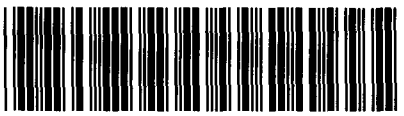

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REPORT FOR ELECTRIC UTILITY INFRASTRUCTURE IMPROVEMENT AND MAINTENANCE REQUIRED BY 16 TAC § 25.94	§ § § §	**PUBLIC UTILITY COMMISSION OF TEXAS**

SOUTHWESTERN ELECTRIC POWER COMPANY'S REPORT ON INFRASTRUCTURE IMPROVEMENT AND MAINTENANCE REQUIRED BY 16 TEX. ADMIN. CODE § 25.94

NOW COMES Southwestern Electric Power Company (SWEPCO), an American Electric Power (AEP) operating company providing bundled electric service in the state jurisdictions of Texas, Arkansas, and Louisiana within the Southwest Power Pool (SPP), and files the attached Report on Infrastructure Improvement and Maintenance pursuant to 16 Tex. Admin. Code § 25.94 (TAC).

Dated: May 1, 2019

Respectfully submitted,

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SOUTHWESTERN ELECTRIC POWER COMPANY'S REPORT ON INFRASTRUCTURE IMPROVEMENT AND MAINTENANCE REQUIRED BY 16 TEX. ADMIN. CODE § 25.94

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May 1, 2019

I. INTRODUCTION

Southwestern Electric Power Company (SWEPCO or the Company) is a bundled electric utility providing transmission and distribution service to customers in its service area within the Southwest Power Pool (SPP). 16 TAC § 25.94 of the Commission's substantive rules requires utilities to submit through a report information concerning the utility's identified service areas susceptible to damage during severe weather and transmission and distribution infrastructure hardening in those areas, and vegetation management and distribution pole inspection activities. As a utility subject to the reporting requirements of 16 TAC § 25.94, SWEPCO will address in this Report each of the categories of information requested in 16 TAC § 25.94. The Report highlights and explains the differing and unique characteristics that affect the manner in which SWEPCO executes its delivery of electric services to customers in its service areas. The geography of the areas that SWEPCO serves is diverse and varies from the northeast piney woods region to the panhandle prairie region. The areas are prone to a variety of weather conditions that can have severe impacts on the SWEPCO transmission and distribution system.

As addressed in this Report, through the centralized support of the AEP Service Corporation (AEPSC) organization and SWEPCO operating company personnel, the companies plan and design the transmission and distribution systems in a manner to sustain them against severe weather conditions. Additionally, these organizations operate and maintain the transmission and distribution systems and rights of way (ROWs) in a manner that seeks to ensure the continuation of delivery of safe and reliable services to their customers, which includes effective vegetation management and distribution pole inspection programs.

II. SWEPCO'S REPORT

A. SWEPCO Areas Susceptible to Damage During Severe Weather

SWEPCO provides transmission and distribution service to customers in the northeast and lower Panhandle areas of Texas. SWEPCO serves all or part of 19 counties in northeast Texas bordering Oklahoma, Arkansas, and Louisiana. This area is characterized by rolling hills, heavy timber with tall pines and hardwood, heavy vegetation, lakes, rivers, and streams. In contrast, the 5 counties in the Panhandle region SWEPCO serves is generally cattle-raising and farming communities with far less vegetation as characterized by the plains in west Texas.

Although the geographic regions SWEPCO serves may differ, both areas are susceptible to severe weather. All of the areas that SWEPCO services are prone to ice, snow, and wind storms, including tornadic storms. Such storm activity is capable of causing significant damage to the SWEPCO transmission and distribution systems. Accordingly, SWEPCO identifies the entirety of its transmission and distribution service territories as susceptible to damage during severe weather and major storms. In northeast Texas, SWEPCO's service territory has at times been impacted by hurricanes and tropical storms such as Rita, Gustav, and Ike, even though SWEPCO's service territory is approximately 160 miles from the coast.

B. SWEPCO Transmission and Distribution Hardening

SWEPCO has taken steps to strengthen the ability of its transmission and distribution system to withstand extreme weather conditions, minimize customer outage time and restoration expense. SWEPCO already adheres to and carries out a number of system hardening activities. SWEPCO currently designs, builds and maintains its transmission and distribution facilities to meet and/or exceed National Electric Safety Code (NESC) and American National Standard Institute (ANSI) standards for its particular geographic areas in effect at the time of design and construction. SWEPCO also adheres to

standards set forth through the North American Electric Reliability Corporation's and SPP's guides. In addition to establishing materials standards, the NESC and ANSI define rules for the practical safeguarding of persons during the installation, operation and maintenance of electric lines and associated equipment. The NESC and ANSI contain the basic provisions that are considered necessary for the safety of employees and the public under the specified conditions. SWEPCO follows the NESC in both areas it serves in Texas, and continues to meet or exceed those standards. Although the current NESC exempts structures less than 60 feet above ground or water level from its extreme wind loading criteria, SWEPCO designs new and replacement facilities to meet or exceed the criteria. When needed, testing is done at a central facility for purposes of determining the adequacy of materials or standard designs.

C. Vegetation Management

SWEPCO vegetation management planning activity is addressed in the Company's summary report filed pursuant to 16 TAC § 25.96 in Project No. 41381, consistent with 16 TAC § 25.96(c).

D. Distribution Facilities Inspection

SWEPCO has in place a Cyclic Overhead Circuit Facilities Inspection and Maintenance Program. The objective of this program is to visually identify and correct deficiencies necessary for the safety of employees and the public under the conditions specified in the NESC and for system reliability. The target is to inspect 20% of the system per year for both overhead and underground facilities.

The program consists of a visual inspection of poles, conductors, and pole-mounted equipment (transformer, regulators, reclosers, capacitors, etc.) and related materials (insulators, brackets, terminations, cutouts, surge arresters, etc.). It includes inspection of foreign attachments (CATV, telephone, etc.) to the Companies' poles for any safety-related electrical or mechanical defects. Electrical and mechanical defects observed are identified

and the information is collected so appropriate corrective action can be taken.

During 2018, SWEPCO visually inspected over 2,000 miles of line. The Company changed out 2,094 poles at a cost of $4.92 million.

E. Emergency Operations Activities Summary

Each year for the AEP operations in the SPP region, the Emergency Response Plan (ERP) is reviewed and updated as necessary relative to maintaining reliability at AEP generating plants, transmission lines, and bulk power substation plans as well as restoration activities following a significant wide-spread outage. The comprehensive plan also addresses communication protocols and reporting, contact information for internal resources as well as neighboring electric utility systems, mutual assistance resources, training requirements, logistics and contingency plans.

SWEPCO annually conducts severe storm preparedness drills to exercise the ERP policies and procedures involving the Company's multiple business units and communication channels necessary to ensure the safety of the public, Company personnel, and mutual aid support personnel. Commission Staff has at times attended these drills. In October 2013, the SWEPCO Reliability Management and Distribution Dispatch Operations teams facilitated National Incident Management Systems Incident Command System (ICS) 345 training in Shreveport involving SWEPCO Distribution Operations, Corporate Communications, External Affairs, and Regulatory groups; community fire and police emergency response personnel in the SWEPCO Ark-La-Tex service territory; and the Texas Division of Emergency Management (TDEM) district coordinator based in Mt. Pleasant, Texas. Prerequisite courses for the ICS 345 training included ICS-100 and ICS-200. SWEPCO then conducted a company-wide ICS drill in September 2015 and implemented ICS in January 2016. ICS has been integrated into the SWEPCO ERP. SWEPCO held a second company-wide ICS drill in December 2016. SWEPCO activated ICS in May 2017 for the first time, in response to the Memorial Day storm system that brought excessive rain, 60 mile per hour wind, and two EF-1 tornadoes. This storm system caused the loss of power to over 100,000 customers across SWEPCO's service area,

including 62,000 in Texas.

In addition to regular internal review and communication of the ERP, SWEPCO maintains communication channels with city and county governments, the TDEM district coordinators, the media, regulators, and state legislators. Further, during storm or disaster recovery situations affecting the SWEPCO jurisdiction, SWEPCO is available to participate on the Texas State Operations Center (SOC) scheduled calls as requested and provides updates relating to system restoration progress and status for critical loads and emergency shelters to the Commission and the SOC.

Regular reviews that ensure the appropriate identification of critical care and critical load facilities are conducted by SWEPCO personnel and include hospice care facilities. Hospice care facilities were identified as a critical care premise and given a Priority 1 restoration status following an extended outage as a result of Senate Bill 937 in 2011, which addressed the prioritization of certain medical facilities by extending to nursing home facilities, assisted living facilities, and facilities providing hospice care services the same priority restoration status following an extended outage as that assigned to hospitals. Nursing homes and assisted living facilities were already identified as critical care facilities within the Company customer information system and as having the highest priority restoration status. SWEPCO monitors changes in customer status to keep information current

Annually, SWEPCO reviews its vendor inventory and updates contacts with local lodging facilities and vendor services. The Company has contracts with vendors to secure lodging during storm situations, and to supply bunk trailers, meals, and shower trailers if needed. SWEPCO's website is a source for information regarding outages and problems. SWEPCO's Outages & Problems page provides outage related information and is updated in real time. The customer can find outages by accessing the outage map, which is broken down by service territory and district. The customer can also create an account online and specifically check the status of their outage. In addition, SWEPCO Alerts was launched to our customers in March 2015. This service allows our customers to receive emails and text messages whenever there is a power outage reported in their area.