



## **Filing Receipt**

**Filing Date - 2025-05-01 01:33:58 PM**

**Control Number - 58014**

**Item Number - 2**

**PUC DOCKET NO. 58014**

<b>APPLICATION OF SOUTHWESTERN ELECTRIC POWER COMPANY TO ADJUST ITS ENERGY EFFICIENCY COST RECOVERY FACTOR AND RELATED RELIEF</b>	<b>§ § § § §</b>	<b>PUBLIC UTILITY COMMISSION  OF TEXAS</b>
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**May 1, 2025**

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<b>ELECTRIC POWER COMPANY TO</b>	<b>§</b>	<b>PUBLIC UTILITY COMMISSION</b>
<b>ADJUST ITS ENERGY EFFICIENCY</b>	<b>§</b>	
<b>COST RECOVERY FACTOR AND</b>	<b>§</b>	<b>OF TEXAS</b>
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<b>RELATED RELIEF</b>	<b>§</b>	

**SOUTHWESTERN ELECTRIC POWER COMPANY'S APPLICATION**

Southwestern Electric Power Company (SWEPCO) files its Application to Adjust its Energy Efficiency Cost Recovery Factor and Related Relief pursuant to Public Utility Regulatory Act (PURA)<sup>1</sup> § 39.905 and 16 Tex. Admin. Code § 25.182 (TAC). In support of its application, SWEPCO shows the following:

**I. Applicant**

SWEPCO is an electric utility that owns and operates for compensation in Texas equipment and facilities to generate, transmit, distribute, sell, and furnish electricity in Texas. In particular, SWEPCO provides service to end-use customers in areas comprising all or parts of 19 counties in northeast Texas and five counties in north Texas. SWEPCO's business address is 428 Travis Street, Shreveport, Louisiana 71101.

**II. Authorized Representatives**

SWEPCO's authorized legal representatives are:

George G. Hoyt	Stephanie Green
American Electric Power Service Corporation	Duggins Wren Mann & Romero, LLP
400 West 15th Street, Suite 1520	P.O. Box 1149
Austin, Texas 78701	Austin, Texas 78767
Telephone: (512) 481-4545	Telephone: (512) 744-9300
Facsimile: (512) 481-4591	Facsimile: (512) 744-9399
Email: <a href="mailto:ghoyt@aep.com">ghoyt@aep.com</a>	Email: <a href="mailto:sgreen@dwmrlaw.com">sgreen@dwmrlaw.com</a>
<a href="mailto:aepaustintx@aep.com">aepaustintx@aep.com</a> (Service)	

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<sup>1</sup> Public Utility Regulatory Act, Tex. Util. Code §§ 11.001 – 66.016.

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

### **III. Jurisdiction**

The Commission has jurisdiction over this application pursuant to PURA § 39.905 and 16 TAC § 25.182.

### **IV. Affected Persons**

SWEPCO provides service to approximately 191,000 customers in Texas. SWEPCO proposes to apply the adjusted EECRF requested in this application to all of its retail electric customers in its Texas service areas who take service below 69,000 volts, with the exception of industrial distribution customers who filed a notice of intent pursuant to 16 TAC § 25.181(u) and lighting customers, for whom no energy efficiency programs are available.

### **V. Background**

In Docket No. 56552, the Commission authorized SWEPCO to adjust its EECRF pursuant to PURA § 39.905 and 16 TAC § 25.182(d)(1) to recover \$5,909,333 during program year 2025.<sup>2</sup> This included \$4,842,484 for projected energy efficiency costs for 2025 programs; \$36,913 in projected Evaluation, Measurement, & Verification (EM&V) expenses for program year 2024; \$21,789 for SWEPCO's rate-case expenses incurred in its previous EECRF proceeding, Docket No. 54948; and \$1,132,539, the amount of SWEPCO's performance bonus achieved by its 2023 energy efficiency results. SWEPCO's approved 2024 EECRF also included an adjustment of \$117,187, plus \$7,205 in interest, for the over-recovery of energy efficiency costs incurred in Program Year 2023.

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<sup>2</sup> *Application of Southwestern Electric Power Company To Adjust Energy Efficiency Cost Recovery Factor (EECRF) and Related Relief* Docket No. 56552, Final Order at Ordering Paragraph No. 2 (Nov. 14, 2024).

16 TAC § 25.182(d)(8) requires a utility such as SWEPCO, which serves in an area in which customer choice is not offered, to apply to adjust its EECRF no later than May 1 of each year.

**VI. Request to Adjust the EECRF**

SWEPCO requests the authority to update its EECRF to adjust the cost recovery factors for energy efficiency for Program Year 2026 to collect \$8,617,775, which reflects the following five components:

- recovery of \$4,842,484 in projected energy efficiency program costs for SWEPCO's 2025 programs;
- an adjustment of \$94,852 plus \$9,891 in interest for the under-recovery of 2024 program costs;
- EM&V costs of \$38,976;
- recovery of \$3,605,072 representing SWEPCO's performance bonus for achieving demand and energy savings that exceeded the goal to be achieved in 2024; and
- recovery of \$26,480 representing SWEPCO's 2024 proceeding expenses incurred in Docket No. 56552.

**VII. Adjusted EECRF Cost Recovery Factors for 2026**

The adjusted Schedule EECRF containing the cost recovery factors for 2026 is provided as Attachment A to this application. SWEPCO requests that the Commission make the adjusted Schedule EECRF effective as of January 1, 2026. The requested adjusted EECRF cost recovery factors to recover the applicable energy efficiency costs during 2026 are as follows:

EECRF Rate Class	kWh Factor
Residential	\$0.002343
General Service	\$0.002324
Lighting and Power	\$0.001029
Municipal Pumping	\$0.000124
Municipal Service	\$0.001330
Cotton Gin	(\$0.000276)
Large Lighting and Power < 69 kV	\$0.003805
Metal Melting < 69 kV	\$0.007107
Oil Field Large Industrial Power	\$0.000326
Lighting	\$0.000000

### **VIII. Request for Good Cause Exception**

SWEPCO requests that the Commission grant a good cause exception pursuant to 16 TAC §§ 25.181(e)(2) and 25.182(d)(7) to establish revised EECRF residential and commercial cost caps for the 2026 Program Year. SWEPCO seeks this relief because it is not reasonably possible to comply with the applicable cost caps while maintaining its current levels of energy efficiency programs and customer benefits. Good cause exists to establish a revised cost cap to enable SWEPCO to continue offering the same valuable energy-efficiency programs and level of achievements and customer benefits at its proposed budget levels, which are consistent with those the Commission most recently found to be reasonable and cost effective in Docket No. 56552. SWEPCO's good cause exception request is described further in the Direct Testimony of Robert Paddy.

### **IX. Testimony and Schedules Supporting 2025 EECRF**

Accompanying this application are the direct testimonies of Jonathan Griffin, Montana Fichtel, and Robert Paddy, and Schedules A through S. The evidence sponsored by Messrs. Fichtel, Griffin, and Paddy fully supports the relief sought by SWEPCO for Program Year 2026 in accordance with PURA § 39.905 and 16 TAC § 25.182.

**X.        Request for Protective Order**

Schedule J contains a listing of all Energy Efficiency Service Providers (EESPs) who received incentive funds and a listing of EESPs who received more than five percent of incentive funds for 2024 along with their contracts with SWEPCO. 16 TAC § 25.182 (d)(10)(H) and (K) provide that such information may be treated as confidential. Accordingly, SWEPCO requests entry of the Commission's standard Protective Order provided as Attachment B to this application.

**XI.        Notice**

In accordance with 16 TAC § 25.182(d)(13), SWEPCO proposes to provide notice within seven days of the filing date by providing a copy of this application by email or U.S. mail to all parties to SWEPCO Docket No. 51415, SWEPCO's most recent completed base rate case, and Docket No. 56552, SWEPCO's last EECRF case; and the Texas Department of Housing and Community Affairs. In accordance with 16 TAC § 25.182(d)(14), SWEPCO will file an affidavit attesting to the completion of notice within 14 days after the application is filed.

**XII.        Proposed Schedule**

SWEPCO proposes the following schedule for this proceeding:

Notice Completed	May 8, 2025
Proof of Notice	May 15, 2025
Intervention Deadline	May 30, 2025
Request for a Hearing	May 30, 2025
	<u>If No Hearing Requested</u>
Staff Recommendation	June 13, 2025
Parties' Proposed Order	June 20, 2025
	<u>If Hearing Requested</u>
End of discovery on SWEPCO Direct (If Hearing Requested)	May 30, 2025
Deadline for Intervenor Direct	June 19, 2025



Objections to SWEPCO and Intervenor Direct	June 26, 2025
Deadline for Staff Direct	July 1, 2025
End of Discovery on Intervenor Direct	July 1, 2025
End of Discovery on Staff Direct	July 8, 2025
Replies to Objections to SWEPCO and Intervenor Direct	July 8, 2025
Objections to Staff Direct	July 8, 2025
Discovery Responses on Intervenor Direct	July 11, 2025
Deadline for SWEPCO Rebuttal and Cross-Rebuttal	July 18, 2025
Discovery Responses on Staff Direct	July 18, 2025
Hearing on the Merits	July 25, 2025

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

WHEREFORE, PREMISES CONSIDERED, SWEPCO prays that the Commission:

- (i) approve the proposed Protective Order;
- (ii) approve SWEPCO's proposed method of providing notice;
- (iii) approve SWEPCO's proposed Schedule EECRF, provided as Attachment A to this application;
- (iv) approve SWEPCO's proposed procedural schedule;
- (v) authorize SWEPCO to begin applying the adjusted Schedule EECRF as of January 1, 2026;
- (vi) grant SWEPCO's application; and
- (vii) grant such other and further relief to which SWEPCO may show itself justly entitled.

Dated: May 1, 2025

RESPECTFULLY SUBMITTED,

/s/ Stephanie Green

George G. Hoyt  
State Bar No. 24049270  
400 West 15<sup>th</sup> Street, Suite 1520  
Austin, Texas 78701  
Email: [ghoyt@aep.com](mailto:ghoyt@aep.com)  
**AMERICAN ELECTRIC POWER SERVICE  
CORPORATION**

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P.O. Box 1149  
Austin, Texas 78767  
Telephone: (512) 744-9300  
Facsimile: (512) 744-9399 (fax)  
**DUGGINS WREN MANN & ROMERO, LLP**

**ATTORNEYS FOR SOUTHWESTERN  
ELECTRIC POWER COMPANY**

## **SOUTHWESTERN ELECTRIC POWER COMPANY**

Tariff Manual - Public Utility Commission of Texas

Section Title: Rates, Charges, and Fees

Section No: IV

Applicable: All Areas

Docket No: 58014

Sheet No: IV-35

Effective Date: January 1, 2026

Revision 18

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### **ENERGY EFFICIENCY COST RECOVERY RIDER**

#### **APPLICABILITY**

Rider Energy Efficiency Cost Recovery Factor (EECRF) recovers the cost of energy efficiency programs not included in base rates and is applicable to the kWh of Retail Customers taking retail service from the Company. The EECRF does not apply to customers taking service at transmission voltage or exempt industrial distribution customers unless there is a true-up from a prior period. 16 Tex. Admin. Code 25.182(d)(8) provides that no later than May 1 of each year, a utility with an EECRF shall apply to adjust the EECRF in order to adjust for changes in costs and bonuses and to minimize any over- or under-collections of energy efficiency costs resulting from the use of the EECRF. The EECRF filed by May 1 of each year will be calculated in accordance with the following methodology and will be applied to the billing kWh billed by the Company.

#### **AVAILABILITY**

The following factors will be applied to the energy usage (metered or unmetered) of retail customers taking service from the Company.

#### **MONTHLY RATE**

<u>Rate Schedule<sup>1</sup></u>	<u>Rate Code<sup>2</sup></u>	<u>Factor per kWh</u>	
Residential	12,15,16,19,32,38,61,62	\$0.002343	I
General Service <sup>3</sup>	200,202,204,205,207,208,210,212 215,218,224,235,238,259,281,282	\$0.002324	I
Municipal Service	544,548	\$0.001330	R
Municipal Pumping	541,543,550	\$0.000124	R
Lighting and Power	60,63,66,223,225,240,242,243,245, 246,249,251,252,254,276,277,291 292,323	\$0.001029	I
Cotton Gin	253	(\$0.000276)	R
Metal Melting < 69 kV	312,315,324,325,335	\$0.007107	I
Oil Field Large Industrial Power	330,331	\$0.000326	R
Large Lighting and Power < 69 kV	346,351	\$0.003805	I
Lighting	90-153,203,510,521,528,529,532, 534,535,538	\$0.000000	

<sup>1</sup> Standby, Supplementary, Backup, Maintenance and As-Available Power Service are included with the Rate Schedule under which the customer takes service.

<sup>2</sup> Rate codes may be added or discontinued during the year. Any new rate code will be billed the EECRF rate based on the customer's applicable Rate Schedule.

<sup>3</sup> General Service includes Recreational Lighting.

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<b>ELECTRIC POWER COMPANY TO</b>	<b>§</b>	<b>PUBLIC UTILITY COMMISSION</b>
<b>ADJUST ENERGY EFFICIENCY</b>	<b>§</b>	<b>OF TEXAS</b>
<b>COST RECOVERY FACTOR AND</b>		
<b>RELATED RELIEF</b>		

**PROTECTIVE ORDER**

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

It is ORDERED that:

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

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

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

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

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

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

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

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

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

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

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

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

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

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



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

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

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

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

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

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

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

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

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

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

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

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

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

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

28. **Maintenance of Protected Status during Periods Specified for Challenging Various**

**Orders**. Any party electing to challenge, in the courts of this state, a Commission or presiding officer determination allowing disclosure or a change in designation shall have a period of ten (10) days from: (a) the date of an unfavorable Commission order; or (b) if the Commission does not rule on an appeal of an interim order, the date an appeal of an interim order to the Commission is overruled by operation of law, to obtain a favorable ruling in state district court. Any party challenging a state district court determination allowing disclosure or a change in designation shall have an additional period of ten (10) days from the date of the order to obtain a favorable ruling from a state appeals court. Finally, any party challenging a determination of a state appeals court allowing disclosure or a change in designation shall have an additional period of ten (10) days from the date of the order to obtain a favorable ruling from the state supreme court, or other appellate court. All Protected Materials shall be afforded the confidential treatment and status provided for in this Protective Order during the periods for challenging the various orders referenced in this paragraph. For purposes of this paragraph, a favorable ruling of a state district court, state appeals court, Supreme Court or other appellate court includes any order extending the deadlines in this paragraph.

29. **Other Grounds for Objection to Use of Protected Materials Remain Applicable.**

Nothing in this Protective Order shall be construed as precluding any party from objecting to the use of Protected Materials on grounds other than confidentiality, including the lack of required relevance. Nothing in this Protective Order constitutes a waiver of the right to argue for more disclosure, provided, however, that unless the Commission or a court orders such additional disclosure, all parties will abide by the restrictions imposed by the Protective Order.

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



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

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

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

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

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

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

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

## ATTACHMENT A

### Protective Order Certification

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

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Signature

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Party Represented

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Printed Name

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Date

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

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Signature

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Party Represented

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Printed Name

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Date

## ATTACHMENT B

I request to view/copy the following documents:

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

\_\_\_\_\_  
 Signature

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

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

\_\_\_\_\_  
 Date

PUC DOCKET NO. 58014  
PUBLIC UTILITY COMMISSION OF TEXAS  
  
APPLICATION OF  
SOUTHWESTERN ELECTRIC POWER COMPANY  
  
TO ADJUST  
ENERGY EFFICIENCY COST RECOVERY FACTOR AND RELATED RELIEF

DIRECT TESTIMONY OF  
ROBERT W. PADDY  
  
FOR  
SOUTHWESTERN ELECTRIC POWER COMPANY

May 1, 2025

## TESTIMONY INDEX

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## EXHIBITS

RWP-1	2024 EECRF Rate Case Expenses
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1 I. INTRODUCTION

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

3 A. My name is Robert W. Paddy. I am an Energy Efficiency and Consumer Programs  
4 Compliance Coordinator for Southwestern Electric Power Company (SWEPCO or the  
5 Company). My business address is 428 Travis Street, Shreveport, Louisiana 71101.

6 Q. PLEASE STATE YOUR EDUCATIONAL AND PROFESSIONAL BACKGROUND.

7 A. I received a Bachelor's degree from Louisiana State University - Shreveport in 1999.  
8 I received a Master's degree from the American Public University in 2012. I began my  
9 employment with SWEPCO in May 2005 and worked in a variety of positions in  
10 Shared Services Corps, Environmental Affairs, and Generation from that time until  
11 February 2025 when I accepted my position as an Energy Efficiency and Consumer  
12 Programs Compliance Coordinator for SWEPCO's demand-side management (DSM)  
13 programs. In this position, I am responsible for verifying the compliance of our  
14 programs with SWEPCO's goals and the regulatory rules of each of the state's public  
15 utility commission within our service territories, including the Public Utility  
16 Commission of Texas.

17 Q. DO YOU SPONSOR ANY OF THE SCHEDULES THAT ACCOMPANY  
18 SWEPCO'S FILING?

19 A. Yes, I sponsor Schedules D and K. In addition, I co-sponsor Schedules J and P with  
20 SWEPCO witness, Montana Fichtel. I co-sponsor Schedule C with SWEPCO witness,  
21 Jonathan Griffin. I co-sponsor Schedules A & B, with SWEPCO witnesses, Fichtel  
22 and Griffin.



1           II.    PURPOSE OF TESTIMONY AND SUMMARY OF SWEPCO'S FILING

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

3    A.    The purpose of my testimony is to:

- 4           •    provide a summary of the relief sought by SWEPCO in this proceeding and of  
5               its filing;
- 6           •    outline the policy considerations for recovery of SWEPCO's projected costs for  
7               its 2026 energy efficiency programs in its adjusted EECRF for 2026, as  
8               contemplated by Public Utility Regulatory Act (PURA) § 39.905 and 16 Tex.  
9               Admin. Code § 25.182 (TAC);
- 10          •    provide information regarding the under-recovery of SWEPCO's energy  
11               efficiency revenues for its 2024 costs to be included in its adjusted EECRF in  
12               2026;
- 13          •    provide information regarding SWEPCO's performance bonus achieved by its  
14               2024 energy efficiency results, as contemplated by 16 TAC § 25.182(e), and to  
15               be recovered through its adjusted EECRF in 2026;
- 16          •    provide information regarding SWEPCO's projected Evaluation,  
17               Measurement, and Verification (EM&V) costs as contemplated by 16 TAC  
18               § 25.181(o) and to be recovered through its adjusted EECRF in 2026; and
- 19          •    provide information regarding recovery of 2024 EECRF proceeding expenses  
20               incurred in Docket No. 56552 to be recovered through its adjusted EECRF in  
21               2026; and
- 22          •    present SWEPCO's request for approval of a good cause exception to establish  
23               revised energy efficiency cost caps as provided by 16 TAC § 25.181(e)(2).

24   Q.   PLEASE DESCRIBE SWEPCO'S FILING.

25   A.    SWEPCO's filing consists of my direct testimony and the direct testimony of SWEPCO  
26    witnesses, Fichtel and Griffin. SWEPCO witness Fichtel's direct testimony addresses:

- 27           •    the energy efficiency costs that SWEPCO incurred for its 2024 programs;
- 28           •    the energy efficiency results achieved in 2024 through these programs;
- 29           •    SWEPCO's energy efficiency goals for 2026 as established by the  
30               Commission's rule;
- 31           •    the energy efficiency programs that SWEPCO will offer in 2026 to meet the  
32               objectives;

- the costs SWEPCO projects to incur in 2026 in connection with the energy efficiency programs and objectives;
- the impact of the industrial identification notices provided for in 16 TAC § 25.181(u); and
- SWEPCO's projected share of the statewide EM&V costs for evaluation of Program Year (PY) 2024 to be collected through the 2026 EECRF.

SWEPCO witness Griffin's direct testimony addresses:

- the design of the adjusted EECRF;
- the cost assignments among the EECRF rate classes to be recovered through the adjusted EECRF; and
- the billing determinants used to develop the EECRF.

Accompanying the direct testimony of SWEPCO's witnesses are Schedules A through R, which provide information the Commission has specified should be provided in support of a request for an adjusted EECRF. Information demonstrating the reasonableness of costs incurred in 2024 is included in the schedules supporting this filing. SWEPCO has also included Schedule S, SWEPCO's 2025 amended Energy Efficiency Plan and Report (EEPR) as filed in Project No. 57468.

**Q. WHAT RELIEF DOES SWEPCO SEEK IN THIS PROCEEDING?**

**A.** 16 TAC § 25.182(d)(8) requires a utility in an area in which customer choice is not offered: (1) to apply, no later than May 1 of each year, to adjust its EECRF in order to reflect changes in costs, performance bonus, and the utility's share of EM&V costs; and (2) to minimize any over- or under-collection in prior years' program costs. With this application, SWEPCO requests that the Commission approve an adjustment to SWEPCO's EECRF to recover \$8,617,755 in 2026. As my testimony and the testimonies of SWEPCO witnesses Fichtel and Griffin explain, the amount SWEPCO

now seeks to recover through its adjusted 2025 EECRF reflects the following components:

- 1) recovery of \$4,842,484 in energy efficiency program costs projected to be incurred in 2026;
- 2) an adjustment in the amount of \$104,743 representing SWEPCO's under-recovery of its actual energy efficiency costs in 2024, which includes \$9,891 in interest;
- 3) recovery of \$3,605,072 representing SWEPCO's performance bonus for achieving demand and energy reductions that exceeded its minimum goals for 2024;
- 4) recovery of \$38,976, SWEPCO's projected share of the statewide EM&V costs for evaluation of PY 2025; and
- 5) recovery of \$26,480, SWEPCO's 2024 EECRF proceeding expenses incurred in Docket No. 56552.

Q. WHAT IS SWEPCO'S PROJECTED 2026 ENERGY EFFICIENCY PROGRAM BUDGET?

A. As shown in Schedule A, SWEPCO's projected total 2026 energy efficiency budget to achieve its energy efficiency objectives for 2026 pursuant to 16 TAC § 25.181(e)(1) is \$4,881,460. The underlying energy efficiency program costs are shown in more detail on Schedule A.

Q. DOES SWEPCO'S 2026 EECRF INCLUDE SWEPCO'S PROJECTED SHARE OF THE STATEWIDE EM&V COSTS?

A. Yes. SWEPCO includes those projected EM&V costs in the amount of \$38,976 for evaluating PY 2025.

1 Q. DID SWEPCO SPEND MORE OR LESS THAN IT BUDGETED ON ITS 2024  
2 ENERGY EFFICIENCY PROGRAMS?

3 A. As shown on Schedule B, SWEPCO incurred a total of \$4,390,012 in energy efficiency  
4 and EM&V costs in 2024, which is \$364,925 less than its projected 2024 budget of  
5 \$4,754,397.

6 Q. DOES SWEPCO HAVE ANY AFFILIATE COSTS FOR ENERGY EFFICIENCY IN  
7 2024?

8 A. No.

9 Q. DID SWEPCO EXCEED ITS GOALS FOR 2024?

10 A. Yes. SWEPCO exceeded its demand reduction goal of 30% of historical average  
11 growth in demand for 2024 and its associated energy goal, and consequently, qualifies  
12 for a performance bonus pursuant to 16 TAC § 25.182(e). Schedule D provides the  
13 detail for the calculation of the \$3,605,072 performance bonus that SWEPCO earned  
14 for exceeding its goal.

15 Q. WHAT DOES SWEPCO REQUEST TO BE THE EFFECTIVE DATE OF THE  
16 ADJUSTED EECRF FOR 2026?

17 A. SWEPCO requests that the adjusted EECRF be made effective as of January 1, 2026.

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

A. In PURA § 39.905, the Texas Legislature established policies that an electric utility such as SWEPCO operating in an area not open to competition:

- The Legislature has also recognized that a utility should have access to a mechanism to enable timely and reasonable recovery of the costs of providing these energy efficiency programs. Specifically, SWEPCO is allowed to recover the increased costs it must incur to meet the goals of PURA § 39.905, as well as additional cost-effective energy efficiency in excess of the minimum goals. The Legislature also recognized that utilities should be provided an incentive to exceed the goals in the statute and directed the Commission to establish rules to award incentives to the utilities for exceeding their annual goals.

1 B. Commission Rule Pertaining to an EECRF Filing

2 Q. WHAT ARE THE MINIMUM ANNUAL ENERGY EFFICIENCY GOALS?

3 A. 16 TAC § 25.181(e)(1) requires a utility to administer a portfolio of energy efficiency  
4 programs to acquire, at a minimum, the following:

5 (A) Beginning with the 2013 program year, until the trigger described in  
6 subparagraph (B) of this paragraph is reached, the utility shall acquire  
7 a 30% reduction of its annual growth in demand of residential and  
8 commercial customers.

9 (B) If the demand reduction goal to be acquired by a utility under  
10 subparagraph (A) of this paragraph is equivalent to at least four-  
11 tenths of one percent of its summer weather-adjusted peak demand  
12 for the combined residential and commercial customers for the  
13 previous program year, the utility shall meet the energy efficiency  
14 goal described in subparagraph (C) of this paragraph for each  
15 subsequent program year.

16 (C) Once the trigger described in subparagraph (B) of this paragraph is  
17 reached, the utility shall acquire four-tenths of one percent of its  
18 summer weather-adjusted peak demand for the combined residential  
19 and commercial customers for the previous program year.

20 (D) Except as adjusted in accordance with subsection (u) of this  
21 subsection, a utility's demand reduction goal in any year shall not be  
22 lower than its goal for the prior year, unless the Commission  
23 establishes a goal for a utility under paragraph (2) of this section.

24 Q. HOW HAS SWEPCO ESTABLISHED ITS ENERGY EFFICIENCY GOAL FOR  
25 2026?

26 A. As determined by 16 TAC § 25.181(e)(1), SWEPCO's calculated goal for 2026 is lower  
27 than the actual goal for 2025, which was 5.6 megawatts (MW). According to 16 TAC  
28 § 25.181(e)(1)(D), SWEPCO's goal cannot be lower than 5.6 MW. Therefore,  
29 SWEPCO's goal for 2026 is 5.6 MW.

1 Q. WHY IS SWEPCO FILING THIS REQUEST TO ADJUST ITS EECRF FOR  
2 RECOVERY OF ITS ENERGY EFFICIENCY EXPENDITURES?

3 A. The Commission's rule includes provisions for a utility such as SWEPCO to request  
4 that an EECRF be adjusted to recover all its forecasted annual energy efficiency  
5 program costs (16 TAC § 25.182(d)(1)). Also, as I stated earlier, 16 TAC  
6 § 25.182(d)(8) requires a utility without customer choice to file, no later than May 1st  
7 of each year, to adjust its EECRF to reflect changes in program costs and achieved  
8 performance bonus, and to minimize any over- or under-collection in prior year  
9 program costs.

10 Q. DO THE COMMISSION'S RULES ALLOW RECOVERY OF EECRF  
11 PROCEEDING EXPENSES?

12 A. Yes. Pursuant to 16 TAC § 25.182(d)(3), EECRF applications are ratemaking  
13 proceedings. In such matters, the rule also allows proceeding expenses to be recovered  
14 through the EECRF, which include legal and consulting expenses incurred from the  
15 utility's immediate previous year's EECRF proceeding. SWEPCO's requested  
16 recovery of its 2024 EECRF proceeding expenses are addressed in Section IV.F below.

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

19 A. As outlined in the Commission's rules for energy efficiency, an EECRF rate schedule  
20 must be included in the utility's tariff to permit the utility timely recovery of the  
21 reasonable costs of providing energy efficiency programs, including the prior year's  
22 over- or under-collection of energy efficiency costs, and any applicable performance  
23 bonus (16 TAC § 25.182(e)). The Commission may approve an energy rate for

1 residential customers and commercial rate classes whose base rates do not provide for  
2 demand charges (16 TAC § 25.182(d)(6)). For PY 2026, the EECRF rates should not  
3 exceed the cost caps based on the percentage change in the South urban consumer price  
4 index (16 TAC § 25.182(d)(7)(C)). The EECRF must be set at a rate that will give  
5 SWEPCO the opportunity to earn revenues equal to the sum of SWEPCO's forecasted  
6 energy efficiency costs, applicable prior year over- or under-collection, applicable  
7 performance bonus, and projected EM&V costs.

8 According to the Commission's rule regarding a proceeding to change an  
9 EECRF, a utility must show that the costs to be recovered through the EECRF are  
10 reasonable estimates of the costs necessary to provide energy efficiency programs and  
11 to meet the utility's goals (16 TAC § 25.182(d)(12)). Furthermore, the utility must  
12 include information in its EECRF application regarding the direct assignment and  
13 allocation of costs to rate classes (16 TAC § 25.182(d)(10)(F)) as well as the calculation  
14 of billing determinants for the year in which the EECRF is to be in effect (16 TAC  
15 § 25.182(d)(10)(E)).

16

17 **IV. SWEPCO'S APPLICATION**

18 **Q. WHAT ARE THE ESSENTIAL ELEMENTS CONTAINED WITHIN SWEPCO'S**  
19 **APPLICATION REQUESTING EECRF RECOVERY OF ENERGY EFFICIENCY**  
20 **PROGRAM COSTS?**

21 **A.** According to 16 TAC § 25.182(d)(3), a utility's application to change an EECRF is a  
22 ratemaking proceeding and must include witness testimony and schedules by rate class  
23 in compliance with 16 TAC § 25.182(d)(10). The testimony and schedules that



1 SWEPCO has included in this filing are comparable to the testimony and schedules  
2 submitted in previous SWEPCO EECRF cases—Docket Nos. 35625, 36961, 38210,  
3 39359, 40357, 41439, 42447, 44612, 45824, 47116, 48334, 49499, 50805, 52073,  
4 53542, 54948 and 56552. SWEPCO's testimony and schedules satisfy 16 TAC  
5 § 25.182(d)(10)'s requirements and provide additional information as applicable in  
6 compliance with 16 TAC § 25.182(d)(11).

7 SWEPCO's application includes testimony and schedules showing:

- 8 1. SWEPCO's forecasted energy efficiency program costs for 2026;
- 9 2. the energy efficiency performance bonus SWEPCO earned for PY  
10 2024 energy efficiency achievements;
- 11 3. the amount of SWEPCO's 2024 actual energy efficiency costs;
- 12 4. information concerning the calculation of billing determinants for  
13 2024 and 2026;
- 14 5. the direct assignment and allocation of energy efficiency costs to the  
15 utility's eligible rate classes;
- 16 6. SWEPCO's administrative costs;
- 17 7. the incentive payments by program, including a list of each service  
18 provider receiving more than five percent of the overall incentive  
19 payments and the percentage received;
- 20 8. projected budgets for costs for the year in which the adjusted EECRF  
21 is expected to be in effect (2026), including costs for the dissemination  
22 of information, outreach and other major administrative costs;
- 23 9. the basis of the projection of costs for 2026 and discussions on the  
24 cost cap calculations;
- 25 10. the actual EECRF revenues, by rate class, for the period of under-  
26 recovery of 2024 EECRF costs;
- 27 11. SWEPCO's bidding and engagement process for contracting with  
28 EESPs and a list of all EESPs that received EECRF payments during  
29 2024;
- 30 12. the estimated useful life used for each measure; and
- 31 13. the estimated EM&V costs for evaluation of PY 2025.

1 All the above elements of SWEPCO's application for approval of its 2026 EECRF are  
2 required by 16 TAC § 25.182(d)(10).

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

5 Q. WHAT DEMAND AND ENERGY SAVINGS DOES SWEPCO PROPOSE TO  
6 ACHIEVE THROUGH ITS 2026 PROGRAMS?

7 A. The energy efficiency objectives SWEPCO seeks to achieve through the proposed 2026  
8 energy efficiency expenditures include a peak demand reduction of as much as 16.36  
9 MW and as much as 20,479 megawatt-hours (MWh) in energy savings.

10 SWEPCO's calculated residential and commercial customer demand reduction  
11 goal for 2026 is 4.81 MW pursuant to 16 TAC § 25.181(e)(1). However, SWEPCO  
12 will use a minimum goal of 5.6 MW pursuant to 16 TAC § 25.181(e)(1)(D), which  
13 states, "a utility's demand reduction goal in any year shall not be lower than its goal  
14 for the prior year." SWEPCO's 2026 energy savings goal is 9,811 MWh calculated in  
15 accordance with 16 TAC § 25.181(e)(4).

16 Q. DO YOU BELIEVE IT IS CONSISTENT WITH THE COMMISSION'S RULE TO  
17 PURSUE THE OBJECTIVES SWEPCO HAS ESTABLISHED FOR ITS 2026  
18 PROGRAM?

19 A. Yes. I believe the intent of the Commission's rule is for SWEPCO to achieve as much  
20 cost-effective energy efficiency savings as is reasonably possible. This intent is  
21 manifested in PURA § 39.905(b)(2), wherein the Legislature authorized the  
22 Commission to provide an incentive to reward a utility "administering programs under  
23 this section that exceed the minimum goals established by this section." The express

characterization of the goals in PURA § 39.905 as “minimum goals” clearly indicates the Legislature’s desire that utilities exceed these goals where additional cost-effective energy efficiency savings are reasonably possible.

### B. Industrial Notice Customers

Q. PLEASE EXPLAIN HOW THE COMMISSION DEFINES AN INDUSTRIAL CUSTOMER PURSUANT TO ITS RULE.

A. 16 TAC § 25.181(c)(30) and (u) provide that an industrial customer is a for-profit entity engaged in an industrial process taking electric service at transmission voltage, or a for profit entity engaged in an industrial process taking electric service at distribution voltage that qualifies for a tax exemption under Tax Code § 151.317 and has submitted an identification notice pursuant to 16 TAC § 25.181(u).

Q. ARE THESE INDUSTRIAL CUSTOMERS EXEMPT FROM PAYING CHARGES IN THE ADJUSTED EECRF FOR 2025?

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

Q. HAVE ANY OF SWEPSCO'S INDUSTRIAL CUSTOMERS SUBMITTED IDENTIFICATION NOTICES?

A. Yes. The direct testimony of witness Fichtel provides further discussion regarding industrial customer identification notices and the effect of the removal of industrial load to SWEPCO's demand reduction goal. Please also see the direct testimony of

1 witness Griffin for discussion regarding the effect of these notifications to the  
2 determination of the EECRF.

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

4 Q. DO SWEPCO'S 2024 ENERGY EFFICIENCY PROGRAM COSTS INCLUDE R&D  
5 EXPENDITURES?

6 A. Yes. The 2024 energy efficiency program and EM&V costs of \$4,390,012 shown on  
7 Schedule B include \$123,682 in costs for R&D funded by SWEPCO. This includes  
8 activities to support existing program refinement and costs related to developing  
9 upgrades and enhancements to SWEPCO's electronic energy efficiency program  
10 tracking and reporting database. All of these R&D expenditures incurred in 2024 were  
11 for the purpose of fostering continuous improvement and innovation in the application  
12 of energy efficiency technology and energy efficiency program design and  
13 implementation. Please also see witness Fichtel's direct testimony for further  
14 discussion of SWEPCO's R&D expenditures in 2024.

15 Q. DOES SWEPCO'S PROJECTED 2026 ENERGY EFFICIENCY PROGRAM  
16 BUDGET INCLUDE R&D EXPENDITURES?

17 A. Yes. SWEPCO has budgeted \$125,000 to conduct R&D activities in 2026.

18 Q. HAS SWEPCO BUDGETED THE MAXIMUM AMOUNT FOR ENERGY  
19 EFFICIENCY R&D EXPENDITURES ALLOWED BY THE COMMISSION'S  
20 RULE?

21 A. No, it has not. 16 TAC § 25.181(g) specifies that the maximum amount of energy  
22 efficiency R&D costs that SWEPCO can incur is 10% of its total program costs for that  
23 program year for 2026. With this, SWEPCO's maximum R&D budget would be

1       \$471,784; however, SWEPCO has budgeted \$125,000, the amount it considers to be  
2       reasonable for projected R&D expenditures, considering the whole of its energy  
3       efficiency program offerings and the magnitude of its required demand reduction  
4       target to be achieved in 2026.

5                                   D. Under-Recovery of 2024 Costs

6    Q.    IS SWEPCO SEEKING TO RECOVER FROM CUSTOMERS THE AMOUNT OF  
7       UNDER-RECOVERED ENERGY EFFICIENCY REVENUES BASED ON  
8       REVENUES COLLECTED THROUGH ITS 2024 EECRF WHICH WERE LESS  
9       THAN ENERGY EFFICIENCY COSTS ACTUALLY INCURRED IN 2024?

10   A.   Yes. In addition to recovery of its projected total 2026 expenditures, SWEPCO is  
11       requesting to include within its adjusted 2026 EECRF the under-recovered amount of  
12       its actual 2024 EECRF expenditures that exceeded the amount of its energy efficiency  
13       revenues collected in 2024, including interest.

14   Q.   PLEASE EXPLAIN THE BASIS FOR SWEPCO'S INCLUSION OF THE 2024  
15       UNDER - RECOVERY AMOUNT IN ITS ADJUSTED 2026 EECRF.

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

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

23       Additionally, 16 TAC § 25.182(d)(1)(A) states that the EECRF shall be calculated to  
24       recover the preceding year's over- or under-recovery.

SWEPCO incurred total energy efficiency program and EM&V costs of \$4,390,012 in good faith in 2024 to pursue the goals set forth in the Commission's rule. SWEPCO collected \$4,475,980 in energy efficiency revenue through its 2024 EECRF, representing an under-recovery of \$104,743, including \$9,891 in interest. SWEPCO requests an adjustment to its 2026 EECRF for this under-recovered 2024 energy efficiency program cost amount as shown on Schedule C.

### E. 2024 Performance Bonus

Q. HAS SWEPCO CALCULATED THE PERFORMANCE BONUS IT SEEKS IN CONNECTION WITH ITS 2024 ENERGY EFFICIENCY PROGRAM ACHIEVEMENTS?

A. Yes. Please refer to Schedule D, which details the calculation of the performance bonus SWEPCO seeks to be awarded based upon its 2024 program year energy efficiency achievements.

SWEPCO achieved a demand reduction of 10.82 MW and an energy reduction of 19,985 MWh from its 2024 portfolio of energy efficiency programs. SWEPCO's minimum demand reduction goal to be achieved in 2024 was 5.6 MW and the energy reduction goal to be achieved in 2024 was 9,811 MWh. SWEPCO exceeded both its 2024 demand reduction goal and its energy reduction goal, qualifying SWEPCO for a performance bonus. All of the calculations and requirements regarding the \$3,605,072 performance bonus comply with 16 TAC § 25.182(e).

1 F. 2024 Energy Efficiency Proceeding Expenses

2 Q. WHAT EXPENSES FROM SWEPCO'S 2024 EECRF DOCKET NO. 56552  
3 PROCEEDING DOES THE COMPANY SEEK TO RECOVER THROUGH ITS  
4 APPLICATION IN THIS PROCEEDING?

5 A. Consistent with the Commission's rule, SWEPCO has included in this filing a request  
6 for its 2024 EECRF rate-case expenses incurred in Docket No. 56552 which totaled  
7 \$26,480 and were attributable to outside legal expense. The invoices relating to the  
8 Company's 2024 EECRF rate-case expenses in Docket No. 56552 are included with  
9 the affidavit of George G. Hoyt attesting to the reasonableness of those costs as Exhibit  
10 RWP-1. A description of how the 2024 EECRF rate-case expenses are incorporated  
11 into the 2026 Rider EECRF rates can be found in witness Griffin's testimony.

12 G. Customer Cost Caps & Request for Good Cause Exception

13 Q. DO THE COMMISSION'S RULES PROVIDE FOR A LIMITATION ON THE  
14 EXPENDITURES A UTILITY MAY RECOVER FOR ENERGY EFFICIENCY  
15 PROGRAMS?

16 A. Yes. 16 TAC § 25.182(d)(7) sets cost caps on the amount that can be charged to a  
17 customer for recovery of costs related to energy efficiency on a per kWh basis. 16  
18 TAC § 25.182(d)(7)(C) states:

19 "[f]or the 2019 program year and thereafter, the residential and  
20 commercial cost caps shall be calculated to be the prior period's cost  
21 caps increased or decreased by a rate equal to the most recently available  
22 calendar year's percentage change in the South urban CPI, as  
23 determined by the Federal Bureau of Labor Statistics."

24 Q. WHAT ARE THE COST CAP RATES APPLICABLE TO SWEPCO FOR ITS 2026  
25 PROGRAM COSTS?

1 A. As noted above, the residential and commercial cost caps are adjusted based on the  
2 most recently available calendar year's percentage change in the South urban CPI. As  
3 discussed by witness Griffin the 2026 residential cap is \$0.001674 and the cap for the  
4 commercial classes is \$0.001047.

5 Q. HOW DO SWEPCO'S 2026 EECRF COSTS THAT ARE SUBJECT TO THE COST  
6 CAPS FOR THE RESIDENTIAL AND COMMERCIAL CUSTOMER CLASSES  
7 COMPARE TO THE REGULATORY COST CAPS?

8 A. As explained by witness Griffin and shown on Schedule G, SWEPCO's 2026 EECRF  
9 costs that are subject to the cost cap did exceed the approved commercial cost cap of  
10 \$0.001047 per kWh. SWEPCO's 2026 EECRF costs that are subject to the cost cap  
11 for the commercial cost cap would result in an EECRF charge of \$0.001230 per kWh.  
12 Also, SWEPCO's 2026 EECRF costs that are subject to the cost cap did exceed the  
13 approved residential cost cap of \$0.001674 per kWh. SWEPCO's 2026 EECRF costs  
14 that are subject to the residential cost cap would result in an EECRF charge of  
15 \$0.002331 per kWh.

16 Q. WHAT IS THE COMMISSION RULE REGARDING REVISING THE ENERGY  
17 EFFICIENCY COST CAP?

18 A. 16 TAC § 25.181(e)(2) states in part:

19 "The commission may establish for a utility ... an EECRF greater than  
20 the cap specified in § 25.182(d)(7) of this title if the utility demonstrates  
21 that compliance with that ... EECRF cost cap is not reasonably possible  
22 and that good cause supports the ... higher EECRF cost cap. To be  
23 eligible for a ... higher EECRF cost cap, the utility must request a good  
24 cause exception as part of its EECRF application under § 25.182 of this  
25 title. If approved, the good cause exception is limited to the program  
26 year associated with the EECRF application."



1 Q. IS SWEPCO REQUESTING THAT THE COMMISSION REVISE THE COST CAP  
2 FOR COMMERCIAL CUSTOMER CLASS?

3 A. Yes. Because it is not reasonably possible for SWEPCO to comply with the  
4 commercial cost cap while maintaining its current level of energy efficiency programs  
5 and customer benefits, SWEPCO requests that the Commission establish a revised cost  
6 cap equal to SWEPCO's 2026 EECRF charges subject to the cost cap (\$0.001230 per  
7 kWh) for the commercial customer class. To provide the most benefit to customers,  
8 SWEPCO seeks to continue offering its programs at its proposed budget levels which  
9 are consistent with those the Commission has previously found to be reasonable and  
10 cost effective. Maintaining energy-efficiency program funding at the proposed levels  
11 enables SWEPCO to continue offering the same valuable energy-saving programs,  
12 along with the same level of achievements and customer benefits.

13 Q. IS THERE GOOD CAUSE FOR THE COMMISSION TO ESTABLISH A REVISED  
14 COMMERCIAL COST CAP FOR SWEPCO?

15 A. Yes. The Commission has recognized that maximizing cost-effective energy efficiency  
16 savings is beneficial to customers. Moreover, utilities are encouraged to exceed the  
17 minimum goals outlined in the rule. Good cause exists to establish a revised  
18 commercial cost cap to enable SWEPCO to continue offering the same energy-  
19 efficiency programs and level of customer benefits, rather than changing the level of  
20 programs offered or benefits provided to reduce costs to commercial customers.  
21 SWEPCO can best serve customers by continuing with its proposed programs as  
22 budgeted. This would allow SWEPCO to meet its 2026 goal in a cost-effective manner

1 possible while still providing valuable energy-efficiency program options and net  
2 benefits to customers.

3 Q. IS SWEPCO REQUESTING THAT THE COMMISSION REVISE THE COST CAP  
4 FOR THE RESIDENTIAL CUSTOMER CLASS?

5 A. Yes. Because it is not reasonably possible for SWEPCO to comply with the residential  
6 cost cap while maintaining its current level of energy efficiency programs and customer  
7 benefits, SWEPCO requests that the Commission establish a revised cost cap equal to  
8 SWEPCO's 2026 EECRF charges subject to the cost cap (\$0.002331 per kWh) for the  
9 residential customer class. To provide the most benefit to customers, SWEPCO seeks  
10 to continue offering its programs at its proposed budget levels which are consistent  
11 with those the Commission has previously found to be reasonable and cost effective.  
12 Maintaining energy-efficiency program funding at the proposed levels enables  
13 SWEPCO to continue offering the same valuable energy-saving programs, along with  
14 the same level of achievements and customer benefits.

15 Q. IS THERE GOOD CAUSE FOR THE COMMISSION TO ESTABLISH A REVISED  
16 RESIDENTIAL COST CAP FOR SWEPCO?

17 A. Yes. The Commission has recognized that maximizing cost-effective energy efficiency  
18 savings is beneficial to customers. Moreover, utilities are encouraged to exceed the  
19 minimum goals outlined in the rule. Good cause exists to establish a revised residential  
20 cost cap to enable SWEPCO to continue offering the same energy-efficiency programs  
21 and level of customer benefits, rather than changing the level of programs offered or  
22 benefits provided to reduce costs to residential customers. SWEPCO can best serve  
23 customers by continuing with its proposed programs as budgeted. This would allow



- 1 A. Yes, SWEPCO's application meets all the requirements for approval of the requested  
2 adjustment to its 2026 EECRF to recover the components described in my direct  
3 testimony and supported by SWEPCO's other witnesses.
- 4 Q. DOES THIS CONCLUDE YOUR DIRECT TESTIMONY?
- 5 A. Yes, it does.

**PUC DOCKET NO. 58014**

<b>APPLICATION OF SOUTHWESTERN</b>	<b>§</b>	
<b>ELECTRIC POWER COMPANY TO</b>	<b>§</b>	<b>PUBLIC UTILITY COMMISSION</b>
<b>ADJUST ITS ENERGY EFFICIENCY</b>	<b>§</b>	
<b>COST RECOVERY FACTOR AND</b>	<b>§</b>	<b>OF TEXAS</b>
<b>RELATED RELIEF</b>		

**AFFIDAVIT OF GEORGE G. HOYT**

STATE OF TEXAS	§
	§
COUNTY OF TRAVIS	§

BEFORE ME, the undersigned authority, on this day personally appeared George G. Hoyt, who being by me first duly sworn, on oath, depose and said the following:

My name is George G. Hoyt. I am over the age of twenty-one years, am of sound mind, have personal knowledge of the statements made herein, and the facts are true and correct. I am competent to make this Affidavit.

1. I am employed by American Electric Power Service Corporation (AEPSC) as Associate General Counsel. I have practiced law since 2006, including many cases before the Public Utility Commission of Texas (Commission).
2. I am employed by AEPSC as an attorney in its Legal Department. I have represented American Electric Power's subsidiary operating companies, including Southwestern Electric Power Company (SWEPCO), as well as other investor-owned utilities in Texas, on a number of matters. Such matters include energy efficiency cost recovery factor (EECRF) proceedings, base-rate cases, fuel-reconciliation proceedings, sale/transfer/merger dockets, and various tariff-related matters.
3. As Associate General Counsel, I am responsible for reviewing invoices from outside law firms and consultants.
4. As Associate General Counsel for AEPSC, which is responsible for providing legal services to all American Electric Power Company, Inc. business units, I am familiar with the rates of a broad range of lawyers, both those at small and large firms and solo practitioners, including the rates charged by such attorneys for work on matters before the Commission.
5. In the 2024 *Application of Southwestern Electric Power Company to Adjust Its Energy Efficiency Cost Recovery Factors and Related Relief*, Docket No. 56552, SWEPCO was represented by outside counsel with the law firm of Duggins Wren Mann & Romero, LLP

(DWMR). The DWMR attorneys who worked on this matter have extensive experience representing utilities before the Commission, including EECRF proceedings.

6. Patrick Pearsall was the primary attorney at DWMR representing SWEPCO in its 2024 EECRF filing in Docket No. 56552. Mr. Pearsall has been a licensed Texas attorney since 2004, representing utility clients before the Commission and Texas courts for the majority of that time, and one of DWMR's outside counsels in various proceedings. Moreover, SWEPCO is not the only client he represents before the Commission. Mr. Pearsall is therefore knowledgeable of and skilled in Commission practices and procedures. SWEPCO was also represented by another attorney at DWMR who assisted Mr. Pearsall representing SWEPCO in a cost-effective manner.
7. The invoices to SWEPCO from DWMR for work in Docket No. 56552, which total \$26,480.35 are attached. The billings provide detail of what task was being addressed for the time billed, and therefore, indicate the time billed for any specific issue or issues in last year's proceeding, which would also indicate the amount of rate-case expenses reasonably associated with each issue. I have personally reviewed the invoices on behalf of SWEPCO.
8. I reviewed the above-referenced invoices taking into consideration the eight factors listed in Rule 1.04(b) of the Texas Disciplinary Rules of Professional Conduct:
  - 1) the time and labor required, novelty and difficulty of the questions involved and the skill requisite to perform the legal services properly;
  - 2) the likelihood that acceptance of employment will preclude other employment by the attorney;
  - 3) the fee customarily charged in the locality for similar legal services;
  - 4) the amount of time involved and result achieved;
  - 5) time limitation imposed by the client or by the circumstances;
  - 6) the nature and length of the professional relationship with the client;
  - 7) the experience, reputation and ability of the lawyers performing the services; and
  - 8) whether the fee is fixed or contingent on results or uncertainty of collection before the legal services have been rendered.
9. I considered the factors delineated by the Third Court of Appeals in *City of El Paso v. Public Utility Comm'n of Texas*, 916 S.W.2d 515 (Tex. App.—Austin 1995, writ dismissed by agr.):
  - 1) Time and labor required;
  - 2) nature and complexity of the case;
  - 3) amount of money or value of property or interest at stake;
  - 4) extent of responsibilities the attorney assumes;
  - 5) whether the attorney loses other employment because of the undertaking; and

6) benefits to the client from the services.

10. I also considered the relevant criteria relating to the reasonableness of rate-case expenses in 16 Tex. Admin. Code (TAC) § 25.245(b):

- 1) the nature, extent, and difficulty of the work done by the attorney or other professional in the rate case;
- 2) the time and labor required and expended by the attorney or other professional;
- 3) the fees or other consideration paid to the attorney or other professional for the services rendered;
- 4) the expenses incurred for lodging, meals and beverages, transportation, or other services or materials;
- 5) the nature and scope of the rate case, including:
  - A. the size of the utility and number and type of consumers served;
  - B. the amount of money or value of property or interest at stake;
  - C. the novelty or complexity of the issues addressed;
  - D. the amount and complexity of discovery;
  - E. the occurrence and length of a hearing; and
- 6) the specific issue or issues in the rate case and the amount of rate-case expenses reasonably associated with each issue.

11. As noted above, I am familiar with the rates for utility regulatory work in Texas and elsewhere. Generally speaking, the rates charged by an individual lawyer typically vary based on the level of experience possessed by the lawyer performing the work, the size and resources of the law firm in which the lawyer works, and the technical nature of the work performed. While the hourly rate charged by outside counsel for work in this case is an important factor, it is only one of many important factors to be considered. Equally important are factors such as the number of hours worked, the complexity of the issues involved, and the experience of the lawyers involved. That is, an experienced lawyer in a complex case with an hourly rate at the high end of the range may be more able to more efficiently do the work than a less experienced lawyer with an hourly rate at the low- or mid-point of the hourly rate range, such that the total amount paid at the end of the day is reasonable, even if the hourly rates are at the high end of the range. Similarly, a lawyer working at an hourly rate at the low- or mid-point range may have spent so many hours on a matter that the total amount paid is not reasonable, even though the rate is low.

12. I am familiar with many regulatory lawyers in the Texas bar, and the lawyers at DWMR enjoy excellent reputations for providing a high level of quality work on both complex and routine matters. DWMR works on matters of significant importance to its utility clients. In my experience, the hourly rates of DWMR for work done in Docket No. 56552 are

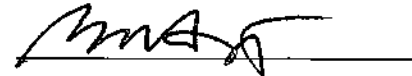
consistent with other Texas lawyers performing similar work in Texas. Rates for lawyers at the Commission, in my experience, have recently ranged, depending on the experience of the lawyer between \$230 to more than \$700 (and sometimes more for very specialized subject matters, like regulatory tax work). The rates for DWMR work in Docket No. 56552 are in the expected range.

13. The rates charged by DWMR for Docket No. 56552 were the same hourly rates the law firm charged for SWEPCO and its affiliates for other matters of which I am familiar, including matters for which rate-case expense reimbursement was not available.
14. In my opinion, the hourly rates charged by DWMR in Docket No. 56552 are reasonable and in the range of rates charged in Texas by firms with the same level of depth and expertise. Similarly, in my opinion, the other expenses charged by DWMR (i.e., copying, delivery service, etc.) are also reasonable and in line with costs charged by other law firms providing these types of legal services.
15. With respect to 16 TAC § 25.245(b) and (c) that relate to the determination of the reasonableness and necessity of the rate-case expenses SWEPCO seeks to recover, the following information is relevant:
  - 1) The rate-case expense documentation SWEPCO is filing shows that the fees paid to, tasks performed by, and time spent on a task by an attorney or other professional in these cases is not extreme or excessive;
  - 2) The rate-case expense documentation SWEPCO is filing shows that the expenses incurred for any lodging, meals and beverages, transportation, or other services or materials were not extreme or excessive;
  - 3) SWEPCO's application, testimony, and related material in Docket No. 56552 as well as the rate-case documentation SWEPCO is filing show there was no unnecessary duplication of services or testimony;
  - 4) SWEPCO's application, testimony, and related materials show that SWEPCO's EECRF application has a reasonable basis in law, policy, and fact, and is warranted based on Commission precedent in prior EECRF cases;
  - 5) SWEPCO's rate-case expenses in Docket No. 56552 as a whole are not disproportionate, excessive, or unwarranted in relation to the nature and scope of the case addressed by the evidence pursuant to 16 TAC § 25.245(b) for the reasons noted above; and
  - 6) Given the rate-case expense documentation SWEPCO is filing, SWEPCO did not fail to comply with the requirement for providing sufficient

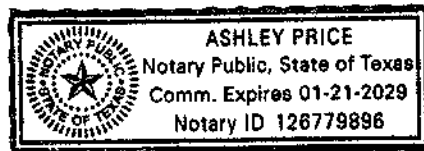


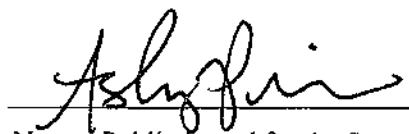
information pursuant to 16 TAC § 25.245(b).

16. Based on my experience and after considering the factors listed in paragraphs 8, 9, 10 above, the \$26,480.35 in rate-case expenses incurred by SWEPCO in Docket No. 56552 were reasonable and necessary for the work performed.

  
George G. Hoyt

SUBSCRIBED AND SWORN TO BEFORE ME, a Notary Public, in and for the  
State  
of Texas, this 29<sup>th</sup> of April 2025.



  
Notary Public in and for the State of  
Texas My Commission Expires: 1-21-2029

**PAID****Invoice#: 41452**

Matter: AEP-2024-4225867/SWEPCO Texas 2024 EECRF - Docket No. 56552

<b>From: Duggins Wren Mann &amp; Romero, LLP</b>	Invoice#	41452	Fees	992.00 USD
Austin TX	PO Number		Fee Adjustments	0.00 USD
United States	Invoice Date	Apr 11, 2024	Expenses	0.00 USD
	Due Date	May 11, 2024	Exp Adjustments	0.00 USD
	Start Date	Mar 01, 2024	Invoice Discounts	0.00 USD
	End Date	Mar 31, 2024	<b>Net Fees &amp; Exp</b>	<b>992.00 USD</b>
<b>To:</b>	Submission Date	Apr 11, 2024	Taxes	0.00 USD
	Government Invoice Number		<b>Invoice Total</b>	<b>992.00 USD</b>
			Paid	992.00 USD

**Fees (7)**

	Date	TK Name	TK ID	Description	Effective Rate	Hours	Total
1	03/13/2024	Green,Stephanie	SMG	Analysis/Strategy Communicate with client L. Melhem and J. Griffin re case plan and strategy for filings /PUCT-Overall Case Strategy. (L120) (A106)	275.00 USD	0.20	55.00 USD
2	03/19/2024	Green,Stephanie	SMG	Analysis/Strategy Review/Analyze draft EEPR and information to be updated /PUCT-Overall Case Strategy. (L120) (A104)	275.00 USD	0.30	82.50 USD
3	03/19/2024	Green,Stephanie	SMG	Analysis/Strategy Communicate with client S. Mutiso et al. re EEPR draft /PUCT-Overall Case Strategy. (L120) (A106)	275.00 USD	0.20	55.00 USD
4	03/26/2024	Pearsall,Patrick	PJP	Pleadings Review/Analyze draft EEPR /PUCT-Non-Discovery Pleadings and Motions. (L210) (A104)	430.00 USD	0.50	215.00 USD
5	03/27/2024	Pearsall,Patrick	PJP	Pleadings Communicate with client S. Mutiso, J. Griffin, and litigation support re review and finalization of EEPR /PUCT-Non-Discovery Pleadings and Motions. (L210) (A106)	430.00 USD	0.40	172.00 USD
6	03/27/2024	Green,Stephanie	SMG	Pleadings Communicate with client S. Mutiso et al. re EEPR draft and updated information /PUCT-Non-Discovery Pleadings and Motions. (L210) (A106)	275.00 USD	0.60	165.00 USD

	Date	TK Name	TK ID	Description	Effective Rate	Hours	Total
7	03/27/2024	Green,Stephanie	SMG	Pleadings Draft/Revise edits to EEPR draft /PUCT-Non-Discovery Pleadings and Motions. (L210) (A103)	275.00 USD	0.90	247.50 USD

Hours Total	3.10
Fees	992.00 USD
Fee Adjustments	0.00 USD
Fee Tax Total	0.00 USD

Invoice Level Discounts (1)

	Date	Type	Code	Description	Total
8	03/31/2024	Fee	TVD01	Tiered Volume Discount (TVD01)	0.00 USD

Fee Discount Total	0.00 USD
Fee Discount Tax Total	0.00 USD

Fees	992.00 USD
Fee Adjustments	0.00 USD
Expenses	0.00 USD
Exp Adjustments	0.00 USD
Invoice Discounts	0.00 USD
<b>Net Fees &amp; Exp</b>	<b>992.00 USD</b>
Taxes	0.00 USD
<b>Invoice Total</b>	<b>992.00 USD</b>
Paid	992.00 USD

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PAID  
Invoice#: 41770

Matter: AEP-2024-4225867/SWEPCO Texas 2024 EECRF - Docket No. 56552

<b>From: Duggins Wren Mann &amp; Romero, LLP</b> Austin TX United States  <b>To:</b>	Invoice#	41770	Fees	8,501.50 USD
	PO Number		Fee Adjustments	0.00 USD
	Invoice Date	May 14, 2024	Expenses	0.00 USD
	Due Date	Jun 14, 2024	Exp Adjustments	0.00 USD
	Start Date	Apr 01, 2024	Invoice Discounts	-425.08 USD
	End Date	Apr 30, 2024	<b>Net Fees &amp; Exp</b>	<b>8,076.42 USD</b>
	Submission Date	May 14, 2024	Taxes	0.00 USD
	Government Invoice Number		<b>Invoice Total</b>	<b>8,076.42 USD</b>
			Paid	8,076.42 USD

Fees (38)

	Date	TK Name	TK ID	Description	Effective Rate	Hours	Total
1	04/05/2024	Green,Stephanie	SMG	Fact Witnesses Review/Analyze first draft of testimony for D. Deibel /PUCT-Overall Case Strategy. (L410) (A104)	275.00 USD	0.40	110.00 USD
2	04/05/2024	Green,Stephanie	SMG	Fact Witnesses Review/Analyze first draft of testimony for K. Abmas /PUCT-Overall Case Strategy. (L410) (A104)	275.00 USD	0.60	165.00 USD
3	04/05/2024	Green,Stephanie	SMG	Pleadings Draft/Revise list of issues for follow up related to EECRF filing /PUCT-Non-Discovery Pleadings and Motions. (L210) (A103)	275.00 USD	0.30	82.50 USD
4	04/05/2024	Green,Stephanie	SMG	Fact Witnesses Review/Analyze first draft of testimony for J. Sims /PUCT-Overall Case Strategy. (L410) (A104)	275.00 USD	0.70	192.50 USD
5	04/10/2024	Green,Stephanie	SMG	Fact Witnesses Communicate with client J. Frederick re post review call follow up /PUCT-Overall Case Strategy. (L410) (A106)	275.00 USD	0.10	27.50 USD
6	04/10/2024	Green,Stephanie	SMG	Analysis/Strategy Review/Analyze prior docket and issues that arose, testimony drafts, and outline questions for discussion in advance of call /PUCT-Overall Case Strategy. (L120) (A104)	275.00 USD	1.10	302.50 USD
7	04/10/2024	Green,Stephanie	SMG	Fact Witnesses Communicate with client re first drafts of testimony /PUCT-Overall Case Strategy. (L410) (A106)	275.00 USD	0.90	247.50 USD

	Date	TK Name	TK ID	Description	Effective Rate	Hours	Total
8	04/12/2024	Green,Stephanie	SMG	Fact Witnesses Communicate with client J. Sims re draft testimony edits /PUCT-Overall Case Strategy. (L410) (A106)	275.00 USD	0.20	55.00 USD
9	04/12/2024	Green,Stephanie	SMG	Fact Witnesses Communicate with client D. Deibel re draft testimony edits /PUCT-Overall Case Strategy. (L410) (A106)	275.00 USD	0.20	55.00 USD
10	04/19/2024	Green,Stephanie	SMG	Analysis/Strategy Review/Analyze correspondence from S. Mutiso re cost cap calculation /PUCT-Overall Case Strategy. (L120) (A104)	275.00 USD	0.20	55.00 USD
11	04/22/2024	Green,Stephanie	SMG	Analysis/Strategy Communicate with client S. Mutiso re status of drafts and schedules and workpapers for review /PUCT-Overall Case Strategy. (L120) (A106)	275.00 USD	0.10	27.50 USD
12	04/23/2024	Green,Stephanie	SMG	Analysis/Strategy Communicate with client L. Melhem et al. re final drafts, schedules, and exhibits /PUCT-Overall Case Strategy. (L120) (A106)	275.00 USD	0.40	110.00 USD
13	04/23/2024	Pearsall,Patrick	PJP	Analysis/Strategy Communicate with client L. Melhem re testimony development and case filing strategy /PUCT-Overall Case Strategy. (L120) (A106)	430.00 USD	0.20	86.00 USD
14	04/24/2024	Pearsall,Patrick	PJP	Pleadings Review/Analyze draft application /PUCT-Non-Discovery Pleadings and Motions. (L210) (A104)	430.00 USD	0.30	129.00 USD
15	04/24/2024	Green,Stephanie	SMG	Fact Witnesses Review/Analyze J. Sims testimony and supporting schedules /PUCT-Overall Case Strategy. (L410) (A104)	275.00 USD	0.90	247.50 USD
16	04/24/2024	Green,Stephanie	SMG	Pleadings Draft/Revise application /PUCT-Non-Discovery Pleadings and Motions. (L210) (A103)	275.00 USD	0.90	247.50 USD
17	04/24/2024	Green,Stephanie	SMG	Fact Witnesses Review/Analyze D. Deibel testimony and supporting schedules /PUCT-Overall Case Strategy. (L410) (A104)	275.00 USD	0.90	247.50 USD
18	04/24/2024	Green,Stephanie	SMG	Analysis/Strategy Communicate with client S. Mutiso, L. Melhem et al. re final testimony drafts /PUCT-Overall Case Strategy. (L120) (A106)	275.00 USD	0.30	82.50 USD

	Date	TK Name	TK ID	Description	Effective Rate	Hours	Total
19	04/24/2024	Green,Stephanie	SMG	Fact Witnesses Review/Analyze K. Abmas testimony and supporting schedules /PUCT-Overall Case Strategy. (L410) (A104)	275.00 USD	0.90	247.50 USD
20	04/24/2024	Green,Stephanie	SMG	Pleadings Draft/Revise RCE affidavit /PUCT-Non-Discovery Pleadings and Motions. (L210) (A103)	275.00 USD	0.20	55.00 USD
21	04/25/2024	Pearsall,Patrick	PJP	Fact Witnesses Communicate with client litigation team re review of J. Sims, K. Abmas, and D. Deibel draft testimonies /PUCT-Overall Case Strategy. (L410) (A106)	430.00 USD	1.30	559.00 USD
22	04/25/2024	Green,Stephanie	SMG	Analysis/Strategy Review/Analyze final drafts and identify outstanding schedules, workpapers, and data for filing /PUCT-Overall Case Strategy. (L120) (A104)	275.00 USD	0.80	220.00 USD
23	04/25/2024	Green,Stephanie	SMG	Analysis/Strategy Communicate with client S. Mutiso re status of final exhibits and workpaper and suggested edits to same /PUCT-Overall Case Strategy. (L120) (A106)	275.00 USD	0.40	110.00 USD
24	04/25/2024	Green,Stephanie	SMG	Analysis/Strategy Review/Analyze RCE supporting exhibit /PUCT-Overall Case Strategy. (L120) (A104)	275.00 USD	0.50	137.50 USD
25	04/25/2024	Pearsall,Patrick	PJP	Fact Witnesses Review/Analyze J. Sims, K. Abmas, and D. Deibel draft testimonies and related schedules /PUCT-Overall Case Strategy. (L410) (A104)	430.00 USD	1.40	602.00 USD
26	04/25/2024	Green,Stephanie	SMG	Fact Witnesses Communicate with client S. Mutiso et al. re outstanding schedules, workpapers, and confirm against testimony drafts /PUCT-Overall Case Strategy. (L410) (A106)	275.00 USD	1.40	385.00 USD
27	04/25/2024	Green,Stephanie	SMG	Fact Witnesses Communicate with client S. Mutiso et al. re finalizing filing package and final direct testimony drafts /PUCT-Overall Case Strategy. (L410) (A106)	275.00 USD	1.10	302.50 USD
28	04/25/2024	Pearsall,Patrick	PJP	Pleadings Communicate with client S. Mutiso, J. Griffin, and L. Melhem re filing of amended EEPR /PUCT-Non-Discovery Pleadings and Motions. (L210) (A106)	430.00 USD	0.20	86.00 USD

	Date	TK Name	TK ID	Description	Effective Rate	Hours	Total
29	04/26/2024	Green,Stephanie	SMG	Analysis/Strategy Communicate with client S. Mutiso et al. re application, amended EEPR filing, and edits and revisions to schedules /PUCT-Overall Case Strategy. (L120) (A106)	275.00 USD	0.20	55.00 USD
30	04/26/2024	Pearsall,Patrick	PJP	Pleadings Draft/Revise SWEPCO EECRF application /PUCT-Non-Discovery Pleadings and Motions. (L210) (A103)	430.00 USD	0.30	129.00 USD
31	04/26/2024	Green,Stephanie	SMG	Analysis/Strategy Communicate with client J. Griffin re Schedule /PUCT-Overall Case Strategy. (L120) (A106)	275.00 USD	0.20	55.00 USD
32	04/29/2024	Pearsall,Patrick	PJP	Pleadings Review/Analyze final testimony drafts and schedules /PUCT-Overall Case Strategy. (L210) (A104)	430.00 USD	1.40	602.00 USD
33	04/29/2024	Green,Stephanie	SMG	Analysis/Strategy Review/Analyze final testimony drafts, application and supporting schedules /PUCT-Overall Case Strategy. (L120) (A104)	275.00 USD	2.80	770.00 USD
34	04/30/2024	Pearsall,Patrick	PJP	Pleadings Communicate with client L. Melhem re finalizing testimony and application /PUCT-Overall Case Strategy. (L210) (A106)	430.00 USD	0.40	172.00 USD
35	04/30/2024	Green,Stephanie	SMG	Pleadings Communicate with client L. Melhem re RCE supporting documentation /PUCT-Overall Case Strategy. (L210) (A106)	275.00 USD	0.10	27.50 USD
36	04/30/2024	Green,Stephanie	SMG	Pleadings Review/Analyze filing package documents, application, final revisions, exhibits, schedules and workpapers /PUCT-Overall Case Strategy. (L210) (A104)	275.00 USD	2.40	660.00 USD
37	04/30/2024	Green,Stephanie	SMG	Pleadings Communicate with client T. Walker re application draft, tariff, and Protective Order attachment /PUCT-Overall Case Strategy. (L210) (A106)	275.00 USD	0.30	82.50 USD
38	04/30/2024	Pearsall,Patrick	PJP	Pleadings Review/Analyze final draft direct testimonies, application, and schedules /PUCT-Overall Case Strategy. (L210) (A104)	430.00 USD	1.80	774.00 USD

**Hours Total** **26.80**

**Fees** **8,501.50 USD**

**Fee Adjustments** **0.00 USD**

Fee Tax Total

0.00 USD

Invoice Level Discounts (1)

	Date	Type	Code	Description	Total
39	04/30/2024	Fee	TVD01	Tiered Volume Discount (TVD01)	-425.08 USD

Fee Discount Total -425.08 USD  
Fee Discount Tax Total 0.00 USD

Fees	8,501.50 USD
Fee Adjustments	0.00 USD
Expenses	0.00 USD
Exp Adjustments	0.00 USD
Invoice Discounts	-425.08 USD
Net Fees & Exp	8,076.42 USD
Taxes	0.00 USD
Invoice Total	8,076.42 USD
Paid	8,076.42 USD

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Invoice#: 41916

Matter: AEP-2024-4225867/SWEPSCO Texas 2024 EECRF - Docket No. 56552

<b>From: Duggins Wren Mann &amp; Romero, LLP</b> Austin TX United States  <b>To:</b>	Invoice#	41916	Fees	4,883.50 USD
	PO Number		Fee Adjustments	0.00 USD
	Invoice Date	Jun 13, 2024	Expenses	0.00 USD
	Due Date	Jul 13, 2024	Exp Adjustments	0.00 USD
	Start Date	May 01, 2024	Invoice Discounts	-244.18 USD
	End Date	May 31, 2024	<b>Net Fees &amp; Exp</b>	<b>4,639.32 USD</b>
	Submission Date	Jun 14, 2024	Taxes	0.00 USD
	Government Invoice Number		<b>Invoice Total</b>	<b>4,639.32 USD</b>
			Paid	4,639.32 USD

Fees (63)

	Date	TK Name	TK ID	Description	Effective Rate	Hours	Total
1	05/01/2024	Green,Stephanie	SMG	Pleadings Review/Analyze application and attachments /PUCT-Non-Discovery Pleadings and Motions. (L210) (A104)	275.00 USD	1.10	302.50 USD
2	05/01/2024	Pearsall,Patrick	PJP	Pleadings Review/Analyze final filing package /PUCT-Non-Discovery Pleadings and Motions. (L210) (A104)	430.00 USD	0.40	172.00 USD
3	05/01/2024	Jones,Jackie	JDJ	Pleadings Draft/Revise standard protective order /PUCT-Overall Case Strategy. (L210) (A103)	175.00 USD	0.30	52.50 USD
4	05/01/2024	Pearsall,Patrick	PJP	Pleadings Communicate with client L. Melhem re finalizing filing package /PUCT-Non-Discovery Pleadings and Motions. (L210) (A106)	430.00 USD	0.20	86.00 USD
5	05/01/2024	Green,Stephanie	SMG	Pleadings Communicate with client T. Walker, S. Mutiso, J. Sims, and L. Melhem re edits to filing package and preparation of same /PUCT-Non-Discovery Pleadings and Motions. (L210) (A106)	275.00 USD	0.60	165.00 USD
6	05/03/2024	Green,Stephanie	SMG	Written Discovery Communicate with client S. Mutiso re native schedules for EECRF filing and receipt of natives for same /PUCT-Discovery. (L310) (A106)	275.00 USD	0.50	137.50 USD
7	05/03/2024	Pearsall,Patrick	PJP	Written Discovery Communicate with client L. Melhem re Staff 1 RFIs /PUCT-Discovery. (L310) (A106)	430.00 USD	0.20	86.00 USD

	Date	TK Name	TK ID	Description	Effective Rate	Hours	Total
8	05/03/2024	Green,Stephanie	SMG	Written Discovery Review/Analyze Staff 1st RFIs to SWEPCO /PUCT-Discovery. (L310) (A104)	275.00 USD	0.20	55.00 USD
9	05/03/2024	Green,Stephanie	SMG	Analysis/Strategy Draft/Revise cover letter for workpaper and natives /PUCT-Non-Discovery Pleadings and Motions. (L210) (A103)	275.00 USD	0.20	55.00 USD
10	05/03/2024	Pearsall,Patrick	PJP	Written Discovery Review/Analyze Staff 1 RFIs /PUCT-Discovery. (L310) (A104)	430.00 USD	0.20	86.00 USD
11	05/03/2024	Green,Stephanie	SMG	Written Discovery Communicate with client T. Walker re Staff 1st RFIs /PUCT-Discovery. (L310) (A106)	275.00 USD	0.10	27.50 USD
12	05/03/2024	Green,Stephanie	SMG	Pleadings Communicate with client S. Mutiso re EEPR filing /PUCT-Non-Discovery Pleadings and Motions. (L210) (A106)	275.00 USD	0.20	55.00 USD
13	05/03/2024	Jones,Jackie	JDJ	Written Discovery Review/Analyze Staff 1 and update procedural calendar re same /PUCT-Discovery. (L310) (A104)	175.00 USD	0.20	35.00 USD
14	05/04/2024	Green,Stephanie	SMG	Pleadings Review/Analyze final native schedules and workpapers /PUCT-Non-Discovery Pleadings and Motions. (L210) (A104)	275.00 USD	1.20	330.00 USD
15	05/06/2024	Green,Stephanie	SMG	Pleadings Review/Analyze SOAH Order No. 1 /PUCT-Overall Case Strategy. (L210) (A104)	275.00 USD	0.10	27.50 USD
16	05/06/2024	Green,Stephanie	SMG	Pleadings Draft/Revise finalize cover letter and native schedules and workpapers /PUCT-Non-Discovery Pleadings and Motions. (L210) (A103)	275.00 USD	0.50	137.50 USD
17	05/06/2024	Pearsall,Patrick	PJP	Analysis/Strategy Review/Analyze SOAH Order No. 1 /PUCT-Overall Case Strategy. (L120) (A104)	430.00 USD	0.10	43.00 USD
18	05/06/2024	Pearsall,Patrick	PJP	Pleadings Review/Analyze issues re filing of supplemental workpaper and native version of filed schedules /PUCT-Non-Discovery Pleadings and Motions. (L210) (A104)	430.00 USD	0.10	43.00 USD
19	05/06/2024	Jones,Jackie	JDJ	Other Written Motions and Submissions Review/Analyze Order No. 1 and update procedural calendar re same /PUCT-Overall Case Procedures. (L250) (A104)	175.00 USD	0.20	35.00 USD

	Date	TK Name	TK ID	Description	Effective Rate	Hours	Total
20	05/07/2024	Green,Stephanie	SMG	Analysis/Strategy Draft/Revise pleading in response to Order No. 1 /PUCT-Overall Case Strategy. (L120) (A103)	275.00 USD	0.60	165.00 USD
21	05/07/2024	Green,Stephanie	SMG	Pleadings Communicate with other external A. Caviel from Staff re filing of schedules /PUCT-Non-Discovery Pleadings and Motions. (L210) (A108)	275.00 USD	0.10	27.50 USD
22	05/07/2024	Green,Stephanie	SMG	Analysis/Strategy Communicate with client team re procedural schedule and Order No. 1 /PUCT-Overall Case Strategy. (L120) (A106)	275.00 USD	0.20	55.00 USD
23	05/08/2024	Jones,Jackie	JDJ	Written Discovery Review/Analyze Staff 2 and update procedural calendar re same /PUCT-Discovery. (L310) (A104)	175.00 USD	0.10	17.50 USD
24	05/08/2024	Green,Stephanie	SMG	Analysis/Strategy Review/Analyze Proof of Notice filing /PUCT-Overall Case Strategy. (L120) (A104)	275.00 USD	0.10	27.50 USD
25	05/08/2024	Pearsall,Patrick	PJP	Written Discovery Review/Analyze Staff 2 RFIs /PUCT-Rate Case Expenses. (L310) (A104)	430.00 USD	0.20	86.00 USD
26	05/08/2024	Green,Stephanie	SMG	Analysis/Strategy Communicate with other external Staff A. Caviel re procedural schedule and pleading /PUCT-Overall Case Strategy. (L120) (A108)	275.00 USD	0.10	27.50 USD
27	05/08/2024	Green,Stephanie	SMG	Analysis/Strategy Review/Analyze Staff 2nd RFI to SWEPCO /PUCT-Overall Case Strategy. (L120) (A104)	275.00 USD	0.20	55.00 USD
28	05/08/2024	Green,Stephanie	SMG	Pleadings Communicate with client EE team re procedural schedule and pleading draft /PUCT-Overall Case Strategy. (L210) (A106)	275.00 USD	0.40	110.00 USD
29	05/08/2024	Pearsall,Patrick	PJP	Analysis/Strategy Review/Analyze communications re proposed procedural schedule /PUCT-Other Rate Case Procedural Matters. (L120) (A104)	430.00 USD	0.20	86.00 USD
30	05/09/2024	Green,Stephanie	SMG	Analysis/Strategy Communicate with other external TIEC re procedural schedule and motion to cancel pleading /PUCT-Overall Case Strategy. (L120) (A108)	275.00 USD	0.10	27.50 USD

	Date	TK Name	TK ID	Description	Effective Rate	Hours	Total
31	05/09/2024	Green,Stephanie	SMG	Analysis/Strategy Review/Analyze correspondence from L. Melhem and edits to agreed procedural schedule and motion to cancel pleading /PUCT-Overall Case Strategy. (L120) (A104)	275.00 USD	0.10	27.50 USD
32	05/09/2024	Green,Stephanie	SMG	Analysis/Strategy Communicate with client S. Mutiso et al. re Staff discovery requests /PUCT-Overall Case Strategy. (L120) (A106)	275.00 USD	0.20	55.00 USD
33	05/09/2024	Pearsall,Patrick	PJP	Written Discovery Review/Analyze issues re Staff 1 and 2 RFIs /PUCT-Discovery. (L310) (A104)	430.00 USD	0.20	86.00 USD
34	05/09/2024	Green,Stephanie	SMG	Analysis/Strategy Review/Analyze discovery requests and issues and prior responses to Staff requests and compare requests to documents and workpapers already provided /PUCT-Overall Case Strategy. (L120) (A104)	275.00 USD	1.40	385.00 USD
35	05/09/2024	Green,Stephanie	SMG	Pleadings Communicate with other external Staff counsel A. Caviel re procedural schedule and motion to cancel pleading /PUCT-Overall Case Strategy. (L210) (A108)	275.00 USD	0.10	27.50 USD
36	05/10/2024	Green,Stephanie	SMG	Written Discovery Communicate with client K. Abmas re draft discovery responses /PUCT-Discovery. (L310) (A106)	275.00 USD	0.10	27.50 USD
37	05/10/2024	Green,Stephanie	SMG	Written Discovery Communicate with client D. Deibel, J. Griffin re Staff's request for information /PUCT-Overall Case Strategy. (L310) (A106)	275.00 USD	0.20	55.00 USD
38	05/10/2024	Pearsall,Patrick	PJP	Written Discovery Review/Analyze issues re Staff 1 and 2 RFIs /PUCT-Discovery. (L310) (A104)	430.00 USD	0.20	86.00 USD
39	05/10/2024	Pearsall,Patrick	PJP	Written Discovery Communicate with client D. Deibel and J. Griffin re Staff 1 and 2 RFIs /PUCT-Discovery. (L310) (A106)	430.00 USD	0.10	43.00 USD
40	05/10/2024	Green,Stephanie	SMG	Analysis/Strategy Review/Analyze D. Deibel draft response re Staff 2nd /PUCT-Overall Case Strategy. (L120) (A104)	275.00 USD	0.20	55.00 USD
41	05/13/2024	Green,Stephanie	SMG	Analysis/Strategy Communicate with other external A. Caviel re filing and follow up questions re schedules /PUCT-Overall Case Strategy. (L120) (A108)	275.00 USD	0.20	55.00 USD

	Date	TK Name	TK ID	Description	Effective Rate	Hours	Total
42	05/13/2024	Green,Stephanie	SMG	Written Discovery Communicate with client S. Mutiso et al. re Staff's requests /PUCT-Overall Case Strategy. (L310) (A106)	275.00 USD	0.20	55.00 USD
43	05/14/2024	Green,Stephanie	SMG	Analysis/Strategy Communicate with client S. Mutiso re Staff's informal requests /PUCT-Overall Case Strategy. (L120) (A106)	275.00 USD	0.20	55.00 USD
44	05/14/2024	Green,Stephanie	SMG	Analysis/Strategy Review/Analyze correspondence from parties re agreed procedural schedule and motion to cancel prehearing conference /PUCT-Overall Case Strategy. (L120) (A104)	275.00 USD	0.20	55.00 USD
45	05/14/2024	Green,Stephanie	SMG	Analysis/Strategy Review/Analyze Schedule J additional data for Staff /PUCT-Overall Case Strategy. (L120) (A104)	275.00 USD	0.20	55.00 USD
46	05/14/2024	Green,Stephanie	SMG	Pleadings Draft/Revise responses to Staff 1st /PUCT-Non-Discovery Pleadings and Motions. (L210) (A103)	275.00 USD	0.40	110.00 USD
47	05/14/2024	Pearsall,Patrick	PJP	Written Discovery Communicate with client litigation support re Staff 2 /PUCT-Discovery. (L310) (A106)	430.00 USD	0.30	129.00 USD
48	05/14/2024	Green,Stephanie	SMG	Pleadings Review/Analyze correspondence from parties re agreed procedural schedule and motion to cancel prehearing conference /PUCT-Non-Discovery Pleadings and Motions. (L210) (A104)	275.00 USD	0.20	55.00 USD
49	05/14/2024	Green,Stephanie	SMG	Analysis/Strategy Communicate with client S. Mutiso et al. re Staff 1st /PUCT-Overall Case Strategy. (L120) (A106)	275.00 USD	0.50	137.50 USD
50	05/15/2024	Green,Stephanie	SMG	Analysis/Strategy Draft/Revise, finalize and file agreed procedural schedule and motion to cancel prehearing conference /PUCT-Overall Case Strategy. (L120) (A103)	275.00 USD	0.10	27.50 USD
51	05/16/2024	Green,Stephanie	SMG	Analysis/Strategy Communicate with client litigation team re draft responses to Staff discovery /PUCT-Overall Case Strategy. (L120) (A106)	275.00 USD	0.20	55.00 USD

	Date	TK Name	TK ID	Description	Effective Rate	Hours	Total
52	05/16/2024	Green,Stephanie	SMG	Analysis/Strategy Communicate with other external Staff counsel A. Caviel re filing supplemental workpapers /PUCT-Discovery. (L120) (A108)	275.00 USD	0.10	27.50 USD
53	05/16/2024	Green,Stephanie	SMG	Analysis/Strategy Review/Analyze Staff recommendation on sufficiency /PUCT-Overall Case Strategy. (L120) (A104)	275.00 USD	0.10	27.50 USD
54	05/16/2024	Green,Stephanie	SMG	Written Discovery Review/Analyze draft responses to Staff discovery /PUCT-Discovery. (L310) (A104)	275.00 USD	0.30	82.50 USD
55	05/17/2024	Jones,Jackie	JDJ	Other Written Motions and Submissions Review/Analyze SOAH Order No. 2 and update procedural calendar re same /PUCT-Overall Case Procedures. (L250) (A104)	175.00 USD	0.10	17.50 USD
56	05/22/2024	Green,Stephanie	SMG	Analysis/Strategy Communicate with client T. Walker re finalizing responses to Staff 1 /PUCT-Discovery. (L310) (A106)	275.00 USD	0.40	110.00 USD
57	05/23/2024	Pearsall,Patrick	PJP	Written Discovery Review/Analyze finalized responses to Staff 2 /PUCT-Discovery. (L310) (A104)	430.00 USD	0.20	86.00 USD
58	05/24/2024	Green,Stephanie	SMG	Written Discovery Communicate with client team re Staff 2 discovery responses /PUCT-Discovery. (L310) (A106)	275.00 USD	0.20	55.00 USD
59	05/24/2024	Green,Stephanie	SMG	Written Discovery Review/Analyze final Staff 2nd response /PUCT-Discovery. (L310) (A104)	275.00 USD	0.20	55.00 USD
60	05/30/2024	Pearsall,Patrick	PJP	Written Discovery Review/Analyze Staff 3 RFIs /PUCT-Discovery. (L310) (A104)	430.00 USD	0.10	43.00 USD
61	05/30/2024	Jones,Jackie	JDJ	Written Discovery Review/Analyze Staff 3 and update procedural calendar re same /PUCT-Discovery. (L310) (A104)	175.00 USD	0.10	17.50 USD
62	05/31/2024	Green,Stephanie	SMG	Written Discovery Communicate with client S. Mutiso and J. Sims re Staff's 3 RFIs /PUCT-Discovery. (L310) (A106)	275.00 USD	0.20	55.00 USD
63	05/31/2024	Green,Stephanie	SMG	Analysis/Strategy Review/Analyze draft response to Staff 3 /PUCT-Discovery. (L310) (A104)	275.00 USD	0.20	55.00 USD

**Hours Total** 16.60

**Fees** 4,883.50 USD

**Fee Adjustments** 0.00 USD

Fee Tax Total

0.00 USD

Invoice Level Discounts (1)

	Date	Type	Code	Description	Total
64	05/31/2024	Fee	TVD01	Tiered Volume Discount (TVD01)	-244.18 USD

Fee Discount Total -244.18 USD  
Fee Discount Tax Total 0.00 USD

Fees	4,883.50 USD
Fee Adjustments	0.00 USD
Expenses	0.00 USD
Exp Adjustments	0.00 USD
Invoice Discounts	-244.18 USD
Net Fees & Exp	4,639.32 USD
Taxes	0.00 USD
Invoice Total	4,639.32 USD
Paid	4,639.32 USD

This invoice was sent using BILLINGPOINT

**PAID****Invoice#: 42158**

Matter: AEP-2024-4225867/SWEPCO Texas 2024 EECRF - Docket No. 56552

<b>From: Duggins Wren Mann &amp; Romero, LLP</b>	Invoice#	42158	Fees	851.00 USD
Austin TX	PO Number		Fee Adjustments	0.00 USD
United States	Invoice Date	Jul 12, 2024	Expenses	0.00 USD
	Due Date	Aug 12, 2024	Exp Adjustments	0.00 USD
	Start Date	Jun 04, 2024	Invoice Discounts	-59.57 USD
	End Date	Jun 30, 2024	<b>Net Fees &amp; Exp</b>	<b>791.43 USD</b>
<b>To:</b>	Submission Date	Jul 12, 2024	Taxes	0.00 USD
	Government Invoice Number		<b>Invoice Total</b>	<b>791.43 USD</b>
			Paid	791.43 USD

**Fees (16)**

	Date	TK Name	TK ID	Description	Effective Rate	Hours	Total
1	06/04/2024	Green,Stephanie	SMG	Written Discovery Review/Analyze Staff's 3rd set of RFIs /PUCT-Discovery. (L310) (A104)	275.00 USD	0.10	27.50 USD
2	06/05/2024	Green,Stephanie	SMG	Written Discovery Communicate with client S. Mutiso et al. re Staff's 3rd RFIs /PUCT-Discovery. (L310) (A106)	275.00 USD	0.20	55.00 USD
3	06/10/2024	Green,Stephanie	SMG	Written Discovery Review/Analyze draft responses to Staff's 3rd RFIs /PUCT-Discovery. (L310) (A104)	275.00 USD	0.20	55.00 USD
4	06/12/2024	Jones,Jackie	JDJ	Written Discovery Review/Analyze Staff 4 and update procedural calendar re same /PUCT-Discovery. (L310) (A104)	175.00 USD	0.20	35.00 USD
5	06/19/2024	Green,Stephanie	SMG	Written Discovery Communicate with client T. Walker re finalizing discovery responses for Staff's 3rd /PUCT-Discovery. (L310) (A106)	275.00 USD	0.10	27.50 USD
6	06/20/2024	Green,Stephanie	SMG	Written Discovery Communicate with other external Staff counsel A. Caviel re Staff cost allocation issue /PUCT-Discovery. (L310) (A108)	275.00 USD	0.20	55.00 USD
7	06/20/2024	Green,Stephanie	SMG	Written Discovery Communicate with client S. Mutiso et al. re Staff issue and coordinating follow up with Staff expert /PUCT-Discovery. (L310) (A106)	275.00 USD	0.20	55.00 USD



	Date	TK Name	TK ID	Description	Effective Rate	Hours	Total
8	06/20/2024	Pearsall, Patrick	PJP	Written Discovery Review/Analyze issues re pending Staff discovery /PUCT-Discovery. (L310) (A104)	430.00 USD	0.20	86.00 USD
9	06/21/2024	Green,Stephanie	SMG	Analysis/Strategy Communicate with client S. Mutiso et al. re communications with Staff re admin and R&D cost issue /PUCT-Discovery. (L120) (A106)	275.00 USD	0.20	55.00 USD
10	06/21/2024	Green,Stephanie	SMG	Written Discovery Communicate with other external Staff counsel A. Caviel and T. Gotora re Staff request for information on admin and R&D costs /PUCT-Discovery. (L310) (A108)	275.00 USD	0.20	55.00 USD
11	06/23/2024	Green,Stephanie	SMG	Written Discovery Communicate with other external Staff counsel A. Caviel to follow up re subject matter expert discussions /PUCT-Discovery. (L310) (A108)	275.00 USD	0.10	27.50 USD
12	06/24/2024	Green,Stephanie	SMG	Written Discovery Communicate with client S. Mutiso, et al. re Staff informal questions /PUCT-Discovery. (L310) (A106)	275.00 USD	0.10	27.50 USD
13	06/24/2024	Jones,Jackie	JDJ	Other Written Motions and Submissions Review/Analyze SOAH Order 2 and update procedural calendar re same /PUCT-Overall Case Procedures. (L250) (A104)	175.00 USD	0.40	70.00 USD
14	06/26/2024	Green,Stephanie	SMG	Written Discovery Communicate with client S. Mutiso, et al. re Staff informal discovery issues /PUCT-Discovery. (L310) (A106)	275.00 USD	0.30	82.50 USD
15	06/26/2024	Green,Stephanie	SMG	Written Discovery Review/Analyze call for Staff's 4th RFI responses /PUCT-Discovery. (L310) (A104)	275.00 USD	0.40	110.00 USD
16	06/26/2024	Green,Stephanie	SMG	Written Discovery Communicate with other external Staff counsel A. Caviel to follow up on pending issues /PUCT-Discovery. (L310) (A108)	275.00 USD	0.10	27.50 USD

<b>Hours Total</b>	<b>3.20</b>
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<b>Fees</b>	<b>851.00 USD</b>
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<b>Fee Adjustments</b>	<b>0.00 USD</b>
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<b>Fee Tax Total</b>	<b>0.00 USD</b>
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## Invoice Level Discounts (1)

Date	Type	Code	Description	Total
17	06/30/2024	Fee	TVD01	Tiered Volume Discount (TVD01)
				-59.57 USD

Fee Discount Total	-59.57 USD
Fee Discount Tax Total	0.00 USD

Fees	851.00 USD
Fee Adjustments	0.00 USD
Expenses	0.00 USD
Exp Adjustments	0.00 USD
Invoice Discounts	-59.57 USD
<b>Net Fees &amp; Exp</b>	<b>791.43 USD</b>
Taxes	0.00 USD
<b>Invoice Total</b>	<b>791.43 USD</b>
Paid	791.43 USD

This invoice was sent using BILLINGPOINT

PAID  
Invoice#: 42354

Matter: AEP-2024-4225867/SWEPCO Texas 2024 EECRF - Docket No. 56552

<b>From: Duggins Wren Mann &amp; Romero, LLP</b> Austin TX United States  <b>To:</b>	Invoice#	42354	Fees	3,078.00 USD
	PO Number		Fee Adjustments	0.00 USD
	Invoice Date	Aug 14, 2024	Expenses	0.00 USD
	Due Date	Sep 14, 2024	Exp Adjustments	0.00 USD
	Start Date	Jul 01, 2024	Invoice Discounts	-215.46 USD
	End Date	Jul 31, 2024	<b>Net Fees &amp; Exp</b>	<b>2,862.54 USD</b>
	Submission Date	Aug 14, 2024	Taxes	0.00 USD
	Government Invoice Number		<b>Invoice Total</b>	<b>2,862.54 USD</b>
			Paid	2,862.54 USD

Fees (40)

	Date	TK Name	TK ID	Description	Effective Rate	Hours	Total
1	07/01/2024	Green,Stephanie	SMG	Settlement/Non-binding ADR Communicate with other external Staff counsel D. King re status of proceeding and settlement conference /PUCT-Settlement Activities. (L160) (A108)	275.00 USD	0.20	55.00 USD
2	07/01/2024	Pearsall,Patrick	PJP	Settlement/Non-binding ADR Review/Analyze issues re timing and preparation for settlement conference /PUCT-Settlement Activities. (L160) (A104)	430.00 USD	0.20	86.00 USD
3	07/02/2024	Pearsall,Patrick	PJP	Settlement/Non-binding ADR Review/Analyze issues re settlement conference /PUCT-Settlement Activities. (L160) (A104)	430.00 USD	0.20	86.00 USD
4	07/02/2024	Green,Stephanie	SMG	Settlement/Non-binding ADR Communicate with other external J. Griffin, S. Mutiso et al. re settlement conference with parties /PUCT-Settlement Activities. (L160) (A108)	275.00 USD	0.50	137.50 USD
5	07/02/2024	Green,Stephanie	SMG	Settlement/Non-binding ADR Communicate with other external TIEC counsel C. Rice re settlement conference /PUCT-Settlement Activities. (L160) (A108)	275.00 USD	0.20	55.00 USD

	Date	TK Name	TK ID	Description	Effective Rate	Hours	Total
6	07/02/2024	Green,Stephanie	SMG	Settlement/Non-binding ADR Communicate with other external Staff counsel D. King re settlement conference and outstanding issues in proceeding /PUCT-Settlement Activities. (L160) (A108)	275.00 USD	0.20	55.00 USD
7	07/03/2024	Pearsall,Patrick	PJP	Settlement/Non-binding ADR Appear for/attend settlement conference with Staff and Intervenor counsel /PUCT-Settlement Activities. (L160) (A109)	430.00 USD	0.20	86.00 USD
8	07/03/2024	Green,Stephanie	SMG	Settlement/Non-binding ADR Communicate with other external Staff counsel A. Caviel re settlement conference and meeting with subject-matter experts related to cost allocation issue /PUCT-Settlement Activities. (L160) (A108)	275.00 USD	0.20	55.00 USD
9	07/03/2024	Jones,Jackie	JDJ	Written Discovery Manage Data/Files re discovery hearing record /PUCT-Discovery. (L310) (A110)	175.00 USD	0.20	35.00 USD
10	07/03/2024	Green,Stephanie	SMG	Settlement/Non-binding ADR Appear for/attend settlement conference with parties /PUCT-Settlement Activities. (L160) (A109)	275.00 USD	0.20	55.00 USD
11	07/03/2024	Green,Stephanie	SMG	Settlement/Non-binding ADR Communicate with client S. Mutiso, J. Griffin et al. re strategy for settlement conference /PUCT-Settlement Activities. (L160) (A106)	275.00 USD	0.20	55.00 USD
12	07/03/2024	Pearsall,Patrick	PJP	Settlement/Non-binding ADR Communicate with client litigation team re settlement conference /PUCT-Settlement Activities. (L160) (A106)	430.00 USD	0.20	86.00 USD
13	07/08/2024	Green,Stephanie	SMG	Settlement/Non-binding ADR Communicate with other external Staff counsel A. Caviel and D. King re cost allocation issue /PUCT-Settlement Activities. (L160) (A108)	275.00 USD	0.20	55.00 USD
14	07/09/2024	Green,Stephanie	SMG	Analysis/Strategy Communicate with other external Staff re cost allocation issue concerning AEP Texas and SWEPCO methodology /PUCT-Overall Case Procedures. (L120) (A108)	275.00 USD	0.10	27.50 USD

	Date	TK Name	TK ID	Description	Effective Rate	Hours	Total
15	07/09/2024	Green,Stephanie	SMG	Analysis/Strategy Communicate with client team re Staff issue and strategy and coordination related to same /PUCT-Overall Case Procedures. (L120) (A106)	275.00 USD	0.40	110.00 USD
16	07/09/2024	Green,Stephanie	SMG	Pleadings Plan and prepare for draft motion to abate proceeding /PUCT-Non-Discovery Pleadings and Motions. (L210) (A101)	275.00 USD	0.30	82.50 USD
17	07/10/2024	Green,Stephanie	SMG	Written Discovery Review/Analyze correspondence from J. Griffin et al. re analysis of Staff cost allocation methodology issue /PUCT-Discovery. (L310) (A104)	275.00 USD	0.20	55.00 USD
18	07/11/2024	Green,Stephanie	SMG	Settlement/Non-binding ADR Review/Analyze status of coordination re cost allocation issue presented by Staff and follow up related to potential settlement /PUCT-Settlement Activities. (L160) (A104)	275.00 USD	0.20	55.00 USD
19	07/12/2024	Green,Stephanie	SMG	Settlement/Non-binding ADR Communicate with client S. Mutiso et al. re coordination on cost allocation issue presented by Staff /PUCT-Settlement Activities. (L160) (A106)	275.00 USD	0.20	55.00 USD
20	07/16/2024	Pearsall,Patrick	PJP	Pleadings Review/Analyze draft motion to abate /PUCT-Non-Discovery Pleadings and Motions. (L210) (A104)	430.00 USD	0.10	43.00 USD
21	07/19/2024	Green,Stephanie	SMG	Written Discovery Communicate with client S. Mutiso et al. re status of matter and communications with Staff /PUCT-Settlement Activities. (L310) (A106)	275.00 USD	0.20	55.00 USD
22	07/19/2024	Pearsall,Patrick	PJP	Analysis/Strategy Review/Analyze issues re Staff settlement position and potential proposed reduction to performance bonus /PUCT-Overall Case Strategy. (L120) (A104)	430.00 USD	0.20	86.00 USD
23	07/19/2024	Green,Stephanie	SMG	Pleadings Communicate with other external TIEC counsel C. Rice re motion to abate and status of matter in light of Staff issue /PUCT-Non-Discovery Pleadings and Motions. (L210) (A108)	275.00 USD	0.30	82.50 USD

	Date	TK Name	TK ID	Description	Effective Rate	Hours	Total
24	07/19/2024	Green,Stephanie	SMG	Pleadings Communicate with other external Staff counsel A. Caviel re motion to abate and staff issue identified in matter /PUCT-Non-Discovery Pleadings and Motions. (L210) (A108)	275.00 USD	0.30	82.50 USD
25	07/22/2024	Pearsall,Patrick	PJP	Fact Investigation/Development Review/Analyze issues re status of Staff position on settlement /PUCT-Settlement Activities. (L110) (A104)	430.00 USD	0.10	43.00 USD
26	07/23/2024	Green,Stephanie	SMG	Expert Witnesses Communicate with client S. Mutiso et al. re anticipated Staff testimony filing and issues /PUCT-Settlement Activities. (L420) (A106)	275.00 USD	0.20	55.00 USD
27	07/23/2024	Green,Stephanie	SMG	Settlement/Non-binding ADR Communicate with other external Staff counsel A. Caviel re Staff issues, testimony, and status of settlement negotiations /PUCT-Settlement Activities. (L160) (A108)	275.00 USD	0.20	55.00 USD
28	07/24/2024	Green,Stephanie	SMG	Analysis/Strategy Communicate with client J. Griffin re communications with Staff /PUCT-Overall Case Strategy. (L120) (A106)	275.00 USD	0.20	55.00 USD
29	07/26/2024	Pearsall,Patrick	PJP	Expert Witnesses Communicate with client litigation team re Staff testimony /PUCT-Overall Case Strategy. (L420) (A106)	430.00 USD	0.60	258.00 USD
30	07/26/2024	Green,Stephanie	SMG	Settlement/Non-binding ADR Communicate with client J. Griffin, S. Mutiso, L. Melhem et al. re strategy for follow up to Staff settlement offer /PUCT-Settlement Activities. (L160) (A106)	275.00 USD	0.30	82.50 USD
31	07/26/2024	Green,Stephanie	SMG	Expert Witnesses Communicate with client J. Griffin and S. Mutiso re coordinating follow up to Staff testimony /PUCT-Overall Case Strategy. (L420) (A106)	275.00 USD	0.20	55.00 USD
32	07/26/2024	Green,Stephanie	SMG	Expert Witnesses Review/Analyze testimonies filed by E. Blanchard and T. Gotora of Staff /PUCT-Overall Case Strategy. (L420) (A104)	275.00 USD	0.50	137.50 USD
33	07/26/2024	Pearsall,Patrick	PJP	Expert Witnesses Review/Analyze Staff witness testimony /PUCT-Overall Case Strategy. (L420) (A104)	430.00 USD	0.30	129.00 USD

	Date	TK Name	TK ID	Description	Effective Rate	Hours	Total
34	07/29/2024	Green,Stephanie	SMG	Settlement/Non-binding ADR Review/Analyze correspondence from A. Caviel re resuming settlement discussion in matter /PUCT-Settlement Activities. (L160) (A104)	275.00 USD	0.20	55.00 USD
35	07/29/2024	Pearsall,Patrick	PJP	Settlement/Non-binding ADR Communicate with client S. Mutiso and litigation team re settlement position and strategy /PUCT-Settlement Activities. (L160) (A106)	430.00 USD	0.30	129.00 USD
36	07/29/2024	Green,Stephanie	SMG	Analysis/Strategy Communicate with client J. Griffin and S. Mutiso re Company review of Staff testimony and strategy for proceeding with Staff /PUCT-Overall Case Strategy. (L120) (A106)	275.00 USD	0.40	110.00 USD
37	07/30/2024	Green,Stephanie	SMG	Settlement/Non-binding ADR Communicate with client A. Caviel re resumption of settlement discussions /PUCT-Settlement Activities. (L160) (A106)	275.00 USD	0.20	55.00 USD
38	07/30/2024	Green,Stephanie	SMG	Analysis/Strategy Communicate with client S. Mutiso et al. re Staff testimony issues /PUCT-Overall Case Strategy. (L120) (A106)	275.00 USD	0.30	82.50 USD
39	07/30/2024	Pearsall,Patrick	PJP	Analysis/Strategy Communicate with client M. Gage re Staff position on cost cap and proposed disallowance /PUCT-Overall Case Strategy. (L120) (A106)	430.00 USD	0.20	86.00 USD
40	07/31/2024	Green,Stephanie	SMG	Settlement/Non-binding ADR Communicate with client A. Caviel re settlement negotiation issues /PUCT-Settlement Activities. (L160) (A106)	275.00 USD	0.20	55.00 USD
						<b>Hours Total</b>	<b>9.80</b>
						<b>Fees</b>	<b>3,078.00 USD</b>
						<b>Fee Adjustments</b>	<b>0.00 USD</b>
						<b>Fee Tax Total</b>	<b>0.00 USD</b>

## Invoice Level Discounts (1)

	Date	Type	Code	Description	Total
41	07/31/2024	Fee	TVD01	Tiered Volume Discount (TVD01)	-215.46 USD

**Fee Discount Total** -215.46 USD

**Fee Discount Tax Total** 0.00 USD

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Fees	3,078.00 USD
Fee Adjustments	0.00 USD
Expenses	0.00 USD
Exp Adjustments	0.00 USD
Invoice Discounts	-215.46 USD
<b>Net Fees &amp; Exp</b>	<b>2,862.54 USD</b>
Taxes	0.00 USD
<b>Invoice Total</b>	<b>2,862.54 USD</b>
Paid	2,862.54 USD

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This invoice was sent using **BILLINGPOINT**



PAID  
Invoice#: 42521

Matter: AEP-2024-4225867/SWEPCO Texas 2024 EECRF - Docket No. 56552

<b>From: Duggins Wren Mann &amp; Romero, LLP</b> Austin TX United States  <b>To:</b>	Invoice#	42521	Fees	5,682.50 USD
	PO Number		Fee Adjustments	0.00 USD
	Invoice Date	Sep 12, 2024	Expenses	0.00 USD
	Due Date	Oct 12, 2024	Exp Adjustments	0.00 USD
	Start Date	Aug 01, 2024	Invoice Discounts	-397.78 USD
	End Date	Aug 31, 2024	<b>Net Fees &amp; Exp</b>	<b>5,284.72 USD</b>
	Submission Date	Sep 12, 2024	Taxes	0.00 USD
	Government Invoice Number		<b>Invoice Total</b>	<b>5,284.72 USD</b>
			Paid	5,284.72 USD

Fees (52)

	Date	TK Name	TK ID	Description	Effective Rate	Hours	Total
1	08/01/2024	Green,Stephanie	SMG	Settlement/Non-binding ADR Communicate with client with J. Griffin, S. Mutiso et al. re settlement and preparation of settlement schedules and workpapers /PUCT-Settlement Activities. (L160) (A106)	275.00 USD	0.20	55.00 USD
2	08/01/2024	Green,Stephanie	SMG	Settlement/Non-binding ADR Communicate with client L. Melhem et al. re settlement strategy /PUCT-Settlement Activities. (L160) (A106)	275.00 USD	0.30	82.50 USD
3	08/01/2024	Green,Stephanie	SMG	Settlement/Non-binding ADR Communicate with other external A. Caviel, Staff, re Staff cost cap issue /PUCT-Settlement Activities. (L160) (A108)	275.00 USD	0.20	55.00 USD
4	08/01/2024	Pearsall,Patrick	PJP	Settlement/Non-binding ADR Communicate with client litigation team re Staff settlement position and strategy re same /PUCT-Settlement Activities. (L160) (A106)	430.00 USD	0.70	301.00 USD
5	08/01/2024	Green,Stephanie	SMG	Settlement/Non-binding ADR Review/Analyze PUCT dockets re cost cap issue and response to same /PUCT-Settlement Activities. (L160) (A104)	275.00 USD	0.30	82.50 USD

	Date	TK Name	TK ID	Description	Effective Rate	Hours	Total
6	08/02/2024	Green,Stephanie	SMG	Analysis/Strategy Review/Analyze correspondence from D. Miller, S. Mutiso et al. re resolution on issues /PUCT-Overall Case Strategy. (L120) (A104)	275.00 USD	0.20	55.00 USD
7	08/02/2024	Green,Stephanie	SMG	Analysis/Strategy Communicate with other external C. Rice, TIEC, re motion to abate /PUCT-Overall Case Strategy. (L120) (A108)	275.00 USD	0.10	27.50 USD
8	08/02/2024	Green,Stephanie	SMG	Analysis/Strategy Communicate with other external A. Caviel, Staff, re motion to abate /PUCT-Overall Case Strategy. (L120) (A108)	275.00 USD	0.20	55.00 USD
9	08/02/2024	Green,Stephanie	SMG	Analysis/Strategy Draft/Revise motion to abate proceeding /PUCT-Overall Case Strategy. (L120) (A103)	275.00 USD	0.20	55.00 USD
10	08/02/2024	Green,Stephanie	SMG	Analysis/Strategy Review/Analyze motion to abate /PUCT-Overall Case Strategy. (L120) (A104)	275.00 USD	0.20	55.00 USD
11	08/05/2024	Green,Stephanie	SMG	Analysis/Strategy Review/Analyze SOAH Order No. 3 abating case /PUCT-Overall Case Strategy. (L120) (A104)	275.00 USD	0.10	27.50 USD
12	08/05/2024	Jones,Jackie	JDJ	Other Written Motions and Submissions Review/Analyze SOAH Order No. 3 and update procedural calendar re same /PUCT-Overall Case Procedures. (L250) (A104)	175.00 USD	0.20	35.00 USD
13	08/05/2024	Pearsall,Patrick	PJP	Analysis/Strategy Review/Analyze SOAH Order 3 granting abatement /PUCT-Overall Case Strategy. (L120) (A104)	430.00 USD	0.10	43.00 USD
14	08/08/2024	Green,Stephanie	SMG	Written Discovery Review/Analyze TIEC notice /PUCT-Settlement Activities. (L310) (A104)	275.00 USD	0.10	27.50 USD
15	08/13/2024	Green,Stephanie	SMG	Settlement/Non-binding ADR Draft/Revise settlement documents for internal review /PUCT-Settlement Activities. (L160) (A103)	275.00 USD	3.60	990.00 USD
16	08/14/2024	Green,Stephanie	SMG	Settlement/Non-binding ADR Draft/Revise settlement documents for internal circulation /PUCT-Settlement Activities. (L160) (A103)	275.00 USD	0.50	137.50 USD

	Date	TK Name	TK ID	Description	Effective Rate	Hours	Total
17	08/14/2024	Green,Stephanie	SMG	Settlement/Non-binding ADR Communicate with client J. Griffin, L. Melhem et al. re settlement package for review /PUCT-Settlement Activities. (L160) (A106)	275.00 USD	0.20	55.00 USD
18	08/15/2024	Pearsall,Patrick	PJP	Pleadings Review/Analyze communications with J. Griffin re revisions to draft Proposed Order /PUCT-Non-Discovery Pleadings and Motions. (L210) (A104)	430.00 USD	0.20	86.00 USD
19	08/15/2024	Pearsall,Patrick	PJP	Analysis/Strategy Communicate with client litigation team re bonus calculations and potential errata to testimony and schedules reflecting same /PUCT-Overall Case Strategy. (L120) (A106)	430.00 USD	0.40	172.00 USD
20	08/15/2024	Green,Stephanie	SMG	Settlement/Non-binding ADR Communicate with client S. Mutiso re Staff calculations in support of Staff recommended adjustment /PUCT-Settlement Activities. (L160) (A106)	275.00 USD	0.10	27.50 USD
21	08/15/2024	Pearsall,Patrick	PJP	Analysis/Strategy Review/Analyze issues re strategy for preparing and filing errata addressing bonus calculation /PUCT-Overall Case Strategy. (L120) (A104)	430.00 USD	0.20	86.00 USD
22	08/15/2024	Green,Stephanie	SMG	Settlement/Non-binding ADR Communicate with client J. Griffin et al. re suggested edits to settlement drafts /PUCT-Settlement Activities. (L160) (A106)	275.00 USD	0.40	110.00 USD
23	08/15/2024	Green,Stephanie	SMG	Settlement/Non-binding ADR Communicate with client S. Mutiso et al. re performance bonus issue identified in filing /PUCT-Settlement Activities. (L160) (A106)	275.00 USD	0.50	137.50 USD
24	08/16/2024	Pearsall,Patrick	PJP	Analysis/Strategy Review/Analyze issues re impact of corrected performance bonus calculation /PUCT-Overall Case Strategy. (L120) (A104)	430.00 USD	0.20	86.00 USD
25	08/16/2024	Green,Stephanie	SMG	Analysis/Strategy Review/Analyze correspondence and summary from S. Mutiso re performance bonus calculation issue /PUCT-Overall Case Strategy. (L120) (A104)	275.00 USD	0.40	110.00 USD
26	08/18/2024	Green,Stephanie	SMG	Analysis/Strategy Review/Analyze corrections related to errata preparation /PUCT-Overall Case Strategy. (L120) (A104)	275.00 USD	0.20	55.00 USD

	Date	TK Name	TK ID	Description	Effective Rate	Hours	Total
27	08/19/2024	Pearsall, Patrick	PJP	Analysis/Strategy Review/Analyze issues re update to performance bonus calculation /PUCT-Overall Case Strategy. (L120) (A104)	430.00 USD	0.30	129.00 USD
28	08/19/2024	Green, Stephanie	SMG	Analysis/Strategy Communicate with client with L. Melhem re updated performance bonus calculation issue and approach to errata corrections /PUCT-Overall Case Strategy. (L120) (A106)	275.00 USD	0.20	55.00 USD
29	08/20/2024	Green, Stephanie	SMG	Pleadings Communicate with client L. Melhem re identification of issue and preparation of errata /PUCT-Non-Discovery Pleadings and Motions. (L210) (A106)	275.00 USD	0.20	55.00 USD
30	08/20/2024	Pearsall, Patrick	PJP	Settlement/Non-binding ADR Communicate with client L. Melhem re case and settlement status /PUCT-Settlement Activities. (L160) (A106)	430.00 USD	0.20	86.00 USD
31	08/20/2024	Pearsall, Patrick	PJP	Pleadings Review/Analyze issues re preparation of errata addressing performance bonus calculation /PUCT-Non-Discovery Pleadings and Motions. (L210) (A104)	430.00 USD	0.20	86.00 USD
32	08/21/2024	Pearsall, Patrick	PJP	Pleadings Communicate with client J. Griffin, D. Deibel, S. Mutiso re errata to testimony and schedules to reflect updated performance bonus calculation /PUCT-Non-Discovery Pleadings and Motions. (L210) (A106)	430.00 USD	0.30	129.00 USD
33	08/22/2024	Green, Stephanie	SMG	Pleadings Communicate with client J. Griffin et al. re preparation of errata /PUCT-Non-Discovery Pleadings and Motions. (L210) (A106)	275.00 USD	0.30	82.50 USD
34	08/22/2024	Green, Stephanie	SMG	Analysis/Strategy Communicate with client L. Melhem re status of matter and status report for filing /PUCT-Overall Case Strategy. (L120) (A106)	275.00 USD	0.10	27.50 USD
35	08/22/2024	Pearsall, Patrick	PJP	Pleadings Review/Analyze issues re allocation of legal costs in errata filing /PUCT-Non-Discovery Pleadings and Motions. (L210) (A104)	430.00 USD	0.20	86.00 USD

	Date	TK Name	TK ID	Description	Effective Rate	Hours	Total
36	08/23/2024	Green,Stephanie	SMG	Analysis/Strategy Communicate with other external TIEC counsel J. Zhu re status of matter and anticipated errata filing /PUCT-Overall Case Strategy. (L120) (A108)	275.00 USD	0.10	27.50 USD
37	08/23/2024	Green,Stephanie	SMG	Analysis/Strategy Communicate with client L. Melhem re communication with parties and status report filing /PUCT-Overall Case Strategy. (L120) (A106)	275.00 USD	0.20	55.00 USD
38	08/23/2024	Green,Stephanie	SMG	Analysis/Strategy Review/Analyze status report /PUCT-Overall Case Strategy. (L120) (A104)	275.00 USD	0.20	55.00 USD
39	08/23/2024	Green,Stephanie	SMG	Analysis/Strategy Communicate with other external Staff counsel A. Caviel re status report filing and anticipated errata filing /PUCT-Overall Case Strategy. (L120) (A108)	275.00 USD	0.10	27.50 USD
40	08/25/2024	Green,Stephanie	SMG	Analysis/Strategy Review/Analyze errata versions of testimonies and schedules /PUCT-Overall Case Strategy. (L120) (A104)	275.00 USD	1.70	467.50 USD
41	08/25/2024	Green,Stephanie	SMG	Pleadings Communicate with client L. Melhem et al. re review of draft errata filing /PUCT-Non-Discovery Pleadings and Motions. (L210) (A106)	275.00 USD	0.20	55.00 USD
42	08/25/2024	Green,Stephanie	SMG	Pleadings Draft/Revise errata pleading /PUCT-Non-Discovery Pleadings and Motions. (L210) (A103)	275.00 USD	1.20	330.00 USD
43	08/26/2024	Pearsall,Patrick	PJP	Pleadings Communicate with client L. Melhem re errata to account updated performance bonus calculation /PUCT-Non-Discovery Pleadings and Motions. (L210) (A106)	430.00 USD	0.10	43.00 USD
44	08/26/2024	Jones,Jackie	JDJ	Document/File Management Review/Analyze status report and update procedural calendar re same /PUCT-Overall Case Procedures. (L140) (A104)	175.00 USD	0.10	17.50 USD
45	08/26/2024	Green,Stephanie	SMG	Analysis/Strategy Communicate with client S. Mutiso, L. Melhem et al. re errata schedules and preparation of filing /PUCT-Overall Case Strategy. (L120) (A106)	275.00 USD	0.50	137.50 USD

	Date	TK Name	TK ID	Description	Effective Rate	Hours	Total
46	08/26/2024	Green,Stephanie	SMG	Pleadings Communicate with other external Staff counsel A. Caviel re errata filing /PUCT-Non-Discovery Pleadings and Motions. (L210) (A108)	275.00 USD	0.20	55.00 USD
47	08/26/2024	Pearsall,Patrick	PJP	Pleadings Review/Analyze issues re performance bonus calculation errata /PUCT-Non-Discovery Pleadings and Motions. (L210) (A104)	430.00 USD	0.20	86.00 USD
48	08/27/2024	Green,Stephanie	SMG	Pleadings Communicate with client L. Melhem et al. re errata filing /PUCT-Non-Discovery Pleadings and Motions. (L210) (A106)	275.00 USD	0.20	55.00 USD
49	08/27/2024	Green,Stephanie	SMG	Pleadings Review/Analyze and finalize errata filing /PUCT-Non-Discovery Pleadings and Motions. (L210) (A104)	275.00 USD	1.20	330.00 USD
50	08/27/2024	Pearsall,Patrick	PJP	Pleadings Communicate with client J. Griffin re scope of errata pleading /PUCT-Non-Discovery Pleadings and Motions. (L210) (A106)	430.00 USD	0.20	86.00 USD
51	08/29/2024	Green,Stephanie	SMG	Settlement/Non-binding ADR Communicate with other external Staff counsel A. Caviel re Staff review of errata package and settlement follow up /PUCT-Settlement Activities. (L160) (A108)	275.00 USD	0.20	55.00 USD
52	08/30/2024	Green,Stephanie	SMG	Settlement/Non-binding ADR Communicate with other external Staff counsel A. Caviel re status of Staff review of errata and settlement terms /PUCT-Settlement Activities. (L160) (A108)	275.00 USD	0.20	55.00 USD
						<b>Hours Total</b>	<b>18.80</b>
						<b>Fees</b>	<b>5,682.50 USD</b>
						<b>Fee Adjustments</b>	<b>0.00 USD</b>
						<b>Fee Tax Total</b>	<b>0.00 USD</b>

## Invoice Level Discounts (1)

Date	Type	Code	Description	Total
53	08/31/2024	Fee	TVD01	-397.78 USD

Tiered Volume Discount; 5682.5 @ 7.0%; 3; 1

**Fee Discount Total** **-397.78 USD**

Fee Discount Tax Total

0.00 USD

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Fees	5,682.50 USD
Fee Adjustments	0.00 USD
Expenses	0.00 USD
Exp Adjustments	0.00 USD
Invoice Discounts	-397.78 USD
<b>Net Fees &amp; Exp</b>	<b>5,284.72 USD</b>
Taxes	0.00 USD
<b>Invoice Total</b>	<b>5,284.72 USD</b>
Paid	5,284.72 USD

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This invoice was sent using BILLINGPOINT

**PAID****Invoice#: 42772**

Matter: AEP-2024-4225867/SWEPCO Texas 2024 EECRF - Docket No. 56552

<b>From: Duggins Wren Mann &amp; Romero, LLP</b>	Invoice#	42772	Fees	2,343.50 USD
Austin TX	PO Number		Fee Adjustments	0.00 USD
United States	Invoice Date	Oct 11, 2024	Expenses	0.00 USD
	Due Date	Nov 11, 2024	Exp Adjustments	0.00 USD
	Start Date	Sep 04, 2024	Invoice Discounts	-164.05 USD
	End Date	Sep 30, 2024	<b>Net Fees &amp; Exp</b>	<b>2,179.45 USD</b>
<b>To:</b>	Submission Date	Oct 11, 2024	Taxes	0.00 USD
	Government Invoice Number		<b>Invoice Total</b>	<b>2,179.45 USD</b>
			Paid	2,179.45 USD

**Fees (32)**

	Date	TK Name	TK ID	Description	Effective Rate	Hours	Total
1	09/04/2024	Green,Stephanie	SMG	Settlement/Non-binding ADR Communicate with other external A. Caviel re Staff review of errata filing and settlement documents plan /PUCT-Settlement Activities. (L160) (A108)	275.00 USD	0.20	55.00 USD
2	09/05/2024	Pearsall,Patrick	PJP	Pleadings Review/Analyze draft status update /PUCT-Non-Discovery Pleadings and Motions. (L210) (A104)	430.00 USD	0.10	43.00 USD
3	09/05/2024	Green,Stephanie	SMG	Settlement/Non-binding ADR Communicate with client J. Griffin, S. Mutiso et al. re status update regarding Staff review of errata filing and settlement /PUCT-Settlement Activities. (L160) (A106)	275.00 USD	0.20	55.00 USD
4	09/05/2024	Pearsall,Patrick	PJP	Settlement/Non-binding ADR Review/Analyze issues re status of Staff review of errata and updated settlement package /PUCT-Settlement Activities. (L160) (A104)	430.00 USD	0.20	86.00 USD
5	09/05/2024	Green,Stephanie	SMG	Analysis/Strategy Review/Analyze joint status report /PUCT-Non-Discovery Pleadings and Motions. (L120) (A104)	275.00 USD	0.20	55.00 USD
6	09/06/2024	Green,Stephanie	SMG	Pleadings Review/Analyze joint status report /PUCT-Non-Discovery Pleadings and Motions. (L210) (A104)	275.00 USD	0.20	55.00 USD



	Date	TK Name	TK ID	Description	Effective Rate	Hours	Total
7	09/06/2024	Green,Stephanie	SMG	Pleadings Communicate with client S. Mutiso re joint status report /PUCT-Non-Discovery Pleadings and Motions. (L210) (A106)	275.00 USD	0.10	27.50 USD
8	09/06/2024	Pearsall,Patrick	PJP	Pleadings Communicate with client S. Mutiso and J. Griffin re status update filing /PUCT-Non-Discovery Pleadings and Motions. (L210) (A106)	430.00 USD	0.20	86.00 USD
9	09/06/2024	Green,Stephanie	SMG	Pleadings Communicate with other external parties re joint status report filing /PUCT-Non-Discovery Pleadings and Motions. (L210) (A108)	275.00 USD	0.20	55.00 USD
10	09/10/2024	Pearsall,Patrick	PJP	Settlement/Non-binding ADR Review/Analyze Staff calculations re performance bonus based on errata filing /PUCT-Settlement Activities. (L160) (A104)	430.00 USD	0.20	86.00 USD
11	09/10/2024	Green,Stephanie	SMG	Settlement/Non-binding ADR Communicate with other external A. Caviel re Staff review of errata /PUCT-Settlement Activities. (L160) (A108)	275.00 USD	0.20	55.00 USD
12	09/10/2024	Green,Stephanie	SMG	Settlement/Non-binding ADR Communicate with client S. Mutiso, D. Deibel et al. re review of Staff recommendation /PUCT-Settlement Activities. (L160) (A106)	275.00 USD	0.30	82.50 USD
13	09/11/2024	Green,Stephanie	SMG	Settlement/Non-binding ADR Communicate with other external A. Caviel re Staff calculation and recommendation /PUCT-Settlement Activities. (L160) (A108)	275.00 USD	0.30	82.50 USD
14	09/11/2024	Green,Stephanie	SMG	Settlement/Non-binding ADR Communicate with client S. Mutiso and J. Griffin re Staff calculation and recommendation /PUCT-Settlement Activities. (L160) (A106)	275.00 USD	0.20	55.00 USD
15	09/12/2024	Jones,Jackie	JDJ	Pleadings Review/Analyze status report and update procedural calendar re same /PUCT-Overall Case Procedures. (L210) (A104)	175.00 USD	0.10	17.50 USD
16	09/15/2024	Green,Stephanie	SMG	Settlement/Non-binding ADR Communicate with client S. Mutiso, D. Deibel re communication with Staff and resolution and preparation of settlement tariff and workpapers /PUCT-Settlement Activities. (L160) (A106)	275.00 USD	0.20	55.00 USD

	Date	TK Name	TK ID	Description	Effective Rate	Hours	Total
17	09/16/2024	Green,Stephanie	SMG	Settlement/Non-binding ADR Communicate with client S. Mutiso, L. Melhem et al. re review of updated settlement documents and edits to same /PUCT-Settlement Activities. (L160) (A106)	275.00 USD	0.70	192.50 USD
18	09/16/2024	Green,Stephanie	SMG	Settlement/Non-binding ADR Review/Analyze settlement documents based on communication with Staff and resolution of issues /PUCT-Settlement Activities. (L160) (A104)	275.00 USD	0.80	220.00 USD
19	09/20/2024	Green,Stephanie	SMG	Settlement/Non-binding ADR Communicate with client J. Griffin, S. Mutiso et al. re status report filing /PUCT-Settlement Activities. (L160) (A106)	275.00 USD	0.20	55.00 USD
20	09/20/2024	Jones,Jackie	JDJ	Pleadings Review/Analyze status report and update procedural calendar re same /PUCT-Overall Case Procedures. (L210) (A104)	175.00 USD	0.10	17.50 USD
21	09/20/2024	Green,Stephanie	SMG	Settlement/Non-binding ADR Draft/Revise and finalize status report /PUCT-Settlement Activities. (L160) (A103)	275.00 USD	0.20	55.00 USD
22	09/20/2024	Green,Stephanie	SMG	Settlement/Non-binding ADR Communicate with other external A. Caviel, J. Zhu re status report filing /PUCT-Settlement Activities. (L160) (A108)	275.00 USD	0.20	55.00 USD
23	09/21/2024	Green,Stephanie	SMG	Settlement/Non-binding ADR Communicate with client S. Mutiso, L. Melhem, J. Griffin et al. re Staff edits to settlement documents /PUCT-Settlement Activities. (L160) (A106)	275.00 USD	0.20	55.00 USD
24	09/23/2024	Green,Stephanie	SMG	Settlement/Non-binding ADR Communicate with client D. Deibel, J. Griffin, S. Morgan, S. Mutiso re Staff's review of settlement documents and updates to SWEPCO EECRF tariff documents /PUCT-Settlement Activities. (L160) (A106)	275.00 USD	0.40	110.00 USD
25	09/25/2024	Green,Stephanie	SMG	Settlement/Non-binding ADR Communicate with client J. Griffin and S. Mutiso re status of communication with Staff /PUCT-Settlement Activities. (L160) (A106)	275.00 USD	0.20	55.00 USD

	Date	TK Name	TK ID	Description	Effective Rate	Hours	Total
26	09/25/2024	Green,Stephanie	SMG	Settlement/Non-binding ADR Communicate with other external A. Caviel re settlement documents /PUCT-Settlement Activities. (L160) (A108)	275.00 USD	0.20	55.00 USD
27	09/26/2024	Green,Stephanie	SMG	Settlement/Non-binding ADR Communicate with other external A. Caviel re confirmation of settlement data and review of proposed order /PUCT-Settlement Activities. (L160) (A108)	275.00 USD	0.40	110.00 USD
28	09/26/2024	Green,Stephanie	SMG	Settlement/Non-binding ADR Communicate with client and circulate final settlement package for parties' sign off /PUCT-Settlement Activities. (L160) (A106)	275.00 USD	0.20	55.00 USD
29	09/26/2024	Green,Stephanie	SMG	Pleadings Communicate with client S. Mutiso, J. Griffin, D. Deibel, et al. re communication with Staff and preparation of documents /PUCT-Non-Discovery Pleadings and Motions. (L210) (A106)	275.00 USD	0.40	110.00 USD
30	09/26/2024	Green,Stephanie	SMG	Settlement/Non-binding ADR Communicate with client L. Melhem, J. Griffin, et al. re circulation of final settlement documents /PUCT-Settlement Activities. (L160) (A106)	275.00 USD	0.20	55.00 USD
31	09/27/2024	Green,Stephanie	SMG	Settlement/Non-binding ADR Communicate with client L. Melhem re finalized settlement documents /PUCT-Settlement Activities. (L160) (A106)	275.00 USD	0.10	27.50 USD
32	09/27/2024	Green,Stephanie	SMG	Settlement/Non-binding ADR Draft/Revise settlement documents /PUCT-Settlement Activities. (L160) (A103)	275.00 USD	0.60	165.00 USD
						<b>Hours Total</b>	<b>8.20</b>
						<b>Fees</b>	<b>2,343.50 USD</b>
						<b>Fee Adjustments</b>	<b>0.00 USD</b>
						<b>Fee Tax Total</b>	<b>0.00 USD</b>

## Invoice Level Discounts (1)

Date	Type	Code	Description	Total
33	09/30/2024	Fee	TVD01	-164.05 USD

Tiered Volume Discount; 2343.5 @ 7.0%; 3; 1

Fee Discount Total	-164.05 USD
Fee Discount Tax Total	0.00 USD

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Fees	2,343.50 USD
Fee Adjustments	0.00 USD
Expenses	0.00 USD
Exp Adjustments	0.00 USD
Invoice Discounts	-164.05 USD
<b>Net Fees &amp; Exp</b>	<b>2,179.45 USD</b>
Taxes	0.00 USD
<b>Invoice Total</b>	<b>2,179.45 USD</b>
Paid	2,179.45 USD

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This invoice was sent using **BILLINGPOINT**

PAID  
Invoice#: 42945

Matter: AEP-2024-4225867/SWEPCO Texas 2024 EECRF - Docket No. 56552

<b>From: Duggins Wren Mann &amp; Romero, LLP</b> Austin TX United States  <b>To:</b>	Invoice#	42945	Fees	1,394.00 USD
	PO Number		Fee Adjustments	0.00 USD
	Invoice Date	Nov 14, 2024	Expenses	0.00 USD
	Due Date	Dec 14, 2024	Exp Adjustments	0.00 USD
	Start Date	Oct 04, 2024	Invoice Discounts	-97.58 USD
	End Date	Oct 31, 2024	<b>Net Fees &amp; Exp</b>	<b>1,296.42 USD</b>
	Submission Date	Nov 14, 2024	Taxes	0.00 USD
	Government Invoice Number		<b>Invoice Total</b>	<b>1,296.42 USD</b>
			Paid	1,296.42 USD

Fees (18)

	Date	TK Name	TK ID	Description	Effective Rate	Hours	Total
1	10/04/2024	Green,Stephanie	SMG	Analysis/Strategy Communicate with client J. Griffin re issues related to Staff petition for secondary cost cap /PUCT-Overall Case Strategy. (L120) (A106)	275.00 USD	0.20	55.00 USD
2	10/04/2024	Pearsall,Patrick	PJP	Analysis/Strategy Review/Analyze SOAH Order No. 4 /PUCT-Overall Case Strategy. (L120) (A104)	430.00 USD	0.10	43.00 USD
3	10/04/2024	Green,Stephanie	SMG	Pleadings Review/Analyze SOAH Order No. 4 dismissing docket and admitting evidence /PUCT-Overall Case Strategy. (L210) (A104)	275.00 USD	0.10	27.50 USD
4	10/09/2024	Green,Stephanie	SMG	Expert Witnesses Communicate with client S. Mutiso, J. Griffin, L. Melhem et al. re strategy for Commission Staff petition to establish secondary cost cap /PUCT-Overall Case Strategy. (L420) (A106)	275.00 USD	0.40	110.00 USD
5	10/09/2024	Green,Stephanie	SMG	Analysis/Strategy Review/Analyze petition from Staff re secondary cost cap /PUCT-Overall Case Strategy. (L120) (A104)	275.00 USD	0.40	110.00 USD
6	10/10/2024	Green,Stephanie	SMG	Analysis/Strategy Review/Analyze correspondence from J. Griffin re analysis of Staff petition impact /PUCT-Overall Case Strategy. (L120) (A104)	275.00 USD	0.20	55.00 USD

	Date	TK Name	TK ID	Description	Effective Rate	Hours	Total
7	10/11/2024	Green,Stephanie	SMG	Pleadings Review/Analyze correspondence from J. Griffin re SWEPCO proposed order issued by OPDM /PUCT-Non-Discovery Pleadings and Motions. (L210) (A104)	275.00 USD	0.10	27.50 USD
8	10/14/2024	Pearsall,Patrick	PJP	Pleadings Review/Analyze issues re potential corrections to proposed order /PUCT-Non-Discovery Pleadings and Motions. (L210) (A104)	430.00 USD	0.20	86.00 USD
9	10/14/2024	Green,Stephanie	SMG	Pleadings Review/Analyze and compare changes and edits in OPDM proposed order, confirm edits and substantive issues /PUCT-Non-Discovery Pleadings and Motions. (L210) (A104)	275.00 USD	0.80	220.00 USD
10	10/14/2024	Green,Stephanie	SMG	Pleadings Communicate with client J. Griffin, S. Mutiso, et al. re OPDM proposed order and comparison with proposed order submitted by parties and potential corrections /PUCT-Non-Discovery Pleadings and Motions. (L210) (A106)	275.00 USD	0.30	82.50 USD
11	10/17/2024	Green,Stephanie	SMG	Pleadings Communicate with client S. Mutiso re corrections filing /PUCT-Non-Discovery Pleadings and Motions. (L210) (A106)	275.00 USD	0.10	27.50 USD
12	10/18/2024	Green,Stephanie	SMG	Analysis/Strategy Communicate with client J. Griffin and team re Staff's petition for secondary cost cap /PUCT-Overall Case Strategy. (L120) (A106)	275.00 USD	0.70	192.50 USD
13	10/21/2024	Green,Stephanie	SMG	Analysis/Strategy Communicate with other external Staff A. Caviel re proposed corrections /PUCT-Non-Discovery Pleadings and Motions. (L120) (A108)	275.00 USD	0.10	27.50 USD
14	10/21/2024	Green,Stephanie	SMG	Pleadings Draft/Revise proposed order corrections pleading to client team /PUCT-Non-Discovery Pleadings and Motions. (L210) (A103)	275.00 USD	0.40	110.00 USD
15	10/21/2024	Green,Stephanie	SMG	Analysis/Strategy Review/Analyze correspondence from D. Miller re updated staff petition for secondary cap /PUCT-Overall Case Strategy. (L120) (A104)	275.00 USD	0.10	27.50 USD

	Date	TK Name	TK ID	Description	Effective Rate	Hours	Total
16	10/23/2024	Green,Stephanie	SMG	Pleadings Draft/Revise proposed order corrections pleading /PUCT-Non-Discovery Pleadings and Motions. (L210) (A103)	275.00 USD	0.10	27.50 USD
17	10/23/2024	Green,Stephanie	SMG	Analysis/Strategy Communicate with other external Staff re filing of corrections /PUCT-Overall Case Strategy. (L120) (A108)	275.00 USD	0.20	55.00 USD
18	10/25/2024	Green,Stephanie	SMG	Analysis/Strategy Review/Analyze summary points provided by J. Griffin re comments for Staff petition related to secondary cost caps and provide additions to same /PUCT-Overall Case Strategy. (L120) (A104)	275.00 USD	0.40	110.00 USD

Hours Total	4.90
Fees	1,394.00 USD
Fee Adjustments	0.00 USD
Fee Tax Total	0.00 USD

Invoice Level Discounts (1)

	Date	Type	Code	Description	Total
19	10/31/2024	Fee	TVD01		-97.58 USD
Tiered Volume Discount; 1394.0 @ 7.0%; 3; 1					

Fee Discount Total	-97.58 USD
Fee Discount Tax Total	0.00 USD

Fees	1,394.00 USD
Fee Adjustments	0.00 USD
Expenses	0.00 USD
Exp Adjustments	0.00 USD
Invoice Discounts	-97.58 USD
Net Fees & Exp	1,296.42 USD
Taxes	0.00 USD
Invoice Total	1,296.42 USD
Paid	1,296.42 USD

This invoice was sent using BILLINGPOINT

PAID  
Invoice#: 43159

Matter: AEP-2024-4225867/SWEPCO Texas 2024 EECRF - Docket No. 56552

<b>From: Duggins Wren Mann &amp; Romero, LLP</b> Austin TX United States  <b>To:</b>	Invoice#	43159	Fees	385.00 USD
	PO Number		Fee Adjustments	0.00 USD
	Invoice Date	Dec 11, 2024	Expenses	0.00 USD
	Due Date	Jan 11, 2025	Exp Adjustments	0.00 USD
	Start Date	Nov 04, 2024	Invoice Discounts	-26.95 USD
	End Date	Nov 30, 2024	<b>Net Fees &amp; Exp</b>	<b>358.05 USD</b>
	Submission Date	Dec 11, 2024	Taxes	0.00 USD
	Government Invoice Number		<b>Invoice Total</b>	<b>358.05 USD</b>
			Paid	358.05 USD

Fees (6)

	Date	TK Name	TK ID	Description	Effective Rate	Hours	Total
1	11/04/2024	Green,Stephanie	SMG	Analysis/Strategy Communicate with client L. Melhem and team re development of utility comments in response to Staff's petition /PUCT-Overall Case Strategy. (L120) (A106)	275.00 USD	0.20	55.00 USD
2	11/05/2024	Green,Stephanie	SMG	Analysis/Strategy Review/Analyze proposed revisions to drafts and J. Griffin correspondence re same /PUCT-Overall Case Strategy. (L120) (A104)	275.00 USD	0.60	165.00 USD
3	11/11/2024	Green,Stephanie	SMG	Analysis/Strategy Review/Analyze correspondence from L. Melhem re outreach to Staff /PUCT-Overall Case Strategy. (L120) (A104)	275.00 USD	0.10	27.50 USD
4	11/11/2024	Green,Stephanie	SMG	Analysis/Strategy Communicate with other external joint utilities regarding outreach to Staff /PUCT-Overall Case Strategy. (L120) (A108)	275.00 USD	0.20	55.00 USD
5	11/15/2024	Green,Stephanie	SMG	Analysis/Strategy Review/Analyze correspondence from J. Griffin re EECRF approval and issues raised in ONCOR EECRF in light of Staff petition /PUCT-Overall Case Strategy. (L120) (A104)	275.00 USD	0.20	55.00 USD
6	11/22/2024	Green,Stephanie	SMG	Analysis/Strategy Review/Analyze draft list of issues for joint utility filing /PUCT-Overall Case Strategy. (L120) (A104)	275.00 USD	0.10	27.50 USD



Hours Total	1.40
Fees	385.00 USD
Fee Adjustments	0.00 USD
Fee Tax Total	0.00 USD

Invoice Level Discounts (1)

Date	Type	Code	Description	Total
7	11/30/2024	Fee	TVD01	-26.95 USD

Tiered Volume Discount; 385.0 @ 7.0%; 3; 1

Fee Discount Total	-26.95 USD
Fee Discount Tax Total	0.00 USD

Fees	385.00 USD
Fee Adjustments	0.00 USD
Expenses	0.00 USD
Exp Adjustments	0.00 USD
Invoice Discounts	-26.95 USD
Net Fees & Exp	358.05 USD
Taxes	0.00 USD
Invoice Total	358.05 USD
Paid	358.05 USD

This invoice was sent using BILLINGPOINT

PUC DOCKET NO. 58014  
PUBLIC UTILITY COMMISSION OF TEXAS  
  
APPLICATION OF  
SOUTHWESTERN ELECTRIC POWER COMPANY  
  
TO ADJUST ITS  
ENERGY EFFICIENCY COST RECOVERY FACTOR AND RELATED RELIEF

DIRECT TESTIMONY OF  
MONTANA K. FICHTEL  
  
FOR  
SOUTHWESTERN ELECTRIC POWER COMPANY

May 1, 2025

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1 I. INTRODUCTION

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

3 A. My name is Montana K. Fichtel. I am an Energy Efficiency and Consumer Programs  
4 Coordinator Associate for Southwestern Electric Power Company (SWEPCO or the  
5 Company). My business address is 3708 W 7<sup>th</sup> Street, Texarkana, TX 75501.

6 Q. PLEASE STATE YOUR EDUCATIONAL AND PROFESSIONAL BACKGROUND.

7 A. I received a Bachelor's degree from Henderson State University in 2023. I began my  
8 employment at SWEPCO in July 2023 as an Energy Efficiency and Consumer  
9 Programs Coordinator Associate. In November 2024, my responsibilities transitioned.  
10 I am responsible for verifying the compliance of our programs with SWEPCO's goals  
11 and the regulatory rules of each of the state's public utility commissions within our  
12 service territories, including the Public Utility Commission of Texas (PUCT).

13 Q. DO YOU SPONSOR ANY OF THE SCHEDULES ACCOMPANYING SWEPCO'S  
14 FILING?

15 A. Yes, I sponsor Schedules L, M, N, O, R, S, and Q. In addition, I co-sponsor Schedules  
16 J and P with SWEPCO witness Robert W. Paddy. I co-sponsor Schedules A and B with  
17 SWEPCO witnesses Paddy and Jonathan Griffin.