

**COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION**

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COMMISSION

In the Matter of:

**THE APPLICATION FOR A GENERAL)
ADJUSTMENT OF ELECTRIC RATES)
OF KENTUCKY POWER COMPANY)**

Case No. 2013-00197

SECTION VI

DIRECT TESTIMONY OF

**REITTER, STEGALL, VAUGHAN AND WOHNHAS
ON BEHALF OF KENTUCKY POWER COMPANY**

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

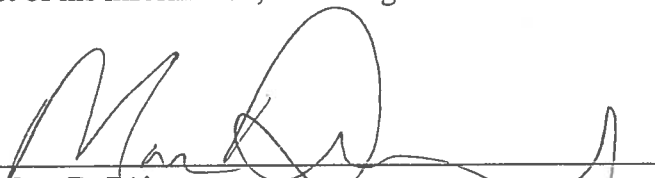
In the Matter of:

THE APPLICATION FOR A GENERAL)
ADJUSTMENT OF ELECTRIC RATES) Case No. 2013-00197
OF KENTUCKY POWER COMPANY)

DIRECT TESTIMONY OF
MARC D. REITTER
ON BEHALF OF KENTUCKY POWER COMPANY

VERIFICATION

The undersigned, Marc D. Reitter, being duly sworn, deposes and says he is the Manager, Corporate Finance for American Electric Power Service Corporation and that he has personal knowledge of the matters set forth in the forgoing testimony and the information contained therein is true and correct to the best of his information, knowledge and belief.



Marc D. Reitter

STATE OF OHIO

)

) Case No. 2013-00197

County of FRANKLIN

)

Subscribed and sworn to before me, a Notary Public in and before said County and State, by Marc D. Reitter, this the 17th day of June, 2013.



JOSEPHINE CONER
Notary Public, State of Ohio
My Commission Expires 09-20-16



Notary Public

My Commission Expires: 09-20-2016



DIRECT TESTIMONY OF
MARC D REITTER, ON BEHALF OF
KENTUCKY POWER COMPANY
BEFORE THE PUBLIC SERVICE COMMISSION OF KENTUCKY

CASE NO. 2013-00197

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**DIRECT TESTIMONY OF
MARC D REITTER, ON BEHALF OF
KENTUCKY POWER COMPANY
BEFORE THE PUBLIC SERVICE COMMISSION OF KENTUCKY**

I. INTRODUCTION

1 **Q: PLEASE STATE YOUR NAME, BUSINESS ADDRESS AND POSITION.**

2 A: My name is Marc D. Reitter. My business address is 1 Riverside Plaza, Columbus,
3 Ohio 43215. I am employed by American Electric Power Service Corporation
4 (AEPSC) as Manager of Corporate Finance. AEPSC, a wholly owned subsidiary of
5 American Electric Power Company, Inc. (AEP), provides centralized professional
6 and other services to subsidiaries of AEP. AEP is the parent company of Kentucky
7 Power Company (Kentucky Power or Company) and AEPSC is Kentucky Power's
8 services provider company.

II. BACKGROUND

9 **Q: PLEASE SUMMARIZE YOUR EDUCATIONAL BACKGROUND AND**
10 **BUSINESS EXPERIENCE.**

11 A: I earned a Bachelor of Science in Business Administration as a Finance major from
12 Arizona State University in 2000. I earned a Master of Business Administration
13 from the Fisher College of Business at The Ohio State University in 2007. In
14 January 2002, I was hired by AEPSC as an analyst in its AEP Texas Retail Group. I
15 transferred to the Utility Group Business Services in December 2002 as a financial
16 analyst. In December 2004, I was promoted to the Strategic Initiatives Group as a

1 financial analyst. In February 2007, I transferred into the Corporate Finance Group
2 as a financial analyst and progressed to my current position in February 2010.

3 **Q: WHAT ARE YOUR RESPONSIBILITIES AS MANAGER OF CORPORATE**
4 **FINANCE?**

5 A: My responsibilities include planning and executing the corporate finance programs
6 of the regulated operating companies in the AEP System, including Kentucky
7 Power. I am also responsible for preparing dividend payment recommendations for
8 the companies in the AEP System, establishing capitalization targets, and managing
9 the relationships of AEP and its subsidiaries with the credit rating agencies.

10 **Q: HAVE YOU PREVIOUSLY TESTIFIED BEFORE THIS COMMISSION?**

11 A: Yes. I testified before the Public Service Commission of Kentucky Case No. 2009-
12 00459 on behalf of Kentucky Power.

13 **Q: HAVE YOU PREVIOUSLY SUBMITTED TESTIMONY IN ANY OTHER**
14 **REGULATORY PROCEEDINGS?**

15 A: Yes. I have submitted testimony and testified before the Virginia State Corporation
16 Commission in Docket No. PUE-2011-00037 on behalf of Appalachian Power
17 Company (APCO), an AEP operating company. In addition, I have submitted
18 testimony and testified on behalf of APCO before the Public Service Commission
19 of West Virginia in Docket No. 10-0699-E-42T. I have also submitted testimony
20 before the Michigan Public Service Commission in Docket No. U-16801 on behalf
21 of Indiana Michigan Power Company, an operating company of AEP and most
22 recently submitted testimony and testified before the Public Utility Commission of

1 Texas in Docket No. 40443 on behalf of Southwestern Electric Power Company,
2 another operating company of AEP.

III. PURPOSE OF TESTIMONY

3 Q: **WHAT IS THE PURPOSE OF YOUR TESTIMONY IN THIS**
4 **PROCEEDING?**

5 A: The purpose of my testimony is to support certain historical and adjusted data
6 incorporated in this application. I will sponsor Kentucky Power's proposed capital
7 structure and cost of capital for ratemaking purposes, employing the cost of
8 common equity, supported by Company witness Avera.

9 Q: **ARE YOU SPONSORING ANY SCHEDULES INCLUDED IN THE**
10 **COMPANY'S FILING?**

11 A: Yes. I am sponsoring the following Section V schedules and workpapers:

- 12 • Section V Workpaper S-2 Page 1 of 3
- 13 • Section V Schedule 3 (Columns 3-5)
- 14 • Section V Workpaper S-3 Pages 1 and 2

15 Q: **ARE YOU SPONSORING ANY EXHIBITS TO YOUR TESTIMONY?**

16 A: Yes. I am sponsoring the following exhibit:

- 17 • Exhibit MDR-1

18 Q: **WERE THE SCHEDULES AND EXHIBIT PREPARED BY YOU OR**
19 **UNDER YOUR DIRECTION?**

20 A: Yes.

IV. PROPOSED CAPITAL STRUCTURE AND COST OF CAPITAL

1 **Q: WHAT IS KENTUCKY POWER'S PROPOSED COST OF CAPITAL FOR**
2 **RATEMAKING PURPOSES?**

3 A: Section V, Workpaper S-2, page 1 of 3 provides Kentucky Power's proposed
4 capital structure and after-tax weighted average cost of capital of 8.08%.

5 **Q: DOES THE COMPANY'S PROPOSED COST OF CAPITAL INCLUDE**
6 **ADJUSTMENTS MADE TO THE MARCH 31, 2013 PER BOOKS CAPITAL**
7 **STRUCTURE TO REFLECT THE ASSET TRANSFER AND ASSUMPTION**
8 **TRANSACTION?**

9 A. Yes.

10 **Q: PLEASE SUMMARIZE THE COMPANY'S EXPECTATION REGARDING**
11 **KENTUCKY POWER'S CAPITALIZATION AS A RESULT OF THE**
12 **ASSET TRANSFER AND ASSUMPTION TRANSACTION.**

13 A. The Company as described in its application for approval of an undivided fifty
14 percent interest in the Mitchell Generating Station and associated assets and
15 liabilities, Case No. 2012-00578, expects to recapitalize Kentucky Power to restore
16 its debt to total capitalization ratio to a level approximating the capitalization level
17 prior to the Asset Transfer and Assumption Transaction.

18 **Q: WHY IS THE CAPITALIZATION LEVEL PRIOR TO THE ASSET**
19 **TRANSFER AND ASSUMPTION TRANSACTION APPROPRIATE?**

20 A. It was never the intent of the asset transfer and assumption transaction to drive
21 Kentucky Power's capitalization and resulting cost of capital. The pre-asset
22 transfer capital structure of approximately fifty-five percent total debt to total

1 capitalization is consistent with the credit rating agencies criteria for investment
2 grade credit ratings. Furthermore, as illustrated in Exhibit MDR-1, the
3 recapitalization adjustments to the per books March 31, 2013 capital structure
4 benefit Kentucky Power's customers by lowering the cost of long-term debt by
5 0.50%. As a result of the adjustment to the debt component and reducing the equity
6 balance by a recapitalization dividend of approximately \$90 million from Kentucky
7 Power to AEP, results in a lower overall cost of capital by 0.23% from 8.31% to
8 8.08%.

9 **Q: PLEASE EXPLAIN HOW THE PROPOSED AFTER-TAX WEIGHTED**
10 **AVERAGE COST OF CAPITAL OF 8.08% WAS CALCULATED.**

11 A. The overall cost of capital is based on a weighting of the costs for the Company's
12 sources of capital, including long-term debt, short-term debt, common stock,
13 accounts receivable financing, and investment tax credits. The Company started
14 with the Reapportioned Kentucky Jurisdiction capital as calculated on Section V
15 Schedule 3 Column 13 for each category of capital. Next, as illustrated on Section
16 V, Workpaper S-2 page 1 of 3, the Company divided the dollar amount of each
17 component of capital by the Company's total dollar amount of capital to derive the
18 percentage of the Company's total capital each component represents.

19 **Q: PLEASE EXPLAIN WHAT RATES WERE USED IN CALCULATING THE**
20 **COMPANY'S PER BOOKS WEIGHTED AVERAGE COST OF CAPITAL**
21 **AS OF MARCH 31, 2013.**

22 A. The weighted cost of long-term debt was determined by taking the sum of each
23 bond's actual annualized cost and dividing this amount by the total net proceeds

1 outstanding as of March 31, 2013. The annualized cost for each bond was
2 calculated by multiplying the effective cost rate (yield to maturity) by the net
3 proceeds outstanding. The effective cost rate, or yield to maturity, is the bond's
4 yield expressed as an annual rate in relation to the face value of the bond. As such,
5 a bond's annualized cost is calculated by multiplying the yield to maturity by the
6 face value of the bond. The sum of the annualized costs is then divided by the total
7 net proceeds outstanding to determine the weighted cost of the long-term debt
8 portfolio.

9 The Cost of short-term debt used in the calculation was the Company's
10 actual short-term interest expense for the twelve months ended March 31, 2013
11 divided by the actual average borrowings outstanding during the same time period.
12 Please refer to Section V, Workpaper S-3, pages 1 and 2 of 4.

13 The cost of accounts receivable financing used in the derivation of the
14 weighted average cost of capital was calculated by using a thirteen month average
15 cost experienced by the Company during the test year.

16 The cost of common equity used in the calculation is the amount
17 recommended by Witness Avera.

18 **Q: DID THE COMPANY MAKE ANY PROFORMA ADJUSTMENTS TO THE**
19 **DEBT AND EQUITY COMPONENTS OF THE COMPANY'S PER BOOKS**
20 **CAPITAL STRUCTURE AS OF MARCH 31, 2013?**

21 A. Yes. The Company made recapitalization adjustments to Long-term debt and
22 Equity. Please reference Section V, Workpaper S-3, page 1 of 4.

1 **Q: PLEASE EXPLAIN THE PROFORMA ADJUSTMENTS MADE TO THE**
2 **DEBT COMPONENT OF THE COMPANY'S PER BOOKS CAPITAL**
3 **STRUCTURE AS OF MARCH 31, 2013.**

4 A. As a result of the Asset Transfer and Assumption Transaction, the Company
5 anticipates new long-term debt in the approximate amount of \$290 million: \$225
6 million in newly issued indebtedness and \$65 million in assuming existing tax-
7 exempt indebtedness. As part of the Company's Asset Transfer Application Case
8 No. 2012-00578 the Company is seeking approval for the rights and liabilities
9 connected with the West Virginia Economic Development Authority (WVEDA)
10 \$65 million Series 2008A Pollution Control Revenue Bond to be assumed by
11 Kentucky Power. These bonds were used to partially finance certain environmental
12 equipment constructed at the Mitchell Generating Station. The interest payable on
13 these bonds is generally excludable from the Federal Income Taxes of the holder of
14 such bonds. As a result, such bonds generally have lower interest rates than other
15 non-exempt bonds and, therefore, are generally lower-cost sources of capital for
16 issuers such as the Company. Collectively, the total pro forma debt adjustment
17 made to the March 31, 2013 per books debt balance is \$290 million of long-term
18 debt as illustrated on Section V, Schedule 3, Column 4.

19 **Q: PLEASE DESCRIBE THE RATES USED FOR THE ADJUSTMENTS**
20 **MADE TO THE DEBT COMPONENT OF THE COMPANY'S PER BOOKS**
21 **CAPITAL STRUCTURE AS OF MARCH 31, 2013.**

22 A. For the projected \$225 million debt issuance, the Company used the implied
23 forward 30-year U.S. Treasury rate of 3.607% for June 2014 from Bloomberg to

1 establish the benchmark basis then we added a credit spread of 1.50% or 150 basis
2 points to reflect the estimated return a bond investor would require given Kentucky
3 Power's credit profile. The estimated coupon for the bond issuance of 5.107% is
4 illustrated on Section V, Workpaper S-3 page 1 of 4.

5 The rate applied to the WVEDA \$65 million pollution control revenue
6 bond is 4.50%. The Company relied on certain banks with tax-exempt market
7 expertise to forecast the rate to fix these bonds to their 2036 maturity date.

8 **Q: PLEASE DESCRIBE THE BASIS OF THE CREDIT SPREAD**
9 **ASSUMPTION OF 1.50% FOR THE NEW DEBT ISSUANCE MENTIONED**
10 **ABOVE.**

11 A. The Company's most recent long-term debt offering was its private placement in
12 May 2009. The 30-year tranche of this transaction resulted in a credit spread of
13 3.60% over the 30-year U.S. Treasury benchmark rate. Recently, Kentucky
14 Power's sister company AEP Texas North Company (TNC) issued debt in the
15 private placement market in January of 2013. The TNC deal resulted in a credit
16 spread on the 30-year tranche of 1.45%. The market sentiment and investor
17 demand at the time of the debt issuance together with the Company's underlying
18 credit profile will ultimately drive the credit spread of the Company's forecasted
19 debt offering. Therefore, the Company used the TNC market comparable as the
20 basis for the credit spread assumption of 1.50%.

21 **Q: PLEASE DISCUSS THE TIMING OF THE NEW LONG-TERM DEBT TO**
22 **BE ISSUED DUE TO THE ASSET TRANSFER AND ASSUMPTION**
23 **TRANSACTION.**

1 A. The new long-term debt will be issued by Kentucky Power within approximately
2 six months of the closing of the Transfer and Assumption Transaction if the debt
3 capital markets are available to Kentucky Power. The Company will seek all the
4 necessary approvals for any financing activities subsequent to the Transfer and
5 Assumption Transaction.

6 **Q: TO RESTORE THE COMPANY'S CAPITALIZATION LEVEL TO A**
7 **LEVEL REPRESENTATIVE OF THE LEVEL PRIOR TO THE ASSET**
8 **TRANSFER AND ASSUMPTION TRANSACTION, HOW IS THE EQUITY**
9 **COMPONENT OF THE CAPITAL STRUCTURE TO BE ADJUSTED?**

10 A. As a result of the paid in capital associated with the transfer and assumption of the
11 fifty percent undivided interest in the Mitchell Generating Station, the Company
12 adjusted the post asset transfer equity balance by approximately \$90 million
13 through a recapitalization dividend from Kentucky Power to AEP. As a result of
14 this dividend, Kentucky Power's equity balance and overall capitalization is
15 restored to a level representative of before the asset transfer and assumption
16 transaction.

17 **Q: DOES THIS CONCLUDE YOUR DIRECT TESTIMONY?**

18 A. Yes.

**KENTUCKY POWER COMPANY
PER BOOKS COST OF CAPITAL
TEST YEAR TWELVE MONTHS ENDED 3/31/2013**

Line No. (1)	<u>Description</u> (2)	Reapportioned Kentucky Jurisdictional <u>Capital 1/</u> (3)	PERCENTAGE OF <u>TOTAL</u> (4)	ANNUAL COST PERCENTAGE <u>RATE</u> (5)		AFTER-TAX WEIGHTED AVERAGE COST <u>PERCENT</u> (6) = (4) X (5)
1	Long Term Debt	\$538,454,314	51.21%	6.48%	2/	3.32%
2	Short Term Debt	(11,512,444)	-1.10%	0.30%	3/	0.00%
3	Accounts Receivable Financing 4/	44,571,857	4.24%	2.99%	5/	0.13%
4	Common Equity	480,046,707	45.65%	10.65%	6/	4.86%
5	Total	<u>\$1,051,560,434</u> =====	<u>100.00%</u> =====			<u>8.31%</u> =====

**KENTUCKY POWER COMPANY
PROPOSED ADJUSTED TEST YEAR COST OF CAPITAL
TWELVE MONTHS ENDED 3/31/2013**

Line No. (1)	<u>Description</u> (2)	Reapportioned Kentucky Jurisdictional <u>Capital 1/</u> (3)	PERCENTAGE OF <u>TOTAL</u> (4)	ANNUAL COST PERCENTAGE <u>RATE</u> (5)		AFTER-TAX WEIGHTED AVERAGE COST <u>PERCENT</u> (6) = (4) X (5)
1	Long Term Debt	\$825,556,993	52.11%	5.98%	2/	3.12%
2	Short Term Debt	(11,511,357)	-0.73%	0.30%	3/	0.00%
3	Accounts Receivable Financing 4/	44,567,648	2.81%	2.99%	5/	0.08%
4	Common Equity	725,567,150	45.80%	10.65%	6/	4.88%
5	Total	<u>\$1,584,180,434</u> =====	<u>100.00%</u> =====			<u>8.08%</u> =====
Benefit to Customers						0.23%

1/ Schedule 3, Column 12, Lines 1, 2, 3 & 4

2/ Per workpaper "Cost of Debt"

3/ Per workpaper "Short Term Debt"

4/ Per Commission Order March 31, 2003 Case No. 2002-00169

5/ 13 Month Average Accounts Receivable Balance and 13 Month Average Annual Cost of Carry

6/ Per Recommendation of William Avera



COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

**THE APPLICATION FOR A GENERAL)
ADJUSTMENT OF ELECTRIC RATES) Case No. 2013-00197
OF KENTUCKY POWER COMPANY)**

DIRECT TESTIMONY OF

JASON M. STEGALL

ON BEHALF OF KENTUCKY POWER COMPANY

VERIFICATION

The undersigned, Jason M. Stegall, being duly sworn, deposes and says he is the a Regulatory Consultant for American Electric Power Service Corporation and that he has personal knowledge of the matters set forth in the forgoing testimony and the information contained therein is true and correct to the best of his information, knowledge and belief.

Jason M. Stegall
Jason M. Stegall

STATE OF OHIO)
) Case No. 2013-00197
County of FRANKLIN)

Subscribed and sworn to before me, a Notary Public in and before said County and State, by Jason M. Stegall, this the 18 day of June, 2013.

Ellen A. McAninch
Notary Public

My Commission Expires: May 11th, 2016



ELLEN A. MCANINCH
NOTARY PUBLIC
STATE OF OHIO
Recorded in
Franklin County
My Comm. Exp. 5/11/16

**DIRECT TESTIMONY OF
JASON M. STEGALL, ON BEHALF OF
KENTUCKY POWER COMPANY
BEFORE THE PUBLIC SERVICE COMMISSION OF KENTUCKY**

CASE NO. 2013-00197

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**DIRECT TESTIMONY OF
JASON M. STEGALL, ON BEHALF OF
KENTUCKY POWER COMPANY
BEFORE THE PUBLIC SERVICE COMMISSION OF KENTUCKY**

I. INTRODUCTION

1 **Q. PLEASE STATE YOUR NAME, POSITION AND BUSINESS ADDRESS.**

2 A. My name is Jason M. Stegall. My business address is 1 Riverside Plaza,
3 Columbus, Ohio. I currently hold the position of Regulatory Consultant in the
4 Regulated Pricing and Analysis department for the American Electric Power
5 Service Corporation (AEPSC), a subsidiary of American Electric Power
6 Company, Inc. (AEP). AEP is the parent company of Kentucky Power Company
7 (Kentucky Power or Company) and AEPSC is Kentucky Power's services
8 provider company.

II. BACKGROUND

9 **Q. PLEASE SUMMARIZE YOUR BACKGROUND AND EMPLOYMENT**
10 **HISTORY.**

11 A. In May 1997, I received a Bachelor of Science Degree in Accounting from
12 Virginia Polytechnic Institute and State University. In August 2011, I received a
13 Master's Degree in Business Administration from the Ohio State University.

14 In June 1997, I joined AEPSC as an Accountant in the Regulated
15 Accounting Division of the Accounting Department. In July 2009, I joined the
16 Regulatory Services Department as a Regulatory Consultant. From July 2009
17 through June 2010, I performed duties as a Regulatory Consultant in Customer
18 and Distribution Services Support under the Regulatory Services Department,

1 where I was responsible for assisting customer services and distribution services
 2 witnesses in regulatory proceedings by supporting testimony preparation,
 3 providing research in support of the discovery process, and compiling data for
 4 regulatory filings. In July 2010, I joined Regulated Pricing & Analysis under the
 5 Regulatory Services Department as a Regulatory Consultant, where my
 6 responsibilities include preparation of cost-of-service studies, rate design and
 7 tariff provisions for the AEP operating companies.

8 **Q. HAVE YOU PREVIOUSLY TESTIFIED IN ANY REGULATORY**
 9 **PROCEEDINGS?**

10 A. Yes. I have submitted testimony before the Indiana Utility Regulatory
 11 Commission and the Michigan Public Service Commission regarding cost-of-
 12 service and rate design.

III. PURPOSE OF DIRECT TESTIMONY

13 **Q. WHAT IS THE PURPOSE OF YOUR DIRECT TESTIMONY IN THIS**
 14 **PROCEEDING?**

15 A. The purpose of my testimony is to support two test year revenue adjustments, to
 16 address the allocation of the requested rate increase to Kentucky Power's
 17 customer classes, and to support and describe the development of the Company's
 18 Class Cost-of-Service Study.

19 **Q. WHAT EXHIBITS ARE YOU SPONSORING IN THIS PROCEEDING?**

20 A. I am sponsoring the following exhibits:

- | | | |
|----|---------------|-----------------------------------|
| 21 | Exhibit JMS-1 | Customer Annualization Adjustment |
| 22 | Exhibit JMS-2 | Class Cost-of-Service Study |
| 23 | Exhibit JMS-3 | Revenue Allocation |

IV. REVENUE ADJUSTMENTS

1 **Q. ARE YOU RESPONSIBLE FOR THE DEVELOPMENT OF THE**
2 **CUSTOMER MIGRATION ADJUSTMENT?**

3 A. Yes.

4 **Q. PLEASE DESCRIBE THE ADJUSTMENT.**

5 A. The purpose of the customer migration adjustment is to determine the test year
6 revenue that Kentucky Power would have received if each customer were billed
7 for the entire twelve months of the test year on the tariff under which the
8 customer was taking service at the end of the test year. For example, a customer
9 may have been billed under the MGS (Medium General Service) tariff for the first
10 seven months of the test year and then billed under the LGS (Large General
11 Service) tariff for the remaining five months of the test year. During the test year,
12 over 900 customers changed tariffs.

13 The Customer Migration Adjustment starts with the “per books revenue”
14 as shown in Section III. “Per books revenues” means the revenues from
15 customers as they were actually billed for each month of the test year. For
16 purposes of the Customer Migration Adjustment, these customers would be re-
17 billed for the entire test year under the tariff as applied at the end of the test year
18 to determine the impact on test year revenues. This restatement of per books
19 revenue was made for each customer who switched tariffs during the test year.

20 **Q. WHAT IMPACT DOES THE CUSTOMER MIGRATION ADJUSTMENT**
21 **HAVE ON TEST YEAR REVENUES?**

1 A. The Customer Migration Adjustment results in an increase of test year revenues
2 of \$5,201,095 as shown in Section V, Workpaper S-4, page 22.

3 **Q. DOES THE CUSTOMER MIGRATION ADJUSTMENT INCLUDE ANY**
4 **AMOUNTS RELATED TO THE TRANSFER OF REAL TIME PRICING**
5 **(RTP) CUSTOMERS BACK TO STANDARD TARIFFS?**

6 A. Yes, the \$5,201,095 includes the adjustment made to transfer the RTP customers
7 back to standard tariffs. Since the transfer occurred during the test year, those
8 customers were treated as if they were billed on standard tariffs for the entire test
9 year. This resulted in a net increase in revenues of \$6,422,665.

10 **Q. ARE YOU RESPONSIBLE FOR THE DEVELOPMENT OF THE**
11 **CUSTOMER ANNUALIZATION ADJUSTMENT?**

12 A. Yes.

13 **Q. PLEASE EXPLAIN THE PURPOSE OF THE ADJUSTMENT.**

14 A. The purpose of the Customer Annualization Adjustment is to restate test year
15 revenues and expenses to reflect, on an annual basis, changes in load that
16 occurred during the test year. For example, if the number of residential customers
17 increased during the test year, per books residential kWh sales would have to be
18 increased to reflect the impact of annualizing load growth that occurred within the
19 test year. In addition to the revenue adjustment, test year operating expenses
20 would also have to be increased to reflect the incremental costs associated with
21 annualizing test year load growth.

22 **Q. PLEASE DESCRIBE THE ADJUSTMENT.**

1 A. The development of the Customer Annualization Adjustment is shown in Exhibit
2 JMS-1 with additional detail shown in Section III of this filing. To ensure that the
3 Customer Annualization Adjustment reflects only actual customer growth, the
4 impact of customer migrations has been eliminated by starting with the data
5 adjusted for the Customer Migration Adjustment.

6 Page 1 of Exhibit JMS-1 shows specific changes in large customer loads
7 as identified by Kentucky Power. Column (1) contains Kentucky Power's current
8 tariffs listed by delivery voltage level. Column (2) contains the total number of
9 customers for the test year, while Column (3) contains the number of customers as
10 of March 31, 2013. Columns (4) and (5) show metered kWh and revenues,
11 respectively. Columns (6) through (9) show the specific adjustments for known
12 changes in large customer usage, which produces a reduction in revenue of
13 \$2,762,965. Columns (10) through (13) are the sum of the data shown in
14 Columns (2) through (5) and the adjustments shown in columns (6) through (9).
15 This information is the starting point for the second part of the Customer
16 Annualization Adjustment that is shown on page 2 of Exhibit JMS-1.

17 Column (1) of page 2 of Exhibit JMS-1 contains Kentucky Power's
18 current tariffs listed by delivery voltage level. Column (2) contains the total
19 number of customers for the test year, while Column (3) contains the average
20 number of customers for the test year [Column (2) divided by 12]. Column (4)
21 contains the number of customers as of March 31, 2013. Customer growth
22 [Column (5)] is calculated as Column (4) less Column (3).

1 Customer growth [Column (5)] is then multiplied by test year average
2 kWh per customer [Column (7)] to yield the kWh annualization adjustment
3 [Column (8)]. The kWh annualization adjustment is in turn multiplied by the test
4 year average revenue per kWh [Column (10)] to yield a revenue annualization
5 adjustment of (\$3,689,728) as shown in Column (11).

6 In addition to the \$6,452,693 decrease $((\$3,689,728) + (\$2,762,965))$ in
7 test year revenues resulting from the first two steps of the Customer
8 Annualization Adjustment, test year operating expenses must also be decreased to
9 reflect the incremental cost Kentucky Power would avoid by generating
10 102,477,893 fewer kWh $((36,233,430) + (66,244,463))$.

11 The operating ratio is simply the ratio of operation and maintenance
12 expense, less labor expense, to operating revenues. For Kentucky Power, the
13 operating ratio is 62.14%. Incremental operating expenses are then calculated by
14 multiplying the reduction in operating revenue (\$6,452,693) by the operating ratio
15 (62.25%) to yield (\$4,016,801). Incremental state and federal income taxes are
16 also deducted to yield a net Customer Annualization Adjustment of (\$2,435,892)
17 as shown in Section V, Workpaper S-4, page 23.

18 **Q. WHY IS THERE A DIFFERENCE BETWEEN THE OPERATING RATIO**
19 **CALCULATED ON PAGE 3 OF YOUR EXHIBIT AND THE OPERATING**
20 **RATIO IDENTIFIED IN SCHEDULE V, WORKPAPER S-4, PAGE 23?**

21 A. During a peer review of my exhibits, but after the rate case calculations were
22 finalized, an input error was brought to my attention. When the correction was
23 made, it resulted in an operating ratio of 62.14%.

1 **Q. PLEASE EXPLAIN THE IMPACT OF THIS DIFFERENCE.**

2 A. The net impact of this difference is to reduce the Adjusted Net Operating Income
3 reported in Section V, Schedule 4 by \$4,365. This amount is approximately
4 0.004% of the Change in Revenue Requirement identified in Section V, Schedule
5 1.

V. CLASS COST-OF-SERVICE STUDY

6 **Q. PLEASE DESCRIBE THE GENERAL PURPOSE OF A COST-OF-**
7 **SERVICE STUDY.**

8 A. A cost-of-service study is a basic analytical tool used in traditional utility rate
9 design. A cost-of-service study is used to determine the revenue requirement for
10 the services offered by the utility, and it analyzes, at a very detailed level, the
11 costs that different classes of customers impose on the utility system. A
12 completed class cost-of-service study shows the total costs the Company incurs in
13 serving each retail rate class as well as the rate of return on rate base earned from
14 each class during the test year. When the process of preparing a cost-of-service
15 study is completed and all of the costs are allocated to the customer classes, the
16 result establishes cost responsibility and makes it possible to determine rates
17 based on costs that are just and reasonable.

18 **Q. WHAT DATA SOURCE IS USED IN THE DEVELOPMENT OF A COST-**
19 **OF-SERVICE STUDY?**

20 A. The historic accounting records of Kentucky Power are used in the cost-of-service
21 studies. These accounting records are reflected in the jurisdictional cost-of-
22 service study, as shown in Section V of this filing, and in the class cost-of-service

1 study. The Company follows the Uniform System of Accounts (USOA) as
2 prescribed by FERC and adopted by this Commission. The USOA sets the
3 guidelines for recording assets, liabilities, income and expenses into various
4 accounts. The costs recorded in each FERC account are examined to verify
5 compliance with these guidelines and are typically adjusted to reflect the
6 applicable regulatory commission's policies and for known and measurable
7 changes to the test year level of expenditures.

8 **Q. AFTER THE COSTS RECORDED IN FERC ACCOUNTS ARE**
9 **EXAMINED, AND ADJUSTED WHERE APPROPRIATE, HOW ARE**
10 **THESE COSTS ASSIGNED TO EACH CUSTOMER CLASS?**

11 A. This accounting cost information is assigned to the different customer classes in a
12 way that reflects the costs of providing utility service to the various customer
13 classes. This is accomplished using a standard three-step process:
14 functionalization of costs, classification of costs, and, finally, allocation of costs.

15 **Q. PLEASE EXPLAIN THE FUNCTIONALIZATION PROCESS.**

16 A. Functionalization is the process of separating costs according to electric system
17 functions. Typically, functions in an electric utility include the following:

- 18 1) Production and Purchased Power costs,
- 19 2) Transmission costs,
- 20 3) Distribution costs,
- 21 4) Customer Service costs, and
- 22 5) Administrative and General (A&G) costs.

1 The production function includes the costs associated with power
 2 generation and power purchases and their delivery to the bulk transmission
 3 system. The transmission function consists of costs associated with the high
 4 voltage system utilized for the bulk transmission of power to and from
 5 interconnected utilities to the load centers of the utility's system. The distribution
 6 function includes the radial distribution system that connects the transmission
 7 system and the ultimate customer. The customer service function encompasses
 8 the costs associated with providing meter reading, billing and collection, and
 9 customer information and services. The A&G function is comprised of costs that
 10 may not be directly assignable to other cost functions. These costs include such
 11 items as management costs and administrative buildings. A&G costs are
 12 generally allocated to the remaining functions based on labor.

13 **Q. PLEASE EXPLAIN THE CLASSIFICATION PROCESS.**

14 A. The second step is to separate the functionalized costs into classifications of
 15 demand costs, energy costs, and customer costs.

16 Typical cost classifications used in cost studies include the following:

<u>Function</u>	<u>Classification</u>
Production	Demand, Energy
Transmission	Demand
Distribution	Demand, Customer
Customer Service	Customer

22 Demand costs are associated with the kW demand imposed by the
 23 customer. These are fixed costs which are incurred regardless of the level of

1 energy sales. An example of a demand-related cost is the investment in
2 production, transmission or distribution facilities, such as a generating unit
3 including transmission and distribution poles and lines.

4 Energy costs vary with the number of kilowatt hours used by the
5 customer. Production costs such as fuel and certain production operation and
6 maintenance expenses are energy-related since they vary with the level of sales of
7 electricity.

8 Customer costs are directly related to the number of customers served.
9 These are fixed costs which are incurred regardless of the level of energy sales.
10 Meter and customer service costs are examples of costs whose levels are fixed by
11 the number of customers.

12 The classification process provides a basis on which to allocate different
13 categories of costs (demand, energy or customer) to the Company's classes.

14 **Q. PLEASE EXPLAIN THE ALLOCATION PROCESS.**

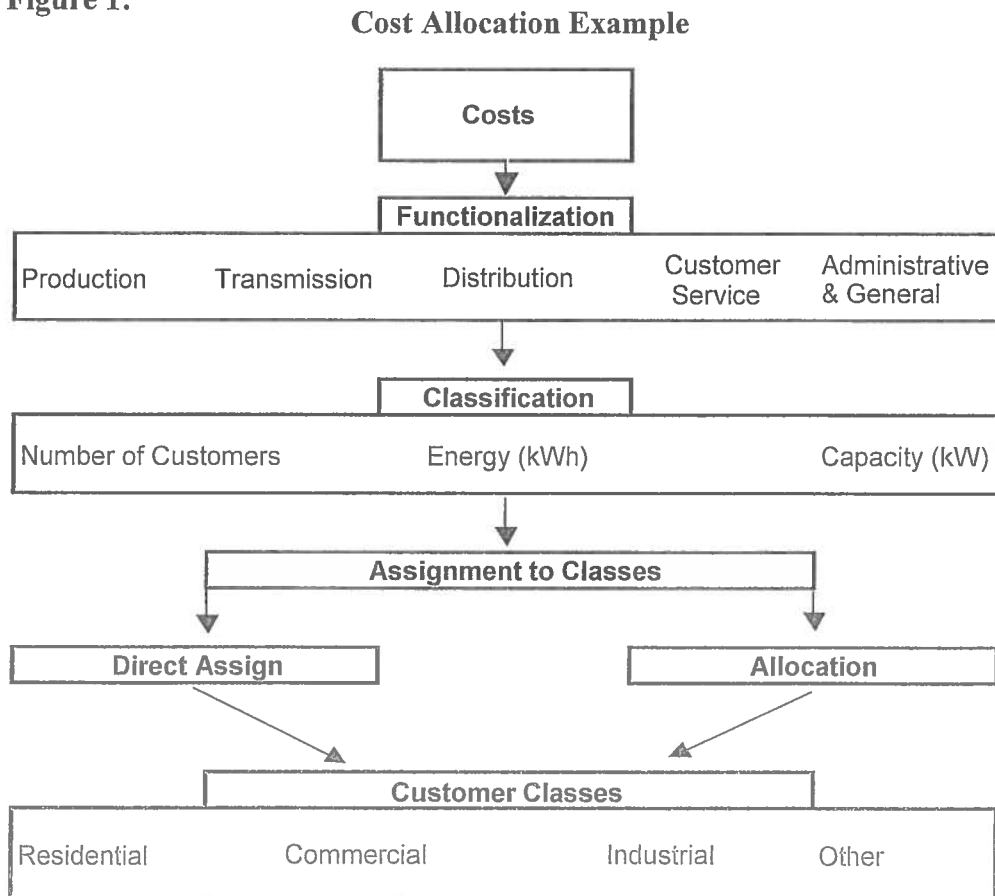
15 A. The third and final step is to allocate the functional and classified costs among the
16 classes of customers based on how the costs are incurred for each class.
17 Allocation factors are used to assign these costs to the various customer classes.
18 Customer classes are determined and grouped according to the nature of service
19 provided, voltage level and the load usage characteristics. The three principal
20 customer classes are residential, commercial, and industrial.

21 The allocation process involves multiplying the functional and classified
22 costs by the allocation factors, which results in costs assigned to each class. The
23 objective in this process is to determine a reasonable, appropriate, and

1 understandable method to assign the costs. Some costs are directly assignable to a
 2 single class, or even a single customer. For instance, the costs associated with the
 3 poles and luminaries used for street lighting are directly assigned to the street
 4 lighting class. Most costs, however, are attributable to more than one type of
 5 customer. These are joint costs and must be allocated to customers by an
 6 allocation methodology that is based on the manner in which the costs are caused
 7 by the different customers.

8 The following flowchart (Figure 1) provides an overview of how the
 9 allocation of costs to customer classes is determined.

Figure 1:



1 In the illustration above, costs are functionalized into production,
2 transmission, distribution, etc. Some of these costs can be directly assigned to a
3 customer class. The remaining joint costs are incurred based on the number of
4 customers, the energy used, or by the capacity demanded. In many instances, the
5 classification process will lead to an allocation methodology. For example, the
6 cost of billing customers varies with the number of customers as well as the
7 complexity of preparing the customer's bill, so those costs associated with billing
8 are allocated to the customer classes based on a weighted number of customers.
9 An allocation factor using a weighted number of customers is developed by
10 multiplying the number of customers in each class by a factor representing the
11 difference in cost associated with providing that service to different types of
12 customers. Similarly, the cost of fuel varies by the number of kilowatt hours
13 consumed and, therefore, is allocated based on the proportion of total energy used
14 by a customer class.

15 The next step is the classification of the functionalized costs as demand-,
16 energy- or customer-related. The final step in the cost assignment process is to
17 allocate the functionalized and classified costs to the customer classes through the
18 use of allocation factors.

19 When this process is completed and all of the costs are allocated to the
20 customer classes, the result is a fully allocated cost study that establishes cost
21 responsibility and makes it possible to determine rates based on costs that are just
22 and reasonable.

1 **Q. WHAT CRITERIA ARE USED WHEN SELECTING ALLOCATION**
2 **FACTORS FOR EACH FUNCTIONAL AND CLASSIFIED COST?**

3 A. Generally, the following criteria should be used to determine the appropriateness
4 of an allocation methodology:

5 1) The method should reflect the planning and operating
6 characteristics of the utility's system.

7 2) The method should recognize customer class characteristics such
8 as energy usage, peak demand on the system, diversity
9 characteristics, number of customers, etc.

10 3) The method should produce stable results on a year-to-year basis.

11 4) Customers who benefit from the use of the system should also bear
12 appropriate cost responsibility for the system.

13 **Q. DOES THE ALLOCATION METHOD EMPLOYED BY THE COMPANY**
14 **MEET THESE OBJECTIVES?**

15 A. Yes, it does. The allocation methodology utilized in the Company's cost-of-
16 service study was chosen while considering each of the criteria listed above. The
17 results of the cost-of-service study can be relied upon to determine the appropriate
18 revenue requirement for the Kentucky Power customer classes.

VI. ALLOCATION BASIS

19 **Q. PLEASE EXPLAIN THE ALLOCATION OF PRODUCTION PLANT.**

20 A. After electric plant-in-service is functionalized into production, transmission,
21 distribution and general plant, production plant is classified as demand-related
22 and is allocated using the production demand allocation factor. The production

1 demand allocation factor assigns costs based on the class contribution to the
2 average of Kentucky Power's 12 monthly peaks on the production facilities for
3 the test period ended March 31, 2013.

4 **Q. PLEASE EXPLAIN HOW GENERATOR STEP-UP TRANSFORMERS**
5 **WERE ALLOCATED.**

6 A. Generator step-up transformers are included in transmission plant, but were
7 allocated using the production demand allocation factor since they are more
8 related to the production function.

9 **Q. PLEASE EXPLAIN THE ALLOCATION OF TRANSMISSION PLANT.**

10 A. Transmission plant, excluding generator step-up transformers, is classified as
11 demand related and is allocated using the transmission demand allocation factor.
12 The transmission demand allocation factor assigns costs based on the class
13 contribution to the average of Kentucky Power's 12 monthly peaks on the
14 transmission facilities.

15 **Q. PLEASE EXPLAIN THE ALLOCATION OF DISTRIBUTION PLANT.**

16 A. Distribution plant is classified as demand / customer related and allocated to the
17 customer classes using factors based on demand levels or number of customers.
18 Distribution plant accounts 360 through 368, as shown on Exhibit JMS-2, were
19 classified solely as demand-related. Accounts 360, 361 and 362 were allocated to
20 the distribution customer classes based on their contributions to the average of
21 Kentucky Power's 12 monthly peak demands on the primary distribution system.

22 Accounts 364 through 368 were split into primary and secondary voltage
23 functions based upon information contained in the company's records and the

1 expertise of the company's distribution engineers. The primary portions of
2 accounts 364 through 368 were allocated using the average of 12 monthly peak
3 demands on the distribution system. The secondary component of accounts 364
4 through 368 were allocated based on a combination of each class's 12-month
5 maximum demand and the summation of individual customers' annual maximum
6 demands in each class served from those facilities. This process reflects the fact
7 that some secondary facilities serve only one customer, while others serve two or
8 more customers.

9 Services, account 369, was classified as customer-related and was
10 allocated using the average number of secondary customers served.

11 Meter plant was allocated using the average number of customers
12 weighted by a factor which considers the cost differential of various metering
13 installations. Account 371 was directly assigned to the outdoor lighting class and
14 account 373 was directly assigned to the street lighting class.

15 **Q. PLEASE EXPLAIN HOW GENERAL AND INTANGIBLE PLANT WAS**
16 **ALLOCATED.**

17 A. General and intangible plant and investment reflects a composite demand, energy
18 and customer classification. General and intangible plant investment is allocated
19 on the basis of payroll labor.

20 **Q. PLEASE DESCRIBE THE ALLOCATION OF ACCUMULATED**
21 **PROVISION FOR DEPRECIATION AND AMORTIZATION.**

22 A. Accumulated Provision for Depreciation and Amortization was functionalized and
23 classified in a fashion similar to Electric Plant-in-Service. Production,

1 transmission, distribution and general and intangible related amounts were
2 allocated based upon the allocation of the related Electric Plant-in-Service costs.

3 **Q. PLEASE DESCRIBE THE ALLOCATION OF WORKING CAPITAL.**

4 A. Working Capital was divided into cash, material and supplies and prepayments.

5 Cash working capital is made up of two components. The first component is

6 related to system sales and is split between demand and energy. The second

7 component is related to O&M expense net of system sales. The component

8 related to system sales demand was allocated based upon the production demand

9 allocation factor. System sales energy was allocated based upon the energy

10 allocation factor, which allocates costs based on the class energy used during the

11 period compared to the total energy used by all classes. The O&M expense net of

12 system sales was allocated based upon the allocation of total O&M expense. .

13 Materials and supplies were split between fuel stock, production, and

14 transmission and distribution. Fuel stock was allocated using the energy

15 allocation factor. Production-related material and supplies were allocated using

16 the production demand allocation factor and the transmission- and distribution-

17 related materials and supplies were allocated using the allocation of transmission

18 and distribution electric plant-in-service.

19 Prepayments were allocated using factors developed from gross plant

20 relationships.

21 **Q. PLEASE DESCRIBE THE ALLOCATION OF OTHER RATE BASE**
22 **COMPONENTS.**

1 A. Plant Held for Future Use includes a transmission component, allocated using
2 transmission electric plant-in-service, and a distribution component, allocated
3 using distribution plant-in-service. Construction Work-in-Progress was
4 functionalized and allocated using appropriate related Electric Plant-in-Service
5 factors. Accumulated Deferred Federal Income Tax Credits were allocated on
6 Electric Plant-in-Service. Customer Deposits were assigned based on an analysis
7 of accounting records and customer advances were allocated based on the number
8 of customers.

9 **Q. HOW WERE REVENUES DEVELOPED FOR EACH CLASS?**

10 A. Sales revenues were directly assigned to each class.

11 Forfeited discounts were directly assigned based on an analysis of
12 accounting records. Miscellaneous service revenue was allocated on distribution
13 plant-in-service.

14 Rent from electric property and other electric revenue was functionalized
15 and allocated to classes based on related functional allocators.

16 **Q. PLEASE DESCRIBE THE ALLOCATION OF PRODUCTION
17 OPERATION AND MAINTENANCE (O&M) EXPENSE.**

18 A. Production-related O&M was classified as either demand or energy related. The
19 demand component was allocated using the production demand allocation factor
20 and the energy component was allocated using the energy allocation factor.
21 Demand-related system sales revenue was allocated based on the production demand
22 allocation factor. Energy-related system sales revenue was allocated on the energy
23 allocation factor.

1 **Q. PLEASE DESCRIBE THE ALLOCATION OF TRANSMISSION O&M.**

2 A. Transmission-related O&M was broken down into three pieces: PJM OATT
3 Transmission Owner (TO) revenues, expenses incurred through PJM as a Load
4 Serving Entity (LSE) and the traditional transmission cost-of-service expenses
5 recorded in FERC accounts 560 – 574. Revenues earned through PJM as a TO
6 and the traditional transmission cost-of-service expenses are classified as
7 transmission and allocated using the transmission demand allocation factor.
8 Expenses incurred through PJM as a LSE are classified as production expenses
9 and allocated using the production demand allocation factor.

10 **Q. PLEASE DESCRIBE THE ALLOCATION OF DISTRIBUTION O&M**
11 **AMONG THE VARIOUS CUSTOMER CLASSES.**

12 A. Distribution O&M expenses were functionalized and classified according to the
13 associated distribution plant accounts and allocated accordingly. Accounts 581,
14 Load Dispatching and 582, Station Expenses were allocated using the distribution
15 demand allocation factor. Account 583 Overhead Line Expense was allocated
16 based upon the same allocation used for plant account 365 Overhead Lines.
17 Account 584 Underground Line Expense was allocated based upon the same
18 allocation used for plant accounts 366 Underground Conduit and 367
19 Underground Lines. Account 585, Street Lighting Operation Expense, was
20 classified as customer-related and directly assigned to the street lighting class.
21 Meter Operation Expense, account 586, was classified customer-related and
22 allocated in the same manner as meter plant. Account 587, Customer Installation

1 Expense was classified as customer-related and allocated based on primary
2 customers.

3 Accounts 588 and 589 were allocated on total distribution plant and
4 classified accordingly. Account 580 was classified as demand- and customer-
5 related and allocated using the allocated subtotal of accounts 581 through 589.

6 Accounts 591 and 592 were classified demand-related and allocated on the
7 distribution demand allocation factor. Accounts 593, 594, and 595 were
8 functionalized and classified according to the associated distribution plant
9 accounts and allocated accordingly. Distribution maintenance account 596 was
10 directly assigned to the street lighting class. Account 597 was classified
11 customer-related and allocated in the same manner as meter plant. Account 598
12 was classified customer-related and directly assigned to the outdoor lighting class.
13 Account 590 was classified and allocated based on the sum of the allocated O&M
14 expense accounts 591 through 598.

15 **Q. CAN YOU EXPLAIN HOW CUSTOMER ACCOUNTING (ACCOUNTS**
16 **901-905), CUSTOMER SERVICES (ACCOUNTS 907-910) AND SALES**
17 **EXPENSE (ACCOUNTS 911-916) WERE ALLOCATED?**

18 A. Account 902, Meter Reading Expense, was allocated to those classes with meter
19 installations based upon an average number of customers weighted to reflect
20 differences in meter reading requirements. Customer Records Expense, account
21 903, was divided into two categories of cost; call center and other. Call center
22 costs were first split into residential and other based on the number of calls
23 received and then other call center expenses were allocated based on the number

1 of customers. The other category of expenses was allocated based on the number
2 of customers. Account 904, Uncollectibles, was allocated based on the number of
3 customers. Accounts 901 and 905 were allocated based on the sum of the
4 allocated accounts 902, 903 and 904.

5 Accounts 907 through 916, Customer Service Expenses and Sales
6 Expenses, were allocated based on the number of customers.

7 **Q. PLEASE DESCRIBE THE ALLOCATION OF ADMINISTRATIVE AND**
8 **GENERAL (A&G) EXPENSE.**

9 A. A&G expense, excluding regulatory expense, was functionalized and classified
10 using O&M labor expense. The functionalized/classified cost was then allocated
11 using the appropriate functional classification allocator. A&G regulatory expense
12 was allocated to the customer classes based on sales revenue.

13 **Q. PLEASE DESCRIBE THE ALLOCATION OF DEPRECIATION AND**
14 **AMORTIZATION EXPENSE.**

15 A. The functionalized components of depreciation and amortization expense were
16 allocated using the corresponding plant items.

17 **Q. HOW WERE TAXES ASSIGNED TO THE CUSTOMER CLASSES?**

18 A. Individual tax items other than income taxes were allocated and classified using
19 the appropriate demand or plant allocator.

20 Interest expense was allocated on rate base and individual Schedule M
21 items were allocated using the appropriate allocators. State and current Federal
22 income taxes were computed by class. Feedback of prior Investment Tax Credit

1 Normalized was allocated based on gross utility plant and individual Deferred
 2 Federal Income Tax items were allocated using the appropriate allocation factors.

3 **Q. PLEASE DESCRIBE THE ALLOCATION OF THE ALLOWANCE FOR**
 4 **FUNDS USED DURING CONSTRUCTION (AFUDC) OFFSET.**

5 A. The AFUDC offset was split between the individual functionalized components.
 6 The production component was allocated using the production demand allocator.
 7 The transmission and distribution components were allocated using the
 8 corresponding plant allocators. The general plant component was allocated using
 9 the labor allocation factor.

10 **Q. PLEASE DESCRIBE THE ALLOCATION OF THE VARIOUS**
 11 **JURISDICTONAL ADJUSTMENTS.**

12 A. The jurisdictional adjustments are identified in the various sections of the cost-of-
 13 service study to which they apply. Each adjustment was allocated using a method
 14 consistent with both the nature of the adjustment and the underlying line item
 15 being adjusted. For example, an adjustment to employee-related expenses would
 16 be allocated using the labor allocation factor but an adjustment for Mitchell Plant
 17 employee-related expenses would be allocated using the production labor
 18 allocation factor.

19 **Q. WHAT IS THE RESULTING EARNED RATE OF RETURN FOR EACH**
 20 **CLASS SHOWN IN THE CLASS COST-OF-SERVICE STUDY?**

21 A. The resulting earned rates of return are as follows:

CLASS	ROR
Residential	1.74 %
Small General Service	9.14 %

Medium General Service	8.20 %
Large General Service	6.82 %
Quantity Power	4.85 %
Commercial and Industrial Power - Time of Day	3.25 %
Municipal Waterworks	10.67 %
Outdoor Lighting	8.02 %
Street Lighting	11.85 %
Total Kentucky Power Jurisdiction	3.66 %

1

VII. REVENUE ALLOCATION

2 **Q. HOW ARE THESE RATES OF RETURN USED IN THIS PROCEEDING?**

3 A. The earned rates of return for each class form the basis for the allocation of the
4 revenue increase required for each class.

5 **Q. PLEASE EXPLAIN THE PRINCIPLES OR GUIDELINES THAT YOU**
6 **FOLLOWED IN ALLOCATING THE PROPOSED REVENUE INCREASE**
7 **AMONG THE TARIFF CLASSES.**

8 A. One key objective of ratemaking is to design rates such that they reflect as nearly
9 as possible the actual costs of serving the customer. To fully meet this objective
10 would require that the rates of return for all tariff classes be equalized. However,
11 as discussed by Company witness Wohnhas, the Company opted not to equalize
12 returns across tariff classes.

13 **Q. PLEASE DESCRIBE EXHIBIT JMS-3.**

14 A. Exhibit JMS-3 is the calculation of the allocation of the proposed revenue
15 increase to each class of customers. Page 1 is a summary of the calculation of the
16 required sales revenue per class, net of the Transmission OATT adjustment. Page

1 2 of the exhibit calculates the current subsidies received by each class. Page 3, in
2 Columns 2 through 11, shows the calculation of the required sales revenue for
3 each class before adjusting to include each class' current subsidy.

4 **Q. PLEASE DESCRIBE THE TRANSMISSION OATT ADJUSTMENT**
5 **IDENTIFIED ON PAGE 1 OF JMS-3.**

6 A. The \$3.8 million, calculated in the Class Cost-of-Service Study and identified in
7 Column 10 on page 1 of JMS-3, reflects the embedded cost of transmission net of
8 the OATT revenues the Company receives from PJM as a transmission owner.
9 These costs are removed from the required sales revenue because they will be
10 recovered through the PJM OATT charges in base rates, as discussed by
11 Company witness Vaughan.

12 **Q. DOES THIS CONCLUDE YOUR DIRECT TESTIMONY?**

13 A. Yes, it does.

KENTUCKY POWER COMPANY
DEVELOPMENT OF ANNUALIZATION ADJUSTMENT
TEST YEAR ENDED MARCH 31, 2013

Tariff (1)	Year End Adjusted Number of Customers (2)	Mar 2013 Number of Customers (3)	Year End Adjusted Metered KWH (4)	Year End Migration Revenue (5)	Specific Customer Adjustment				After Specific Customer Adjustment			
					Number of Customers (6)	Mar 2013 Number of Customers (7)	Metered KWH (8)	Revenue (9)	Year End Adjusted Number of Customers (10)=(2)+(6)	Mar 2013 Number of Customers (11)=(3)+(7)	Year End Adjusted Metered KWH (12)=(4)+(8)	Year End Migration Revenue (13)=(5)+(9)
RS Total	1,687,601	140,571	2,303,927,683	\$203,713,519					1,687,601	140,571	2,303,927,683	\$203,713,519
RSLMTOD Total	2,135	176	4,353,629	\$347,919					2,135	176	4,353,629	\$347,919
RS TOD Total	36	3	41,195	\$3,450					36	3	41,195	\$3,450
OL	789,504	67,412	43,401,212	\$7,334,685					789,504	67,412	43,401,212	\$7,334,685
SGS Metered Total	266,356	22,222	132,952,808	\$15,795,033					266,356	22,222	132,952,808	\$15,795,033
SGSLMTOD (225)	13	1	1,075	\$265					13	1	1,075	\$265
SGS NM Total	13,482	1,113	3,346,486	\$490,810					13,482	1,113	3,346,486	\$490,810
SGS TOD (227)	976	78	385,187	\$50,680					976	78	385,187	\$50,680
MGS RL (214)	887	74	1,553,507	\$146,638					887	74	1,553,507	\$146,638
MGS Sec Total	85,045	7,080	502,379,810	\$50,186,501					85,045	7,080	502,379,810	\$50,186,501
MGSLMTOD (223)	576	48	994,551	\$86,827					576	48	994,551	\$86,827
MGSTOD (229)	928	75	4,057,931	\$352,669					928	75	4,057,931	\$352,669
MGS Pri Total	1,061	83	17,041,328	\$1,604,933	0	0	0	\$0	1,061	83	17,041,328	\$1,604,933
MGS Sub (236)	239	13	6,909,726	\$640,068	0	0	0	\$0	239	13	6,909,726	\$640,068
LGS Sec Total	8,948	750	558,190,087	\$49,342,377					8,948	750	558,190,087	\$49,342,377
LGSLMTOD (251)	108	9	2,936,819	\$252,273					108	9	2,936,819	\$252,273
LGS Pri	976	83	95,311,904	\$7,897,030	0	0	0	\$0	976	83	95,311,904	\$7,897,030
LGS Sub (248)	261	20	49,277,975	\$3,176,749	0	0	0	\$0	261	20	49,277,975	\$3,176,749
LGS Tran (250)	24	2	9,997,323	\$584,583	0		0	\$0	24	2	9,997,323	\$584,583
QP Sec (356)	37	2	12,543,725	\$880,343					37	2	12,543,725	\$880,343
QP Pri	525	43	353,159,849	\$23,153,148	0	0	0	\$0	525	43	353,159,849	\$23,153,148
QP Sub (359)	341	27	301,121,404	\$18,893,415	0	0	0	\$0	341	27	301,121,404	\$18,893,415
QP Tran (360)	26	2	15,672,816	\$1,043,111	12	1	29,448,408	\$1,481,415	38	3	45,121,224	\$2,524,527
CIP Sub (371)	159	13	1,868,248,498	\$93,578,897	0	0	0	\$0	159	13	1,868,248,498	\$93,578,897
CIP Tran (372)	48	4	399,403,850	\$20,013,271	(12)	(1)	(65,681,838)	(\$4,244,380)	36	3	333,722,012	\$15,768,891
SL	144,364	11,954	8,499,237	\$1,262,243					144,364	11,954	8,499,237	\$1,262,243
MW (540)	145	11	4,210,511	\$343,116					145	11	4,210,511	\$343,116
Total	3,004,801	251,869	6,699,920,126	\$501,174,552	0	0	(36,233,430)	(\$2,762,965)	3,004,801	251,869	6,663,686,696	\$498,411,587

KENTUCKY POWER COMPANY
DEVELOPMENT OF ANNUALIZATION ADJUSTMENT
TEST YEAR ENDED MARCH 31, 2013

Tariff (1)	Year End Adjusted Number of Customers * (2)	Mar 2013 Annual Average Number of Customers (3)	Mar 2013 Number of Customers * (4)	Customer Growth (5)=(4)-(3)	Year End Adjusted Metered KWH * (6)	TME Mar 2013 Average KWH Per Customer (7)=(6)/(3)	KWH Annualization Adjustment (8)=(5)x(7)	Year End Migration Revenue * (9)	TME Mar 2013 Average Revenue Per KWH (10)=(9)/(6)	Revenue Annualization Adjustment ** (11)=(8)x(10)
RS Total	1,687,601	140,633.417	140,571	(62.417)	2,303,927,683	16,383	(1,022,572)	\$203,713,519	\$0.08842	(\$90,417)
RSLMTOD Total	2,135	177.917	176	(1.917)	4,353,629	24,470	(46,901)	\$347,919	\$0.07991	(\$3,750)
RS TOD Total	36	3.000	3	0.000	41,195	13,732	0	\$3,450	\$0.08376	\$0
OL	789,504	65,791.964	67,412	1,620.526	43,401,212	660	1,205,611	\$7,334,685	\$0.16900	\$190,098
SGS Metered Total	266,356	22,196.333	22,222	25.667	132,952,808	5,990	153,743	\$15,795,033	\$0.11880	\$18,269
SGSLMTOD (225)	13	1.083	1	(0.083)	1,075	992	(83)	\$265	\$0.24679	(\$20)
SGS NM Total	13,482	1,123.500	1,113	(10.500)	3,346,486	2,979	(31,280)	\$490,810	\$0.14666	(\$4,589)
SGS TOD (227)	976	81.333	78	(3.333)	385,187	4,736	(15,787)	\$50,680	\$0.13157	(\$2,077)
MGS RL (214)	887	73.917	74	0.083	1,553,507	21,017	1,751	\$146,638	\$0.09439	\$164
MGS Sec Total	85,045	7,087.083	7,080	(7.083)	502,379,810	70,887	(502,116)	\$50,186,501	\$0.09990	(\$50,165)
MGSLMTOD (223)	576	48.000	48	0.000	994,551	20,720	0	\$86,827	\$0.08730	\$1
MGSTOD (229)	928	77.333	75	(2.333)	4,057,931	52,473	(122,437)	\$352,669	\$0.08691	(\$10,641)
MGS Pri Total	1,061	88.417	83	(5.417)	17,041,328	192,739	(1,044,003)	\$1,604,933	\$0.09418	(\$98,311)
MGS Sub (236)	239	19.917	13	(6.917)	6,909,726	346,932	(2,399,613)	\$640,068	\$0.09263	(\$222,323)
LGS Sec Total	8,948	745.667	750	4.333	558,190,087	748,579	3,243,842	\$49,342,377	\$0.08840	\$286,730
LGSLMTOD (251)	108	9.000	9	0.000	2,936,819	326,313	0	\$252,273	\$0.08590	\$0
LGS Pri	976	81.333	83	1.667	95,311,904	1,171,868	1,953,113	\$7,897,030	\$0.08285	\$161,763
LGS Sub (248)	261	21.750	20	(1.750)	49,277,975	2,265,654	(3,964,895)	\$3,176,749	\$0.06447	(\$255,376)
LGS Tran (250)	24	2.000	2	0.000	9,997,323	4,998,662	0	\$584,583	\$0.05847	(\$121)
QP Sec (356)	37	3.083	2	(1.083)	12,543,725	4,068,235	(4,407,255)	\$880,343	\$0.07018	(\$309,307)
QP Pri	525	43.750	43	(0.750)	353,159,849	8,072,225	(6,054,169)	\$23,153,148	\$0.06556	(\$396,880)
QP Sub (359)	341	28.417	27	(1.417)	301,121,404	10,596,648	(15,011,918)	\$18,893,415	\$0.06274	(\$941,781)
QP Tran (360)	38	3.167	3	(0.167)	45,121,224	14,248,808	(2,374,801)	\$2,524,527	\$0.05595	(\$132,867)
CIP Sub (371)	159	13.250	13	(0.250)	1,868,248,498	140,999,887	(35,249,972)	\$93,578,897	\$0.05009	(\$1,765,895)
CIP Tran (372)	36	3.000	3	0.000	333,722,012	111,240,671	0	\$15,768,891	\$0.04725	(\$9,520)
SL	144,364	12,030.366	11,954	(76.446)	8,499,237	706	(177,227)	\$1,262,243	\$0.14851	(\$21,947)
MW (540)	145	12.083	11	(1.083)	4,210,511	348,456	(377,494)	\$343,116	\$0.08149	(\$30,761)
Total	3,004,801	250,400.080	251,869	1,469.330	6,663,686,696	26,612	(66,244,463)	\$498,411,587		(\$3,689,728)

* After Specific Customer Adjustment

** Values may not calculate due to rounding and calculation by lamp instead of customer for lighting.

KENTUCKY POWER COMPANY
DEVELOPMENT OF OPERATING RATIO
TWELVE MONTHS ENDED MARCH 31, 2013

<u>Line No.</u>	<u>Description</u>	<u>Amount</u>	<u>Source</u>
<u>Operating Revenues</u>			
1	Sales of Electricity	\$ 500,358,022	Sec. V, Sch.4, P.1, Col. 3, line 1
2	Capacity Charge Revenues Rockport Unit Power Agreement	(5,812,595)	Sec. V, WP S-4, p. W3, Col. 4, line 16
3	Customer Migration Adjustment	5,202,026	Sec. V, WP S-4, p. W22, Col. 3, line 15
4	Removal of Environmental Surcharge Provision for Refund	1,635,430	Sec. V, WP S-4, p. W30, Col. 3, line 3
5	Removal Refund Environmental Surcharge Clause	1,159,112	Sec. V, WP S-4, p. W31, Col. 3, line 3
6	Fuel Under (Over) Revenues	<u>(1,367,443)</u>	Sec. V, WP S-4, p. W34, Col. 3, line 8
7	Total	\$ 501,174,552	Sum of Lines 1 - 6
<u>Operating Expenses</u>			
8	Total Adjusted O&M	\$330,975,687	Sec. V, Sch.4, P.1, Line 4. Col. 5
9	Less: Customer Annualization O&M Effect	<u>(\$4,016,801)</u>	Less: Sec. V, WP S-4, p W23, Line 2, Col. 3
10	Subtotal	\$334,992,488	Sum of Lines 8 and 9
11	Total O&M Labor	\$22,903,172	Sec.V, WP S-7, p.1
12	Salaries & Wages Annualization Adjustment	\$609,325	Sec.V, WP S-4, p.38
13	Mitchell Salaries & Wages Annualization Adjustment	<u>\$30,375</u>	Sec.V, WP S-4, p.50
14	Subtotal	\$23,542,872	Sum of Lines 11 - 13
15	Adjusted O&M Less Labor Expense	\$311,449,616	Line 10 less Line 14
17	<u>Operating Ratio</u>	62.14%	Line 15 divided by Line 7

KENTUCKY POWER COMPANY
COST-OF-SERVICE STUDY
TWELVE MONTHS ENDING
MARCH 31, 2013

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Label	Constant	Allocation Factor	Function	Total Retail 1	RS 2	SGS 3	Total MGS	Total LGS	Total OP	Total CIP-TOD	MW 17	QL 18	SL 19
Amortization of Defd Preliminary Big Sandy FGD Costs	(358,965)	PROD_DEMAND	TOTAL	(358,965)	(167,014)	(6,704)	(30,223)	(38,114)	(32,045)	(84,249)	(152)	(397)	(67)
Fuel Over/Under Revenues	(478,605)	FUELREV	TOTAL	(478,605)	(164,894)	(9,764)	(38,070)	(48,754)	(51,127)	(161,988)	(301)	(3,100)	(607)
AFUDC Offset Adjustment	202,780	AFUDC_OFF	TOTAL	202,780	103,702	5,048	17,903	21,213	15,430	36,530	88	2,562	303
KPCo Depreciation Annualization	(4,540,714)	RB_GUP	TOTAL	(4,540,714)	(2,459,192)	(130,968)	(414,175)	(472,417)	(305,674)	(855,008)	(2,000)	(90,747)	(10,534)
Mitchell AFUDC Offset Adjustment	815,801	PROD_DEMAND	TOTAL	815,801	379,564	15,236	68,685	86,619	72,828	191,468	345	903	153
Mitchell Depreciation Annualization	(977,942)	PROD_DEMAND	TOTAL	(977,942)	(455,002)	(18,264)	(82,337)	(103,835)	(87,302)	(229,522)	(414)	(1,083)	(183)
Mitchell Plant Depreciation-Related Schedule M's	(1,705,646)	PROD_DEMAND	TOTAL	(1,705,646)	(793,578)	(31,854)	(143,605)	(181,100)	(152,265)	(400,314)	(722)	(1,889)	(320)
Amortization of Big Sandy Depreciation & O&M	(5,191,188)	PROD_DEMAND	TOTAL	(5,191,188)	(2,415,279)	(96,946)	(437,066)	(551,183)	(463,424)	(1,218,369)	(2,198)	(5,748)	(973)
Total Adjustments to DFIT	(11,350,101)		TOTAL	(11,350,101)	(5,521,819)	(242,770)	(965,112)	(1,185,877)	(939,940)	(2,395,830)	(4,841)	(84,847)	(8,965)
Total Deferred FIT	8,220,628		TOTAL	8,220,628	4,969,974	349,814	812,433	838,995	354,127	522,714	4,469	321,704	46,398
Total Federal Income Tax	4,834,163		TOTAL	4,834,163	(5,107,896)	1,322,265	3,787,978	3,261,929	988,564	(233,091)	28,019	649,113	137,282
Total Income Tax	6,095,470		TOTAL	6,095,470	(5,768,404)	1,532,923	4,438,085	3,845,321	1,214,127	(94,079)	32,655	738,561	156,281
Total Expenses	447,660,897		TOTAL	447,660,897	197,456,509	13,052,246	42,400,150	51,122,151	38,281,041	98,497,441	240,493	5,698,891	911,875
Net Operating Income	48,922,772		TOTAL	48,922,772	10,202,470	3,444,729	10,515,600	10,276,907	4,975,731	7,368,066	70,165	1,755,016	314,088
AFUDC Offset													
Production	798,042	PROD_DEMAND	TOTAL	798,042	371,301	14,904	67,190	84,733	71,242	187,300	338	884	150
Transmission	631,192	RB_GUP_EPIS_T	TOTAL	631,192	290,488	11,636	52,359	66,100	57,564	151,973	264	690	117
Distribution	443,251	RB_GUP_EPIS_D	TOTAL	443,251	292,881	19,655	45,704	45,285	14,390	606	208	22,043	2,477
General	46,466	LABOR_M	TOTAL	46,466	26,685	1,578	4,166	2,822	2,822	5,815	20	631	127
Total Per Books AFUDC Offset	1,918,951		TOTAL	1,918,951	981,356	47,772	169,419	200,740	146,018	345,695	831	24,249	2,871
AFUDC Offset Adjustment	1,368,889	AFUDC_OFF	TOTAL	1,368,889	700,053	34,079	120,855	143,198	104,163	246,603	593	17,298	2,048
Mitchell AFUDC Offset Adjustment	3,647,948	PROD_DEMAND	TOTAL	3,647,948	1,697,263	68,127	307,134	387,327	325,657	856,172	1,545	4,039	684
Total AFUDC Offset Adjustments	5,016,837	PROD_DEMAND	TOTAL	5,016,837	2,397,316	102,206	427,990	530,525	429,819	1,102,774	2,137	21,337	2,732
Total Adjusted AFUDC Offsets	6,935,788		TOTAL	6,935,788	3,378,671	149,978	597,409	731,265	575,838	1,448,470	2,969	45,586	5,602
Adjusted Net Operating Income	55,858,560		TOTAL	55,858,560	13,581,142	3,594,707	11,113,008	11,008,172	5,551,569	8,816,536	73,134	1,800,602	319,691
Current Rate of Return				3.66%	1.74%	9.14%	8.20%	6.82%	4.85%	3.25%	10.67%	8.02%	11.85%
O&M Labor													
Production Demand	8,609,401	PROD_DEMAND	TOTAL	8,609,401	4,005,654	160,785	724,858	914,118	768,572	2,020,622	3,645	9,533	1,614
Production Energy	1,195,224	PROD_ENERGY	TOTAL	1,195,224	426,517	25,290	97,646	131,483	121,626	382,164	709	8,251	1,539
Transmission	1,073,438	EXP_OM_TRAN	TOTAL	1,073,438	496,891	19,925	89,751	113,241	96,799	254,997	452	1,182	200
Distribution	8,536,264	EXP_OM_DIST	TOTAL	8,536,264	5,807,789	322,595	933,453	951,249	305,636	7,511	4,403	149,052	54,577
Customer Accounts	1,322,911	EXP_OM_CUSTACCT	TOTAL	1,322,911	1,135,945	135,238	44,795	5,649	523	112	64	296	290
Customer Service	559,966	EXP_OM_CUSTSERV	TOTAL	559,966	358,067	59,565	18,757	2,198	191	41	28	120,977	142
Total	21,297,204		TOTAL	21,297,204	12,230,863	723,989	1,909,259	2,117,937	1,293,346	2,665,446	9,301	289,291	58,362
Production Demand	8,609,401	PROD_DEMAND	TOTAL	8,609,401	4,005,654	160,785	724,858	914,118	768,572	2,020,622	3,645	9,533	1,614
Production Energy	1,195,224	PROD_ENERGY	TOTAL	1,195,224	426,517	25,290	97,646	131,483	121,626	382,164	709	8,251	1,539
Total Production	9,804,625		TOTAL	9,804,625	4,432,171	186,076	822,503	1,045,600	890,198	2,402,786	4,354	17,784	3,153
Calculation of Proposed Revenues													
Proposed Operating Income	128,001,777	RATEBASE	TOTAL	128,001,777	50,407,033	5,453,850	17,517,325	18,631,672	10,960,639	21,616,655	105,519	2,861,883	447,202
Proposed Rate of Return				8.38%	6.47%	13.86%	12.92%	11.55%	9.57%	7.98%	15.39%	12.74%	16.57%
Income Increase	72,143,217		TOTAL	72,143,217	36,825,891	1,859,143	6,404,317	7,623,500	5,409,070	12,800,119	32,385	1,061,281	127,511
Gross Revenue Conversion Factor	1.632721												
Revenue Increase	117,789,745		TOTAL	117,789,745	60,126,406	3,035,462	10,456,463	12,447,049	8,831,502	20,899,023	52,876	1,732,776	208,190
Percent Revenue Increase				18.47%	29.91%	18.84%	20.16%	20.55%	20.56%	19.73%	17.20%	23.36%	17.04%
Proposed Sales Revenue	605,191,527		TOTAL	605,191,527	261,146,428	19,147,535	62,325,971	73,007,087	51,794,158	126,828,383	360,268	9,151,469	1,430,229
Adjust Transmission OATT	(3,790,918)		TOTAL	(3,790,918)	2,427,414	(498,306)	(1,975,425)	(1,867,582)	(912,679)	(915,389)	(17,355)	(23,693)	(7,903)
Total Proposed Sales Revenue	601,400,609		TOTAL	601,400,609	263,573,842	18,649,229	60,350,546	71,139,505	50,881,479	125,912,994	342,913	9,127,776	1,422,325

KENTUCKY POWER COMPANY
 COST-OF-SERVICE STUDY
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Allocation Factor	Total Retail 1	RS 2	SGS 3	MGS-SEC 4	MGS-PRI 5	MGS-SUB 6	LGS-SEC 7	LGS-PRI 8	LGS-SUB 9	LGS-TRA 10	QP-SEC 11	QP-PRI 12	QP-SUB 13	QP-TRA 14	QIP-TOD-SUB 15	QIP-TOD-TRA 16	MW 17	OL 18	SL 19
AFUDC_OFF PRODUCTION	0.43524107	0.20250251	0.00812836	0.03526573	0.00108306	0.00029576	0.03659111	0.00614858	0.00285683	0.00061594	0.00045106	0.01877396	0.01755838	0.00197312	0.08756048	0.01458038	0.00018428	0.00048193	0.00008158
AFUDC_OFF BULKTRAN	0.22535906	0.10485172	0.00420870	0.01825969	0.00056080	0.00015314	0.01894614	0.00318381	0.00147921	0.00031892	0.00023355	0.00972978	0.00914212	0.00102164	0.04533705	0.00755481	0.00009542	0.00024953	0.00004224
AFUDC_OFF SUBTRAN	0.09520859	0.04263538	0.00169859	0.00739012	0.00022491	0.00008196	0.00757420	0.00127449	0.00078118	-	0.00008437	0.00395714	0.00507298	-	0.02434632	-	0.00003885	0.00010102	0.00001710
AFUDC_OFF DISTPRI	0.12394735	0.08345397	0.00318209	0.01335504	0.00041225	-	0.01353934	0.00227086	-	0.00017870	0.00705883	-	-	-	-	-	0.00007222	0.00019161	0.00003244
AFUDC_OFF DISTSEC	0.08204391	0.06054673	0.00340250	0.00907038	-	-	0.00795571	-	-	0.00010313	-	-	-	-	-	-	0.00003953	0.00078587	0.00014036
AFUDC_OFF ENERGY	0.30135893	0.00046494	0.00002875	0.00010686	0.00000325	0.00000091	0.00001863	0.00001877	0.00000911	0.00000198	0.00000171	0.00007052	0.00005755	0.00000850	0.00036827	0.00006223	0.00000081	0.00000038	0.00000175
AFUDC_OFF CUSTOMER	0.03684108	0.01692687	0.00424609	0.00133490	0.00043482	0.00014369	0.00046120	0.00014989	0.00027181	0.00004060	0.00000123	0.00007757	0.00036695	0.00006389	0.00028388	0.00006089	0.00000189	0.01081708	0.00118053
AFUDC_OFF TOTAL	1.00000000	0.51140212	0.02489508	0.08489252	0.00271920	0.00067546	0.08518633	0.01304720	0.00538813	0.00087744	0.00106374	0.03966889	0.03229599	0.00306416	0.15787599	0.02227212	0.00043310	0.01263642	0.00149600
TRANS_TOTAL PRODUCTION	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
TRANS_TOTAL BULKTRAN	0.70300000	0.32708142	0.01312890	0.05696110	0.00174938	0.00047771	0.05910184	0.00893117	0.00461434	0.00099487	0.00072854	0.03032364	0.02851853	0.00318698	0.14142740	0.02356634	0.00029765	0.00077841	0.00013177
TRANS_TOTAL SUBTRAN	0.29700000	0.13299962	0.00529868	0.02277248	0.00070150	0.00025567	0.02362745	0.00397573	0.00243685	-	0.00029440	0.01237535	0.01582500	-	0.07594752	-	0.00012119	0.00031512	0.00005335
TRANS_TOTAL DISTPRI	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
TRANS_TOTAL DISTSEC	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
TRANS_TOTAL ENERGY	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
TRANS_TOTAL CUSTOMER	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
TRANS_TOTAL TOTAL	1.00000000	0.46008104	0.01842758	0.07973358	0.00245098	0.00073338	0.08272929	0.01390690	0.00705119	0.00089487	0.00102294	0.04269899	0.04434353	0.00318698	0.21737492	0.02356634	0.00041884	0.00109353	0.00018512

KENTUCKY POWER COMPANY
 COST-OF-SERVICE STUDY
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ALLOCATOR	FUNCTION	Total	RS	SGS	MGS-SEC	MGS-PRI	MGS-SUB	LGS-SEC	LGS-PRI	LGS-SUB	LGS-TRA	QP-SEC	QP-PRI	QP-SUB	QP-TRA	CIP-TOD-SUB	CIP-TOD-TRA	MW	DL	SL
RB_GUP	PRODUCTION	0.33143885	0.15420895	0.00618980	0.02685598	0.00082477	0.00022522	0.02786436	0.00468218	0.00217549	0.00046905	0.00034348	0.01429649	0.01344545	0.00150254	0.06667786	0.01111067	0.00014033	0.00036699	0.00066213
RB_GUP	BULKTRAN	0.19089786	0.08881812	0.00356512	0.01546764	0.00047504	0.00012972	0.01604895	0.00229678	0.00125301	0.00027015	0.00019783	0.00823431	0.00774413	0.00086542	0.03840425	0.00639938	0.00008853	0.00021137	0.00003578
RB_GUP	SUBTRAN	0.08046796	0.03603437	0.00143560	0.00616968	0.00018009	0.00006827	0.00640153	0.00107717	0.00066023	-	0.00007976	0.00335293	0.00428756	-	0.02057691	-	0.00003283	0.00008538	0.00001445
RB_GUP	DISTPRI	0.20200779	0.13601220	0.00518613	0.02209183	0.00067187	-	0.02206625	0.00370102	-	-	0.00029125	0.01150439	-	-	-	-	0.00011770	0.00031228	0.00005286
RB_GUP	DISTSEC	0.13300980	0.09874889	0.00554932	0.01478288	-	-	0.01297539	-	-	-	0.00016819	-	-	-	-	-	0.00006448	0.00022892	-
RB_GUP	ENERGY	0.00172510	0.00061561	0.00003650	0.00013566	0.00000413	0.00000115	0.00015060	0.00002510	0.00001157	0.00000251	0.00000217	0.00008952	0.00007306	0.00001079	0.00046751	0.00008408	0.00000102	0.00001191	0.00000222
RB_GUP	CUSTOMER	0.05965264	0.02715084	0.00689048	0.00216245	0.00071168	0.00023519	0.00075249	0.00024505	0.00044489	0.00006645	0.00000200	0.00012697	0.00006061	0.00009968	0.00043193	0.00009968	0.00000323	0.01771550	0.00182352
RB_GUP	TOTAL	1.00000000	0.54158699	0.02884295	0.08767543	0.00287757	0.00066055	0.08625957	0.01242730	0.00454519	0.00080816	0.00108469	0.03780461	0.02615082	0.00247843	0.12655845	0.01769361	0.00044043	0.01998515	0.00231989
Hot EPIS	PRODUCTION	869,156,659	404,388,326	16,231,965	70,424,066	2,162,857	590,624	73,070,777	12,278,438	5,704,958	1,230,012	900,737	37,490,740	35,258,995	3,940,232	174,854,283	29,136,334	368,006	962,385	162,916
	BULKTRAN	226,657,003	105,455,610	4,232,941	18,365,053	564,026	154,022	19,055,257	3,201,847	1,487,728	320,760	234,892	9,776,783	8,194,773	1,027,526	45,596,166	7,589,117	95,968	250,969	42,485
	SUBTRAN	95,834,694	42,915,750	1,709,756	7,348,126	226,387	82,486	7,624,006	1,282,872	786,312	-	94,895	3,923,226	5,106,343	-	24,506,423	-	39,104	191,583	17,213
	DISTPRI	253,206,003	170,484,098	6,500,538	27,690,945	842,158	-	27,656,876	4,839,033	-	-	365,061	14,420,151	-	-	-	-	147,532	391,430	66,263
	DISTSEC	167,835,997	123,859,530	6,360,444	18,354,529	-	-	16,274,676	-	-	-	210,964	-	-	-	-	-	80,875	1,607,642	287,136
	ENERGY	1,586,656	568,200	33,573	124,773	3,794	1,057	138,514	23,081	10,837	2,311	1,997	82,336	67,198	9,927	429,987	77,324	941	10,953	2,043
	CUSTOMER	74,312,367	33,519,150	8,577,609	2,695,069	895,404	295,967	944,176	308,053	559,881	83,629	2,510	159,511	755,850	125,445	543,584	125,445	4,030	22,306,496	2,410,448
	TOTAL	1,680,589,459	881,168,663	44,246,824	145,202,561	4,694,625	1,124,168	144,786,481	21,733,425	8,549,517	1,636,712	1,811,156	65,922,827	50,383,158	5,103,130	245,932,464	36,837,230	736,455	25,631,558	2,988,505
NP	PRODUCTION	0.51472349	0.23948291	0.00961274	0.04170585	0.00128087	0.00034977	0.04327326	0.00727142	0.00337853	0.00072843	0.00053343	0.02220240	0.02088074	0.00233345	0.10355051	0.01725484	0.00021784	0.00056903	0.00009648
NP	BULKTRAN	0.13422860	0.06245189	0.00250679	0.01087597	0.00033402	0.00009121	0.01128472	0.00188623	0.00088105	0.00018996	0.00011911	0.00578990	0.00544524	0.00060851	0.02706370	0.00449968	0.00005683	0.00014863	0.00002516
NP	SUBTRAN	0.05675429	0.02541515	0.00101254	0.00435184	0.00013407	0.00004880	0.00451501	0.00075973	0.00046566	-	0.00005626	0.00023483	0.00024203	-	0.01451295	-	0.00002216	0.00001019	0.00003924
NP	DISTPRI	0.14895124	0.10096243	0.00384969	0.01639886	0.00049873	-	0.01637987	0.00274728	-	-	0.00021619	0.00853976	-	-	-	-	0.00008737	0.00021181	0.00003924
NP	DISTSEC	0.09939420	0.07315088	0.00412205	0.01098818	0.00109881	-	0.00995815	-	-	-	0.00012494	-	-	-	-	-	0.00004790	0.00009206	0.00017005
NP	ENERGY	0.00093963	0.00033531	0.00001988	0.00007389	0.00000225	0.00000063	0.00008203	0.00001367	0.00000630	0.00000137	0.00000118	0.00004876	0.00003980	0.00000588	0.00002546	0.00004580	0.00000056	0.00000649	0.00000121
NP	CUSTOMER	0.04400855	0.01985038	0.00567975	0.00159605	0.00053027	0.00017527	0.00055915	0.00018243	0.00033157	0.00004953	0.00000149	0.00004476	0.00007429	0.00003192	0.00007429	0.000007429	0.00000239	0.01321014	0.00142749
NP	TOTAL	1.00000000	0.52184897	0.02620342	0.08599045	0.00278021	0.00066574	0.08573220	0.01287076	0.00506311	0.00096928	0.00107259	0.03904017	0.02983742	0.00302213	0.14564373	0.02187461	0.00043614	0.01517927	0.00176982

KENTUCKY POWER COMPANY
 COST-OF-SERVICE STUDY
 TWELVE MONTHS ENDING
 MARCH 31, 2013

Case No.: 2013-00197
 Exhibit No.: JMS-1
 Page 21 of 30
 Witness: J. Stegall

ALLOCATOR	FUNCTION	Total	RS	SGS	MGS-SEC	MGS-PRI	MGS-SUB	LGS-SEC	LGS-PRI	LGS-SUB	LGS-TRA	QP-SEC	QP-PRI	QP-SUB	QP-TRA	CIP-TOD-SUB	CIP-TOD-TRA	MW	OL	SL
Acct 500-503	PRODUCTION	7,138,616	3,321,340	133,317	578,412	17,764	4,851	600,150	100,846	46,856	10,102	7,388	307,921	289,592	32,362	1,436,125	239,304	3,023	7,904	1,338
	BULKTRAN	4,222,304	1,964,491	78,854	342,115	10,507	2,869	354,973	59,648	27,714	5,975	4,376	182,127	171,286	19,141	849,430	141,542	1,788	4,675	791
	SUBTRAN	1,783,818	790,812	31,825	136,774	4,214	1,536	141,809	23,879	14,636	-	1,788	74,328	95,047	-	456,150	-	728	1,893	320
	DISTPRI	19,751,042	13,298,411	507,067	2,160,000	65,692	-	2,157,498	361,862	-	-	28,478	1,124,827	-	-	-	-	11,508	30,533	5,169
	DISTSEC	12,187,407	8,994,057	505,432	1,347,337	-	-	1,181,800	-	-	-	15,319	-	-	-	-	-	5,873	116,739	20,850
	ENERGY	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
	CUSTOMER	2,001,290	798,997	270,121	85,127	39,997	13,208	38,465	13,770	24,987	3,733	102	7,134	33,733	5,599	24,264	5,599	127	445,352	190,975
	TOTAL	47,084,478	29,176,118	1,526,616	4,649,765	138,174	22,464	4,474,795	560,005	114,194	19,811	57,439	1,696,338	589,657	57,103	2,765,969	386,446	23,946	697,696	210,444
TDOMX	PRODUCTION	0.15161294	0.07054022	0.00283145	0.01228455	0.00037728	0.00010303	0.01274624	0.00214181	0.00099515	0.00021456	0.00015712	0.00653977	0.00615047	0.00068732	0.03050103	0.00508245	0.00006419	0.00016788	0.00002842
TDOMX	BULKTRAN	0.08967507	0.04172269	0.00167473	0.00726599	0.00022315	0.00006094	0.00753906	0.00126863	0.00058961	0.00012691	0.00003755	0.00157861	0.00201866	-	0.01804056	0.00300614	0.00003797	0.00009629	0.00001681
TDOMX	SUBTRAN	0.03788548	0.01696550	0.00067590	0.00290487	0.00008950	0.00003261	0.00301393	0.00050715	0.00031065	-	-	-	-	-	-	-	0.00001546	0.00064847	0.00010978
TDOMX	DISTPRI	0.41948097	0.28243727	0.01076930	0.04567498	0.00139518	-	0.04562185	0.00768538	-	-	-	0.00060479	0.02386955	-	-	-	0.00012473	0.00247935	0.00042833
TDOMX	DISTSEC	0.25884129	0.19101957	0.01073459	0.02861531	-	-	0.02509956	-	-	-	-	-	-	-	-	-	-	-	-
TDOMX	ENERGY	0.04250425	0.01696944	0.00573693	0.00180796	0.00084948	0.00028052	0.00061660	0.00029246	0.00053069	0.00007928	0.00000217	0.00015152	0.00071644	0.00011892	0.00051532	0.00011892	0.00000270	0.00945857	0.00405600
TDOMX	CUSTOMER	0.00000000	0.00000000	0.00000000	0.00000000	0.00000000	0.00000000	0.00000000	0.00000000	0.00000000	0.00000000	0.00000000	0.00000000	0.00000000	0.00000000	0.00000000	0.00000000	0.00000000	0.00000000	0.00000000
TDOMX	TOTAL	1.00000000	0.61965469	0.03242290	0.09875366	0.00293459	0.00047709	0.09503757	0.01189363	0.00242530	0.00042075	0.00121992	0.03602754	0.01252339	0.00121278	0.05874482	0.00820751	0.00046946	0.01289376	0.00466064

Kentucky Power Company
 Proposed Revenue Allocation
 Twelve Months Ended March 31, 2013

Current Class (1)	Current Revenue (2)	Rate Base (3)	Current Income (4)	Current ROR % (5)	Proposed Revenue Allocation							
					Income Increase (6)	Income (7)	ROR % (8)	Revenue Increase (9)	Less: Adjust Trans to OATT (10)	Sales Revenue (11)	Percent Increase (12)	
RS	201,020,022	779,459,548	13,581,142	1.74	36,825,891	50,407,033	6.47	60,126,409	(2,427,414)	263,573,845	31.12	
SGS	16,112,073	39,350,762	3,594,707	9.14	1,859,143	5,453,850	13.86	3,035,462	498,306	18,649,229	15.75	
MGS	51,869,508	135,554,227	11,113,008	8.20	6,404,317	17,517,325	12.92	10,456,463	1,975,425	60,350,546	16.35	
LGS	60,560,038	161,359,563	11,008,172	6.82	7,623,500	18,631,672	11.55	12,447,048	1,867,582	71,139,504	17.47	
QP	42,962,656	114,488,775	5,551,569	4.85	5,409,070	10,960,639	9.57	8,831,502	912,679	50,881,479	18.43	
CIP-TOD	105,929,360	270,928,270	8,816,536	3.25	12,800,119	21,616,655	7.98	20,899,023	915,389	125,912,994	18.87	
MW	307,392	685,463	73,134	10.67	32,385	105,519	15.39	52,876	17,355	342,913	11.56	
OL	7,418,693	22,463,117	1,800,602	8.02	1,061,281	2,861,883	12.74	1,732,775	23,693	9,127,775	23.04	
SL	1,222,039	2,698,901	319,691	11.85	127,511	447,202	16.57	208,190	7,903	1,422,325	16.39	
Total	487,401,782	1,526,988,628	55,858,560	3.66	72,143,217	128,001,777	8.38	117,789,748	3,790,918	601,400,612	23.39	
									Net Revenue Increase	113,998,830		

Gross Rev Conversion Factor: 1.632721

**Kentucky Power Company
 Proposed Revenue Allocation
 Twelve Months Ended March 31, 2013**

<u>Current Class</u> (1)	<u>Current Revenue</u> (2)	<u>Rate Base</u> (3)	<u>Current Income</u> (4)	<u>Current ROR %</u> (5)	<u>Current Equalized Rate of Return</u>						
					<u>Percent Increase</u> (6)	<u>Revenue Increase</u> (7)	<u>Income Increase</u> (8)	<u>Income</u> (9)	<u>ROR %</u> (10)	<u>Sales Revenue</u> (11)	<u>Current Subsidy</u> (12)=(11)-(2)
RS	201,020,022	779,459,548	13,581,142	1.74	12.13	24,380,053	14,932,160	28,513,302	3.66	225,400,075	24,380,053
SGS	16,112,073	39,350,762	3,594,707	9.14	-21.84	(3,518,877)	(2,155,222)	1,439,485	3.66	12,593,196	(3,518,877)
MGS	51,869,508	135,554,227	11,113,008	8.20	-19.37	(10,048,285)	(6,154,318)	4,958,690	3.66	41,821,223	(10,048,285)
LGS	60,560,038	161,359,563	11,008,172	6.82	-13.76	(8,335,856)	(5,105,500)	5,902,672	3.66	52,224,182	(8,335,856)
QP	42,962,656	114,488,775	5,551,569	4.85	-5.18	(2,226,167)	(1,363,471)	4,188,098	3.66	40,736,489	(2,226,167)
CIP-TOD	105,929,360	270,928,270	8,816,536	3.25	1.69	1,786,612	1,094,254	9,910,790	3.66	107,715,972	1,786,612
MW	307,392	685,463	73,134	10.67	-25.53	(78,467)	(48,059)	25,075	3.66	228,925	(78,467)
OL	7,418,693	22,463,117	1,800,602	8.02	-21.54	(1,598,242)	(978,882)	821,720	3.66	5,820,451	(1,598,242)
SL	1,222,039	2,698,901	319,691	11.85	-29.52	(360,771)	(220,963)	98,728	3.66	861,268	(360,771)
Total	487,401,782	1,526,988,628	55,858,560	3.66	0.00	0	(0)	55,858,560	3.66	487,401,782	0

Gross Rev Conversion Factor: 1.632721

Kentucky Power Company
 Proposed Revenue Allocation
 Twelve Months Ended March 31, 2013

Current Class (1)	Current Revenue (2)	Rate Base (3)	Current Income (4)	Current ROR % (5)	Proposed Equalized Rate of Return					Sales Revenue (11)	100% of Current Subsidy (12)	Proposed Increase (13)=(7)-(12)	Percent Increase (14)
					Percent Increase (6)	Revenue Increase (7)	Income Increase (8)	Income (9)	ROR % (10)				
RS	201,020,022	779,459,548	13,581,142	1.74	42.04	84,506,462	51,758,054	65,339,196	8.38	285,526,484	24,380,053	60,126,409	29.91
SGS	16,112,073	39,350,762	3,594,707	9.14	-3.00	(483,415)	(296,079)	3,298,628	8.38	15,628,658	(3,518,877)	3,035,462	18.84
MGS	51,869,508	135,554,227	11,113,008	8.20	0.79	408,178	249,999	11,363,007	8.38	52,277,686	(10,048,285)	10,456,463	20.16
LGS	60,560,038	161,359,563	11,008,172	6.82	6.79	4,111,192	2,518,000	13,526,172	8.38	64,671,230	(8,335,856)	12,447,048	20.55
QP	42,962,656	114,488,775	5,551,569	4.85	15.37	6,605,335	4,045,599	9,597,168	8.38	49,567,991	(2,226,167)	8,831,502	20.56
CIP-TOD	105,929,360	270,928,270	8,816,536	3.25	21.42	22,685,635	13,894,373	22,710,909	8.38	128,614,995	1,786,612	20,899,023	19.73
MW	307,392	685,463	73,134	10.67	-8.33	(25,591)	(15,674)	57,460	8.38	281,801	(78,467)	52,876	17.20
OL	7,418,693	22,463,117	1,800,602	8.02	1.81	134,533	82,398	1,883,000	8.38	7,553,226	(1,598,242)	1,732,775	23.36
SL	1,222,039	2,698,901	319,691	11.85	-12.49	(152,581)	(93,452)	226,239	8.38	1,069,458	(360,771)	208,190	17.04
Total	487,401,782	1,526,988,628	55,858,560	3.66	24.17	117,789,748	72,143,219	128,001,779 ^(a) 128,001,779	8.38	605,191,530	0	117,789,748	24.17

Gross Rev Conversion Factor: 1.632721

(a) Required net operating income from Section V, Schedule 2, Column (3), Line 3



COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

**THE APPLICATION FOR A GENERAL
ADJUSTMENT OF ELECTRIC RATES
OF KENTUCKY POWER COMPANY**

)
) **Case No. 2013-00197**
)

DIRECT TESTIMONY OF

ALEX E. VAUGHAN

ON BEHALF OF KENTUCKY POWER COMPANY

VERIFICATION

The undersigned, Alex E. Vaughan, being duly sworn, deposes and says he is the Manager, Regulatory Pricing and Analysis that he has personal knowledge of the matters set forth in the forgoing testimony and the information contained therein is true and correct to the best of his information, knowledge and belief.

Alex E. Vaughan

Alex E. Vaughan

STATE OF OHIO

)

) Case No. 2013-00197

County of FRANKLIN

)

Subscribed and sworn to before me, a Notary Public in and before said County and State, by Alex E. Vaughan, this the 18th day of June, 2013.

Ellen A. McAninch

Notary Public

My Commission Expires: May 11th, 2016



ELLEN A. MCANINCH
NOTARY PUBLIC
STATE OF OHIO
Recorded in
Franklin County
My Comm. Exp. 5/11/16

**DIRECT TESTIMONY OF
ALEX E. VAUGHAN, ON BEHALF OF
KENTUCKY POWER COMPANY
BEFORE THE PUBLIC SERVICE COMMISSION OF KENTUCKY**

CASE NO. 2013-00197

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**DIRECT TESTIMONY OF
ALEX E. VAUGHAN
FOR KENTUCKY POWER COMPANY
BEFORE THE PUBLIC SERVICE COMMISSION OF KENTUCKY
CASE NO. 2013-00197**

I. INTRODUCTION

1 **Q. PLEASE STATE YOUR NAME, BUSINESS ADDRESS AND PRESENT**
2 **POSITION.**

3 A. My name is Alex E. Vaughan. I am employed by American Electric Power Service
4 Corporation (“AEPSC”) as Manager-Regulated Pricing and Analysis. My business
5 address is 1 Riverside Plaza, Columbus, Ohio 43215. AEPSC is a wholly-owned
6 subsidiary of American Electric Power Company (“AEP”), the parent Company of
7 Kentucky Power Company (the “Company” or “Kentucky Power”).

8 **Q. PLEASE DESCRIBE YOUR CURRENT RESPONSIBILITIES.**

9 A. My responsibilities include the oversight of cost of service analyses, rate design and
10 special contracts for the AEP East System operating companies.

11 **Q. PLEASE SUMMARIZE YOUR PROFESSIONAL EXPERIENCE AND**
12 **EDUCATIONAL BACKGROUND.**

13 A. I graduated from Bowling Green State University with a Bachelor of Science degree in
14 Finance in 2005. Prior to joining AEP I worked for a retail bank and a holding company
15 where I held various underwriting, finance and accounting positions. In 2007 I joined
16 AEPSC as a Settlement Analyst in the Regional Transmission Organization (RTO)
17 Settlements Group. I later became the PJM Settlements Lead Analyst where I was
18 responsible for reconciling AEP’s settlement of its activities in the PJM market with the
19 monthly PJM invoices and for resolving billing issues with PJM. In 2010 I transferred to

1 Regulatory Services as a Regulatory Analyst and was later promoted to the position of
2 Regulatory Consultant. My responsibilities included supporting regulatory filings across
3 AEP's 11 state jurisdictions and at the Federal Energy Regulatory Commission (FERC).
4 In addition, I was responsible for performing financial analyses related to AEP's
5 generation resources and loads, power pools and PJM. In September of 2012, I was
6 promoted to my current position.

7 **Q. HAVE YOU PREVIOUSLY TESTIFIED IN REGULATORY PROCEEDINGS?**

8 A. Yes. I submitted direct testimony to the Indiana Utility Regulatory Commission in Cause
9 No. 43774-PJM-3 on behalf of Indiana Michigan Power Company, a Kentucky Power
10 affiliate. I have also submitted testimony to the Virginia State Corporation Commission
11 in case numbers PUE-2012-00094 and PUE-2013-00009 on behalf of Appalachian Power
12 Company, also a Kentucky Power affiliate.

II PURPOSE OF TESTIMONY

13 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?**

14 A. The purpose of my testimony is to sponsor certain rate base and operation and
15 maintenance expense adjustments detailed in Section V. Among these are adjustments
16 related to the proposed transfer of a 50% undivided interest in the Mitchell Plant from
17 Ohio Power Company (OPCo) to Kentucky Power, adjustments to the test year amount of
18 PJM charges and credits to reflect the termination of the AEP East Pool on January 1,
19 2014, and adjustments to annualize the current level of certain PJM charges.

20 Along with other witnesses in this proceeding, I sponsor the "per books" test year cost of
21 service study for the Mitchell Plant. I also support the proposed PJM Rider and the

1 Company's proposed treatment of transmission function revenues and expenses in base
2 rates.

3 **Q. ARE YOU SPONSORING ANY EXHIBITS OR SCHEDULES?**

4 A. Yes, I am sponsoring the following exhibits:

5 - Exhibit AEV 1 - List of PJM Charges and Credits with Descriptions

6 - Exhibit AEV 2 - Adjusted Test Year PJM Charge and Credit Detail

7 - Exhibit AEV 3 - PJM Rider rate design

8 - Exhibit AEV 4 – Mitchell Plant Cost of Service Summary

9 **III. MITCHELL PLANT COST OF SERVICE STUDY**

10 **Q. PLEASE EXPLAIN THE COST OF SERVICE STUDY PERFORMED FOR THE
11 MITCHELL PLANT.**

12 A. The Mitchell Plant cost of service study is a “per books” representation of the test year
13 costs, assets and liabilities related to the Mitchell Plant. It is summarized by balance
14 sheet items, more generically referred to as “rate base”, and income statement items
15 which in this case are mostly operational expenses and taxes. Since the Company does
16 not keep a separate set of books for each generating plant, a cost of service study must be
17 performed in order to examine a single plant or unit in isolation. Specifically, I am
18 supporting the income statement portion of the Mitchell plant cost of service. These
19 items can be generically referred to as the “operating expenses” of the plant.

20 **Q. HOW WAS YOUR PORTION OF THE MITCHELL COST OF SERVICE STUDY
21 PERFORMED?**

22 A. For the test year in this case, the Mitchell Plant was owned by Kentucky Power's affiliate
Ohio Power Company (OPCo). The books and records of OPCo's generation business

1 unit were used to directly assign or allocate the income statement items to the Mitchell
2 plant.

3 **Q. WHY WERE SOME ITEMS ALLOCATED TO THE MITCHELL PLANT?**

4 A. Not all Mitchell plant operating expenses are recorded directly to the Mitchell plant on
5 OPCo's books. Some expenses are recorded to "common locations" which represent
6 costs attributable to all of OPCo's generating plants including Mitchell. If the cost of
7 service study only used the costs directly recorded to the Mitchell plant; it would not be a
8 complete representation of the test year level of operating expenses for Mitchell.

9 **Q. WHEN NECESSARY, HOW WERE THE ALLOCATIONS TO THE MITCHELL
10 PLANT PERFORMED?**

11 A. First, the various FERC accounts that make up Mitchell's operating expenses were
12 classified as either demand or energy related. Then demand and energy allocation factors
13 were developed for each of OPCo's common generation plant locations that needed to be
14 allocated to Mitchell. Finally, the applicable Mitchell allocation factors were applied to
15 the FERC account totals for each of the OPCo generation common locations to produce
16 Mitchell plant's portion of the shared operating expenses.

17 **Q. WHAT WERE THE COST OF SERVICE STUDY RESULTS USED FOR?**

18 A. The results of the Mitchell cost of service study were used to calculate adjustment W59
19 to the Kentucky jurisdictional cost of service study which adds the test year level of
20 Kentucky Power's 50% share of the Mitchell plant operating expenses and rate base to
21 the Kentucky Power per books test year totals.

IV. PJM RIDER

1 **Q. WHAT DOES THE COMPANY PROPOSE TO INCLUDE IN THE PJM RIDER?**

2 A. The Company is proposing to include various PJM Open Access Transmission Tariff
3 (OATT), energy, ancillary and administrative service charges and credits that it incurs
4 from its participation as a load serving entity (LSE) and generation resource owner in the
5 organized wholesale power markets of the PJM RTO.

6 **Q. WHAT SPECIFIC PJM CHARGE AND CREDIT ITEMS ARE THE COMPANY
7 PROPOSING TO INCLUDE IN THE PJM RIDER?**

8 A. The Company is proposing to include all of its LSE PJM charges and credits which are
9 currently made up of but not limited to the following items: congestion, FTRs, meter
10 corrections, operating reserve, inadvertent energy, economic load response, synchronous
11 condensing, reactive service, black start service, regulation, synchronized reserve, day
12 ahead scheduling reserve, peak hour availability, market defaults and administrative
13 services. LSE PJM marginal loss charges and the marginal loss over collection credits
14 will not be included since they are included in the Company's fuel clause.
15 The Company is also proposing to include the following PJM LSE transmission items:
16 network integration transmission service (NITS) charges, transmission owner scheduling
17 system control and dispatch service (TO) charges, regional transmission expansion plan
18 (RTEP) charges, point-to-point (PTP) transmission service credits, RTO start-up cost
19 recovery charges and expansion cost recovery (ECRC) charges. The Company also
20 proposes to include any new PJM LSE charges or credits that may arise and be billed to
21 the Company per the PJM tariffs.

1 Exhibit AEV 1 includes a more detailed description of these charges and credits, how
2 PJM allocates or assigns them to Kentucky Power and what FERC accounts they are
3 recorded in.

4 **Q. IS THE COMPANY PROPOSING TO REMOVE THESE PJM CHARGES AND**
5 **CREDITS FROM BASE RATES ENTIRELY?**

6 A. No. The Company is proposing to include an adjusted test year level of the applicable
7 PJM charges and credits in base rates. The PJM Rider would then on a monthly basis
8 track the amount of PJM charges and credits above or below the base rate level as
9 discussed further by Company Witness Mitchell. The annual net over or under collection
10 of PJM charges would then be collected from or credited to customers through the PJM
11 Rider.

12 **Q. WHY IS THE COMPANY PROPOSING A TRACKING MECHANISM FOR**
13 **THESE PJM CHARGES AND CREDITS?**

14 A. These PJM charges and credits can have a material financial impact on the Company; the
15 annual level of such charges and credits can vary greatly and they are largely out of the
16 Company's control. This volatility can be attributed to various economic conditions,
17 wholesale power market trends and even tariff changes made by PJM.

18 **Q. ARE THERE ANY ADDITIONAL REASONS FOR INCLUDING THE PJM**
19 **CHARGES AND CREDITS IN A TRACKING MECHANISM?**

20 A. Yes. In the near term Kentucky Power is going to be experiencing several changes that
21 will have a significant impact on the level of PJM charges and credits it incurs. Such
22 changes include the termination of the AEP East Pool agreement and the proposed
23 transfer of a 50% interest in the Mitchell plant on January 1, 2014; the scheduled

1 retirement of Big Sandy unit 2 on June 1, 2015 and the yet undetermined future of Big
2 Sandy unit 1. Further, there is expected to be a sustained amount of investment to the
3 PJM transmission grid, which will increase transmission charges allocated to Kentucky
4 Power. Tracking these PJM charges and credits via the PJM Rider could potentially
5 reduce the frequency with which Kentucky Power may need to file costly general rate
6 proceedings as these PJM charges and credits change.

7 **Q. WILL ALL KPCO PJM CHARGES AND CREDITS BE INCLUDED IN THE**
8 **ADJUSTED BASE RATE AMOUNT THAT WILL BE TRACKED BY THE**
9 **PROPOSED PJM RIDER?**

10 A. No. Only the amount of each charge and credit attributable to the internal load of
11 Kentucky Power would be included. Kentucky Power incurs these charges and credits by
12 acting as an LSE in PJM. Kentucky Power also incurs PJM charges and credits when it
13 makes off system sales (OSS) in PJM. The amount of PJM charges and credits
14 associated with making OSS are currently and will continue to be included in the
15 determination of the Company's System Sales Rider.

16 **Q. WHAT IS THE PROPOSED LEVEL OF PJM CHARGES AND CREDITS TO BE**
17 **INCLUDED IN BASE RATES?**

18 A. The adjusted test year Kentucky retail jurisdictional total is \$56,550,649. The line item
19 detail behind this figure can be seen in AEV Exhibit 2.

20 **Q. IF THE COMMISSION APPROVES THE PROPOSED PJM RIDER, WHEN**
21 **WOULD THE COMPANY PROPOSE TO UPDATE THE PJM RIDER RATES?**

22 A. As I previously indicated, the PJM Rider is designed to true-up the actual incurred PJM-
23 related costs relative to the amount in the Company's base rates. As a result, the rider

1 will be set at \$0 until after the first year the base rates are in effect. After that it will be
2 trued-up annually. The Company proposes filing the required true-up information
3 beginning no later than March 31, 2015 and by March 31st of each subsequent year.

4 **Q. PLEASE EXPLAIN THE COMPANY'S PROPOSED RATE DESIGN FOR THE**
5 **PJM RIDER.**

6 A. The annual net over or under recovery of PJM charges and credits compared to the
7 approved base rate level would be separated into demand and energy costs to be allocated
8 to the customer classes. The demand and energy classifications for each PJM charge can
9 be found in Exhibit AEV 2. The customer class revenue requirements would then be
10 divided by historic class kWh energy sales to produce a \$/kWh rate to be collected from
11 or refunded to customers. If approved, this PJM Rider would have a first year revenue
12 requirement of \$0 since the Company is seeking to include the adjusted test year level of
13 PJM charges and credits in base rates in this proceeding. Exhibit AEV 3 shows the
14 mechanics of the proposed rate design.

15 **V. TREATMENT OF TRANSMISSION FUNCTION REVENUES AND EXPENSES**

16 **Q. PLEASE EXPLAIN THE COMPANY'S PROPOSED TREATMENT OF**
17 **TRANSMISSION REVENUES AND EXPENSES IN BASE RATES.**

18 A. The Company proposes that its transmission costs should be based upon the charges it
19 incurs as an LSE under PJM's OATT. These costs, which are included in the proposed
20 PJM Rider, would be what Kentucky retail customers pay for transmission service rather
21 than the Company's embedded cost of transmission service. The embedded cost of
22 transmission service and other transmission revenues would be removed from the

1 Company's cost of service, with the PJM OATT charges remaining as the cost for
2 transmission service.

3 **Q. PLEASE EXPLAIN WHY THE COSTS PAID BY RATEPAYERS SHOULD BE**
4 **BASED ON THE PJM OATT CHARGES?**

5 A. Customer's transmission costs should be based upon the charges under the PJM OATT
6 for a number of reasons:

- 7 • Kentucky Power is charged by PJM for transmission service regardless of facility
8 ownership.
- 9 • Kentucky Power no longer has exclusive control over its transmission costs
10 because of its membership in PJM;
- 11 • Kentucky Power's transmission rates would be comparable to other customers
12 within the AEP transmission Zone;
- 13 • It provides proper separation of Kentucky Power's costs to provide retail service
14 as an LSE from the costs and wholesale revenues as a transmission owner; and
15 under the Company's proposal, the rates Kentucky customers pay for retail
16 electric service will better reflect the transmission service costs that Kentucky
17 Power incurs as their LSE.

18 **Q. WHAT IS THE PROPOSED LEVEL OF PJM OATT CHARGES TO BE**
19 **INCLUDED IN BASE RATES?**

20 A. The adjusted test year Kentucky retail jurisdictional total cost is \$43,097,768. This
21 amount is a subset of the \$56,550,649 already identified above as the base level to be
22 tracked by the proposed PJM Rider. The line item detail behind this figure can be seen in
23 AEV Exhibit 2 (lines 23-32, column J).

1 **Q. WHAT IS THE NET EFFECT OF THE COMPANY'S PROPOSED CHANGE TO**
2 **THE TREATMENT OF TRANSMISSION REVENUES AND EXPENSES?**

3 A. The net effect of the Company's proposed treatment is a reduction in cost to Kentucky
4 ratepayers of \$3,709,919 as can be seen in column 10 of page 1 of Company witness
5 Stegall's Exhibit JMS3.

VI. ADJUSTMENTS

6 **Q. WHAT ADJUSTMENTS ARE YOU SPONSORING?**

7 A. I am sponsoring the operating expense portion of adjustment W59 which adds the per
8 books test year level of Kentucky Power's proposed 50% share of the Mitchell Plant to
9 the Company's cost of service. I am also sponsoring adjustment W60 which adjusts
10 Kentucky Power's test year PJM charges and credits to account for the termination of the
11 AEP East Interconnection Agreement (Pool Agreement) on January 1, 2014, the
12 proposed Mitchell plant asset transfer, and the annualization of the current level of certain
13 PJM charges.

Mitchell Plant Transfer Adjustment
(Section V, Workpaper S-4, Page 59)

14 **Q. PLEASE EXPLAIN THE ADJUSTMENT TO ADD THE PER BOOKS LEVEL OF**
15 **MITCHELL PLANT OPERATING EXPENSES AND RATE BASE TO THE**
16 **TEST YEAR.**

17 A. This adjustment adds Kentucky Power's proposed 50% share of Mitchell plant test year
18 operating expenses and rate base to the cost of service. I am sponsoring the operating
19 expense portion of this adjustment and the calculation of cash working capital in rate
20 base, Company witnesses Mitchell and Bartsch are sponsoring the remaining rate base
21 items. Operating expenses include the following items:

- 1 • Fuel related items in FERC account 501 other than coal and oil expense. This
2 includes items such as fuel handling that are not included in the Company's fuel
3 clause.
- 4 • Operating expenses in FERC accounts 500 – 509 (scrubber chemicals, emission
5 allowance expense, steam expenses, electric expenses, etc.)
- 6 • Maintenance expenses in FERC accounts 510 – 514 (maintenance of structures,
7 boiler plant, electric plant, etc.)
- 8 • Applicable administrative and general expenses in FERC account 920 – 935
9 (property insurance, group medical plan premiums, post-retirement benefits, etc.)
- 10 • Taxes other than income taxes FERC account 408 (unemployment taxes, payroll
11 taxes, property taxes, etc.)
- 12 • Depreciation expense in FERC account 403

13 **Q. WHY DID YOU EXCLUDE COAL AND FUEL OIL EXPENSES FOR**
14 **MITCHELL?**

15 A. Test year coal and fuel oil expenses were not included in the calculation of this
16 adjustment because they are not base rate items and will be included in the calculation of
17 the Company's fuel clause after January 1, 2014.

18 **Q. HOW WAS THIS ADJUSTMENT CALCULATED?**

19 A. The results of the Mitchell plant cost of service study were allocated to the Kentucky
20 retail jurisdiction using the same allocators and allocation methodologies included in the
21 Company's per books jurisdictional cost of service study (section V). Since there were
22 no Mitchell plant operating expenses in the Kentucky Power per books test year cost of

1 service, the adjustment is the Kentucky retail jurisdictional amounts allocated from the
2 Mitchell plant cost of service study.

3 **Q. WHAT IS THE TOTAL OF TEST YEAR MITCHELL OPERATING EXPENSES**
4 **INCLUDED IN THE MITCHELL PLANT TRANSFER ADJUSTMENT?**

5 A. As can be seen in Exhibit AEV 4, the total Kentucky retail jurisdiction Mitchell plant
6 operating expenses for the test year are \$76,352,468. This figure excludes coal and fuel
7 oil expense and represents Kentucky Power's proposed 50% share of the total Mitchell
8 plant. These operating expenses break down as follows:

- 9 • Total operation and maintenance expense including related administrative
10 and general expenses: \$38,356,274;
- 11 • Depreciation expense: \$32,967,772 (as provided to me by Company
12 witness Davis); and
- 13 • Taxes other than income taxes: \$5,028,422.

PJM Charge Adjustment
(Section V, Workpaper S-4, Page 60)

14 **Q. PLEASE EXPLAIN THE ADJUSTMENT TO PJM CHARGES AND CREDITS**
15 **TO REFLECT THE AEP EAST POOL TERMINATION AND THE MITCHELL**
16 **PLANT TRANSFER.**

17 A. Currently the Pool Agreement settlement allocates the total PJM charges and credits to
18 the four member operating companies based upon their member load ratio (MLR). The
19 MLR is a non-coincident peak demand calculation based on each Pool member's internal
20 load peak on a historic twelve month basis. The MLR allocation is used for all PJM
21 charges and credits except for the PJM OATT charges and credits which are allocated
22 based on the AEP East Transmission Agreement (TA) which went into effect in

1 November of 2010. The MLR allocation of PJM charges will end when the Pool
2 Agreement terminates on January 1, 2014. After termination of the Pool Agreement,
3 Kentucky Power's PJM charges and credits that had been allocated based on the MLR
4 will be directly assigned to Kentucky Power. This change from an MLR allocation of
5 total East Pool PJM charges and credits to direct assignment of Kentucky Power's PJM
6 charges and credits will impact the overall level of net PJM charges Kentucky Power
7 incurs. Also included in this adjustment are 50% of the Mitchell plant's PJM charges and
8 credits to reflect the Company's proposed asset transfer.

9 Adjustment W60 increases test year total company Kentucky Power O&M expense by
10 \$10,006,118, or \$9,893,033 on a Kentucky PSC jurisdictional basis as can be seen in
11 Exhibit AEV 2.

12 **Q. HOW WERE THESE ADJUSTMENTS CALCULATED?**

13 A. Using the Company's books and records along with information provided by PJM's
14 market settlements reporting system (MSRS) we were able to re-settle the test year PJM
15 charges and credits as if Kentucky Power were stand alone in PJM with a 50% share of
16 the Mitchell plant. PJM charges and credits associated with Kentucky Power's
17 generating resources (Big Sandy Units 1&2, 50% of Mitchell Units 1&2 and 15% of
18 Rockport Units 1&2) were identified and directly assigned to Kentucky Power.
19 During the test year, the internal load of the East Pool member companies was managed
20 in PJM for settlement purposes as one load. For PJM charges and credits related to load
21 an hourly allocation of the total East Pool load charges and credits was developed. This
22 was done by taking the hourly internal loads of each individual member company and
23 dividing it by the total East Pool hourly internal load to produce an hourly allocation

1 factor. This internal load energy allocation methodology was used for most PJM load
2 charges and credits. A similar demand allocation was also developed using the network
3 service peak loads (NSPL) of the member companies to allocate financial transmission
4 rights (FTRs). The use of these internal load energy and demand allocation factors
5 mimics how PJM would assign the applicable load charges and credits to Kentucky
6 Power if it had been stand-alone in PJM during the test year. For purposes of this stand-
7 alone re-settlement, Kentucky Power received its allocated share of the total East Pool
8 internal load PJM charges and credits.

9 The new Kentucky Power stand-alone test year level (including the applicable Mitchell
10 plant charges and credits) of PJM charges and credits was compared to the Kentucky
11 Power per books test year amounts by FERC account. The difference between the two is
12 the “pool termination and Mitchell plant” PJM charges and credits adjustment amount.
13 This portion of adjustment W60 increases total company Kentucky Power test year O&M
14 expense by \$4,594,012.

15 **Q. PLEASE EXPLAIN THE ADJUSTMENT TO ANNUALIZE THE CURRENT**
16 **LEVEL OF PJM BLACKSTART SERVICE CHARGES.**

17 A. Kentucky Power is currently and will continue to incur a higher level of charges for PJM
18 blackstart service due to a recent PJM tariff change. The tariff change occurred in
19 November of 2012 and began effecting monthly PJM settlements in December 2012.
20 This change affected how certain make whole payments to generators running
21 uneconomically for reliability purposes are classified and how the resulting charges are
22 allocated to loads in PJM. The allocation change resulted in more costs being allocated
23 to the AEP transmission zone which includes Kentucky Power.

1 **Q. HOW WAS THIS ADJUSTMENT CALCULATED?**

2 A. The Kentucky Power first quarter 2013 actual total (at the stand alone level) for blackstart
3 service charges was annualized and then compared to the test year per books level of
4 blackstart charges. The difference, less the pool termination adjustment for blackstart
5 service, is the adjustment to annualize the current level of PJM blackstart charges. The
6 annualization and pool termination adjustments together equal the total adjustment to test
7 year per books PJM blackstart service charges. This portion of adjustment W60 increases
8 total company Kentucky Power test year O&M expense by \$3,222,825.

9 **Q. PLEASE EXPLAIN THE ADJUSTMENT TO ANNUALIZE THE CURRENT**
10 **LEVEL OF PJM RTEP CHARGES.**

11 A. The purpose of this adjustment is to include the current level of RTEP charges in the cost
12 of service. PJM RTEP charges change for several reasons including when new projects
13 go into service, when revenue requirements are trued up, when projects are cancelled or
14 delayed, and when zonal load changes.

15 **Q. HOW WAS THIS ADJUSTMENT CALCULATED?**

16 A. This adjustment was calculated by multiplying the March 2013 Kentucky Power RTEP
17 charges by twelve to produce an annual amount. That amount was then compared to the
18 test year per books amount and the difference is the adjustment to annualize the current
19 level of PJM RTEP charges. This portion of adjustment W60 increases total company
20 Kentucky Power test year O&M expense by \$2,189,280.

21 **Q. DOES THIS CONCLUDE YOUR PREFILED DIRECT TESTIMONY?**

22 A. Yes.

PJM Charge and Credit Descriptions and Associated LSE FERC Accounts

4470093 – PJM Congestion – LSE

When the Transmission System is scheduled day-ahead or operating real-time under constrained conditions, PJM calculates Congestion Charges for each PJM Member. The basis for the Congestion Charge is the applicable day-ahead or real-time congestion price component of LMPs. PJM calculates day-ahead and real-time locational Congestion Prices each constrained hour. Every PJM Member is charged for the cost of congestion on the Transmission System, based on the difference between the congestion price at the location on the Transmission System where the PJM Member injects energy and the congestion price at the location where the PJM Member withdraws energy.

There are two distinct types of congestion charges in PJM:

Implicit — Implicit Congestion Charges are the congestion charges associated with the congestion price differentials between the PJM Member's generation and scheduled purchases, netted out against its load (excluding losses) and scheduled sales.

Explicit — Explicit Congestion Charges are the congestion charges associated with the congestion price differential from the scheduled source and sink of a transaction.

Transmission Congestion Charges can be both positive and negative.

4470101 – PJM FTR Revenues – LSE

An FTR is a financial instrument that entitles the holder to receive compensation for Transmission Congestion Charges that arise when the Transmission System is congested and differences in day-ahead Congestion Prices result. The purpose of an FTR is to protect the holder from increased energy costs due to transmission congestion. Each FTR is defined from a point of receipt to a point of delivery. For each hour in which congestion exists on the day-ahead Transmission System between the receipt and delivery points specified in the FTR, the holder of the FTR is awarded a share of the Total Transmission Congestion Charges collected from the Market Participants. An FTR's value, therefore, is related to Transmission Congestion Charges.

4470116 – PJM Meter Corrections – LSE

Metering errors and corrections are reconciled at the end of each month by a meter correction charge. Meter correction charges can be both positive and negative.

4470202 – PJM Operating Reserve Credits – LSE

PJM operating reserve credits provide make-whole payments to generators that are called on by PJM for reliability purposes but do not receive sufficient revenue from the energy or ancillary service markets to cover their offer costs. PJM may call on these units either day-ahead or in real-time.

4470203 – PJM Operating Reserve Charges – LSE

PJM operating reserve (OR) charges are the collection of the make-whole payments (operating reserve credits) to generators that are called on by PJM for reliability purposes but do not receive sufficient revenue from the energy or ancillary service markets to cover their offer costs. PJM may call on these units either day-ahead or in real-time.

Day ahead OR charges are allocated to LSE's based on their day ahead load ratio share.

Balancing OR (BOR) charges are divided into two categories; BOR for deviations and BOR for reliability. BOR charges for deviations are allocated to generators, loads and energy transactions based upon real time locational deviations from their day ahead schedules. BOR charges for reliability are allocated to LSEs based upon their real time load ratio share.

5550036 Economic Load Response Charges – LSE

The PJM Load Response Programs are designed to provide compensation to end-use customers or curtailment service providers (CSP) for reduction of consumption when scheduled or dispatched by PJM.

PJM collects these payments from LSE's based upon their real time load ratio share (including exports).

5550036 Emergency Energy – LSE

PJM may purchase energy from outside PJM as needed to alleviate or end an emergency, and may sell energy to another Control Area as requested during emergency conditions in that Control Area. Emergency energy purchased or sold is allocated to PJM Market Participants in proportion to their real-time deviation from their net interchange in the day-ahead market, whenever that deviation increases their spot market purchases or decreases their spot market sales.

5550040 – PJM Inadvertent Interchange – LSE

Inadvertent Interchange is the hourly difference between the net actual energy flow and the net scheduled energy flow into or out of the PJM control area in that hour. This MWh quantity may be a positive or negative value in any given hour and is priced at the PJM load weighted-average LMP for the hour. The value of this energy is allocated to all market participants based on real-time load (excluding losses) ratio shares in the PJM Region. This results in positive or negative Inadvertent Energy charges for each hour. These charges are allocated to LSEs based upon their real time load ratio share.

5550041 – PJM Synchronous Condensing Charges – LSE

PJM sometimes schedules resources for synchronous condensing for purposes other than providing synchronized reserve or reactive services. The credits paid to synchronous condensing resources are then allocated to LSE's based upon their real-time load ratio share.

PJM Reactive Supply and Voltage Control Service:

To maintain transmission voltages within acceptable limits, generation and other resources in PJM are operated to produce or absorb reactive power. Reactive supply and voltage control from generation sources service must be provided for each transaction on the Transmission Provider's transmission facilities.

5550074 – PJM Reactive Charges – LSE

Monthly RTO-wide reactive revenue requirements are allocated as charges to point-to-point (PTP) customers based on their monthly peak usage of the PJM transmission system. The remaining reactive revenue requirements for each transmission zone not recovered from PTP customers are allocated to the network customers serving load in that zone based on their monthly network service peak load contributions

5550075 – PJM Reactive Credits – LSE

Each generation owner receives a monthly Reactive Supply and Voltage Control from Generation Sources Service credit equal to one-twelfth (1/12) of its annual reactive revenue requirement.

Black Start Service:

To ensure the reliable restoration following a shutdown of the PJM Transmission System, black start service is necessary to facilitate the goal of complete system restoration. Black Start Service is the capability of generating units to start without an outside electrical supply or the demonstrated ability of a generating unit with a high operating factor to automatically remain operating at reduced levels when disconnected from the grid. Black Start Service enables the Transmission Provider and Transmission Owners to designate specific generators (Black Start Units) whose location and capabilities are required to re-energize the transmission system following a system-wide blackout

5550076 – PJM Black Start Charges – LSE

The sum of all customers' monthly charges equal one-twelfth (1/12) of the total annual black start revenue requirements that are credited to generation owners of black start units as well as a share of the applicable Day-ahead and Balancing Operating Reserve Credits that are credited to generation owners of black start units for the month. Effective 12/1/2012, the applicable Day-ahead and Balancing Operating Reserve Credits are those credits associated with the scheduling of units for Black Start service or testing of Black Start units.

Monthly RTO-wide reactive revenue requirements and day-ahead and balancing Operating Reserve credits associated with scheduling resources for black start service or testing are allocated as charges to point-to-point (PTP) customers based on their monthly peak usage of the PJM transmission system. The remaining reactive revenue requirements for each transmission zone not recovered from PTP customers are allocated to the network customers serving load in that zone based on their monthly network service peak load contributions.

5550077 – PJM Black Start Credits – LSE

Each generation owner of Black Start Units that meet PJM and NERC criteria receives a monthly Black Start Service credit equal to one-twelfth (1/12) of its annual black start revenue requirement.

PJM Regulation Service:

Regulation is necessary to provide for the continuous balancing of resources (generation and interchange) with load and for maintaining scheduled Interconnection frequency at 60 cycles per second (60 Hz). PJM commits on-line resources whose output is raised or lowered as necessary to follow moment-to-moment changes in load.

5550078 – PJM Regulation Charges – LSE

Each PJM LSE, or other Regulation buyer, is charged for the amount of Regulation purchased to meet their hourly obligation.

5550079 – PJM Regulation Credits – LSE

Each resource supplying PJM-scheduled Regulation is credited for the regulation service provided.

PJM Synchronized Reserve Service:

Synchronized Reserves are supplied from resources located within the metered boundaries of PJM. Resources participating in the reserve market are divided into two tiers. Tier 1 is comprised of all those

resources on-line following economic dispatch and able to ramp up from their current output in response to a synchronized reserve event. Tier 2 consists of the additional resources that are synchronized to the grid and operating at a point that deviates from economic dispatch (including condensing mode) to provide additional synchronized reserve not available from Tier 1 resources. Synchronized Reserve resources include generators and demand side response resources.

The total PJM Synchronized Reserve Requirement is defined as the amount of 10-minute reserve that must be synchronized to the grid in accordance with the applicable NERC Council standards.

5550083 – PJM Synchronized Reserve Charges – LSE

The total cost of providing Synchronized Reserve for each hour is the sum of the credits provided to PJM Members for supplying Synchronized Reserve in that hour. The hourly cost of Tier 1 and Tier 2 Synchronized Reserve is allocated separately and charged to PJM LSEs based upon the amount of Synchronized Reserves purchased to meet their hourly obligation.

5550084 – PJM Synchronized Reserve Credits – LSE

Resources supplying Tier 1 and Tier 2 Synchronized Reserve services receive the applicable credits as calculated by PJM.

5550090 – PJM Day Ahead Scheduling Reserve Charges – LSE

The Day-ahead Scheduling Reserve Market is a construct for a market based mechanism for the procurement of supplemental, 30-minute reserves on the PJM System. The Day-ahead Scheduling [30-Minute] Reserve Market is an offer-based market that will clear existing reserve requirements on a day-ahead, forward basis.

PJM calculates for each hour the Total Cost of Day-ahead Scheduling Reserve by summing the Day-ahead Scheduling Reserve credit for all PJM Members and allocates that amount to LSE's based upon their hourly obligation load ratio share.

5550093 – PJM Peak Hour Availability Charges – LSE

Charges are assessed to capacity resources that fall short of their expected availability during critical peak hours of the delivery year.

5614007 – PJM Market Default Charges – LSE

The cost of PJM market participant defaults are allocated to PJM members and market participants on a case by case basis.

5614001, 5614007, 5618001 & 5757001 – PJM Administrative Service Charges - LSE

PJM charges each market participant on a monthly basis a number of fees to recover its operating and administration costs. PJM also charges fees to transmission customers and other market participants to fund the operation of FERC and certain other organizations that are involved in management of transmission reliability and regulation. These fees are defined in PJM OATT Schedules 9 and 10, and are approved by the FERC.

PJM Schedule 9-1, Control Area Administration Service

Control Area Administration Service comprises all of the activities of PJM associated with preserving the reliability of the PJM Region and administering point-to-point transmission service and network integration transmission service. This service is billed to each user, including AEP, based on MWhs of

energy delivered.

PJM Schedule 9-2, FTR Administration Service

The FTR Administration Service comprises all of the activities of PJM associated with administering financial transmission rights, including coordination of FTR bilateral trading, administration of FTR auctions, support of PJM's online internet-based eFTR tool, and FTR award analyses. FTR Administration Service is billed to each FTR market participant based on three components:

- the quantity of FTR MWhs of all FTRs held by the market participant times the tariff rate,
- the number of hours in all bids to buy FTR obligations during the annual auction and all monthly auctions, multiplied by the tariff rate, and
- five times the number of hours in all bids to buy FTR options during the annual auction and all monthly auctions, multiplied by the tariff rate.

PJM Schedule 9-3, Market Support Service

Market Support Service comprises all of the activities of PJM associated with supporting the operation of the PJM Interchange Energy Market and related functions, including market modeling and scheduling functions, locational marginal pricing support, market settlements and billing, support of PJM's internet-based customer interactive tool known as inSchedule, and market monitoring. PJM bills each market participant a Market Support charge equal to the sum of the following components:

- MWhs of energy delivered to load in the PJM Region or for export, plus MWhs of energy input into the transmission system, plus MWhs of all accepted increment and decrement bids times the tariff rate.
- The number of bid/offer segments submitted during the period times the tariff rate. A bid/offer segment is each price/quantity pair submitted into the day-ahead energy market.

PJM Schedule 9-4, Regulation and Frequency Response Administration Service

Regulation and Frequency Response Administration Service comprises all of the activities of PJM associated with administering the provision of regulation and frequency response service. Regulation and frequency response service is necessary to provide for the continuous balancing of resources (generation and interchange) with load and for maintaining scheduled frequency at sixty Hertz. PJM administration costs associated with the provision of Regulation and Frequency Response Administration Service are billed to LSEs and generators based on MWhs of regulation service.

PJM Schedule 9-5, Capacity Resource and Obligation Management Service

This service comprises the activities of PJM associated with assuring that customers have arranged for sufficient generating capacity to meet their capacity obligations. This service is billed to LSEs, generators and other market participants based on the MW-days of resource or obligation provided.

PJM Schedule 9-6, Formula rate for costs of advanced second control center

This formula rate recovers the costs of PJM's advanced second control center, as set forth in Schedule 9-6. Monthly charges are assessed to all users of services under PJM OATT Schedules 9-1 through 9-5. The charges are based on the applicable billing determinants set forth in Schedules 9-1 through 9-5.

PJM Schedule 9-FERC

PJM is subject to an annual charge assessed by the FERC to cover the costs of that agency. PJM bills this charge to transmission customers based on their total MWhs of electric energy delivered.

PJM Schedule 9-OPSI

The Organization of PJM States (OPSI) was established during 2005. The purpose of OPSI is to maintain an organization of electric utility regulatory agencies in the 13 states and the District of Columbia within

which PJM operates. OPSI Member Regulatory Agencies' activities include, but are not limited to, coordinating activities such as data collection, issues analyses, and policy formulation related to PJM, its operations, its market monitor, and related FERC matters. The Schedule 9-OPSI charge to each transmission customer is based on the MWhs of energy delivered to load.

PJM Schedule 9-FINCON

PJM anticipates retaining consultants to assist the PJM Finance Committee, and has created Schedule 9-FINCON to collect financial consultant costs.

PJM Schedule 9-MMU

In order to ensure independence and identify potential or actual market manipulation, PJM, per FERC order, receives oversight from a Market Monitoring Unit (MMU). This fee funds this market monitoring service. Schedule 9-MMU collects the MMU's cost from all transmission service customers, generators and other energy market bidders based upon MWh of service provided, bid or taken.

PJM Schedule 10-NERC

The North American Electric Reliability Corporation (NERC) develops and enforces reliability standards for the bulk power system in North America. PJM Schedule 9-FERC recovers NERC Operations costs for the PJM Region. The fee is charged in all PJM zones other than the Duquesne and Dominion Zones and is assessed to LSEs and others based on MWh of energy deliveries.

PJM Schedule 10-RFC

ReliabilityFirst Corporation (RFC) operates under the NERC umbrella; its mission being to preserve and enhance electric service reliability and security for the interconnected electric systems within the ReliabilityFirst geographic area. This area encompasses all of PJM except the Duquesne and Dominion Zones. The fee is assessed based upon MWh of load, including losses.

Kentucky Power Company
 Exhibit AEV 2 - Adjusted Test Year PJM Charges and Credits
 12 Months Ended March 31, 2011
 (Revenues)/Expenses

Line	Acct	Description	Classification	Per Books Test	Stand Alone Test	Pool Termination	Blackstart	RTEP	Total KPco	Kentucky PSC	Kentucky PSC	Adjusted Test		
				Year Total	Year Total - Includes	Adjustment	Service Charge	Adjustment	Adjustment	Jurisdiction	Jurisdiction	Year Jurisdiction		
				A	B	C=B-A	D	E	F=C+D+E	G	H=F*G	I=A*G	J=H+I	
1	4470093	PJM Implicit Congestion-LSE	Energy	\$ 4,858,454	\$ 8,337,572	\$ 3,479,218			\$ 3,479,218	Energy	0.986	\$ 3,430,509	\$ 4,790,435	\$ 8,220,944
2	4470101	PJM FTR Revenue-LSE	Energy	\$ (3,450,500)	\$ (4,350,671)	\$ (900,171)			\$ (900,171)	Energy	0.986	\$ (887,569)	\$ (3,402,193)	\$ (4,289,762)
3	4470116	PJM Meter Corrections-LSE	Energy	\$ (39,504)	\$ (1,644,306)	\$ (1,604,802)			\$ (1,604,802)	Energy	0.986	\$ (1,582,335)	\$ (38,950)	\$ (1,621,285)
4	4470202	PJM OpRes-LSE-Credit	Energy	\$ (2,537,033)	\$ (95,829)	\$ 2,541,205			\$ 2,541,205	Energy	0.986	\$ 2,505,628	\$ (2,600,115)	\$ (94,487)
5	4470203	PJM OpRes-LSE-Charge	Energy	\$ 2,573,734	\$ 2,942,019	\$ 368,285			\$ 368,285	Energy	0.986	\$ 363,129	\$ 2,537,701	\$ 2,900,830
6	5550036	PJM Emer.Energy Purch.	Energy	\$ -	\$ -	\$ -			\$ -	Energy	0.986	\$ -	\$ -	\$ -
7	5550040	PJM Inadvertent Mtr Res-LSE	Energy	\$ 11,861	\$ 20,969	\$ 9,108			\$ 9,108	Energy	0.986	\$ 8,980	\$ 11,865	\$ 20,675
8	5550041	PJM Ancillary Serv.-Sync	Energy	\$ 2,257	\$ 2,666	\$ 409			\$ 409	Energy	0.986	\$ 403	\$ 2,226	\$ 2,629
9	5550074	PJM Reactive-Charge	Demand	\$ 7,366	\$ 2,203,935	\$ 2,196,569			\$ 2,196,569	PDAF	0.985	\$ 2,163,620	\$ 7,256	\$ 2,170,876
10	5550075	PJM Reactive-Credit	Demand	\$ 102,602	\$ (2,182,602)	\$ (2,285,204)			\$ (2,285,204)	PDAF	0.985	\$ (2,250,926)	\$ 101,063	\$ (2,149,863)
11	5550078	PJM Black Start-Charge	Demand	\$ 1,280,598	\$ 1,767,316	\$ 486,718	\$ 3,222,825		\$ 3,708,543	PDAF	0.985	\$ 3,653,900	\$ 1,261,369	\$ 4,915,269
12	5550077	PJM Black Start-Credit	Demand	\$ (27,714)	\$ (8)	\$ 27,706			\$ 27,706	PDAF	0.985	\$ 27,291	\$ (27,299)	\$ (8)
13	5550078	PJM Regulation-Charge	Energy	\$ 1,467,821	\$ 1,698,156	\$ 530,337			\$ 530,337	Energy	0.986	\$ 522,912	\$ 1,447,272	\$ 1,970,184
14	5550079	PJM Regulation-Credit	Energy	\$ (731,919)	\$ (959,803)	\$ (227,884)			\$ (227,884)	Energy	0.986	\$ (224,694)	\$ (721,672)	\$ (946,366)
15	5550083	PJM Spinning Reserve-Charge	Energy	\$ 16,332	\$ 42,488	\$ 26,156			\$ 26,156	Energy	0.986	\$ 25,790	\$ 16,103	\$ 41,893
16	5550084	PJM Spinning Reserve-Credit	Energy	\$ (2,502)	\$ (61,616)	\$ (59,114)			\$ (59,114)	Energy	0.986	\$ (58,286)	\$ (2,467)	\$ (60,753)
17	5550090	PJM 30m Suppl Reserv Charge LSE	Energy	\$ 247,099	\$ 261,144	\$ 14,045			\$ 14,045	Energy	0.985	\$ 13,849	\$ 243,639	\$ 257,488
18	5550093	Peak Hour Avail charge - LSE	Demand	\$ -	\$ -	\$ -			\$ -	PDAF	0.985	\$ -	\$ -	\$ -
19	5614001	PJM Admin-SSC&DS-Internal	Energy	\$ 934,899	\$ 920,355	\$ (14,544)			\$ (14,544)	Energy	0.986	\$ (14,340)	\$ 921,810	\$ 907,470
20	5614007	PJM Admin Defaults LSE	Energy	\$ 24,603	\$ -	\$ -			\$ -	Energy	0.986	\$ -	\$ 24,259	\$ 24,259
21	5618001	PJM Admin-RP&SDS- Internal	Energy	\$ 212,763	\$ 211,050	\$ (1,713)			\$ (1,713)	Energy	0.986	\$ (1,689)	\$ 208,784	\$ 208,096
22	5757001	PJM Admin-MAM&SC- Internal	Energy	\$ 980,924	\$ 988,613	\$ 7,689			\$ 7,689	Energy	0.986	\$ 7,581	\$ 967,191	\$ 974,772
23	4561035	Network Integrated Transmission Service	Demand	\$ 36,116,142	\$ 36,116,142	\$ -			\$ -	Direct to KY Retail	1.00	\$ -	\$ 36,116,142	\$ 36,116,142
24	5650016	Network Integrated Transmission Service	Demand	\$ 1,250,261	\$ 1,250,261	\$ -			\$ -	Direct to KY Retail	1.00	\$ -	\$ 1,250,261	\$ 1,250,261
25	4561005	Firm and Non-Firm Point to Point Transmission	Demand	\$ (681,555)	\$ (681,555)	\$ -			\$ -	Direct to KY Retail	1.00	\$ -	\$ (681,555)	\$ (681,555)
26	4561036	Schedule 1a Charges	Energy	\$ 470,070	\$ 470,070	\$ -			\$ -	Direct to KY Retail	1.00	\$ -	\$ 470,070	\$ 470,070
27	5650015	Schedule 1a Charges	Energy	\$ 863	\$ 863	\$ -			\$ -	Direct to KY Retail	1.00	\$ -	\$ 863	\$ 863
28	5650012	Transmission Enhancement Charges	Demand	\$ 3,245,883	\$ 3,245,883	\$ -		\$ 2,180,237	\$ 2,180,237	Direct to KY Retail	1.00	\$ 2,180,237	\$ 3,245,883	\$ 5,426,120
29	4561060	Transmission Enhancement Charges	Demand	\$ 238,880	\$ 238,880	\$ -		\$ (7,020)	\$ (7,020)	Direct to KY Retail	1.00	\$ (7,020)	\$ 238,880	\$ 231,860
30	5650019	Transmission Enhancement Charges - Affil	Demand	\$ 49,348	\$ 49,348	\$ -		\$ 16,063	\$ 16,063	Direct to KY Retail	1.00	\$ 16,063	\$ 49,348	\$ 65,411
31	4561002	RTO Formation Costs	Demand	\$ 135,263	\$ (10,846)	\$ -		\$ -	\$ -	Direct to KY Retail	1.00	\$ -	\$ 135,263	\$ 135,263
32	4561003	Expansion Cost Recovery Charge	Demand	\$ 83,333	\$ (85,722)	\$ -		\$ -	\$ -	Direct to KY Retail	1.00	\$ -	\$ 83,333	\$ 83,333
Totals				\$ 46,740,629	\$ 50,994,874	\$ 4,594,012	\$ 3,222,825	\$ 2,189,280	\$ 10,066,118		\$ 9,893,033	\$ 46,657,616	\$ 56,550,649	

**Kentucky Power Company
Exhibit AEV 3
PJM Tracker Rate Design**

	<u>Demand</u>	<u>Energy</u>	<u>Total</u>
Jurisdictional (Over) / Under	\$0	\$0	\$0

<u>Class</u> (1)	<u>Historic Period</u> <u>Billing</u> <u>Energy</u> (2)	<u>Test Year</u> <u>CP / kWh</u> <u>Ratio</u> (3)	<u>CP</u> <u>Demand</u> <u>Allocation</u> <u>Factor</u> (4) = (2) x (3)	<u>Allocated</u> <u>Demand</u> <u>Related</u> <u>Costs</u> (5) on (4)	<u>Allocated</u> <u>Energy</u> <u>Related</u> <u>Costs</u> (6) on (2)	<u>Total</u> <u>Cost</u> (7) = (5) + (6)	<u>\$ / kWh</u> <u>Rate</u> (8) = (7) / (2)	<u>Revenue</u> <u>Verification</u> (9)
RES	2,515,737,354	0.0213531%	537,189	\$0	\$0	\$0	\$0.000000	\$0
SGS	149,171,019	0.0144552%	21,563	0	0	0	\$0.000000	0
MGS	575,945,659	0.0168782%	97,209	0	0	0	\$0.000000	0
LGS	775,528,153	0.0158073%	122,590	0	0	0	\$0.000000	0
QP	717,390,027	0.0143675%	103,071	0	0	0	\$0.000000	0
CIP	2,254,126,636	0.0120216%	270,981	0	0	0	\$0.000000	0
MW	4,180,635	0.0116968%	489	0	0	0	\$0.000000	0
OL	48,666,992	0.0026260%	1,278	0	0	0	\$0.000000	0
SL	9,078,136	0.0023793%	216	0	0	0	\$0.000000	0
Total	7,049,824,613		1,154,586	\$0	\$0	\$0		\$0

KPCo KY Retail PSC Jurisdiction
Class Billing Determinants

<u>Class</u> (1)	<u>kWh Energy</u>	<u>kW 12 CP</u>
RES	2,515,737,354	537,189
SGS	149,171,019	21,563
MGS	575,945,659	97,209
LGS	775,528,153	122,590
QP	717,390,027	103,071
CIP	2,254,126,636	270,981
MW	4,180,635	489
OL	48,666,992	1,278
SL	9,078,136	216
Total	7,049,824,613	1,154,586

Kentucky Power Company
 Exhibit AEV 4 - Mitchell Plant Cost of Service Summary
 12 Months Ended March 31, 2013

		Mitchell Units 1&2	KPCo Share	Allocation Method	Kentucky Retail
<u>Rate Base</u>					
Electric Plant In Service - Gross	\$	1,791,203,999	\$ 895,602,000	PDAF	\$ 882,167,970
Accum. Prov. For Depreciation	\$	574,964,789	\$ 287,482,395	PDAF	\$ 283,170,159
Electric Plant In Service - Net	\$	1,216,239,210	\$ 608,119,605	PDAF	\$ 598,997,811
Materials & Supplies	\$	86,072,742	\$ 43,036,371	Various	\$ 42,424,390
Cash Working Capital	\$	9,730,416	\$ 4,865,208	Various	\$ 4,794,534
Construction Work In Progress	\$	80,424,311	\$ 40,212,156	PDAF	\$ 39,608,973
Less:					
Accumulated Deferred Income Taxes	\$	298,883,124	\$ 149,441,562	GP-TOT	\$ 147,947,146
<u>Total Rate Base</u>	\$	1,093,583,555	\$ 546,791,778		\$ 537,878,562
<u>Operating Expense</u>					
Total Operation and Matinenance Expense	\$	77,843,320	\$ 38,921,666	Various	\$ 38,356,274
Total Taxes other than Income Taxes	\$	10,166,305	\$ 5,083,155	Various	\$ 5,028,422
Depreciation Expense	\$	66,673,065	\$ 33,469,819	PDAF	\$ 32,967,772
<u>Total Operating Expense</u>	\$	154,682,690	\$ 77,474,640		\$ 76,352,468

Development of Rate Base

FERC Account	Description	Mitchell 1 & 2	KPCo
101-106, 114	Utility Plant	\$ 1,791,203,999	\$ 895,602,000
107	Construction Work in Progress	\$ 80,424,311	\$ 40,212,156
108, 111, 115	Accum Prov for Depreciation & Depletion - Uti	\$ (574,964,789)	\$ (287,482,395)
121	Nonutility Property	\$ -	\$ -
124	Other Investments	\$ 3,202,722	\$ 1,601,361
151	Fuel Stock	\$ 58,312,511	\$ 29,156,256
152	Fuel Stock Expenses Undistributed	\$ 1,391,779	\$ 695,890
154	Plant Materials and Operating Supplies	\$ 18,943,330	\$ 9,471,665
158.1, 158.2	Allowances	\$ 7,425,122	\$ 3,712,561
186	Miscellaneous Deferred Debits (Property Tax)	\$ 7,285,000	\$ 3,642,500
190	Accumulated Deferred Income Tax	\$ 7,756,001	\$ 3,878,001
228.2	Accumulated Provision for Injuries and Damag	\$ (47,330)	\$ -
230	Asset Retirement Obligations	\$ (10,452,039)	\$ (5,226,020)
236	Taxes Accrued (Property Taxes)	\$ (5,900,000)	\$ (2,950,000)
242	Miscellaneous Current and Accrued Liabilities	\$ (667,814)	\$ -
242	Miscellaneous Current and Accrued Liabilities	\$ (904,390)	\$ (452,195)
253	Miscellaneous Non-Current Liabilities (NSR)	\$ (852,175)	\$ (426,088)
282	Accum. Deferred Income Taxes	\$ (295,792,366)	\$ (147,896,183)
283	Accum. Deferred Income Taxes	\$ (10,846,759)	\$ (5,423,380)

Development of Operational Expenses

FERC Account	Description	Mitchell 1 & 2	KPCo		Kentucky Retail
Fuel Expense					
5010000	Fuel	\$ 595,724	\$ 297,862	Energy	\$ 293,692
5010003	Fuel - Procure Unload & Handle	\$ 5,979,787	\$ 2,989,894	Energy	\$ 2,948,035
5010012	Ash Sales Proceeds	\$ (214,232)	\$ (107,116)	Energy	\$ (105,616)
5010013	Fuel Survey Activity	\$ (2,551,152)	\$ (1,275,576)	Energy	\$ (1,257,718)
5010027	Gypsum handling/disposal costs	\$ 1,975,182	\$ 987,591	Energy	\$ 973,765
5010028	Gypsum Sales Proceeds	\$ (642,723)	\$ (321,362)	Energy	\$ (316,862)
5010029	Gypsum handling/displ-Affiliat	\$ 271,528	\$ 135,764	Energy	\$ 133,863
5010033	Coal Procurement Sales Net-NA	\$ 19,257	\$ 9,629	Energy	\$ 9,494
	Total	\$ 5,433,371	\$ 2,716,686		\$ 2,678,652
Operating Expense					
5000000	Oper Supervision & Engineering	\$ 3,218,781	\$ 1,609,391	PDAF	\$ 1,585,250
5000001	Oper Super & Eng-RATA-Affil	\$ 62,663	\$ 31,332	PDAF	\$ 30,862
5020000	Steam Expenses - Demand (labor)	\$ 724,601	\$ 362,301	PDAF	\$ 356,866
5020000	Steam Expenses - Energy (materials)	\$ 1,395,791	\$ 697,896	Energy	\$ 688,125
5020025	Steam Exp Environmental	\$ (23)	\$ (12)	PDAF	\$ (11)
5050000	Electric Expenses -Demand (labor)	\$ 4,633	\$ 2,317	PDAF	\$ 2,282
5050000	Electric Expenses - Energy (materials)	\$ (3,940)	\$ (1,970)	Energy	\$ (1,942)
5060000	Misc Steam Power Expenses	\$ 5,173,150	\$ 2,586,575	PDAF	\$ 2,547,776
5060002	Misc Steam Power Exp-Assoc	\$ 118,689	\$ 59,345	PDAF	\$ 58,454
5060004	NSR Settlement Expense	\$ (38,533)	\$ (19,267)	PDAF	\$ (18,978)
5060025	Misc Stm Pwr Exp Environmental	\$ 7,556	\$ 3,778	PDAF	\$ 3,721
5560000	Sys Control & Load Dispatching	\$ 350,245	\$ 175,123	PDAF	\$ 172,496
5570000	Other Expenses	\$ 1,248,161	\$ 624,081	PDAF	\$ 614,719
5090000	Allow Consum Title IV SO2	\$ 407,346	\$ 203,673	Energy	\$ 200,822
5090001	Allowance Consumption - NOx	\$ 10,544	\$ 5,272	Energy	\$ 5,198
5090002	Allowance Expenses	\$ 33	\$ 17	Energy	\$ 16
5090005	An. NOx Cons. Exp	\$ 7,806	\$ 3,903	Energy	\$ 3,848
5020001	Lime Expense	\$ 5,191,785	\$ 2,595,893	Energy	\$ 2,559,550
5020002	Urea Expense	\$ 1,318,142	\$ 659,071	Energy	\$ 649,844
5020003	Trona Expense	\$ 6,419,089	\$ 3,209,545	Energy	\$ 3,164,611
5020007	Lime Hydrate Expense	\$ 26,793	\$ 13,397	Energy	\$ 13,209
	Total	\$ 25,643,312	\$ 12,821,661		\$ 12,636,718
Maintenance Expense					
5100000	Maint Supv & Engineering	\$ 6,644,968	\$ 3,322,484	PDAF	\$ 3,272,647
5110000	Maintenance of Structures	\$ 1,534,087	\$ 767,044	PDAF	\$ 755,538
5120000	Maintenance of Boiler Plant - Demand	\$ 6,689,475	\$ 3,344,737	Energy	\$ 3,294,566
5120000	Maintenance of Boiler Plant - Energy	\$ 12,985,451	\$ 6,492,726	Energy	\$ 6,401,827
5130000	Maintenance of Electric Plant	\$ 5,050,995	\$ 2,525,498	PDAF	\$ 2,487,615
5140000	Maintenance of Misc Steam Plt	\$ 905,192	\$ 452,596	PDAF	\$ 445,807
	total	\$ 33,810,168	\$ 16,905,085		\$ 16,658,000

Total of A&G Accounts 920-935							
Reallocation of Mitchell A&G to Maintenance Accts							
500	\$	222,788	\$	111,394	PDAF	\$	109,723
501	\$	983,154	\$	491,577	Energy	\$	484,695
502	\$	636,584	\$	318,292	Energy (for A&G)	\$	313,836
505	\$	4,070	\$	2,035	Energy (for A&G)	\$	2,007
506	\$	1,900,928	\$	950,464	PDAF	\$	936,207
510	\$	5,096,274	\$	2,548,137	PDAF	\$	2,509,915
511	\$	220,920	\$	110,460	PDAF	\$	108,803
512 Energy	\$	2,062,107	\$	1,031,054	Energy	\$	1,016,619
512 Demand	\$	1,062,298	\$	531,149	PDAF	\$	523,182
513	\$	629,412	\$	314,706	PDAF	\$	309,985
514	\$	137,935	\$	68,967	PDAF	\$	67,933
total	\$	12,956,469	\$	6,478,234		\$	6,382,904

Taxes Other Than Income Taxes								
408100612	State Gross Receipts Tax	\$	94,314	\$	47,157	SPECIFIC	\$	47,157
408100613	State Gross Receipts Tax	\$	48,130	\$	24,065	SPECIFIC	\$	24,065
4081002	FICA	\$	1,543,487	\$	771,744	OML	\$	765,570
4081003	Federal Unemployment Tax	\$	17,149	\$	8,575	OML	\$	8,506
4081007	State Unemployment Tax	\$	37,520	\$	18,760	OML	\$	18,610
4081033	Fringe Benefit Loading - FICA	\$	(289,234)	\$	(144,617)	OML	\$	(143,460)
4081034	Fringe Benefit Loading - FUT	\$	(1,985)	\$	(993)	OML	\$	(985)
4081035	Fringe Benefit Loading - SUT	\$	(4,702)	\$	(2,351)	OML	\$	(2,332)
4081038	Payroll Tax	\$	198,496	\$	99,248	OML	\$	98,454
4081020	State Business & Occ Taxes	\$	3,056,566	\$	1,528,283	Energy	\$	1,506,887
4081005	Real Personal Property Taxes	\$	5,465,000	\$	2,732,500	GP-TOT	\$	2,705,175
408101411	Federal Excise Taxes	\$	481	\$	241	OML	\$	239
408101711	St Lic-Rgstrtion Tax-Fees	\$	95	\$	48	OML	\$	47
408101712	St Lic-Rgstrtion Tax-Fees	\$	5	\$	3	OML	\$	2
408101713	St Lic-Rgstrtion Tax-Fees	\$	902	\$	451	OML	\$	447
408101912	State Sales and Use Taxes	\$	16	\$	8	OML	\$	8
408102812	State Sales/Use Tax-Cap Leases	\$	65	\$	33	OML	\$	32
total		\$	10,166,305	\$	5,083,155		\$	5,028,422



COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

**THE APPLICATION FOR A GENERAL)
ADJUSTMENT OF ELECTRIC RATES)
OF KENTUCKY POWER COMPANY)**

Case No. 2013-00197

DIRECT TESTIMONY OF

RANIE K. WOHNHAS

ON BEHALF OF KENTUCKY POWER COMPANY

VERIFICATION

The undersigned, Ranie K. Wohnhas being duly sworn, deposes and says he is the Managing Director Regulatory and Finance for Kentucky Power Company, that he has personal knowledge of the matters set forth in the forgoing testimony and the information contained therein is true and correct to the best of his information, knowledge, and belief.

Ranie K. Wohnhas

Ranie K. Wohnhas

COMMONWEALTH OF KENTUCKY)

) Case No. 2013-00197

COUNTY OF FRANKLIN)

Subscribed and sworn to before me, a Notary Public in and before said County and State, by Ranie K. Wohnhas, this the 18th day of June 2013.

Judy K. Rogquist 481393

Notary Public

My Commission Expires: January 23, 2017

**DIRECT TESTIMONY OF
RANIE K. WOHNHAS, ON BEHALF OF
KENTUCKY POWER COMPANY
BEFORE THE PUBLIC SERVICE COMMISSION OF KENTUCKY**

CASE NO. 2013-00197

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**DIRECT TESTIMONY OF
RANIE K. WOHNHAS, ON BEHALF OF
KENTUCKY POWER COMPANY
BEFORE THE PUBLIC SERVICE COMMISSION OF KENTUCKY**

I. INTRODUCTION

1 **Q: PLEASE STATE YOUR NAME, POSITION AND BUSINESS ADDRESS.**

2 A: My name is Ranie K. Wohnhas. My position is Director, Business Operations
3 Support, Kentucky Power Company (“Kentucky Power” or “Company”). My
4 business address is 101 A Enterprise Drive, Frankfort, Kentucky 40601.

II. BACKGROUND

5 **Q: PLEASE SUMMARIZE YOUR EDUCATIONAL BACKGROUND AND**
6 **BUSINESS EXPERIENCE.**

7 A: I received a Bachelor of Science degree with a major in accounting from Franklin
8 University, Columbus, Ohio in December 1981. I began work with Columbus
9 Southern Power in 1978 working in various customer services and accounting
10 positions. In 1983, I transferred to Kentucky Power Company working in
11 accounting, rates and customer services. I became the Billing and Collections
12 Manager in 1995 overseeing all billing and collection activity for the Company.
13 In 1998, I transferred to Appalachian Power Company working in rates. In 2001,
14 I transferred to the AEP Service Corporation working as a Senior Rate
15 Consultant. In July 2004, I assumed the position of Manager, Business
16 Operations Support and was promoted to Director in April 2006. I was promoted

1 to my current position as Managing Director, Regulatory and Finance effective
2 September 1, 2010.

3 **Q: WHAT ARE YOUR RESPONSIBILITIES AS MANAGING DIRECTOR,**
4 **REGULATORY AND FINANCE?**

5 A: I am primarily responsible for managing the regulatory and financial strategy for
6 Kentucky Power. This includes planning and executing rate filings for both
7 federal and state regulatory agencies and certificate of public convenience and
8 necessity (“CPCN”) filings before this Commission. I am also responsible for
9 managing the Company’s financial operating plans including various capital and
10 O&M operational budgets that interface with all other AEP organizations
11 affecting the Company’s performance. As part of the financial strategy, I work
12 with various AEPSC departments to ensure that adequate resources such as debt,
13 equity and cash are available to build, operate, and maintain Kentucky Power’s
14 electric system assets providing service to our retail and wholesale customers. In
15 my role as Managing Director, Regulatory and Finance, I report directly to
16 Gregory G. Pauley, President and Chief Operating Officer of Kentucky Power.

17 **Q: HAVE YOU PREVIOUSLY TESTIFIED BEFORE THIS COMMISSION?**

18 A: Yes. I have testified before this Commission in various fuel review proceedings
19 and filed testimony in the Company’s two most recent base rate case filings, Case
20 No. 2005-00341 and Case No. 2009-00459. Other cases in which I have testified
21 include an environmental compliance plan, Case No. 2011-00401; a real-time
22 pricing proceeding, Case No. 2012-00226; and the current application before the

1 Commission to transfer an undivided 50% interest in the Mitchell Generating
2 Station to Kentucky Power, Case No. 2012-00578.

III. PURPOSE OF TESTIMONY

3 **Q: WHAT IS THE PURPOSE OF YOUR TESTIMONY IN THIS**
4 **PROCEEDING?**

5 A: The purpose of my testimony is to support: (1) the revenue requirement being
6 proposed by the Company; (2) adjustments to the Company’s capitalization; (3)
7 certain known and measurable adjustments to test year revenues and operating
8 expenses; (4) certain tariff revisions; (5) the recovery of certain emission
9 allowances; (6) the deferral, amortization and recovery of the Big Sandy Plant
10 Production Operation and Maintenance (“O&M”) and depreciation expenses; and
11 (7) the recovery and amortization periods for certain other regulatory assets and
12 deferred costs.

IV. FILING REQUIREMENTS

13 **Q: PLEASE DESCRIBE SECTION IV OF THE COMPANY’S FILING.**

14 A: Section IV of the Company’s filing is the financial exhibit required by the
15 Commission regulation in 807 KAR 5:001, Section 12. Balance sheet data is
16 shown as of March 31, 2013, and income statement data is for the twelve months
17 ended March 31, 2013. This complies with the ninety-day rule stipulated by the
18 Commission in 807 KAR 5:001, Section 12.

1 **Q: HAS THE COMPANY COMPLIED WITH THE COMMISSION'S**
2 **REGULATIONS REQUIRING CERTAIN ADDITIONAL DATA TO BE**
3 **FILED?**

4 A: Yes. This information has been incorporated into Sections II and III of the
5 Company's filing.

6 **Q: HAVE YOU PREPARED ANY SCHEDULES OR WORKPAPERS IN**
7 **CONNECTION WITH YOUR TESTIMONY?**

8 A: Yes. The summaries and details of the Capitalization and Rate Base amounts, and
9 the adjustments to the "per books" results of operations that I am sponsoring are
10 set forth in various schedules of Section V of the Company's filing. In particular,
11 I am sponsoring the following Schedules:

- 12 • Schedule 1: Fully Adjusted Base Case Summary
- 13 • Schedule 2: Revenue Requirement
- 14 • Schedule 3: Capitalization
- 15 • Schedule 4: Adjustment Summary

16 I am also sponsoring a number of specific adjustments contained within Schedule
17 4 and identify the specific workpaper sheet number where appropriate.

18 **Q: WERE THESE SCHEDULES AND EXHIBITS PREPARED BY YOU OR**
19 **UNDER YOUR DIRECTION?**

20 A: Yes.

1 **Q: WHAT INFORMATION ON THE SUMMARIES AND ADJUSTMENTS**
2 **ARE YOU SPONSORING?**

3 A: I am responsible for the total Company amounts shown or used to derive the
4 Kentucky Power retail jurisdictional amounts. Witness Munsey furnished the
5 Kentucky Power retail jurisdictional amounts and the allocation factors required
6 to calculate such amounts. Witness Munsey is also responsible for the allocation
7 methodology.

V. PROPOSED INCREASE IN ANNUAL REVENUES

8 **Q: PLEASE DESCRIBE THE REVENUE REQUIREMENT BEING**
9 **PROPOSED BY THE COMPANY.**

10 A: The Company is proposing an annual revenue requirement of \$610,582,495. This
11 represents an increase of \$113,998,826 over the Test Year ended March 31, 2013
12 adjusted revenues of \$487,401,782 or an increase of approximately 23.39%. This
13 annual revenue requirement presumes the Company's proposed treatment of
14 transmission revenues and expenses in base rates ("Transmission Adjustment") is
15 approved by the Commission. Without the Transmission Adjustment, the
16 increase in annual revenue requirement will be \$117,789,745 – an increase of
17 approximately 24.17%. The derivation of the Transmission Adjustment is
18 described in the testimony of Company Witness Vaughan.

19 In addition, the Company is proposing a change to Tariff S.S.C. to reflect the
20 expected increase in system sales during the expected seventeen month period
21 following the proposed transfer of a 50% interest in the Mitchell Generating
22 Station and prior to the retirement of Big Sandy Unit 2 ("Overlap Period"). This

1 change to the tariff is designed to provide rate mitigation during the Overlap
2 Period. The effect of this rate mitigation is not included in the 23.39% proposed
3 increase in the Company's revenue requirement. The details of this proposed
4 change to Tariff S.S.C. are discussed later in my testimony.

5 **Q. CAN YOU SUMMARIZE THE DEVELOPMENT OF THE PROPOSED**
6 **ANNUAL REVENUE REQUIREMENT?**

7 A. The development of the proposed annual revenue requirements is shown on
8 Schedule 1 of Section V of the Company's filing. Schedule 1 summarizes the
9 components of Net Electric Operating Income for the twelve months ended March
10 31, 2013, as adjusted, under present rates in Column 3; and the effects of the
11 proposed rate increase on those components in Column 4. Also shown are the
12 components of Net Electric Operating Income after giving effect to the proposed
13 rate increase in Column 5. Finally, the total amount of rate base and
14 capitalization is also shown as well as the calculated overall rates of return.

15 Schedule 2 shows how Kentucky Power derived the proposed increase in annual
16 revenue requirement, without the Transmission Adjustment, of \$117,789,745.
17 Schedule 3 shows the Company's development of the adjusted capitalization
18 amount used to develop the required increase in annual revenue requirement and
19 includes the addition of an undivided 50% interest in the Mitchell Generating
20 Station. Schedule 4 identifies the known and measurable adjustments to test year
21 revenue, expenses and rate base. Details of each adjustment are shown in the
22 workpapers to Schedule 4. Schedule 5 provides a summary of the Kentucky retail

1 jurisdictional amounts of Operating Revenues, Operating Expense, Net Electric
 2 Operating Income, and Rate Base.

3 **Q. IS KENTUCKY POWER PROPOSING TO EQUALIZE RATES OF**
 4 **RETURN ACROSS ALL CUSTOMER CLASSES?**

5 A. No. Kentucky Power is not proposing to equalize its rates of return over all
 6 customer classes because the impact of doing so would be significant on certain
 7 customer classes, especially residential. As shown in the testimony of Company
 8 Witness Stegall, the residential customer class has the lowest rate of return. To
 9 equalize the rates of return across classes would result in a far greater increase in
 10 rates for the Company’s residential customers. While it is the Company’s
 11 intention to gradually, over time, move towards equalized rates of return across
 12 customer classes, the Company is not proposing to make any progress towards
 13 that goal for the purposes of this proceeding to mitigate rate impacts on the
 14 residential customer class.

VI. CAPITALIZATION ADJUSTMENTS

15 **Q: WOULD YOU PLEASE DESCRIBE EACH OF THE CAPITALIZATION**
 16 **ADJUSTMENTS THAT YOU ARE SPONSORING?**

17 A: Yes. The details of the Capitalization adjustments are set forth on Section V,
 18 Schedule 3, as follows:

	<u>Adjustment</u>	<u>Schedule 3</u>
19	1. Mitchell Transfer	Column 4
20	2. Big Sandy Coal Stock	Column 6
21	3. Mitchell Coal Stock	Column 7

1	4. FRECO A/C 124	Column 8
2	5. Carrs Site	Column 9
3	6. Non-Utility Property	Column 10
4	7. KY Jurisdiction	Column 12

Mitchell Transfer Adjustment
(Schedule 3, Column 4)

5 The Company added \$290,000,000 in long term debt and \$248,000,000 in
6 common equity to its book balances as a result of the transfer of an undivided
7 50% interest in the Mitchell Generating Station. The specifics of these
8 adjustments are described in more detail in the testimony and exhibits of
9 Company Witness Reitter.

Big Sandy Coal Stock Adjustment
(Schedule 3, Column 6)

10 Kentucky Power's coal inventory target at the Big Sandy Plant is a 30 day supply
11 at an average burn rate of 10,182 tons per day or 305,460 tons. On March 31,
12 2013 the Company had 571,240 tons of coal on hand. The average cost of coal
13 inventory at Big Sandy on March 31, 2013 was \$79.74 per ton. Thus, the value of
14 the coal in inventory on March 31, 2013 was \$45,551,062. The difference
15 between the March 31, 2013 coal inventory and the target coal inventory is
16 265,570 tons with a value of \$21,193,476. After applying the appropriate
17 allocation factor, the adjustment was a decrease of \$20,875,574. Because the coal
18 inventory is usually financed with short-term debt, the Company made this
19 adjustment to its March 31, 2013 short-term debt.

Mitchell Coal Stock Adjustment
(Schedule 3, Column 7)

1 The coal inventory target at the Mitchell Plant is a 45 day supply at an average
2 burn rate of 15,214 tons per day or 684,630 tons. On March 31, 2013 the Mitchell
3 Plant had 716,138 tons of coal on hand. The average cost of coal in inventory at
4 Mitchell on March 31, 2013 was \$74.19 per ton. Thus, the value of the coal in
5 inventory on March 31, 2013 was \$53,130,280. The difference between the
6 March 31, 2013 coal inventory and the target coal inventory is 31,508 tons with a
7 value of \$2,337,580. After accounting for the Company's 50% share and
8 applying the appropriate allocation factor, the adjustment was a decrease of
9 \$1,151,258. Because the coal inventory is usually financed with short-term debt,
10 the Company made this adjustment to its March 31, 2013 short-term debt.

Franklin Realty Company Account No. 124 Property
(Schedule 3, Column 8)

11 The Franklin Realty Company (FRECO) investment, recorded in Account No.
12 124, was removed ratably from the Company's long term debt, short term debt
13 and common equity capitalization. The Company used the accounts receivable
14 financing plus the short term debt balances on March 31, 2013 and divided it by
15 the total capitalization on March 31, 2013 and that result, approximately 5.11%,
16 was spread to short term debt.

Carrs Site Adjustment
(Schedule 3, Column 9)

17 The Carrs Site investment was removed from the Company's capitalization
18 ratably among the long term debt, short term debt and common equity. The
19 Company used the accounts receivable financing plus the short term debt balance

1 on March 31, 2013 and divided it by the total capitalization on March 31, 2013
 2 and that result, approximately 5.11%, was spread to short term debt.

Non-Utility Property
(Schedule 3, Column 10)

3 The Non-Utility investment was removed from the Company’s capitalization
 4 ratably among the long term debt, short term debt and common equity. The
 5 Company used the accounts receivable financing plus the short term debt balance
 6 on March 31, 2013 and divided it by the total capitalization on March 31, 2013
 7 and that result, approximately 5.11%, was spread to short term debt.

VII. REVENUE AND OPERATING EXPENSE ADJUSTMENTS

8 **Q: WOULD YOU PLEASE IDENTIFY AND DISCUSS EACH OF THE**
 9 **REVENUE AND OPERATING EXPENSE ADJUSTMENTS THAT YOU**
 10 **ARE SPONSORING?**

11 **A:** Yes. The details of the revenue and operating expense adjustments are set forth on
 12 various pages of Section V, Workpaper S-4. Specifically, I am sponsoring the
 13 following adjustments:

<u>Adjustment</u>	<u>Workpaper S-4 Page No.</u>
14 1. AEP Pool Capacity Cost	4
15 2. Temporary Interest Expense	6
16 3. Normalization Major Storms	10
17 4. Amortization Storm Cost Deferral	11
18 5. Amortization of Rate Case Expense	12
19 6. Amortization of Intangible Expense	14
20 7. System Sales Tracker Revenues	17

1	8. Net Line of Credit Fee	19
2	9. Reliability	20
3	10. Interest Synchronization	21
4	11. Amortization of CSAPR SO ₂ Allowance Expenses	29
5	12. AFUDC Offset	37
6	13. Annualization of Employee Related Expenses	38-43
7	14. Annualization of Employee Related Expenses – Mitchell Plant	50-55
8	15. Mitchell AFUDC Offset Adjustment	58

9 Additional information regarding each of these adjustments is provided below.

AEP Pool Capacity Charge Adjustment
(Section V, Workpaper S-4, Page 4)

10 **Q. WHAT IS THE CAPACITY CHARGE ADJUSTMENT?**

11 A. Kentucky Power has historically been a deficit member of the FERC-approved
 12 Interconnection Agreement and, therefore, paid a capacity deficit payment to the
 13 surplus members every month. With the termination of the Pool Agreement,
 14 effective January 1, 2014, Kentucky Power will no longer be required to make
 15 these capacity payments. The total effect of this change will be to decrease
 16 Kentucky Power’s capacity cost by approximately \$21,304,099.

Temporary Interest Expense Adjustment
(Section V, Workpaper S-4, Page 6)

17 **Q. EXPLAIN THE TEMPORARY INTEREST EXPENSE ADJUSTMENT.**

18 A. The temporary interest expense adjustment reflects the net position between
 19 Account No, 4190005 Interest Income and Account No, 4300003 Interest
 20 Expense actual amount for the twelve months ended March 31, 2013. The net
 21 amount for the twelve months ended March 31, 2013 was an interest income of

1 \$123,777. Because this income is recorded below the line for accounting
2 purposes, an adjustment in a like amount is required to reflect this cost in the
3 Company's test year cost of service.

Normalization of Major Storms Adjustment
(Section V, Workpaper S-4, Page 10)

4 **Q. HOW WAS THE MAJOR STORM NORMALIZATION ADJUSTMENT**
5 **CALCULATED?**

6 A. The Company adjusted its test year storm damage expense, less in house time
7 labor, by using a three year average storm damage expense, less in house time
8 labor, adjusted by the Handy-Whitman Contract Labor Index. The deferral costs
9 granted in Case No. 2012-00445 were also removed before the 3-year average
10 was calculated. Using the three year average and deducting the test year level of
11 storm damage expense, less deferral, results in an increase to expenses of
12 \$459,166.

Amortization of Major Storm Deferral Adjustment
(Section V, Workpaper S-4, Page 11)

13 **Q. HOW WAS THE AMORTIZATION OF MAJOR STORM DEFERRAL**
14 **ADJUSTMENT CALCULATED?**

15 A. The Company's deferral amount granted in Case No. 2009-00459 of \$24,492,206
16 was added to the new deferral amount as authorized in Case No. 2012-00445 of
17 \$12,146,000, from which the amount of deferral to be collected through
18 December 31, 2013, in accordance with Case No. 2009-00459, of \$16,444,554
19 was subtracted to yield the amount to be amortized over five years. Using the five
20 year average and deducting the test year level of storm damage amortization
21 expense, results in a decrease of \$649,818.

Amortization of Rate Case Expense Adjustment
(Section V, Workpaper S-4, Page 12)

1 **Q. HOW WAS THE RATE CASE EXPENSE DEDUCTION CALCULATED?**

2 A. The Company's estimated cost for this rate proceeding is \$650,000. Consistent
3 with the Commission's past treatment of such expenses, the Company is
4 proposing to recover this cost over a three-year period. Since there was no rate
5 case costs recorded in the test year, an adjustment of \$216,667 ($\$650,000/3$) to the
6 Company's test year expenses is needed. Expenses included in this amount are
7 costs that would not have been incurred except for the filing of this rate case, such
8 as Outside Legal, Cost of Equity Witness, Demolition Study, Legal Publication
9 Notice and any Employee Out-of-pocket Expenses and Contract Labor Costs
10 incurred exclusively associated with this rate case filing.

Amortization of Intangible Expense Adjustment
(Session V, Workpaper S-4, Page 14)

11 **Q. WHY IS INTANGIBLE EXPENSE ANNUALIZED AND AMORTIZED?**

12 A. The Company annualized the March 31, 2013 monthly intangible expense and
13 compared the result with the level of intangible expense included in the test year.
14 The effect of this adjustment is to increase Kentucky Power's depreciation
15 expense and decrease the deferred taxes, as explained by Witness Bartsch by
16 \$372,195 and by \$130,268, respectively.

System Sales Tracker Revenue Adjustment
(Section V, Workpaper S-4, Page 17)

17 **Q. WHAT IS THE SYSTEM SALES TRACKER REVENUE ADJUSTMENT?**

18 A. The system sales tracker revenue adjustment accounts for the aggregate of credits
19 and charges to the customers for off system sales in relationship to the total

1 annual base amount of \$15,290,363 under the Company's system sales tracker.
2 The base amount of \$15,290,363 is the sum of monthly amounts during the prior
3 test year and it is against those monthly amounts that a monthly credit or charge is
4 calculated. Because these credits and charges represent the difference between
5 anticipated and actual off system sales margins, the Company must adjust the test
6 year expenses accordingly. The net effect during the test year was that the
7 customers paid an additional \$1,351,735 in revenues. These are one-time non-
8 recurring revenues. For ratemaking purposes the Company has reclassified these
9 system sales margins as a negative expense.

10 **Net Line of Credit Adjustment**
(Section V, Workpaper S-4, Page 19)

11 **Q. WHAT IS THE NET LINE OF CREDIT ADJUSTMENT?**

12 A. This adjustment includes in the Company's test year cost of service its actual net
13 line of credit fee incurred for the twelve months ending March 31, 2013 in the
14 amount of \$637,630 that increases expenses.

15 **Reliability Adjustment**
(Section V, Workpaper S-4, Page 20)

16 **Q. WHAT IS THE RELIABILITY ADJUSTMENT?**

17 A. In the Unanimous Settlement Agreement in Case No. 2009-00459, the Company
18 proposed and was granted a test year reliability O&M expenditure of \$17,237,965
19 yearly. The actual test year amount was \$17,930,820 or \$692,855 above the
20 authorized expenditure level. This adjustment is required to fully comply with the
21 findings of the Commission's previous case by decreasing the Company's
jurisdictional O&M Expense by \$692,162.

Interest Synchronization Adjustment
(Section V, Workpaper S-4, Page 21)

1 **Q. WHY IS AN INTEREST SYNCHRONIZATION ADJUSTMENT**
2 **NECESSARY?**

3 A. The purpose of this adjustment is to reflect in the computation of Federal and
4 State Income Taxes included in the test period cost of service and the interest
5 expense tax deduction that will result based upon the capital costs and capital
6 structure included by the Company in this filing. The adjustment resulted in a
7 decrease to state income tax of \$701,159 and a decrease to federal income tax of
8 \$4,303,608 for a total decrease to expenses of \$5,004,767.

Amortization of CSAPR SO₂ Allowance Expense Adjustment
(Section V, Workpaper S-4, Page 29)

9 **Q. PLEASE EXPLAIN THE CSAPR SO₂ ALLOWANCE EXPENSE.**

10 A. The Company purchased CSAPR SO₂ allowances in anticipation of the SO₂
11 market that would have been implemented under CSAPR. The CSAPR was
12 vacated by the United States Circuit Court for the District of Columbia Circuit
13 and, therefore, the Company does not forecast consuming these allowances.
14 However, as discussed in more detail later in my testimony, Kentucky Power
15 prudently incurred costs for those allowances and is seeking recovery of those
16 costs. The \$68,950 adjustment to expenses that Kentucky Power proposes
17 represents a five year amortization of the \$350,000 total cost.

AFUDC Offset Adjustment
(Section V, Workpaper S-4, Page 37)

1 **Q. PLEASE EXPLAIN AFUDC OFFSET ADJUSTMENT.**

2 A. The March 31, 2013 balance of Construction Work In Progress (CWIP) was used
3 in the determination of Rate Base. Consistent with prior Commission practice for
4 the Company, an Allowance for Funds Used During Construction (AFUDC)
5 “offset” adjustment is being made to record AFUDC above the line. The CWIP
6 balance was \$43,807,564 on March 31, 2013 of which \$2,705,458 is not subject
7 to AFUDC. The remaining balance of \$41,102,106 is subject to AFUDC. Using
8 the requested overall return of 8.08%, the annualized AFUDC is \$3,321,050. The
9 AFUDC booked during the test year was \$1,941,629 requiring an adjustment to
10 increase the AFUDC offset by jurisdictional amount of \$1,368,889. The Deferred
11 Federal Income Taxes (DFIT) associated with the borrowed funds portion of the
12 \$3,321,050 is \$486,683. The booked DFIT on the borrowed funds portion was
13 \$281,855. This increases DFIT by \$204,828. The net effect is a jurisdictional
14 increase of \$202,780.

Annualization of Employee Related Expenses Adjustment
(Section V, Workpaper S-4, Pages 38-43)

15 **Q. PLEASE EXPLAIN THE ANNUALIZATION OF EMPLOYEE RELATED**
16 **EXPENSES.**

17 A. During the test year, wage increases were granted, employee benefit plan costs
18 escalated, and payroll related taxes increased. Page 38 of Workpaper S-4
19 summarizes this adjustment, which increases jurisdictional O&M Expenses by
20 \$609,325 and Taxes Other Than Income Taxes by \$39,601 to annualize the test

1 year increases in labor and other employee related expenses incurred by the
2 Company during the test year. Pages 39-43 of Workpaper S-4 provide further
3 details supporting the adjustment.

4 The annualization of wages and salary increases, medical plan costs, life
5 insurance costs, dental plan costs, long term disability insurance costs and savings
6 plan costs were done to reflect the ongoing level of expense at the end of the test
7 year period. The annualization of Federal Insurance Contributions Act (FICA)
8 tax expense reflects the wage and salary increases to the Old Age Survivors &
9 Disability Insurance (OASDI) and Medicare rates and employee maximum base.

Annualization of Mitchell Plant Employee Related Expenses Adjustment
(Section V, Workpaper S-4, Page 50-55)

10 **Q. PLEASE EXPLAIN THE ANNUALIZATION OF EMPLOYEE RELATED**
11 **EXPENSES RELATED TO THE MITCHELL PLANT.**

12 A. In order to account for the addition of 50% of the Mitchell Plant, annualization of
13 employee expenses for the Mitchell Plant was necessary. The Company used the
14 same process to annualize the costs related to the Mitchell Plant that it utilized for
15 the Company as a whole. Page 50 of Workpaper S-4 summarizes this adjustment,
16 which increases jurisdictional O&M Expenses by \$30,375 and Taxes Other Than
17 Income Taxes by \$12,275 to annualize the test year increases in labor and other
18 employee related expenses incurred by the Company during the test year. Pages
19 51-55 of Workpaper S-4 provide further details supporting the adjustment.

Mitchell Plant AFUDC Offset Adjustment
(Section V, Workpaper S-4, Page 58)

1
2

3 **Q. PLEASE EXPLAIN THE AFUDC OFFSET FOR THE MITCHELL**
4 **PLANT.**

5 A. The AFUDC offset for the Mitchell Plant was calculated in the same manner as it
6 was for the rest of the Company. The adjustment for the Mitchell Plant results in
7 an increase in the AFUDC offset by jurisdictional amount of \$3,647,948 and a
8 jurisdictional increase in DFIT of \$815,801.

VIII. TARIFF REVISIONS

System Sales Clause
(Tariff S.S.C.)

9 **Q. IS THE COMPANY PROPOSING ANY MODIFICATIONS TO THE**
10 **TREATMENT OF SYSTEM SALES OR TARIFF S.S.C. IN THIS**
11 **PROCEEDING?**

12 A. Yes. First, as has been the practice in past cases, the Company proposes to update
13 the system sales margin included in base rates to the Company's actual test year
14 system sales. This updated system sales margin is reflected in Tariff S.S.C., the
15 System Sales Clause, to determine whether any monthly charge or credit to the
16 customer for off system sales is required.

17 In addition, Kentucky Power proposes an additional provision to Tariff S.S.C. to
18 reflect the expected increase in system sales during the expected seventeen month
19 period following the proposed transfer of an undivided 50% interest in the
20 Mitchell Generating Station ("Mitchell Plant Transfer") and prior to the

1 retirement of Big Sandy Unit 2 (“Overlap Period”). This change to the tariff is
2 designed to provide rate mitigation during the Overlap Period.

3 **Q. HOW ARE KENTUCKY POWER’S SYSTEM SALES CURRENTLY**
4 **TREATED?**

5 A. Kentucky Power provides a margin for system sales in its base rates that reflects
6 the system sales made by the Company during the test year period. Tariff S.S.C.
7 is then utilized to provide a sharing between customers and Kentucky Power on
8 any system sales that are made "over" or "under" the base amount. Tariff S.S.C.
9 provides the monthly base amounts and currently utilizes a sixty percent-forty
10 percent sharing of system sales. In the event that system sales exceed the monthly
11 amount in base rates, customers get one hundred percent of the base margin plus
12 an additional sixty percent of any system sales that exceed the corresponding
13 monthly amount.

14 Conversely, if system sales fall below the base monthly amount, this shortfall is
15 also split with customers sixty percent forty percent, meaning customers will
16 receive a Tariff S.S.C. charge that returns sixty percent of any shortfall in actual
17 system sales.

18 **Q. WHAT CHANGE IS THE COMPANY PROPOSING TO MAKE TO**
19 **TARIFF S.S.C. AND WHY?**

20 A. Kentucky Power is proposing a new temporary provision to Tariff S.S.C. that
21 provides to its customers one hundred percent of system sales during the Overlap
22 Period up to \$30 Million annually and splits amounts over or under this amount
23 using the same historical sixty percent forty percent between customers and the

1 Company, respectively. This increase is temporary since it is only in effect
2 during the Overlap Period. This proposed revision is reflected in the language of
3 Exhibit RKW-1 [Tariff S.S.C.] that describes the applicable period of the
4 modified system sales sharing formula.

5 **Q. WHY IS THE PROPOSED ASSET TRANSFER EXPECTED TO RESULT**
6 **IN A TEMPORARY INCREASE IN OSS MARGINS?**

7 A. The timing of the proposed Mitchell Plant Transfer is anticipated to occur on
8 January 1, 2014, while the operation of Big Sandy Unit 2 may continue until, at
9 the latest, May 31, 2015. Therefore, Kentucky Power is expected to be
10 temporarily surplus during the Overlap Period so long as Big Sandy Unit 2
11 remains in operation. The excess energy that Kentucky Power will be able to
12 offer for sale into the market will result in an expected increase in OSS margins.
13 The Company is proposing rate mitigation through an additional provision change
14 to Tariff S.S.C. in order to provide customers with the benefit of these additional
15 system sales during the Overlap Period.

16 **Q. WHAT IS THIS RATE MITIGATION?**

17 A. The Company is proposing an additional provision in Tariff S.S.C. that, during
18 the Overlap Period, provides one hundred percent or more of all system sales
19 margins received up to a total of \$30 Million on an annual basis for its retail
20 customers. This represents an increase of approximately 124% to the system
21 sales margin amount from the test year ending March 31, 2013 as shown in
22 Exhibit RKW-1 [Tariff S.S.C.]. For system sales during the Overlap Period
23 above or below the \$30 Million amount, the credits and charges will be shared

1 between customers and Kentucky Power using the existing sixty percent-forty
2 percent split. This proposed change has the effect of increasing the retail portion
3 of the system sales base rate credit from \$13.4 Million to \$30 Million during the
4 Overlap Period.

5 **Q. WHY ISN'T KENTUCKY POWER PROPOSING THIS ADJUSTMENT**
6 **TO THE BASE CREDIT?**

7 A. Kentucky Power anticipates that a higher level of systems sales will occur during
8 the Overlap Period. However, because Big Sandy Unit 2 is scheduled for
9 retirement, Kentucky Power cannot be certain that Big Sandy Unit 2 will be able
10 to operate until its scheduled retirement date of May 31, 2015. Consequently,
11 Kentucky Power is proposing to modify Tariff S.S.C by synching up the larger
12 sharing credit with the Overlap Period which will end when Big Sandy Unit 2 is
13 retired. Such an adjustment could not be made to base rates.

14 **Q. PLEASE EXPLAIN HOW THE FORMULA FOR THIS PERIOD IS**
15 **DERIVED.**

16 A. On a retail jurisdictional basis, the proposed \$30 Million system sales credit
17 during the Overlap Period is 2.24 times the \$13.4 Million retail portion of the
18 \$13.6 Million total company system sales received during the test year. This
19 information is shown in Section 3 of Exhibit RKW-1. In addition, \$30 Million
20 system sales credit during the Overlap Period is 1.24 times greater than test year
21 retail jurisdictional amount (2.24 minus 1). The Company used these multipliers
22 in the formula to gross-up the test year level to \$30 Million. Therefore, on a
23 monthly basis, this formula will provide 1.24 times the monthly base margin as a

1 credit regardless of the system sales actually generated. The 2.24 multiplier is
 2 then used to adjust for actual system sales above or below \$30 Million.

3 **Q. HOW MUCH WILL THE PROPOSED TARIFF S.S.C. MITIGATE THE**
 4 **REVENUE REQUIREMENT?**

5 A. The potential benefit to customers from the Overlap Period Tariff S.S.C. relative
 6 to the current Tariff S.S.C. is shown in Table RKW-1 for various levels of system
 7 sales.

Table RKW-1 - Base Rate Credit^[Note] plus Tariff S.S.C. Charge/Credit

Retail System Sales Margins (\$ Millions)	Customer Credit W/O Overlap Period Mod. to Tariff S.S.C.		Customer Credit With Overlap Period Mod. to Tariff S.S.C.	
	Credit (\$Millions)	Percent of Total Margins	Credit (\$Millions)	Percent of Total Margins
\$0	\$5.4	Guaranteed	\$12.0	Guaranteed
\$10	\$11.4	113.6%	\$18.0	180.0%
\$20	\$17.4	86.8%	\$24.0	120.0%
\$30	\$23.4	77.9%	\$30.0	100.0%
\$40	\$29.4	73.4%	\$36.0	90.0%
\$50	\$35.4	70.7%	\$42.0	84.0%
\$60	\$41.4	68.9%	\$48.0	80.0%
\$70	\$47.4	67.7%	\$54.0	77.1%
\$80	\$53.4	66.7%	\$60.0	75.0%
\$90	\$59.4	66.0%	\$66.0	73.3%
\$100	\$65.4	65.4%	\$72.0	72.0%
\$110	\$71.4	64.9%	\$78.0	70.9%

Note: Values shown include change in base rate credit to \$13.4 Million from current \$15.3 Million based on test year system sales data.

1 **Q. WHAT BENEFITS TO CUSTOMERS DOES THE MODIFIED**
2 **PROVISION PROVIDE?**

3 A. First and foremost, Kentucky Power is accepting a sizeable risk in modifying
4 Tariff S.S.C. as proposed. This, in turn, removes a certain level of risk from
5 customers. While the Tariff S.S.C. provision reverts to the historic norm
6 following the Overlap Period, until that time, Kentucky Power is providing higher
7 levels of system sales to customers in terms of the percent shared, even if that
8 amount exceeds 100 percent of the total system sales. This sharing mechanism
9 will hold true even if Big Sandy Unit 2 is down for extended periods, so long as it
10 is still planned or available for further operation.

11 **Q. PLEASE PROVIDE AN EXAMPLE OF WHAT RISK THE COMPANY IS**
12 **INCURRING?**

13 A. Although not a realistic assumption, in order to show the absolute minimum
14 guaranteed, a level of zero system sales is shown in the table. As shown, even if
15 no system sales are generated by Kentucky Power in 2014, customers will still get
16 a credit of \$12 Million dollars which represents forty percent of \$30 Million.
17 This is nearly equivalent to guaranteeing the entire base period amount of \$13.4
18 Million.

19 **Q. HOW WAS THE \$30 MILLION VALUE IDENTIFIED?**

20 While Kentucky Power forecasts that annual system sales in 2014 will exceed \$30
21 Million, the uncertainties of the market mean that Kentucky Power may not
22 achieve those sales. Considering the forecast sales amounts and the uncertainties
23 of the market, Kentucky Power identified the \$30 Million baseline as a reasonable

1 adjustment to Tariff S.S.C. during the Overlap Period. Kentucky Power will
2 remain obligated, between the base rate margin and Tariff S.S.C. to provide one
3 hundred percent of all system sales actually generated below \$30 Million plus
4 forty percent of any shortfall on top of the actual system sales, for a total that
5 would exceed one hundred percent if the Company does not achieve at least \$30
6 Million. The \$30 million baseline provides, in the Company's view, a fair and
7 reasonable margin to customers and -- only above this amount -- will Kentucky
8 Power retain some portion of the system sales.

9 **Q. ARE THERE ANY OTHER CHANGES PROPOSED TO TARIFF S.S.C.?**

10 A. Yes. Some wording changes are proposed to reflect the elimination of the Pool
11 Agreement as of January 1, 2014. Kentucky Power's system sales will be as
12 recorded on its books, and references to the AEP System or related allocations are
13 no longer necessary.

Purchased Power Adjustment
(Tariff P.P.A.)

14 **Q: WHY HAS THE COMPANY PROPOSED A NEW PURCHASED POWER**
15 **ADJUSTMENT TARIFF?**

16 A. The Company is proposing the new Purchased Power Adjustment (Tariff P.P.A.)
17 as a mechanism to recover costs associated with purchasing power from the
18 market following the termination of the Pool Agreement on January 1, 2014. A
19 copy of the proposed Power Purchase Adjustment (Tariff P.P.A.) is attached as
20 Exhibit RKW-2.

1 **Q: WHAT IS THE CURRENT STATUS OF THE “AEP POOL”?**

2 A: On December 17, 2010, the member companies noticed one another, under
3 Section 13.2 of the AEP Pool Agreement, with their intention to terminate the
4 AEP Pool effective January 1, 2014. On October 31, 2012, the member
5 companies filed with the Federal Energy Regulatory Commission requesting that
6 the pool be terminated in Docket EC13-234 Section 205: Termination of
7 Interconnection Agreement and a new Power Coordination Agreement (PCA) be
8 approved for use by the four member companies in Docket EC13-232 Section
9 205: Power Coordination Agreement among APCo / I&M / Kentucky Power and
10 AEPSC as Agent. These have not yet been ruled on by FERC.

11 **Q. WHY IS A NEW PURCHASED POWER ADJUSTMENT NECESSARY?**

12 A. With the termination of the Pool Agreement, Kentucky Power will no longer have
13 ready access to capacity from other members of the AEP-East Pool. As a result,
14 the Company may be required to obtain capacity from the market to meet its PJM
15 capacity requirements in the event that it cannot meet those requirements via its
16 existing resources.

17 **Q. HOW WILL THE NEW PURCHASED POWER ADJUSTMENT WORK?**

18 A. The purchased power adjustment shall provide for monthly adjustments based on
19 a percent of revenues, equal to the net costs of any power purchases in the current
20 period. The net costs of any power purchases shall exclude costs recovered
21 through the Fuel Adjustment Clause and shall be computed as the sum of (1) the
22 cost of power purchased by the Company through new Purchased Power
23 Agreements (PPAs), less the net energy cost of such power purchases (PPA(m)),

1 (2) the cost of fuel related substitute generation, less the cost of fuel which would
2 have been used in plants suffering forced generation or transmission outages
3 (RP(m)), and (3) a contract management fee equal to 8.08% of PPA(m).

4 **Q. IS THE COMPANY CURRENTLY A PARTY TO ANY PURCHASED**
5 **POWER AGREEMENTS TO WHICH THE PROPOSED PURCHASED**
6 **POWER ADJUSTMENT WOULD APPLY?**

7 A. No. However, with the termination of the Pool Agreement on January 1, 2014, it
8 is prudent to plan for the possibility that new purchased power agreements will be
9 required to meet the Company's PJM capacity requirements. This planning
10 includes developing an obtaining approval of a cost recovery mechanism.

11 **IX. EMISSION ALLOWANCES**

12 **Q. HOW ARE THE EMISSION ALLOWANCES ACCOUNTED FOR BY**
13 **KENTUCKY POWER?**

14 A. Emission allowances are accounted for differently for compliance and accounting
15 purposes. For compliance purposes, allowances are held and the allowances are
16 surrendered at the end of an annual or seasonal compliance period to match
17 consumption. From an accounting perspective, emission allowances are kept on
18 the company's books at an average inventory cost of the allowances held. For
19 instance, when Cross-State Air Pollution Rule (CSAPR) emission allowances
20 were allocated by the US EPA, they were done so at zero cost. As such, using
21 those allowances for consumption would result in zero dollars in emission
22 expense. However, if Kentucky Power purchases allowances to meet its emission
23 obligation, then (subsequent to purchase) each allowance held will be valued at

1 the average cost of all allowances held in inventory, including those allocated and
2 purchased.

3 **Q. DOES KENTUCKY POWER PLAN TO ACCOUNT FOR CSAPR**
4 **ALLOWANCES DIFFERENTLY THAN THOSE ALLOWANCES**
5 **ASSOCIATED WITH PRIOR ENVIRONMENTAL REGULATIONS?**

6 A. No. Kentucky Power has been accounting for, and recovering costs associated
7 with, Title IV sulfur dioxide (SO₂) allowances under the Clean Air Act (CAA) as
8 well as SO₂ and nitrogen oxide (NO_x) allowances under the Clean Air Interstate
9 Rule (CAIR), over the lives of those rules. While CSAPR emission allowances
10 will be held in different sub-accounts to differentiate between them and the
11 allowances created under other regulations in accordance with FERC Uniform
12 System of Accounts, the allowances themselves will be subject to the same
13 accounting procedures regarding value, gains and losses, and surrender, as the
14 allowances under the other regulations.

15 **Q. IS IT REASONABLE FOR KENTUCKY POWER TO RECOVER ITS**
16 **PRUDENTLY INCURRED COSTS ASSOCIATED WITH CSAPR**
17 **EMISSIONS ALLOWANCES?**

18 A. Yes. The CSAPR was designed, in part, as a replacement for the CAIR, and
19 Kentucky Power is proposing to recover the cost of emission allowances under
20 the CSAPR just as it has previously done under Title IV of the CAA and the
21 CAIR. Other than the fact that the allowances were created under a different
22 rulemaking, there is no difference in the rationale for recovery of the costs
23 associated with emission allowances.

1 **Q. WHAT IS THE MAGNITUDE OF THE COSTS THAT KENTUCKY**
2 **POWER HAS INCURRED FOR EMISSION ALLOWANCES UNDER THE**
3 **CSAPR?**

4 A. Kentucky Power purchased \$350,000 in CSAPR allowances in November 2011,
5 less than two months prior to the rule going into effect. These allowances were
6 purchased through an auction, with the purchase having been made in anticipation
7 of Kentucky Power needing allowances to maintain compliance with the CSAPR.

8 **Q. WHAT IS THE CURRENT STATUS OF THE CSAPR?**

9 A. After staying the effectiveness of CSAPR in December, 2011, the Court of
10 Appeals for the District of Columbia Circuit vacated the CSAPR in August, 2012.
11 The United States Environmental Protection Agency (USEPA) petitioned the
12 United States Supreme Court to review the vacatur decision on the CSAPR, and
13 the Court announced on June 24 that it has accepted the petition. A decision from
14 the Court on the review is not expected until sometime in the first half of 2014. In
15 the absence of the CSAPR, the CAIR remains in effect.

16 **Q. WITH THE CSAPR HAVING BEEN VACATED, WHAT IS KENTUCKY**
17 **POWER'S FORECAST FOR CONSUMPTION OF CSAPR**
18 **ALLOWANCES?**

19 A. Currently, with the vacatur of the CSAPR, there is no forecasted consumption of
20 CSAPR allowances. However, because Kentucky Power prudently incurred costs
21 associated with CSAPR allowances prior to the stay and eventual vacatur of the
22 rule, Kentucky Power is requesting authority to recover the cost of CSAPR
23 allowances.

1 **Q. WHAT IS KENTUCKY POWER'S PROPOSAL WITH REGARD TO**
2 **RECOVERY OF CSAPR ALLOWANCE COSTS?**

3 A. Kentucky Power is proposing to recover the \$350,000 in CSAPR allowance costs
4 over the next five years. Details regarding the adjustment to the test year data for
5 recovering the CSAPR allowance costs are described in Section V, Workpaper S-
6 4, Page 29.

7
8 **X. BIG SANDY PLANT DEFERRAL AND AMORTIZATION/RECOVERY**
9 **OF O&M AND DEPRECIATION EXPENSES**

10 **Q. CAN YOU EXPLAIN THE PROPOSED DEFERRAL OF THE BIG SANDY**
11 **O&M AND DEPRECIATION EXPENSES?**

12 A. Due to the planned retirement of Big Sandy Unit 2 and the potential retirement of
13 Big Sandy Unit 1, the Company is proposing to remove the Big Sandy Plant
14 depreciation and production O&M expenses from the test year and requesting that
15 the estimated Big Sandy Plant depreciation and production O&M expenses for the
16 17 month period prior to the retirements be recovered over five years starting on
17 January 1, 2014. The accounting details of the Company's proposed treatment
18 including over/under accounting true-up to the actual costs are described in the
19 testimony of Company Witness Mitchell.

20 **Q. WHY IS THE COMPANY PROPOSING TO DEFER AND AMORTIZE**
21 **THESE EXPENSES?**

22 A. The proposed deferral and amortization of Big Sandy depreciation and O&M
23 expenses serves as rate mitigation for the Company's customers during the
24 Overlap Period when Kentucky Power will have ownership of 50% of the

1 Mitchell Plant prior to the planned retirement of Big Sandy Unit 2. The proposed
2 treatment spreads these 17 months of costs over five years.

3 **XI. AMORTIZATION AND RECOVERY OF REGULATORY ASSETS AND**
4 **DEFERRED COSTS**

5 **Q: IS THE COMPANY PROPOSING TO AMORTIZE AND RECOVER ANY**
6 **REGULATORY ASSETS AND DEFERRED COSTS IN THIS CASE?**

7 A. Yes. As described in the testimony of Company Witness Mitchell, the Company
8 is seeking to amortize and recover regulatory assets and deferred costs associated
9 with the Company's post-retirement benefits, IGCC, CCS FEED Study, the
10 CARRS site and the Preliminary Big Sandy flue gas desulfurization ("FGD")
11 system investigation costs. The recovery of these assets and costs is described
12 below, with the exception of those associated with the Company's post-retirement
13 benefits. Company Witness Bartsch discusses the creation of the post-retirement
14 benefit regulatory asset, and Company Witness McCoy supports the 12 year
15 amortization period for recovering that asset.

16 **Q. PLEASE DESCRIBE THE IGCC RELATED COSTS THE COMPANY IS**
17 **SEEKING TO RECOVER.**

18 A. The Company incurred preliminary engineering and development costs relating to
19 the potential construction and operation of an integrated gasification combined
20 cycle ("IGCC") generation facility in Kentucky. The feasibility of the IGCC
21 facility depended on the Kentucky Legislature adopting legislation that would
22 support the recovery of the facility's costs through rates. The Legislature failed to
23 adopt such legislation and, as a result, the facility became uneconomic. The

1 preliminary engineering and development costs were, however, prudently
2 incurred in support of this facility.

3 **Q. PLEASE DESCRIBE THE COSTS ASSOCIATED WITH THE CCS FEED**
4 **STUDY.**

5 A. As part of its investigations to address emerging environmental regulations, AEP
6 conducted a carbon capture and sequestration (“CCS”) study at its Mountaineer
7 generating station in West Virginia. Because the benefits of the study would be
8 enjoyed by each operating company that owned coal-fired generation units with
9 the potential of being retrofitted with CCS technology, AEP allocated the costs
10 among those companies. The Company is now seeking to amortize and recover
11 its share of the CCS study costs. The Company prudently incurred these costs as
12 part of the investigation of mechanisms to address into viable technologies that
13 could be used to mitigate emissions of carbon dioxide from Kentucky Power and
14 AEP coal-fired power plants.

15 **Q. PLEASE DESCRIBE THE COSTS THE COMPANY IS SEEKING TO**
16 **RECOVER RELATED TO THE CARRS SITE.**

17 A. As part of its long-term planning, the Company purchased property (the “Carrs
18 Site”) in Lewis County, Kentucky as a potential site for a new generation facility.
19 In addition, the Company conducted preliminary site design and engineering work
20 to support developing the property. The Company has elected not to pursue the
21 construction of new generation at the Carrs Site at this time. As described above,
22 the Company has removed the land-related costs for this site from rate base. The
23 Company is seeking, however, to recover the engineering and site design costs.

1 The Company prudently incurred these costs as part of its long-term generation
2 resource planning.

3 **Q. PLEASE DESCRIBE THE PRELIMINARY BIG SANDY FGD**
4 **REGULATORY ASSETS.**

5 A. Beginning in 2004, the Company began evaluating potential methods to comply
6 with emerging environmental regulations under the Clean Air Act at the Big
7 Sandy Plant. This investigation included engineering and design work related to
8 the potential installation of wet and dry flue gas desulfurization systems at the
9 plant. In the end, the Company's evaluation showed that the transfer of a 50%
10 interest in the already-scrubbed Mitchell Plant was the least cost-alternative for
11 the Company and its customers. The Company prudently incurred the
12 preliminary Big Sandy FDG investigation costs as part of its comprehensive
13 evaluation of options to address the effect of emerging environmental regulations
14 at Big Sandy Unit 2.

15 **Q. WHAT IS THE PROPOSED AMORTIZATION PERIOD FOR THESE**
16 **COSTS?**

17 A. The Company is seeking to recover each of the costs described above in my
18 testimony over twenty-seven (27) years. This amortization period corresponds
19 with the expected remaining life of the Mitchell Units. By spreading the costs
20 over this lengthy period, the Company is able to mitigate the impact on its
21 customers.

22 **Q. DOES THIS CONCLUDE YOUR PRE-FILED DIRECT TESTIMONY?**

23 A: Yes.



1



TARIFF S. S. C.
(System Sales Clause)

APPLICABLE.

To Tariffs R.S., R.S.-L.M.-T.O.D., R.S.-T.O.D., Experimental R.S.-T.O.D.2, S.G.S., Experimental S.G.S.-T.O.D., M.G.S., M.G.S.-T.O.D., L.G.S., L.G.S.-T.O.D., Q.P., C.I.P.-T.O.D., C.S.- I.R.P., M.W., O.L. and S.L.

RATE.

- 1. When the monthly net revenues from system sales are above or below the monthly base net revenues from system sales, as provided in paragraph 3 below, an additional credit or charge equal to the product of the KWHs and a system sales adjustment factor (A) shall be made, where "A", calculated to the nearest 0.0001 mill per kilowatt-hour, is defined as set forth below.

For the period beginning January 2014 through the end of the month in which Big Sandy Unit 2 ends commercial operation, the monthly System Sales Adjustment Factor shall be the following: (T)

$$\text{System Sales Adjustment Factor (A)} = (1.24Tb + 0.6[Tm - 2.24Tb]) / Sm$$
 (T)

For all months following the month in which Big Sandy Unit 2 ends commercial operation, the monthly System Sales Adjustment Factor shall be the following: (T)

$$\text{System Sales Adjustment Factor (A)} = (0.6 [Tm - Tb]) / Sm$$

In the above formulas "T" is Kentucky Power Company's (KPCo) monthly net revenues from system sales in the current (m) and base (b) periods, and "S" is the KWH sales in the current (m) period, all defined below.

- 2. The net revenue from KPCo's sales as reported in the Federal Energy Regulatory Commission's Uniform System of Accounts under Account 447, Sales for Resale, shall consist of and be derived as follows: (T)

a. KPCo's total revenues from system sales as recorded in Account 447, less b. and c. below. (T)

b. KPCo's total out-of-pocket costs incurred in supplying the power and energy for the sales in a. above. (T)

The out-of-pocket costs include all operating, maintenance, tax, transmission losses and other expenses that would not have been incurred if the power and energy had not been supplied for such sales, including demand and energy charges for power and energy supplied by Third Parties.

c. KPCo's environmental costs allocated to non-associated utilities in the Company's Environmental Surcharge Report.

(Cont'd on Sheet No. 19-2)

DATE OF ISSUE JUNE 28, 2013

DATE EFFECTIVE SERVICE RENDERED ON AND AFTER JULY 29, 2013

ISSUED BY
TITLE: MANAGER OF REGULATORY SERVICES

BY AUTHORITY OF ORDER BY THE PUBLIC SERVICE COMMISSION

IN CASE NO. 2013-00197 DATED

TARIFF S. S. C. (Cont'd.)
(System Sales Clause)

3. The base monthly net revenues from system sales are as follows:

Billing Month	System Sales (Total Company Basis)	
January	\$ 528,886	\$1,269,435
February	335,167	652,568
March	1,530,489	804,420
April	1,371,521	737,801
May	1,307,472	1,050,028
June	767,124	1,291,406
July	616,234	2,483,188
August	2,136,652	1,287,658
September	1,850,577	1,210,409
October	1,739,665	1,158,991
November	1,538,455	573,454
December	1,568,121	1,063,250
	<u>\$15,290,363</u>	<u>\$13,582,608</u>

(I)
(I)
(R)
(R)
(R)
(I)
(I)
(R)
|
(R)

- Sales (S) shall be equated to the sum of (a) generation (including energy produced by generating plant during the construction period), (b) purchase, and (c) interchange-in, less (d) energy associated with pumped storage operations, less (e) inter-system sales and less (f) total system losses.
- The system sales adjustment factor shall be based upon estimated monthly revenues and costs for system sales, subject to subsequent adjustment upon final determination of actual revenues and costs.
- The monthly System Sales Clause shall be filed with the Commission ten (10) days before it is scheduled to go into effect, along with all the necessary supporting data to justify the amount of the adjustments, which shall include data, and information as may be required by the Commission.
- Copies of all documents required to be filed with the Commission under this regulation shall be open and made available for public inspection at the office of the Public Service Commission pursuant to the provisions of KRS 61.870 to 61.884.

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BY AUTHORITY OF ORDER BY THE PUBLIC SERVICE COMMISSION

IN CASE NO. 2013-00197 DATED

KENTUCKY POWER COMPANY

P.S.C. KY. NO. 10 ORIGINAL SHEET NO. 35-1
CANCELING P.S.C. KY. NO. 10 SHEET NO. 35-1

TARIFF P.P.A.
(Purchase Power Adjustment)

APPLICABLE.

To Tariff's R.S., R.S.-L.M.-T.O.D., R.S.-T.O.D., Experimental R.S.-T.O.D.2, S.G.S., Experimental S.G.S.-T.O.D., M.G.S., M.G.S.-T.O.D., L.G.S., L.G.S.-T.O.D., Q.P., C.I.P.-T.O.D., C.S.- I.R.P., M.W., O.L. and S.L.

RATE.

1. The purchase power adjustment shall provide for monthly adjustments based on a percent of revenues, equal to the net costs of any power purchases in the current period according to the following formula:

$$\text{Monthly Purchase Power Adjustment Factor} = \frac{\text{Net KY Retail P(m)}}{\text{KY Retail R(m)}}$$

Where:

Net KY Retail P(m) = Monthly P(m) allocated to Kentucky Retail Customers, net of Over/(Under) Recovery Adjustment; Allocation based on Percentage of Kentucky Retail Revenues to Total Company Revenues in the Expense Month (m). (For purposes of this formula, Total Company Revenues include only Retail and Full-Requirements Wholesale revenues.)

KY Retail R(m) = Kentucky Retail Revenues for the Expense Month (m).

2. The net costs of any power purchased shall exclude costs recovered through the Fuel Adjustment Clause and shall be computed as the sum of the following items:
- a. PPA(m) = The cost of power purchased by the Company through new Purchase Power Agreements (PPAs) less the net energy cost of such power purchases.
 - b. RP(m) = The cost of fuel related substitute generation less the cost of fuel which would have been used in plants suffering forced generation or transmission outages.
 - c. CM(m) = The contract management fee equal to a percentage (equal to the Company's most recently approved weighted average cost of capital) of PPA(m).

$$\text{Monthly P(m)} = \text{PPA(m)} + \text{RP(m)} + \text{CM(m)}$$

3. The monthly purchase power adjustment shall be filed with the Commission ten (10) days before it is scheduled to go into effect, along with all the necessary supporting data to justify the amount of the adjustment, which shall include data, and information as may be required by the Commission.
4. Copies of all documents required to be filed with the Commission shall be open and made available for public inspection at the office of the Public Service Commission pursuant to the provisions of KRS61.870 to 61.884

DATE OF ISSUE JUNE 28, 2013DATE EFFECTIVE SERVICE RENDERED ON AND AFTER JULY 29, 2013

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(N)

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