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February 4, 2021

**VIA ELECTRONIC FILING**

Connie Graley, Executive Secretary  
Public Service Commission of West Virginia  
201 Brooks St.  
Charleston, West Virginia 25301

Re: Case No. 20-0368-E-PC  
Appalachian Power Company and  
Wheeling Power Company

Dear Ms. Graley:

I enclose herewith for filing on behalf of Appalachian Power Company and Wheeling Power Company the original and twelve (12) copies of the **Commission Request Filing of Appalachian Power Company and Wheeling Power Company.**

Very truly yours,

William C. Porth (WV Bar #2943)

Counsel for Appalachian Power Company  
And Wheeling Power Company

WCP:sr  
cc: Service List  
Enclosures

**PUBLIC SERVICE COMMISSION  
OF WEST VIRGINIA  
CHARLESTON**

**CASE NO. 20-0368-E-PC**

**APPALACHIAN POWER COMPANY and  
WHEELING POWER COMPANY,**  
public utilities.

Petition for consent and approval to  
Maintain Reliability Index Targets  
Approved in Case No. 18-0588-E-PC

**COMMISSION REQUEST FILING OF  
APPALACHIAN POWER COMPANY  
AND WHEELING POWER COMPANY**

COME NOW Appalachian Power Company (“APCo”) and Wheeling Power Company (“WPCo”) (together, the “Companies”) and submit this filing on reliability index targets in response to the Commission’s request for new proposed targets.

1. On May 1, 2020, the Companies filed a petition requesting the Commission to maintain their current reliability index targets and establishing May 1, 2024 as the date for the filing of the Companies’ next petition regarding reliability index targets.

2. By Order dated October 16, 2020, the Commission scheduled a status conference in this matter for November 19, 2020.

3. On November 19, 2020, the status conference took place, as an actual proceeding in the Commission’s main hearing room, with some persons participating virtually.

4. At the November 19, 2020 status conference, the Commission asked the Companies to submit new reliability index targets as input that the Commission could consider if

it were inclined to establish new targets, notwithstanding the recommendations of the Companies and the Staff that the current targets remain in effect. The Commission also invited the Companies to offer an argument as to why the Commission should or should not adopt whatever new targets the Companies submitted. November 19, 2020 Tr. at 61.

5. The Commission requested that the Companies make their submission of new reliability index targets by December 30, 2020. Prior to that date, the Companies approached the Commission informally and reported their difficulty with complying with that deadline and received the Commission's informal acquiescence in their making the requested filing at a later date. The Companies are grateful for the Commission's forbearance with respect to its deadline and are now able, albeit belatedly, to make the filing of new targets as the Commission requested.

6. The new reliability index targets calculated for each of the Companies are presented in Appendix A to this filing. They were arrived at by taking the Companies' SAIDI, CAIDI, and SAIFI performance for the years 2016 through 2020, averaging those numbers to obtain the new optimal targets, and then adjusting the minimum targets by one standard deviation. The mathematical results are targets which are less stringent than the existing reliability index targets.

7. The Companies do not recommend that the Commission adopt the recalculated targets set forth in Appendix A. While less stringent targets would be easier for the Companies to achieve on a consistent basis, the Companies submit that it is the better course of action for the Companies to continue to strive to comply with the existing more stringent targets.

Respectfully submitted,

**APPALACHIAN POWER COMPANY  
WHEELING POWER COMPANY**

By Counsel



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Counsel for Appalachian Power Company  
And Wheeling Power Company

Dated: February 4, 2021

Commission Request Filing  
Appendix A

APCo	2016	2017	2018	2019	2020	Ave	STDEV	1 STDEV	Recalculated		Current	
									Min Target	Optimal Target	Min Target	Optimal Target
SAIDI	513.74	481.34	644.64	594.98	562.56	559.45	64.65	624.10	624.10	559.45	551.92	488.86
CAIDI	238.52	228.30	267.25	236.64	251.09	244.36	15.17	259.53	259.53	244.36	231.4	209.92
SAIFI	2.15	2.11	2.41	2.51	2.24	2.29	0.17	2.46	2.46	2.29	2.52	2.21
<b>WPCo</b>	<b>2016</b>	<b>2017</b>	<b>2018</b>	<b>2019</b>	<b>2020</b>	<b>Ave</b>	<b>STDEV</b>	<b>1 STDEV</b>	<b>Min Target</b>	<b>Optimal Target</b>	<b>Min Target</b>	<b>Optimal Target</b>
SAIDI	345.46	644.98	627.13	476.40	544.69	527.73	122.24	649.97	649.97	527.73	387.64	320.3
CAIDI	205.09	291.05	266.49	222.69	271.49	251.36	35.96	287.32	287.32	251.36	223.52	196.28
SAIFI	1.68	2.22	2.35	2.14	2.01	2.08	0.25	2.33	2.33	2.08	1.85	1.58

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CERTIFICATE OF SERVICE

I, William C. Porth, counsel for Appalachian Power Company and Wheeling Power Company, do hereby certify that true copies of the foregoing filing were served by U.S. Mail on this 4<sup>th</sup> day of February, 2021 addressed to the following:

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