - Fuel Factors to determine the monthly revenues to be used for calculating monthly fuel factor over- and under-recoveries. Please see also the response to CARD 1-39.

Prepared By: Joyce A. White

Title: Accountant Prin

Sponsored By: Tiffany A. Powell Day

Title: Regulatory Acctg Case Mgr

**SOAH DOCKET NO. 473-21-3114
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**SOUTHWESTERN ELECTRIC POWER COMPANY'S RESPONSE TO CITIES
ADVOCATING REASONABLE DEREGULATION'S FIRST SET OF REQUESTS FOR
INFORMATION TO SOUTHWESTERN ELECTRIC POWER COMPANY**

Question No. CARD 1-41:

Please explain how monthly over- and under-recoveries of fuel factor expenses are allocated to SWEPCO's customers served at different voltage levels for purpose of calculating the monthly Texas retail fuel factor over- or under-recoveries.

Response No. CARD 1-41:

The total over/under recovery amount has been allocated in accordance with 16 TAC § 25.236(e) to each of the retail rate classes. The over/under recovery was allocated to rate class and voltage level based on the proportionate share of total kWh sales booked in each month of the historical period, adjusted for losses. See EXHIBIT SBM - 2 through EXHIBIT SBM-5. Seasonal Agricultural customers and customers served at transmission voltage were allocated over/under recoveries based on each customer's actual monthly kwh, adjusted for losses. Following the long-standing practice, a good cause exception was requested to allocate over/under recoveries to customers served under the Large Lighting and Power Service tariff at substation voltage in the same manner as customers served at transmission voltage.

Prepared By: Joyce A. White

Title: Accountant Prin

Sponsored By: Sonia B. Morgan

Title: Rates Mgr

Sponsored By: Tiffany A. Powell Day

Title: Regulatory Acctg Case Mgr

**SOAH DOCKET NO. 473-21-3114
PUC DOCKET NO. 52397**

**SOUTHWESTERN ELECTRIC POWER COMPANY'S RESPONSE TO CITIES
ADVOCATING REASONABLE DEREGULATION'S FIRST SET OF REQUESTS FOR
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Question No. CARD 1-42:

Please explain in detail how SWEPCO proposes to allocate extraordinary costs of the 2021 Winter Storm event to each customer class and provide workpapers supporting this proposed allocation.

Response No. CARD 1-42:

SWEPCO's requested surcharge in this case is not limited to its eligible fuel costs incurred during the 2021 Winter Storm event. Rather, SWEPCO's proposed surcharge seeks to recover the Company's adjusted Texas retail jurisdictional fuel under-recovered balance through June 30, 2021, which includes eligible fuel costs associated with the 2021 Winter Storm event. Accordingly, SWEPCO is not proposing to separately allocate the costs of the 2021 Winter Storm event to customer classes. SWEPCO witness Sonia B. Morgan explains in her direct testimony how SWEPCO proposes to allocate the proposed surcharge amount amongst the customer classes. See also EXHIBIT SBM-2 through EXHIBIT SBM-5.

Prepared By: Joyce A. White

Title: Accountant Prin

Sponsored By: Sonia B. Morgan

Title: Rates Mgr

Sponsored By: Tiffany A. Powell Day

Title: Regulatory Acctg Case Mgr

**SOAH DOCKET NO. 473-21-3114
PUC DOCKET NO. 52397**

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

Question No. CARD 1-43:

Please provide documentation of notices provided by SPP to SWEPCO prior to the start of the 2021 Winter Storm event.

Response No. CARD 1-43:

Please see CARD 1-43 Attachment 1 for a summary prepared by SPP regarding its notices prior to and during the 2021 Winter Storm event.

Prepared By: Christopher N. Martel

Title: Regulatory Consultant Sr

Prepared By: Lynn M. Ferry-Nelson

Title: Dir Regulatory Svcs

Sponsored By: Thomas P. Brice

Title: VP Regulatory & Finance

SPP BALANCING AUTHORITY OPERATIONS: FEB. 4-20, 2021

Thurs. 2/4 to Mon. 2/8	Tues 2/9 to Sat 2/13	Sun. 2/14	Mon. 2/15	Tues. 2/16	Wed. 2/17	Thurs. 2/18	Fri. 2/19	Sat. 2/20	
Normal operations in effect	Tues. 2/9: Declared conservative operations until further notice Thurs. 2/11: Committed longer-lead time generating resources for Sat. 2/13 to Tues. 2/16 Sat. 2/13: Reminded market participants of emergency cap & offer processes	Requested member companies issue public appeals for conservation	Conservative operations in effect	EEA2 in effect	EEA 2 in effect	EEA1 in effect	EEA1 in effect	Conservative operations in effect	
Thurs. 2/4: Issued cold weather alert to grid operators			05:00 Declared EEA1	06:15 Declared EEA3					
			07:22 Declared EEA2	06:46 Directed interruptions		09:30 Ended EEA and declared conservative operations through 22:00 Sat. 2/20, with appeal for public conservation	09:20 Ended EEA and declared conservative operations through 22:00 Sat. 2/20, with appeal for public conservation		
			10:08 Declared EEA3 New record peak	10:07 – EEA3 Restored service					
Mon. 2/8: Issued resource alert to grid operators: "Implement resource preparations...ensure resource commitment start-up and run times ...report fuel shortages & transmission outages..."			12:10 Directed interruptions	11:30 Declared EEA2	13:15 Declared EEA1	18:20 Declared EEA2	18:25 – Declared EEA1		
			13:00 - EEA3 Restored service	12:31 Declared EEA1					
			14:00 Declared EEA2	18:28 Declared EEA2	22:59 Declared EEA1				
								22:00 Declared normal 78 operations	

**SOAH DOCKET NO. 473-21-3114
PUC DOCKET NO. 52397**

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

Question No. CARD 1-44:

Please provide documentation of notices provided by SWEPCO to Texas retail customers prior to and during the 2021 Winter Storm event requesting that customers conserve energy or otherwise informing customers of the high cost of energy during the event.

Response No. CARD 1-44:

SWEPCO issued an emergency appeal to conserve electricity, as requested by the Southwest Power Pool (SPP), on Feb. 14, 2021. The news release was posted on SWEPCO's website, distributed to SWEPCO's service territory news media, and posted to SWEPCO's social media platforms. The continuing request to conserve energy was included in news releases and social media posts during the controlled outages required by SPP on Feb. 15 and Feb. 16.

Please see CARD 1-44 Attachment 1 for a copy of the referenced news releases issued by SWEPCO.

Please see CARD 1-44 Attachment 2 for examples of the referenced social media posts made by SWEPCO.

Prepared By: Christopher N. Martel

Title: Regulatory Consultant Sr

Prepared By: Peter H. Main

Title: Corporate Comms Mgr

Prepared By: Lynn M. Ferry-Nelson

Title: Dir Regulatory Svcs

Sponsored By: Thomas P. Brice

Title: VP Regulatory & Finance

CARD 1-44
QA-56390
Compiled 8/30/2021

SWEPCO news releases

Feb. 14-16, 2021

<https://www.swepco.com/company/news/view?releaseID=5986>

SWEPCO ISSUES EMERGENCY APPEAL TO CONSERVE ELECTRICITY

February 14, 2021

SHREVEPORT, La. Feb. 14, 2021 – Southwestern Electric Power Co. (SWEPCO), acting upon a request of the Southwest Power Pool (SPP), is asking all customers to conserve electricity for 48 hours beginning at 12:01 a.m. Monday as extreme cold grips the region. SPP, the regional organization that manages the electric grid across 17 central and western U.S. states, reports a high demand for electricity that is expected to increase over the next several days because of persistent, widespread and extreme cold.

Steps to reduce electricity use include:

- Turn down the thermostat 2 to 3 degrees, especially overnight. (Consider wearing additional layers of clothing to remain comfortable.)
- Set programmable thermostats to lower temperatures when no one is home.
- Limit use of large appliances (i.e., dishwasher, washer, dryer, etc.)
- Avoid using unnecessary lighting and other electrical devices.
- Open curtains on the sunny side of the house to warm up your home. If there's no sun, close the shades to keep warm air inside.

SWEPCO asks its customers to take whatever measures they can to limit the use of electricity, so that no further actions are necessary. Customers' combined efforts can reduce overall demand for electricity and help ease the situation.

SWEPCO will provide updates through the news media, on [SWEPCO.com](https://www.swepco.com), and on the company's Facebook and Twitter pages.

SWEPCO customers in East Texas and the Panhandle also may hear advisories from neighboring grid operator Electric Reliability Council of Texas (ERCOT), which serves much of the rest of the state. SWEPCO is not part of ERCOT. SWEPCO is part of SPP, which is a separate regional reliability grid.

SPP is a regional transmission organization: a not-for-profit corporation mandated by the Federal Energy Regulatory Commission to ensure reliable supplies of power, adequate transmission infrastructure and competitive wholesale electricity prices on behalf of its members. SPP manages the electric grid across

17 central and western U.S. states and provides energy services on a contract basis to customers in both the Eastern and Western Interconnections. The company's headquarters are in Little Rock, Arkansas. Learn more at SPP.org.

About Southwestern Electric Power Co. (SWEPCO)

SWEPCO, an American Electric Power (Nasdaq: AEP) company, serves more than 543,000 customers in northwest and central Louisiana, northeast Texas and the Texas Panhandle, and western Arkansas. SWEPCO's headquarters are in Shreveport, La. News releases and other information about SWEPCO can be found at SWEPCO.com. Connect with us at Facebook.com/SWEPCO, Twitter.com/SWEPCOnews, Instagram.com/swepco, Youtube.com/SWEPCOtv and LinkedIn.com/company/swepco.

About American Electric Power (AEP)

American Electric Power, based in Columbus, Ohio, is focused on building a smarter energy infrastructure and delivering new technologies and custom energy solutions to our customers. AEP's approximately 17,000 employees operate and maintain the nation's largest electricity transmission system and more than 221,000 miles of distribution lines to efficiently deliver safe, reliable power to nearly 5.5 million regulated customers in 11 states. AEP also is one of the nation's largest electricity producers with approximately 30,000 megawatts of diverse generating capacity, including more than 5,300 megawatts of renewable energy. AEP's family of companies includes utilities AEP Ohio, AEP Texas, Appalachian Power (in Virginia and West Virginia), AEP Appalachian Power (in Tennessee), Indiana Michigan Power, Kentucky Power, Public Service Company of Oklahoma, and Southwestern Electric Power Company (in Arkansas, Louisiana, east Texas and the Texas Panhandle). AEP also owns AEP Energy, AEP Energy Partners, AEP OnSite Partners, and AEP Renewables, which provide innovative competitive energy solutions nationwide. For more information, visit aep.com.

<https://www.swepco.com/company/news/view?releaseID=5992>

SWEPCO IMPLEMENTS EMERGENCY CONTROLLED OUTAGES AS EXTREME WINTER WEATHER IMPACTS REGIONAL ELECTRIC SYSTEM

February 15, 2021

SHREVEPORT, La. Feb. 15, 2021 – Southwestern Electric Power Co. (SWEPCO) has begun temporarily interrupting power to parts of its service territory in an emergency procedure prompted by extreme winter temperatures.

The controlled outages are being implemented by utilities across multiple states as part of emergency procedures to reduce load on the electric system and prevent wider area outages. The action was taken at the direction of the Southwest Power Pool (SPP), the regional organization that manages the electric grid across 17 central and western U.S. states.

SWEPCO is rotating the areas affected by the controlled outages so customers are not without service for more than a few hours whenever possible. The amount of time required to restore service could be delayed in some cases due to system and weather conditions. The temporary outages should not affect critical public health and public safety facilities.

All efforts are under way to return service to normal as quickly as possible.

Customers should be prepared for electric service outages as the emergency continues in the next few days.

For customers who have service, please continue to conserve energy. Use energy needed for personal safety and to protect against property damage. Minor adjustments to thermostats, plus reduced use of lighting and appliances, can make a significant difference to the overall electric system.

At the request of SPP, SWEPCO on Sunday issued a public appeal to conserve energy Monday and Tuesday. However, conditions across the SPP system worsened and controlled outages were implemented amid persistent, widespread and extreme cold.

SWEPCO will provide updates through the news media, on SWEPCO.com, and on the company's Facebook and Twitter pages.

SPP is a regional transmission organization: a not-for-profit corporation mandated by the Federal Energy Regulatory Commission to ensure reliable supplies of power, adequate transmission infrastructure and competitive wholesale electricity prices on behalf of its members. SPP manages the electric grid across 17 central and western U.S. states and provides energy services on a contract basis to customers in both the Eastern and Western Interconnections. The company's headquarters are in Little Rock, Arkansas. Learn more at SPP.org.

[NOTE: SWEPCO customers in East Texas and the Panhandle also may hear advisories from neighboring grid operator Electric Reliability Council of Texas (ERCOT), which serves much of the rest of the state and is a separate reliability grid from SPP. SWEPCO is not part of ERCOT.]

About Southwestern Electric Power Co. (SWEPCO)

SWEPCO, an American Electric Power (Nasdaq: AEP) company, serves more than 543,000 customers in northwest and central Louisiana, northeast Texas and the Texas Panhandle, and western Arkansas. SWEPCO's headquarters are in Shreveport, La. News releases and other information about SWEPCO can be found at SWEPCO.com. Connect with us at [Facebook.com/SWEPCO](https://www.facebook.com/SWEPCO), [Twitter.com/SWEPCOnews](https://twitter.com/SWEPCOnews), [Instagram.com/swepco](https://www.instagram.com/swepco), [Youtube.com/SWEPCOtv](https://www.youtube.com/SWEPCOtv) and [LinkedIn.com/company/swepco](https://www.linkedin.com/company/swepco).

About American Electric Power (AEP)

American Electric Power, based in Columbus, Ohio, is focused on building a smarter energy infrastructure and delivering new technologies and custom energy solutions to our customers. AEP's approximately 17,000 employees operate and maintain the nation's largest electricity transmission system and more than 221,000 miles of distribution lines to efficiently deliver safe, reliable power to nearly 5.5 million regulated customers in 11 states. AEP also is one of the nation's largest electricity producers with approximately 30,000 megawatts of diverse generating capacity, including more than 5,300 megawatts of renewable energy. AEP's family of companies includes utilities AEP Ohio, AEP Texas, Appalachian Power (in Virginia and West Virginia), AEP Appalachian Power (in Tennessee), Indiana Michigan Power, Kentucky Power, Public Service Company of Oklahoma, and Southwestern Electric

Power Company (in Arkansas, Louisiana, east Texas and the Texas Panhandle). AEP also owns AEP Energy, AEP Energy Partners, AEP OnSite Partners, and AEP Renewables, which provide innovative competitive energy solutions nationwide. For more information, visit aep.com.

<https://www.swepco.com/company/news/view?releaseID=5995>

SWEPCO ENDS EMERGENCY CONTROLLED OUTAGES

February 15, 2021

SHREVEPORT, La. Feb. 15, 2021 – Southwestern Electric Power Co. (SWEPCO) has ended the controlled outages implemented today in an emergency procedure prompted by extreme winter temperatures.

The rotating controlled outages were implemented when SWEPCO and other utilities were called upon by the Southwest Power Pool (SPP), the regional organization that manages the electric grid across 17 central and western U.S. states. The planned and coordinated interruption of service is part of emergency procedures to reduce load on the electric system and prevent wider area outages.

The combined efforts of SWEPCO and other utilities achieved the required reduction in demand for electricity and SPP returned to a lower emergency level focused on continued energy conservation.

SWEPCO is completing the restoration of power to any remaining customers impacted by the temporary outages.

“This is an extraordinary weather situation, and we are continuing efforts to maintain reliability across the entire region,” said Malcolm Smoak, SWEPCO president and chief operating officer. “We appreciate the patience and understanding of our customers as we all work together to make it through this emergency.”

SWEPCO will keep customers informed of any changes over the next few days as the region continues to deal with persistent, widespread and extreme cold.

SWEPCO is asking customers to continue energy conservation efforts. Use energy needed for personal safety and to protect against property damage. Minor adjustments to thermostats, plus reduced use of lighting and appliances, can make a significant difference to the overall electric system.

At the request of SPP, SWEPCO on Sunday issued a public appeal to conserve energy Monday and Tuesday. However, conditions across the SPP system worsened and controlled outages were implemented.

SWEPCO will provide updates through the news media, on SWEPCO.com, and on the company’s Facebook and Twitter pages.

SPP is a regional transmission organization: a not-for-profit corporation mandated by the Federal Energy Regulatory Commission to ensure reliable supplies of power, adequate transmission infrastructure and competitive wholesale electricity prices on behalf of its members. SPP manages the electric grid across 17 central and western U.S. states and provides energy services on a contract basis to customers in both the Eastern and Western Interconnections. The company’s headquarters are in Little Rock, Arkansas. Learn more at SPP.org.

[NOTE: SWEPCO customers in East Texas and the Panhandle also may hear advisories from neighboring grid operator Electric Reliability Council of Texas (ERCOT), which serves much of the rest of the state and is a separate reliability grid from SPP. SWEPCO is not part of ERCOT.]

MEDIA CONTACTS:

Corporate Communications

Peter Main (479) 973-2526

Carey Sullivan (318) 673-3458

<https://www.swepco.com/company/news/view?releaseID=6001>

SWEPCO PUTS EMERGENCY CONTROLLED OUTAGES INTO EFFECT

February 16, 2021

SHREVEPORT, La. (7 a.m. February 16, 2021) – Southwestern Electric Power Co. (SWEPCO) has temporarily interrupted power to parts of its service area as part of an emergency procedure to reduce load on the electric system and prevent wider-area outages.

SWEPCO is rotating the areas affected by the controlled outages so customers are not without service for more than a few hours whenever possible. The amount of time required to restore service could be delayed in some cases due to system and weather conditions. The temporary outages should not affect critical public health and public safety facilities.

SWEPCO is taking this action at the direction of Southwest Power Pool, the electric grid operator for 14 states. The action is necessary because of heavy load on the regional electric grid due to extreme temperatures across the region.

Before taking this emergency step, SWEPCO cut back on its own use and requested large industrial and commercial customers to reduce their non-critical use.

SWEPCO is asking those customers who have service during the rotating outages to continue conserving energy until further notice. Use energy needed for personal safety and to protect against property damage. Minor adjustments to thermostats, plus reduced use of lighting and appliances, can make a significant difference to the overall electric system.

SWEPCO will provide updates through the news media, on www.swepco.com, and on the company's Facebook and Twitter pages.

SPP is a regional transmission organization: a not-for-profit corporation mandated by the Federal Energy Regulatory Commission to ensure reliable supplies of power, adequate transmission infrastructure and competitive wholesale electricity prices on behalf of its members. SPP manages the electric grid across 17 central and western U.S. states and provides energy services on a contract basis to customers in both the Eastern and Western Interconnections. The company's headquarters are in Little Rock, Arkansas. Learn more at SPP.org.

[NOTE: SWEPCO customers in East Texas and the Panhandle also may hear advisories from neighboring grid operator Electric Reliability Council of Texas (ERCOT), which serves much of the rest of the state and is a separate reliability grid from SPP. SWEPCO is not part of ERCOT.]

MEDIA CONTACTS:

Corporate Communications

Peter Main (479) 973-2526

Carey Sullivan (318) 673-3458

<https://www.swepco.com/company/news/view?releaseID=6009>

SWEPCO ENDS EMERGENCY CONTROLLED OUTAGES

February 16, 2021

As of 10:30 a.m. Tuesday, Feb. 16, SWEPCO has stopped temporarily interrupting power to parts of its service territory.

Depending on the demand for energy and supply available for customers, SWEPCO may temporarily interrupt power again, as directed by the regional grid operator. SWEPCO appreciates your patience and understanding.


The request to conserve energy during this emergency period continues.

CARD 1-44
QA-56390
Compiled 8/30/2021

SWEPCO social media

Feb. 14-16, 2021





**Southwestern Electric Power Company - SWEPCO**
February 15 at 12:34 PM · 🌐


SWEPCO is temporarily interrupting power to parts of its service territory in an emergency procedure prompted by extreme winter temperatures: <http://ms.spr.ly/6188p42rC>

SWEPCO is rotating the areas affected by the controlled outages so customers are not without service for more than a few hours whenever possible. System and weather conditions could delay the amount of time required to restore service in some cases.

The action was taken at the direction of the Southwest Power Pool (SPP), the regional organization that manages the electric grid across 17 central and western U.S. states.



**Emergency
controlled
outages
now in effect.**

An AEP Company

 192

449 Comments · 1.5K Shares

**Southwestern Electric Power Company - SWEPCO**February 15 at 2:11 PM · ⚙...

SWEPCO has stopped temporarily interrupting power to parts of its territory. Depending on the demand for energy and supply available for our customers, we may temporarily interrupt power again. Let's work together to reduce our electricity use. Consider these tips below to help conserve energy.

We need your help to conserve energy.




An AES Company



Turn off or unplug appliances and lights not being used.

Turn your thermostat down to 68°.

Make sure windows are sealed shut and close shades to keep heat in.




Southwestern Electric Power Company - SWEPCO
Yesterday at 7:00 AM · 🌤️

At 7 a.m., SWEPCO began temporarily interrupting power to parts of its service territory in an emergency procedure prompted by extreme winter temperatures.


SWEPCO is rotating the areas affected by the controlled outages so customers are not without service for more than a few hours whenever possible. System and weather conditions could delay the amount of time required to restore service in some cases.

The action was taken at the direction of the Southwest Power Pool (SPP), the regional organization that manages the electric grid across 17 central and western U.S. states.

We need your help to conserve energy.








Turn off or unplug appliances and lights not being used.


Turn your thermostat down to 68°.

Make sure windows are sealed shut and close shades to keep heat in.

252

768 Comments 1.3K Shares




Southwestern Electric Power Company - SWEPCO
...

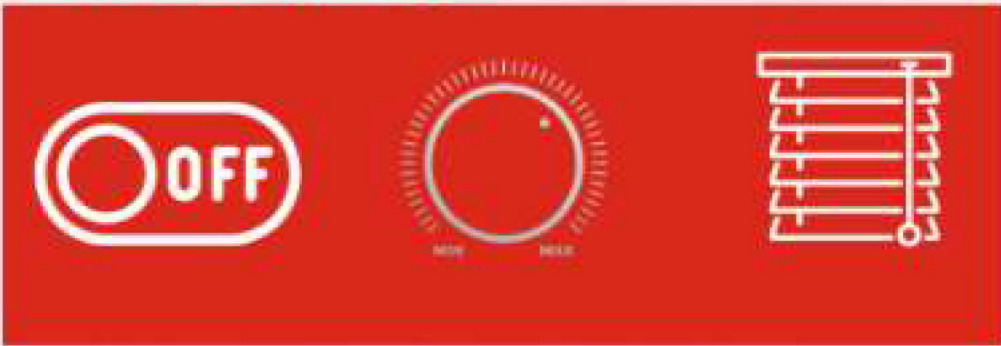
Yesterday at 11:19 AM · 🌐

As of 10:30 a.m., SWEPCO has stopped temporarily interrupting power to parts of its territory. Depending on the demand for energy and supply available for our customers, we may temporarily interrupt power again. We appreciate your patience and understanding. Let's work together to reduce our electricity use. Consider these tips below to help conserve energy.

We need your help to conserve energy.




An AEP Company



Turn off or unplug appliances and lights not being used.


Turn your thermostat down to 68°.

Make sure windows are sealed shut and close shades to keep heat in.



235

275 Comments 697 Shares



Southwestern Electric Power Company - SWEPCO

21h · 🌐


...

Let's work together to conserve energy over the next 48 hours. Limiting the use of large appliances like dishwashers and clothes dryers; turning off lights and setting thermostats at 68 degrees can prevent the need for controlled outages. We appreciate your patience and continued conservation efforts! [#SWEPCOStrong](#)

GRID CONDITION

**ENERGY
EMERGENCY
ALERT**




LEVEL 2 ISSUED AT 6:28 P.M. CT ON FEB. 16, 2021



Southwest Power Pool

22h · 🌐

At 6:28 p.m. Central time on Feb. 16, SPP declared an Energy Emergency Alert (EEA) Level 2. An EEA Level 2 requires SPP to direct its member companies to issue ... [See More](#)




172

92 Comments · 131 Shares

**Southwestern Electric Power Company - SWEPCO**6h · 🌐...

Fact: The Shreveport-Bossier area is served by multiple power plants, including ones in Arkansas and East Texas. Electricity demand remains high due to the extreme weather. We can prevent the need for controlled outages by continuing to conserve energy.

We need your help to conserve energy.


An AEP Company



Turn off or unplug appliances and lights not being used.

Turn your thermostat down to 68°.

Make sure windows are sealed shut and close shades to keep heat in.

 Karen E. Wissing and 76 others33 Comments 117 Shares

**SOAH DOCKET NO. 473-21-3114
PUC DOCKET NO. 52397**

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

Question No. CARD 1-45:

Please provide any tariffs or supply contracts under which SWEPCO had the right to curtail energy supplied to customers for economic reasons and indicate the number of customers and date and level of curtailment (MWh) that were curtailed under these contracts during the 2021 Winter Storm event.

Response No. CARD 1-45:

Please refer to CARD 1-45 Attachments 1 through 4 for SWEPCO's tariffs that provide for Interruption or Curtailment of SWEPCO customers.

Tariff 1 – There are 5 customers served under Tariff 1. These 5 customers were curtailed on February 15 for a level of curtailment of 18 MW. Three of the customers remained closed and off-line after the February 15 curtailment. The remaining 2 customers, were curtailed on February 16 and 17 for a level of curtailment of 9 MW. Please see CARD 1-45 Attachment 1.

Tariff 2. - There are 3 customers served under Tariff 2. Two of these customers were off-line and using zero energy during the month of February. The third customer was not interrupted as it was deemed to be providing a necessary service to meet human needs during the natural disaster. Please see CARD 1-45 Attachment 2.

Tariff 3 - There are no customers taking service under Tariff No. 3. Please see CARD 1-45 Attachment 3.

Tariff 4. – There are no customers taking service under Tariff No. 4. Please see CARD 1-45 Attachment 4.

Prepared By: Sonia B. Morgan

Title: Rates Mgr

Sponsored By: Sonia B. Morgan

Title: Rates Mgr

AVAILABILITY

This Rider is available only in conjunction with Company's Lighting and Power (LP) or Large Lighting and Power (LLP) rate schedules to Customers who contract for not less than 500 kW of curtailable power. The applicable rate schedule will be determined based on the Customers Total kW. All provisions of the Lighting and Power or Large Lighting and Power rate schedules, whichever is applicable, will apply except as modified herein. Service must be taken at one point of delivery and measured through one meter. This Rider is not available for backup power to customer owned generation. This Rider is not applicable in conjunction with Company's Economic Development Rider for loads designated as Curtailable kW.

The availability of service under this Rider is subject to the Company, in its sole judgment, having sufficient capacity and fuel to serve the requirements of its other customers and to maintain its spinning reserve. The availability of total system curtailable and interruptible kW contracted may be limited by the Company to an amount not to exceed 5% of the projected aggregate Company peak demand. Service is available under this Rider only if the utilization of such service is of such character that service can be curtailed at any time by Company, following 10 minutes notice by Company to Customer that service must be curtailed, without loss to Customer or damage to property or persons and without adversely affecting the public health, safety, and welfare.

DEFINITION OF TERMS

Total kW: Total kW is defined as the sum of the Firm kW and the Curtailable kW designated by the customer when contracting for service under this Rider and will be used to determine the applicable rate schedule.

Firm kW: Firm kW is defined as that portion of the Total kW that is not subject to curtailment under the terms and conditions of this Rider. The Firm kW will be designated by the Customer when contracting for service under this Rider. In addition, Firm kW may be adjusted annually by the Customer by written request to the Company.

Curtailable kW: Curtailable kW is defined as that portion of the Total kW subject to curtailment by the Company under this Rider. The Curtailable kW will be designated by the Customer when contracting for service. In addition, Curtailable kW may be adjusted annually by the Customer by written request to the Company.

CONDITIONS OF SERVICE

Customer may choose to have Total kW or some portion thereof designated as Curtailable kW. The amount of Total kW not designated as Firm kW shall constitute Customer's Curtailable kW. Customer's service must be equipped, at Customer's expense, with devices necessary to reduce Total kW during the period of curtailment to Firm kW or below and with metering devices necessary to verify that Total kW is at or below the Firm kW. In addition, the Company may request that the Customer's service be equipped, at Customer's expense, with communication equipment necessary to provide instantaneous load information to Company's designated system operating center.

Company will request curtailment of electric service under this Rider as the Company deems necessary for any reason including, but not limited to, maintaining service to firm loads, avoiding establishment of a new system peak, avoiding establishment of a peak demand in excess of 95% of the Company's forecasted peak load for the year, maintaining service integrity in the area, or other situations when reduction in load on the Company's system is warranted. To the extent possible, curtailable loads served under this Rider will be curtailed before any curtailment of firm loads is requested or required. Requests for curtailment will be made by Company's System Operator via telephonic communication to Customer's designated representative(s). Upon application for service under this Rider, Customer shall designate the representative(s) and provide the telephone number at which they may be reached 24 hours a day. In the event of a curtailment for non-emergency purposes, Company will endeavor to provide notice to Customer at least 30 minutes prior to curtailment. In the event of a curtailment for emergency conditions, Company will attempt to provide as much prior notice as possible but is in no way obligated to give more than 10 minutes notice prior to curtailment. Absence of a designated representative or inability of the Company to communicate with the designated representative because of unanswered telephone, busy telephone, or otherwise, once

Company has initiated a telephonic communication to the designated representative, will in no way be regarded as an excuse for failure to comply with a curtailment request. The Company may request the customer to install at Customer's expense electronic equipment necessary for automatic notification of curtailment.

MONTHLY CHARGES AND CREDITS

Customer's net monthly bill for service provided under this Rider will be calculated in accordance with Company's applicable rate schedule, with the exception that a Curtailable Power Credit will be applied. The Curtailable Power Credit will be determined by applying a Demand Credit to the portion of the average kilowatt load used by the Customer during the 15 minute period of maximum use during the month in excess of the Firm kW. However, the Curtailable Power Credit will not exceed the product of the Demand Credit and the Curtailable kW.

The Demand Credit used to calculate the Monthly Curtailable Power Credit will be:

VOLTAGE LEVEL	DEMAND CREDIT
Secondary Service	\$3.19/kW
Primary Service	\$3.06/kW
Transmission Service	\$2.91/kW

NON-COMPLIANCE PROVISIONS

Customer understands that service under this Rider is contingent upon Customer's complete and timely compliance with Company's requests for curtailment. If, at any time, Customer fails in whole or in part to implement or maintain any request for curtailment to reduce the Total kW to

the Firm kW, the Company may, at its option, elect to cancel, effective immediately, the Customer's eligibility for service under this Rider. Should the Company exercise this option, billing for the current and subsequent eleven (11) months will revert to the LP or LLP rate schedule, whichever is applicable. In addition, any Curtailable Power Credits received by the Customer during the 11 previous months shall be forfeited and reimbursed with interest to the Company over the six (6) month period following the cancellation of Customer's eligibility for service under this Rider.

LIMITATIONS ON CURTAILMENTS

Curtailments under this Rider are limited as follows:

Daily Limit: No longer than 12 hours in any day, measured from midnight to midnight, except during system emergencies as described below.

Annual Limit: No more than 400 hours in any calendar year.

The only curtailments included in curtailment time limits are those implemented at the request of Company for the purposes described in the "Conditions of Service" above. Extended interruptions resulting from failure of transmission or distribution equipment are not included in curtailment time limits. Curtailment time is measured from the time the Company notifies the Customer via telephonic communication when the period of curtailment will begin to the time that Company notifies Customer via telephonic communication that the period of curtailment will end.

During system emergencies when Company has made public pleas to restrict electric energy usage to essential needs because of an area or statewide shortage of electric power and/or energy, curtailable loads served under this Rider may be curtailed continuously without daily limit until such emergency condition has ended. Such curtailments shall be included in annual curtailment time limits.

Curtailments of less than 15 minutes in duration shall constitute a 15-minute period for inclusion in Curtailable time limits.

Contract Minimum: The customer's minimum bill shall not be less than the applicable charge for the contracted demand minimum plus the applicable Fuel and Tax Adjustments and in no event shall the contract demand minimum be less than 500 kilowatts.

TERM OF CONTRACT

This Rider is being offered as an experimental service and may be withdrawn by the Company following written notice to each Customer served under the Rider given at least one year prior to such withdrawal. The obligation of the Customer shall continue for a minimum initial term of one year and continuing thereafter unless canceled by Customer following written notice given at least one year prior to such cancellation.

PAYMENT FOR SERVICE

Payment for Service Rider - See Rate Schedule 44.

AVAILABILITY

This schedule is available for loads of not less than 1,000 kilowatts at points along Company's existing transmission lines of 69 KV or higher having sufficient kilovolt-amperes available to service such loads provided interruptible capacity in the opinion of the Company is available. It is understood that electric service furnished hereunder is subject to interruption as set forth in the following conditions of service.

CHARACTER OF SERVICE

Electric power and energy delivered by Company to Customer will be three phase, 60-cycle, alternating current, at a nominal voltage of 69 KV or higher. Metering will be at or adjusted to the service voltage.

CONDITIONS OF SERVICE

The cost of providing facilities necessary to connect the Customer's load to the system of the Company will be paid for by the Customer.

The Customer will provide a control circuit to a Company location that can be operated by Company supervisory control to interrupt Customer's load.

The Company will interrupt Customer's load for up to 30 times each Interruptible Year for a total of 150 hours. Company will endeavor to notify Customer at least 30 minutes in advance of the required interruption. Interruptible load will be subject to immediate interruption for emergency system conditions in addition to the above. The Interruptible Year will begin June 1 and will end May 31 of the following year.

MONTHLY RATE

Kilowatt Charge: \$5.15 per Kilowatt of Billing Demand

Kilowatt-hour (kWh) Charge: .848¢ per kWh for all kWh

Minimum Monthly Bill: The minimum monthly bill will be \$5.15 per Kilowatt of Billing Demand previously established but not less than \$5,150.

Power Factor Adjustment: In the event the power factor at the time of establishment of any 15-minute period of maximum use during the month is less than 90%, the Kilowatts of Billing Demand shall be adjusted by multiplying the Kilowatts of Billing Demand by 90% and dividing the result by the actual power factor at the time of said maximum use, and the result so obtained shall be the Kilowatts of Billing Demand for the month.

Fuel Cost Component of Monthly Rates: In addition to all other charges, the amount of the bill will be increased by an amount per kWh as provided in the Fixed Fuel Factor schedule, Sheet IV-34.

Additional Components of Monthly Rates: This rate schedule is subject to other applicable rate adjustments in effect from time to time in this tariff.

Determination of Kilowatts of Billing Demand: The Kilowatts of Billing Demand for each month will be the average kilowatt load used by the Customer during the 15-minute period of maximum use during the month. The Kilowatts of Billing Demand will be subject to the Power Factor Adjustment clause.

Capacity Charge for Highly Fluctuating Loads: Should the Customer operate equipment with highly fluctuating, intermittent, or abnormal characteristics that make it necessary for the Company to install special facilities to serve the Customer or to prevent disturbances to the service of other Customers, an additional charge of \$1.60 per month per kilovolt-ampere (KVA) or fraction thereof of transformer capacity installed by the Company to serve the Customer will be added to the Customer's bill.

PAYMENT FOR SERVICE

Bills for electric service are due 16 days after the date of issuance and become delinquent if not paid by the due date. Bills paid after the due date will be assessed a penalty of 2% of the total monthly bill. If the bill is unpaid after the due date, service is subject to being disconnected in accordance with the rules of the Public Utility Commission of Texas.

TERMS AND CONDITIONS

Service will be furnished under the Company's Standard Terms and Conditions.

Pursuant to PURA § 36.211, certain charges will be made effective for consumption on and after May 20, 2017 through the surcharge set out in Tariff Sheet IV-60, Temporary Rate Reconciliation Rider.

APPLICABILITY

This schedule is available for Interruptible Power up to the size of Customer-owned and operated power production equipment or other sources of power not held primarily for emergency use.

Service will be supplied at one point of delivery at locations where facilities of adequate capacity and suitable phase and voltage are available. Service will be provided on the Company's standard Contract for Electric Service to Customers having a separate agreement for interconnection to Company's system stating these terms and conditions.

It is understood that electric service furnished hereunder is subject to interruption as set forth in the following conditions of service.

CONDITIONS OF SERVICE

The cost to the Company of providing any facilities necessary to connect the Customer's load to the system of the Company and to interrupt the Customer's load will be paid for by the Customer in accordance with the Company's approved Monthly Charge for Special or Additional Facilities.

The Company will interrupt at the Company's sole discretion the Customer's total load at the point of delivery. When required by the method of interconnection, the Customer will provide any necessary interrupting devices and a control circuit to a Company location that can be operated by Company supervisory control to interrupt Customer's load.

MONTHLY RATE

Kilowatt Charge:

	<u>Secondary Service</u>	<u>Primary Service</u>	<u>Transmission Service</u>
Per Kilowatt of Billing Demand:	\$5.16	\$3.76	\$3.44

Kilowatt-Hour Charge:

	<u>Secondary</u>	<u>Primary</u>	<u>Transmission</u>
Per Kilowatt-hour:	1.281¢	.846¢	.788¢

Kilovar Charge: The Kilovars of Reactive Demand will be recorded each month by the Company and will be the average kilovars used by the Customer during the 15-minute period of maximum kilovar use during the month. A charge of \$0.51 per month shall be made for each Kilovar of Reactive Demand exceeding 50% of the Kilowatts of Billing Demand.

Fuel Cost Component of Monthly Rates: In addition to all other charges, the amount of the bill will be increased by an amount per kWh as provided in the Fixed Fuel Factor schedule, Sheet IV-34.

Additional Components of Monthly Rates: This rate schedule is subject to other applicable rate adjustments in effect from time to time in this tariff.

Determination of Kilowatts of Billing Demand: The Kilowatts of Billing Demand for each month will be the average kilowatt load used by the Customer during the 15-minute period of maximum use during the month, but not less than the highest Kilowatts of Billing Demand established during the 11 preceding months.

Capacity Charge for Highly Fluctuating Loads: Should the Customer operate equipment with highly fluctuating, intermittent, or abnormal characteristics that make it necessary for the Company to install special facilities to serve the Customer or to prevent disturbances to the service of other Customers, an additional charge of \$1.60 per month per kilovolt-ampere (KVA) or fraction thereof of transformer capacity installed by the Company to serve the Customer will be added to the Customer's bill.

PAYMENT FOR SERVICE

Bills for electric service are due 16 days after the date of issuance and become delinquent if not paid by the due date. Bills paid after the due date will be assessed a penalty of 2% of the total monthly bill. If the bill is unpaid after the due date, service is subject to being disconnected in accordance with the rules of the Public Utility Commission of Texas.

TERMS AND CONDITIONS

Service will be furnished under the Company's standard contract containing the Standard Terms and Conditions and will be recognized as an exemption to the Exclusive Service Clause of the Company's Standard Terms and Conditions.

Pursuant to PURA § 36.211, certain charges will be made effective for consumption on and after May 20, 2017 through the surcharge set out in Tariff Sheet IV-60, Temporary Rate Reconciliation Rider.

AVAILABILITY

This rate is available to U S Steel Tubular Products, Inc.-Texas Operations Division for service provided under a contract specifying the limits and conditions of service as a rate that is subject to change by the regulatory authority having jurisdiction during the course of any rate proceeding.

I. BASIC RATES FOR ELECTRIC SERVICE

A. Rate Determination:

1. Firm Load:

Kilowatt Charge: \$7.08 per kilowatt for the Firm Load Kilowatts of Billing Demand.

Kilowatt-hour Charge: 0.7268¢ per kilowatt-hour for all Firm Load kilowatt-hours with kilowatt-hours from metered data for usage levels up to the Firm Load Kilowatts of Billing Demand.

2. Rates for Turbine-Generator Overhaul and Emergency Power are applicable only when this type of power is used with kilowatt-hours from metered data for the usage levels specified. Turbine-Generator overhaul kilowatt-hours will be at the firm load rate. Emergency Power kilowatt-hours will be at the Power Emergency rate.

3. Curtailable Load:

Kilowatt Charge: \$5.29 per kilowatt for the Curtailable Load Kilowatts of Billing Demand.

Kilowatt-hour Charge: 0.65¢ per kilowatt-hour with the kilowatt-hours metered for usage between the Firm Load Kilowatts of Billing Demand and the Curtailable Load Kilowatts of Billing Demand.

4. Off-Peak Load:

Kilowatt Charge: \$3.53 per kilowatt for the Off-Peak Kilowatts of Billing Demand.

Kilowatt-hour Charge: 0.65¢ per kilowatt-hour with the kilowatt-hours metered for usage between the Curtailable Load Kilowatts of Billing Demand and the Off-Peak Kilowatts of Billing Demand.

B. Determination of Kilowatts of Billing Demand:

The Kilowatts of Billing Demand for each month will be the average kilowatt load used by the Customer during the 30 minute period of maximum use comprised of two consecutive 15 minute periods (with each clock hour being divided into quarter hours) during the on-peak and off-peak hours of the month and will be determined in the following manner and sequence:

1. Firm Load Kilowatts of Billing Demand: will be specified from time to time by Customer within the contract constraints. Any change in Firm Load requires at least 72 hours prior notice to Company with written confirmation being sent within 24 hours of such notice. An increase will be effective for the entire month in which requested to be effective and a decrease will be effective after the end of such month.
2. Turbine-Generator Overhaul Kilowatts of Billing Demand: will be specified in advance by Customer and shall be considered as Firm Load Kilowatts of Billing Demand during the agreed upon period and shall not be used in the Determination of Minimum Kilowatts of Billing Demand.
3. Emergency Power Kilowatts of Billing Demand: will be specified, at the beginning of Emergency Power use by Customer with written confirmation within 24 hours. Customer will notify Company when the emergency has been completed with written confirmation within 24 hours. Emergency Power Kilowatts of Billing Demand as specified will be in addition to the Firm Load Kilowatts of Billing Demand but will be considered as Firm Load Kilowatts of Billing Demand in determining Curtailable and off-peak Kilowatts of Billing Demand. Emergency Power Kilowatts of Billing Demand shall not be used in the Determination of Minimum Kilowatts of Billing Demand.
4. Curtailable Load Kilowatts of Billing Demand: will be the on-peak hours determination of Kilowatts of Billing Demand less the Firm Load Kilowatts of Billing Demand.
5. Off-Peak Kilowatts of Billing Demand: will be the off-peak hours determination of Kilowatts of Billing Demand less the on-peak hours determination of Kilowatts of Billing Demand and shall not be used in the Determination of Minimum Kilowatts of Billing Demand.

C. Monthly Kilowatt Charge

The monthly kilowatt charge will be the charge for the Kilowatts of Billing Demand for the current month or the Minimum Kilowatts of Billing Demand, whichever is greater as determined in the following manner and sequence:

1. Firm load kilowatts of billing demand at the firm load rate, plus
2. Turbine-Generator or Emergency Power Kilowatts of Billing Demand are applicable only when the power is utilized (not to be used in Minimum Kilowatts of Billing Demand), plus
3. Curtailable Load Kilowatts of Billing Demand at the rate for curtailable load, plus
4. Off-peak Load Kilowatts of Billing Demand at the rate for off-peak load (not to be used in the Minimum Kilowatts of Billing Demand).

D. Firm Load

Demand and energy used regularly on an as needed basis not subject to normal interruption for load management by Company.

E. Curtailable Load

Demand and energy used in addition to firm load used regularly on an as needed basis within limits of the contract but subject to interruption for up to 30 times during the curtailable year for a total of 150 hours. Curtailable load will be subject to immediate interruption for emergency system conditions in addition to the above.

F. Curtailable Year

Beginning June 1 and Ending May 31 of the following year.

G. Interruption Procedure for Curtailable Load

The interruption procedure will be in the following order:

1. Company's system dispatcher will request Customer's designated representative(s) to reduce load to an amount that is not less than firm load amount. Company will attempt to provide at least 30 minutes notice but will provide not less than a minimum of 15 minutes notice to Customer to reduce its load to the requested load amount. Interruptions for emergency system conditions as noted previously shall be subject to immediate interruption.
2. If Customer's demand exceeds the predetermined level after actions in step 1 of the interruption procedure, Company shall interrupt total plant service.

H. Off-Peak Load

Demand and energy used in addition to firm or curtailable load only during the off-peak hours subject to the following limitations. The average kilowatt load during the off-peak hours will not exceed the on-peak demand by more than 50,000 kilowatts; provided however, the off-peak demand shall not exceed the on-peak demand by more than 30,000 kilowatts during the hours from 6:00 A.M. to 7:30 A.M. in the months of October, November, December, January, February, March and April.

The Off-Peak Demand limitation of 30,000 kilowatts shall not apply on Saturday or Sunday or the day of a National Holiday. Any Demand in excess of the maximum Off-Peak Demands specified above shall be considered as On-Peak Demands and billed accordingly. Provided further however, Company shall have the right of normal interruption back to the Firm Load during the hours from 3:30 P.M. to 8:00 P.M. in the months of October through April of any calendar year and during the hours from 8:00 A.M. to 2:00 P.M. in the months of May through September of any calendar year.

- I. Off-Peak Hours and On-Peak Hours: In the months of May through September of any calendar year, the On-Peak Hours are those hours between 2:00 P.M. and 10:00 P.M., Monday through Friday; the Off-Peak Hours are those between 10:00 P.M. on one day to 2:00 P.M. on the following day, Monday through Thursday and 10:00 P.M. on Friday to 2:00 P.M. the following Monday. In the months of October through April of any calendar year, the On-Peak Hours are those hours between 7:30 A.M. and 3:30 P.M., Monday through Friday; the Off-Peak Hours are those between 3:30 P.M. on one day to 7:30 A.M. on the following day, Monday through Thursday and 3:30 P.M. on Friday to 7:30 A.M. the following Monday. The On-Peak Hours of the following National Holidays shall be considered Off-Peak Hours in this Agreement: New Year's Day, Independence Day, Labor Day, Thanksgiving Day and Christmas Day. Should any of these days fall on Sunday, the following Monday shall be considered a National Holiday, likewise should any of these days fall on Saturday, the preceding Friday shall be considered a National Holiday.
- J. The combined total amount of Curtailable and Off-Peak Load will be limited to the Curtailable Load plus 50,000 KW. Any demand during Off-Peak Hours in excess of Curtailable Load plus 50,000 KW will be considered Firm Load Demand.

II. MINIMUM KILOWATTS OF BILLING DEMAND:

The Minimum Kilowatts of Billing Demand will be higher of (a) the charge for the On-Peak Demand of the current month, but not less than the charge for 40,000 kilowatts, or (b) any contract provisions.

III. DETERMINATION OF KILOVAR CHARGE:

The reactive demand in kilovars will be recorded by SWEPCO. In each month a charge of 51 cents per month shall be made for each kilovar by which U.S. Steel's maximum 30 minute reactive demand in kilovars is greater than 50 percent of U.S. Steel's maximum 30 minute kilowatt demand during the same time period in that month.

IV. FUEL COST COMPONENT OF MONTHLY RATES:

In addition to all other charges, the amount of the bill will be increased by an amount per kWh as provided in the Fixed Fuel Factor schedule, Sheet IV-34.

V. ADDITIONAL COMPONENTS OF MONTHLY RATES

This rate schedule is subject to other applicable rate adjustments in effect from time to time in this tariff.

VI. TURBINE-GENERATOR OVERHAUL:

It is recognized that it will be necessary for the integrated operation of the turbine-generators of Customer and power service of SWEPCO, that scheduled overhaul periods on the equipment of Customer must be fitted into the similar schedules of SWEPCO as determined by SWEPCO's Chief System Operator. During the agreed upon period of overhaul, the Turbine-Generator Overhaul Kilowatts of Billing Demand shall be determined in accordance with the provisions as stated in the "Determination of Kilowatts of Billing Demand" section, except that The Kilowatts of Billing Demand in excess of the Kilowatts of billing Demand established under normal operations, shall be prorated on a daily basis during the billing periods when such overhauls are being accomplished. The Turbine-Generator Overhaul Kilowatts of Billing Demand established during the overhaul period shall not be used in the Minimum Kilowatts of Minimum Billing Demand and shall only be applicable during the actual period of overhaul.

VII. EMERGENCY POWER AND ENERGY:

It is recognized that emergencies may arise in operation of Customer's plant occasioned by a breakdown of the existing generating plant of Customer whereby additional power is required. Therefore, SWEPCO, on request of Customer, agrees to furnish as it has available such emergency power and corresponding energy as may be required by Customer. In addition to normal billing, additional power and energy furnished during such emergency shall be on the following basis:

0.36¢ per kilowatt-hour plus the Fuel Cost Component of Base Rates (Schedule FC) or 110 percent (110%) of SWEPCO's cost of energy whichever is the greater amount for all emergency kilowatt-hours supplied to Customer plus 29.8¢ per kilowatt per day for each Kilowatt of Billing Demand established above the Firm Load Kilowatts of Billing Demand.

The Kilowatts of Billing Demand established during periods of emergency shall not be used in the Determination of Kilowatts of Minimum Billing Demand and shall only be applicable during the month(s) that the emergency power and energy is supplied.

VIII. BILLING AND PAYMENTS:

Bills for services furnished are rendered monthly and are due and payable within sixteen (16) days of date of bill. A sum equivalent to 1% of the total bill will be added to Customer's total monthly bill, but will be collected only in the event Customer fails to pay in full on or before the due date shown on the bill.

Pursuant to PURA § 36.211, certain charges will be made effective for consumption on and after May 20, 2017 through the surcharge set out in Tariff Sheet IV-60, Temporary Rate Reconciliation Rider.

The following files are not convertible:

CARD_1-
3_Attachment_1_(Winter_Event_Calc).xlsx
CARD_1-6_Attachment_1.xlsx
CARD_-_1-34_-_Attachment_1.xlsx
CARD_1-36_Attachment_1.xlsx
CARD_1-
37_Attachment_1_(OSS_Margins).xlsx

Please see the ZIP file for this Filing on the PUC Interchange in order to access these files.

Contact centralrecords@puc.texas.gov if you have any questions.