BEFORE THE

LOUISIANA PUBLIC SERVICE COMMISSION

IN RE: FOLLOW UP QUESTIONS TO
ELECTRIC UTILITIES ON WINTER
STORM EVENT

SOUTHWESTERN ELECTRIC POWER COMPANY'S REPONSES TO
STAFF'S 1ST REQUEST FOR INFORMATION

Question 1:

***Questions pertaining to the Distribution Grid*:**
How many MW of generation were offline or otherwise subject to unplanned outages during the Winter Storms?

Response 1:

Please see 2021 Winter Storm Staff 1-1, CONFIDENTIAL Attachment 1 for the requested information.

2021 Winter Storm Staff 1-1, CONFIDENTIAL Attachment 1 is being provided to the Commission and Staff pursuant to Commission Rule 12.1.

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Question 2:

***Questions pertaining to the Distribution Grid*:**
What were all identified causes of storm related outages for generation during the Winter Storms for your system? Please also indicate what was the main contributing factor.

Response 2:

Please see 2021 Winter Storm Staff 1-1, CONFIDENTIAL Attachment 1 for the requested information.

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Question 3:

***Questions pertaining to the Distribution Grid*:**
How many miles of distribution and transmission lines do you own and manage in Louisiana? Please separate your response by distribution and transmission.

Response 3:

SWEPCO owns and manages approximately 9,134 primary line miles for distribution (all underbuild excluded) and 730 miles of transmission line in Louisiana.

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Question 4:

***Questions pertaining to the Distribution Grid*:**
Did any part of your bulk transmission system suffer unplanned outages as a result of the Winter Storm? Please include the following in your response:

a. The length of lines affected;

b. The specific cause of the outage;

c. The time span each line was offline;

d. The expected return to full service time and date; and/or

e. The actual return to service of these lines.

Response 4:

Yes. SWEPCO's transmission system did experience unplanned outages during the time period from February 9th through February 20th as a result of the Extreme Cold Weather Event. For purposes of this response, SWEPCO is providing information on all transmission outages, including those on bulk electric system (BES) equipment (100 kV and above), and on non-BES transmission equipment. However, no permanent outages (5 minutes or greater) were sustained on BES equipment, and only two momentary outages were experienced on BES equipment.

The transmission system equipment that experienced an unplanned outage has been identified in the attached document, *Q4 Confidential SWEPCO Extreme Cold Weather Event Outages*. These outages include all unplanned outages for the identified time frame, and may include some outages not directly attributable to the Extreme Cold Weather Event. Information contained in this document includes length of lines affected (if applicable), cause of the outage, duration of the outage, and the expected or actual return time.

For the outages that have been attributed to weather (ice/snow), ice accumulation was likely a contributing factor for many of these outages. As part of the damage assessment and restoration

process, field crews respond to unplanned equipment outages to determine whether sustained damages occurred or if the equipment can be restored to service. Based on the Extreme Cold Weather Event damage assessment, it was determined that permanent outages were attributable to trees from outside of the right of way falling into the line.

Q4 Confidential SWEPCO Extreme Cold Weather Event Outages is being provided to the Commission and Staff pursuant to Commission Rule 12.1

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Question 5:

***Questions pertaining to the Distribution Grid*:**
Was any of the utility's bulk transmission system or generating units offline due to planned maintenance when the Winter Storm event was declared? If yes, please provide:

a. The name of the transmission system and/or generating unit(s);

b. The size (KV) and length of the transmission lines, if applicable;

c. Why such maintenance was scheduled in February 2021 as opposed to another time period.

Response 5:

a. Yes, at the time the Winter Storm event was declared, Stall Plant units 6A, 6B, and 6S were offline for scheduled maintenance. The 6A, 6B, and 6S outages ended on February 9 at 12:06 p.m., 10:06 a.m., and 2:29 p.m., respectively.

b. Yes. Select pieces of SWEPCO's transmission equipment were offline due to planned maintenance during the time period from February 9th through February 20th when the Extreme Cold Weather Event occurred. The equipment that was undergoing planned maintenance is identified in the attached document, *Q5 Confidential SWEPCO Planned Outages*. Information contained in this document includes name of the equipment, the voltage, and the length of the line (if applicable).

   All planned maintenance work requiring a transmission outage goes through an extensive vetting process. The vetting process includes extensive internal review and an analysis of potential impacts of the work on the transmission system, in addition to approval from the Southwest Power Pool. Some planned maintenance is part of a capital project that is sequential and long-term. Therefore, SWEPCO does not have flexibility to cancel such an outage that is part of a long-term project; at the time the project is initiated, future weather events cannot be predicted with certainty. All work that was scheduled to begin

on the dates from February 11th through February 20th was cancelled due to the weather to minimize potential customer impact and system outages.

c. Prior to the Winter Storm Event, the Stall Plant began a scheduled Maintenance Outage to repair equipment that, if not addressed, had a high potential for causing a forced unit outage prior to the next Planned Outage. During the Winter Storm Event period, Stall 6A, 6B, and 6S were offline a total of 12, 10, and 15 hours, respectively. Taking this Maintenance Outage ensured planning and repairs could be completed in the most efficient manner possible, minimizing down time and avoiding potential collateral damage.

Q5 Confidential SWEPCO Planned Outages is being provided to the Commission and Staff pursuant to Commission Rule 12.1.

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Question 6:

***Questions pertaining to the Distribution Grid*:**
What was the average restoration time for power outages due to storm damage from the Winter Storms?

Response 6:

The average restoration time for transmission power outages due to storm damage from the Winter event was 15.16 hours.

The average restoration time for distribution power outages due to storm damage from the Winter event was 1,299.2 minutes or 21.7 hours.

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Question 7:

***Questions pertaining to the Distribution Grid*:**
How heavily do you rely on contracted crews (compared to your own linemen) to restore power during normal [1] outages?

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[1] Normal outages would be non-emergency events, whereas emergency events are hurricanes or a scenario like the Winter Storms.

Response 7:

The Transmission Field Services Line team in the SWEPCO area has 16 internal Full Time Equivalents and 15 normally on-system contractors that are managed for daily response and "normal" system restoration activities. These teams will respond to issues on the Transmission lines including items such as failed equipment and vegetation contact such as trees falling into the lines. For most events (70% of "normal" outages), we prioritize internal resources to provide timely response and supplement with contract resources as needed.

The Transmission Field Services Station and Protection & Control teams rely solely on internal resources for "normal" outages. These teams will respond to issues inside the substation related to equipment or their associated protective relays and controls.

Distribution uses internal resources to handle "normal" outages. There have been some exceptions recently, some service centers having internal resources out due to COVID-19 at which time we were able to use contracted crews to supplement.

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Question 8:

***Questions pertaining to the Distribution Grid*:**
How heavily did you rely on contracted crews (compared to your own linemen) to restore power during the Winter Storms?

Response 8:

The Transmission Line team in the SWEPCO area has 16 internal Full Time Equivalents and 15 normally on-system contractors that are managed for daily response and "normal" system restoration activities. These teams will respond to issues on the Transmission lines including items such as failed equipment and vegetation contact such as trees falling into the lines.
For more severe events, AEP Transmission prepares to bring in additional internal Transmission line resources, as well as additional contractors, with a typical total resource split of 20% internal and 80% contractors.

As part of our storm planning and preparation for the February 2021 Winter Storm, AEP Transmission secured an additional 175 contract Transmission Line and support resources and 10 internal Transmission Line resources. 40 of these additional resources arrived in Louisiana before damage assessments had been completed. The damage assessed was less severe than expected, so these and the other contractors being mobilized and those in transit were released, as their additional services were deemed unnecessary to complement existing resources in Louisiana.

Additionally, during the storm planning and preparation, AEP Transmission mobilized 80 normally on-system vegetation management contractors from Indiana, Michigan and Ohio. Once the storm damage was assessed and before the contractors arrived, the resources were released, as their additional services were deemed unnecessary to complement existing resources in Louisiana.

The Transmission Field Services Station and Protection & Control teams rely primarily on internal resources. During the planning and preparation for the Winter Storm, TFS investigated available Station and Protection and Control internal and contract resources, but ultimately did

not utilize any additions.

Distribution began preparing for the first forecasted event on Thursday Feb 11, forecasted to take place beginning the evening of Sunday Feb. 14 into Monday Feb. 15. On Feb. 12, distribution requested mutual assistance to arrive on Sunday, ready to work Monday. Distribution received an additional 418 FTEs from mutual assistance (MA) to add to the internal complement of 308 FTEs. First round of winter precipitation passed through SWEPCO territory leaving only minor impact on the distribution system.

On Feb. 15, SWEPCO Distribution began evaluating the next forecasted ice event, forecasting a major ice storm for the four lower districts at SWEPCO. Forecast for heaviest freezing rain to be around the I-20 corridor and south, targeting Longview, Shreveport, South Texarkana and Valley districts. In response to the "wave 2" event SWEPCO decided to keep the MA resources on stand-by and requested an additional 2500 D-line.

On Feb. 16, Weather forecast showed the 1/2" to 1" of ice path to move a little south reducing the impact on the Texarkana District with a possible stronger impact to the SWEPCO southern areas. MA had secured 1720 D-line FTES, and SWEPCO agreed to accept the 1720 and not increase resource counts due to the change in forecast and the projected impact in SWEPCO service territory.

SWEPCO restored power after "wave 2" with 308 internal D-line and 803 contracted D-line from mutual assistance. Several companies had such difficulty traveling the roads they were not able to make it to SWEPCO.

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Question 9:

***<u>Questions pertaining to the Distribution Grid</u>*:**
Could any of those outages been prevented with different preparation or enhanced vegetation maintenance prior to the Winter Storms?

a. If outages were caused by fallen or sagging tree limbs, could those outages have been prevented with better vegetation maintenance by your company?

b. Please provide all locations within your service area that were included within your vegetation maintenance schedule over the past two years (2019-2020) and the first 2 months of 2021.

c. Please provide the locations in your service area that received the most scheduled vegetation maintenance within the two years (2019-2020) and the first 2 months of 2021.

d. Please provide the locations in your service area that received the least scheduled vegetation maintenance within the past two years (2019-2020) and the first 2 months of 2021.

e. Please provide the locations with the most distribution grid damage due to fallen or sagging trees or tree limbs during the Winter Storms.

    i. If possible, please explain how many customers lost power due to the vegetation damage in these locations?

Response 9:

<u>TRANSMISSION:</u>

The two vegetation related transmission outages during the winter storm were a result of trees falling from outside of the right-of-way. AEP Transmission Forestry does inspect for hazard trees (trees structurally unsound that could contact a transmission line) outside of the right-of-way, but

there is no practical inspection program or technology capable of identifying the failure of healthy trees.

a. The two vegetation related Transmission outages during the winter storm were a result of trees falling from outside of the right-of-way, rather than sagging or fallen limbs.

b. See "Winter Storm Question 9, Attachment 1"

c. See "Winter Storm Question 9, Attachment 1"

d. AEP Transmission Field Services conducts an annual aerial patrol inspection on all lines below 200kV and provides notes to Transmission Forestry. The Transmission Forester will use those notes during the development of the upcoming work plan along with a vegetation risk based ranking, budget, last maintenance, and other items to determine which lines to plan. This means that certain lines may not appear on a work plan for several years.

   The lines listed in "Winter Storm Question 9, Attachment 1" are the remaining lines in Louisiana that have not been addressed from 2019 – February 2021

e. The two vegetation related Transmission outages interrupted power to a total of 3278 customers.

<u>DISTRIBUTION</u>:

SWEPCO believes a 4-6 year vegetation management cycle would result in a significant reduction of vegetation caused outages caused by tees inside of the right of way. SWEPCO spends approximately $18 million annually in vegetation in the Louisiana jurisdiction, which results in a approximate 16 year cycle. Additionally, a comprehensive tree risk program, aimed to remove danger trees outside of the ROW would have a significant impact during major events such as ice storm, tornadoes, and hurricanes, which often cause large trees to break or uproot and fall inside of the ROW causing significant damage to the electrical system.

a. Please see the distribution response provided above. As stated above, a fully funded vegetation management trim cycle will allow the utility to remove and trim limbs on a frequent basis throughout the system therefore eliminating the potential for those limbs to contact the electrical lines.

b. SWEPCO serves 276 circuits in Louisiana. 75 circuits in the Valley district and 201 circuits in the Shreveport district. In 2019, SWEPCO performed end-to-end tree trimming activities on 9 circuits, 6 in the Shreveport district and 3 circuits in the Valley district. In 2020, SWEPCO moved from a circuit bid program to a targeted vegetation management process in order to address an increase the number of circuits affected by vegetation. Between January 1, 2019 and February 28, 2021, 239 circuits benefited from vegetation management activities. The breakdown consists of 68 circuits in the Valley district and 171 circuits in the Shreveport district.

c. Please see the response to 9b.

d. From a total of 276 circuits in Louisiana, 37 did not receive any vegetation management from 2019 through February, 2021.

e. During the 2021 ice storm event from February 9 to February 21, 181 circuits throughout SWEPCO, Louisiana were impacted by outages with a higher concentration of outages in the Valley district where greater ice accumulation was present on the vegetation, including the transmission-related outages above.

    i. During the 2021 ice storm event from February 9 to February 21, 70,309 customers were impacted by outages due to which includes the 3278 customers resulting from transmission-related outages.

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Question 10:

***Questions pertaining to the Distribution Grid*:**
How much of your total operating budget is dedicated to vegetation maintenance in Louisiana? Please provide both a percent of total budget and dollar amount.

Response 10:

SWEPCO's total Distribution O&M Budget for 2021 is $78,751,988 (All Jurisdictions).

SWEPCO's total Distribution Vegetation Management O&M Budget in Louisiana for 2021 is $15,240,848 or 19.4% of the total SWEPCO Distribution O&M Budget.

SWEPCO's total Transmission O&M Budget for 2021 is $25,057,379 (All Jurisdictions).

SWEPCO's total Transmission Vegetation Management O&M Budget in Louisiana for 2021 is $1,443,357or 5.8% of the total SWEPCO Transmission O&M Budget.

This represents O&M Vegetation Management spending in Louisiana only.

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Question 11:

***Questions pertaining to the Distribution Grid*:**
Please provide a narrative explanation of the "winterization" procedures and protocols utilized by the utility for each of its generating facilities and verification that those procedures and protocols were followed.

a. Please indicate whether there are any winterization procedures that were not performed on any of the utility's generating units for this winter season and why such procedures were not performed.

Response 11:

SWEPCO Fossil Generation Management requires each plant to maintain and follow a site-specific cold weather preparation plan, to help ensure reliable plant operation during subfreezing conditions. The plans are based on plant-specific criteria, such as location, age, and generating unit design characteristics. During cold weather operations, SWEPCO Fossil Generation Management monitors plant cold weather-related issues.

Additionally, cold weather preparedness reviews are used at each fossil generation facility. The plant-level review–is a continuous improvement tool that is used to help focus plant efforts on areas that will improve cold weather readiness. An integral part of this process is continual learning from both site-specific and fleet-wide experiences.

Cold weather planning at each fossil generation facility typically begins during the September-October time frame, with work management systems triggering detailed cold weather preparation activities. These activities include items such as checking heat trace, staging portable heat sources where needed, systems and equipment preparations, verification that auxiliary heating is functional, and personnel training. In November of each year, a designated representative from each plant is required to attest that their facility is winter ready.

a. All SWEPCO fossil generation facilities were deemed winter ready, in accordance with site-specific cold weather preparation plans.

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Question 12:

***Questions Pertaining to Rolling Blackouts*:**
Please describe the procedures used by the RTOs and by you to determine which load should be shed and for what duration.

Response 12:

SWEPCO follows the Southwest Power Pool (SPP) SPP BA Emergency Operating Plan V. 7.0 and the AEP West/SPP Emergency Operating Plan procedures when implementing load shed. Load shed is only implemented once all other alternatives have been exhausted. In the case of capacity deficiency under an EEA Level 3, SPP determines how much load each Transmission Operator in SPP's area is required to shed. This amount is determined on a pro rata basis based on the prior year's seasonal peak. SWEPCO maintains a detailed manual load shedding plan which it followed for the Extreme Cold Weather Event. The objective of the SWEPCO Load Shed Plan is to have no circuit intentionally open longer than two hours in order to minimize customer impact.

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Question 13:

***<u>Questions Pertaining to Rolling Blackouts</u>*:**
Did your utility undergo in any mandated or self-imposed rolling blackouts?

a. If you did execute rolling blackouts, how much time lead time did you receive from when you knew a blackout would occur to when the blackout took place for the end user? Please include a timeline of all notices received from MISO or SPP (as applicable) regarding the necessity to begin load shedding.

    i. In that time, were the effected customers notified in preparation?

    ii. Were the effected customers notified during or after the rolling blackout?

    iii. If effected customers were notified of a rolling blackout, what mode of communication was used?

    iv. If effected customers were notified before or during, were they given a timeline of how long the blackout would occur? Was that timeline accurate?

b. If the blackout was mandated, who made that decision and was a recommended time period given for how long the blackouts needed / should last?

c. If you did execute rolling blackouts, how long did the blackouts last? Please provide a shortest, longest, and average time of the rolling blackouts.

d. Please indicate the amount of industrial, commercial and/or residential load tripped off/shed during the Winter Storms, including the number of customers in each class and the number of MW by region and/or location.

e. If you did execute rolling blackouts, were you able to target those blackouts in order to:

    i. Lessen the impact on vulnerable customers, such as, but not limited to, those

needed electricity for health reasons or those customers who were just getting their power back after multiple days?

1. If not, is there something different that can be done in the future to potentially achieve this?

ii. Ensure the most power was conserved during a rolling black while potentially affecting the least customers? For instance, were you able to conserve energy by shutting off closed commercial customers and therefore spare shutting off residential customers trying to stay warm in their home?

1. If not, is there something different that can be done in the future to potentially achieve this?

Response 13:

During the period from February 9th through February 20th, SWEPCO received mandatory instruction from Southwest Power Pool (SPP) to shed load in three instances, associated with SPP's declaration of an EEA Level 3 during the Extreme Cold Weather Event. While SPP does not direct its Transmission Operators to implement rolling blackouts per se, SWEPCO does submit its Emergency Operations Plan to SPP for approval. The Emergency Operations Plan includes rolling blackouts based on the duration of the event to minimize customer impact.

a. SWEPCO received three instructions from SPP to shed firm load during the Extreme Cold Weather Event, one at 12:06 PM on February 15th, one at 6:46 AM on February 16th, and one at 7:18 AM on February 16th. Following the instruction on the 15th, SWEPCO began load shedding approximately six minutes after receiving the instruction (load shedding commenced at 12:12 PM). Following the instructions on the 16th, SWEPCO began load shedding approximately six minutes after receiving the first instruction (load shedding commenced at 6:52 AM), and approximately five minutes after receiving the second instruction (load shedding commenced at 7:23 AM).

i. SWEPCO issued an Emergency Appeal to Conserve Energy and two Mandatory Load Curtailment Initiation Announcements to the public. The Emergency Appeal informed the public that SWEPCO was experiencing an increased demand for electricity due to the extreme cold, and requested that SWEPCO customers reduce their electricity use. The Curtailment Initiation Announcements informed the public that some SWEPCO customers would experience an interruption in electric service on a rolling basis for no longer than a few hours, to the extent possible. The Emergency Appeal was issued by SWEPCO on February 14th at approximately 5:45 PM. The Curtailment Initiation Announcements for the Extreme Cold Weather Event were issued by SWEPCO at approximately 12:20 PM on February 15th, and again at 7:00 AM on February 16th.

Simultaneously, SPP issued general communications regarding the ongoing Extreme Cold Weather Event.

ii. SWEPCO issued notifications to the public during the rolling blackouts notifying them of the potential service interruption. SWEPCO also issued information statements to the public to keep customers apprised of continuing service interruptions due to weather conditions and to provide updates on restoration efforts, including estimated times of restoration.

iii. SWEPCO issued notifications to the public via the news media, on SWEPCO.com, and on SWEPCO's Facebook and Twitter pages. Simultaneously, SPP published notifications regarding the cold weather event on local news media outlets.

iv. Yes. SWEPCO issued notifications to the public that rolling blackouts would occur for a duration of up to a few hours, except in those circumstances where restoration within a few hours would not be possible. All customers, with the exception of approximately 13,500 (out of approximately 92,000), were restored within three hours. Those customers who were not restored within the three-hour period could not be restored due to circuit breaker failure to return to normal status caused by the extreme cold. However, these customers were restored as soon as the breaker issues could be resolved; none of the outages exceeded seven hours.

b. The blackout was mandated by SPP, including a mandatory time period for load shedding action. The first load shed instruction was issued by SPP on February 15th at 12:06 PM to shed firm load and at 1:01 PM to restore firm load. A second instruction was issued by SPP on February 16th at 6:46 AM to shed firm load and at 9:33 AM to restore firm load. A third instruction was issued by SPP on February 16th at 7:18 AM to shed firm load and at 10:08 AM to restore firm load. All load shed instructions provided by SPP are until further notice (i.e., until SWEPCO receives an instruction to restore load).

c. On February 15th, the first rolling blackouts began at 12:12 PM and the process to restore customers began at 1:06 PM.

On February 16th, rolling blackouts occurred in three phases. The first phase of rolling blackouts began at 6:52 AM and the process of restoring power to these customers began at 7:42 AM. The second phase of rolling blackouts began at 7:20 AM and restoration to these customers began at 8:55 AM. The third phase of rolling blackouts began at 7:42 AM and restoration to these customers began at 9:55 AM.

The shortest duration of rolling blackouts experienced by SWEPCO customers lasted for 50 minutes and the longest duration of rolling blackouts experienced by SWEPCO customers lasted for two hours 44 minutes. The average rolling blackout duration time per customer was one hour 31 minutes.

There were some customers who were not able to be restored during the rolling blackout time frame due to circuit breaker failure to return to normal status. See response to 13(a)

(iv) for additional details on those customers.

d. Total customer count effected by the load shed events on Feb 15th and 16th in Louisiana was 48,079 customers.

Residential = 43,628

Commercial = 3,998

Industrial = 453

e.

i. SWEPCO executed its rolling outages in a manner that minimized potential impact on vulnerable customers. SWEPCO makes every effort to avoid interrupting service to priority one customers such as hospitals, 9-1-1 call centers, and emergency responders. However, because of the way each circuit is structured, customer types cannot be separated and sometimes it is necessary to interrupt service to these customers. Similarly, SWEPCO did not interrupt service to customers who were just getting their power back after multiple days.

ii. SWEPCO followed its Manual Load Shed Plan that is on file with the Commission for the SWEPCO region during this Cold Weather event. Because of the way each circuit is structured, customer types cannot be separated and sometimes it is necessary to interrupt service to residential customers. As discussed previously, prior to shedding load, SWEPCO exhausted all other load reduction steps including issuing public appeals for load reduction.

1. Due to the way load shed is currently implemented based on circuit structure, it is not feasible to target customer types. However, as advanced meter technologies are deployed, it may be possible to implement load shed in a way that would distinguish between customer types in the future.

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Question 14:

***Questions Pertaining to Rolling Blackouts*:**
How many of your meters were turned off intentionally due to rolling blackouts versus lost power naturally due to storm damage from the Winter Storms?

Response 14:

SWEPCO did not turn off individual meters. Breakers on affected circuits were opened to drop the load as mandated by the Southwest Power Pool. On 2/15/21, - 23 MWs of load was shed to 5,230 customers. On 2/16/21, 213 MWs of load was shed to 42,849 customers.

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Question 15:

***Questions Pertaining to Rolling Blackouts*:**
Were any Load Modifying Resources ("LMRs"), including interruptible load, utilized during the Winter Storms?

a. If yes, please provide:

    i. The type of LMR;

    ii. The total number of MW of LMR; and

    iii. The duration of their use.

b. If no, please provide identify any interruptible customers who were not interrupted during the Winter Storm and provide a narrative as to why they were not interrupted. Included with this response, please also identify any interruptible load that did not fulfill its obligation to interrupt load when called.

Response 15:

a. Yes. During the period from February 9th through February 20th, prior to curtailing firm load under the EEA Level 3, SWEPCO curtailed interruptible load under the EEA Level 2.

    i. The type of LMR utilized in the Extreme Cold Weather Event was interruptible customer load from designated customers.

    ii. Approximately 29 MW of SWEPCO interruptible customer load was curtailed during the Extreme Cold Weather Event.

    iii. SWEPCO interruptible customer load was curtailed during the following times:

        - 8:05 AM on February 15th to 2:25 PM on February 15th (six hours, 20

minutes)

- 6:51 PM on February 15th to 12:07 AM on February 16th (five hours, 16 minutes)
- 3:21 AM on February 16th to 12:00 PM on February 16th (eight hours, 39 minutes)
- 6:33 PM on February 16th to 12:47 PM on February 17th (18 hours, 14 minutes)
- 6:20 PM on February 17th to 9:40 PM on February 17th (three hours, 20 minutes)

b. Only one SWEPCO interruptible customer was not interrupted during the Extreme Cold Weather Event. The customer has natural gas compression stations located in Longview, Texas. Due to the nature of the event and the need for natural gas supply, SWEPCO did not request the customer to curtail its load.

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Question 16:

***Questions Pertaining to Fuel and Generation Needs throughout the Winter Storms*:**
Please describe the impact of the Winter Storms on fuel costs and the expected impact on upcoming utility bills.

Response 16:

SWEPCO's estimated energy costs increased approximately $150 million on a Louisiana jurisdictional basis to be recovered over five-years. See 2021 Winter Storm Staff 1-16 Attachment 1 for the estimated impact to utility bills on a 5 year basis including a return at the LPSC FAC over/under rate as directed by the LPSC Executive Secretary. As a result, the April 2021 FAC secondary factor decreased as compared to the March 2021 FAC secondary factor. The final impact on customer bills, including the applicable carrying charge, will be reviewed in an upcoming docket.

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Question 17:

***Questions Pertaining to Fuel and Generation Needs throughout the Winter Storms*:**
Please describe any factors that limited the ability to import fuel to serve load and quantify the level of imports that were limited.

Response 17:

The primary factor that limited the delivery of natural gas was the lack of natural gas supply.

Based on SWEPCO's understanding, the cold temperatures experienced during the winter storm caused water and other liquids used in the natural gas production process to freeze in gathering lines or at the wellhead. This lack of natural gas supply, during a period of extreme demand, caused publicly reported natural gas prices to settle at record levels.

Furthermore, due to excessive pipeline system demand, the Enable Gas Transmission pipeline required customers to submit a Human Needs Affidavit or they would be forced offline. SWEPCO provided such affidavit, illustrating that natural gas received would be used for electricity generation for reliability within SPP, thus were not impacted by this operational order.

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Question 18:

***Questions Pertaining to Fuel and Generation Needs throughout the Winter Storms*:**
Please indicate whether there were any fuel suppliers who failed or refused to deliver the contracted quantities of fuel during the Winter Storms. If there were any failures or refusal of delivery, please indicate:

a. The name of the fuel supplier;

b. The amount of fuel that was not delivered;

c. The generating unit(s) to which fuel was not delivered;

d. The reason provided by the fuel counterparty for failure to deliver; and

e. Whether or not that generating unit had to cease or curtail operations as a result of the failure of the fuel supplier to deliver contracted-for quantities.

Response 18:

Please see LPSC Winter Storm Staff 1-18 CONFIDENTIAL Attachment 1 for the requested information.

LPSC Winter Storm Staff 1-18 CONFIDENTIAL Attachment 1 is being provided to the Commission and Staff pursuant to Commission Rule 12.1.

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Question 19:

***Questions Pertaining to Fuel and Generation Needs throughout the Winter Storms*:**
What are your suggestions on how to spread the fuel costs through the Fuel Adjustment Clause ("FAC") such that these costs are not incurred on a single bill?

Response 19:

Pursuant to Special Order 19-2021, SWEPCO collaborated with the Executive Secretary to determine the applicable recovery period and appropriate carrying costs to moderate the impact of the increased Energy Costs to SWEPCO's Louisiana customers. Final determination of the appropriate time period and carrying costs will be subject to a future proceeding.

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Question 20:

***Questions Pertaining to Fuel and Generation Needs throughout the Winter Storms*:**
What are your suggestions on other ways to share the risk of such effects to the FAC rather than flowing those costs through to customer bills?

Response 20:

SWEPCO is proposing to recover the costs of the winter storm pursuant to long-standing commission precedent related to the costs that may be recovered through the fuel adjustment clause. These FAC charges include the cost of fuel, purchased power, and SPP-related expenses.

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Question 21:

***Questions Pertaining to Fuel and Generation Needs throughout the Winter Storms*:**
How much did the price of fuel go up during the Winter Storms and for how long did it stay at those peak prices?

Response 21:

Natural gas prices during the winter storm were highly volatile, driven by high demand, which was coupled with limited supply.

SWEPCO purchases spot natural gas at market index pricing, at several market locations. For one such market index, Enable Gas East, prices were elevated, setting several historic price levels during the month of February. At the index's highest settlement price, which was more than $428 per MMBtu on February 18th, it was approximately $425 per MMBtu more than the February 10th and the February 20th settlement prices.

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Question 22:

***Questions Pertaining to Fuel and Generation Needs throughout the Winter Storms*:**
Ultimately, who bears the risk of Locational Marginal Pricing ("LMP") changes throughout MISO? Throughout SPP?

Response 22:

Within the SPP region, all Market Participants in some manner bear the risk of changes in the LMP. For SWEPCO, these revenues and costs attributable to the LMP are recorded as either purchase power expense or sales for resale revenue. These amounts are then recovered from SWEPCO's retail and wholesale customers

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Question 23:

***Questions Pertaining to Fuel and Generation Needs throughout the Winter Storms*:**
Could different measures have been taken in preparation for the Winter Storms in order to prevent fuel shortages? If so, why were those measures not taken?

a. Should these measures have been taken when the Winter Storms were forecasted in weather reports?

Response 23:

There were no additional measures that SWEPCO could have taken to ensure the timely delivery of natural gas. Natural gas supply was limited due to weather related problems in the production process.

a. Not applicable, as there were no additional measures that SWEPCO could have taken to ensure the timely delivery of natural gas.

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Question 24:

Questions pertaining to customer service and communication:
How many customers do you serve in the state of Louisiana?

Response 24:

SWEPCO serves approximately 265,600 customers in Louisiana.

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Question 25:

Questions pertaining to customer service and communication:
How many customer service representatives [2] do you have in Louisiana answering phone calls or making live calls to your customers? Please provide the job title and business address for each of these employees.

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[2] For the purposes of these questions, answering parties should understand that "customer representatives" refer to live, human-being employees of the utility (not a third-party contractor), who are trained to handle customer issues that may arise in the utility's duty to provide service to their customers.

Response 25:

The Shreveport call center is located at 6300 Line Avenue, Shreveport, LA 71106 and employed 109 employees in February 2021. Titles include: Customer Operations Associate, (COA), Sr. COA, Specialist, Lead, Supervisor, and Manager. In addition, AEP has 5 additional call centers with similar live call handling staff located in Tulsa, Oklahoma; Corpus Christi, Texas; Hurricane, West Virginia; Groveport, Ohio; and Ft Wayne, Indiana. SWEPCO also partners with 2 outsource call centers, Alorica and iQor to handle calls with live agents. Overall, SWEPCO had over 650 live agent resources handling calls throughout the storm across AEP's virtual call center network.

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Question 26:

Questions pertaining to customer service and communication:
Do you make live phone calls (non-recording) to communicate to your customers?

Response 26:

Most outbound calls to customers are made through IVR (Integrated Voice Response) technology where informative messages are left for customers or with a live agent on the call if the customer answers. On some occasions specific to a customer's individual situation a live call could be made by various SWEPCO employees typically related to a customer's service request, complaint, question or other need.

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Question 27:

Questions pertaining to customer service and communication:
Do you answer phones with live personnel or use pre-recorded messages to answer phone calls?

Response 27:

Both. SWEPCO primarily utilizes upfront informational announcements at the onset of an outage to let customers know we are aware of the outage, along with the opportunity to submit an outage report. This allows the Company to gather restoration times and mobilize staff in order to answer more calls with live agents if outage restoration is extended. However, agents are taking calls when announcements are played as well. In rare circumstances when SWEPCO experiences extremely high volume, such as the recent rolling black outs, announcements at the ATT network level are broadcast to prevent customers from receiving a busy signal and ensure they receive the message. The call volume was as much as ten times higher than normal some days during the recent weather event.

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Question 28:

Questions pertaining to customer service and communication:
Do you have a local (area code within your Louisiana service territory) customer service number, or do you utilize a 1-800 number?

a. Please explain the advantages or disadvantages of utilizing a local number over a 1-800 number or vice versa.

Response 28:

SWEPCO utilizes toll free 1-800 numbers only due to the flexibility in routing the calls as well as the amount of information available with each call. Calls can be identified from which area they are received which allows the company to play specific messages to customers about their outage and/or route them to the High Volume Call Answering partner where they can submit an outage report. SWEPCO connects local calls with an agent in the local call center first but if no one is available calls are routed to agents in one of the other AEP locations for quicker service rather than wait until a local agent becomes available. Using one number for outages and one number for customer service also makes it easier to provide more consistent communications with customers.

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Question 29:

Questions pertaining to customer service and communication:
Does your company have local, customer service offices or facilities within your Louisiana service area?

a. If so, please explain any perceived or realized advantages of such local facilities.

Response 29:

All customer service is handled over the phone by the local call center and virtual call center network. However, there are walk-in locations for customers to pay bills.

a. N/A

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Question 30:

Questions pertaining to customer service and communication:
On average, when a customer calls your customer service number, how long does it take for them to reach a live person who can answer their questions?

a. Will that live person always be in Louisiana?

b. Do customers have to press extension numbers to reach a live person?

Response 30:

SWEPCO's focus is answering each customer call as quickly and efficiently as possible. Sometimes that means a customer can be assisted quicker with automation such as the internal Interactive Voice Response Unit (IVR) or High Volume Call Answering service (HVCA). During the recent outages February 9th through the 20th the overall Average Speed of Answer for customers using all available channels was 65 seconds. The average wait time to speak with a live agent was 189 seconds.

a. SWEPCO routes the Louisiana calls to Louisiana agents first, but if a local agent is not available, calls are transferred to an available agent in one of the other centers. All agents have received the same training, the same outage information, and have the same system access. The virtual agents are crucial to SWEPCO's business continuity in situations like the recent weather event when travel conditions, water availability, and power availability were issues.

b. No

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Question 31:

Questions pertaining to customer service and communication:
Are your customer service representatives able to communicate directly to other departments of your utility operations in order to get helpful, accurate information efficiently for customers calling in?

Response 31:

Yes. Other internal departments proactively communicate with the call centers throughout the day as well as entering estimated times for restoration into the customer information system so agents can convey a consistent message to customers.

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Question 32:

Questions pertaining to customer service and communication:
Do you utilize text notifications to communicate with your customers? Did this service work during these past Winter Storms?

Response 32:

Yes, SWEPCO offers outage and billing alerts to customers who have enrolled in the service. Outage alerts are designed to provide the same information available to call center staff, or listed on a customer account thru SWEPCO.com and online outage mapping including a customer's outage status, estimated time of restoration, outage cause if available, power restored indicator with the ability to re-report power out if it is not restored. Customers generally find these alerts informative and proactive.

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Question 33:

Questions pertaining to customer service and communication:
Do you utilize automated phone calls to communicate with your customers?

Response 33:

Yes. SWEPCO uses automated phone calls to communicate planned outages to customers.

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Question 34:

Questions pertaining to customer service and communication:
Do you utilize email notifications to communicate with your customers?

Response 34:

Yes. Customers may enroll in email notifications for outages and billing alerts. SWEPCO also sends customers newsletters periodically.

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Question 35:

Questions pertaining to customer service and communication:
Do you have personnel dedicated to monitoring social media pages related to your company as well as social media pages in general and social media trends within your service territory in order to further understand any problems that may be arising for your customers and/or communicate directly with customers?

a. Do you answer questions your customers post on social media?

b. Do you find a social media presence is helpful in responding to your customers?

Response 35:

Yes. SWEPCO's Facebook, Instagram, Twitter, LinkedIn and YouTube accounts are monitored by SWEPCO employees as well as employees in the Social Media Center at American Electric Power, SWEPCO's parent company. The Social Media Center shares information about trends and has agents who respond to customer questions and concerns posted to our social media pages.

a. Yes.

b. Yes. Social media accounts allow customers to get information quickly from SWEPCO as well as individual help with their concerns and questions.

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Question 36:

Questions pertaining to customer service and communication:
Do you have an automated or advanced meter system?

a. If so, did it function/perform properly during the Winter Storms? Why or why not? Please support with examples and evidence.

Response 36:

Not at this time. SWEPCO is currently exploring the benefits of advanced meter systems and their applicability to the SWEPCO system.

a. N/A

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Question 37:

Questions pertaining to customer service and communication:
Does your utility utilize an online outage map accessible to customers?

a. Was that map accurate during the Winter Storms? Why or why not?

Response 37:

Yes. SWEPCO uses iFactor maps available at SWEPCO.com/outagemap to show customers outages. Outage information is updated every 15 minutes. The outage maps were accurate during the winter storms. The Distribution Dispatch Center entered two-hour estimated times of restoration (ETRs) for outages due to load shed. ETRs for the ice storm were added when they were available.

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Question 38:

Questions pertaining to customer service and communication:
Are your systems able to identify whether a customer has power or does not have power?

a. If yes, was this function working properly during the Winter Storms?

b. If yes, are you able to therefore communicate with customers who have power differently than customers who do have power?

c. At any point during the Winter Storms, did your company ask customers who did not have service to curtail their usage?

Response 38:

Yes, at a circuit level only. SWEPCO uses a SCADA system to monitor substations related outages (circuit breaker level).

a. Yes.

b. No.

c. SWEPCO asked all customers via mass media and social media to conserve energy before and during the load shed events.

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Question 39:

Questions pertaining to customer service and communication:
If your company realizes their customer service or communications systems are not working, what is your company's response to this issue? What mitigation measures are taken to address any malfunctions? What mitigation measures are taken to explain any deficiencies to your customers?

Response 39:

SWEPCO posts information on social media channels when customer service or communications systems are not working. SWEPCO also updates messages on its customer service toll-free numbers.

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Question 40:

Questions pertaining to customer service and communication:
Do you have a public relation, customer service, or other team in charge of crafting and sending out notifications and public outreach messages to your customers?

Response 40:

Yes. SWEPCO has a Corporate Communications team that develops and publishes notifications and news releases to customers, local, state and federal officials, media and other stakeholders. The information is posted on SWEPCO.com and the company's social media channels.

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Question 41:

Questions pertaining to customer service and communication:
Do you target messages based on relevancy to your customers or simply send general notifications across your entire service territory, regardless of its relevancy for each customer?

a. If the answer depends on a scenario, please expand on those different scenarios to provide a full understanding of how your teams attempt to best communicate with customers.

b. Does your company believe that targeted messages (or different forms of messaging) are more useful in ensuring accurate, relevant communication to customers? Why or why not?

c. What are barriers to communicating tailored, relevant information to each customer that would cause a company to rely only on general communications?

Response 41:

Yes. Targeted, relevant messages are more useful to SWEPCO customers than receiving all of the company's updates.

a. and b. Storm updates are most important to the SWEPCO customers who may be affected. SWEPCO's territory stretches from Hornbeck, Louisiana, to north of Fayetteville, Arkansas, and East Texas to east of Bossier Parish in Louisiana. It also encompasses parts of the Texas panhandle.

   Before and after the winter storm, SWEPCO targeted messages asking customers to prepare for the potential storms, provided safety information during and after the storm, and provided estimated restoration times based on customer location. During the load shed event, SWEPCO notified all customers via social media and news releases of the need to conserve energy and the implementation of rotating, controlled outages.

   SWEPCO also targets messages based on a customer's account status. For example, a

customer whose account is in arrears may receive an email explaining what payment arrangements are available. A commercial customer may receive information about energy efficiency programs SWEPCO offers to business customers.

c. SWEPCO has email addresses for approximately 50% of its customers, limiting the percentage of customers who may receive general or personalized email communications. SWEPCO's ability to text customers is limited to those who enroll in outage and billing alerts. The company is working on expanding its ability for two-way texting with customers.

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Question 42:

Questions pertaining to customer service and communication:
Were you able to get accurate information to your customers before, during and after the Winter Storms?

Response 42:

Yes. SWEPCO shared information via news releases, on the company's website, through social media channels and traditional media, and through advertising (radio, digital, social).

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Question 43:

Questions pertaining to customer service and communication:
What is your utility's total yearly operating budget?

Response 43:

SWEPCO's Operating & Maintenance budget for 2021 is $497,642,145.

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Question 44:

Questions pertaining to customer service and communication:
How much of your utility's total yearly operating budget is allocated to customer service? Please provide dollar number and percentage.

a. Please break down the dollars allocated to customer service based on categories your utility spends in, such as, but not limited to:

    i. How much money is spent on human customer service representatives?

    ii. How much money is spent on automated systems?

    iii. How much money is spent on physical customer service locations (places where the public can contact either physically or by telephone an individual dedicated to handling their customer service issue)?

Response 44:

SWEPCO's 2021 Operating & Maintenance budget allocated to customer service is $50,049,385. This represents 10.1% of the total yearly Operating & Maintenance budget. Attached is a breakdown of the categories within the customer service budget.

Category	2021 Budget
DSM Support	18,034,388
Internal Labor	17,095,800
Factoring	7,732,947
Customer Billing/Collections	2,014,210
AEPSC Billings	1,582,721

Call Center Overflow	1,305,182
Fleet	735,175
Outside Services	670,100
Material & Supplies	456,482
Travel & Entertainment	327,450
Other	94,930
Grand Total	**50,049,385**

Additionally, SWEPCO spent $537,000 on customer service related automated expenses in 2019. This the most recent information available,

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Question 45:

Questions pertaining to customer service and communication:
How much does it cost (rough estimate based on current employment) to hire and maintain one customer service representative?

Response 45:

The average salary to employ a Customer Operations Associate is $57,400. In situations such as the recent weather event it is more cost effective to have agents available in other locations to assist during emergencies than to maintain additional staff for such coverage.

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Question 46:

Questions pertaining to customer service and communication:
Do you feel your customer service and communication allowed for your customers to adequately prepare for events that unfolded during the Winter Storms?

Response 46:

Yes. SWEPCO published multiple news releases and posts on social media asking customers to prepare for the extremely cold weather and requesting that they conserve energy. SWEPCO also shared this information through digital, social media and radio advertising.

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Question 47:

Questions pertaining to customer service and communication:
Do you believe useful and helpful customer service was provided by your company to your customers during the Winter Storms?

Response 47:

Yes. SWEPCO shared information on public safety, ways to conserve energy and information about outages and estimated restoration times during the winter storms.

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Question 48:

Questions pertaining to customer service and communication:
Based on your company's customer service performance in the Winter Storms, does your company plan on increasing the amount of budget they allocate to customer service?

a. Will your company ask for a rate increase to do so?

Response 48:

SWEPCO continually evaluates budget and cost-effective means of customer communications. SWEPCO's Communication and Customer Services Teams use paid and earned media as well as email, social media, and digital communications to keep customers informed during storms. The company remains focused on finding relevant, effective ways to communicate with customers while delivering affordable, reliable service.

a. SWEPCO requests rate adjustments periodically depending on a multitude of factors, including changes to operating expenses

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Question 49:

***Closing Questions*:**
Please provide all temperature forecasts you received for your Louisiana service territory (and the source of those forecasts) for February 14-20, 2021 and the actual temperatures experienced on those dates.

Response 49:

Please see 2021 Winter Storm Staff 1-49 Attachment 1 and 2021 Winter Storm Staff 1-49 Attachment 2 for the requested forecasted and actual temperatures. Please see 2021 Winter Storm Staff 1-49 Attachment 3 and 2021 Winter Storm Staff 1-49 Attachment 4 for the long range forecasts and company circulated weather alerts, respectively.

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Question 50:

***Closing Questions*:**
In your opinion, was your utility adequately prepared for the Winter Storms?

a. Did you customers benefit from your level of preparedness?

Response 50:

Yes, SWEPCO was well-prepared for the winter storm, bringing in over 1,000 utility and contract employees to ensure the safe and reliable operation and restoration of the T&D system during record-breaking cold temperatures. SWEPCO believes its customers benefited from that preparedness in that customers did not have extended outages due to snow and ice causing issues with its system. Additionally, SPP which ensures reliable operation of the grid, including generation, issued reliability, must-run directions during the severe weather event that SWEPCO and other market participants to run generators in order to avoid a system-wide failure of the electric grid. SWEPCO was able to fulfill the SPP requests to help mitigate issues at the RTO level.

BEFORE THE

LOUISIANA PUBLIC SERVICE COMMISSION

IN RE: FOLLOW UP QUESTIONS TO
ELECTRIC UTILITIES ON WINTER
STORM EVENT

SOUTHWESTERN ELECTRIC POWER COMPANY'S REPONSES TO
STAFF'S 1ST REQUEST FOR INFORMATION

Question 51:

***Closing Questions*:**
In your opinion, was your response to the Winter Storms sufficient or to a standard of excellence your customers deserve?

Response 51:

Yes. SWEPCO worked diligently to meet the unprecedented challenges presented by this historic Winter Storm Event in order to provide service to its customers.