ANNUAL STANDARD TRUE-UP COMPLIANCE FILING FOR AEP TEXAS INC. CONCERNING RIDER SRC - SYSTEM RESTORATION CHARGE FACTORS AND RIDER ADFIT PUBLIC UTILITY COMMISSION OF TEXAS

TARIFF CONTROL NO. _____

ANNUAL STANDARD TRUE-UP COMPLIANCE FILING

JULY 28, 2025

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Files Provided Electronically on the PUC Interchange

Attachment 1 2 and Workpapers - Rider SRC Eff 202509.xlsx Attachment 4,5 and Workpapers - Rider ADFIT Rev9.0.xlsx

ANNUAL STANDARD TRUE-UP	§	
COMPLIANCE FILING FOR AEP	§	PUBLIC UTILITY COMMISSION
TEXAS INC. CONCERNING RIDER	§	
SRC - SYSTEM RESTORATION	§	OF TEXAS
CHARGE FACTORS AND RIDER	§	
ADFIT	§	

ANNUAL STANDARD TRUE-UP COMPLIANCE FILING

TO THE HONORABLE PUBLIC UTILITY COMMISSION OF TEXAS:

AEP Texas Inc. (AEP Texas or the Company) makes this Annual Standard True-Up compliance filing concerning Rider SRC – System Restoration Charge Factors and Rider ADFIT – ADFIT Credit, and in support thereof, respectfully shows as follows:

I. Background

On March 8, 2019, AEP Texas initially filed its application for a Financing Order under Subchapter G of Chapter 39 of the Public Utility Regulatory Act (PURA) to securitize the distribution-related system restoration costs incurred by AEP Texas due to Hurricane Harvey and other weather-related events in AEP Texas Central Division's service territory. That proceeding was assigned Docket No. 49308. On June 17, 2019, the Public Utility Commission of Texas (Commission) issued a Final Order (Financing Order) that authorized the issuance of system restoration bonds for AEP Texas for the securitizable balance and up-front qualified costs associated with such bonds through Rider SRC. In accordance with the Financing Order, AEP Texas Restoration Funding LLC (Bond Company) securitized the securitizable balance and other qualified costs on September 18, 2019 by issuing Senior Secured Restoration Bonds (System Restoration Bonds), and AEP Texas began billing Rider SRC September 18, 2019. AEP Texas is the Servicer for the Bond Company with respect to the System Restoration Bonds, and in that role, it bills, collects, receives, and adjusts the restoration charges imposed pursuant to AEP Texas Tariff for Retail Delivery Service, Section 6.1.1.4.6.1 – Rider SRC – System Restoration Charge Factors and remits the amounts received to the trustee to repay the System Restoration Bonds. The Financing Order, Schedule SRC, and Rider SRC set out the

rates and terms and conditions under which the system restoration charges will be billed and collected with respect to the System Restoration Bonds.

Additionally, AEP Texas proposed an accumulated deferred federal income tax (ADFIT) credit rider to provide customers the benefit of the ADFIT associated with the system restoration charges over the same period AEP Texas will collect the system restoration charges from customers.¹ AEP Texas implemented Schedule 6.1.1.4.7 Rider ADFIT – ADFIT Credit on September 18, 2019. The Financing Order requires AEP Texas to adjust the ADFIT credit rider using the same allocation factors and billing determinants as the system restoration charge true-up filings.²

Effective December 31, 2016, TCC and AEP Texas North Company (TNC) were merged into their parent company, now called AEP Texas. The merger was approved by the Commission in Docket No. 46050 – *Application of AEP Texas Central Company, AEP Texas North Company, and AEP Utilities, Inc. for Approval of Merger.* The Commission ordered AEP Texas to "maintain separate TCC and TNC divisions, which will continue to charge separate rates and riders, and maintain separate tariffs, unless and until such time as the Commission may consider and approve consolidated rates and tariffs." Consistent with the Commission's order, AEP Texas maintained two divisions within AEP Texas: AEP Texas – Central Division (formerly TCC) and AEP Texas – North Division (formerly TNC). In AEP Texas's rate case, Docket No. 49494, the Commission approved the combination of the central and north division rates, with a few exceptions. Schedule SRC and Rider ADFIT are two of those exceptions and continue to apply only to customers in the certified area previously served by AEP TCC.

¹ Application of AEP Texas Inc. for a Financing Order, Docket No. 49308, Financing Order at Findings of Fact 18-21 (June 17, 2019).

² *Id.* at Ordering Paragraph No. 3.

³ Application of AEP Texas Central Company, AEP Texas North Company, and AEP Utilities, Inc. for Approval of Merger, Docket No. 46050, Final Order at Ordering Paragraph No. 2 (Dec. 12, 2016).

⁴ Application of AEP Texas Inc. for Authority to Change Rates, Docket No. 49494, Order (Apr. 3, 2020).

II. Authorized Representatives

AEP Texas' authorized business and legal representatives are:

Steven Beaty Laura Bradshaw Kennedy

Regulatory Case Manager Senior Counsel

AEP Texas Inc. American Electric Power Service Corporation

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AEP Texas requests that all information, pleadings, and other documents in this matter be served on each of the persons above as well as emailed to aepaustintx@aep.com.

III. Purpose of Filing and Jurisdiction

The Company is filing for an annual standard true-up of its Rider SRC system restoration charges and corresponding Rider ADFIT in accordance with the Financing Order. The Commission has jurisdiction over this annual standard true-up under PURA §§ 39.303 and 39.307.

IV. Notice

In accordance with Ordering Paragraph No. 14 of the Financing Order, AEP Texas will provide notice of this compliance filing to all the parties to Docket No. 49308 by providing them with a copy of this filing on the same day this filing is made. In addition, AEP Texas will provide notice to the Office of Public Utility Counsel. In accordance with the Commission's Second Order Suspending Rules in Project No. 50664, AEP Texas will provide the notice via email. Proof of service is evidenced by the attached Certificate of Service.

V. Timing of Standard True-up

Finding of Fact (FOF) No. 80 of the Financing Order states that an annual true-up (Standard True-up) adjustment to the system restoration charges will be made by the Servicer to:

(a) correct any undercollections or overcollections, including without

- limitation any caused by REP defaults, during the preceding 12 months; and
- (b) ensure the billing of system restoration charges necessary to generate the collection of amounts sufficient to timely provide all scheduled payments of principal and interest (or deposits to sinking funds in respect of principal and interest) and any other amounts due in connection with the system restoration bonds (including ongoing fees and expenses and amounts required to be deposited in or allocated to any collection account or subaccount, trustee indemnities, payments due in connection with any expenses incurred by the indenture trustee or the servicer to enforce bondholder rights and all other payments that may be required pursuant to the waterfall of payments set forth in the indenture) during the period for which such adjusted system restoration charges are to be in effect.

Schedule SRC states that not less than 15 days prior to the first billing cycle for the Company's September billing month, and no less frequently than annually, the Servicer shall file a revised Rider SRC setting forth the upcoming SRC period's SRC rates (Adjusted SRC rates), complete with all supporting materials. The Adjusted SRC rates will become effective on the first billing cycle of the Company's September billing month. The Commission will have 15 days after the date of the true-up filing in which to confirm the accuracy of the Servicer's adjustment. Any necessary corrections to the Adjusted SRC rates, due to mathematical errors in the calculation of such rates or otherwise, will be made in a future true-up adjustment filing.

VI. Description of the Annual Standard True-up Adjustment to Rider SRC and Rider ADFIT

The Adjusted SRC rates and Rider ADFIT credit calculated in this filing will be effective with the first billing cycle of September 2025 through the last billing cycle for August 2026. The calculation of each is described below.

A. <u>Annual Standard True-up Calculation</u>

The Annual Standard True-up calculation is prescribed in Docket No. 49308 Financing Order FOF 82 and Schedule SRC. The Annual Standard True-up is to be calculated in the following manner:

- (a) allocate the upcoming period's periodic billing requirement [(PBR)] based on the PBRAFs approved in this Financing Order;
- (b) calculate undercollections or overcollections, including without limitation any caused by REP defaults, from the preceding period in each class by subtracting the previous period's system restoration charge revenues collected from each class from the [PBR] determined for that class for the same period;
- (c) sum the amounts allocated to each customer class in steps (a) and (b) to determine an adjusted [PBR] for each system restoration charge customer class; and
- (d) divide the amount assigned to each customer class in step (c) above by the appropriate forecasted billing units to determine the system restoration charge rate by class for the upcoming period.

Attachment 1:

Attachment 1 is a summary of the Rider SRC system restoration charge adjustment calculation. An explanation of each column in Attachment 1 is set out below.

Column (a) shows the PBRAF SRC class allocator approved in Docket No. 49308 FOF No. 80 and shown in Schedule SRC.

Column (b) shows the allocation of the PBR of \$28,372,279 for the period of September 2025 through August 2026 to the SRC classes using the PBRAF allocator. This amount corresponds to the actual interest rates and other factors known at issuance on September 18, 2019.

Column (c) shows the \$250,628 under-collection of SRCs by the payment date of August 1, 2025, which has been assigned to SRC classes based on the responsibility of each class.

Column (d) shows the Adjusted PBR of \$28,622,907, which is calculated by adding Columns (b) and (c).

Column (e) shows updated projected billing units from September 2025 through August 2026 based on the latest SRC forecast, which was revised in July 2025.

Column (f) shows the Adjusted SRC Rates calculated by dividing the Adjusted PBR in Column D by the Projected Billing Units in Column (e).

Workpapers (electronic version) supporting the calculation of Attachment 1 are included in the filing. Monthly Servicer's Certificates are available on the Company website at

https://aep.com/investors/securitizations/TexasRestoration/

Attachment 2:

Attachment 2 shows the SRC rates that became effective May 30, 2025, compared to the revised SRC rates. All SRC customer class rates decreased except for the residential class.

Attachment 3:

Attachment 3 is the revised Rider SRC tariff schedule that goes into effect August 28, 2025, the first billing cycle for the Company's September billing month.

B. Rider ADFIT Adjustment

Consistent with the Financing Order, Rider ADFIT is adjusted to accurately reflect the amount of ADFIT benefit available over the period of the rider's existence. Adjustment of Rider ADFIT must use the same allocation factors and billing determinants as the system restoration charge true-up filing.

Attachment 4:

Attachment 4 is a summary of the Rider ADFIT adjustment calculation. An explanation of each column in Attachment 4 is set out below.

Column (a) shows the PBRAF ADFIT class allocator approved in Docket No. 49308 FOF 80 and shown in Schedule SRC.

Column (b) shows the allocation of the PBR of (\$1,413,779) for the period of September 2025 through August 2026 to the ADFIT classes using the PBRAF allocator. This amount corresponds to the actual interest rates and other factors known at issuance on September 18, 2019.

Column (c) shows the (\$64,792) under-crediting of ADFIT by the payment date of August 1, 2025, which has been assigned to ADFIT classes based on the responsibility of each class.

Column (d) shows the Adjusted PBR of (\$1,478,571) which is calculated by adding Columns (b) and (c).

Column (e) shows updated forecasted billing units from September 2025 through August 2026 based on the latest ADFIT forecast, which was revised in July 2025.

Column (f) shows the Adjusted ADFIT Rates calculated by dividing the Adjusted PBR in Column (d) by the Forecasted Billing Units in Column (e).

Workpapers (electronic version) supporting the calculation of Attachment 4 are included in the filing.

Attachment 5:

Attachment 5 shows the Rider ADFIT rates that became effective August 28, 2024, compared to the revised Rider ADFIT rates. The credit rate increased for all classes. The rate change is due to a combination of changes to AEP's weighted average cost of capital in Docket No. 56165,⁵ timing tax benefit utilization, actual collections for each class as compared to the original ADFIT forecast, revised forecasted billing determinants, and other true-up amounts allocated or assigned to ADFIT rate classes.

Attachment 6:

Attachment 6 is the revised Rider ADFIT tariff schedule that goes into effect August 28, 2025.

VII. Affidavit

Attachment 7:

Attachment 7 is the affidavit of Ms. Katie M. Ives supporting this filing.

⁵ Application of AEP Texas Inc. for Authority to Change Rates, Docket No. 56165, Order (Oct. 3, 2024).

Respectfully submitted,

AMERICAN ELECTRIC POWER SERVICE CORPORATION

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ATTORNEY FOR AEP TEXAS INC.

CERTIFICATE OF SERVICE

In accordance with the Commission's Second Order Suspending Rules filed on July 16, 2020, in Project No. 50664, I certify that on July 28, 2025, a copy of this filing was provided by email to the Office of Public Utility Counsel and all parties of record in Docket No. 49308.

/s/ Gregory Gullickson

AEP TEXAS CENTRAL DIVISION SYSTEM RESTORATION CHARGE - RIDER SRC

Calculation of Rider SRC Rates

Interim True-up per Financing Order of Docket No. 49308

	(a)	(b)	(c)	(d)	(e)	(f)	
SRC Customer Class	PBRAF	Periodic Billing Requirement	Prior Period (Over)/Under Recovery	Adjusted PBR	Forecasted Billing Units	Adjusted Rider SRC Charge Rate	Billing Units
Residential	52.5194%	14,900,960	(205,659)	14,695,301	10,478,084,291	0.001402	per kWh
Secondary Service ≤ 10 kW	2.9287%	830,925	59,530	890,455	625,191,529	0.001424	per kWh
Secondary Service > 10 kW	31.8567%	9,038,476	391,417	9,429,893	35,555,284	0.265218	per kW
Primary Service	6.0053%	1,703,846	(57,463)	1,646,383	8,754,416	0.188063	per kW
Lighting Service	6.6899%	1,898,072	62,802	1,960,875	210,759,306	0.009304	per kWh
Total	100.0000%	28,372,279	250,628	28,622,907			

AEP TEXAS CENTRAL DIVISION SYSTEM RESTORATION CHARGE - RIDER SRC

Rate Comparison

	Period 1	Period 2		Rate Chan	ge
SRC Customer Class	Rider SRC Rate	Rider SRC Rate	Billing Units	per unit	%
Residential	0.001126	0.001402	per kWh	0.000276	24.51%
Secondary Service ≤ 10 kW	0.001723	0.001424	per kWh	(0.000299)	-17.35%
Secondary Service > 10 kW	0.348575	0.265218	per kW	(0.083357)	-23.91%
Primary Service	0.195383	0.188063	per kW	(0.007320)	-3.75%
Lighting Service	0.012050	0.009304	per kWh	(0.002746)	-22.79%
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TARIFF FOR ELECTRIC DELIVERY SERVICE

Applicable: Certified Service Area previously served by AEP Texas Central Company

Chapter: 6 Section: 6.1.1

Section Title: Delivery System Charges

Revision: Ninth Effective Date: August 28, 2025

6.1.1.4.6.1 RIDER SRC – SYSTEM RESTORATION CHARGE FACTORS

AVAILABILITY

This schedule is applicable to billed energy consumption and demands of retail customers taking service from the Company during the term that this schedule is in effect, and to the facilities, premises, and loads of all other retail customers obligated to pay Rider SRC Charges as provided in Schedule SRC, Section 6.1.1.4.6. Terms defined in Schedule SRC that are used herein shall have the same meaning as set forth in Schedule SRC.

RATE CLASSES

For purposes of billing System Restoration Charge Rates (SRC Rates), each retail end-use customer will be designated as a customer belonging to one of five classes as identified by Schedule SRC.

SYSTEM RESTORATION CHARGE RATES

System Restoration Charge Customer Class	SRC Rates		
Residential	\$0.001402	per kWh	I
Secondary Service Less Than or Equal to 10 kW	\$0.001424	per kWh	R
Secondary Service Greater Than 10 kW	\$0.265218	per Distribution Billing kW	R
Primary Service	\$0.188063	per Distribution Billing kW	R
Lighting Service	\$0.009304	per kWh	R

The SRC Rates are multiplied by the kWh or kW, as applicable, read, estimated or determined during the billing month and will be applied to bills rendered on and after the effective date.

SYSTEM RESTORATION CHARGE TRUE-UP

The Restoration Charge Rates shall be determined in accordance with and are subject to the provisions set forth in the Financing Order and Schedule SRC. Not less than 15 days prior to the first billing cycle for the Company's September billing month and no less frequently than annually thereafter, the Company or successor Servicer will file a revision to Rider SRC setting forth the adjusted SRC Rates to be effective for the upcoming period. If made as a result of the annual true-up adjustment in Schedule SRC, the adjusted SRC Rates will become effective on the first billing cycle of the Company's September billing month. In accordance with Schedule SRC, an interim true-up is mandatory semi-annually (or quarterly after the final scheduled payment date of the last tranche of the system restoration bonds) if the Servicer forecasts that system restoration charge

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TARIFF FOR ELECTRIC DELIVERY SERVICE

Certified Service Area previously served by AEP Texas Central Company Applicable:

Section: 6.1.1 Chapter:

Section Title: Delivery System Charges

Revision: Effective Date: August 28, 2025 Ninth |T|

collections will be insufficient to make all scheduled payments of principal, interest and other amounts in respect of the System Restoration Bonds on a timely basis during the current or next succeeding payment period and/or or to replenish any draws upon the capital subaccount. Optional interim true-ups may also be made at any time as described in Schedule SRC. If an interim trueup adjustment is made pursuant to Schedule SRC, the Adjusted SRC Rates will be become effective on the first billing cycle of the Company's billing month that is not less than 15 days following the making of the interim true-up adjustment filing. In the event that the forecasted billing units for one or more of the System Restoration Charge customer classes for an upcoming period decreases by more than 10% of the threshold billing units set forth in the Financing Order, the Servicer shall make a true-up filing at least 90 days prior to the first billing cycle for the Company's September billing month.

NOTICE

This rate schedule is subject to the Company's Tariff and Applicable Legal Authorities.

AEP TEXAS CENTRAL DIVISION ACCUMULATED DEFFERED FEDERAL INCOME TAX CREDIT - RIDER ADFIT

Calculation of Rider ADFIT Rates

Standard True-up per Financing Order of Docket No. 49308

	(a)	(b)	(c)	(d)	(e)	(f)	
ADFIT Customer Class	PBRAF	Periodic Billing Requirement	Prior Period Over/(Under) Credit	Adjusted PBR	Forecasted Billing Units	Adjusted Rider ADFIT Charge Rate	Billing Units
Residential	52.5194%	(742,509)	(10,896)	(753,405)	10,478,084,291	(0.000072)	per kWh
Secondary Service ≤ 10 kW	2.9287%	(41,405)	(3,264)	(44,668)	625,191,529	(0.000071)	per kWh
Secondary Service > 10 kW	31.8567%	(450,384)	(38,997)	(489,380)	35,555,284	(0.013764)	per kW
Primary Service	6.0053%	(84,902)	(7,278)	(92,180)	8,754,416	(0.010529)	per kW
Lighting Service	6.6899%	(94,580)	(4,358)	(98,938)	210,759,306	(0.000469)	per kWh
Total	100.0000%	(1,413,779)	(64,792)	(1,478,571)			

AEP TEXAS CENTRAL DIVISION ACCUMULATED DEFFERED FEDERAL INCOME TAX CREDIT - RIDER ADFIT

Rate Comparison

	Period 1	Period 2		Rate Chan	ge
ADFIT Customer Class	Rider ADFIT Rate	Rider ADFIT Rate	Billing Units	per unit	%
Residential	(0.000059)	(0.000072)	per kWh	(0.000013)	22.03%
Secondary Service ≤ 10 kW	(0.000063)	(0.000071)	per kWh	(0.000008)	12.70%
Secondary Service > 10 kW	(0.012576)	(0.013764)	per kW	(0.001188)	9.45%
Primary Service	(0.008405)	(0.010529)	per kW	(0.002124)	25.27%
Lighting Service	(0.000434)	(0.000469)	per kWh	(0.000035)	8.06%

AEP TEXAS

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TARIFF FOR ELECTRIC DELIVERY SERVICE

Applicable: Certified Service Area previously served by AEP Texas Central Company

Chapter: 6 Section: 6.1.1

Section Title: Delivery System Charges

Revision: Sixth Effective Date: August 28, 2025

6.1.1.4.7 RIDER ADFIT – ADFIT CREDIT

APPLICABILITY

Pursuant to Public Utility Commission of Texas Docket No. 49308, the ADFIT Credit is a negative charge to customers subject to Schedule SRC to provide customers the accumulated deferred federal income tax (ADFIT) benefits associated with Hurricane Harvey and other system restoration costs.

This schedule is applicable to billed energy consumption and demands of retail customers taking service from the Company during the term that this schedule is in effect, and to the facilities, premises, and loads of all other retail customers obligated to pay Rider SRC Charges as provided in Schedule SRC, Section 6.1.1.4.6.1 Terms defined in Schedule SRC that are used herein shall have the same meaning as set forth in Schedule SRC.

TERM

This Rider ADFITC is effective beginning on the date Schedule SRC is effective and will remain in effect over the 10-year term of Schedule SRC.

ADFIT ALLOCATION FACTORS

The ADFIT Allocation Factors are the same as the PBRAFs in Schedule SRC.

ADFITC RATES

The ADFITC Credits to be applied beginning on the effective date of this Rider ADFITC are set out below. The ADFITC rate classes and billing units are the same as the classes and billing units in Rider SRC. In addition, ADFITC Credits are applicable to each customer which has New On-Site Generation as defined in Schedule SRC, and to customers in multiply-certificated areas who request to switch from AEP Texas to another service provider on or after the date of approval of the Financing Order in Docket No. 49308, as and to the extent Schedule SRC charges are applicable to such customers. ADFITC Credits to be applied in subsequent periods will be determined in the annual true-up process.

AEP TEXAS

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TARIFF FOR ELECTRIC DELIVERY SERVICE

Applicable: Certified Service Area previously served by AEP Texas Central Company

Chapter: 6 Section: 6.1.1

Section Title: Delivery System Charges

Revision: Sixth Effective Date: August 28, 2025

ADFITC Rate Class	ADFITC Rates
Residential	(\$0.000072) per kWh I
Secondary Service Less Than or Equal to 10 kW	(\$0.000071) per kWh I
Secondary Service Greater Than 10 kW	(\$0.013764) per Distribution Billing kW I
Primary Service	(\$0.010529) per Distribution Billing kW I
Lighting Service	(\$0.000469) per kWh

The ADFITC Rates are multiplied by the kWh or kW, as applicable, read, estimated or determined during the billing month and will be applied to bills rendered on and after the effective date.

ADFITC TRUE-UP ADJUSTMENT

ADFITC Charges shall be adjusted annually effective on each date that charges in Schedule SRC become effective. The ADFITC true-up will be performed at the same time, using the same methodology and billing determinants, as the Standard True-Up or Non-Standard True-Up for Rate Schedule SRC. The ADFITC Charges shall be adjusted to (1) correct any over-credit or undercredit of the amounts previously scheduled to be provided to customers and (2) reflect the amounts scheduled to be provided to customers during the period the adjusted ADFITC Charges are to be effective.

OTHER TERMS AND CONDITIONS

If the customer or REP pays only a portion of its bill, a pro-rata portion of ADFITC Charge credits will be credited equal to the pro-rata portion of Schedule SRC collected according to Schedule SRC.

NOTICE

This rate schedule is subject to the Company's Tariff and Applicable Legal Authorities.

AFFIDAVIT OF KATIE M. IVES

STATE OF OKLAHOMA
COUNTY OF TULSA

BEFORE ME, the undersigned notary public, on this day personally appeared Katie M. Ives, who first being duly sworn, upon this oath said:

- 1. My name is Katie M. Ives. I am over the age of 21, a resident of Oklahoma, and of sound mind and competent to testify to the matters stated herein. I am a Regulatory Consultant for American Electric Power Service Corporation, authorized to represent AEP Texas Inc.
- 2. I have reviewed the Interim True-Up Compliance Filing of AEP Texas Inc. concerning Rider SRC System Restoration Charge Factors and the statements and information therein are true and accurate to the best of my knowledge and belief, and I hereby adopt them as my own.

The foregoing statements are true and correct. This concludes my affidavit.

Katie M. Ives

SUBSCRIBED AND SWORN BEFORE ME by the said Katie M. Ives this 23th day of July 2025.

Notary Public in and for the State of

Øklahoma