

BEFORE THE  
LOUISIANA PUBLIC SERVICE COMMISSION

IN RE: APPLICATION OF SOUTHWESTERN  
ELECTRIC POWER COMPANY FOR: (I)  
RECOVERY OF CERTAIN STORM DAMAGE  
COSTS INCURRED AS A RESULT OF HURRICANES  
LAURA AND DELTA; (II) RECOVERY OF  
CERTAIN STORM RESTORATION COSTS ASSOCIATED  
WITH THE FEBRUARY 2021 WINTER STORM EVENT  
AND (III) EXPEDITED TREATMENT

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

DIRECT TESTIMONY OF  
  
J. DAVID SPRING  
  
FOR  
  
SOUTHWESTERN ELECTRIC POWER COMPANY

OCTOBER 2021

## TESTIMONY INDEX

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## EXHIBITS

<u>EXHIBIT</u>	<u>DESCRIPTION</u>
EXHIBIT JDS-1	STORM COSTS AND CARRYING CHARGES
EXHIBIT JDS-2	REGULATORY ASSET AND ACCUMULATED CARRYING CHARGES

1 I. INTRODUCTION

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

4 A. My name is J. David Spring and I am a Regulatory Accounting Case Manager for  
5 American Electric Power Service Corporation (AEPSC), a subsidiary of American  
6 Electric Power Company, Inc. (AEP). My business address is 212 E. 6<sup>th</sup> Street, Tulsa,  
7 Oklahoma 74119-1295.

8 Q. PLEASE PROVIDE A REVIEW OF YOUR EDUCATIONAL BACKGROUND.

9 A. I graduated from Langston University with a Bachelor in Business Administration in  
10 Accounting. I am a licensed CPA in the state of Oklahoma, since 1993.

11 Q. PLEASE DESCRIBE YOUR PROFESSIONAL EXPERIENCE.

12 A. In 1994, I accepted a position with Transok, Inc., a subsidiary of Central and Southwest  
13 Corporation (CSW) as a Tax Accountant. My job duties in this capacity were to file  
14 all federal income tax returns and approximately thirty state income and franchise tax  
15 returns. In 2000, CSW merged with AEP. Since that time, I have held various  
16 regulatory tax related positions, until June of 2018. In June 2018, I transferred to the  
17 Regulatory Accounting Services department to my current position as Regulatory  
18 Accounting Case Manager.

19 As a Regulatory Accounting Case Manager, I am responsible for assisting the  
20 Director of Regulatory Accounting Services in providing accounting support for  
21 regulatory filings before the various regulatory commissions exercising jurisdiction  
22 over the western portion of AEP, including AEP Texas Inc., Public Service Company  
23 of Oklahoma, Electric Transmission Texas and Southwestern Electric Power Company

1 (SWEPCO or the Company). In addition, I am responsible for the presentation of  
2 written and oral testimony before these commissions.

3 Q. HAVE YOU PREVIOUSLY FILED TESTIMONY?

4 A. Yes, I have filed testimony before the Public Utility Commission of Texas on behalf of  
5 SWEPCO in Docket Nos. 39205, 46449 and 52389 and on behalf of AEP Texas in  
6 Docket Nos. 50733 and 51984. I have also filed testimony before the Arkansas Public  
7 Service Commission on behalf of SWEPCO in Docket No. 09-008-U.

8 Q. ON WHOSE BEHALF ARE YOU PROVIDING THIS TESTIMONY?

9 A. I am providing this testimony on behalf of SWEPCO.

10

11

## II. PURPOSE OF TESTIMONY

12 Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

13 A. My testimony supports SWEPCO's recovery of certain extraordinary storm  
14 restoration costs that the Company incurred in the summer and fall of 2020 during the  
15 aftermath of Hurricanes Laura and Delta, (the Hurricanes), and the unprecedented  
16 February 2021 Winter Storm Event (Winter Event) that caused SWEPCO to incur  
17 significant storm restoration costs (collectively the Storms). Specifically, I support the  
18 calculation of interim carrying charges associated with distribution operations and  
19 maintenance (O&M) expenses that SWEPCO incurred to restore electric service in the  
20 Company's service territory following the Storms up to and until SWEPCO is able to  
21 recover the associated O&M expenses. Additionally, SWEPCO is requesting a  
22 carrying charge at its pre-tax weighted average cost of capital (WACC) from its original  
23 deferral of costs in September 2020 (based on August 2020 amounts). SWEPCO is

1 requesting to collect the carrying charges on the regulatory asset balance (with  
2 accumulated carrying charges) at December 31, 2021 through a Rider subject to  
3 reconciliation with the prudence findings effective with SWEPCO's first billing cycle  
4 of January 2022. Finally, SWEPCO is also requesting approval to continue to maintain  
5 as a Regulatory Asset, the balances of the distribution O&M expenses (with  
6 accumulated carrying charges at December 31, 2021) that the Company incurred to  
7 restore service related to the Storms at their full balances, without any amortization,  
8 until it is determined in Phase II of this proceeding whether securitization or another  
9 recovery mechanism is approved by the Commission and fully implemented. I  
10 specifically discuss the calculation of the Storm O&M expenses that were incurred by  
11 SWEPCO during restoration and recorded as a separate regulatory asset, pursuant to  
12 the Louisiana Public Service Commission's (LPSC or Commission) orders.  
13 Additionally, I discuss SWEPCO's calculation of the carrying costs for the expenses  
14 that were deferred up to and until SWEPCO is able to recover these expenses in the  
15 future as part of Phase II of this proceeding. SWEPCO is also seeking a prudence  
16 determination of these costs so it may more easily transition to recovery in Phase II,  
17 without the need for additional cost review by the Commission. This prudence request  
18 is discussed more fully in the testimony of SWEPCO witness Thomas P. Brice.

1                    III. SUMMARY OF SWEPCO'S STORM RESTORATION COSTS SWEPCO  
2                    SEEKS TO MAINTAIN IN ITS REGULATORY ASSET  
3                    AND ULTIMATELY RECOVER

4    Q.    HAS SWEPCO PREVIOUSLY SOUGHT RECOVERY OF THE STORM  
5           RESTORATION COSTS ASSOCIATED WITH HURRICANES LAURA AND  
6           DELTA?

7           Yes. SWEPCO previously submitted a request for cost recovery related to the  
8           Hurricanes in its December 21, 2020 filing in its pending rate case *In Re: Application*  
9           *for Approval of a Change in Rates, Extension of Formula Rate Plan and Other Related*  
10          *Relief*, pending in Docket No. U-35441. SWEPCO's request included testimony from  
11          SWEPCO witnesses Brice and Ms. Tiffany A. Day. In March 2021, at Staff's request,  
12          Staff and SWEPCO discussed removing the hurricane cost recovery and issues from  
13          the rate case proceeding. On March 26, 2021, Staff and SWEPCO filed a joint motion  
14          to remove the storm cost issues from the rate case proceeding, with SWEPCO reserving  
15          rights to seek recovery of the costs associated with the Storms in this separate  
16          proceeding.

17   Q.    WERE THE STORM RESTORATION COSTS RESULTING FROM THE WINTER  
18           EVENT DEFERRED AS A REGULATORY ASSET?

19   A.    Yes, SWEPCO deferred the expenses into a regulatory asset, as authorized by the LPSC  
20           pursuant to its action taken at the March 17, 2021, B&E Session, and authorized in  
21           Special Order 21-2021 as discussed by SWEPCO witness Brice.

22   Q.    WOULD YOU PLEASE SUMMARIZE THE STORM O&M EXPENSES THAT  
23           OCCURRED TO RESTORE SERVICE THAT SWEPCO SEEKS TO MAINTAIN IN  
24           ITS REGULATORY ASSET UNTIL IT IS ABLE TO RECOVER THE EXPENSES?

1 A. Yes. Exhibit JDS-1 presents the O&M Storm restoration expenses that SWEPCO  
2 incurred during the restoration of service for Louisiana customers after the Storms. In  
3 total, SWEPCO incurred \$151.9 million in O&M expenses as part of its restoration  
4 efforts. Figure 1 summarizes the O&M expenses, by each category that SWEPCO  
5 incurred for restoration of electric service subsequent to the Hurricanes and Winter  
6 Event as of September 30, 2021:

Figure 1 - Louisiana Major Storm Restoration				
Distribution Related O&M Costs				
Through September 30, 2021				
	Hurricane Delta	Hurricane Laura	Winter Storm 2021 (Uri)	Grand Total
Cost Category	Distribution O&M	Distribution O&M	Distribution O&M	Distribution O&M
Fleet Services	\$ 647,928	\$ 1,403,127	\$ 324,035	\$ 2,375,090
Fringes	\$ 195,656	\$ 542,891	\$ 15,631	\$ 754,178
Incentives	\$ 252,136	\$ 1,102,980	\$ 122,639	\$ 1,477,755
Internal Labor	\$ 1,878,713	\$ 5,282,301	\$ 1,132,244	\$ 8,293,258
Material & Supplies	\$ 1,740	\$ 89,365	\$ 700,667	\$ 791,773
Other Clearings/Billings	\$ 25,814	\$ 207,004	\$ 54,139	\$ 286,957
Other Cost Category	\$ 3,135,759	\$ 23,586,105	\$ 80,247	\$ 26,802,110
Outside Services	\$ 11,250,616	\$ 56,028,490	\$ 42,970,231	\$ 110,249,337
Travel Expenses	\$ 257,378	\$ 670,423	\$ 36,789	\$ 964,590
Total	\$ 17,645,741	\$ 88,912,685	\$ 45,436,623	\$ 151,995,049

7 Q. WOULD YOU PLEASE DESCRIBE THE DATA IN THE ABOVE TABLE?

8 A. These are distribution-related O&M expenses for projects to repair and/or replace  
9 utility infrastructure damaged or destroyed by the Storms. Company witness Mr. Drew  
10 W. Seidel further discusses these restoration projects in his testimony.

11 Q. THE AMOUNTS FOR HURRICANES LAURA AND DELTA DIFFER FROM THE  
12 REQUEST IN DOCKET NO. U-35441. WHY IS THAT?

13 A. The amounts in the original filing were based upon estimates at that time; however,  
14 capital and O&M allocations are not finalized until the accounting analysis occurs after

1 closing of the project. Therefore, charges were still being updated when the request  
2 was previously submitted.

3 Q. ARE THE STORM COSTS FINAL?

4 A. No. These amounts are subject to true-up and prudence review and, with adjustments,  
5 if appropriate. The final accounting analyses for the hurricanes are in process and may  
6 create some additional charges, and the winter storm event should be closing shortly.

7 Q. IS SWEPCO ALSO REQUESTING A CARRYING CHARGE ON THE EXPENSES  
8 MAINTAINED IN THE REGULATORY ASSET BEFORE IT IS ABLE TO OBTAIN  
9 RECOVERY OF THE COSTS OR INTERIM RECOVERY OF THE CARRYING  
10 CHARGES?

11 A. Yes. SWEPCO is requesting a carrying charge at its existing pre-tax WACC, as  
12 approved in its 2017 Formula Rate Plan (FRP) in Docket No. U-34806-D at 8.665%.  
13 SWEPCO also recommends that the WACC ultimately approved in Docket No.  
14 U-35441 will replace the existing 8.665% WACC when those rates become effective.  
15 SWEPCO anticipates that it will take up to two years to complete the regulatory process  
16 to determine the final recovery mechanism for these costs. SWEPCO incurred the  
17 Hurricane-related costs in the summer of 2020 and requested recovery of the costs in  
18 December 2020. As discussed in more detail in the testimony of SWEPCO witness  
19 Brice, given the potential for these expenses to not be authorized for recovery until  
20 2023, SWEPCO is requesting that it be allowed to recover the financing costs on the  
21 regulatory asset and accumulated carrying charges as the parties work through the  
22 recovery process.



1 Q. IS SWEPCO REQUESTING INTERIM RECOVERY OF THE CARRYING  
2 CHARGES EFFECTIVE IN JANUARY 2022?

3 A. Yes, SWEPCO is requesting that the carrying charges on the regulatory asset, including  
4 accumulated carrying charges (\$166.1 million Exhibit JDS-2) as of  
5 December 31, 2021, be collected through a rider effective the first billing cycle of  
6 January 2022, subject to reconciliation by the Commission on an annual basis. This  
7 interim recovery will allow SWEPCO to recover its financing costs caused by the  
8 Storms while the final recovery mechanism is determined through Phase II of this  
9 filing.

10 Q. WHAT IS THE TOTAL AMOUNT OF CARRYING CHARGES SWEPCO  
11 ESTIMATES TO COLLECT ANNUALLY THROUGH INTERIM RATES FOR THE  
12 EXPENSES IN THE REGULATORY ASSET?

13 A. The total carrying charges requested through interim rates at SWEPCO's 8.665%  
14 WACC is forecasted to be \$ 14.3 million annually as of December 31, 2021. This  
15 calculation is based upon the O&M deferrals (regulatory asset) from August 2020 to  
16 September 2021 and the accumulated carrying charges through December 31, 2021.  
17 Without the recovery of carrying charges starting in January 2022, through interim rates  
18 as requested, the accumulated carrying charges would be \$39.8 million by August of  
19 2023. SWEPCO is proposing that the actual carrying charges be based on the final  
20 audited storm restoration costs approved for recovery by the Commission starting with  
21 the actual date of recovery.

1 Q. WHY IS SWEPCO REQUESTING TO RECOVER ITS FINANCING COSTS ON  
2 ITS EXPENSES MAINTAINED IN THE REGULATORY ASSET?

3 A. As discussed in more detail in the testimony of SWEPCO witness Brice, SWEPCO  
4 believes these costs were extraordinary and providing recovery of at the Company's  
5 pre-tax WACC on an interim basis is consistent with prior Commission practice. The  
6 total amount of deferrals SWEPCO currently has on the books for storm restoration  
7 expenses is over \$151.9 million. The impact of any one of the Hurricanes, in and of  
8 itself, would be significant; however, the impact of the Storms is unprecedented for  
9 SWEPCO. Given the high amount of deferrals, SWEPCO's financial metrics will be  
10 adversely affected, and thus likely impose significant constraints upon operations as  
11 well as capital projects, as explained in more detail in SWEPCO's application and the  
12 testimony of witness Brice.

13

14 IV. CONCLUSION

15 Q. WOULD YOU PLEASE SUMMARIZE SWEPCO'S ACCOUNTING FOR THE  
16 STORM COSTS THAT SWEPCO SEEKS APPROVAL TO MAINTAIN IN THE  
17 REGULATORY ASSET AND ULTIMATELY RECOVER?

18 A. Yes. During the Storms, SWEPCO properly accounted for the O&M distribution  
19 related expenses and created a separate regulatory asset account, pursuant to the orders  
20 issued by the Commission. SWEPCO is seeking approval from the Commission to  
21 maintain these expenses and the accumulated carrying charges at December 31, 2021  
22 in the regulatory asset until it is able to recover these costs. SWEPCO has requested  
23 collecting through interim rates the carrying charges only applicable to the Storms

1 regulatory asset and accumulated carrying charges balance at December 31, 2021.  
2 Additionally, SWEPCO is seeking recovery of carrying costs at its current authorized  
3 pre-tax WACC until it is able to recover these costs, as well as a prudence finding from  
4 the LPSC.

5 Q. DOES THIS CONCLUDE YOUR SUPPORTING TESTIMONY?

6 A. Yes, it does.

Southwestern Electric Power Company  
Storms Regulatory Asset, ADFIT and Carrying Charges

	Storms Regulatory Asset	ADFIT DTL	Offsetting ADFIT NOL DTA	Regulatory Asset Subject to Recovery	Monthly Carrying Charge Calculation Carrying Charges at WACC	Accumulated Carrying Charges	Regulatory Asset Balance Including Carrying Charges
August-20	17,206,601	(3,613,386)	3,613,386	17,206,601	124,252	124,252	17,206,601
September-20	47,451,150	(9,964,741)	9,964,741	47,451,150	467,802	592,054	64,782,003
October-20	18,933,105	(3,975,952)	3,975,952	18,933,105	607,900	1,199,954	84,182,911
November-20	(1,248,606)	262,207	(262,207)	(1,248,606)	603,273	1,803,227	83,542,205
December-20	13,714,174	(2,879,976)	2,879,976	13,714,174	706,662	2,509,889	97,859,651
January-21	(2,353,136)	494,159	(494,159)	(2,353,136)	694,772	3,204,661	96,213,177
February-21	42,096,271	(8,840,217)	8,840,217	42,096,271	1,003,774	4,208,435	139,004,220
March-21	(94,458)	19,836	(19,836)	(94,458)	1,010,340	5,218,776	139,913,536
April-21	2,116,932	(444,556)	444,556	2,116,932	1,032,923	6,251,699	143,040,809
May-21	4,041,085	(848,628)	848,628	4,041,085	1,069,563	7,321,262	148,114,817
June-21	(994,786)	208,905	(208,905)	(994,786)	1,070,103	8,391,365	148,189,594
July-21	128,413	(26,967)	26,967	128,413	1,078,758	9,470,123	149,388,110
August-21	1,214,162	(254,974)	254,974	1,214,162	1,095,316	10,565,439	151,681,031
September-21	9,784,141	(2,054,670)	2,054,670	9,784,141	10,565,439		162,560,488
	151,995,049	(31,918,960)	31,918,960	151,995,049			
October-21					1,173,878	11,739,317	163,734,366
November-21					1,182,355	12,921,672	164,916,721
December-21					1,190,893	14,112,565	166,107,613
January-22					1,199,492	15,312,057	167,307,106
February-22					1,208,154	16,520,212	168,515,260
March-22					1,216,879	17,737,090	169,732,139
April-22					1,225,666	18,962,756	170,957,805
May-22					1,234,517	20,197,272	172,192,321
June-22					1,243,431	21,440,704	173,435,752
July-22					1,252,410	22,693,114	174,688,163
August-22					1,261,454	23,954,568	175,949,617
September-22					1,270,563	25,225,131	177,220,180
October-22					1,279,738	26,504,870	178,499,918
November-22					1,288,980	27,793,849	179,788,898
December-22					1,298,287	29,092,137	181,087,185
January-23					1,307,663	30,399,799	182,394,848
February-23					1,317,105	31,716,905	183,711,954
March-23					1,326,617	33,043,521	185,038,570
April-23					1,336,196	34,379,718	186,374,766
May-23					1,345,845	35,725,563	187,720,612
June-23					1,355,564	37,081,127	189,076,175
July-23					1,365,353	38,446,479	190,441,528
August-23					1,375,212	39,821,691	191,816,740
					8.665413%		

WACC per Docket No. U-32220 2017 FRP

Southwestern Electric Power Company  
Storms Regulatory Asset, ADFIT and Carrying Charges

	Storms Regulatory Asset	ADFIT DTL	ADFIT NOL DTA	Regulatory Asset Subject to Recovery	Monthly Carrying Charge Calculation Carrying Charges at WACC	Regulatory Asset Balance Including Carrying Charges	Monthly Interim Recovery
August-20	17,206,601	(3,613,386)	3,613,386	17,206,601		17,206,601	
September-20	47,451,150	(9,964,741)	9,964,741	47,451,150	124,252	64,782,003	
October-20	18,933,105	(3,975,952)	3,975,952	18,933,105	467,802	84,182,911	1,199,492
November-20	(1,248,606)	262,207	(262,207)	(1,248,606)	607,900	83,542,205	1,199,492
December-20	13,714,174	(2,879,976)	2,879,976	13,714,174	603,273	97,859,651	1,199,492
January-21	(2,353,136)	494,159	(494,159)	(2,353,136)	706,662	96,213,177	1,199,492
February-21	42,096,271	(8,840,217)	8,840,217	42,096,271	694,772	139,004,220	1,199,492
March-21	(94,458)	19,836	(19,836)	(94,458)	1,003,774	139,913,536	1,199,492
April-21	2,116,932	(444,556)	444,556	2,116,932	1,010,340	143,040,809	1,199,492
May-21	4,041,085	(848,628)	848,628	4,041,085	1,032,923	148,114,817	1,199,492
June-21	(994,786)	208,905	(208,905)	(994,786)	1,069,563	148,189,594	1,199,492
July-21	128,413	(26,967)	26,967	128,413	1,070,103	149,388,110	1,199,492
August-21	1,214,162	(254,974)	254,974	1,214,162	1,078,758	151,681,031	1,199,492
September-21	9,784,141	(2,054,670)	2,054,670	9,784,141	1,095,316	162,560,488	1,199,492
	151,995,049	(31,918,960)	31,918,960	151,995,049	10,565,439		
October-21					1,173,878	163,734,366	1,199,492
November-21					1,182,355	164,916,721	1,199,492
December-21					1,190,893	166,107,613	1,199,492
January-22						166,107,613	1,199,492
February-22						166,107,613	1,199,492
March-22						166,107,613	1,199,492
April-22						166,107,613	1,199,492
May-22						166,107,613	1,199,492
June-22						166,107,613	1,199,492
July-22						166,107,613	1,199,492
August-22						166,107,613	1,199,492
September-22						166,107,613	1,199,492
October-22						166,107,613	1,199,492
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December-22						166,107,613	1,199,492
January-23						166,107,613	1,199,492
February-23						166,107,613	1,199,492
March-23						166,107,613	1,199,492
April-23						166,107,613	1,199,492
May-23						166,107,613	1,199,492
June-23						166,107,613	1,199,492
July-23						166,107,613	1,199,492
August-23						166,107,613	1,199,492

01/01/2022 interim recovery of annual carrying charges at 8.665413% (2017 FRP Docket No. U-32220)  
until such time that new rates are set in Docket No U-35441.

Southwestern Electric Power Company  
Storms Regulatory Asset, ADFIT and Carrying Charges

	Storms Regulatory Asset	ADFIT DTL	Offsetting ADFIT NOL DTA	Regulatory Asset Subject to Recovery	Monthly Carrying Charge Calculation Carrying Charges at WACC	Accumulated Carrying Charges	Regulatory Asset Balance Including Carrying Charges
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September-20	47,451,150	(9,964,741)	9,964,741	47,451,150	467,802	592,054	64,782,003
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May-21	4,041,085	(848,628)	848,628	4,041,085	1,069,563	7,321,262	148,114,817
June-21	(994,786)	208,905	(208,905)	(994,786)	1,070,103	8,391,365	148,189,594
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	151,995,049	(31,918,960)	31,918,960	151,995,049			
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March-22					1,216,879	17,737,090	169,732,139
April-22					1,225,666	18,962,756	170,957,805
May-22					1,234,517	20,197,272	172,192,321
June-22					1,243,431	21,440,704	173,435,752
July-22					1,252,410	22,693,114	174,688,163
August-22					1,261,454	23,954,568	175,949,617
September-22					1,270,563	25,225,131	177,220,180
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November-22					1,288,980	27,793,849	179,788,898
December-22					1,298,287	29,092,137	181,087,185
January-23					1,307,663	30,399,799	182,394,848
February-23					1,317,105	31,716,905	183,711,954
March-23					1,326,617	33,043,521	185,038,570
April-23					1,336,196	34,379,718	186,374,766
May-23					1,345,845	35,725,563	187,720,612
June-23					1,355,564	37,081,127	189,076,175
July-23					1,365,353	38,446,479	190,441,528
August-23					1,375,212	39,821,691	191,816,740

WACC per Docket No. U-32220 2017 FRP

8.665413%

Southwestern Electric Power Company  
Storms Regulatory Asset, ADFIT and Carrying Charges

	Storms Regulatory Asset	ADFIT DTL	ADFIT NOL DTA	Offsetting	Regulatory Asset Subject to Recovery	Monthly Carrying Charges at WACC	Regulatory Asset Balance Including Carrying Charges	Monthly Interim Recovery
August-20	17,206,601	(3,613,386)	3,613,386		17,206,601		17,206,601	
September-20	47,451,150	(9,964,741)	9,964,741		47,451,150	124,252	64,782,003	
October-20	18,933,105	(3,975,952)	3,975,952		18,933,105	467,802	84,182,911	
November-20	(1,248,606)	262,207	(262,207)		(1,248,606)	607,900	83,542,205	
December-20	13,714,174	(2,879,976)	2,879,976		13,714,174	603,273	97,859,651	
January-21	(2,353,136)	494,159	(494,159)		(2,353,136)	706,662	96,213,177	
February-21	42,096,271	(8,840,217)	8,840,217		42,096,271	694,772	139,004,220	
March-21	(94,458)	19,836	(19,836)		(94,458)	1,003,774	139,913,536	
April-21	2,116,932	(444,556)	444,556		2,116,932	1,010,340	143,040,809	
May-21	4,041,085	(848,628)	848,628		4,041,085	1,032,923	148,114,817	
June-21	(994,786)	208,905	(208,905)		(994,786)	1,069,563	148,189,594	
July-21	128,413	(26,967)	26,967		128,413	1,070,103	149,388,110	
August-21	1,214,162	(254,974)	254,974		1,214,162	1,078,758	151,681,031	
September-21	9,784,141	(2,054,670)	2,054,670		9,784,141	1,095,316	162,560,488	
	151,995,049	(31,918,960)	31,918,960		151,995,049	10,565,439		
October-21						1,173,878	163,734,366	1,199,492
November-21						1,182,355	164,916,721	1,199,492
December-21						1,190,893	166,107,613	1,199,492
January-22							166,107,613	1,199,492
February-22							166,107,613	1,199,492
March-22							166,107,613	1,199,492
April-22							166,107,613	1,199,492
May-22							166,107,613	1,199,492
June-22							166,107,613	1,199,492
July-22							166,107,613	1,199,492
August-22							166,107,613	1,199,492
September-22							166,107,613	1,199,492
October-22							166,107,613	1,199,492
November-22							166,107,613	1,199,492
December-22							166,107,613	1,199,492
January-23							166,107,613	1,199,492
February-23							166,107,613	1,199,492
March-23							166,107,613	1,199,492
April-23							166,107,613	1,199,492
May-23							166,107,613	1,199,492
June-23							166,107,613	1,199,492
July-23							166,107,613	1,199,492
August-23							166,107,613	1,199,492

01/01/2022 interim recovery of annual carrying charges at 8.665413% (2017 FRP Docket No. U-32220) until such time that new rates are set in Docket No U-35441.