

REQUEST FOR EXTENDED IMPLEMENTATION PERIOD

Pursuant to Section 90.629 of the Commission's rules, American Electric Power Service Corporation and its subsidiary AEP Texas, Inc. (collectively "AEP" or "Company") hereby requests an extended implementation plan to allow AEP two years to construct, test, and place into operation the Texas portion of AEP's overall 11-state upgrade and replacement of its current EDACS 800 MHz radio system. The size and complexity of this upgrade, the need to integrate and coordinate operations over multiple sites both within and across regions, and the funding required to support this massive undertaking requires more than the standard 12-month period set forth in the Commission's rules that would apply to a more limited endeavor.

As more fully described in the Request for Waiver that is associated with the instant application and that is incorporated herein by reference, AEP delivers electricity and custom energy solutions to nearly 5.4 million customers over an 11-state operating area. AEP's overall operations include a more than 40,000-mile transmission system network with more 765-kilovolt extra-high voltage transmission lines than all other U.S. transmission systems combined and 219,000 miles of distribution lines.

AEP has undertaken a multi-year project of upgrading its current EDACS 800 MHz radio system across all 11 states to increase its data applications by including enhanced VGPS/AVL for telematics detailed diagnostics, fixed data for gridSMART distribution automation, take-out point for Advanced Meter Infrastructure, and fixed data for transmission services such as transformer monitoring. The current EDACS system was built in the early 1990s. While the radio system served AEP and its customers well for many years, the equipment is no longer supported by the vendor. This is creating a serious risk to bulk electrical systems and AEP customer base. Even if it were vendor-supported, the current system technology design cannot support the new communication challenges that are essential to the operation of a modern utility or the functionality plans for the future. The replacement P25 system offers the capabilities that will allow AEP to provide significantly more energy-efficient, cost-effective service to the public. These enhancements are essential to continue addressing high-volume situations such as service restoration during power outages.

Due to the immensity of the undertaking, AEP is proceeding with its project by region. Pursuant to prior Commission applications and grants, AEP has already completed the bulk of its Ohio upgrade and has on file or will soon be submitting separately applications necessary for the upgrade of AEP's Oklahoma EDACS system which AEP believes that it will be able to complete within a regularly authorized 12-month period. AEP's staged implementation plan calls for Texas to follow and, in this case, AEP has determined that more than 12-months will be required to complete the Texas portion of the project which as shown in the attached implementation schedule is itself broken down by subregions within the state with separate no later than (NLT) dates shown for the construction of new or relocated base station facilities and their cutover to the P-25 system which must be done all at once within each sub-region so that crews working throughout the subregion will have a single system with which to communicate.

While the instant application covers “only Texas,” it includes:

1. Moving the location of many current 800 MHz EDACS base station locations to new locations (44 site moves of the 82 sites) both to better serve AEP’s changing customer service requirements and as needed to meet other technical system and reliability concerns. AEP notes that moving locations is more spectrum efficient than just adding additional communication tower sites.
2. Adding coverage improvement sites (14 new sites of the 82 sites). These are new location to meet customer service area growth, which could not be covered by the site moves.
3. Adding additional frequencies at some sites (17 sites of the 82 sites). These additional frequencies are required to meet the new requirements for expanded services, faster outages restoration, and to protect the health, safety and welfare of the public and the company employees from harm.
4. Changing from the existing analog EDACS system to an advanced digital P25 system (all 82 sites). This cutover requires not one site at a time, but a group of several base station by sub-regional area.

AEP has already completed a great deal of advance work on the Texas portion of its project. Among other activities: the system is fully designed; funding is in place; equipment has either been delivered or is on order; FAA clearances where needed have been obtained; and virtually all right of way and zoning matters have been resolved. Nevertheless to allow the safe and orderly completion of all of the remaining work that is required, a limited extension period (12-month extension on top of the 12 months that would be available without an extension) is hereby respectfully requested.

<u>Site Name</u>	<u>Call Sign</u>	<u>ASR Number</u>	<u>P25 Cutover Region</u>	<u>EDACS Relocate NLT Date</u>	<u>P25 NLT Coverover Date</u>
Ajo TS	New Site	1311862	TCC2	April 1, 2021	August 1, 2021
Alice SC TS	WPMG831	1050069	TCC2		August 1, 2021
Balmorhea LMR TS	WQVM371	1247829	TNC3	July 1, 2021	August 1, 2021
Barnhart TS	WQCF284	1309721	TNC3	July 1, 2021	August 1, 2021
Bay City SC TS	WQUD806	1302416	TCC2	April 1, 2021	August 1, 2021
Beeville TS	WPCN236	1310305	TCC2	April 1, 2021	August 1, 2021
Best TS	KNNK722	1052041	TNC3		August 1, 2021
Bishop LMR TS	WPCB285	1312811	TCC2	April 1, 2021	August 1, 2021
Bullfrog Mtn TS Leased	WPCB214	1291197	TNC3	July 1, 2021	August 1, 2021
Capote TS	WPCB278	1310491	TCC2	April 1, 2021	August 1, 2021
Carancahua TS	WPCB286	1311960	TCC2	April 1, 2021	August 1, 2021
Cienega Peak TS	WPCB279	N/A – Tower is under 200 feet	TNC3		August 1, 2021
Coleta Creek TS	WPCB290	1050432	TCC2		August 1, 2021
Corpus Christi Home Office	WPCN224	1050315	TCC2		August 1, 2021
Edna TS	New Site	N/A – Tower is under 200 feet	TCC2		August 1, 2021
El Campo TS	WREP260	1302413	TCC2		August 1, 2021
Falfurrias TS	WPFW719	1302417	TCC2		August 1, 2021
Fashioning TS	WPCN240	1310302	TCC2	April 1, 2021	August 1, 2021
Ft. Davis LMR TS	WPKL367	1310136	TNC3	July 1, 2021	August 1, 2021
Ft. Stockton TS	WPCB297	1310492	TNC3	July 1, 2021	August 1, 2021
Glidden TS	WPCN232	A1152368	TCC2	April 1, 2021	August 1, 2021
Green Lake TS	WPMD397	1309915	TCC2	April 1, 2021	August 1, 2021
Iraan LMR TS	WPJT369	1299441	TNC3		August 1, 2021
Kenedy LMR TS	WPCB270	1311569	TCC2	April 1, 2021	August 1, 2021
Live Oak LMR TS	WQBP323	1309098	TCC2	April 1, 2021	August 1, 2021
Lon Hill TS	WPCN224	1264207	TCC2	April 1, 2021	August 1, 2021
Marfa TS	WPCN209	1311607	TNC3	July 1, 2021	August 1, 2021
McCarney TS	WPIZ577	1308313	TNC3	July 1, 2021	August 1, 2021
Ozona TS	WPCM989	1313857	TNC3	July 1, 2021	August 1, 2021
Presidio TS	WRDW851	N/A – Monopole Tower is under 200 feet	TNC3	July 1, 2021	August 1, 2021
Refugio TS	WPCB258	1202085	TCC2		August 1, 2021
Sonora TS	WPCB255	1064804	TNC3		August 1, 2021
Tradewinds TS	WPIQ556	1313951	TCC2	April 1, 2021	August 1, 2021
Yorktown TS	New Site	1308155	TCC2	April 1, 2021	August 1, 2021