



AMERICAN ELECTRIC POWER
POLITICAL ENGAGEMENT REPORT
ANNUAL 2023

American Electric Power is one of the largest electric utilities in the United States, delivering safe, reliable power to 5.6 million regulated customers in 11 states. AEP owns the nation's largest electricity transmission system, a more than 40,000-mile network that includes more 765-kilovolt extra-high voltage transmission lines than all other U.S. transmission systems combined. AEP also operates approximately 225,000 miles of distribution lines. AEP has more than 30,000 megawatts of diverse generating capacity (owned and PPA), including more than 7,100 megawatts of renewable energy.

American Electric Power works to help shape the legal and regulatory framework that applies to our rapidly evolving industry through routine, constructive engagement with government officials, policymakers, and stakeholder groups. Where permitted by law, AEP may contribute corporate funds to state and local candidates, parties, committees, ballot measures, and political organizations. Corporate contributions in support of candidates and entities reflect the Company's overall business interests. When contributions are made, they are done so without respect to either political party affiliation or private political preferences of any individual director, officer, or employee of AEP. No contribution will be given in anticipation of, in recognition of, or in return for any official act, and all corporate political contributions are disclosed.

AEP also interacts with trade associations and advocacy groups that indirectly support the corporation's policy goals. Our relationships with regulators and legislators, and our partnerships with advocacy organizations, are imperative to meeting customer demand for new, innovative solutions. We leverage our expertise and experience to educate regulators and key stakeholders about emerging technologies and associated issues.

Corporate Political Contributions

In accordance with our Political Engagement Policy, all requests for Corporate Political Contributions must be reviewed and approved by AEP's Chief Compliance Officer – Political Engagement in advance, to ensure compliance with all applicable federal, state, and local laws, rules, and regulations, and AEP's Political Engagement Policy. In addition, all requests for Corporate Political Contributions are reviewed and approved by the appropriate AEP Executive Approver(s) in advance of payment.



For the period of January 1 through December 31, 2023, AEP made the following Corporate Political Contributions:

American Electric Power - Virginia – Committee for Responsible Government	\$ 200,000
Democratic Governors Association	\$ 100,000
National Governors Association Center for Best Practices	\$ 100,000
Majority Fund (Oklahoma)	\$ 40,000
Senate Majority Fund (Oklahoma)	\$ 40,000
Republican State Leadership Committee	\$ 35,000
Republican Attorneys General Association (RAGA)	\$ 25,000
NCSL Foundation for State Legislatures	\$ 25,000
Communities for the Library	\$ 25,000
The US Association of Former Members of Congress	\$ 15,000
GOPAC	\$ 10,000
Midwestern Governors Association	\$ 10,000
Building Our Children's Future	\$ 10,000
National Conference of State Legislatures	\$ 6,000
Southern States Energy Board	\$ 5,000
OneTeamLA	\$ 4,750
Women’s Congressional Staff Foundation	\$ 2,500
Friends of Dr. Craig Greene, LLC	\$ 1,000
Louisiana First Fund	\$ 250

Trade Association Lobbying and Political Expenditures

AEP belongs to various trade groups and other organizations that represent a broad spectrum of views on industry and policy issues. While we don’t always agree with all of the views of these groups, we find value in having a seat at the table when key industry issues are being



discussed. Many of these trade associations are politically active in their own right, on behalf of the utility industry or broader business interests. The Internal Revenue Code requires trade associations to inform contributors of the portion of annual dues, if any, attributable to lobbying or political expenditures. For those trade associations to which AEP pays dues of \$25,000 or more each year, we voluntarily disclose that portion of such dues not deductible under the Internal Revenue Code, as reported to us by the organization.

For the period covering January 1 through December 31, 2023, those amounts are as follows:

Edison Electric Institute	\$ 509,895
Association of Electric Companies of Texas (AECT)	\$ 262,500
United States Chamber of Commerce	\$ 105,000
Business Roundtable	\$ 84,000
Nuclear Energy Institute	\$ 52,005
American Clean Power	\$ 46,250
National Association of Manufacturers	\$ 44,861
Indiana Energy Association Inc.	\$ 39,521
Ohio Chamber of Commerce	\$ 15,000
Kentucky Chamber of Commerce	\$ 10,620
Columbus Partnership	\$ 8,800
Clean Affordable Reliable Electricity Coalition	\$ 8,000
West Virginia Chamber of Commerce	\$ 7,580
Indiana Manufacturers Association	\$ 7,474
Indiana Chamber of Commerce	\$ 7,380
National Hydropower Association Inc.	\$ 6,006
Columbus Chamber	\$ 3,832
Utilities Technology Council	\$ 2,063
Tulsa Regional Chamber	\$ 1,842
Greater Fort Wayne Chamber of Commerce	\$ 1,000
Experience Columbus	\$ 750



Social Welfare Contributions

Social Welfare Organizations may engage in political activities using contributions we make. In accordance with AEP's Political Engagement Policy, every request for a Social Welfare Contribution is reviewed and approved by AEP's Chief Compliance Officer – Political Engagement and by appropriate AEP Executive Approver(s) before a contribution can be made.

While Social Welfare Organizations are not required by law to identify their contributors, AEP discloses its contributions of \$5,000 or more to Social Welfare Organizations voluntarily.

For the period covering January 1 through December 31, 2023, AEP made the following Social Welfare Contributions of \$5,000 or more:

The Ripon Society	\$ 33,500
Texas Taxpayers and Research Association	\$ 25,000
Human Rights Campaign	\$ 15,000
Public Affairs Council	\$ 12,900
Charleston Area Alliance	\$ 10,012
Oklahoma Speaker's Ball, Inc.	\$ 10,000
Shale Crescent USA	\$ 6,435
Greater Laredo Development Foundation	\$ 6,000
Mason County Development Authority	\$ 5,000
Summer Motion, Inc.	\$ 5,000
The Energy Council	\$ 5,000
Virginia Forever	\$ 5,000

Definitions

For purposes of this report, AEP uses the same definitions that are found in AEP's [Political Engagement Policy](#).

"AEP" means American Electric Power and any of its operating companies or subsidiaries, including AEP Ohio, AEP Texas, Appalachian Power, AEP Appalachian Power, Indiana Michigan Power, Kentucky Power, Public Service Company of Oklahoma, Southwestern Electric Power Company, AEP Transmission Holding Company and its subsidiaries, and AEP Energy and its



subsidiaries. It does not include any AEP-affiliated political action committees or separate segregated funds.

“Chief Compliance Officer – Political Engagement” means the representative within the AEP legal department designated by AEP’s Chief Compliance Officer to review and approve requests subject to this Policy.

“Corporate Political Contribution” means a contribution of corporate funds or in-kind¹ contributions of goods or services by AEP to any Political Entity or any Independent Expenditure made with corporate funds.

“Executive Approver” means the individual or individuals identified below as having the authority to review and approve requests subject to this Policy by AEP’s approved process for implementing this Policy.

Requesting Entity	Payments ≤ \$ 1000	Payments > \$ 1000	Payments > \$ 10,000	Payments > \$ 50,000
Operating Companies	Operating Company Leader with sufficient financial authority ²	Operating Company Director or Vice President of External Affairs (or similar title) ³	Operating Company President/COO and AEP Executive Vice President of Government Affairs (or similar title) ³	AEP Chief Executive Officer
Business Units	Business Unit Leader with sufficient financial authority ²	Director or Vice President with relevant oversight of Business Unit function (or similar title) ³	AEP Senior Vice President with relevant oversight of Business Unit function and AEP Executive Vice President of Government Affairs (or similar title) ³	AEP Chief Executive Officer

¹ In-kind contributions include efforts made by AEP employees in an official capacity on behalf of AEP to raise funds or garner support for Political Entities during working hours. While AEP employees are permitted to personally support whatever Political Entities they choose, in whatever manner they choose – through financial contributions or by donating their time -- all such personal contributions or volunteer activity must be done outside of work hours. Use of company time or resources in furtherance of such personal support is a violation of this Policy.

² Typically, this will be the direct supervisor of the individual making the request.

³ Official titles may vary within an Operating Companies or Business Unit.



“Government Official” means any official, officer, employee, or representative of, or any person acting in an official capacity for or on behalf of, any governmental entity (including federal, state, local, or municipal government department or agency), whether elected, appointed, retained, or otherwise employed, when that individual’s role or position involves oversight of or influence over AEP’s interests. This definition also includes any political party or party official or candidate for political office; and any company, business, enterprise, or other entity owned, in whole or in part, or controlled by any person described above.

“Independent Expenditure” means a political campaign communication (e.g., newspaper or TV ad, direct mailing, website) that expressly advocates for the election or defeat of a clearly identified candidate or ballot issue and that is not made in cooperation, consultation, or concert with or at the request or suggestion of a candidate, candidate’s authorized committee or political party.

“Political Entity” is any of the following:

- Individual candidates for state or local office
- Political action committees
- State and local political parties and party committees
- Groups organized under Section 527 of the Internal Revenue Code (including but not limited to the following: Republican Governors Association, Democratic Governors Association, Republican Attorneys General Association, Democratic Attorneys General Association)
- State or local ballot initiatives or referenda
- Groups, regardless of their organizational structure, that may be considered political in nature in light of the inclusion of terms like “legislative,” “democratic,” “republican,” “government,” or similar terms in their name (e.g., National Conference of State Legislatures, Council of State Governments) or that are known to be political in nature by the individual making the request for contribution
- Independent expenditure-only committees (“Super PACs”) that engage in Independent Expenditures

Contributions labeled as “memberships” or “sponsorships,” if made to one of the above Political Entities, are nevertheless “Corporate Political Contributions” subject to this Policy. Any and all Corporate Political Contributions made by AEP must comply with all applicable federal and state laws, rules and regulations and this Policy. If the applicability of this Policy to any proposed contribution is unclear, the proposed contributor shall seek the review and, if deemed necessary, approval of the Chief Compliance Officer – Political Engagement before making such contribution.



“Political Activities” means activities that are conducted to support a Government Official or Political Entity and can include both direct or in-kind contributions (which include the use of corporate facilities, services, materials, or employee time) and events to solicit contributions (i.e., fundraisers).

“Social Welfare Contribution” means any contribution of corporate funds or in-kind contribution of goods or services by AEP to any Social Welfare Organization.

“Social Welfare Organization” is any organization not organized for profit but operated exclusively for the promotion of social welfare, operating under section 501(c)(4) of the Internal Revenue Code.