



**Legal Department** 

July 23, 2019

Honorable Kimberly D. Bose Secretary Federal Energy Regulatory Commission 888 First St., N.E. Washington D.C. 20426

Amanda Riggs Conner Senior Counsel -Regulatory Services (202) 383-3436 (P) arconner@aep.com

Re: American Electric Power Service Corporation Docket No. ER18-194-000

Dear Secretary Bose:

American Electric Power Service Corporation ("AEPSC"), on behalf of its affiliates, AEP Oklahoma Transmission Company, Inc. ("OK Transco"), and AEP Southwestern Transmission Company, Inc. ("SW Transco"), (collectively "AEP West Transcos") (AEPSC and the AEP West Transcos are collectively referred to herein as "AEP" or "Companies"), hereby submit for filing, for informational purposes, revisions to the 2019 projected transmission revenue requirements ("2019 Revised PTRR") in accordance with the March 21, 2019 settlement filed in in Docket No. ER19-1396 ("ROE Settlement")¹. As required in Section 3.3 of the ROE Settlement, AEP has requested that Southwest Power Pool, Inc. ("SPP") begin implementing the 2019 Revised PTRRs in the first full month following the issuance of an order approving the ROE Settlement. The 2019 Revised PTRR includes fully populated Microsoft Excel files with formulas intact.

Additionally, AEP has adjusted the 2019 Revised PTRR to exclude certain radial assets that were inadvertently included in the original 2019 projected rates. Over the course of 2018, AEP determined that these radial transmission assets<sup>2</sup> had been included in the transmission rates of the companies over the past several years and corrected the issue for 2018 and prior years as part of the 2018 Annual True-Up calculation in Docket No. ER18-194.

This settlement, resolving the ROE complaints filed by East Texas Electric Cooperative against PSO, et al in Docket Nos. EL17-76 and EL18-199, was approved by Letter Order issued on June 28, 2019.

Radial lines connecting to fewer than two non-affiliated customers do not meet the criterial for inclusion as transmission facilities defined by Attachment AI of the SPP Open Access Transmission Tariff.

The 2019 Revised PTRRs have been submitted to SPP for posting on its website at:

## http://opsportal.spp.org/OASIS/Directory/Member%20Related%20Postings

A copy of this notice of such posting was provided to SPP and the parties in this docket. The 2019 Revised PTRR contains no expenses or costs that have been alleged or judged in any administrative or judicial proceeding to be illegal, duplicative, or unnecessary costs that are demonstrably the product of discriminatory employment practices, as defined in 18 C.F.R. § 35.13(b)(7). In addition, the Companies have not made any material changes in its accounting policies and practices from those in effect during the previous rate year and upon which the current rate is based. Copies of the 2019 Revised PTRRs are also available at:

http://www.aep.com/about/codeofconduct/OASIS/TariffFilings/

Thank you for your attention to this informational filing. Please contact the undersigned if you have any questions concerning this filing.

Respectfully submitted,

## /s/ Amanda Riggs Conner

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