

	Description: Settlement/Non-binding ADR Communicate with client P. Osterloh re settlement schedule preparation /PUCT-Settlement Activities Adjustment: 09/14/2022 - Amount adjusted by 1.72 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 7% discount to vendor fees per billing discount agreement									
43	08/26/2022	Fee	L160 Settlement/Non-Binding ADR	Green, Stephanie	245.00	2.10	36.02	0.00	0.00	478.48
	Activity: A103 Draft/revise Description: Settlement/Non-binding ADR Draft/Revise settlement documents /PUCT-Settlement Activities Adjustment: 09/14/2022 - Amount adjusted by 36.02 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 7% discount to vendor fees per billing discount agreement									
44	08/28/2022	Fee	L160 Settlement/Non-Binding ADR	Green, Stephanie	245.00	3.10	53.16	0.00	0.00	706.34
	Activity: A103 Draft/revise Description: Settlement/Non-binding ADR Draft/Revise settlement package /PUCT-Settlement Activities Adjustment: 09/14/2022 - Amount adjusted by 53.16 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 7% discount to vendor fees per billing discount agreement									
45	08/29/2022	Fee	L160 Settlement/Non-Binding ADR	Green, Stephanie	245.00	0.10	1.72	0.00	0.00	22.78
	Activity: A106 Communicate (with client) Description: Settlement/Non-binding ADR Communicate with client J. Harrison re clarification of Schedule D /PUCT-Settlement Activities. Adjustment: 09/14/2022 - Amount adjusted by 1.72 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 7% discount to vendor fees per billing discount agreement									
46	08/30/2022	Fee	L160 Settlement/Non-Binding ADR	Pearsall, Patrick	370.00	0.50	12.95	0.00	0.00	172.05
	Activity: A103 Draft/revise Description: Settlement/Non-binding ADR Draft/Revise settlement document filing package /PUCT-Settlement Activities. Adjustment: 09/14/2022 - Amount adjusted by 12.95 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 7% discount to vendor fees per billing discount agreement									
47	08/31/2022	Fee	L160 Settlement/Non-Binding ADR	Pearsall, Patrick	370.00	0.40	10.36	0.00	0.00	137.64
	Activity: A103 Draft/revise Description: Settlement/Non-binding ADR Draft/Revise settlement document filing package /PUCT-Settlement Activities. Adjustment: 09/14/2022 - Amount adjusted by 10.36 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 7% discount to vendor fees per billing discount agreement									
48	08/31/2022	Fee	L160 Settlement/Non-Binding ADR	Pearsall, Patrick	370.00	0.20	5.18	0.00	0.00	68.82
	Activity: A104 Review/analyze Description: Settlement/Non-binding ADR Review/Analyze issues re scope and structure of settlement filing package /PUCT-Settlement Activities Adjustment: 09/14/2022 - Amount adjusted by 5.18 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 7% discount to vendor fees per billing discount agreement									
49	08/31/2022	Fee	L120 Analysis/Strategy	Green, Stephanie	245.00	0.30	5.14	0.00	0.00	68.36
	Activity: A104 Review/analyze Description: Analysis/Strategy Review/Analyze status of matter, communications with Staff, preparation of settlement documents, and directions from client /PUCT-Overall Case Strategy. Adjustment: 09/14/2022 - Amount adjusted by 5.14 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 7% discount to vendor fees per billing discount agreement									

Completed Requests

Item	Request Name	Requestor	Request Date	Completion Date	Comment	Outcome
1	Post Invoice for 3,677.59 USD	Duggins Wren Mann & Romero, LLP	09/14/2022	09/16/2022		Approved
	Approval History					

	Adjustment: 10/13/2022 - Amount adjusted by 1 72 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 7% discount to vendor fees per billing discount agreement										
7	09/02/2022	Fee	L160 Settlement/Non-Binding ADR	Pearsall, Patrick	370.00	0.20	5.18	0.00	0.00		68.82
	Activity: A104 Review/analyze Description: Settlement/Non-binding ADR Review/Analyze communications with Staff and Intervenor counsel re settlement status report /PUCT-Settlement Activities. Adjustment: 10/13/2022 - Amount adjusted by 5 18 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 7% discount to vendor fees per billing discount agreement										
8	09/04/2022	Fee	L160 Settlement/Non-Binding ADR	Green, Stephanie	245.00	0.90	15.44	0.00	0.00		205.06
	Activity: A104 Review/analyze Description: Settlement/Non-binding ADR Review/Analyze EECRF orders issued in recent dockets and confirm Proposed Order ("PO") consistency with same; prepare settlement documents for internal circulation /PUCT-Settlement Activities. Adjustment: 10/13/2022 - Amount adjusted by 15.44 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 7% discount to vendor fees per billing discount agreement										
9	09/05/2022	Fee	L210 Pleadings	Green, Stephanie	245.00	0.10	1.72	0.00	0.00		22.78
	Activity: A108 Communicate (other external) Description: Pleadings Communicate with other external E. D'Ambrosio re status report filing /PUCT-Non-Discovery Pleadings and Motions. Adjustment: 10/13/2022 - Amount adjusted by 1 72 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 7% discount to vendor fees per billing discount agreement										
10	09/06/2022	Fee	L210 Pleadings	Pearsall, Patrick	370.00	0.10	2.59	0.00	0.00		34.41
	Activity: A104 Review/analyze Description: Pleadings Review/Analyze final draft of status report /PUCT-Non-Discovery Pleadings and Motions. Adjustment: 10/13/2022 - Amount adjusted by 2 59 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 7% discount to vendor fees per billing discount agreement										
11	09/06/2022	Fee	L210 Pleadings	Green, Stephanie	245.00	0.20	3.43	0.00	0.00		45.57
	Activity: A104 Review/analyze Description: Pleadings Review/Analyze and prepare joint agreed status report for filing /PUCT-Non-Discovery Pleadings and Motions. Adjustment: 10/13/2022 - Amount adjusted by 3.43 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 7% discount to vendor fees per billing discount agreement										
12	09/09/2022	Fee	L160 Settlement/Non-Binding ADR	Pearsall, Patrick	370.00	0.20	5.18	0.00	0.00		68.82
	Activity: A106 Communicate (with client) Description: Settlement/Non-binding ADR Communicate with client L. Melhem re settlement filing package /PUCT-Settlement Activities. Adjustment: 10/13/2022 - Amount adjusted by 5 18 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 7% discount to vendor fees per billing discount agreement										
13	09/09/2022	Fee	L160 Settlement/Non-Binding ADR	Green, Stephanie	245.00	0.30	5.14	0.00	0.00		68.36
	Activity: A106 Communicate (with client) Description: Settlement/Non-binding ADR Communicate with client P. Osterloh and D. Trevino re settlement document review and confirmation of proposed order findings and conclusions /PUCT-Settlement Activities. Adjustment: 10/13/2022 - Amount adjusted by 5 14 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 7% discount to vendor fees per billing discount agreement										
14	09/09/2022	Fee	L160 Settlement/Non-Binding ADR	Green, Stephanie	245.00	0.30	5.14	0.00	0.00		68.36
	Activity: A106 Communicate (with client) Description: Settlement/Non-binding ADR Communicate with client P. Osterloh and D. Trevino re settlement documents and findings /PUCT-Settlement Activities. Adjustment: 10/13/2022 - Amount adjusted by 5.14 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 7% discount to vendor fees per billing discount agreement										

	Activity: A103 Draft/revise Description: Settlement/Non-binding ADR Draft/Revise and update settlement documents and confirm settlement schedule data /PUCT-Settlement Activities. Adjustment: 10/13/2022 - Amount adjusted by 13.72 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 7% discount to vendor fees per billing discount agreement										
16	09/09/2022	Fee	L160 Settlement/Non-Binding ADR	Green, Stephanie	245.00	0.10	1.72	0.00	0.00		22.78
	Activity: A106 Communicate (with client) Description: Settlement/Non-binding ADR Communicate with client R. Cavazos et al. re settlement documents and confirmation of same /PUCT-Settlement Activities Adjustment: 10/13/2022 - Amount adjusted by 1.72 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 7% discount to vendor fees per billing discount agreement										
17	09/12/2022	Fee	L160 Settlement/Non-Binding ADR	Pearsall, Patrick	370.00	0.60	15.54	0.00	0.00		206.46
	Activity: A104 Review/analyze Description: Settlement/Non-binding ADR Review/Analyze issues re draft stipulation, proposed order, and order admitting evidence and remanding proceeding /PUCT-Settlement Activities Adjustment: 10/13/2022 - Amount adjusted by 15.54 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 7% discount to vendor fees per billing discount agreement										
18	09/12/2022	Fee	L160 Settlement/Non-Binding ADR	Pearsall, Patrick	370.00	0.20	5.18	0.00	0.00		68.82
	Activity: A106 Communicate (with client) Description: Settlement/Non-binding ADR Communicate with client L. Melhem re stipulation and order admitting evidence and remanding proceeding /PUCT-Settlement Activities. Adjustment: 10/13/2022 - Amount adjusted by 5.18 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 7% discount to vendor fees per billing discount agreement										
19	09/12/2022	Fee	L160 Settlement/Non-Binding ADR	Green, Stephanie	245.00	0.20	3.43	0.00	0.00		45.57
	Activity: A104 Review/analyze Description: Settlement/Non-binding ADR Review/Analyze revisions to settlement documents /PUCT-Settlement Activities. Adjustment: 10/13/2022 - Amount adjusted by 3.43 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 7% discount to vendor fees per billing discount agreement										
20	09/13/2022	Fee	L160 Settlement/Non-Binding ADR	Pearsall, Patrick	370.00	0.70	18.13	0.00	0.00		240.87
	Activity: A104 Review/analyze Description: Settlement/Non-binding ADR Review/Analyze issues re finalizing settlement package /PUCT-Settlement Activities Adjustment: 10/13/2022 - Amount adjusted by 18.13 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 7% discount to vendor fees per billing discount agreement										
21	09/13/2022	Fee	L160 Settlement/Non-Binding ADR	Green, Stephanie	245.00	0.80	13.72	0.00	0.00		182.28
	Activity: A104 Review/analyze Description: Settlement/Non-binding ADR Review/Analyze and provide information re Proposed Order findings confirmation in preparation of updated settlement document package redline and clean review versions /PUCT-Settlement Activities Adjustment: 10/13/2022 - Amount adjusted by 13.72 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 7% discount to vendor fees per billing discount agreement										
22	09/13/2022	Fee	L160 Settlement/Non-Binding ADR	Green, Stephanie	245.00	0.40	6.86	0.00	0.00		91.14
	Activity: A106 Communicate (with client) Description: Settlement/Non-binding ADR Communicate with client L. Melhem re updated settlement document package /PUCT-Settlement Activities. Adjustment: 10/13/2022 - Amount adjusted by 6.86 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 7% discount to vendor fees per billing discount agreement										
23	09/15/2022	Fee	L160 Settlement/Non-Binding ADR	Pearsall, Patrick	370.00	0.40	10.36	0.00	0.00		137.64
	Activity: A106 Communicate (with client) Description: Settlement/Non-binding ADR Communicate with client L. Melhem re settlement document package and line loss factors used in filing /PUCT-Settlement Activities.										

	09/15/2022	Fee	L160 Settlement/Non-Binding ADR	Stephanie Green,	245.00	0.20	3.43	0.00	0.00	45.57	Comments to Requestor: 7% discount to vendor fees per billing discount agreement
24	09/15/2022	Activity: A106 Communicate (with client) Description: Settlement/Non-binding ADR Communicate with client P. Osterloh re confirmation of line loss calculation /PUCT-Settlement Activities.	Adjustment: 10/13/2022 - Amount adjusted by 3.43 - system, system Reason for Adjustment: Discount Agreement	Comments to Requestor: 7% discount to vendor fees per billing discount agreement							
	09/15/2022	Fee	L160 Settlement/Non-Binding ADR	Stephanie Green,	245.00	0.10	1.72	0.00	0.00	22.78	
25	09/15/2022	Activity: A108 Communicate (other external) Description: Settlement/Non-binding ADR Communicate with other external E. D'Ambrosio re settlement documents /PUCT-Settlement Activities.	Adjustment: 10/13/2022 - Amount adjusted by 1.72 - system, system Reason for Adjustment: Discount Agreement	Comments to Requestor: 7% discount to vendor fees per billing discount agreement							
	09/15/2022	Fee	L160 Settlement/Non-Binding ADR	Stephanie Green,	245.00	0.10	1.72	0.00	0.00	22.78	
26	09/15/2022	Activity: A106 Communicate (with client) Description: Settlement/Non-binding ADR Communicate with client L. Melhem et al. re line loss calculation confirmation and circulation of settlement documents to parties /PUCT-Settlement Activities.	Adjustment: 10/13/2022 - Amount adjusted by 5.14 - system, system Reason for Adjustment: Discount Agreement	Comments to Requestor: 7% discount to vendor fees per billing discount agreement							
	09/15/2022	Fee	L160 Settlement/Non-Binding ADR	Stephanie Green,	245.00	0.30	5.14	0.00	0.00	68.36	
27	09/15/2022	Activity: A108 Communicate (other external) Description: Settlement/Non-binding ADR Communicate with other external parties re settlement documents for review and approval /PUCT-Settlement Activities.	Adjustment: 10/13/2022 - Amount adjusted by 6.86 - system, system Reason for Adjustment: Discount Agreement	Comments to Requestor: 7% discount to vendor fees per billing discount agreement							
	09/15/2022	Fee	L160 Settlement/Non-Binding ADR	Stephanie Green,	245.00	0.40	6.86	0.00	0.00	91.14	
28	09/19/2022	Activity: A104 Review/analyze Description: Settlement/Non-binding ADR Review/Analyze correspondence from R. Dubberstein re settlement documents /PUCT-Settlement Activities.	Adjustment: 10/13/2022 - Amount adjusted by 1.72 - system, system Reason for Adjustment: Discount Agreement	Comments to Requestor: 7% discount to vendor fees per billing discount agreement							
	09/19/2022	Fee	L160 Settlement/Non-Binding ADR	Stephanie Green,	245.00	0.10	1.72	0.00	0.00	22.78	
29	09/20/2022	Activity: A106 Communicate (with client) Description: Settlement/Non-binding ADR Communicate with client P. Osterloh re status of settlement /PUCT-Settlement Activities.	Adjustment: 10/13/2022 - Amount adjusted by 1.72 - system, system Reason for Adjustment: Discount Agreement	Comments to Requestor: 7% discount to vendor fees per billing discount agreement							
	09/20/2022	Fee	L160 Settlement/Non-Binding ADR	Stephanie Green,	245.00	0.10	1.72	0.00	0.00	22.78	
30	09/21/2022	Activity: A108 Communicate (other external) Description: Settlement/Non-binding ADR Communicate with other external E. D'Ambrosio re settlement documents /PUCT-Settlement Activities.	Adjustment: 10/13/2022 - Amount adjusted by 1.72 - system, system Reason for Adjustment: Discount Agreement	Comments to Requestor: 7% discount to vendor fees per billing discount agreement							
	09/23/2022	Fee	L160 Settlement/Non-Binding ADR	Stephanie Green,	245.00	0.10	1.72	0.00	0.00	22.78	
31	09/23/2022	Activity: A108 Communicate (other external) Description: Settlement/Non-binding ADR Communicate with other external J. Harrison re status of settlement /PUCT-Settlement Activities.	Adjustment: 10/13/2022 - Amount adjusted by 1.72 - system, system Reason for Adjustment: Discount Agreement	Comments to Requestor: 7% discount to vendor fees per billing discount agreement							
	09/23/2022	Fee	L160 Settlement/Non-Binding ADR	Stephanie Green,	245.00	0.10	1.72	0.00	0.00	22.78	

		Activities.								
		Adjustment: 10/13/2022 - Amount adjusted by 1.72 - system, system								
		Reason for Adjustment: Discount Agreement								
		Comments to Requestor: 7% discount to vendor fees per billing discount agreement								
	09/23/2022	Fee	L160 Settlement/Non-Binding ADR	Green, Stephanie	245.00	0.20	3.43	0.00	0.00	45.57
33	Activity: A106 Communicate (with client)									
	Description: Settlement/Non-binding ADR Communicate with client P. Osterloh and D. Trevino re Staff settlement schedule questions /PUCT-Settlement Activities.									
	Adjustment: 10/13/2022 - Amount adjusted by 3.43 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 7% discount to vendor fees per billing discount agreement									
	09/25/2022	Fee	L160 Settlement/Non-Binding ADR	Green, Stephanie	245.00	0.10	1.72	0.00	0.00	22.78
34	Activity: A104 Review/analyze									
	Description: Settlement/Non-binding ADR Review/Analyze issues re settlement status /PUCT-Settlement Activities.									
	Adjustment: 10/13/2022 - Amount adjusted by 1.72 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 7% discount to vendor fees per billing discount agreement									
	09/25/2022	Fee	L160 Settlement/Non-Binding ADR	Green, Stephanie	245.00	0.40	6.86	0.00	0.00	91.14
35	Activity: A106 Communicate (with client)									
	Description: Settlement/Non-binding ADR Communicate with client L. Melhem et al. re settlement documents and proposed revisions from parties /PUCT-Settlement Activities.									
	Adjustment: 10/13/2022 - Amount adjusted by 6.86 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 7% discount to vendor fees per billing discount agreement									
	09/25/2022	Fee	L160 Settlement/Non-Binding ADR	Green, Stephanie	245.00	0.30	5.14	0.00	0.00	68.36
36	Activity: A104 Review/analyze									
	Description: Settlement/Non-binding ADR Review/Analyze proposed edits received from ARM and TEAM /PUCT-Settlement Activities.									
	Adjustment: 10/13/2022 - Amount adjusted by 5.14 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 7% discount to vendor fees per billing discount agreement									
	09/26/2022	Fee	L160 Settlement/Non-Binding ADR	Pearsall, Patrick	370.00	0.50	12.95	0.00	0.00	172.05
37	Activity: A104 Review/analyze									
	Description: Settlement/Non-binding ADR Review/Analyze Staff and Intervenor's proposed edits to settlement package and response to same /PUCT-Settlement Activities.									
	Adjustment: 10/13/2022 - Amount adjusted by 12.95 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 7% discount to vendor fees per billing discount agreement									
	09/26/2022	Fee	L160 Settlement/Non-Binding ADR	Pearsall, Patrick	370.00	0.20	5.18	0.00	0.00	68.82
38	Activity: A106 Communicate (with client)									
	Description: Settlement/Non-binding ADR Communicate with client L. Melhem re Staff and Intervenor's proposed edits to settlement package /PUCT-Settlement Activities.									
	Adjustment: 10/13/2022 - Amount adjusted by 5.18 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 7% discount to vendor fees per billing discount agreement									
	09/26/2022	Fee	L160 Settlement/Non-Binding ADR	Green, Stephanie	245.00	0.30	5.14	0.00	0.00	68.36
39	Activity: A108 Communicate (other external)									
	Description: Settlement/Non-binding ADR Communicate with other external J. Harrison and S. Patel re Staff's approval of settlement documents /PUCT-Settlement Activities.									
	Adjustment: 10/13/2022 - Amount adjusted by 5.14 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 7% discount to vendor fees per billing discount agreement									
	09/26/2022	Fee	L160 Settlement/Non-Binding ADR	Green, Stephanie	245.00	0.30	5.14	0.00	0.00	68.36
40	Activity: A106 Communicate (with client)									
	Description: Settlement/Non-binding ADR Communicate with client P. Osterloh and D. Trevino to confirm Schedule data /PUCT-Settlement Activities.									
	Adjustment: 10/13/2022 - Amount adjusted by 5.14 - system, system Reason for Adjustment: Discount Agreement									

50	Adjustment: 10/13/2022 - Amount adjusted by 3.43 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 7% discount to vendor fees per billing discount agreement										
	09/27/2022	Fee	L160 Settlement/Non-Binding ADR	Green, Stephanie	245.00	0.40	6.86	0.00	0.00		91.14
51	Activity: A103 Draft/revise Description: Settlement/Non-binding ADR Draft/Revise status report /PUCT-Settlement Activities. Adjustment: 10/13/2022 - Amount adjusted by 6.86 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 7% discount to vendor fees per billing discount agreement										
	09/27/2022	Fee	L160 Settlement/Non-Binding ADR	Green, Stephanie	245.00	0.60	10.29	0.00	0.00		136.71
	Activity: A108 Communicate (other external) Description: Settlement/Non-binding ADR Communicate with other external parties re filing status report in anticipation of filing settlement documents with Staff affidavits /PUCT-Settlement Activities. Adjustment: 10/13/2022 - Amount adjusted by 10.29 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 7% discount to vendor fees per billing discount agreement										

Completed Requests

Item	Request Name	Requestor	Request Date	Completion Date	Comment	Outcome
1	Post Invoice for 4,088.26 USD	Duggins Wren Mann & Romero, LLP	10/13/2022	10/14/2022		Approved
	Approval History					
	Stop	Performer	Activity	Date/Time	Internal Comment	
	1	Melhem, Leila	Approved	10/14/2022 10:51 AM		

			Adjustment: 11/11/2022 - Amount adjusted by 3.43 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 7% discount to vendor fees per billing discount agreement								
7	10/06/2022	Fee	L160 Settlement/Non-Binding ADR	Pearsall, Patrick	370.00	0.20	5.18	0.00	0.00		68.82
	Activity: A104 Review/analyze Description: Settlement/Non-binding ADR Review/Analyze issues re finalizing and filing settlement package /PUCT-Settlement Activities. Adjustment: 11/11/2022 - Amount adjusted by 5.18 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 7% discount to vendor fees per billing discount agreement										
8	10/07/2022	Fee	L160 Settlement/Non-Binding ADR	Green, Stephanie	245.00	0.60	10.29	0.00	0.00		136.71
	Activity: A104 Review/analyze Description: Settlement/Non-binding ADR Review/Analyze prepare and finalize settlement package for filing /PUCT-Settlement Activities. Adjustment: 11/11/2022 - Amount adjusted by 10.29 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 7% discount to vendor fees per billing discount agreement										
9	10/07/2022	Fee	L160 Settlement/Non-Binding ADR	Pearsall, Patrick	370.00	0.30	7.77	0.00	0.00		103.23
	Activity: A104 Review/analyze Description: Settlement/Non-binding ADR Review/Analyze issues re final settlement package and motion to remand /PUCT-Settlement Activities. Adjustment: 11/11/2022 - Amount adjusted by 7.77 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 7% discount to vendor fees per billing discount agreement										
10	10/07/2022	Fee	L160 Settlement/Non-Binding ADR	Pearsall, Patrick	370.00	0.10	2.59	0.00	0.00		34.41
	Activity: A104 Review/analyze Description: Settlement/Non-binding ADR Review/Analyze Staff memorandum in support of stipulation /PUCT-Settlement Activities. Adjustment: 11/11/2022 - Amount adjusted by 2.59 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 7% discount to vendor fees per billing discount agreement										
11	10/24/2022	Fee	L160 Settlement/Non-Binding ADR	Pearsall, Patrick	370.00	0.20	5.18	0.00	0.00		68.82
	Activity: A104 Review/analyze Description: Settlement/Non-binding ADR Review/Analyze issues re provision of workpapers supporting application, EEPR, and stipulation /PUCT-Settlement Activities Adjustment: 11/11/2022 - Amount adjusted by 5.18 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 7% discount to vendor fees per billing discount agreement										
12	10/24/2022	Fee	L160 Settlement/Non-Binding ADR	Pearsall, Patrick	370.00	0.10	2.59	0.00	0.00		34.41
	Activity: A106 Communicate (other external) Description: Settlement/Non-binding ADR Communicate with other external M. Hovenkamp re request for native versions of workpapers /PUCT-Settlement Activities. Adjustment: 11/11/2022 - Amount adjusted by 2.59 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 7% discount to vendor fees per billing discount agreement										
13	10/24/2022	Fee	L160 Settlement/Non-Binding ADR	Green, Stephanie	245.00	0.20	3.43	0.00	0.00		45.57
	Activity: A104 Review/analyze Description: Settlement/Non-binding ADR Review/Analyze issues re M. Hovenkamp request related to schedules and tables of EECRF filing /PUCT-Settlement Activities. Adjustment: 11/11/2022 - Amount adjusted by 3.43 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 7% discount to vendor fees per billing discount agreement										
14	10/26/2022	Fee	L160 Settlement/Non-Binding ADR	Green, Stephanie	245.00	0.10	1.72	0.00	0.00		22.78
	Activity: A106 Communicate (with client) Description: Settlement/Non-binding ADR Communicate with client P. Osterloh and R. Cavazos re OPDM request /PUCT-Settlement Activities. Adjustment: 11/11/2022 - Amount adjusted by 1.72 - system, system Reason for Adjustment: Discount Agreement										

[illegible]

Adjustment: 11/11/2022 - Amount adjusted by 3.43 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 7% discount to vendor fees per billing discount agreement											
24	10/31/2022	Fee	L160 Settlement/Non-Binding ADR	Green, Stephanie	245.00	0.20	3.43	0.00	0.00		45.57
	Activity: A108 Communicate (other external) Description: Settlement/Non-binding ADR Communicate with other external M. Hovenkamp re OPDM request for information /PUCT-Settlement Activities.										
	Adjustment: 11/11/2022 - Amount adjusted by 3.43 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 7% discount to vendor fees per billing discount agreement										
25	10/31/2022	Fee	L160 Settlement/Non-Binding ADR	Green, Stephanie	245.00	0.10	1.72	0.00	0.00		22.78
	Activity: A106 Communicate (with client) Description: Settlement/Non-binding ADR Communicate with client L. Melhem re OPDM request for information /PUCT-Settlement Activities										
	Adjustment: 11/11/2022 - Amount adjusted by 1.72 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 7% discount to vendor fees per billing discount agreement										

Completed Requests

Item	Request Name	Requestor	Request Date	Completion Date	Comment	Outcome
1	Post Invoice for 1,598.67 USD	Duggins Wren Mann & Romero, LLP	11/11/2022	11/15/2022		Approved
	Approval History					
	Stop	Performer	Activity	Date/Time	Internal Comment	
	1	Melhem, Leila	Approved	11/15/2022 11:28 AM		

Header Information

Invoice Number: 38921

Vendor: Duggins Wren Mann & Romero, LLP

Address: 600 Congress Ave Suite 1900, Austin, TX, 78701, United States of America

Tax ID: 27-5110427

Invoice Date: 12/12/2022

Received Date: 12/12/2022

Project: AEP062032-AEP Texas 2022 EECRF - PUCT Docket No. 53679

Posting Status: Posted

Billing Start Date: 11/02/2022

Billing End Date: 11/30/2022

Submitted Total: \$1240.50

Submitted Currency: USD

Tax Rate: 0.00%

PS Voucher: 00341475

Approved Total: \$1153.63

Invoice Summary

Type	Rate x Units	Discount	AEP Disc	Adjustment	AEP Split	Tax	Amount
Fees	1240.50	0.00	86.87	0.00	0.00	0.00	1153.63
Expenses	0.00	0.00	N/A	0.00	0.00	0.00	0.00
Invoice Total	1240.50	0.00	86.87	0.00	0.00	0.00	1153.63

Line Items

Item	Date	Type	Category	TK	Rate	Units	AEP Disc	Disc	Adj	AEP Split	Amt
1	11/02/2022	Fee	L120 Analysis/Strategy	Green, Stephanie	245.00	0.20	3.43	0.00	0.00		45.57
Activity: A104 Review/analyze Description: Analysis/Strategy Review/Analyze status of matter and rule provisions concerning timing for decision and effective date for tariff /PUCT-Overall Case Strategy. Adjustment: 12/12/2022 - Amount adjusted by 3.43 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 7% discount to vendor fees per billing discount agreement											
2	11/03/2022	Fee	L120 Analysis/Strategy	Pearsall, Patrick	370.00	0.20	5.18	0.00	0.00		68.82
Activity: A104 Review/analyze Description: Analysis/Strategy Review/Analyze issues re timing of order and open meeting consideration /PUCT-Overall Case Strategy. Adjustment: 12/12/2022 - Amount adjusted by 5.18 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 7% discount to vendor fees per billing discount agreement											
3	11/04/2022	Fee	L120 Analysis/Strategy	Pearsall, Patrick	370.00	0.10	2.59	0.00	0.00		34.41
Activity: A104 Review/analyze Description: Analysis/Strategy Review/Analyze SOAH Order No. 4 admitting evidence and remanding case to Commission /PUCT-Overall Case Strategy. Adjustment: 12/12/2022 - Amount adjusted by 2.59 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 7% discount to vendor fees per billing discount agreement											
4	11/04/2022	Fee	L250 Other Written Motions/Submissions	Green, Stephanie	245.00	0.10	1.72	0.00	0.00		22.78
Activity: A104 Review/analyze Description: Other Written Motions and Submissions Review/Analyze SOAH Order No. 4 remanding case to Commission /PUCT-Overall Case Administration Adjustment: 12/12/2022 - Amount adjusted by 1.72 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 7% discount to vendor fees per billing discount agreement											
5	11/11/2022	Fee	L250 Other Written Motions/Submissions	Green, Stephanie	245.00	0.10	1.72	0.00	0.00		22.78
Activity: A106 Communicate (with client) Description: Other Written Motions and Submissions Communicate with client P. Osterloh re SOAH Order to remand /PUCT-Non-Discovery Pleadings and Motions Adjustment: 12/12/2022 - Amount adjusted by 1.72 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 7% discount to vendor fees per billing discount agreement											
6	11/11/2022	Fee	L250 Other Written Motions/Submissions	Green, Stephanie	245.00	0.10	1.72	0.00	0.00		22.78

[illegible]

	Activity: A106 Communicate (with client) Description: Pleadings Communicate with client litigation team re review of and potential corrections to proposed order /PUCT-Non-Discovery Pleadings and Motions. Adjustment: 12/12/2022 - Amount adjusted by 2.59 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 7% discount to vendor fees per billing discount agreement									
16	11/21/2022	Fee	L460 Post-Trial Motions and Submissions	Green, Stephanie	245.00	0.10	1.72	0.00	0.00	22.78
	Activity: A104 Review/analyze Description: Post-Trial Motions and Submissions Review/Analyze L. Melhem questions re OPDM proposed order and proposed corrections /PUCT-Non-Discovery Pleadings and Motions Adjustment: 12/12/2022 - Amount adjusted by 1.72 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 7% discount to vendor fees per billing discount agreement									
17	11/21/2022	Fee	L460 Post-Trial Motions and Submissions	Green, Stephanie	245.00	0.10	1.72	0.00	0.00	22.78
	Activity: A104 Review/analyze Description: Post-Trial Motions and Submissions Review/Analyze J. Jackson correspondence related to pending questions from L. Melhem /PUCT-Non-Discovery Pleadings and Motions. Adjustment: 12/12/2022 - Amount adjusted by 1.72 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 7% discount to vendor fees per billing discount agreement									
18	11/21/2022	Fee	L460 Post-Trial Motions and Submissions	Green, Stephanie	245.00	0.20	3.43	0.00	0.00	45.57
	Activity: A104 Review/analyze Description: Post-Trial Motions and Submissions Review/Analyze L. Melhem edits to draft proposed order corrections /PUCT-Non-Discovery Pleadings and Motions Adjustment: 12/12/2022 - Amount adjusted by 3.43 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 7% discount to vendor fees per billing discount agreement									
19	11/22/2022	Fee	L210 Pleadings	Green, Stephanie	245.00	0.20	3.43	0.00	0.00	45.57
	Activity: A104 Review/analyze Description: Pleadings Review/Analyze and finalize corrections to proposed order pleading /PUCT-Non-Discovery Pleadings and Motions. Adjustment: 12/12/2022 - Amount adjusted by 3.43 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 7% discount to vendor fees per billing discount agreement									
20	11/28/2022	Fee	L120 Analysis/Strategy	Pearsall, Patrick	370.00	0.10	2.59	0.00	0.00	34.41
	Activity: A104 Review/analyze Description: Analysis/Strategy Review/Analyze OPDM memo addressing corrections to proposed order /PUCT-Overall Case Strategy Adjustment: 12/12/2022 - Amount adjusted by 2.59 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 7% discount to vendor fees per billing discount agreement									
21	11/28/2022	Fee	L460 Post-Trial Motions and Submissions	Green, Stephanie	245.00	0.10	1.72	0.00	0.00	22.78
	Activity: A104 Review/analyze Description: Post-Trial Motions and Submissions Review/Analyze corrected Proposed Order and memo of OPDM Adjustment: 12/12/2022 - Amount adjusted by 1.72 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 7% discount to vendor fees per billing discount agreement									

Completed Requests

Item	Request Name	Requestor	Request Date	Completion Date	Comment	Outcome
1	Post Invoice for 1,153.63 USD	Duggins Wren Mann & Romero, LLP	12/12/2022	12/12/2022		Approved
Approval History						
	Stop	Performer	Activity	Date/Time	Internal Comment	
	1	Melhem, Lella	Approved	12/12/2022 04:53 PM		

Header Information

Invoice Number: 39036
Vendor: Duggins Wren Mann & Romero, LLP
Address: 600 Congress Ave Suite 1900, Austin, TX, 78701, United States of America
Tax ID: 27-5110427
Invoice Date: 01/13/2023
Received Date: 01/13/2023
Project: AEP062032-AEP Texas 2022 EECRF - PUCT Docket No. 53679
Posting Status: Posted

Billing Start Date: 12/14/2022**Billing End Date:** 12/31/2022**Submitted Total:** \$113.50**Submitted Currency:** USD**Tax Rate:** 0.00%**PS Voucher:** 00341840**Approved Total:** \$105.56

Invoice Summary

Type	Rate x Units	Discount	AEP Disc	Adjustment	AEP Split	Tax	Amount
Fees	113.50	0.00	7.94	0.00	0.00	0.00	105.56
Expenses	0.00	0.00	N/A	0.00	0.00	0.00	0.00
Invoice Total	113.50	0.00	7.94	0.00	0.00	0.00	105.56

Line Items

Item	Date	Type	Category	TK	Rate	Units	AEP Disc	Disc	Adj	AEP Split	Amt
1	12/14/2022	Fee	L250 Other Written Motions/Submissions	Green, Stephanie	245.00	0.20	3.43	0.00	0.00		45.57
	Activity: A106 Communicate (with client) Description: Other Written Motions and Submissions Communicate with client team re final order consideration and placement on consent agenda Adjustment: 01/13/2023 - Amount adjusted by 3.43 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 7% discount to vendor fees per billing discount agreement										
	12/16/2022	Fee	L250 Other Written Motions/Submissions	Jones, Jackie	155.00	0.10	1.08	0.00	0.00		14.42
	Activity: A104 Review/analyze Description: Other Written Motions and Submissions Review/Analyze final order Adjustment: 01/13/2023 - Amount adjusted by 1.08 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 7% discount to vendor fees per billing discount agreement										
3	12/19/2022	Fee	L250 Other Written Motions/Submissions	Green, Stephanie	245.00	0.20	3.43	0.00	0.00		45.57
	Activity: A104 Review/analyze Description: Other Written Motions and Submissions Review/Analyze final order and issues re filing of clean tariff Adjustment: 01/13/2023 - Amount adjusted by 3.43 - system, system Reason for Adjustment: Discount Agreement Comments to Requestor: 7% discount to vendor fees per billing discount agreement										

Completed Requests

Item	Request Name	Requestor	Request Date	Completion Date	Comment	Outcome
1	Post Invoice for 105.56 USD	Duggins Wren Mann & Romero, LLP	01/13/2023	01/13/2023		Auto-Approved
	Approval History					
	Stop	Performer	Activity		Date/Time	Internal Comment
	1	system	Auto-Approved on behalf of Melhem, Leila		01/13/2023 08:33 AM	



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

December 30, 2022

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

Re: Docket #53679; AEP Texas 2023 EECRF; Lloyd Gosselink; Inv. #97537120

Dear Ms. Gage:

Pursuant to Public Utility Regulatory Act §33.023, please remit to the City of McAllen, Texas the sum of **\$147.50** cover the fees and expenses of attorneys and consultants assisting the Steering Committee of Cities Served by AEP Texas Central Company in the above-referenced ratemaking proceeding.

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

FIRM	DOCKET	PERIOD	BILL AMOUNT
Lloyd Gosselink	53679 - AEP Texas 2023 EECRF	November 2022	\$147.50

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

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

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

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

Sincerely,

A handwritten signature in black ink, appearing to read "Isaac J. Tawil", written over a horizontal line.

Isaac J. Tawil
City Attorney

UT:av
encs.



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

December 27, 2022

Cities Served by AEP Texas Inc
c/o City of McAllen
Attn Isaac Tawil
P O Box 220
McAllen, TX USA 78505-0220

Invoice: 97537120
Client: 3862
Matter: 13
Billing Attorney: JLM

Tax ID# 74-2308445

INVOICE SUMMARY

For professional services and disbursements rendered through November 30, 2022:

RE: AEP Texas 2023 EECRF Filing Dkt No 53679

Professional Services	\$ 147.50
Total Disbursements	<u>\$.00</u>
TOTAL THIS INVOICE	\$147.50

Lloyd Gosselink Rochelle & Townsend, P.C.

Cities Served by AEP Texas Inc
AEP Texas 2023 EECRF Filing Dkt No 53679
I.D.3862-13-JLM

December 27, 2022
Invoice: 97537120

PROFESSIONAL SERVICES RENDERED

Date	Atty	Description Of Services Rendered	Hours
11/16/22	RMD	Review proposed order for possible corrections and exceptions. (Administration/Case Management)	.50

TOTAL PROFESSIONAL SERVICES **\$ 147.50**

SUMMARY OF PROFESSIONAL SERVICES

Name	Staff Level	Hours	Rate	Total
Roslyn M Dubberstein	Associate	.50	295.00	147.50
TOTALS		.50		\$ 147.50

TOTAL THIS INVOICE **\$ 147.50**



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Austin, Texas 78701
Telephone: (512) 322-5800
Facsimile: (512) 472-0532

www.lglawfirm.com

December 27, 2022

Cities Served by AEP Texas Inc
c/o City of McAllen
Attn Isaac Tawl
P O Box220
McAllen, TX 78505-0220 USA

Client: 3862
Matter: 13
Billing Atty.: JLM

REMINDER STATEMENT

RE: AEP Texas 2023 EECRF Filing Dkt No 53679

Invoice Number	Invoice Date	Fees	Expenses	Invoice Total	Payments / Credits	Balance
97533222	July 12, 2022	1,822.50	1,237.50	3,060.00	0.00	3,060.00
97533945	August 08, 2022	1,550.00	0.00	1,550.00	0.00	1,550.00
97534699	September 12, 2022	598.00	1,182.50	1,780.50	0.00	1,780.50
97535418	October 17, 2022	265.50	0.00	265.50	0.00	265.50
Total Amount Due:						\$6,656.00

AGED ACCOUNTS RECEIVABLE

0-30 Days	31-60 Days	61-90 Days	91-120 Days	Over 120 Days
-	-	265.50	1,780.50	4,610.00

Lloyd Gosselink Rochelle & Townsend, P.C.



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

August 12, 2022

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

Re: Docket #53679; AEP Texas 2023 EECRF; Lloyd Gosselink; Inv. #97533945

Dear Ms. Gage:

Pursuant to Public Utility Regulatory Act §33.023, please remit to the City of McAllen, Texas the sum of \$1,550.00 cover the fees and expenses of attorneys and consultants assisting the Steering Committee of Cities Served by AEP Texas Central Company in the above-referenced ratemaking proceeding.

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

FIRM	DOCKET	PERIOD	BILL AMOUNT
Lloyd Gosselink	53679- AEP Texas 2023 EECRF	July 2022	\$1,550.00

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

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

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

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

Sincerely,

A handwritten signature in dark ink, appearing to read "Isaac J. Tawil", written over a horizontal line.

Isaac J. Tawil
City Attorney

UT:av
encs.



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

August 9, 2022

Cities Served by AEP Texas Inc
c/o City of McAllen
Attn Isaac Tawil
P O Box 220
McAllen, TX USA 78505-0220

Invoice: 97533945
Client: 3862
Matter: 13
Billing Attorney: JLM

Tax ID# 74-2308445

INVOICE SUMMARY

For professional services and disbursements rendered through July 31, 2022:

RE: AEP Texas 2023 EECRF Filing Dkt No 53679

Professional Services	\$1,550.00
Total Disbursements	<u>\$.00</u>
TOTAL THIS INVOICE	\$ 1,550.00

Lloyd Gosselink Rochelle & Townsend, P.C.

Lloyd Gosselink Rochelle & Townsend, P.C.

Cities Served by AEP Texas Inc
 AEP Texas 2023 EECRF Filing Dkt No 53679
 I.D.3862-13-JLM

August 9, 2022
 Invoice: 97533945

PROFESSIONAL SERVICES RENDERED

Date	Atty	Description Of Services Rendered	Hours
7/19/22	RMD	Correspondence with K. Nalepa regarding proposed adjustments; review procedural schedule; confer with AEP counsel regarding settlement conference. (Administration/Case Management; Settlement)	.60
7/21/22	RMD	Confer with J. Mauldin regarding settlement conference logistics and request for hearing deadline. (Administration/Case Management)	.20
7/25/22	JLM	Confer with co-counsel on status of proceeding; approve affidavit supporting rate case expenses (Administration).	.90
7/25/22	RMD	Settlement conference; review rate case expense information in AEP's application; coordinate with P. Martinez to prepare rate case expense affidavit; review and file the same; confer with J. Mauldin regarding adjustments and procedural schedule. (Administration/Case Management; Settlement)	1.00
7/28/22	JLM	Prepare for call with AEP's counsel regarding proposed adjustments; call with counsel regarding same; follow-up correspondence (Administration).	.60
7/28/22	RMD	Confer with AEP counsel regarding counteroffer to Cities' proposed adjustments. (Administration/Case Management; Settlement)	.20
7/29/22	JLM	Analyze AEP's second errata; review proposed settlement language for REPs; engage in settlement discussions (Administration).	.90

TOTAL PROFESSIONAL SERVICES**\$ 1,550.00****SUMMARY OF PROFESSIONAL SERVICES**

Name	Staff Level	Hours	Rate	Total
Jamie L. Mauldin	Principal	2.40	400.00	960.00
Roslyn M. Dubberstein	Associate	2.00	295.00	590.00
TOTALS		4.40		\$1,550.00

TOTAL THIS INVOICE**\$1,550.00**



CITY ATTORNEY'S OFFICE

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

July 20, 2022

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

Re: Docket #53679; AEP Texas 2023 EECRF; Lloyd Gosselink; Inv. #97533222

Dear Ms. Gage:

Pursuant to Public Utility Regulatory Act §33.023, please remit to the City of McAllen, Texas the sum of \$3,060.00 cover the fees and expenses of attorneys and consultants assisting the Steering Committee of Cities Served by AEP Texas Central Company in the above-referenced ratemaking proceeding.

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

FIRM	DOCKET	PERIOD	BILL AMOUNT
Lloyd Gosselink	53679 - AEP Texas 2023 EECRF	June 2022	\$3,060.00

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

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

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

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

Sincerely,

Isaac L. Tawil
 City Attorney

IJT:av
 encls.



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

July 12, 2022

Cities Served by AEP Texas Inc
c/o City of McAllen
Attn Isaac Tawil
P O Box 220
McAllen, TX USA 78505-0220

Invoice: 97533222
Client: 3862
Matter: 13
Billing Attorney: JLM

Tax ID # 74-2308445

INVOICE SUMMARY

For professional services and disbursements rendered through June 30, 2022:

RE: AEP Texas 2023 EECRF Filing Dkt No ⁵³⁶⁷⁹52199

Professional Services	\$1,822.50
Total Disbursements	<u>\$1,237.50</u>
TOTAL THIS INVOICE	\$3,060.00

Lloyd Gosselink Rochelle & Townsend, P.C.

Cities Served by AEP Texas Inc 53619
 AEP Texas 2023 EECRF Filing Dkt No 52199-
 I.D.3862-13-JLM

July 12, 2022
 Invoice: 97533222

PROFESSIONAL SERVICES RENDERED

Date	Atty	Description Of Services Rendered	Hours
6/03/22	RMD	Draft engagement agreement for K. Nalepa; draft motion to intervene. (Administration/Case Management)	.40
6/06/22	RMD	Draft client correspondence outlining key terms of filing; confer with J. Mauldin regarding the same. (Administration/Case Management)	.70
6/08/22	RMD	Confer with J. Mauldin regarding city members; finalize and file motion to intervene. (Administration/Case Management)	.60
6/14/22	JLM	Call with K. Nalepa and co-counsel to discuss issues (Administration).	.10
6/14/22	RMD	Confer with J. Mauldin and K. Nalepa regarding proposed adjustments. (Administration/Case Management)	.20
6/16/22	RMD	Finalize first request for information and approve for filing; coordinate with K. Chambers regarding protective order certifications. (Administration/Case Management; Discovery)	.60
6/20/22	RMD	Review and approve protective order certifications for filing; coordinate calendaring of discovery deadlines. (Administration/Case Management)	.50
6/22/22	RMD	Review proposed procedural schedule and confer with K. Nalepa regarding the same. (Administration/Case Management)	.30
6/23/22	RMD	Correspondence with AEP counsel regarding proposed procedural schedule. (Administration/Case Management)	.20
6/26/22	RMD	Correspondence with AEP and intervenors regarding proposed procedural schedule. (Administration/Case Management)	.40
6/27/22	RMD	Prehearing conference; correspondence with SOAH regarding technical issues. (Administration/Case Management)	1.40
6/30/22	JLM	Confer with co-counsel on status of proceeding; review correspondence regarding same (Administration).	.40
6/30/22	RMD	Confer with J. Mauldin regarding correspondence with AEP and intervenors. (Administration/Case Management)	.20

TOTAL PROFESSIONAL SERVICES**\$1,822.50****SUMMARY OF PROFESSIONAL SERVICES**

Name	Staff Level	Hours	Rate	Total
Jamie L Mauldin	Principal	.50	400.00	200.00
Roslyn M Dubberstein	Associate	5.50	295.00	1,622.50
TOTALS		6.00		\$1,822.50

DISBURSEMENTS

Lloyd Gosselink Rochelle & Townsend, P.C.

Cities Served by AEP Texas Inc 53619
AEP Texas 2023 EECRF Filing Dkt No 52199
I.D.3862-13-JLM

July 12, 2022
Invoice: 97533222

Date	Description	Amount
6/30/22	ReSolved Energy Cons Voucher#- 000113755 ReSolved Energy Consulting, LLC, Consultant Services, Professional services for June regarding AEP 22 EECRF 53679, 7/7/2022	1,237.50

TOTAL DISBURSEMENTS \$1,237.50

TOTAL THIS INVOICE \$3,060.00

ReSolved Energy Consulting, LLC

11044 Research Blvd, A-420
Austin, TX 78759

Invoice

DATE	INVOICE NUMBER
7/7/2022	5052

BILL TO

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

PROJECT

LG AEP 22 EECRF 53679

DESCRIPTION	HOURS	RATE	AMOUNT
Consulting (Nalepa)	4.5	275.00	1,237.50
Work Completed thru - June 30, 2022		TOTAL DUE	\$1,237.50

Monthly Recap

Karl Nalepa

Date	Task	Hours
June 9, 2022	Review filing and identify issues. Compile historical costs.	2.20
June 14, 2022	Prepare discovery. Call with Counsel to discuss issues.	1.30
June 15, 2022	Complete and send discovery to J. Mauldin for review.	0.50
June 27, 2022	Review errata and impacts.	0.50
		4.50



CITY ATTORNEY'S OFFICE

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

September 19, 2022

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

Re: Docket #53679; AEP Texas 2023 EECRF; Lloyd Gosselink; Inv. #97534699

Dear Ms. Gage:

Pursuant to Public Utility Regulatory Act §33.023, please remit to the City of McAllen, Texas the sum of **\$1,780.50** cover the fees and expenses of attorneys and consultants assisting the Steering Committee of Cities Served by AEP Texas Central Company in the above-referenced ratemaking proceeding.

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

FIRM	DOCKET	PERIOD	BILL AMOUNT
Lloyd Gosselink	53679- AEP Texas 2023 EECRF	August 2022	\$1,780.50


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

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

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

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

Sincerely,


 Isaac J. Tavel
 City Attorney

LT:av
 encls.



816 Congress Avenue, Suite 1900
Austin, Texas 78701
Telephone: (512) 322-5900
Facsimile: (512) 472-0332
www.lglawfirm.com

September 12, 2022

Cities Served by AEP Texas Inc
c/o City of McAllen
Attn Isaac Tawil
P O Box 220
McAllen, TX USA 78505-0220

Invoice: 97534699
Client: 3862
Matter: 13
Billing Attorney: JLM

Tax ID# 74-2308445

INVOICE SUMMARY

For professional services and disbursements rendered through August 31, 2022:

RE: AEP Texas 2023 EECRF Filing Dkt No 53679

Professional Services	\$ 598.00
Total Disbursements	<u>\$1,182.50</u>
TOTAL THIS INVOICE	\$1,780.50

Lloyd Gosselink Rochelle & Townsend, P.C.

Cities Served by AEP Texas Inc
 AEP Texas 2023 EECRF Filing Dkt No 53679
 I.D.3862-13-JLM

September 12, 2022
 Invoice: 97534699

PROFESSIONAL SERVICES RENDERED

Date	Atty	Description Of Services Rendered	Hours
8/01/22	JLM	Calls and correspondence with AEP Texas regarding settlement of City issues; calls and correspondence with K. Nalepa regarding same (Administration).	.80
8/02/22	JLM	Review draft order requesting abatement; attend to client correspondence (Administration).	.40
8/02/22	RMD	Draft client correspondence detailing settlement agreement; review and approve joint motion to abate. (Administration/Case Management; Settlement)	.40

TOTAL PROFESSIONAL SERVICES **\$ 598.00**

SUMMARY OF PROFESSIONAL SERVICES

Name	Staff Level	Hours	Rate	Total
Jamie L Mauldin	Principal	1.20	400.00	480.00
Roslyn M Dubberstein	Associate	.40	295.00	118.00
TOTALS		1.60		\$ 598.00

DISBURSEMENTS

Date	Description	Amount
7/31/22	ReSolved Energy Cons Voucher # - 000114111 ReSolved Energy Consulting, LLC, Consultant Services, Professional services for July regarding AEP 22 EECRF 53679, 08/08/2022	962.50
8/31/22	ReSolved Energy Cons Voucher # - 000114526 ReSolved Energy Consulting, LLC, Consultant Services, Professional services for August regarding AEP 22 EECRF 53679, 09/06/2022	220.00

TOTAL DISBURSEMENTS **\$1,182.50**

TOTAL THIS INVOICE **\$ 1,780.50**

ReSolved Energy Consulting, LLC

11044 Research Blvd, A-420
Austin, TX 78759

Invoice

DATE	INVOICE NUMBER
8/8/2022	5077

BILL TO

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

PROJECT

LQ AEP 22 EECRF 53679

DESCRIPTION	HOURS	RATE	AMOUNT
Consulting (NALEPA)	3.5	275.00	962.50
Work Completed thru - July 31, 2022	TOTAL DUE		\$962.50

Monthly Recap

Kari Nalepa

Date	Task	Hours
July 7, 2022	Review responses to discovery.	0.50
July 18, 2022	Work on adjustments.	0.50
July 19, 2022	Complete and send proposed adjustments to R. Dubberstein.	1.00
July 20, 2022	Review responses to discovery.	0.50
July 25, 2022	Participate in settlement conference call. Send workpaper supporting Cities' adjustments to R. Dubberstein.	0.70
July 28, 2022	Emails with J. Mauldin regarding settlement offer and response.	0.30
		3.50

ReSolved Energy Consulting, LLC

11044 Research Blvd, A-420
Austin, TX 78759

Invoice

DATE	INVOICE NUMBER
9/6/2022	5095

BILL TO

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

PROJECT

LG AEP 22 EECRF 53679

DESCRIPTION	HOURS	RATE	AMOUNT
Consulting (Nalepa)	0.8	275.00	220.00
Work Completed thru - August 31. 2022	TOTAL DUE		\$220.00

Monthly Recap

Karl Nalepa

Date	Task	Hours
August 1, 2022	Review emails and call with J. Mauldin to discuss settlement terms.	0.50
August 4, 2022	Review responses to discovery.	0.30
		0.80



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Austin, Texas 78701
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September 12, 2022

Cities Served by AEP Texas Inc
c/o City of McAllen
Attn Isaac Tawil
P O Box 220
McAllen, TX 78505-0220 USA

Client: 3862
Matter: 13
Billing Atty: JLM

REMINDER STATEMENT

RE: AEP Texas 2023 EECRF Filing Dkt No 53679

Invoice Number	Invoice Date	Fees	Expenses	Invoice Total	Payments / Credits	Balance
97533222	July 12, 2022	1,822.50	1,237.50	3,060.00	0.00	3,060.00
97533945	August 09, 2022	1,550.00	0.00	1,550.00	0.00	1,550.00
Total Amount Due:						\$4,610.00

AGED ACCOUNTS RECEIVABLE

0-30 Days	31-60 Days	61-90 Days	91-120 Days	Over 120 Days
-	1,550.00	3,060.00	-	-

Lloyd Gosselink Rochelle & Townsend, P.C.

PUBLIC UTILITY COMMISSION OF TEXAS

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

**DIRECT TESTIMONY OF
PAMELA D. OSTERLOH
FOR
AEP TEXAS INC.**

JUNE 1, 2023

TESTIMONY INDEX

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1 I. INTRODUCTION

2 Q. PLEASE STATE YOUR NAME, POSITION IN THE COMPANY, AND BUSINESS
3 ADDRESS.

4 A. My name is Pamela D. Osterloh. I am the Energy Efficiency and Consumer Programs
5 Compliance Coordinator Principal for AEP Texas Inc. My business address is 539 N.
6 Carancahua, Corpus Christi, Texas 78401.

7 Q. PLEASE STATE YOUR EDUCATIONAL AND PROFESSIONAL BACKGROUND.

8 A. I received a Bachelor of Science degree from Texas A&M University in 1986. I was
9 first employed by and worked in various capacities and locations for Central Power and
10 Light Company (the predecessor of AEP Texas Central Company) from April 1990
11 through May 1992. In June 1992, I accepted the position of Market Research Analyst
12 with West Texas Utilities Company (the predecessor of AEP Texas North Company).
13 In September 1997, I was appointed Demand Side Management (DSM) Resource
14 Evaluation Coordinator with Central and South West Services, Inc. (the corporate
15 service affiliate of Central and South West Corporation or CSW) located in Austin,
16 Texas. In that role, I was responsible for energy efficiency regulatory activities and
17 compliance for DSM activities for CSW in Texas. In April 1999, I transferred to Corpus
18 Christi with CSW and began work in my current role as Energy Efficiency and
19 Consumer Program Compliance Coordinator Principal for AEP Texas. In my current
20 position, I am responsible for implementing and administering energy efficiency
21 programs in compliance with the Public Utility Regulatory Act¹ (PURA) provisions

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

1 and the Public Utility Commission of Texas (Commission) rules for such energy
2 efficiency programs. I hold professional certification from the Association of Energy
3 Engineers (AEE) as a Certified Energy Manager.

4 Q. HAVE YOU PREVIOUSLY FILED TESTIMONY BEFORE ANY REGULATORY
5 AGENCY?

6 A. Yes, I have previously filed testimony before the Commission in numerous energy
7 efficiency cost recovery factor (EECRF) dockets: Docket No. 35627; Docket
8 No. 36960; Docket No. 38208; Docket No. 39360; Docket No. 40359; Docket No.
9 41538; Docket No. 42508; Docket No. 44717; Docket No. 45929; Docket No. 47236;
10 Docket No. 48422; Docket No. 49592; Docket No. 50892; Docket No. 52199, and
11 Docket No. 53679.

12 Q. DO YOU SPONSOR ANY OF THE SCHEDULES ACCOMPANYING AEP
13 TEXAS' FILING?

14 A. Yes, I sponsor AEP Texas Schedules L through O, and R. In addition, I co-sponsor
15 Schedule A with witnesses Robert Cavazos and Jennifer L. Jackson; Schedule B with
16 witness Jackson; and Schedules J, P, and S with witness Cavazos.

1 II. PURPOSE OF TESTIMONY

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

3 A. The purpose of my testimony is to present information supporting AEP Texas' request
4 to adjust its EECRF for program year (PY) 2024. In my direct testimony, I first outline
5 the energy efficiency goals established by PURA § 39.905. I also discuss the impact of
6 the identification notice provided for in 16 Tex. Admin. Code (TAC) § 25.181(u). I
7 then present the actual energy efficiency expenditures incurred by AEP Texas for its
8 PY 2022 programs, including Evaluation, Measurement and Verification (EM&V)
9 costs incurred in PY 2022. I describe each of the programs AEP Texas implemented
10 during PY 2022. Finally, I present the projected costs and the plans and programs AEP
11 Texas will implement to achieve its energy efficiency objectives for PY 2024.

12 Q. PLEASE SUMMARIZE YOUR TESTIMONY.

13 A. My testimony demonstrates the following:

- 14 • AEP Texas' costs incurred in connection with its PY 2022 energy efficiency
15 programs were reasonable and necessary to provide energy efficiency to
16 residential and commercial customers and were properly incurred consistent
17 with 16 TAC §§ 25.181 and 25.182;
- 18 • AEP Texas' statutory minimum goals to be achieved in PY 2024 are 21.55 MW
19 of demand reduction and 37,756 MWh of energy reduction and are calculated
20 in compliance with 16 TAC § 25.181; and
- 21 • The \$18,927,908 that AEP Texas projects it will incur in PY 2024 is a
22 reasonable estimate of the costs (including EM&V) necessary to provide energy
23 efficiency programs designed to meet AEP Texas' energy efficiency objectives
24 for PY 2024 in furtherance of PURA § 39.905 and 16 TAC § 25.181.

1 III. ENERGY EFFICIENCY REQUIREMENTS AND OBJECTIVES

2 A. Statutory and Regulatory Requirements

3 Q. PLEASE DESCRIBE THE BASIC REQUIREMENTS OF PURA § 39.905 AS
4 RELEVANT TO YOUR TESTIMONY.

5 A. The requirements of PURA § 39.905 as relevant to my testimony are:

- 6 • A utility must provide incentives adequate for the purpose of acquiring
7 cost-effective energy efficiency equivalent to at least 30% of the electric
8 utility's annual growth in demand of residential and commercial
9 customers beginning with the 2013 program year; but not less than the
10 previous year.
- 11 • Once the utility's demand reduction goal is equivalent to at least four-
12 tenths of one percent of its summer weather-adjusted peak demand for
13 the combined residential and commercial customers for the previous
14 calendar year, the utility's goal shall be four-tenths of one percent of its
15 summer weather-adjusted peak demand for the combined residential
16 and commercial customers but not less than the previous year.
- 17 • A utility must provide incentives through market-based standard offer
18 programs (SOPs) or targeted market transformation programs (MTPs).
- 19 • A utility must provide incentives in such a manner that retail electric
20 providers (REPs) and competitive energy efficiency service providers
21 (EESPs) install the measures that produce the energy efficiency
22 necessary to meet the utility's mandated annual goal.

23 Q. HAS THE COMMISSION ADOPTED RULES TO IMPLEMENT PURA § 39.905?

24 A. Yes, the Commission adopted 16 TAC §§ 25.181 and 25.182 to implement PURA
25 § 39.905.

26 Q. WHAT ARE SOME OF THE KEY COMPONENTS OF 16 TAC §§ 25.181 and
27 25.182?

28 A. The key components of 16 TAC §§ 25.181 and 25.182 relevant to my testimony are:

- 29 • A utility shall adjust its EECRF to timely recover forecasted annual
30 energy efficiency program costs, the preceding year's over- or under-

1 recovery including municipal and utility EECRF proceeding expenses,
2 any performance bonus earned, and EM&V costs assigned to the utility.

- 3 • A utility may use up to 15% of its total program costs for administration
4 of its energy efficiency programs.
- 5 • A utility may use up to 10% of the previous program year's costs to
6 perform necessary energy efficiency research and development (R&D)
7 to foster continuous improvement and innovation in the application of
8 energy efficiency technology and energy efficiency program design and
9 implementation.
- 10 • The cumulative cost of administration and R&D shall not exceed 20%
11 of a utility's total program costs.
- 12 • An EM&V framework is included to evaluate program portfolio
13 performance and to measure and verify estimated demand and energy
14 impacts reported for those programs.
- 15 • Qualifying industrial customers taking electric service at distribution
16 voltage may submit a notice to identify metering points for their
17 industrial processes, which allows those metering points to not be
18 charged for any costs associated with programs provided through the
19 EECRF nor shall the identified facilities be eligible to participate or
20 receive incentives for a three-year period.

21 Q. HOW DOES AEP TEXAS IMPLEMENT THESE REQUIREMENTS?

22 A. AEP Texas develops and offers cost-effective energy efficiency programs to third-party
23 EESPs as defined in 16 TAC § 25.181(c)(17), who in turn market their services to end-
24 use retail residential and commercial customers. These programs offer incentives to
25 encourage third-party EESPs, REPs, and/or eligible commercial customers to
26 participate as project sponsors of energy efficiency measures. The Commission's
27 energy efficiency rule allows commercial customers with a peak demand of 50
28 kilowatts (kW) or greater to act as their own EESP for measures they install for
29 themselves. The EESPs or project sponsors then supply and install the measures at
30 homes or businesses that produce the energy efficiency savings that AEP Texas reports
31 to satisfy its energy efficiency objectives. Energy efficiency objectives and goals are

1 established annually, so that each year AEP Texas may procure the necessary demand
2 reduction and energy savings from participating project sponsors to meet AEP Texas'
3 objectives for that year. The energy efficiency savings may be in the form of reduction
4 in summer or winter peak demand (kW), energy usage (kWh), or both. AEP Texas pays
5 incentives to the project sponsors for peak demand and energy savings resulting from
6 the energy efficiency measures installed according to program guidelines.

7 Q. PLEASE DEFINE THE TERM SOP.

8 A. Pursuant to 16 TAC § 25.181(c)(55), a standard offer program is defined as a program
9 under which a utility administers standard offer contracts between the utility and
10 EESPs. A standard offer contract specifies standard payments based upon the amount
11 of energy and peak demand savings achieved through energy efficiency measures, the
12 applicable measurement and verification (M&V) protocols, and other terms and
13 conditions, consistent with 16 TAC § 25.181.

14 Q. PLEASE DEFINE THE TERM MTP.

15 A. Pursuant to 16 TAC § 25.181(c)(37), a market transformation program is defined as a
16 strategic program intended to induce lasting structural or behavioral changes in a
17 market that result in the increased adoption of energy efficiency technologies, services,
18 and practices.

19 B. Annual Demand Reduction Goal

20 Q. PLEASE DESCRIBE THE DEMAND REDUCTION GOAL REQUIREMENT FOR
21 AEP TEXAS.

22 A. Under 16 TAC § 25.181(e)(1), AEP Texas is required to acquire a 30% reduction of its
23 annual growth in demand of residential and commercial customers until that goal is

1 equivalent to at least four-tenths of 1% (the trigger) of AEP Texas summer
2 weather-adjusted peak demand for the combined residential and commercial customers
3 for the previous program year. Once that trigger is reached, AEP Texas shall acquire
4 four-tenths of 1% of its summer weather-adjusted peak demand for the combined
5 residential and commercial customers for the previous program year. In addition,
6 16 TAC § 25.181(e)(1)(D) states that, except as adjusted in accordance with subsection
7 (u) of the rule, a utility's demand reduction goal in any year shall not be lower than its
8 goal for the prior year, unless the Commission establishes a goal for a utility pursuant
9 to paragraph (2) of 16 TAC § 25.181(e).

10 Q. HAS AEP TEXAS MET THE TRIGGER DESCRIBED IN 16 TAC
11 § 25.181(e)(1)(B)?

12 A. Yes, AEP Texas has met the trigger.

13 Q. PLEASE DESCRIBE THE IDENTIFICATION NOTICE REFERENCED IN 16 TAC
14 § 25.181.

15 A. 16 TAC § 25.181(u) states that an industrial customer taking electric service at
16 distribution voltage that qualifies under subsection 16 TAC § 25.181(c)(30) may
17 submit an identification notice to the utility for those metered points of delivery of the
18 industrial process. The Electric Service Identifier (ESID) number(s) identified under
19 this section are not to be charged for any costs associated with and will not be able to
20 participate in energy efficiency programs for three years.

21 Q. COULD THE IDENTIFICATION NOTICE REQUIREMENT AFFECT THE
22 UTILITY'S CALCULATED GOAL FOR ENERGY EFFICIENCY?

1 A. Yes. Pursuant to 16 TAC § 25.181(u) the utility's demand reduction goal must be
2 adjusted to remove any load identified as a result of the identification notice provision.

3 Q. WILL ANY SUCH NOTICES BE EFFECTIVE IN PY 2024?

4 A. Yes. AEP Texas received identification notices prior to February 1, 2023, for 219
5 ESIDs representing 46.89 MW.

6 Q. WHAT IS AEP TEXAS' DEMAND REDUCTION GOAL FOR PY 2024?

7 A. AEP Texas' summer weather-adjusted five-year average peak demand at the meter for
8 residential and commercial customers for the previous five year (2018-2022) is 5,387
9 megawatts (MW), after adjustments under 16 TAC § 25.181(u) for industrial-customer
10 exclusions. AEP Texas' calculated demand reduction goal for PY 2024—i.e., four-
11 tenths of one percent of its summer weather-adjusted five-year average peak demand
12 at the meter for residential and commercial customers—is 21.55 MW. The minimum
13 PY 2024 demand reduction goal is set forth in Schedule N. AEP Texas, however,
14 projects it will achieve as much as 60.93 MW of demand reduction from the programs
15 it will implement in PY 2024. As Mr. Cavazos explains in his testimony, AEP Texas
16 interprets PURA § 39.905 and 16 TAC § 25.181 as intending to encourage as much
17 cost-effective energy efficiency as can reasonably be achieved.

18 Q. WERE LINE LOSSES INCORPORATED IN THE CALCULATION OF THE
19 DEMAND REDUCTION GOAL?

20 A. Yes. Calculation of the demand reduction goal used the line loss numbers derived from
21 the loss factors determined in AEP Texas' most recent line loss study.

1 C. Annual Energy Savings Goal

2 Q. HOW IS THE ENERGY SAVINGS GOAL CALCULATED UNDER 16 TAC
3 § 25.181?

4 A. The minimum energy savings goal is calculated from the utility's calculated demand
5 goal, using a 20% conservation load factor, as set forth in 16 TAC § 25.181(e)(4).

6 Q. WHAT IS AEP TEXAS' ENERGY SAVINGS GOAL TO BE ACHIEVED IN
7 PY 2024?

8 A. The energy savings goal for AEP Texas to achieve in PY 2024 is 37,756 megawatt-
9 hour (MWh). The PY 2024 energy savings goal is set forth in Schedule N. However,
10 AEP Texas projects to achieve as much as 76,758 MWh of energy savings from the
11 programs it will implement in PY 2024. As I mentioned above and as Mr. Cavazos
12 explains in his testimony, AEP Texas interprets PURA § 39.905 and 16 TAC § 25.181
13 as intended to encourage utilities to achieve as much cost-effective energy efficiency
14 as can reasonably be achieved.

15 D. Process to Achieve Savings

16 Q. WILL AEP TEXAS OFFER PROGRAMS TO ACHIEVE THESE PY 2024
17 SAVINGS?

18 A. Yes, I discuss the programs that AEP Texas will offer in Section V. of my testimony.
19 AEP Texas' energy efficiency program portfolio is designed to achieve both its demand
20 reduction and energy savings objectives for PY 2024.

1 Q. WILL ALL ELIGIBLE CUSTOMERS HAVE ACCESS TO ENERGY EFFICIENCY
2 PROGRAMS OFFERED BY AEP TEXAS?

3 A. Yes, except for distribution-served industrial customers who have submitted an
4 identification notice pursuant to 16 TAC § 25.181(u), all customers in the residential
5 and commercial customer classes will have access to the energy efficiency programs
6 offered by AEP Texas.

7

8 IV. ENERGY EFFICIENCY COSTS

9 A. PY 2022

10 Q. WHAT COSTS DID AEP TEXAS INCUR TO IMPLEMENT ITS PY 2022 ENERGY
11 EFFICIENCY PROGRAMS?

12 A. The costs incurred by AEP Texas to implement its PY 2022 energy efficiency programs
13 totaled \$17,220,700, as shown in Schedule B.

14 Q. WERE AEP TEXAS' ACTUAL PY 2022 ENERGY EFFICIENCY COSTS LESS
15 THAN THE ENERGY EFFICIENCY AMOUNT PROJECTED FOR PY 2022?

16 A. Yes. AEP Texas' energy efficiency costs were 4.1% (\$738,317) less than the projected
17 amount in 2022.

18 Q. WERE AEP TEXAS' PY 2022 PROGRAM PORTFOLIO COSTS LESS THAN OR
19 EQUAL TO THE BENEFITS OF THE PROGRAMS?

20 A. Yes. AEP Texas program portfolio costs were less than the benefits of the program.
21 The benefit-cost ratio for AEP Texas' entire PY 2022 program portfolio is shown in
22 Schedule P. The estimated useful life for each measure is provided in Schedule M.

1 Q. PLEASE DESCRIBE AEP TEXAS' PY 2022 ADMINISTRATIVE COSTS.

2 A. AEP Texas' PY 2022 administrative costs included costs to review project applications,
3 award contracts, review incentive reports, conduct field inspections of installed
4 measures, review M&V plans for projects that do not utilize deemed savings measures,
5 and interact with project sponsors. Administrative duties also include continuous
6 review and monitoring of programs for successful program implementation. Costs
7 associated with work activities regarding regulatory reporting and special projects are
8 also considered administrative costs and are included in AEP Texas' administrative
9 costs.

10 Q. DID AEP TEXAS HAVE ANY EXPENSES ASSOCIATED WITH R&D IN PY
11 2022?

12 A. Yes. AEP Texas expended \$391,130 for R&D in PY 2022 as detailed in Schedule B.

13 Q. PLEASE DESCRIBE AEP TEXAS' R&D EFFORTS.

14 A. AEP Texas' PY 2022 R&D projects included costs related to identifying, developing,
15 and implementing necessary enhancements to its electronic data collection and
16 management systems to incorporate updates for new program requirements, regulatory
17 requirements, and deemed savings values; and costs associated with researching new
18 technologies and energy efficiency program ideas. AEP Texas also participated with
19 the Electric Utility Marketing Managers of Texas in research activities that included
20 providing technical support for the Texas Technical Reference Manual (TRM). All of
21 the R&D expenditures incurred in PY 2022 were for the purpose of fostering
22 continuous improvement and innovation in the application of energy efficiency
23 technology and energy efficiency program design and implementation.

1 Q. PLEASE DESCRIBE AEP TEXAS' PY 2022 EXPENDITURES FOR ITS
2 TARGETED LOW-INCOME PROGRAM.

3 A. As required by 16 TAC § 25.181(p), AEP Texas expended \$1,790,209 in PY 2022 for
4 the targeted low-income energy efficiency program, which is 10% of AEP Texas'
5 PY 2022 energy efficiency budget.

6 Q. HAS AEP TEXAS PROVIDED INFORMATION ON THE BIDDING AND
7 ENGAGEMENT PROCESS USED FOR CONTRACTING WITH EESPS?

8 A. Yes. Schedule L describes the process used to select and contract with EESPs.

9 Q. DID ANY SINGLE EESP RECEIVE MORE THAN 5% OF AEP TEXAS'
10 OVERALL INCENTIVE PAYMENTS?

11 A. Yes. Please see Highly Sensitive Schedule J for a list of all EESPs that participated in
12 the PY 2022 programs, including those EESPs receiving more than 5% of AEP Texas'
13 PY 2022 overall incentive payments, as well as a list of all EESPs that participated in
14 the PY 2022 programs. Schedule J also includes contracts associated with those
15 receiving more than 5% of overall incentive payments.

16 Q. DID AEP TEXAS INCUR ANY AFFILIATE COSTS IN PY 2022?

17 A. No. AEP Texas did not incur any affiliate costs in PY 2022.

18 B. 2022 EM&V Costs

19 Q. DID AEP TEXAS INCUR ANY EM&V COSTS IN 2022 FOR THE EVALUATION
20 OF PY 2021?

21 A. Yes, AEP Texas incurred \$211,359 in costs paid to the statewide EM&V contractor
22 during 2022 for the evaluation of PY 2021.

C. 2024 Projected Energy Efficiency Program Costs

Q. WHAT ARE AEP TEXAS' ENERGY EFFICIENCY PLANS FOR PY 2024?

A. As shown in Schedule A, AEP Texas will implement 13 energy efficiency programs in PY 2024 for a total projected cost of \$18,927,908, which includes R&D and EM&V activities. The 13 energy efficiency programs are described in Schedule R and are designed to allow AEP Texas to achieve its energy efficiency objectives for PY 2024. This portfolio of programs will continue to encourage EESPs to provide energy efficiency services to all qualifying residential and commercial customers. Each year AEP Texas reviews the programs and activities that have taken place to improve its plan for the upcoming year. AEP Texas has selected the programs that it believes will achieve its PY 2024 objectives and comply with PURA provisions and the Commission's rule.

Q. HOW DID AEP TEXAS DETERMINE ITS PY 2024 ENERGY EFFICIENCY OBJECTIVES?

A. AEP Texas first determined to achieve even greater cost-effective energy efficiency savings than required by the Commission's rule. AEP Texas then allocated portions of its PY 2024 projected program costs among customer classes using criteria such as customer counts, historical cost allocation, and previous program success. The Hard-to-Reach SOP and the Targeted Low-Income Energy Efficiency Program were designed to comply with PURA provisions and the Commission's rule. AEP Texas then estimated projected impacts from each program based on historical results and previous years' experience. Projected impacts from all programs within each customer class were then combined to formulate customer class projected savings. Finally, all

1 projected customer class savings were added together to produce AEP Texas' PY 2024
2 projected energy efficiency savings as shown in Schedule O.

3 Q. ARE THERE SPECIFIC TYPES OF ADMINISTRATIVE COSTS ASSOCIATED
4 WITH THE PY 2024 ENERGY EFFICIENCY PROGRAMS?

5 A. Yes. Administrative costs for PY 2024 will include costs for reviewing project
6 applications, awarding contracts, reviewing M&V plans for some projects that do not
7 utilize deemed savings measures, performing field inspections of installed measures,
8 processing incentive payments, and interacting with project sponsors. Administrative
9 costs also include development, review and selection of new or revised programs that
10 may be considered for successful program implementation. Costs associated with work
11 activities regarding regulatory reporting, EECRF filing, and other energy efficiency-
12 related projects are also considered administrative costs and are included as shown in
13 Schedule A.

14 Q. DOES AEP TEXAS PROJECT ANY R&D COSTS FOR PY 2024?

15 A. Yes, AEP Texas PY 2024 projected R&D costs include \$353,646 or about 2% of its
16 total projected program costs as shown in Schedule A.

17 D. 2024 EM&V Costs

18 Q. DOES AEP TEXAS INCLUDE ANY EM&V COSTS IN THIS FILING?

19 A. Yes. AEP Texas is including \$233,450 as its apportioned EM&V costs to be incurred
20 in 2024 for the evaluation of PY 2023.

1 V. ENERGY EFFICIENCY PROGRAMS

2 A. PY 2022 Programs

3 Q. WHAT PROGRAMS DID AEP TEXAS OFFER IN PY 2022 TO ACHIEVE ITS
4 ENERGY EFFICIENCY OBJECTIVES?

5 A. AEP Texas offered the following programs in PY 2022:

- 6 • Commercial Solutions MTP
- 7 • Commercial SOP
- 8 • CoolSaverSM A/C Tune-up MTP
- 9 • Hard-to-Reach SOP
- 10 • High Performance New Homes MTP
- 11 • Load Management SOP
- 12 • Open MTP
- 13 • Residential SOP
- 14 • SCORE/CitySmart MTP
- 15 • SMART SourceSM Solar PV MTP
- 16 • Targeted Low-Income Energy Efficiency Program

17 Q. PLEASE DESCRIBE THE COMMERCIAL SOLUTIONS MTP.

18 A. The Commercial Solutions MTP identifies a variety of commercial customers having
19 a high likelihood of installing energy efficiency measures within their facilities. These
20 customers may have delayed making such improvements for a number of reasons,
21 including an inability to identify appropriate actions to take or lack of understanding of
22 energy efficiency project funding. The Commercial Solutions MTP provides education
23 and information to such customers, and provides monetary incentives to encourage
24 them to take action to improve their facilities' energy efficiency.

1 Q. PLEASE DESCRIBE THE COMMERCIAL SOP.

2 A. The Commercial SOP provides incentives for the installation of a wide range of
3 measures that reduce customer energy costs and reduce peak demand and/or save
4 energy in non-residential facilities. Examples of eligible customer sites include hotels,
5 schools, manufacturing facilities, restaurants, and larger grocery and retail stores.
6 These types of customers have installed eligible measures such as lighting systems,
7 new or replacement chiller systems, high-efficiency pumping systems, and other
8 similar efficient technologies. Incentives are paid to project sponsors on the basis of
9 deemed savings or, if deemed savings have not been established for a particular
10 qualifying energy efficiency measure, incentives may be paid on the basis of verified
11 peak demand and/or energy savings using the International Performance Measurement
12 & Verification Protocol.

13 Q. PLEASE DESCRIBE THE COOLSAVERSM A/C TUNE-UP MTP.

14 A. The CoolSaverSM A/C Tune-Up MTP is designed to overcome market barriers that
15 prevent residential and small business customers from receiving high-performance A/C
16 system tune-ups. This program works with local A/C distributor networks to train and
17 certify A/C technicians on tune-up and air flow correction services and protocols.

18 Q. PLEASE DESCRIBE THE HARD-TO-REACH SOP.

19 A. The Hard-to-Reach SOP targets a specific subset of residential customers defined by
20 16 TAC § 25.181(c)(27). The hard-to-reach customer is one whose total household
21 income is at or below 200% of federal poverty guidelines. The program provides
22 incentives for the installation of a wide range of measures that reduce residential
23 customer energy costs and reduce peak demand. It is designed to cost-effectively

1 provide energy efficiency improvements to individual households at no or very low
2 cost. Incentives are paid to project sponsors for eligible measures installed in retrofit
3 applications on the basis of deemed savings. Eligible measures include replacement air
4 conditioners, wall and ceiling insulation, and air distribution duct improvements,
5 among others.

6 Q. PLEASE DESCRIBE THE HIGH PERFORMANCE NEW HOMES MTP.

7 A. The High Performance New Homes MTP targets homebuilders and residential
8 consumers. The program's goal is to create conditions where consumers demand high
9 performance built homes, and homebuilders supply these energy-efficient homes.
10 Incentives are paid to homebuilders who construct high performance built homes.

11 Q. PLEASE DESCRIBE THE LOAD MANAGEMENT SOP.

12 A. The Load Management SOP targets commercial customers that have a minimum
13 demand of 500 kW or more. Incentives are paid to project sponsors that identify
14 interruptible load and provide curtailment of this electric load on short notice. These
15 payments are based on the verified demand savings methodology identified in the
16 Texas TRM.

17 Q. PLEASE DESCRIBE THE OPEN MTP.

18 A. The Open MTP targets traditionally underserved small commercial customers who may
19 not employ knowledgeable personnel with a focus on energy efficiency, who are
20 limited in the ability to implement energy efficiency measures, and/or who typically do
21 not actively seek the help of a professional EESP. Small commercial customers with a
22 peak demand not exceeding 150 kW in the previous 12 consecutive billing months may
23 qualify to participate in the program. The program is intended to overcome market

1 barriers for participating contractors by providing technical support and incentives to
2 implement energy efficiency upgrades and produce demand and energy savings.

3 Q. PLEASE DESCRIBE THE RESIDENTIAL SOP.

4 A. The Residential SOP provides incentives for the installation of a wide range of
5 measures that reduce residential customer energy costs and reduce peak demand. It is
6 also designed to encourage private sector delivery of energy efficiency products and
7 services. Incentives are paid to project sponsors for eligible measures installed in
8 retrofit applications on the basis of deemed savings. Eligible measures include
9 replacement air conditioners, wall and ceiling insulation, and air distribution duct
10 improvements, among others.

11 Q. PLEASE DESCRIBE THE SCORE/CITYSMART MTP.

12 A. The Schools COnserving RESources/CitySmart MTP (SCORE/CitySmart) provides
13 energy efficiency and demand reduction solutions for government and educational
14 customers. SCORE/CitySmart facilitates the examination of actual demand and energy
15 savings, operating characteristics, program design, long-range energy efficiency
16 planning and overall measure and program acceptance by the targeted cities and
17 schools. This program is designed to help educate and assist these customers to lower
18 energy use by integrating energy efficiency into their short- and long-term planning,
19 budgeting and operational practices. Incentives are paid to participants for certain
20 qualifying measures installed in new or retrofit applications that result in verifiable
21 demand and energy savings.

1 Q. PLEASE DESCRIBE THE SMART SOURCESM SOLAR PV MTP.

2 A. The SMART SourceSM Solar PV MTP offers residential and commercial installations
3 a financial incentive for installations of solar electric (photovoltaic) systems
4 interconnected on the customer's side of the electric service meter. The goal of this
5 program is to transform the market by increasing the number of qualified companies
6 offering installation services and by decreasing the average installed cost of systems,
7 creating economies of scale.

8 Q. PLEASE DESCRIBE THE TARGETED LOW-INCOME ENERGY EFFICIENCY
9 PROGRAM.

10 A. AEP Texas' Targeted Low-Income Energy Efficiency Program is designed to
11 cost-effectively reduce the energy consumption and energy costs of AEP Texas'
12 low-income residential customers. The program provides eligible residential customers
13 with appropriate weatherization measures and basic on-site energy education.

14 B. PY 2022 Achievements

15 Q. PLEASE DESCRIBE THE AEP TEXAS REQUIRED DEMAND REDUCTION
16 GOAL FOR PY 2021 AND THE RESULTS THAT WERE ACHIEVED IN 2022.

17 A. The AEP Texas required demand reduction goal to be achieved in PY 2022 was 20.83
18 MW. The AEP Texas actual demand reduction achieved was 53.40 MW of peak
19 demand savings from its PY 2022 energy efficiency programs.

1 Q. PLEASE DESCRIBE THE AEP TEXAS REQUIRED ENERGY REDUCTION
2 GOAL FOR PY 2022 AND THE RESULTS THAT WERE ACHIEVED IN PY 2022.

3 A. The AEP Texas required energy reduction goal to be achieved in PY 2022 was 36,494
4 MWh. The AEP Texas actual energy reduction achieved was 83,915 MWh from its PY
5 2022 energy efficiency programs.

6 Q. PLEASE DESCRIBE THE AMOUNT OF DEMAND REDUCTION THAT AEP
7 TEXAS ACHIEVED FROM ITS HARD-TO-REACH PROGRAMS.

8 A. AEP Texas achieved a total demand reduction of 2.14 MW from its hard-to-reach
9 programs (1.47 MW from its Hard-To-Reach SOP and 0.67 MW from its Targeted
10 Low Income Energy Efficiency Program).

11 Q. DID AEP TEXAS ACHIEVE MORE THAN 5% OF ITS STATUTORY DEMAND
12 REDUCTION GOAL FROM ITS HARD-TO-REACH PROGRAMS?

13 A. Yes, AEP Texas achieved 10% of its PY 2022 statutory demand reduction goal from
14 its hard-to-reach programs.

15 Q. DID AEP TEXAS EARN A PERFORMANCE BONUS FOR PY 2022?

16 A. Yes. Mr. Cavazos discusses the \$6,077,493 performance bonus earned by AEP Texas
17 for its PY 2022 results.

18 Q. SHOULD AEP TEXAS BE GRANTED ITS PERFORMANCE BONUS?

19 A. Yes, AEP Texas should be granted its performance bonus set forth in Schedule D.

C. PY 2024 Programs

Q. WHAT PROGRAMS WILL AEP TEXAS OFFER IN PY 2024 TO ACHIEVE THE ENERGY EFFICIENCY OBJECTIVES?

A. AEP Texas will offer the following programs in PY 2024:

- Commercial Solutions MTP
- Commercial SOP
- CoolSaverSM A/C Tune-up MTP
- Commercial Food Service Pilot MTP
- Hard-to-Reach SOP
- High Performance New Homes MTP
- Load Management SOP
- Open MTP
- Residential SOP
- SCORE/CitySmart MTP
- SMART SourceSM Solar PV MTP
- Targeted Low Income Energy Efficiency Program
- Winter Load Management SOP

Descriptions of these programs are provided in Schedule R.

Q. WHAT IS THE PY 2024 PROJECTED COST FOR EACH PROGRAM?

A. Schedule A contains details of the PY 2024 projected cost for each of AEP Texas' programs.

Q. WHAT ARE THE PROJECTED SAVINGS FROM EACH PROGRAM?

A. Schedule O contains the PY 2024 projected savings from each program.

Q. DOES THIS CONCLUDE YOUR DIRECT TESTIMONY?

A. Yes, it does.

PUBLIC UTILITY COMMISSION OF TEXAS

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

**DIRECT TESTIMONY OF
JENNIFER L. JACKSON
FOR
AEP TEXAS INC.**

JUNE 1, 2023

TESTIMONY INDEX

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1 Q. HAVE YOU PREVIOUSLY SPONSORED TESTIMONY BEFORE THIS
2 COMMISSION?

3 A. Yes, I have previously sponsored testimony before the Public Utility Commission of
4 Texas (PUCT or the Commission) in the following dockets: 20545, 28520, 28840,
5 31251, 31461, 32758, 33309, 33310, 35625, 35627, 36422, 36928, 36949, 36961,
6 36960, 36959, 38208, 38209, 38210, 39359, 39360, 39361, 40358, 40359, 40443,
7 41538, 41539, 41879, 41970, 42370, 42508, 42509, 44717, 44718, 45787, 45788,
8 45928, 45929, 47015, 47236, 48110, 48422, 49163, 49494, 49592, 51415, 52199, and
9 53679. I have also sponsored testimony before the Arkansas Public Service
10 Commission and the Oklahoma Corporation Commission.

11 Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

12 A. 16 Tex. Admin. Code (TAC) § 25.182, permits a utility to establish an energy
13 efficiency cost recovery factor (EECRF) to recover its reasonable expenditures on
14 energy efficiency programs, a performance bonus for exceeding its minimum goals,
15 Evaluation, Measurement and Verification (EM&V) costs allocated to the utility, and
16 proceeding expenses.

17 The purpose of my testimony is to: (1) support the calculation of the annual
18 redetermination of AEP Texas' EECRF; and (2) present the revised tariff (Rider
19 EECRF), included as Schedule F to AEP Texas' filing, proposed to be effective
20 March 1, 2024.

21 Q. PLEASE SUMMARIZE YOUR TESTIMONY.

22 A. AEP Texas is requesting recovery of \$24,833,529 through its Rider EECRF, which
23 includes: projected program year (PY) 2024 energy efficiency program costs; EM&V

costs; the return to customers of an over-recovery of PY 2022 program costs, including interest; and EECRF proceeding expenses—including expenses necessary to reimburse intervening municipalities—incurred in Docket No. 53679. The class assignment of these costs has been performed consistent with 16 TAC § 25.182(d) and AEP Texas' last EECRF proceeding. The proposed EECRF factors, which are designed to recover the PY 2024 EECRF revenue requirement, are calculated based on projected 2024 kWh sales for all EECRF classes eligible for the EECRF. AEP Texas' proposed EECRF factors comply with the requirements for cost caps under 16 TAC § 25.182(d)(7).

Q. WHAT SCHEDULES THAT ACCOMPANY THE AEP TEXAS FILING DO YOU SPONSOR?

A. I sponsor the following schedules:

Schedule	Description
Schedule E	Calculation of the 2024 AEP Texas EECRF Factors
Schedule F	AEP Texas Rider EECRF
Schedule G	Calculation of Cost Caps
Schedule H	Development of Forecasted Billing Units
Schedule Q	System and Line Losses

I also sponsor the workpapers supporting these schedules.

Q. WHAT SCHEDULES ARE YOU CO-SPONSORING?

A. I am co-sponsoring Schedule A with AEP Texas witnesses Robert Cavazos and Pamela D. Osterloh; Schedule B with AEP Texas witness Osterloh; and Schedule C with AEP Texas witness Cavazos.

- Schedule A provides the requested program budget year proposed incentives and administrative costs, research and development (R&D) and EM&V costs in total and by EECRF rate class.

- Schedule B provides the historical program budget year actual incentives and administrative costs, and R&D and EM&V costs in total and by EECRF rate class.
- Schedule C provides the actual results from the PY 2022 by EECRF rate class, including EECRF revenues.

II. ADJUSTED EECRF REVENUE REQUIREMENT FOR PY 2024

Q. WHY IS AEP TEXAS REQUESTING APPROVAL OF AN ADJUSTED EECRF?

A. 16 TAC § 25.182(d)(8) requires a utility in an area in which customer choice is offered with an EECRF, to apply no later than June 1 of each year to adjust its EECRF effective March 1 of the following year. AEP Texas is currently billing its customers the 2023 EECRF factors approved in Docket No. 53679. In this case, AEP Texas is requesting Commission approval of an adjusted Rider EECRF with factors to be effective March 1, 2024.

Q. WHAT IS THE REVENUE REQUIREMENT THAT AEP TEXAS IS TO RECOVER THROUGH ITS PROPOSED ADJUSTED EECRF?

A. AEP Texas is requesting to recover \$24,833,529 through its adjusted Rider EECRF in PY 2024. This revenue requirement reflects the following:

- recovery of \$18,694,458; in energy efficiency program costs projected to be incurred in PY 2024;
- an adjustment of \$227,177 to account for the over-recovery of EECRF revenues above actual energy efficiency program expenditures incurred for its PY 2022 programs, including interest in the amount of \$2,941 and recovery of 2022 EM&V;
- recovery of \$6,077,493 representing AEP Texas' earned performance bonus for demand and energy savings achieved in PY 2022;
- recovery of EECRF proceeding expenses from Docket No. 53679 in the amount of \$55,305—including \$6,537.50 in reimbursed proceeding

1 expenses incurred by municipal intervenors and \$48,767.94 for AEP
2 Texas' legal expenses; and

- 3 • recovery of EM&V costs in the amount of \$233,450 for the evaluation
4 of PY 2023.

5 Q. HOW ARE THE PY 2024 PROGRAM COSTS ASSIGNED TO EACH CLASS?

6 A. PY 2024 program costs are assigned to EECRF rate classes on a program-by-program
7 basis following the methodology employed in AEP Texas' 2023 EECRF approved in
8 Docket No. 53679. The class assignment of the PY 2024 program costs, including
9 administrative costs, is based on the direct assignment to the EECRF rate classes
10 eligible for specific programs where possible.

11 Q. HOW ARE THE PY 2024 PROGRAM COSTS THAT ARE NOT DIRECTLY
12 ASSIGNED TO A CLASS ALLOCATED?

13 A. Where more than one EECRF rate class is eligible to participate in a specific program,
14 AEP Texas has employed an adjusted and weighted demand allocator to assign
15 program costs across the eligible classes based on allocators approved in its most recent
16 base-rate case, Docket No. 49494.

17 PY 2024 R&D costs are allocated across the eligible classes using the weighted
18 and adjusted demand allocators.

19 The transmission service class of customers is not allocated energy efficiency
20 program costs through the EECRF because those customers taking service at 69
21 kilovolts (kV) and above are not eligible for participation in AEP Texas' PY 2024
22 energy efficiency programs.

1 Q. PLEASE DESCRIBE THE ADJUSTED DEMAND ALLOCATION FACTORS
2 USED TO ALLOCATE PY 2024 COSTS THAT ARE NOT DIRECTLY ASSIGNED
3 TO RATE CLASSES.

4 A. The class distribution function demand allocators from Docket No. 49494 have been
5 weighted to remove the lighting class and transmission customers at or above 69 kV
6 and adjusted using 2024 projected kWh. The 2024 kWh projection also accounts for
7 industrial customers identifying themselves under 16 TAC § 25.181(c)(30) and (u).
8 Under 16 TAC § 25.181(c)(30) and (u), distribution voltage industrial customers that
9 qualify for a tax exemption under Tex. Tax Code Ann. § 151.317 and submit an
10 identification notice by February 1 characterizing the account as such, are not eligible
11 for participation in energy efficiency programs through the EECRF beginning with the
12 next calendar year. AEP Texas has therefore removed kWh associated with those
13 customers from the 2024 kWh projection. The removal of the identification notice
14 customers affects the adjusted demand allocators and the calculation of the proposed
15 class EECRF factors for 2024. The kWh associated with the identification notice
16 customers and the resulting 2024 kWh projection are shown in Schedule H and the
17 adjusted demand allocators and supporting data are shown in the rate design
18 workpapers supporting Schedule E; WP Schedule E (Adj Allocators).

19 Q. HOW WAS THE 2022 OVER-RECOVERY DETERMINED?

20 A. The over-recovery was determined by comparing AEP Texas' PY 2022 Rider EECRF
21 revenues with actual PY 2022 expenditures—including EM&V costs and excluding
22 rate-case expenses for Docket No. 53679. This comparison resulted in an over-
23 recovery for PY 2022 in the amount of \$223,786. This amount includes a trailing

1 under-recovery of \$451 from the Transmission Class that has continued since base-rate
2 energy efficiency recovery existed for that class. AEP Texas has determined to forego
3 the recovery of this small amount. The resulting adjusted PY 2022 over-recovery is
4 \$224,236. Interest on the over-recovery balance is required per 16 TAC
5 § 25.182(d)(10)(D). Interest on the over-recovery balance is \$2,941, for a total
6 over-recovery with interest of \$227,177.

7 The over-recovery with interest is shown on Schedule C (2022) and is
8 summarized in WP Schedule C (Summary).

9 Q. HOW IS AEP TEXAS ASSIGNING THE 2022 OVER-RECOVERY TO THE
10 CLASSES?

11 A. The over-recovery assignment to each class is based on a comparison of the total 2022
12 energy efficiency revenues and EECRF Rider revenues by EECRF rate class, to actual
13 2022 program costs assigned to each EECRF rate class. The actual 2022 energy
14 efficiency program costs have been directly assigned to the individual EECRF rate
15 classes that actually participated in each program using a direct, program-by-program
16 assignment. The 2022 administrative costs follow the assignment of the incentive costs
17 and the R&D costs have been either directly assigned to the rate classes or allocated to
18 the classes based on the 2022 class program cost assignment. The specifics of the class
19 assignment of the over-recovery are shown in the workpapers supporting Schedule C.

20 Q. HOW IS AEP TEXAS ASSIGNING THE PY 2022 EARNED PERFORMANCE
21 BONUS TO THE CLASSES?

22 A. AEP Texas has assigned the PY 2022 earned performance bonus to all EECRF rate
23 classes eligible for participation in the PY 2022 energy efficiency programs using an

1 allocator based on the direct assignment of the PY 2022 program incentives to the
2 EECRF rate classes. AEP Texas' allocation is in accordance with 16 TAC
3 § 25.182(e)(6), which states that the bonus shall be allocated in proportion to the
4 program costs associated with meeting the demand and energy goals and allocated to
5 the eligible customers on a rate class basis. The detail for the earned performance
6 bonus allocation is shown in WP Schedule E (2022 Bonus).

7 Q. ARE THERE EECRF PROCEEDING EXPENSES INCLUDED IN THE 2024
8 TOTAL REVENUE REQUIREMENT?

9 A. Yes. AEP Texas has included in EECRF proceeding expenses that it incurred in Docket
10 No. 53679 as well expenses to reimburse intervening municipalities for their
11 participation in Docket No. 53679. The detail of the municipal and AEP legal counsel
12 EECRF proceeding expenses are shown in WP Schedule E (Proceeding Expenses).
13 The support for those expenses is included in Exhibits RC-1 and RC-2 to the testimony
14 of Mr. Cavazos.

15 Q. HOW IS AEP TEXAS ASSIGNING THE EECRF PROCEEDING EXPENSES TO
16 THE CLASSES?

17 A. AEP Texas has assigned the total requested EECRF proceeding expenses to the classes
18 using an allocator developed using the assignment of the PY 2024 program cost to the
19 EECRF rate classes.

20 Q. HAS AEP TEXAS INCLUDED EM&V COSTS IN THE PY 2024 REVENUE
21 REQUIREMENT?

22 A. Yes. AEP Texas has included its allocated share of statewide EM&V contractor costs
23 for evaluating PY 2023 in the PY 2024 revenue requirement to be recovered through

1 the 2024 EECRF. The statewide EM&V contractor costs are shown in WP Schedule E
2 (EMV).

3 **III. DEVELOPMENT OF EECRF CLASS FACTORS**

4 **Q. HOW ARE THE EECRF FACTORS DETERMINED ONCE ALL THE**
5 **COMPONENTS ARE ASSEMBLED?**

6 **A. Once the total EECRF class revenue requirement is developed and assigned to EECRF**
7 **rate classes by direct assignment or by using the appropriate allocators, EECRF class**
8 **factors are calculated by dividing the revenue requirement for each EECRF rate class**
9 **by the 2024 projected billing units for each EECRF rate class. The 2024 EECRF factors**
10 **for AEP Texas are shown in Schedule E and the revised AEP Texas Rider EECRF is**
11 **contained in Schedule F.**

12 **Q. WHAT BILLING UNIT IS AEP TEXAS PROPOSING TO USE TO RECOVER THE**
13 **ENERGY EFFICIENCY COSTS?**

14 **A. AEP Texas is proposing to continue to use an energy charge (kWh) for recovery of**
15 **energy efficiency costs for all classes of customers included in the EECRF, as**
16 **authorized by 16 TAC § 25.182(d)(6). AEP Texas' kWh proposal is consistent with**
17 **past approved EECRF billing methodologies and is in compliance with 16 TAC**
18 **§ 25.182(d)(6). AEP Texas has supplied forecasted 2024 kWh data for all classes in**
19 **Schedule H.**

20 **Q. PLEASE DESCRIBE HOW THE 2024 FORECASTED BILLING UNITS USED IN**
21 **THE DEVELOPMENT OF THE EECRF FACTORS FOR PROGRAM YEAR 2024**
22 **WERE DETERMINED.**

1 A. As part of the normal course of business, AEPSC projects monthly kWh sales for each
2 of its operating companies, including AEP Texas. The AEPSC Economic Forecasting
3 Department provides the total retail kWh sales forecasts by revenue class. Because the
4 kWh sales are projected on a revenue class basis kWh data must be converted to
5 EECRF rate class forecasted kWh sales. Forecasted kWh sales by EECRF rate class
6 were established by first determining each EECRF rate class's percentage of total retail
7 sales based on twelve months of historical kWh sales data. Forecasted kWh sales by
8 rate class were then calculated by multiplying each rate class's percentage of total retail
9 kWh sales by the total retail forecasted kWh sales. As discussed above, the projection
10 of the 2024 kWh reflects the removal of the identification notice customer kWh. The
11 annual class projected kWh sales less the customer identification notice kWh for each
12 EECRF rate class was used to determine the adjusted 2024 EECRF class factors.
13 Schedule H specifies the process for determining the projected kWh sales by EECRF
14 rate class.

15 Q. WERE SYSTEM AND LINE LOSSES USED TO DEVELOP THE EECRF
16 FACTORS?

17 A. No. AEP Texas' kWh sales forecast for 2024 is based on energy delivered at the meter,
18 so it was not necessary to adjust the EECRF factors to reflect system and line losses.

1 Q. WHAT ARE THE PROPOSED 2024 EECRF RATE CLASS FACTORS?

2 A. The proposed 2024 factors by EECRF rate class as shown in Schedule F are:

AEP Texas		
Rate Class	Proposed kWh Factor	Billing Unit Per Rate
Residential	\$0.000996	kWh
Secondary <= 10 kW	\$0.000686	kWh
Secondary > 10 kW	\$0.000908	kWh
Primary	\$0.000562	kWh
Transmission	\$0.000000	kW

3 Q. HAS AEP TEXAS CALCULATED THE EECRF FACTORS IN A MANNER
4 CONSISTENT WITH 16 TAC § 25.182?

5 A. Yes.

6 Q. DO THE 2024 EECRF FACTORS, EXCLUDING MUNICIPAL EECRF
7 PROCEEDING EXPENSES AND STATEWIDE EM&V CONTRACTOR COSTS,
8 EXCEED THE MAXIMUM PRICE PER KWH FOR RESIDENTIAL AND
9 COMMERCIAL CUSTOMERS AS SPECIFIED IN 16 TAC § 25.182(d)(7)?

10 A. No, they do not. 16 TAC § 25.182(d)(7) recognizes two groups of customers for the
11 purposes of setting cost caps, residential and commercial. Neither class factor exceeds
12 the PY 2024 cost cap.

13 Q. HOW ARE THE 2024 EECRF COST CAPS DETERMINED?

14 A. The method of calculating the 2024 cost caps is described in 16 TAC
15 § 25.182(d)(7)(C). The most recently available calendar year's percentage change in
16 the South urban consumer price index is calendar year 2022. The percentage change
17 for calendar year 2024 is 8.58%. AEP Texas has evaluated the cap based on the

1 adjusted 2024 per kWh residential cap of \$.001556 and commercial cap of \$.000973.
2 The 2024 cost cap calculation is included in Schedule G of the combined AEP Texas
3 EECRF filing schedules.

4 **Q. HOW DO THE PROPOSED FACTORS FOR RESIDENTIAL AND COMMERCIAL**
5 **COMPARE TO THE 2024 COST CAPS?**

6 **A. The revised residential factor excluding municipal EECRF proceeding expenses,**
7 **EM&V statewide contractor costs, and interest on the over-recovery is \$.000987 per**
8 **kWh, which does not exceed the residential maximum of \$.001556 per kWh. The**
9 **maximum commercial rate per kWh for 2024 is \$.000973 per kWh as explained**
10 **above. The updated commercial class factor excluding the municipal EECRF**
11 **proceeding expenses, statewide EM&V contractor cost, and interest on the over-**
12 **recovery is \$.000787 per kWh, which does not exceed the cap for the commercial**
13 **class. Schedule G details the 2024 cost cap comparison.**

14 **Q. HAS AEP TEXAS INCLUDED A CALCULATION OF THE 2022 CAP BASED ON**
15 **ACTUAL PROGRAM COSTS AND ACTUAL 2022 BILLING UNITS?**

16 **A. Yes, AEP Texas has included a 2022 cap calculation based on actual 2022 program**
17 **costs and billing units as part of Schedule G.**

18 **Q. DID AEP TEXAS EXCEED THE 2022 CAPS BASED ON ACTUAL DATA?**

19 **A. No. Neither EECRF rate class exceeded the 2022 caps.**

20 **Q. HOW WERE THE 2022 CAPS CALCULATED?**

21 **A. The 2022 caps were calculated by removing the statewide EM&V contractor's costs**
22 **and the municipal EECRF proceeding expenses paid in 2022 from the total 2022**
23 **Energy Efficiency actual program costs and dividing that total amount by the class**

1 2022 EECRF billing units less any customer ID notice kWh. This calculation yields
2 the following results for the classes:

Class	2022 Cost per kWh	2022 Cap
Residential	\$0.001117	\$0.001364
Commercial	\$0.000813	\$0.000853

3 Q. ARE SOME CUSTOMERS EXCLUDED FROM EECRF CHARGES?

4 A. Yes, in addition to transmission customers taking service at 69 kV, distribution
5 industrial customers meeting the definition and fulfilling the requirements as outlined
6 in 16 TAC § 25.181(c)(30) and (u) (ID Notice Customers) are excluded from EECRF
7 charges. Also, the lighting class has not been assigned or allocated any 2024 costs.

8 Q. HAVE YOU PROVIDED THE REVISED TARIFF REFLECTING 2024 EECRF
9 FACTORS FOR AEP TEXAS?

10 A. Yes. The proposed Rider EECRF is shown in the Schedule F. AEP Texas requests
11 that the Commission approve Rider EECRF to be effective March 1, 2024.

12 Q. DOES THIS CONCLUDE YOUR DIRECT TESTIMONY?

13 A. Yes, it does.

**AEP Texas
2024 Energy Efficiency Cost Recovery Factor**

SCHEDULE A

2024 Projected Energy Efficiency Program Costs

	Incentives	Administrative	Research & Development	EM&V	Total Projected Energy Efficiency Costs
Commercial					
Commercial Food Service Pilot MTP	\$ 280,000	\$ 25,000			\$305,000
Commercial Solutions MTP	\$903,248	\$115,485			\$1,018,733
Commercial SOP	\$1,875,762	\$218,467			\$2,094,229
CoolSaver® A/C Tune-Up MTP	\$796,700	\$88,522			\$885,222
Load Management SOP	\$737,700	\$85,300			\$823,000
Open MTP	\$1,213,041	\$150,959			\$1,364,000
SCORE/CitySmart MTP	\$1,192,300	\$141,884			\$1,334,184
SMART Source SM Solar PV MIP	\$287,310	\$35,017			\$322,327
Winter Load Management SOP	\$350,000	\$25,000			\$375,000
Residential					
CoolSaver® A/C Tune-Up MTP	\$825,000	\$91,667			\$916,667
High Performance New Homes MTP	\$965,000	\$107,222			\$1,072,222
Residential SOP	\$3,164,657	\$359,868			\$3,524,525
SMART Source SM Solar PV MIP	\$670,941	\$79,059			\$750,000
Hard-to-Reach					
Hard-to-Reach SOP	\$1,412,560	\$156,840			\$1,569,400
Targeted Low-Income Energy Efficiency Program	\$1,799,159	\$187,144			\$1,986,303
Research and Development					
R&D Programs	NAP	NAP	\$353,646		\$353,646
Total Projected Program Costs	\$16,473,378	\$1,867,434	\$353,646	\$0	\$18,694,458
Evaluation Measurement & Verification (EM&V)					
EM&V				\$233,450	\$233,450
Total Projected Energy Efficiency costs	\$16,473,378	\$1,867,434	\$353,646	\$233,450	\$18,927,908

2024 AEP Line Item	Est.	Sec. 10	Sec. 10	Summary	Total
Commercial					
Commercial Foodservice Hot MUP	\$15,506	\$120,606	\$66,874		\$196,986
Commercial Solidation MUP	\$12,106	\$137,622	\$126,210		\$1,075,758
Commercial COP	\$107,099	\$1,416,760	\$470,349		\$2,094,209
Coalition/As-C Turn-Up MUP	\$49,271	\$641,128	\$106,213		\$896,612
Load Management MUP		\$626,150	\$19,211		\$845,360
Open RLF	\$39,961	\$1,271,099			\$1,311,060
SCORP/Compass MUP	\$68,291	\$966,292	\$209,661		\$1,144,144
SMART Resource/Star PV MUP	\$16,484	\$151,468	\$72,394		\$339,346
Water Load Management		\$158,275	\$68,763		\$327,038
Residential					
Coalition/As-C Turn-Up MUP		\$916,667			\$916,667
High-Performance New Homes MUP	\$1,672,221				\$1,672,221
Residential COP	\$5,516,574				\$5,516,574
SMART Resource/Star PV MUP	\$740,000				\$740,000
Transportation					
Hard-to-Reach S/M	\$1,689,650				\$1,689,650
Trip and Low-Income Energy Efficiency Program	\$1,986,511				\$1,986,511
Research and Development (R&D)					
R&D Program	\$300,126.27	\$7,850,911	\$111,186.39	\$34,830.39	\$3,317,054
PR&V	\$125,117	\$1,027	\$21,618	\$10,480	\$237,242
Total Energy Efficiency Program Revenue Requirement	\$10,144,361	\$407,820	\$6,698,619	\$1,675,267	\$18,926,027

AEP Texas
2024 Energy Efficiency Cost Recovery Factor

Schedule B

2022 Actual Energy Efficiency Expenditures

Customer Class and Program	2022				
	Incentives	Administrative	Research & Development	Evaluation, Measurement & Verification	Total Funds Expended
Commercial					
Commercial Solutions MTP	\$ 876,527	\$ 83,799			\$960,326
Commercial SOP	\$ 1,846,073	\$ 235,986			\$2,082,059
CoolSaver® A/C Tune-Up MTP	\$ 876,772	\$ 61,632			\$938,403
Load Management SOP	\$ 802,171	\$ 90,376			\$892,547
Open MTP	\$ 1,055,076	\$ 111,849			\$1,166,925
SCORE/CitySmart MTP	\$ 1,180,225	\$ 112,441			\$1,292,666
SMART Source SM Solar PV MTP	\$ 169,780	\$ 17,762			\$187,543
Residential					
CoolSaver® A/C Tune-Up MTP	\$ 819,778	\$ 74,643			\$894,421
High Performance New Homes MTP	\$ 844,092	\$ 97,174			\$941,266
Residential SOP	\$ 2,963,580	\$ 279,887			\$3,243,467
SMART Source SM Solar PV MTP	\$ 605,919	\$ 59,872			\$665,791
Hard-to-Reach					
Hard-to-Reach SOP	\$ 1,427,558	\$ 135,030			\$1,562,587
Targeted Low Income Energy Efficiency Program	\$ 1,611,583	\$ 178,626			\$1,790,209
Research & Development					
Research & Development	NAP	NAP	\$ 391,130		\$391,130
Evaluation, Measurement & Verification					
PY 2019 Statewide EM&V Contractor	NAP	NAP	NAP	\$ 211,359	\$211,359
TOTAL	\$15,079,133	\$1,539,077	\$391,130	\$211,359	\$17,220,700

2022 AEP Texas	Rca	Soc 10	Soc 10	Primary	Total
Commercial Programs					
ComSol MTP		53,374	841,100	65,852	960,326
Commercial SOP		45,653	1,182,208	854,198	2,082,059
CoolSaver® A/C Tune-Up MTP		112,796	761,571	64,037	938,403
Load Management SOP		0	416,646	475,901	892,547
Open MTP		79,506	1,087,419	0	1,166,925
SCORE CitySmart MTP		17,720	1,045,358	229,588	1,292,666
SMART Source SM Solar PV MTP		0	187,543	0	187,543
Total Commercial		309,050	5,521,844	1,689,575	7,520,469
Residential Programs					
CoolSaver® A/C Tune-Up MTP	894,421				894,421
High Performance New Homes MTP	941,266				941,266
Residential SOP	3,243,467				3,243,467
SMART Source SM Solar PV MTP	665,791				665,791
Total Residential	5,744,945				5,744,945
Hard-to-Reach Programs					
Hard-To-Reach SOP	1,562,587				1,562,587
Targeted Low Income Energy Efficiency Program	1,790,209				1,790,209
Total HTR	3,352,796				3,352,796
Total Programs	\$9,097,742	\$309,050	\$5,521,844	\$1,689,575	\$16,618,211
Research & Development	\$264,779	\$5,230	\$92,815	\$28,305	\$391,130
EM&V -statewide contr	\$115,918	\$3,923	\$69,975	\$21,543	\$211,359
Total R&D	\$380,697	\$9,153	\$162,790	\$49,848	\$602,489
Total 2022	\$9,478,439	\$318,203	\$5,684,634	\$1,739,424	\$17,220,700

AEP Texas
Schedule C
Calculation of 2022 Over/Under Recovery Class Factor

2022 Residential Energy Efficiency Expenditures + R&D + EM&V- Municipal EECRF Expenses	\$9,474,852
2022 Actual Residential Energy Efficiency Factor Revenues	\$9,614,434
2022 Residential Over Recovery	(\$139,582)
2022 Commercial Energy Efficiency Expenditures + R&D + EM&V- Municipal EECRF Expenses	\$7,739,310
2022 Actual Commercial Energy Efficiency Factor Revenues	\$7,823,965
2022 Commercial Over Recovery	(\$84,654)
2022 Total Energy Efficiency Expenditures + R&D + EM&V- Municipal EECRF Expenses	\$17,214,162
2022 Actual Total Energy Efficiency Factor Revenues	\$17,437,948
2022 Over Recovery	(\$223,786)
less Transmission Class trailing under-recovery	(\$451)
Interest on 2022 Over Recovery	(\$2,941)
Total Over Recovery With Interest	(\$227,177)

Class	2022 Program Costs	2024 Forecasted Billing Unit	2024 Over/Under	
	Over/Under Recovery Allocation		Recovery Factor	Unit
Residential	(\$141,412)	13,418,124,430	(\$0.000011)	kWh
Secondary <= 10 kW	(\$32,438)	715,391,953	(\$0.000045)	kWh
Secondary > 10 kW	(\$152,878)	9,451,878,742	(\$0.000016)	kWh
Primary	\$39,951	4,258,139,342	\$0.000023	kWh
Transmission	\$0		\$0.000000	kWh
Lighting	\$0		\$0.000000	kWh
Total	(\$227,177)	27,843,534,457		

Over-Recovery Without Interest for 2024 Cap Purposes

Class	2022 Program Costs
	Over/Under Recovery Allocation
Residential	(\$139,582)
Secondary <= 10 kW	(\$32,018)
Secondary > 10 kW	(\$150,898)
Primary	\$36,263
Transmission	\$0
Total Without Interest	(\$224,235)

AEP Texas
Energy Efficiency Cost Recovery Factor

Schedule D
2022 Goal Achievement and Performance Bonus Calculation

AEP Texas achieved 53,404 kW in demand savings and 83,915,065 kWh in energy savings by January 1, 2023. The total present value of the avoided costs associated with these demand reductions and energy savings is \$86,739,023. AEP Texas' total costs for purposes of calculating the bonus for the 2022 program year were \$17,290,817. The resulting net benefits are \$60,774,931. AEP Texas' demand reduction goal (DRG) was 20,830 kW and its energy savings goal was 36,494,160 kWh. AEP Texas achieved 256% of its DRG and 230% of its energy savings goal, qualifying it for a performance bonus as calculated under 16 TAC § 25.182(e).

AEP Texas' calculated bonus is \$47,520,010; however, its maximum bonus allowed is \$6,077,493, which is 10% of its total net benefits (16 TAC § 25.182(e) (3)).

	kW (Demand)	kWh (Energy)
2022 Goals	20,830	36,494,160
2022 Savings	53,404	83,915,065
<i>Reported/Verified HTR</i>	2,141	
2022 Program Costs (excluding bonus)	\$17,290,817	
2022 Performance Bonus	\$6,077,493	

Performance Bonus Calculation

256%	Percentage of Demand Reduction Goal Met (Reported kW/Goal kW)
230%	Percentage of Energy Reduction Goal Met (Reported kWh/Goal kWh)
TRUE	Met Requirements for Performance Bonus?
\$86,739,023	Total Avoided Cost
\$8,683,275	Docket No. 48297 requirement (add previous bonus to current year bonus calculation)
\$25,964,092	Total Program Costs (including bonus)
\$60,774,931	Net Benefits

Bonus Calculation

\$47,520,010	Calculated Bonus [(Achieved Demand Reduction/Demand Goal - 100%) / 2 * Net Benefits]
\$6,077,493	Maximum Bonus Allowed (10% of Net Benefits)
\$6,077,493	Bonus (Minimum of Calculated Bonus and Bonus Limit)

Schedule E

Calculation of Requested EECRF by Customer Class Using Direct Assignment of EECRF Program Costs

AEP Texas Inc	Update	
2024 Program Costs	\$18,694,458	75.36%
EM&V Evaluation of PY 2023	\$233,450	0.94%
2022 Over Recovery	(\$224,236)	-0.90%
2022 Interest	(\$2,941)	-0.01%
Calculated Performance Bonus for 2022	\$5,077,493	24.47%
EECRF Proceeding Expenses DN 53679	\$55,305	0.22%
Adjusted EECRF Revenue Requirement	\$24,633,529	100.00%

Class	Total Adjusted 2024 EECR Revenue Requirement	2024 Forecasted Billing Unit	2024 EECR Factor	Unit
Residential	\$13,366,742	13,418,124,420	\$0.000596	kWh
Secondary <= 10 kW	\$490,484	715,391,953	\$0.000686	kWh
Secondary > 10 kW	\$8,583,182	9,451,878,742	\$0.000908	kWh
Primary	\$2,393,111	4,258,139,342	\$0.000562	kWh
Transmission	\$0	-	\$0.000000	kWh
Lighting	\$0	253,293,740	\$0.000000	kWh
Total	\$24,633,529			

Class	2024 EECRF Program Costs with EM&V	2022 Over/Under With Interest	2022 Bonus	EECRF Proceeding Expenses DN 53679	Total 2024 EECRF Revenue Requirement	2024 Forecasted Billing Unit	2024 EECR Factor	Unit
Residential	\$10,144,362	(\$141,412)	\$3,334,152	\$29,641	\$13,366,742	13,418,124,420	\$0.000596	kWh
Secondary <= 10 kW	\$407,620	(\$32,438)	\$114,122	\$1,191	\$490,484	715,391,953	\$0.000686	kWh
Secondary > 10 kW	\$6,698,619	(\$152,878)	\$2,017,854	\$19,573	\$8,583,182	9,451,878,742	\$0.000908	kWh
Primary	\$1,677,307	\$99,551	\$611,351	\$4,901	\$2,393,111	4,258,139,342	\$0.000562	kWh
Transmission	\$0	\$0	\$0	\$0	\$0	-	\$0.000000	kWh
Lighting	\$0	\$0	\$0	\$0	\$0	253,293,740	\$0.000000	kWh
Total	\$18,927,908	(\$227,177)	\$6,077,483	\$55,305	\$24,633,529			

Applicable: Certified Service Area
Chapter: 6 Section: 6.1.1
Section Title: Delivery System Charges
Revision: Fourth Effective Date: March 1, 2024

T

6.1.1.4.2 Rider EECRF – Energy Efficiency Cost Recovery Factors

AVAILABILITY

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

APPLICABILITY

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

MONTHLY RATE

<u>Rate Schedule</u>	<u>Factor</u>	
Residential Service	\$0.000996 per kWh	R
Secondary Service Less than or Equal to 10 kW	\$0.000686 per kWh	R
Secondary Service Greater than 10 kW	\$0.000908 per kWh	R
Primary Service	\$0.000562 per kWh	R
Transmission Service	\$0.000000 per kW	

NOTICE

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

Schedule G
Cap Calculation

AEP Texas	
2024 Program Costs (no EM&V cost)	\$18,694,458
2022 Over/Under Recovery without Interest	(\$224,236)
Calculated Performance Bonus - 2022	\$8,077,483
AEP Texas EECRF Proceeding Expenses	\$48,788
Adjusted EECR Revenue Requirement*	\$24,596,483

*no municipal EECRF proceeding expenses or EM&V costs or interest on the over/under recovery are included in the cap calculation

Class	Total Adjusted 2024 EECRF Revenue Requirement (no EM&V cost)	2024 Forecasted Billing Unit	2024 EECR Factor (no EM&V)	Unit
Residential	\$13,239,962	13,418,124,420	\$0.000987	kWh
Secondary <= 10 kW	\$485,746	715,391,993	\$0.000679	kWh
Secondary > 10 kW	\$8,500,229	9,451,878,742	\$0.000899	kWh
Primary	\$2,370,596	4,258,138,342	\$0.000557	kWh
Transmission	\$0	0	\$0.000000	kW
Total (no EM&V cost)	24,596,483	27,843,534,457		

South Urban CPI 8.58%

Class	2024 EECR Factor (no EM&V)	2023 Cap	2024 Cap
Residential	\$0.000987	\$0.001433	\$0.001556
Non-Residential	\$0.000787	\$0.000586	\$0.000873

Calculation of Non-Residential per kWh Rate	
2024 Rev Req	\$11,356,530
2024 kWh	14,426,410,037
Combined per kWh	\$0.000787

2021 Cap Analysis						
Class	Actual 2022 Program Costs*	2020 Performance Bonus	2020 OYU (less EM&V and interest)	2022 Billing kWh (less ID Notice)	2022 Cost Cap Based on Actuals	2022 Cap As Prescribed in §25.181(f)(5)(B)
Residential	\$9,358,834	\$4,816,508	\$205,950	12,987,591,522	\$0.001117	\$0.001364
Non-Residential	\$7,643,868	\$3,758,787	(\$77,076)	13,928,979,134	\$0.000813	\$0.000853
Total	\$17,002,803	\$8,673,275	\$128,874	26,896,570,656		

*less TetraTech EM&V costs & admin expenses

Schedule H

AEP Texas Projected 2024 Retail kWh Sales 37,592,888,483

Rate Classes	2022 Historical Billing Units	Percent of Total kWh	Customer ID Notice kWh	2024 Forecasted Billing Unit Less ID Notice Customers	Unit
Residential	12,967,581,522	35.89%		13,418,124,420	kWh
Secondary <= 10 kW	692,741,919	1.91%	1,417,987	715,391,953	kWh
Secondary > 10 kW	9,137,841,187	25.15%	3,438,330	9,451,878,742	kWh
Primary	4,456,078,060	12.27%	354,825,735	4,258,139,342	kWh
Transmission	8,829,811,054	24.30%		9,138,378,254	kWh
Lighting	244,789,054	0.67%		253,289,740	kWh
Total	36,330,652,796	100.00%	359,682,032	37,293,206,451	
			ID Notice kWh	359,682,032	
			Total 2024 kWh	37,592,888,483	

AEP Texas
Energy Efficiency Cost Recovery Factor

Schedule I

AEP Texas does not have energy efficiency costs in base rates.

**AEP Texas
2023 Energy Efficiency Cost Recovery Factor**

Schedule J

**2023 Energy Efficiency Service Providers
Who Received Incentives from the Energy Efficiency Programs in 2023**

A list of the energy service providers, those receiving more than 5% of the total incentive funds for 2023 and the associated contracts are provided.

The information provided in Schedule J is voluminous. The information is also CONFIDENTIAL, under the terms of the Protective Order. The Confidential 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, by parties to this case who have agreed to be bound by the Protective Order.

AEP Texas
Energy Efficiency Cost Recovery Factor

Schedule K

There are no affiliate costs in the AEP Texas filing.

AEP Texas
2024 Energy Efficiency Cost Recovery Factor

Schedule L
Bidding and Engagement Process

AEP Texas has several procedural paths through which it contracts with energy efficiency service providers (EESPs) for the purpose of implementing energy efficiency and demand response (EE/DR) programs to achieve its goals. The procedures and processes AEP Texas uses differs according to the program type, as shown in more detail below.

Standard Offer Program (SOP) Process

AEP Texas posts specific program application procedures and timelines along with program manuals on its web site (aeptexas.com/save). In accordance with the published schedule, EESPs may submit their project applications and all supplemental documentation required for participation in a program.

As part of the application process, EESPs describe the project measures to be installed, including applicable measurement and verification methods (M&V). As required, the M&V plan may include approved deemed savings values or the appropriate International Performance Measurement and Verification Protocol (IPMVP) to be utilized.

AEP Texas reviews each Project Application on a first-come, first-served basis. AEP Texas awards contracts based upon each EESP's timely and complete submission of qualifications, history and appropriate reference information, and potential ability to help meet program goals. AEP Texas may request clarification of, or additional information about any item submitted as part of the Project Application. A Project Application may be rejected for failure to meet the required procedures or deadlines.

Each EESP is notified of its application status according to program procedures and, if approved as a Project Sponsor, the associated incentive budget. For residential projects, AEP Texas and the approved Project Sponsor enter into a standard offer agreement contract. When the SOP agreement is fully executed, the Project Sponsors may begin to solicit and engage residential customers to implement eligible EE measures.

EESPs or qualified commercial customers identify and submit applications for the installation of EE measures at commercial customer sites. Applications are reviewed as described above. AEP Texas and the approved Project Sponsor enter into a standard offer agreement for the implementation of the EE measures or projects at commercial customer sites.

AEP Texas
2024 Energy Efficiency Cost Recovery Factor

Schedule L
Bidding and Engagement Process

Market Transformation Program (MTP) Process

AEP Texas may implement an MTP as a full program or as a limited MTP pilot. Programs may be selected based on a concept presented by an EESP or from observation of successful programs already implemented at another utility. For programs proposed by an EESP that are deemed viable, A may contract with the initiating EESP to implement the program on a limited pilot basis for a period typically no longer than two years.

When a pilot program has been deemed successful by AEP Texas and a baseline study has been completed, a competitive solicitation process is implemented. A Request for Proposals (RFP) is developed and may be posted on industry-related websites and/or may be sent electronically to all EESPs who have contacted AEP Texas and expressed an interest in implementing such programs in the Texas market.

Interested EESPs submit program proposals according to the published requirements and schedule. AEP Texas forms an internal proposal evaluation and scoring team, and all proposals are individually evaluated according to standard scoring criteria. References submitted by EESPs are contacted and interviewed. Scoring and reference results are consolidated and the EESP proposal with the highest score is selected for further negotiation as the program implementer.

AEP Texas
2024 Energy Efficiency Cost Recovery Factor

SCHEDULE M

Residential & Commercial EULs

Sector	TRM Measure	Energy Efficiency Measure	EUL (years)	TRM Version
Custom	NA	Custom	NA	NA
Residential	2.1.1	Res Energy Star Omni-Directional LED Lamps (Standard Baseline)	8.0	9.0
Residential	2.1.1	Res Energy Star Omni-Directional LED Lamps (Low Income Baseline)	10.0	9.0
Residential	2.1.2	Res Energy Star Specialty and Directional LED Lamps (EISA Compliant, Standard Baseline)	8.0	9.0
Residential	2.1.2	Res Energy Star Specialty and Directional LED Lamps (EISA Compliant, Low Income Baseline)	10.0	9.0
Residential	2.1.2	Res Energy Star Specialty and Directional LED Lamps (Non-EISA Compliant, 15,000 hour Rated Measure Life)	16.0	9.0
Residential	2.1.2	Res Energy Star Specialty and Directional LED Lamps (Non-EISA Compliant, 30,000 hour Rated Measure Life)	20.0	9.0
Residential	2.2.1	Res AC or HP Tune-Ups	5.0	9.0
Residential	2.2.2	Res Duct Efficiency Improvement	18.0	9.0
Residential	2.2.3	Res Ground Source Heat Pumps	20.0	9.0
Residential	2.2.4	Res Central Air Conditioners	18.0	9.0
Residential	2.2.4	Res Central Heat Pumps	15.0	9.0
Residential	2.2.5	Res Mini-Split Air Conditioners	18.0	9.0
Residential	2.2.5	Res Mini-Split Heat Pumps	15.0	9.0
Residential	2.2.6	Res Large Capacity Split System and Single-Package AC	18.0	9.0
Residential	2.2.6	Res Large Capacity Split System and Single-Package HP	15.0	9.0
Residential	2.2.7	Res PTHPs	15.0	9.0
Residential	2.2.8	Res Room Air Conditioners	10.0	9.0
Residential	2.2.9	Res Connected Thermostats	11.0	9.0
Residential	2.2.10	Res Smart Thermostat Load Management	1.0	9.0
Residential	2.2.11	Res Evaporative Cooling	15.0	9.0
Residential	2.3.1	Res Air Infiltration	11.0	9.0
Residential	2.3.2	Res Ceiling Insulation	25.0	9.0
Residential	2.3.3	Res Attic Encapsulation	25.0	9.0
Residential	2.3.4	Res Wall Insulation	25.0	9.0
Residential	2.3.5	Res Floor Insulation	25.0	9.0
Residential	2.3.6	Res Windows	25.0	9.0
Residential	2.3.7	Res Low-E Storm Windows	20.0	9.0
Residential	2.3.8	Res Solar Screens	10.0	9.0
Residential	2.3.9	Res Cool Roofs	15.0	9.0
Residential	2.4.1	Res Faucet Aerators	10.0	9.0
Residential	2.4.2	Res Low-Flow Showerheads	10.0	9.0
Residential	2.4.3	Res DHW Pipe Insulation	13.0	9.0
Residential	2.4.4	Res DHW Tank Insulation	7.0	9.0
Residential	2.4.5	Res DHW Installation: Electric Tankless	20.0	9.0
Residential	2.4.5	Res DHW Installation: Gas (Fuel Substitution)	11.0	9.0
Residential	2.4.6	Res Heat Pump Water Heater	13.0	9.0
Residential	2.4.7	Res DHW Replacement: Solar	15.0	9.0
Residential	2.4.8	Res Showerhead TSRVs	10.0	9.0
Residential	2.4.9	Res Tub Spout/Showerhead TSRVs	10.0	9.0
Residential	2.5.1	Res Ceiling Fans	10.0	9.0
Residential	2.5.2	Res Clothes Washer	11.0	9.0
Residential	2.5.3	Res Clothes Dryers	16.0	9.0
Residential	2.5.4	Res Dishwashers	15.0	9.0
Residential	2.5.5	Res Refrigerators	16.0	9.0
Residential	2.5.6	Res Freezers	22.0	9.0
Residential	2.5.7	Res Pool Pumps	10.0	9.0
Residential	2.5.8	Res Air Purifiers	9.0	9.0
Residential	2.5.9	Res Advanced Power Strips	10.0	9.0
Residential	2.5.10	Res Electric Vehicle Supply Equipment	10.0	9.0
Residential	2.5.11	Res Refrigerator/Freezer Recycling	8.0	9.0
Commercial	2.1.1	Com Lamps and Fixtures: Halogen Lamps	1.5	9.0
Commercial	2.1.1	Com Lamps and Fixtures: High Intensity Discharge Lamps	15.0	9.0
Commercial	2.1.1	Com Lamps and Fixtures: Integrated ballast CCFL Lamps	4.5	9.0
Commercial	2.1.1	Com Lamps and Fixtures: Integrated ballast CFL Lamps	2.5	9.0
Commercial	2.1.1	Com Lamps and Fixtures: Integral LED Lamps	9.0	9.0
Commercial	2.1.1	Com Lamps and Fixtures: LED Fixtures	15.0	9.0
Commercial	2.1.1	Com Lamps and Fixtures: LED Corn Cobs	15.0	9.0
Commercial	2.1.1	Com Lamps and Fixtures: LED Tubes	15.0	9.0
Commercial	2.1.1	Com Lamps and Fixtures: Modular CFL/CCFL Fixtures	15.0	9.0
Commercial	2.1.1	Com Lamps and Fixtures: T8/T5 Linear Fluorescents	15.0	9.0
Commercial	2.1.1	Com New Construction Interior Fixtures/Controls	14.0	9.0
Commercial	2.1.1	Com New Construction Exterior Fixtures	15.0	9.0
Commercial	2.1.2	Com Lighting Controls (Occupancy Sensor)	10.0	9.0
Commercial	2.1.2	Com Lighting Controls (Daylighting Control)	10.0	9.0
Commercial	2.1.2	Com Lighting Controls (Time Clock)	10.0	9.0
Commercial	2.1.2	Com Lighting Controls (Tuning Control)	10.0	9.0
Commercial	2.1.2	Com Lighting Controls (New Construction)	14.0	9.0

**AEP Texas
2024 Energy Efficiency Cost Recovery Factor**

SCHEDULE M

Residential & Commercial EULs

Commercial	2.1.3	Com LED Traffic Signals: 8" and 12" Red, Green, and yellow Ball	6.0	9.0
Commercial	2.1.3	Com LED Traffic Signals: 8" and 12" Red, Green, and yellow Arrow	6.0	9.0
Commercial	2.1.3	Com LED Traffic Signals: Large (16"x18") Pedestrian Signal	5.0	9.0
Commercial	2.1.3	Com LED Traffic Signals: Small (12"x12") Pedestrian Signal	5.0	9.0
Commercial	2.2.1	Com ACHP Tune-Up	5.0	9.0
Commercial	2.2.2	Com Split/Packaged A/Cs and HPs	15.0	9.0
Commercial	2.2.3	Com HVAC Chillers: Screw/Scroll/Reciprocating	20.0	9.0
Commercial	2.2.3	Com HVAC Chillers: Centrifugal	25.0	9.0
Commercial	2.2.4	Com FTAC/PTHPs	15.0	9.0
Commercial	2.2.4	Com Room Air Conditioners	10.0	9.0
Commercial	2.2.5	Com Computer Room Air Conditioners	15.0	9.0
Commercial	2.2.6	Com Computer Room Air Handler Motor Efficiency	15.0	9.0
Commercial	2.2.7	Com HVAC VFDs	15.0	9.0
Commercial	2.2.8	Com Condenser Air Evaporative Pre-Cooling	10.0	9.0
Commercial	2.2.9	Com High-Volume Low-Speed Fans	9.0	9.0
Commercial	2.2.10	Com Evaporative Cooling (Small Commercial)	15.0	9.0
Commercial	2.3.1	Com Cool Roofs	15.0	9.0
Commercial	2.3.2	Com Window Film	10.0	9.0
Commercial	2.3.3	Com Entrance/Exit Door Air Infiltration	11.0	9.0
Commercial	2.4.1	Com Combination Ovens	12.0	9.0
Commercial	2.4.2	Com Electric Convection Ovens	12.0	9.0
Commercial	2.4.3	Com Dishwashers (Under Counter)	10.0	9.0
Commercial	2.4.3	Com Dishwashers (Stationary Single Tank Door)	15.0	9.0
Commercial	2.4.3	Com Dishwashers (Single Tank Conveyor)	20.0	9.0
Commercial	2.4.3	Com Dishwashers (Multiple Tank Conveyor)	20.0	9.0
Commercial	2.4.3	Com Dishwashers (Pot, Pan, and Utensil)	10.0	9.0
Commercial	2.4.4	Com Hot Food Holding Cabinets	12.0	9.0
Commercial	2.4.5	Com Electric Fryers	12.0	9.0
Commercial	2.4.6	Com Electric Steam Cookers	12.0	9.0
Commercial	2.4.7	Com Ice Makers	8.5	9.0
Commercial	2.4.8	Com Demand Controlled Kitchen Ventilation	15.0	9.0
Commercial	2.4.9	Com Pre-Rinse Spray Valves	5.0	9.0
Commercial	2.4.10	Com Vacuum Sealing and Packaging Machines	10.0	9.0
Commercial	2.5.1	Com Door Heater Controls	12.0	9.0
Commercial	2.5.2	Com ECM Evaporator Fan Motors	15.0	9.0
Commercial	2.5.3	Com Electronic Defrost Controls	10.0	9.0
Commercial	2.5.4	Com Evaporator Fan Controls	16.0	9.0
Commercial	2.5.5	Com Night Covers	5.0	9.0
Commercial	2.5.6	Com Solid/Glass Door Reach-ins	12.0	9.0
Commercial	2.5.7	Com Strip Curtains	4.0	9.0
Commercial	2.5.8	Com Zero-Energy Doors	12.0	9.0
Commercial	2.5.9	Com Door Gaskets	3.0	9.0
Commercial	2.5.10	Com High Speed Doors for Cold Storage	5.0	9.0
Commercial	2.6.1	Com Central DHW Controls	15.0	9.0
Commercial	2.6.2	Com Showerhead TSPVs	10.0	9.0
Commercial	2.6.3	Com Tub Spout/Showerhead TSPVs	10.0	9.0
Commercial	2.7.1	Com Vending Machine Controls	5.0	9.0
Commercial	2.7.2	Com Lodging Guest Room Occupancy Sensors	10.0	9.0
Commercial	2.7.3	Com Pump-Off Controllers	15.0	9.0
Commercial	2.7.4	Com Pool Pumps	10.0	9.0
Commercial	2.7.5	Com PC Power Management	3.0	9.0
Commercial	2.7.6	Com Premium Efficiency Motors	15.0	9.0
Commercial	2.7.7	Com Electric Vehicle Supply Equipment	10.0	9.0
Commercial	2.7.8	Com VFDs for Water Pumping	12.5	9.0
Commercial	2.7.9	Com Steam Trap Repair and Replacement (standard)	6.0	9.0
Commercial	2.7.9	Com Steam Trap Repair and Replacement (venturi)	20.0	9.0
Commercial	2.7.10	Com Hydraulic Gear Lubricants	10.0	9.0
Commercial	2.7.11	Com Hydraulic Oils	10.0	9.0
Measurement and V	2.1.1	M&V AC Tune-Ups	5.0	9.0
Measurement and V	2.1.2	M&V Ground Source Heat Pumps	20.0	9.0
Measurement and V	2.1.3	M&V Variable Refrigerant Flow Systems	15.0	9.0
Measurement and V	2.2.1	M&V Res New Construction	23.0	9.0
Measurement and V	2.3.1	M&V Res Solar PV	30.0	9.0
Measurement and V	2.3.2	M&V Non-Res Solar PV	30.0	9.0
Measurement and V	2.3.3	M&V Solar Shingles	20.0	9.0
Measurement and V	2.3.4	M&V Solar Attic Fans	15.0	9.0
Measurement and V	2.4.1	M&V Behavioral	1.0	9.0
Measurement and V	2.4.2	M&V Air Compressors (less than 75hp)	10.0	9.0
Measurement and V	2.4.3	M&V Non-Res Retro-Commissioning	5.0	9.0
Measurement and V	2.4.4	M&V Thermal Energy Storage	15.0	9.0
Measurement and V	2.5.1	M&V Res Load Curtailment	1.0	9.0
Measurement and V	2.5.2	M&V Non-Res Load Curtailment	1.0	9.0

AEP Texas
2024 Energy Efficiency Cost Recovery Factor

Schedule N

2024 Projected Energy Efficiency Goals and Objectives

Average Peak Demand at Meter (MW)	Goal Metric: 0.4% Peak Demand (MW)	Peak Demand Goal (MW)	Energy Goal (MWh)	Projected Demand Reduction (MW)	Projected Energy Savings (MWh)
5,387	21.55	21.55	37,756	60.93	76,758

AEP Texas
2024 Energy Efficiency Cost Recovery Factor

Schedule O

2024 Projected Energy Efficiency Program Savings

Customer Class and Program	2024	
	Demand Reduction Target (MW)	Energy Savings Target (MWh)
Commercial		
Commercial Food Service Pilot MTP	40.83	276,622
Commercial Solutions MTP	1,664	7,458,262
Commercial SOP	3,133	16,316,286
CoolSaver [®] A/C Tune-Up MTP	3,466	8,047,475
Load Management SOP	26,308	26,308
Open MTP	1,215	5,234,159
SCORE/CitySmart MTP	2,463	8,259,385
SMART Source SM Solar PV MTP	269	903,022
Winter Load Management SOP	12,768	12,768
Residential		
CoolSaver [®] A/C Tune-Up MTP	1,594	6,250,000
High-Performance New Homes MTP	2,215	3,703,316
Residential SOP	2,785	11,187,718
SMART Source SM Solar PV MTP	759	2,484,661
Hard-to-Reach		
Hard-to-Reach SOP	1,408	5,065,232
Targeted Low-Income Energy Efficiency Program	840	1,532,434
Total Annual Projected Savings	60,929	76,757,648

AEP Texas
2024 Energy Efficiency Cost Recovery Factor

SCHEDULE P

2022 Energy Efficiency Programs' Cost - Net Benefit Ratio

Program Cost-effectiveness Summary								
Year	Savings		Costs	Benefits				Benefit-Cost
Customer Class and Program	kW	kWh	Total Program Costs	Avoided Capacity Costs	Avoided Energy Costs	Total Avoided Cost	Net Benefits	Ben-Cost Ratio
Commercial	43,467.6	51,119,335.2	11,779,683.7	11,581,336.4	39,216,864.3	50,797,700.6	39,018,016.9	
Commercial Solutions	1,649	7,980,776	\$ 1,512,769	\$ 1,363,248	\$ 6,991,568	\$ 8,354,816	\$ 6,842,048	5.52
Commercial SOP	3,131	15,955,810	\$ 3,250,798	\$ 2,512,441	\$ 13,414,663	\$ 15,927,104	\$ 12,676,306	4.90
CoolSaver - Commercial	5,711	11,685,066	\$ 1,468,583	\$ 2,013,401	\$ 4,376,987	\$ 6,390,388	\$ 4,921,805	4.35
Load Management SOP	28,968	28,968	\$ 1,395,213	\$ 2,220,563	\$ 2,359	\$ 2,222,922	\$ 827,709	1.59
Open MTP	1,252	4,629,866	\$ 1,823,555	\$ 1,021,081	\$ 4,038,575	\$ 5,059,656	\$ 3,236,102	2.77
SCORE/CitySmart	2,437	9,927,928	\$ 2,024,690	\$ 2,026,823	\$ 8,969,649	\$ 10,996,472	\$ 8,971,782	5.43
Solar - Commercial	320	1,010,922	\$ 304,076	\$ 423,779	\$ 1,422,563	\$ 1,846,342	\$ 1,542,266	6.07
Residential	7,796	26,316,690	8,936,352	7,310,266	21,722,907	29,033,173	20,096,821	
CoolSaver - Residential	1,522	7,753,843	\$ 1,395,805	\$ 576,301	\$ 3,025,933	\$ 3,602,234	\$ 2,206,429	2.58
High - Performance Homes	2,657	4,578,039	\$ 1,461,548	\$ 3,046,502	\$ 5,503,882	\$ 8,550,384	\$ 7,088,836	5.85
Residential SOP	2,720	10,761,775	\$ 5,034,342	\$ 2,499,325	\$ 8,657,657	\$ 11,156,982	\$ 6,122,640	2.22
Solar - Residential	897	3,223,034	\$ 1,044,658	\$ 1,188,139	\$ 4,535,434	\$ 5,723,573	\$ 4,678,915	5.48
Hard-to-Reach	2,141	6,479,039	5,241,519	1,813,080	5,095,070	6,908,150	1,666,631	
Hard to Reach SOP	1,470	5,247,286	\$ 2,438,868	\$ 1,194,454	\$ 3,921,941	\$ 5,116,394	\$ 2,677,526	2.10
Targeted Low Income Program	671	1,231,753	\$ 2,802,650	\$ 618,626	\$ 1,173,129	\$ 1,791,756	\$ (1,010,895)	0.64
Portfolio Total	53,404	83,915,065	25,957,555	20,704,683	66,034,341	86,739,023	60,781,469	3.34

AEP Texas Inc.
Adjusted Energy Efficiency Cost Recovery Factor Filing

Schedule Q (Losses)

Schedule Q
System and Line Losses

The AEP Texas kWh sales forecast for 2024 is based on energy delivered at the meter so it was not necessary to adjust the EECRF factors for system and line losses.

AEP Texas
2024 Energy Efficiency Cost Recovery Factor

Schedule R

2024 Energy Efficiency Programs

Program	Customer Class	Description
Commercial Food Service Pilot MTP	Commercial	The Foodservice MTP targets commercial foodservice participants and market actors. This program will feature a point-of-sale rebate at the foodservice equipment dealer and will engage other key market actors to stimulate the adoption of energy efficient equipment.
Commercial Solutions MTP	Commercial	Provides energy efficiency and demand reduction solutions for commercial customers identified as having a need for energy efficiency improvements and needing support from an outside source. Facilitates the identification of demand and energy savings opportunities, operating characteristics, program design, long-range energy efficiency planning and overall measure and program acceptance by the targeted customers. Incentives are paid to participating customers for eligible measures installed in new or retrofit applications, which provide verifiable demand and energy savings.
Commercial SOP	Commercial	Provides incentives for the installation of a wide range of measures that reduce customer energy costs and reduce peak demand and/or save energy in non-residential facilities. Customer sites may include hotels, schools, manufacturing facilities, restaurants, and larger grocery stores. Eligible measures as lighting, new or replacement chiller systems, high efficiency pumping systems, and other similar technologies. Incentives are paid to project sponsors based on deemed savings or on verified peak demand and/or energy savings using the International Performance Measurement and Verification Protocol.
CoolSever A/C Tune-up MTP	Commercial & Residential	Offers assistance to contractors in obtaining the tools and expertise that will allow them to develop quantitative savings information for comprehensive tune-ups. This program targets contractors that provide air conditioning system tune-up services to residential and commercial customers. The program also provides incentives for residential high efficiency air conditioner heat pump replacements. The program implementer targets various air conditioning equipment distributor networks and organizations by phone and site visits to gauge their interest in the program.
Hard-to-Reach SOP	Hard-to-Reach	Targets a specific subset of residential customers defined by 16 FAC § 25.181(c)(27) as customers with a total household income that is less than 200% of the federal poverty guidelines. The program provides incentives for the installation of a wide range of measures that reduce residential customer energy costs and peak demand. It is designed to cost-effectively provide energy efficiency improvements to individual households at no or very low cost. Eligible measures include replacement air conditioners, wall and ceiling insulation and air distribution duct improvements in existing homes. Incentives are paid to Energy Efficiency Service Providers (EESPs) for eligible measures on the basis of deemed savings.
High Performance New Homes MTP	Residential	Targets homebuilders and residential consumers. The program's goal is to create conditions where consumers are demand ENERGY STAR qualified homes. Incentives are paid to homebuilders who construct homes to strict energy efficient building guidelines that are at least 10% above the local building code.
Load Management SOP	Commercial	Targets commercial customers that have a minimum demand of 500 kW or more. Incentives are paid to project sponsors that can identify and interrupt electric load on short notice. These payments are based on the verified demand savings methodology identified in the Texas TRM.
Open MTP	Commercial	Targets small commercial customers (peak demands not exceeding 100 kW in the previous 12 consecutive billing months) with limited ability to implement energy efficiency measures or to actively seek the help of a professional EESP. Available incentives are paid directly to the contractor, thereby reducing a portion of the project cost for the customer.
Residential SOP	Residential	Provides incentives for the installation of a wide range of measures that reduce residential customer energy costs and cost-effectively reduce peak demand. It is also designed to encourage private sector delivery of energy efficient products and services. Eligible measures include replacement air conditioners, wall and ceiling insulation and air distribution duct improvements. Incentives are paid to Project Sponsors for eligible measures installed in retrofit applications on the basis of deemed savings.
SCOREs/CitySmart MTP	Commercial	Provides energy efficiency and demand reduction solutions for governmental and educational customers. SCOREs/CitySmart will facilitate the identification of demand and energy savings opportunities, operating characteristics, long-range energy efficiency planning and overall measure and program acceptance by the targeted customers. Incentives are paid to governmental and educational customers for certain measures installed in new or retrofit applications, which provide verifiable demand and energy savings.
SMART Source SM Solar PV MTP	Commercial & Residential	Provides incentives for residential and commercial customers that install solar electric (photovoltaic) systems interconnected on the customer's side of the electric service meter.
Targeted Low-Income Energy Efficiency Program	Low-Income Residential	Designed to cost-effectively reduce the energy consumption and energy costs of participating low-income customers. The program provides eligible residential customers with appropriate weatherization measures and basic on-site energy education. This program enhances and supplements the federally funded Weatherization Assistance Program.
Winter Load Management SOP	Commercial	The WLM SOP targets non-residential customers with a peak electric demand of 500 kW or more and able to reduce at least 100 kW demand or more during a curtailment event. Curtailment events occur during the program operating period December 1 through February 28, 24 hours a day, seven days a week. Program participants include non-residential customers and Market Actors that include national or local energy efficiency service providers, commercial aggregation groups and retail electric providers (REPs). Load curtailment events are dispatched by AEP Texas to the program participants providing a 30-minute advance notification and will have a one-to-four-hour duration. Incentive payments are based on the average measured and verified demand reduction during the program operating period.

AEP Texas Inc.
2023 Energy Efficiency Plan and Report
16 Tex. Admin. Code §§ 25.181, 28.182 and 25.183

Amended June 1, 2023

Project No. 54470



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