



## AMERICAN ELECTRIC POWER POLITICAL ENGAGEMENT REPORT JANUARY – JUNE 2024

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At American Electric Power, based in Columbus, Ohio, we understand that our customers and communities depend on safe, reliable, and affordable power. Our nearly 16,000 employees operate and maintain more than 40,000 miles of transmission lines, the nation's largest electric transmission system, and more than 225,000 miles of distribution lines to deliver power to 5.6 million customers in 11 states. AEP also is one of the nation's largest electricity producers with approximately 29,000 megawatts of diverse generating capacity, including nearly 6,000 megawatts of renewable energy. AEP's family of companies includes utilities AEP Ohio, AEP Texas, Appalachian Power (in Virginia and West Virginia), AEP Appalachian Power (in Tennessee), Indiana Michigan Power, Kentucky Power, Public Service Company of Oklahoma, and Southwestern Electric Power Company (in Arkansas, Louisiana, east Texas, and the Texas Panhandle). AEP also owns AEP Energy, which provides innovative competitive energy solutions nationwide.

American Electric Power works to help shape the legal and regulatory framework that applies to our rapidly evolving industry through routine, constructive engagement with government officials, policymakers, and stakeholder groups. Where permitted by law, AEP may contribute corporate funds to state and local candidates, parties, committees, ballot measures, and political organizations. Corporate contributions in support of candidates and entities reflect the Company's overall business interests. When contributions are made, they are done so without respect to either political party affiliation or private political preferences of any individual director, officer, or employee of AEP. No contribution will be given in anticipation of, in recognition of, or in return for any official act, and all corporate political contributions are disclosed.

AEP also interacts with trade associations and advocacy groups that indirectly support the corporation's policy goals. Our relationships with regulators and legislators, and our partnerships with advocacy organizations, are imperative to meeting customer demand for new, innovative solutions. We leverage our expertise and experience to educate regulators and key stakeholders about emerging technologies and associated issues.

### **Corporate Political Contributions**

In accordance with our Political Engagement Policy, all requests for Corporate Political Contributions must be reviewed and approved by AEP's Chief Compliance Officer – Political Engagement in advance, to ensure compliance with all applicable federal, state, and local laws, rules, and regulations, and AEP's Political Engagement Policy. In addition, all requests for Corporate Political Contributions are reviewed and approved by the appropriate AEP Executive Approver(s) in advance of payment.

For the period of January 1 through June 30, 2024, AEP made the following Corporate Political Contributions:

Republican Governors Associations	\$250,000
American Electric Power – Virginia – Committee for Responsible Government	\$200,000
Democratic Governors Association	\$100,000
National Governors Association Center for Best Practices	\$100,000
Republican State Leadership Committee	\$50,000
NCSL Foundation for State Legislatures	\$25,000
Republican Attorneys General Association	\$25,000
Republican Legislative Delegation Campaign Committee	\$7,500
Louisiana Democratic Party	\$5,000
Mike Braun for Indiana	\$5,000
Southern States Energy Board	\$5,000
Friends of Mike Francis	\$2,500
Ginther Mayoral Inaugural Committee	\$2,500
Tommy Chandler Campaign	\$2,500
Friends of Dr. Craig Green, LLC	\$1,000

#### **Trade Association Lobbying and Political Expenditures**

AEP belongs to various trade groups and other organizations that represent a broad spectrum of views on industry and policy issues. While we don't always agree with all of the views of these groups, we find value in having a seat at the table when key industry issues are being discussed. Many of these trade associations are politically active in their own right, on behalf of the utility industry or broader business interests. The Internal Revenue Code requires trade associations to inform contributors of the portion of annual dues, if any, attributable to lobbying or political expenditures. For those trade associations to which AEP pays dues of \$25,000 or more each year, we voluntarily disclose that portion of such dues not deductible under the Internal Revenue Code, as reported to us by the organization.

For the period covering January 1 through June 30, 2024, those amounts are as follows:

Edison Electric Institute	\$586,772
Association of Electric Companies of Texas	\$131,250
United States Chamber of Commerce	\$130,000
Business Roundtable	\$72,000
Alliance for Secure Energy, Inc.	\$60,000
Nuclear Energy Institute	\$41,604
Indiana Energy Association, Inc.	\$31,804
American Clean Power	\$25,500
Ohio Chamber of Commerce	\$15,000
Ohio Business Roundtable	\$10,000
Columbus Partnership	\$8,000
National Hydropower Association, Inc.	\$6,315

Columbus Chamber of Commerce	\$3,832
Indiana Chamber of Commerce	\$3,690
Experience Columbus	\$825

### Social Welfare Contributions

Social Welfare Organizations may engage in political activities using contributions we make. In accordance with AEP’s Political Engagement Policy, every request for a Social Welfare Contribution is reviewed and approved by AEP’s Chief Compliance Officer – Political Engagement and by appropriate AEP Executive Approver(s) before a contribution can be made.

While Social Welfare Organizations are not required by law to identify their contributors, AEP discloses its contributions of \$5,000 or more to Social Welfare Organizations voluntarily.

For the period covering January 1 through June 30, 2024, AEP made the following Social Welfare Contributions of \$5,000 or more:

The Ripon Society	\$25,000
Texas Taxpayers and Research Association	\$17,500
Charleston Area Alliance	\$5,800
Virginia Forever	\$5,500
Summer Motion, Inc.	\$5,000

### Definitions

For purposes of this report, AEP uses the same definitions that are found in AEP’s [Political Engagement Policy](#).

“AEP” means American Electric Power and any of its operating companies or subsidiaries, including AEP Ohio, AEP Texas, Appalachian Power, AEP Appalachian Power, Indiana Michigan Power, Kentucky Power, Public Service Company of Oklahoma, Southwestern Electric Power Company, AEP Transmission Holding Company and its subsidiaries, and AEP Energy and its subsidiaries. It does not include any AEP-affiliated political action committees or separate segregated funds.

“Chief Compliance Officer – Political Engagement” means the representative within the AEP legal department designated by AEP’s Chief Compliance Officer to review and approve requests subject to this Policy.

“Corporate Political Contribution” means a contribution of corporate funds or in-kind<sup>1</sup> contributions of goods or services by AEP to any Political Entity or any Independent Expenditure made with corporate funds.

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<sup>1</sup> In-kind contributions include efforts made by AEP employees in an official capacity on behalf of AEP to raise funds or garner support for Political Entities during working hours. While AEP employees are permitted to personally

“Executive Approver” means the individual or individuals identified below as having the authority to review and approve requests subject to this Policy by AEP’s approved process for implementing this Policy.

Requesting Entity	Payments ≤ \$ 1000	Payments > \$ 1000	Payments > \$ 10,000	Payments > \$ 50,000
Operating Companies	Operating Company Leader with sufficient financial authority <sup>2</sup>	Operating Company Director or Vice President of External Affairs (or similar title) <sup>3</sup>	Operating Company President/COO and AEP Executive Vice President of Government Affairs (or similar title) <sup>3</sup>	AEP Chief Executive Officer
Business Units	Business Unit Leader with sufficient financial authority <sup>2</sup>	Director or Vice President with relevant oversight of Business Unit function (or similar title) <sup>3</sup>	AEP Senior Vice President with relevant oversight of Business Unit function and AEP Executive Vice President of Government Affairs (or similar title) <sup>3</sup>	AEP Chief Executive Officer

“Government Official” means any official, officer, employee, or representative of, or any person acting in an official capacity for or on behalf of, any governmental entity (including federal, state, local, or municipal government department or agency), whether elected, appointed, retained, or otherwise employed, when that individual’s role or position involves oversight of or influence over AEP’s interests. This definition also includes any political party or party official or candidate for political office; and any company, business, enterprise, or other entity owned, in whole or in part, or controlled by any person described above.

“Independent Expenditure” means a political campaign communication (e.g., newspaper or TV ad, direct mailing, website) that expressly advocates for the election or defeat of a clearly identified candidate or ballot issue and that is not made in cooperation, consultation, or concert with or at the request or suggestion of a candidate, candidate’s authorized committee or political party.

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support whatever Political Entities they choose, in whatever manner they choose – through financial contributions or by donating their time -- all such personal contributions or volunteer activity must be done outside of work hours. Use of company time or resources in furtherance of such personal support is a violation of this Policy.

<sup>2</sup> Typically, this will be the direct supervisor of the individual making the request.

<sup>3</sup> Official titles may vary within an Operating Companies or Business Unit.

“Political Entity” is any of the following:

- Individual candidates for state or local office
- Political action committees
- State and local political parties and party committees
- Groups organized under Section 527 of the Internal Revenue Code (including but not limited to the following: Republican Governors Association, Democratic Governors Association, Republican Attorneys General Association, Democratic Attorneys General Association)
- State or local ballot initiatives or referenda
- Groups, regardless of their organizational structure, that may be considered political in nature in light of the inclusion of terms like “legislative,” “democratic,” “republican,” “government,” or similar terms in their name (e.g., National Conference of State Legislatures, Council of State Governments) or that are known to be political in nature by the individual making the request for contribution
- Independent expenditure-only committees (“Super PACs”) that engage in Independent Expenditures

Contributions labeled as “memberships” or “sponsorships,” if made to one of the above Political Entities, are nevertheless “Corporate Political Contributions” subject to this Policy. Any and all Corporate Political Contributions made by AEP must comply with all applicable federal and state laws, rules and regulations and this Policy. If the applicability of this Policy to any proposed contribution is unclear, the proposed contributor shall seek the review and, if deemed necessary, approval of the Chief Compliance Officer – Political Engagement before making such contribution.

“Political Activities” means activities that are conducted to support a Government Official or Political Entity and can include both direct or in-kind contributions (which include the use of corporate facilities, services, materials, or employee time) and events to solicit contributions (i.e., fundraisers).

“Social Welfare Contribution” means any contribution of corporate funds or in-kind contribution of goods or services by AEP to any Social Welfare Organization.

“Social Welfare Organization” is any organization not organized for profit but operated exclusively for the promotion of social welfare, operating under section 501(c)(4) of the Internal Revenue Code.