



Louisiana Public Service Commission

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December 12, 2025

VIA EMAIL ONLY

RFP 25-17 – DOCKET NO. U-37794, Southwestern Electric Power Company, ex parte. In re: Application for authorization of a System Improvement Plan, including related rate recovery.

To all LPSC qualified outside consultants:

Enclosed please find a Request for Proposals (“RFP”) for an **outside engineering consultant** issued by the Louisiana Public Service Commission. If your firm is interested in submitting a proposal, please review the RFP carefully to ensure you adhere to the requirements contained therein, as well as to determine whether your firm meets the specific requirements of the RFP. All Proposals must include a showing that your firm possesses the requisite qualifications and experience to represent the Commission in this matter. Please note that deviations from the requirements contained in the RFP, or conditional bid amounts, shall result in the rejection of a proposal as non-conforming.

All Proposals, including the original, plus (1) one copy, and an electronic copy must be received on or **before Tuesday, January 6, 2026 by noon**. Selection of consultants is anticipated to take place at the Commission’s January 2026 Business and Executive Session. If you have any questions regarding this matter, please do not hesitate to contact me.

Sincerely,

Kathryn Bowman
Executive Counsel

Encl.

cc: Brandon M. Frey, Executive Secretary
Arvind Viswanathan, Staff Counsel

RFP 25-17
LOUISIANA PUBLIC SERVICE COMMISSION
REQUEST FOR PROPOSALS (“RFP”)
December 12, 2025

DOCKET NO. U-37794, Southwestern Electric Power Company, ex parte. In re: Application for authorization of a System Improvement Plan, including related rate recovery.

The Louisiana Public Service Commission (“Commission” or “LPSC”), in accordance with the requirements of the LPSC General Order dated November 10, 2014 regarding the selection of contract employees (the “Contract Order”), issues this Request for Proposals (“RFP”) to **outside consultants**, who will assist Commission Staff in the review of Southwestern Electric Power Company’s (“SWEPCO” or “Company”) request for approval of a System Improvement Plan.

Consideration of qualifying bids received in response to RFP 25-17 are anticipated to be on the Commission’s January 2026 Business and Executive Session. Should an Applicant be selected at the Commission’s B&E, this RFP and the Applicant’s proposal shall constitute the contract between the parties, including all terms and conditions. The Commission will not accept new terms, conditions, or proposals once an Applicant has been retained.

Please note, deviations from the requirements contained herein, or conditional bid amounts, shall result in rejection of the bid as non-conforming.

I. Overview

On November 24, 2025, SWEPCO filed its request, which was docketed as Docket No. U-37794, and published in the Commission’s Bulletin dated December 5, 2025 for a twenty-five-day intervention period. As of this RFP, no party has intervened.

SWEPCO’s request is to implement a System Improvement Plan (“SIP”) and authorize the appropriate ratemaking treatment related to the Plan. Per SWEPCO’s application, the SIP is to complement and enhance the Company’s existing resiliency investments to harden the distribution system; it is designed to address the identified system vulnerabilities, including weather-related impacts, vegetation interference and aging assets.¹ SWEPCO’s SIP seeks approval of approximately \$401.8 million of achievable, resiliency projects, which would fully trim approximately 6, 095 line-miles of right-of-way and harden over 629 line-miles over roughly four years.² The SIP is the Company’s next step in enhancing customer experience and reducing customer minutes of interruption, and complements ongoing efforts to enhance reliability.³ SWEPCO identifies three types of resiliency programs as part of the SIP: 1) enhanced vegetation management; 2) distribution feeder hardening; and 3) distribution lateral hardening.⁴

¹ See Application, page 3.

² *Id.*

³ See Application, page 7.

⁴ *Id.*

Cost Recovery Request

SWEPCO is proposing a two-pronged approach to cost recovery of the proposed SIP – a pilot program recovered in a similar manner as its current vegetation management spend. Additionally, SWEPCO proposes a rider with O&M costs associated with the Plan being placed in a regulatory asset and recovered along with capital costs and capital-related expenses. SWEPCO proposes amortizing, including carrying costs, over a five-year period that would begin with the year the expenses are incurred.⁵

The Company filed the testimony of three witnesses in support of its application. Staff encourages all Applicants to review the entire filing for more information on SWEPCO's request.

Applicants will be assisting Commission in-house Staff (Legal, Utilities, and Auditing Divisions) in reviewing the Company's request and providing a recommendation to the Commission.

II. Scope of Representation

In assisting Staff, Applicants will review the application (including the direct testimony of three witnesses, any supporting documentation, and associated cost models); draft data requests and review responses thereto; potentially participate in informal meetings with Staff and SWEPCO, Staff and Intervenors (if any), or Staff, SWEPCO, and Intervenors; assist in drafting a recommendation(s), including testimony, to the Commission regarding SWEPCO's request on implementing the Rider for cost recovery of the SIP, including the regulatory asset; review and respond to any rebuttal testimony; assist in preparing any necessary direct and cross-answering testimony; assist in trial preparation, including cross-examination of witnesses and drafting pleadings and motions related thereto; and review and analyze potential stipulation terms. Applicants shall assume this matter will result in a contested proceeding.

Additionally, the Applicant shall be available to participate in meetings, conference calls, status conferences, hearings, and other conferences with the Commission and its Staff, as well as attending any Business and Executive Session(s) that Staff deems necessary.

The scope of work provided herein shall continue through the conclusion of the docket, including Commission consideration of the request at a B&E, or B&Es regardless if the matter proceeds through a stipulated or contested process.

All proposals shall include an outline of a plan of action for conducting the review of the application, including the activities described above. The Commission and its Staff shall have the right to determine how the tasks will be carried out, including setting internal deadlines if necessary to ensure all work is completed timely. Please note that the use of ChatGBT or any other AI type platform is strictly prohibited when reviewing and analyzing information provided to the Commission pursuant to Commission Rule of Practice and Procedure, Rule 12.1.

⁵ See Application, pg 9.

III. Period of Representation

The time period estimated to complete the Scope of Representation is approximately 12 months. This is merely an estimate and the Commission makes no representations as to the accuracy of the Period of Representation.

IV. Minimum Requirements

To qualify, all proposals shall be accompanied by a professional firm resume indicating the qualifications and experience necessary to meet the requirement of this RFP, including experience with reviewing riders as a cost recovery mechanism. Further, all Applicants must have requisite knowledge of the topics listed below, in addition to those provided in Commission's Contract Order. Consideration will be given to factors which indicate degrees of competence such as the amount of practical experience in the field of public utility practice, similar practice before this or other regulatory agencies, and knowledge of Louisiana ratemaking standards and regulatory law.

Applicants shall at a minimum be experienced in analyzing the operations, books, and records of utility companies, particularly investor-owned utilities, for the purpose of setting just and reasonable rates, including, but not limited to, calculation of rate base, rates of return, capital structure, formula rates, cost recovery via riders, and all related studies and calculations and prior cost recovery filings with the LPSC.

Applicants shall be qualified and prepared to draft and render expert testimony and be cross-examined with respect to all of the issues addressed in this RFP and which are likely to arise in the proceeding and be qualified and prepared to render testimony at a hearing and/or a B&E regarding the same and have knowledge of:

- (1) a detailed understanding of the major functional areas of a regulated investor-owned electric utility;
- (2) appropriate accounting standards and practices for electric public utilities, public utility accounting, and generally accepted auditing standards;
- (3) the LPSC and FERC approved cost-of-service cost methodologies for electric utilities;
- (4) the basic components and requirements of SWPECO's Formula Rate Plan, including cost of capital, capital structure, cost of debt, cost of equity, and rates of return, as well as currently approved riders, as well as SWEPCO's current vegetation management plan;
- (5) the cost allocation methodologies for the allocation of investments and expenses among affiliates, including the relationship of the holding company to its subsidiary operating companies, the transfer of investment and costs between operating companies, and the provision of services among affiliates; and
- (6) appropriate mechanisms, allocation among customer classes and rate design.

V. Estimate of Costs

Applicants shall provide an overview of the estimated costs in the summary of the bid proposal. All proposals shall include fees and direct costs in order to provide the services described above. Applicants responding to this RFP shall quote their rates on an hourly basis, and shall submit a total budget, separating professional fees from direct costs.

Applicants shall only be allowed to charge for actual hours of work performed and costs incurred. Once selected, an Applicant's hourly rates and budget shall not be altered except by formal approval of the Commission.

VI. Conflict of Interest

Applicants shall prominently and separately disclose current, as well as past, employment which could possibly result in a conflict of interest. Potential conflicts could include, but are not to be limited to, employment with regulated utilities, affiliates of regulated utilities, consumer advocacy groups, or any other party that comes before the Commission. In addition, Applicants shall disclose matters in which they currently represent clients before the Commission.

VII. Billing Guidelines

As required by the November 10, 2014 General Order, all bills will be rendered to the Commission monthly and shall specifically identify and describe all work performed, the person performing such work, the time and charge for such work, and shall additionally show the total amount billed to date and the authorized original estimate. Bills will be rendered in strict accordance with the Commission's guidelines. Pursuant to La. R.S. 45:1180, SWEPCO is the ultimate responsible party for payment of services provided pursuant to this RFP; therefore, timely submittal of invoices to the Commission facilitates timely payments to Applicant.

Expenses shall also be separately disclosed with proof of such expenses attached. Expenses, where applicable, shall be reimbursed at state authorized rates as specified in the Travel Policies and Procedures Memorandum issued by the State of Louisiana, Division of Administration in effect at the time such expenses are incurred ("Allowable Expenses"). Any expenses that exceed the Allowable Expenses shall be borne by the contract employee and shall not be reimbursed by either the Commission, or the correspondent utility, unless otherwise specified by the Commission.

VIII. Reservation of Rights

The LPSC reserves the right to reject any and all proposals, to amend and/or supplement this RFP at any time, and to consider proposals or modifications thereof received at any time prior to LPSC vote at Open Session, if such action is found by the LPSC to be in the public interest. Pursuant to the General Order regarding the selection of contract employees, the LPSC has the right to accept any offer and does not have to accept the lowest bid amount. In addition, there is also no assurance, express or implied, that an award will necessarily be made pursuant to this RFP.

IX. Submission of Proposals

Interested parties should submit the **original (hard copy), 2 copies, and e-mail an electronic copy** of the proposal to:

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602 North Fifth Street (Galvez Building) (70802)
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Email: kim.obrian@la.gov
kathryn.bowman@la.gov

To be considered, all proposals must be received on or before **Tuesday, January 6, 2026 by noon**. Selection of consultants is anticipated to take place at the Commission's January 2026 Business and Executive Session. Information concerning billing procedures and the Commission's RFP policy may be obtained from the address listed above, or by calling (225) 342-9888.