BEFORE THE
ARKANSAS PUBLIC SERVICE COMMISSION

IN THE MATTER OF A NOTICE OF INQUIRY
REGARDING A RULEMAKING FOR
DEVELOPING AND IMPLEMENTING ENERGY
EFFICIENCY PROGRAMS

DOCKET NO. 06-004-R

SOUTHWESTERN ELECTRIC POWER COMPANY
REPLY COMMENTS ON THE PROPOSED ENERGY EFFICIENCY
GUIDELINES

Southwestern Electric Power Company ("SWEPCO" or "Company"), an operating subsidiary of American Electric Power Company, Inc. ("AEP"), submits these Reply Comments to the Initial Comments regarding the proposed Energy Efficiency Guidelines ("Guidelines") submitted by the various parties to the docket on November 21, 2006.

Many of the opinions and suggestions presented in the Initial Comments of various parties appear to be restatements or enhancements of previously stated opinions. The comments also include a few original opinions, as well as items related to clarifying the draft guidelines. While SWEPCO does not agree with or support many of the restated arguments presented by other parties, we are of the opinion that we have sufficiently presented our position in writing and also in person at the many collaborative meetings. SWEPCO put forth its initial position on many of the issues addressed by the various parties in our filing made March 24, 2006, further clarified certain opinions in our Initial Response to Attachment A made October 24, 2006, and further reinforced our position in our Initial Comments regarding the proposed Energy Efficiency Guidelines filed November 17, 2006. Therefore, we do not see the need to state our position, once again, in the form of Reply Comments. We will be available to provide clarification of
our position, should it be needed by the Commission or others, at the hearing to be held December 13, 2006.

Respectfully submitted

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CERTIFICATE OF SERVICE

I, David R. Matthews, attorney for Southwestern Electric Power Company, state that I have on this 5th day of December, 2006, provided a true and correct copy of the above and foregoing instrument to all attorneys of record, either electronically or in the United States mail, postage prepaid.

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