#### COMMONWEALTH OF KENTUCKY

# RECEIVED

#### BEFORE THE PUBLIC SERVICE COMMISSION

SEP 0 1 2006

In the Matter of:	PUBLIC SERVICE COMMISSION
-------------------	------------------------------

AN EXAMINATION BY THE PUBLIC SERVICE	)		
COMMISSION OF THE ENVIRONMENTAL	)		
SURCHARGE MECHANISM OF KENTUCKY	)		
POWER COMPANY FOR THE SIX-MONTH	)	CASE NO.	
BILLING PERIODS ENDING DECEMBER 31, 2002,	)	2006-00128	
DECEMBER 31, 2003, JUNE 30, 2004,	)		
DECEMBER 31, 2004, AND DECEMBER 31, 2005,	)		2
AND FOR THE TWO-YEAR BILLING PERIODS	)		
ENDING JUNE 30, 2003 AND JUNE 30, 2005	)		

# MOTION FOR LEAVE TO FILE A REVISED RESPONSE TO THE COMMISSION'S ORDER OF JULY 24, 2006, AND TO MAKE A SUPPLEMENTAL FILING INTO THE RECORD

Kentucky Power Company, by counsel, respectfully moves the Commission to allow the Company to file a revised response to its Order of July 24, 2006, which directed Kentucky Power to advise the Commission if the case "should be submitted for adjudication based on the existing record without a hearing." On July 27<sup>th</sup>, the Company filed a Response, advising that "it is Kentucky Power's position that this case should be submitted for adjudication based on the existing record." Based on circumstances discovered since this Response, as explained below, Kentucky Power would like to submit a Supplemental Response to PSC Data Request #1 (first set) presenting an underrecovery of environmental costs in the amount of \$158,592.

As set forth in the attached tendered Supplemental Response, in Kentucky Power's last environmental surcharge case, Case No. 2005-00068, the Commission approved Kentucky Power's portion of the Rockport Unit Power low NOx burner investment in the Company's Environmental Compliance Plan. However, from July 2005 to date, the Company has inadvertently failed to include Kentucky Power's portion of the Rockport low NOx burner

investment costs (*i.e.*, those incurred under the Rockport lease agreement) in its ES Form 3.20 Monthly Filings; and has failed to reflect those costs in the monthly billings. This resulted in an underrecovery of \$151,707.

Also, the Company also discovered a minor 1% error in allocation in December 2005, which resulted in an underrecovery of \$6,885. Thus, the total underrecovery for these two items is \$158,592.

These oversights were discovered in late August 2006 as Kentucky Power personnel were reviewing the environmental surcharge schedules associated with the 2006 Environmental Surcharge filing, Case No. 2006-00307.

Kentucky Power sincerely regrets the errors made in its 2005 filings, which resulted in an underrecovery of \$158,592. Because KRS 278.183 directs that electric utilities are entitled to recover their approved costs of complying with the Federal Clean Air Act, the Company respectfully requests the Commission to allow the record in this case to be supplemented with the attached Supplemental Response to Commission Data Request #1 (first set); and to set a revised procedural schedule allowing the parties to make any proper inquiry into the costs sought to be recovered via the supplemental filing.

Respectfully submitted;

Bruce F. Clark

R. Benjamin Crittenden

STITES & HARBISON PLLC

421 West Main Street

P.O. Box 634

Frankfort, Kentucky 40602-0634

Telephone: (502) 223-3477

COUNSEL FOR KENTUCKY POWER

# **CERTIFICATE OF SERVICE**

I hereby certify that a true and accurate copy of the foregoing was served first class mail, postage prepaid, upon the following:

Michael L. Kurtz Boehm, Kurtz & Lowry Suite 1510 36 East Seventh Street Cincinnati, Ohio 45202

Elizabeth E. Blackford Assistant Attorney General Suite 200 1024 Capital Center Drive Frankfort, Kentucky 40601-8204

on this 1st day of September, 2006.

Bruce F. Clark

Sme J. Clark

# **COMMONWEALTH OF KENTUCKY**

# **BEFORE THE**

# RECEIVED

SEP 0 1 2006

PUBLIC SERVICE COMMISSION

# **PUBLIC SERVICE COMMISSION**

# IN THE MATTER OF:

AN EXAMINATION BY THE PUBLIC SERVICE	)	
COMMISSION OF THE ENVIRONMENTAL	)	
SURCHARGE MECHANISM OF KENTUCKY	)	
POWER COMPANY FOR THE SIX-MONTH	)	CASE NO.
BILLING PERIODS ENDING DECEMBER 31, 2002,	)	2006-00128
DECEMBER 31, 2003, JUNE 30, 2004,	)	
DECEMBER 31, 2004, AND DECEMBER 31, 2005,	)	
AND FOR THE TWO-YEAR BILLING PERIODS	)	
ENDING JUNE 30, 2003 AND JUNE 30, 2005	)	

# SUPPLEMENTAL RESPONSE TO

COMMISSION STAFF FIRST SET OF DATA REQUEST, ITEM NO. 1
ON BEHALF OF KENTUCKY POWER COMPANY

KPSC Case No. 2006-00128 Commission Staff First Set of Data Request Order Dated April 25, 2006 Supplemental Response, Item No. 1 Page 1 of 35

# KENTUCKY POWER COMPANY

# **REQUEST**

Prepare a summary schedule showing the calculation of E(m) and the surcharge factor for the expense months covered by the applicable billing period. Use ES Form 1.0 as a model for this summary. Include the expense months for the two expense months subsequent to the billing period in order to show the over- and under- recovery adjustments for the months included for the billing period under review. Include a calculation of any additional over- or under-recovery amount Kentucky Power believes needs to be recognized for each 6-month review or 2-year review. Include all supporting calculations and documentation for any such additional over- or under-recovery.

#### SUPPLEMENTAL RESPONSE

In addition to the costs included in the Company's initial response to this Data Request, in 2005, Kentucky Power incurred additional underrecovery of its environmental costs in the amount of \$158,592. These costs are summarized in this Supplemental Response to PSC Data Request #1, page 3 of 35. This underrecovery is comprised of two factors: (1) For the monthly filings August 2005, September 2005, October 2005, November 2005 and December 2005, the Company's monthly E.S. filings, E.S. Form 3.20, inadvertently failed to include the Company's Rockport unit power costs associated with the low NOx burners, approved by the Commission for inclusion in the Environmental Surcharge by Order dated September 7, 2005, Case No. 2005-00068; and (2) on E.S. Form 3.14 for December 2005, the Company inadvertently used an erroneous "surplus weighting" percentage of 76%, instead of 77%, which was the proper surplus weighting percentage as shown on E.S. Form 3.14, page 2 of 11, line 14.

With regard to the underrecovery of Rockport low NOx burner costs, the Commission's September 7, 2005 Order in Case No. 2005-00068 approved the inclusion of the Rockport low NOx burner investment. See pp. 4-7 of 35. This Order thus affirmed the Company's proposed revised monthly Environmental Surcharge schedules, as per the Company's Response to Commission Staff Data Request, 2<sup>nd</sup> Set, Item 12. See pp. 8-9 of 35. However, because of administrative oversight, the Company failed to include on its monthly Environmental Surcharge schedules the costs associated with Kentucky Power's lease of the Rockport unit. For the 2-year review period, the months affected by the underrecovery are August 2005 through December 2005. See pp. 10-19 of 35.

Attached is a revised E.S. Form 3.20, in the format approved by the Commission in its September 7, 2005 Order in Case No. 2005-00068 for each month affected by the underrecovery, *i.e.*, August – December 2005. See pp. 20-24 of 35.

KPSC Case No. 2006-00128 Commission Staff First Set of Data Request Order Dated April 25, 2006 Supplemental Response, Item No. 1 Page 2 of 35

Also, in Kentucky Power's filing for the month of December, 2005, E.S. Form 3.14, page 2 of 11, the Company included an incorrect entry for the "Ohio Power Surplus Weighting." The correct percentage was 77.00%. (See p. 25 of 35); however, the Company employed a percentage of 76.00%. See pp. 26-34 of 35. The total amount of apportioned cost to Kentucky Power was understated by \$10,578. (See p. 35 of 35.)

The total effect of these erroneous filings resulted in an underrecovery by Kentucky Power of its approved environmental costs in the total amount of \$158,592. See p. 3 of 35. The Company proposes to recover this underrecovery over a 6-month period following approval of the costs.

WITNESS: Errol K. Wagner

# Kentucky Power Company Adjustment of AEP Pool Monthly Environmental Capacity Costs (ES FORM 3.14) and Costs Associated with Rockport Plant - Low NOx Burners (ES FORM 3.20) From August 2005 to December 2005

	August 2005 REVISED AMOUNTS	August 2005 FILED AMOUNTS	Delta	2005 REVISED	September 2005 FILED AMOUNTS	Delta	October 2005 REVISED	2005	Delta	November 2005 REVISED AMOUNTS	November 2005 FILED AMOUNTS	Delta	December 2005 REVISED AMOUNTS	December 2005 FILED AMOUNTS	Delta	Total July to December 2005
ES FORM 3.14 Environmental Costs to Kentucky Power from -												The state of the s			AND THE RESERVE OF THE PROPERTY OF THE PROPERT	
Amos Plant Unit No. 3, Page 3 of 11													\$42,312	\$38,786		
Cardinal Plant Unit 1, Page 4 of 11									İ			2 P	\$42,312	\$42,312		
Gavin Plant (Units 1 & 2), Page 5 of 11												100 mm	\$380,808	\$373,756		
Kammer Plant (Units 1, 2 & 3), Page 6 of 11													\$3,526	\$3,526		
Mitchell Plant (Units 1 & 2), Page 7 of 11													\$7,052	\$7,052		
Muskingum Plant (Units 1, 2, 3, 4 & 5), Page 8 of 11													\$7,052	\$7,052		
Sporn Plant (Unit 1, 2, 3, 4 & 5), Page 9 of 11			ŀ										\$7,052	\$7,052		
Rockport Plant (Units 1 & 2), Page 10 of 11													\$3,526	\$3,526		
Tanner Creek Plant (Units 1 & 2), Page 11 of 11													\$3,526	\$3,526		
TOTAL DIFFERENCE ES FORM 3.14 Page 1 of 11			\$0			\$0			\$0			\$0	\$497,166	\$486,588	\$10,578	\$10,578
ES FORM 3.20 Kentucky Power's Portion of Rockport's CEMS and AEGCo's LNB	\$49,080			\$48,957			\$49,660	)		\$51,889		Control Contro	\$51,763			
Kentucky Power's Portion of Rockport's CEMS		\$3,622			\$3,616			\$3,637			\$3,708			\$3,702		
TOTAL DIFFERENCE ES FORM 3.20			\$45,458			\$45,341			\$46,023			\$48,181			\$48,061	\$233,064
Kentucky Power Environmental Costs before KY Retail Jurisdictional Alocation Factor			\$45,458			\$45,341			\$46,023			\$48,181			\$58,639	\$243,642
August 2005 - Only Applicable to 21 of the 29 Billings Days			\$32,918									School Section (Section Section Sectio				
ES FORM 1.00 - Kentucky Retail Jurisdiction Allocation Factor			67.7%			64.0%			66.2%			67.8%			75.3%	
Total Adjustment			\$22,285			\$29,018			\$30,467			\$32,667			\$44,155	\$158,592

# COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF KENTUCKY POWER COMPANY )
FOR APPROVAL OF AN AMENDED COMPLIANCE )
PLAN FOR PURPOSES OF RECOVERING )
ADDITIONAL COSTS OF POLLUTION CONTROL )
CASE NO.
FACILITIES AND TO AMEND ITS )
ENVIRONMENTAL COST RECOVERY )
SURCHARGE TARIFF )

# ORDER

On March 8, 2005, Kentucky Power Company ("Kentucky Power") filed an application, pursuant to KRS 278.183, seeking Commission approval of an amended environmental compliance plan and to amend its Environmental Surcharge ("E.S.") tariff. Kentucky Power states that the proposed amendments allow it to include the cost of pollution control projects that are required by the Clean Air Act<sup>1</sup> ("CAA") that are charged to it pursuant to Federal Energy Regulatory Commission ("FERC") approved agreements between Kentucky Power and affiliated American Electric Power, Inc. ("AEP") operating companies. Kentucky Power proposed that its amended E.S. tariff become effective for bills rendered on and after April 29, 2005.

On March 21, 2005, the Commission found that further proceedings were necessary to investigate the reasonableness of the proposed amendments to Kentucky

<sup>&</sup>lt;sup>1</sup> As amended, 42 U.S.C.A. § 7401 et seq.

KPSC Case No. 2006-00128 Commission Staff First Set of Data Request Order Dated April 25, 2006 Supplemental Response, Item No. 1

changes. Appendix B of this Order reflects the Commission's determination of the

revised gross-up factor. Kentucky Power should be required to use this factor with the

first monthly surcharge filing submitted after the date of this Order.

The revised gross-up factor will be applied only to the rate of return calculations

for Big Sandy's environmental surcharge rate base. The Commission does not agree

with KIUC that the Section 199 impact should be applied to the rate of return for the

Rockport rate base. While KIUC has stated that the Rockport Agreement is a cost-

based tariff, it has not shown that the Rockport Agreement would recognize the effect of

the Section 199 deduction. Consequently, the rate of return applied to the Rockport

rate base should not be adjusted to reflect the Section 199 deduction.

Surcharge Formulas

The inclusion of the 2005 Plan into Kentucky Power's existing surcharge

mechanism will not result in changes to the surcharge formulas. However, the

description of the items included in the components of the formulas will change. The

Commission finds that the formulas used to determine the ES revenue requirement as

proposed by Kentucky Power<sup>57</sup> should be approved, subject to the exclusion of SO<sub>3</sub>

mitigation projects discussed previously in this Order.

Reporting Formats

The inclusion of the 2005 Plan into the existing surcharge mechanism will require

modifications to the monthly environmental surcharge reporting formats. Kentucky

-27-

<sup>57</sup> Application, Exhibit 3.

Case No. 2005-00068

KPSC Case No. 2006-00128 Commission Staff First Set of Data Request Order Dated April 25, 2006 Supplemental Response, Item No. 1 Page 6 of 35

Power provided revised formats in response to a data request.<sup>58</sup> The Commission finds that Kentucky Power's revised monthly environmental surcharge reporting formats should be approved, subject to the exclusion of the SO<sub>3</sub> mitigation projects discussed previously in this Order.

# SURCHARGE ALLOCATION

No party to this case proposed to change the allocation of the environmental surcharge, which is now based on total revenues. This allocation was found to be reasonable by the Commission in Case No. 2002-00169 and it should continue to be used for Kentucky Power's environmental surcharge.

# TARIFF EFFECTIVE DATE

Kentucky Power proposed that its amended E.S. tariff should become effective for bills rendered on and after April 29, 2005. As noted previously in this Order, the Commission's March 21, 2005 Order rejected this effective date, as KRS 278.183(2) provides that the Commission has 6 months to review and approve environmental surcharge compliance plans and surcharge mechanisms. The Commission finds that the E.S. tariff, as discussed and modified in this Order, should become effective for service rendered on and after the date of this Order. The Commission will not make the revised E.S. tariff effective for bills rendered on and after the date of this Order because doing so would result in retroactive rate-making by requiring customers to pay for increases in environmental costs prior to the approval of those increases.

Case No. 2005-00068

<sup>&</sup>lt;sup>58</sup> Response to the Commission Staff's Second Data Request dated April 18, 2005, Item 12.

- 8. Kentucky Power's August 5, 2005 petition for confidentiality is granted.
- 9. Within 10 days of the date of this Order, Kentucky Power shall file with the Commission revised tariff sheets setting out the E.S. tariff as modified and approved herein.

Done at Frankfort, Kentucky, this 7<sup>th</sup> day of September, 2005.

By the Commission

ATTEST:

**Executive Director** 

KPSC Case No. 2006-00128 Commission Staff First Set of Data Request Order Dated April 25, 2006 Supplemental Response, Item No. 1 Page 8 of 35

KPSC Case No. 2005-00068 Commission Staff 2<sup>nd</sup> Set Data Request Order Dated April 18, 2005 Item No. 12 Pagé 1 of 28

# Kentucky Power d/b/a American Electric Power

# REQUEST

Assume for purposes of this question that the Commission approves Kentucky Power's amendment to its environmental compliance plan and modification to the surcharge mechanism as proposed. Indicate what schedules Kentucky Power would propose to include with the monthly environmental surcharge filing to document the additional environmental costs it was permitted to recover from ratepayers.

# RESPONSE

Attached is a copy of the Company's proposed revised monthly environmental surcharge schedules. The Company started with the November, 2004 monthly environmental surcharge filing and modified the schedules to include the 2005 Plan's environmental costs.

Schedule ES Form 3.20 was revised to reflect KPCo's environmental costs associated with the Rockport Unit Power low NOx burners investment. Schedule ES Form 3.14 was revised to reflect KPCo's environmental costs associated with the AEP Pool capacity costs. Schedule ES Form 3.14 pages 3 through 11, calculates the environmental costs at each generating plant. Each generating plant's total monthly amount is also placed on ES Form 3.14 page 1 to calculate the total monthly AEP Pool environmental costs. Schedule ES Form 3.14 page 2, is used to calculate the monthly working capital associated with the AEP Pool environmental costs. Schedule ES Form 3.13 was revised to include the 2005 Plan's costs. Schedule ES Form 3.10 lines 7 and 16 were revised to include the 2005 Plan's costs. Schedule ES Form 2.11 was revised to include the Rockport Unit No 1's original burners net investment at December, 1990. Schedule ES Form 2.00 line 2 includes the new amount from Schedule ES Form 2.11. Schedule ES Form 1.00 includes both the environmental costs from the original November, 2004 monthly filing and the environmental costs associated with the 2005 Plan. The net change from the original November, 2004 monthly filing and the revised November, 2004 monthly filing, which includes the environmental costs associated with the 2005 Plan, was an increase on line 8 of Schedule ES Form 1.00 of \$152,003 (1,868,774 - \$1,716,771).

The above results reflect the adjustment to the Gavin SCR Catalyst Replacement discussed by the Company in its response to the Commission Staff Second Set Item No. 5 of \$1,147,000.

WITNESS: Errol K Wagner

#### KENTUCKY POWER COMPANY - ENVIRONMENTAL SURCHARGE REPORT CURRENT PERIOD REVENUE REQUIREMENT COSTS ASSOCIATED WITH ROCKPORT PLANT

For the Expense Month of November 2004

LINE NO.	COST COMPONENT (2)	(3)	Rockport Plant Common (4)	Unit No. 1 (5)	Unit No. 2 (6)	Total Units 1 & 2 (7)	Total (8)
1 2 3 4 5 6 7 8 9 10	Return on Rate Base : Rockport Plant Continuous Environmental Monitoring System (CEMS) Installed Cost AEGCo Low NOx Burners (LNB) Installed Cost Less Accumulated Depreciation Less Accum. Def. Income Taxes Total Rate Base Weighted Average Cost of Capital - ES FORM 3.21 Monthly Weighted Avg. Cost of Capital (LINE 6 / 12) Monthly Return of Rate Base (Line 5 * Line 7) Operating Expenses : Monthly Depreciation Expense Monthly Indiana Air Emissions Fee Total Operating Expenses (Line 9 + Line 10)	12.1900%	\$1,380,823 (\$459,658) (\$107,122) \$814,043 1.0158% \$8,269 \$4,051 \$12,500 \$16,551	\$8,234,000 (\$289,836) (\$1,262,907) \$6,681,257 \$24,153 \$0	\$8,304,000 (\$240,261) (\$1,437,158) \$6,626,581 \$34,323 \$0		
13	Total Revenue Requirement, Cost Associated with Rockport Plant CEMS and LNB (Line 8 Line 11) Kentucky Power Portion of Rockport's CEMS (Line 12 * 15%) Kentucky Power Portion of Rockport's LNB (Line 12 * 30%)  Total Kentucky Power Portion of Rockports Plants's Total Revenue Requirement (Column 4, Line 13 + Column 7, Line 14)  Note: Cost in Column 8, Line 15 is to be Recorded on ES FORM 3.00, Line 2.		\$24,820 \$3,723			\$193,657 \$58,097	\$61,820

With each monthly filing, attach a schedule similar to Exhibit EKW-2, page 11 of 11 (Wagner Direct Testimony in Case No. 96-489), showing the calculation of the Weighted Average Cost of Capital. These calculations should reflect the provisions of the Rockport Unit Power Agreement, and be as of the Current Expense Month.

KPSC Case No. 2005-00068 2nd Set Data Requests Order Dated April 18, 2005 Item No. 12 Page 26 of 28



A unit of American Electric Power

Kentucky Power P 0 Box 5190 101A Enterprise Drive Frankfort, KY 40602 KentuckyPower.com

September 16, 2005

Elizabeth O'Donnell, Executive Director Public Service Commission P. O. Box 615 211 Sower Boulevard Frankfort, Kentucky 40602

RECEIVED

SEP 1 9 2005

PUBLIC SERVICE

Attention: Isaac S. Scott

RE: Monthly Environmental Surcharge Report

"Harly we

Dear Ms. O'Donnell

Pursuant to KRS 278.183(3), Kentucky Power Company (Kentucky Power) files the original and three copies of its Environmental Surcharge Report for the month of August 2005. In accordance with the Commission's Orders in the Environmental Surcharge cases, Kentucky Power has included the calculation and supporting documentation of the Environmental Surcharge Factor that will be billed for service on and after September 28, 2005.

Per order Case No. 2005-00068 dated September 7, 2005, two Environmental Surcharge Reports are being filed. One report is calculated based on Case No. 2002-00169 Environmental Surcharge Report forms for billing dates beginning September 28 thru October 5, 2005 or 8 billing days. The second report is calculated based on Case No. 2005-00068 Environmental Surcharge Report forms for billing dates beginning October 6 thru October 26, 2005 or 21 billing days.

Sincerely,

Errol K. Wagner

Director Regulatory Services

Enclosures

**ES FORM 3.20** 

# KENTUCKY POWER COMPANY - ENVIRONMENTAL SURCHARGE REPORT CURRENT PERIOD REVENUE REQUIREMENT COSTS ASSOCIATED WITH ROCKPORT

For the Expense Month of August 2005

LINE NO.	COST COMPONENT		
	Return on Rate Base :	\$1,380,823	
1 1	Utility Plant at Original Cost	1	
2	Less Accumulated Depreciation	(\$496,117)	
3	Less Accum. Def. Income Taxes	(\$110,528)	Φ774 170
4	Total Rate Base	11 700 40/	\$774,178
5	Weighted Average Cost of Capital - ES FORM 3.21	11.7694%	0.00000
6	Monthly Weighted Avg. Cost of Capital (LINE 5/12)	200225	0.9808%
7	Monthly Return of Rate Base (4 * 6)		\$7,593
1	Operating Expenses:		04.054
8	Monthly Depreciation Expense		\$4,051
9	Monthly Indiana Air Emissions Fee		<u>\$12,500</u>
10	Total Operating Expenses (8 + 9)		<u>\$16,551</u>
11	Total Revenue Requirement, Cost Associated with		
7	Rockport (7) + (10)		\$24,144
ļ			
12	Kentucky Power Portion of Rockport Total		
	Revenue Requirement. Record on ES FORM 3.00, Line 2		
1	(11 * 15%)		\$3,622
1			



Kentucky Power P 0 Box 5190 101A Enterprise Drive Frankfort, KY 40602 Kentucky Power.com

October 17, 2005

Elizabeth O'Donnell, Executive Director Public Service Commission P. O. Box 615 211 Sower Boulevard Frankfort, Kentucky 40602

RECEIVED

OCT 1 7 2005

PUBLIC SERVICE

Attention: Isaac S. Scott

RE: Monthly Environmental Surcharge Report

Dear Ms. O'Donnell

Pursuant to KRS 278.183(3), Kentucky Power Company (Kentucky Power) files the original and three copies of its Environmental Surcharge Report for the month of September 2005. In accordance with the Commission's Orders in the Environmental Surcharge cases, Kentucky Power has included the calculation and supporting documentation of the Environmental Surcharge Factor that will be billed for service on and after October 27, 2005.

Sincerely,

Errol K. Wagner

Director Regulatory Services

**Enclosures** 

ES FORM 3.20

# KENTUCKY POWER COMPANY - ENVIRONMENTAL SURCHARGE REPORT CURRENT PERIOD REVENUE REQUIREMENT COSTS ASSOCIATED WITH ROCKPORT

For the Expense Month of September 2005

LINE NO.	COST COMPONENT		
	Return on Rate Base :		
1	Utility Plant at Original Cost	\$1,380,823	
2	Less Accumulated Depreciation	(\$500,168)	
3	Less Accum. Def. Income Taxes	(\$110,907)	
4	Total Rate Base		\$769,748
5	Weighted Average Cost of Capital - ES FORM 3.21	11.7758%	
6	Monthly Weighted Avg. Cost of Capital (LINE 5/12)		0.9813%
7	Monthly Return of Rate Base (4 * 6)		\$7,554
ľ	Operating Expenses :		
8	Monthly Depreciation Expense		\$4,051
9	Monthly Indiana Air Emissions Fee		<u>\$12,500</u>
10	Total Operating Expenses (8 + 9)		<u>\$16,551</u>
11	Total Revenue Requirement, Cost Associated with		
	Rockport (7) + (10)		\$24,105
)			
12	Kentucky Power Portion of Rockport Total		
1	Revenue Requirement. Record on ES FORM 3.00, Line 2		
1	(11 * 15%)		\$3,616
	,		



Kentucky Power P 0 Box 5190 101A Enterprise Drive Frankfort, KY 40602 Kentucky Power.com

November 18, 2005

Elizabeth O'Donnell, Executive Director Public Service Commission P. O. Box 615 211 Sower Boulevard Frankfort, Kentucky 40602 RECEIVED

NOV 1 8 2005

PUBLIC SERVICE

Attention: Isaac S. Scott

RE: Monthly Environmental Surcharge Report

Dear Ms. O'Donnell

Pursuant to KRS 278.183(3), Kentucky Power Company (Kentucky Power) files the original and three copies of its Environmental Surcharge Report for the month of October 2005. In accordance with the Commission's Orders in the Environmental Surcharge cases, Kentucky Power has included the calculation and supporting documentation of the Environmental Surcharge Factor that will be billed for service on and after November 18, 2005.

Also, attached is a worksheet for ES FORM 3.30 that calculates the amount to be recovered in the month of October 2005 from the expense month August 2005. There were two billing periods for the expense month August 2005 due to Case No. 2005-00068. The first eight days, billed for service on September 28 through October 5, was billed based on Case No. 2002-00169 using a factor of 5.2286%. The next twenty-one days, billed for service on October 6 through October 26, was billed based on Case No. 2005-00068 using a factor of 5.6602%. Based on this calculation, \$1,692,198 was to be recovered in October 2005.

Sincerely,

Errol K. Wagner

Director Regulatory Services

Enclosures

**ES FORM 3.20** 



# KENTUCKY POWER COMPANY - ENVIRONMENTAL SURCHARGE REPORT CURRENT PERIOD REVENUE REQUIREMENT COSTS ASSOCIATED WITH ROCKPORT

For the Expense Month of October 2005

LINE NO.	COST COMPONENT		
	Return on Rate Base :		
1		1,380,823	
2		\$504,219)	
3	· · · · · · · · · · · · · · · · · · ·	\$111,285)	
4	Total Rate Base		\$765,319
5	•	12.0646%	
6	Monthly Weighted Avg. Cost of Capital (LINE 5/12)		1.0054%
7	Monthly Return of Rate Base (4 * 6)		\$7,694
	Operating Expenses :		
8	Monthly Depreciation Expense		\$4,051
9	Monthly Indiana Air Emissions Fee		<b>\$12,500</b>
10	Total Operating Expenses (8 + 9)		<b>\$16,551</b>
11	Total Revenue Requirement, Cost Associated with		
	Rockport (7) + (10)		\$24,245
12	Kentucky Power Portion of Rockport Total		
	Revenue Requirement. Record on ES FORM 3.00, Line 2		
	(11 * 15%)		\$3,637
}			



Kentucky Power

P 0 Box 5190 101A Enterprise Drive Frankfort, KY 40602 KentuckyPower.com

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DEC 2 0 2005

PUBLIC SERVICE COMMISSIEN

December 20, 2005

Elizabeth O'Donnell, Executive Director Public Service Commission P.O. Box 615 211 Sower Boulevard Frankfort, Kentucky 40602

Attention: Isaac S. Scott

RE: Monthly Environmental Surcharge Report

Dear Ms. O'Donnell

Pursuant to KRS 278.183(3), Kentucky Power Company (Kentucky Power) files the original and three copies of its Environmental Surcharge Report for the month of November 2005. In accordance with the Commission's Orders in the Environmental Surcharge cases, Kentucky Power has included the calculation and supporting documentation of the Environmental Surcharge Factor that will be billed for service on and after December 20, 2005.

Sincerely,

K Magnell Errol K. Wagner

Director Regulatory Services

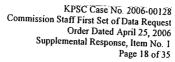
Enclosures

**ES FORM 3.20** 

# KENTUCKY POWER COMPANY - ENVIRONMENTAL SURCHARGE REPORT CURRENT PERIOD REVENUE REQUIREMENT COSTS ASSOCIATED WITH ROCKPORT

For the Expense Month of November 2005

LINE	COST COMPONENT		
NO.	COST COMPONENT		
	Return on Rate Base :		
1 1	Utility Plant at Original Cost	\$1,380,823	
2	Less Accumulated Depreciation	(\$508,270)	
3	Less Accum. Def. Income Taxes	(\$111,663)	
4	Total Rate Base	(,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	\$760,890
5	Weighted Average Cost of Capital - ES FORM 3.21	12.8816%	<b>,</b> ,
6	Monthly Weighted Avg. Cost of Capital (LINE 5/12)		1.0735%
7	Monthly Return of Rate Base (4 * 6)		\$8,168
) '	Operating Expenses :		40,.00
8	Monthly Depreciation Expense		\$4,051
9	Monthly Indiana Air Emissions Fee		\$12,500
10	To the second		\$16,551
10	Total Operating Expenses (8 + 9)		<u>\$10,331</u>
1			
4.4	T L. I D D		
11	Total Revenue Requirement, Cost Associated with		604.740
	Rockport (7) + (10)		\$24,719
12	Kentucky Power Portion of Rockport Total		
	Revenue Requirement. Record on ES FORM 3.00, Line 2		
	(11 * 15%)		\$3,708
<u> </u>			





Kentucky Power P O Box 5190

101A Enterprise Drive Frankfort, KY 40602 KentuckyPower.com

January 20, 2006

Elizabeth O'Donnell, Executive Director Public Service Commission P. O. Box 615 211 Sower Boulevard Frankfort, Kentucky 40602

RECEIVED

JAN 2 0 2006

PUBLIC SERVICE GEMMISSIEN

Attention: Isaac S. Scott

RE: Monthly Environmental Surcharge Report

Dear Ms. O'Donnell

Pursuant to KRS 278.183(3), Kentucky Power Company (Kentucky Power) files the original and three copies of its Environmental Surcharge Report for the month of December 2005. In accordance with the Commission's Orders in the Environmental Surcharge cases, Kentucky Power has included the calculation and supporting documentation of the Environmental Surcharge Factor that will be billed for service on and after January 31, 2006.

'byww

Sincerely,

Errol K. Wagner

Director Regulatory Services

**Enclosures** 

**ES FORM 3.20** 

# KENTUCKY POWER COMPANY - ENVIRONMENTAL SURCHARGE REPORT CURRENT PERIOD REVENUE REQUIREMENT COSTS ASSOCIATED WITH ROCKPORT

For the Expense Month of December 2005

LINE NO.	COST COMPONENT		
	Return on Rate Base :		
1 1	Utility Plant at Original Cost	\$1,380,823	
2	Less Accumulated Depreciation	(\$512,321)	
3	Less Accum. Def. Income Taxes	(\$112,041)	
4	Total Rate Base		\$756,461
5	Weighted Average Cost of Capital - ES FORM 3.21	12.8913%	
6	Monthly Weighted Avg. Cost of Capital (LINE 5/12)		1.0743%
7	Monthly Return of Rate Base (4 * 6)		\$8,126
	Operating Expenses :		
8	Monthly Depreciation Expense		\$4,051
9	Monthly Indiana Air Emissions Fee		\$12,500
10	Total Operating Expenses (8 + 9)		\$16,55 <u>1</u>
	, , , ,		
11	Total Revenue Requirement, Cost Associated with		
	Rockport (7) + (10)		\$24,677
12	Kentucky Power Portion of Rockport Total		
12	Revenue Requirement. Record on ES FORM 3.00, Line 2		
	(11 * 15%)		\$3,702
			<i>42,.02</i>

**ES FORM 3.20** 

#### KENTUCKY POWER COMPANY - ENVIRONMENTAL SURCHARGE REPORT CURRENT PERIOD REVENUE REQUIREMENT COSTS ASSOCIATED WITH ROCKPORT

For the Expense Month of August 2005

LINE			Rockport Plant	Unit	Unit	Total Units	
LINE NO.	COST COMPONENT		Common	No. 1	No. 2	1 & 2	Total
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)
1 2 3 4 5 6 7 8 9 10	Return on Rate Base: Rockport Plant Continuous Environmental Monitoring System (CEMS) Utility Plant at Original Cost AEGCo Low NOx Burners (LNB) Installed Cost Less Accumulated Depreciation Less Accum. Def. Income Taxes Total Rate Base Weighted Average Cost of Capital - ES FORM 3.21 Monthly Weighted Avg. Cost of Capital (LINE 6 / 12) Monthly Return of Rate Base (Line 5 * Line 7) Operating Expenses: Monthly Depreciation Expense Monthly Indiana Air Emissions Fee Total Operating Expenses (Line 9 + Line 10))  Total Revenue Requirement, Cost Associated with Rockport Plant CEMS and LNB (Line 8 + Line 11)	11.7694%	\$1,380,823 (\$496,117) (\$110,528) \$774,178 0.9808% \$7,593 \$4,051 \$12,500 \$16,551	\$5,272,657 (\$322,079)	\$8,355,717 (\$390,284) (\$934,275) \$7,031,158 \$24,510 \$0	\$11,373,555 0.9808% \$111,552 \$39,976 \$0 \$39,976	
1	Kentucky Power's Portion of Rockport's CEMS (Line 12 * 15%)		\$3,622		ſ		
	Kentucky Power's Portion of AEGCo's LNB (Line 12 * 30%) Kentucky Power's Portion of Rockport Plants' Total Revenue Requirement. (Column 4, Line 13 + Column 7, Line 14) Note: Cost in Column 8, Line 15 is to be Recorded on					\$45,458	
15	ES FORM 3.00 Line 2						\$49,080

**ES FORM 3.20** 

#### KENTUCKY POWER COMPANY - ENVIRONMENTAL SURCHARGE REPORT CURRENT PERIOD REVENUE REQUIREMENT COSTS ASSOCIATED WITH ROCKPORT

For the Expense Month of September 2005

LINE			Rockport Plant	Unit	Unit	Total Units	
NO.	COST COMPONENT		Common	No. 1	No. 2	1 & 2	Total
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)
	Return on Rate Base ;						
	Rockport Plant Continuous Environmental Monitoring System (CEMS)						
1	Utility Plant at Original Cost		\$1,380,823	ne 070 057	60 255 747		
	AEGCo Low NOx Burners (LNB) Installed Cost		(0500 400)	\$5,272,657	\$8,355,717		
3	Less Accumulated Depreciation		(\$500,168)	(\$337,545)	, ,		
4	Less Accum. Def. Income Taxes		(\$110,907)		(\$937,891) \$7,003,032	\$11,327,978	
5	Total Rate Base	44 77500/	\$769,748	\$4,324,946	\$7,003,032	\$11,527,510	
1	Weighted Average Cost of Capital - ES FORM 3.21	11.7758%	0.9813%			0.9813%	
	Monthly Weighted Avg. Cost of Capital (LINE 6 / 12)		\$7,554			\$111,161	
8	Monthly Return of Rate Base (Line 5 * Line 7)		\$7,554			\$111,101	
	Operating Expenses :		\$4,051	\$15,466	\$24,510	\$39,976	
	Monthly Depreciation Expense		\$4,051 \$12,500	\$15,466	\$24,510	\$0	
	Monthly Indiana Air Emissions Fee		\$12,500 \$16,551	φ0	ΨΟ	\$39,976	
11	Total Operating Expenses (Line 9 + Line 10))		क्राव,व्या			409,810	
1	Total Revenue Requirement, Cost Associated with Rockport Plant						
12	CEMS and LNB (Line 8 + Line 11)		\$24,105			\$151,137	
	Kentucky Power's Portion of Rockport's CEMS (Line 12 * 15%)		\$3,616				
	Kentucky Power's Portion of AEGCo's LNB (Line 12 * 30%)					\$45,341	
	Kentucky Power's Portion of Rockport Plants'						
l	Total Revenue Requirement. (Column 4, Line 13 + Column 7, Line 14)						
1	Note: Cost in Column 8. Line 15 is to be Recorded on						
15	ES FORM 3.00 Line 2						\$48,957
1							

**ES FORM 3.20** 

#### KENTUCKY POWER COMPANY - ENVIRONMENTAL SURCHARGE REPORT CURRENT PERIOD REVENUE REQUIREMENT COSTS ASSOCIATED WITH ROCKPORT

For the Expense Month of October 2005

LINE			Rockport Plant	Unit	Unit	Total Units 1 & 2	Total
NO.	COST COMPONENT		Common	No. 1	No. 2		I
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)
3 4 5 6 7 8	Return on Rate Base: Rockport Plant Continuous Environmental Monitoring System (CEMS) Utility Plant at Original Cost AEGCo Low NOx Burners (LNB) Installed Cost Less Accumulated Depreciation Less Accum, Def. Income Taxes Total Rate Base Weighted Average Cost of Capital - ES FORM 3.21 Monthly Weighted Avg. Cost of Capital (LINE 6 / 12) Monthly Return of Rate Base (Line 5 * Line 7) Operating Expenses: Monthly Depreciation Expense Monthly Indiana Air Emissions Fee Total Operating Expenses (Line 9 + Line 10))	12.0646%	\$1,380,823 (\$504,219) (\$111,285) \$765,319 1.0054% \$7,695 \$4,051 \$12,500 \$16,551			\$11,282,403 1,0054% \$113,433 \$39,976 \$0 \$39,976	
13 14	Total Revenue Requirement, Cost Associated with Rockport Plant CEMS and LNB (Line 8 + Line 11) Kentucky Power's Portion of Rockport's CEMS (Line 12 * 15%) Kentucky Power's Portion of AEGCo's LNB (Line 12 * 30%) Kentucky Power's Portion of Rockport Plants' Total Revenue Requirement. (Column 4, Line 13 + Column 7, Line 14) Note: Cost in Column 8, Line 15 is to be Recorded on ES FORM 3.00 Line 2		\$24,246 \$3,637			\$153,409 <b>\$46,023</b>	\$49,660

**ES FORM 3.20** 

#### KENTUCKY POWER COMPANY - ENVIRONMENTAL SURCHARGE REPORT CURRENT PERIOD REVENUE REQUIREMENT COSTS ASSOCIATED WITH ROCKPORT

For the Expense Month of November 2005

LINE NO.	COST COMPONENT	(3)	Rockport Plant Common (4)	Unit No. 1 (5)	Unit No. 2 (6)	Total Units 1 & 2 (7)	Total (8)
(1)	(2)	(3)	(4)	(3)	(0)		
3	Return on Rate Base : Rockport Plant Continuous Environmental Monitoring System (CEMS) Utility Plant at Original Cost AEGCo Low NOx Burners (LNB) Installed Cost Less Accumulated Depreciation Less Accum. Def. Income Taxes		\$1,380,823 (\$508,270) (\$111,663)	\$5,272,657 (\$368,477) (\$614,135)	\$8,355,717 (\$463,814) (\$945,122)		
5	Total Rate Base		\$760,890	\$4,290,045	\$6,946,781	\$11,236,826	
	Weighted Average Cost of Capital - ES FORM 3.21	12.8816%	V. 55,	<b>,</b> ,, <b>-</b> , , , , , , , , , , , , , , , , , , ,	, , ,		
7	Monthly Weighted Avg. Cost of Capital (LINE 6 / 12)		1.0735%			1.0735%	
8	Monthly Return of Rate Base (Line 5 * Line 7)		\$8,168			\$120,627	
1	Operating Expenses :						
9	Monthly Depreciation Expense		\$4,051	\$15,466	\$24,510	\$39,976	
	Monthly Indiana Air Emissions Fee		\$12,500	\$0	\$0	\$0	
11	Total Operating Expenses (Line 9 + Line 10))		\$16,551			\$39,976	
	Total Revenue Requirement, Cost Associated with Rockport Plant CEMS and LNB (Line 8 + Line 11)		\$24,719			\$160,603	
	Kentucky Power's Portion of Rockport's CEMS (Line 12 * 15%)		\$3,708			\$48,181	
14	Kentucky Power's Portion of AEGCo's LNB (Line 12 * 30%) Kentucky Power's Portion of Rockport Plants'					440,101	
1	Total Revenue Requirement. (Column 4, Line 13 + Column 7, Line 14)						
	Note: Cost in Column 8, Line 15 is to be Recorded on						
15	ES FORM 3.00 Line 2						\$51,889
1							

**ES FORM 3.20** 

#### KENTUCKY POWER COMPANY - ENVIRONMENTAL SURCHARGE REPORT CURRENT PERIOD REVENUE REQUIREMENT COSTS ASSOCIATED WITH ROCKPORT

For the Expense Month of December 2005

LINE NO.	COST COMPONENT		Rockport Plant Common	Unit No. 1	Unit No. 2	Total Units 1 & 2	Total
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)
1 2 3 4 5 6 7 8	Return on Rate Base: Rockport Plant Continuous Environmental Monitoring System (CEMS) Utility Plant at Original Cost AEGCo Low NOx Burners (LNB) Installed Cost Less Accumulated Depreciation Less Accum. Def. Income Taxes Total Rate Base Weighted Average Cost of Capital - ES FORM 3.21 Monthly Weighted Avg. Cost of Capital (LINE 6 / 12) Monthly Return of Rate Base (Line 5 * Line 7) Operating Expenses: Monthly Depreciation Expense Monthly Indiana Air Emissions Fee Total Operating Expenses (Line 9 + Line 10))	12.8913%	\$1,380,823 (\$512,321) (\$112,041) \$756,461 1.0743% \$8,127 \$4,051 \$12,500 \$16,551		\$8,355,717 (\$488,324) (\$948,738) \$6,918,655 \$24,510 \$0	\$11,191,250 1.0743% \$120,228 \$39,976 \$0 \$39,976	
12 13	Total Revenue Requirement, Cost Associated with Rockport Plant CEMS and LNB (Line 8 + Line 11) Kentucky Power's Portion of Rockport's CEMS (Line 12 * 15%)		\$24,678 <b>\$3,702</b>			\$160,204	
	Kentucky Power's Portion of RegCo's LNB (Line 12 * 30%) Kentucky Power's Portion of Rockport Plants' Total Revenue Requirement. (Column 4, Line 13 + Column 7, Line 14)		V3,7.			\$48,061	
15	Note: Cost in Column 8, Line 15 is to be Recorded on ES FORM 3.00 Line 2						\$51,763

ES FORM 3.14 Page 2 of 11

Indiana

#### KENTUCKY POWER COMPANY - ENVIRONMENTAL SURCHARGE REPORT CURRENT PERIOD REVENUE REQUIREMENT AEP POOL MONTHLY ENVIRONMENTAL CAPACITY COSTS WORKING CAPTIAL ONLY

# For the Expense Month of December 2005

Line No.	Cost Component	Ohio Power Company's (OPCo) Environmental Cost to KPCo	Indiana Michigan Power Company's (I&M) Environmental Cost to KPCo	Total
(1)	(2)	(3)	(4)	(5)
1	Amos Unit No. 3 Environmental Cost to Kentucky Power (ES FORM 3.14, Page 3 of 11, Line 14)	\$8,210		
2	Cardinal Unit No. 1 Environmental Cost to Kentucky Power (ES FORM 3.14, Page 4 of 11, Line 10)	\$2,912		
3	Gavin Plant Environmental Cost to Kentucky Power (ES FORM 3.14, Page 5 of 11, Line 15)	\$8,507,858		
4	Kammer Plant Environmental Cost to Kentucky Power (ES FORM 3.14, Page 6 of 11, Line 10)	\$17,113		
5	Mitchell Plant Environmental Cost to Kentucky Power (ES FORM 3.14, Page 7 of 11, Line 10)	\$21,712		
6	Muskingum Plant Environmental Cost to Kentucky Power (ES FORM 3.14, Page 8 of 11, Line 10)	\$27,696		
7	Sporn Plant Environmental Cost to Kentucky Power (ES FORM 3.14, Page 9 of 11, Line 10)	\$13,484		
8	Rockport Plant Environmental to Kentucky Power (ES FORM 3.14, Page 10 of 11, Column 3, Line 10)		\$5,313	
9	Rockport Plant Environmental to Kentucky Power (ES FORM 3.14, Page 9 of 10, Column 4, Line 10)		\$4,063	
10	Tanners Creek Plant Environmental Cost to Kentucky Power (ES FORM 3.14, Page 11 of 11, Line 10)		\$12,500	
11	Subtotal	\$8,598,985	\$21,876	
12	Steam Capacity By Company - OPCo (Column 3) / I&M (Column 4) (kw)	8,472,000	5,089,000	
13	Environmental Base (\$/kw)	\$1.01	\$0.00	
14	Company Surplus Weighting	77.00%	23.00%	
15	Portion of Weighted Average Capacity Rate Attributed to Environmental Fixed O&M Costs	\$0.78	\$0.00	
16	Kentucky Power Capacity Deficit (kw)	352,600	352,600	
17	Fixed O&M Environmental Cost to Kentucky Power	\$275,028	\$0	\$275,028

Note: Cost in Column 5, Line 17 is to be recorded on ES FORM 3.13, Line 2.



ES FORM 3.14 Page 3 of 11

# KENTUCKY POWER COMPANY - ENVIRONMENTAL SURCHARGE REPORT CURRENT PERIOD REVENUE REQUIREMENT OHIO POWER COMPANY (OPCo) - AMOS PLANT UNIT NO. 3

TIME		REVISED	FILED	
LINE NO.	COST	AMOUNTS	AMOUNTS	DIFFERENCE
140.	0031			
	1 Hilly - Palent of Original Const	\$89,749,584	\$89.749.584	
1	Utility Plant at Original Cost	1.37%	1.37%	
2	Member Primary Capacity Investment Rate (16.44% / 12)	\$1,229,569	\$1,229,569	
3	Total Rate Base	100.00%	100.00%	
4	Ohio Power Company's Percentage Ownership - Environmental Investment	\$1,229,569	\$1,229,569	
5	OPCo's Share of Cost Associated with Amos Unit No. 3 (11) X (12)	Ψ1,220,000	ψ1,225,000	
١. ا	Operations:	\$6,456	\$6,456	
6	Urea (5020002)	\$0,400	\$0	
7	Trona (5020003)	\$5,859	\$5,859	
1 -	Air Emission Fee	\$12,315	\$12,315	
9	Total Operations (4) + (5) + (6)	<b>\$12,010</b>	412,510	
	Maintenance:	\$0	\$0	
10	SCR Maintenance (5120000)	\$0	\$0	
11	1/2 of Maintenance (7) * 50%	\$12,315	\$12,315	
12	Fixed O&M (9) + (11)	66.67%	66.67%	
13	Ohio Power Company's Percentage Ownership - O&M Cost	\$8,210	\$8,210	1
14	OPCo's Share of O&M Cost Associated with Amos Unit No. 3 (12) X (13)	\$0,210	<u>\$0,210</u>	ł
	Total Revenue Requirement,	\$1,237,779	\$1,237,779	
15	Cost Associated with Amos Unit No. 3 (5) + (14)	8,472,000	8,472,000	}
16	Ohio Power Company Steam Capacity (kw)	\$0.15	\$0.15	l
17	Amos Unit No. 3 Environmental Rate (\$/kw)	77.00%		ł
18	Ohio Power Surplus Weighing	17.00%	7 5.00 %	Ì
19	Portion of Weighted Average Capacity Rate	\$0.12	\$0.11	ł
1	Attributed to Amos Unit No. 3 SCR (\$/kw) (17) * (18)	Ψ0.12	Ψ0.1 ;	
	Amos Unit No. 3 Costs to Kentucky Power :	\$0.12	\$D.11	l
20	Amos Unit No. 3 Portion (\$/kw) (19)	352,600	352,600	1
21	Kentucky Power Capacity Deficit (kw)	332,000	352,000	ł
1	Amos Unit No. 3 Environmental Cost to Kentucky Power (20) * (21)	\$42,312	\$38,786	\$3,526
22	(ES FORM 3.14, Page 1 of 10, Line 1)	φ42,312	φ50,760	1
<u></u>			L	

ES FORM 3.14 Page 4 of 11

# KENTUCKY POWER COMPANY - ENVIRONMENTAL SURCHARGE REPORT CURRENT PERIOD REVENUE REQUIREMENT OHIO POWER COMPANY (OPCo) - CARDINAL UNIT 1

LINE		REVISED AMOUNTS	FILED AMOUNTS	DIFFERENCE
NO.	COST	AMOUNTS	7111001110	DITTERCENCE
1 2 3	Utility Plant at Original Cost Member Primary Capacity Investment Rate (16.44% / 12) Total Rate Base	\$97,226,884 <u>1.37%</u> \$1,332,008	\$97,226,884 <u>1.37%</u> \$1,332,008	
4 5 6 7	Operations : Urea (5020002) Trona (5020003) Air Emission Fee Total Operations (4) + (5) + (6)	\$0 \$0 <u>\$2,912</u> \$2,912	\$0 \$0 <u>\$2,912</u> \$2,912	
8 9 10	Maintenance: SCR Maintenance (5120000) 1/2 of Maintenance (8) * 50% Fixed O&M (7) + (9)	\$0 <u>\$0</u> <u>\$2,912</u>	\$0 <u>\$0</u> \$2,912	
11 12 13 14	Total Revenue Requirement, Cost Associated with Cardinal Unit No. 3 (3) + (10) Ohio Power Company's Percentage Ownership OPCo's Share of Cost Associated with Cardinal Unit No. 1 (11) X (12) Ohio Power Company Steam Capacity (kw)	\$1,334,920 100.00% \$1,334,920 8,472,000 \$0.16	\$1,334,920 100.00% \$1,334,920 8,472,000 \$0.16	
15 16 17	Cardinal Unit No. 1 (\$/kw) Ohio Power Surplus Weighing Portion of Weighted Average Capacity Rate Attributed to Cardinal Unit No. 1 (\$/kw) (15) X (16) Cardinal Unit No. 1 Costs to Kentucky Power:	\$0.16 77.00% \$0.12	1	
18 19	Cardinal Unit No. 1 Costs to Kentucky Fower.  Cardinal Unit No. 1 Portion (\$/kw) (17)  Kentucky Power Capacity Deficit (kw)  Cardinal Unit No. 1 Environmental Cost to Kentucky Power (18) * (19)	\$0.12 <u>352,600</u>	\$0.12 <u>352,600</u>	
20	(ES FORM 3.14, Page 1 of 10, Line 2)	\$42,312	\$42,312	\$0

ES FORM 3.14 Page 5 of 11

# KENTUCKY POWER COMPANY - ENVIRONMENTAL SURCHARGE REPORT CURRENT PERIOD REVENUE REQUIREMENT OHIO POWER COMPANY (OPCo) - GAVIN PLANT (UNITS 1 & 2)

LINE		REVISED	FILED	
NO.	cost	AMOUNTS	AMOUNTS	DIFFERENCE
1	Utility Plant at Original Cost	\$247,129,459	\$247,129,459	
2	Member Primary Capacity Investment Rate (16.44% / 12)	<u>1.37%</u>	<u>1.37%</u>	ĺ
3	Total Rate Base	\$3,385,674	\$3,385,674	
	Operations:			
4	Sludge Disposal (5010000)	\$617,284	\$617,284	
5	Lime (5020000)	\$3,100,419	\$3,100,419	
6	Urea (5020002)	\$0	\$0	
7	Trona (5020003)	\$225,451	\$225,451	
В	Air Emission Fee	\$28,432	\$28,432	
9	Lease (5070000)	\$4,245,783	\$4,245,783	
10	Total Operations (4) + (5) + (6) + (7) + (8) + (9)	\$8,217,369	\$8,217,369	
l l	Maintenance:			
11	SCR Maintenance (5120000)	\$18,526	\$18,526	
12	Scrubber Maintenance (5120000)	<u>\$562,451</u>	<u>\$562,451</u>	
13	Total Maintenance (11) + (12)	\$580,977	\$580,977	
14	1/2 of Maintenance (13) <sup>±</sup> 50%	\$290,489	<u>\$290,489</u>	
15	Fixed O&M (10) + (14)	<u>\$8,507,858</u>	<u>\$8,507,858</u>	
i	Total Revenue Requirement,		244 222 522	
16	Cost Associated with Gavin Plant (3) + (15)	\$11,893,532	\$11,893,532	
17	Ohio Power Company's Percentage Ownership	100.00%		
18	OPCo's Share of Cost Associated with Gavin Plant (16) X (17)	\$11,893,532	\$11,893,532	
19	Ohio Power Company Steam Capacity (kw)	8,472,000	8,472,000	
20	Gavin Plant (\$/kw)	\$1.40	\$1.40	
21	Ohio Power Surplus Weighing	77.00%	76.00%	
22	Portion of Weighted Average Capacity Rate		04.00	
	Attributed to Gavin Plant (\$/kw) (20) X (21)	\$1.08	\$1.06	
1	Gavin Plant Costs to Kentucky Power :		04.00	
23	Gavin Plant Portion (\$/kw) (22)	\$1.08	\$1.06	
24	Kentucky Power Capacity Deficit (kw)	<u>352,600</u>	<u>352,600</u>	
	Gavin Plant Environmental Cost to Kentucky Power (23) * (24)		0070 750	<b>67</b> 626
25	(ES FORM 3.14, Page 1 of 10, Line 3)	\$380,808	\$373,756	\$7,052

ES FORM 3.14 Page 6 of 11

# KENTUCKY POWER COMPANY - ENVIRONMENTAL SURCHARGE REPORT CURRENT PERIOD REVENUE REQUIREMENT OHIO POWER COMPANY (OPCo) - KAMMER PLANT (UNITS 1, 2 & 3)

		DEVICES.	רעדה	
LINE		REVISED	FILED AMOUNTS	DIESEDENOE
NO.	COST	AMOUNTS	AMOUNTS	DIFFERENCE
		E7 004 204	67 DG4 3G4	
1	Utility Plant at Original Cost	\$7,064,364	\$7,064,364	
2	Member Primary Capacity Investment Rate (16.44% / 12)	<u>1.37%</u>	1.37%	
3	Total Rate Base	\$96,782	\$96,782	
	Operations:			
4	Urea (5020002)	\$0	\$0	
5	Trona (5020003)	\$0	\$0	
6	Air Emission Fee	<u>\$17,113</u>	<u>\$17,113</u>	
7	Total Operations (4) + (5) + (6)	\$17,113	\$17,113	
i i	Maintenance :			
8	SCR Maintenance (5120000)	\$0	\$0	
9	1/2 of Maintenance (8) * 50%	<u>\$0</u>	<u>\$0</u>	
10	Fixed O&M (7) + (9)	<u>\$17,113</u>	<u>\$17,113</u>	
	Total Revenue Requirement,			
11	Cost Associated with Kammer Plant (3) + (10)	<u>\$113,895</u>	<u>\$113,895</u>	
12	Ohio Power Company's Percentage Ownership	100.00%	100.00%	
13	OPCo's Share of Cost Associated with Kammer Plant (11) X (12)	\$113,895	\$113,895	
14	Ohio Power Company Steam Capacity (kw)	8,472,000	8,472,000	
15	Kammer Plant (\$/kw)	\$0.01	\$D.01	
16	Ohio Power Surplus Weighing	77.00%	76.00%	
17	Portion of Weighted Average Capacity Rate			
	Attributed to Kammer Plant (\$/kw) (15) X (16)	\$0.01	\$0.01	
j	Kammer Plant Costs to Kentucky Power :			
18	Kammer Plant Portion (\$/kw) (17)	\$0.01	\$0.01	
19	Kentucky Power Capacity Deficit (kw)	<u>352,600</u>	<u>352,600</u>	
	Kammer Plant Environmental Cost to Kentucky Power (18) * (19)			
20	(ES FORM 3.14, Page 1 of 10, Line 4)	\$3,526	\$3,526	\$0

ES FORM 3.14 Page 7 of 11

# KENTUCKY POWER COMPANY - ENVIRONMENTAL SURCHARGE REPORT CURRENT PERIOD REVENUE REQUIREMENT OHIO POWER COMPANY (OPCo) - MITCHELL PLANT (UNITS 1 & 2)

LINE		REVISED	FILED	
NO.	COST	AMOUNTS	AMOUNTS	DIFFERENCE
		\$19,443,483	\$19,443,483	
1	Utility Plant at Original Cost		1.37%	
2	Member Primary Capacity Investment Rate (16.44% / 12)	1.37%		
3	Total Rate Base	\$266,376	\$266,376	
	Operations:	20	•••	
4	Urea (5020002)	\$D	\$0 \$0	
5	Trona (5020003)	\$0	\$0 \$24.740	
6	Air Emission Fee	<u>\$21,712</u>	<u>\$21,712</u>	
7	Total Operations (4) + (5) + (6)	\$21,712	\$21,712	
	Maintenance :			
8	SCR Maintenance (5120000)	\$0	\$0	
9	1/2 of Maintenance (8) * 50%	<u>\$0</u>	<u>\$0</u>	
10	Fixed O&M (7) + (9)	<u>\$21,712</u>	<u>\$21,712</u>	
)	Total Revenue Requirement,			
11	Cost Associated with Mitchell Plant (3) + (10)	\$288,088	<u>\$288,088</u>	
12	Ohio Power Company's Percentage Ownership	100.00%	100.00%	
13	OPCo's Share of Cost Associated with Mitchell Plant (11) X (12)	\$288,088	\$288,088	
14	Ohio Power Company Steam Capacity (kw)	8,472,000	8,472,000	
15	Mitchell Plant (\$/kw)	\$0.03	\$0.03	
16	Ohio Power Surplus Weighing	77.00%	76.00%	
17	Portion of Weighted Average Capacity Rate			
}	Attributed to Mitchell Plant (\$/kw) (15) X (16)	\$0.02	\$0.02	
1	Mitchell Plant Costs to Kentucky Power :	l l		
18	Mitchell Plant Portion (\$/kw) (17)	\$0.02	\$0.02	
19	Kentucky Power Capacity Deficit (kw)	<u>352,600</u>	<u>352,600</u>	
	Mitchell Plant Environmental Cost to Kentucky Power (18) * (19)	1		
20	(ES FORM 3.14, Page 1 of 10, Line 5)	\$7,052	\$7,052	\$0
1	, , , , , , , , , , , , , , , , , , , ,			

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# KENTUCKY POWER COMPANY - ENVIRONMENTAL SURCHARGE REPORT CURRENT PERIOD REVENUE REQUIREMENT OHIO POWER COMPANY (OPCo) - MUSKINGUM PLANT (UNITS 1, 2, 3, 4 & 5)

LINE NO.	COST	REVISED AMOUNTS	FILED AMOUNTS	DIFFERENCE
1	Utility Plant at Original Cost	\$16,288,564	\$16,288,564	
2	Member Primary Capacity Investment Rate (16.44% / 12)	1.37%	1.37%	
3	Total Rate Base	\$223,153	\$223,153	
	Operations:			
4	Urea (5020002)	\$0	\$0	
5	Trona (5020003)	\$0	\$0	
6	Air Emission Fee	\$27,696	\$27,696	
7	Total Operations (4) + (5) + (6)	\$27,696	\$27,696	
'	Maintenance:			
8	SCR Maintenance (5120000)	\$D	\$0	
9	1/2 of Maintenance (8) * 50%	<u>\$0</u>	<u>\$0</u>	
10	Fixed O&M (7) + (9)	\$27,696	<u>\$27,696</u>	
	Total Revenue Requirement,			
11	Cost Associated with Muskingum Plant (3) + (10)	\$250,849	<u>\$250,849</u>	
12	Ohio Power Company's Percentage Ownership	100.00%	100.00%	
13	OPCo's Share of Cost Associated with Muskingum Plant (11) X (12)	\$250,849	\$250,849	
14	Ohio Power Company Steam Capacity (kw)	8,472,000	8,472,000	
15	Muskingum Plant (\$/kw)	\$0.03	\$0.03	
16	Ohio Power Surplus Weighing	77.00%	76.00%	
17	Portion of Weighted Average Capacity Rate			
	Attributed to Muskingum Plant (\$/kw) (15) X (16)	\$0.02	\$0.02	
	Muskingum Plant Costs to Kentucky Power :			
18	Muskingum Plant Portion (\$/kw) (17)	\$0.02	\$0.02	
19	Kentucky Power Capacity Deficit (kw)	<u>352,600</u>	<u>352,600</u>	
	Muskingum Plant Environmental Cost to Kentucky Power (18) * (19)			
20	(ES FORM 3.14, Page 1 of 10, Line 6)	\$7,052	\$7,052	\$0

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# KENTUCKY POWER COMPANY - ENVIRONMENTAL SURCHARGE REPORT CURRENT PERIOD REVENUE REQUIREMENT OHIO POWER COMPANY (OPCo) - SPORN PLANT (UNITS 2, 3, 4 & 5)

		REVISED	FILED	
LINE		AMOUNTS	AMOUNTS	DIFFERENCE
NO.	COST	AIVIOUNTS	AMOUNTS	DIFFERENCE
	1 100 to 1 District Control Control	\$15,247,389	\$15,247,389	
1	Utility Plant at Original Cost	\$15,247,303 1.37%	1.37%	
2	Member Primary Capacity Investment Rate (16.44% / 12)	\$208,889	\$208.889	
3	Total Rate Base	\$200,009	\$200,00 <del>9</del>	
	Operations:	\$0	\$0	
4	Urea (5020002)	\$0 \$0	\$0 \$0	
5	Trona (5020003)		7	
6	Air Emission Fee	<u>\$13,484</u>	<u>\$13,484</u>	
7	Total Operations (4) + (5) + (6)	\$13,484	\$13,484	
	Maintenance:		***	
8	SCR Maintenance (5120000)	\$0	\$0	
9	1/2 of Maintenance (8) * 50%	<u>\$0</u>	<u>\$0</u>	
10	Fixed O&M (7) + (9)	<u>\$13,484</u>	<u>\$13,484</u>	
	Total Revenue Requirement,			
11	Cost Associated with Sporn Plant (3) + (10)	<u>\$222,373</u>	<u>\$222,373</u>	
12	Ohio Power Company's Percentage Ownership	100.00%	100.00%	
13	OPCo's Share of Cost Associated with Sporn Plant (11) X (12)	\$222,373	\$222,373	
14	Ohio Power Company Steam Capacity (kw)	8,472,000	8,472,000	
15	Sporn Plant (\$/kw)	\$0.03	\$0.03	
16	Ohio Power Surplus Weighing	77.00%	76.00%	
17	Portion of Weighted Average Capacity Rate			
	Attributed to Sporn Plant (\$/kw) (15) X (16)	\$0.02	\$0.02	
i '	Sporn Plant Costs to Kentucky Power :			
18	SpornGavin Plant Portion (\$/kw) (17)	\$0.02	\$0.02	
19	Kentucky Power Capacity Deficit (kw)	<u>352,600</u>	<u>352,600</u>	
	Sporn Plant Environmental Cost to Kentucky Power (18) * (19)			
20	(ES FORM 3.14, Page 1 of 10, Line 7)	\$7,052	\$7,052	\$0

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#### KENTUCKY POWER COMPANY - ENVIRONMENTAL SURCHARGE REPORT CURRENT PERIOD REVENUE REQUIREMENT INDIANA MICHGAN POWER COMPANY (I&M) - ROCKPORT PLANT (UNITS 1 & 2)

LINE NO.	COST	REVISED UNIT 1 AMOUNTS	REVISED UNIT 2 AMOUNTS	TOTAL	FILED UNIT 1 AMOUNTS	FILED UNIT 2 AMOUNTS	TOTAL	DIFFERENCE
(1)	(2)	(3)	(4)	(5)	(5)	(6)	(7)	(8)
\ \\ \\ \\ \\ \\ \\ \\ \\ \\ \\ \\ \\ \								
1	Utility Plant at Original Cost	\$10,544,676	\$16,714,682		\$10,544,676	\$16,714,682		
2	Member Primary Capacity Investment Rate (16.44% / 12)	<u>1.37%</u>	1.37%		1.37%	1.37%		]
3	Total Rate Base	\$144,462	\$228,991		\$144,462	\$228,991		
	Operations:					40	1	
4	Urea (5020002)	\$0	\$0		\$0	\$0 \$0	l	
5	Trona (5020003)	\$0	\$0 #C 050		\$0 *c 350	\$6,250	l	1
1	Air Emission Fee	\$6,250	\$6,250		<u>\$6,250</u> \$6,250	\$6,250		]
7	Total Operations (4) + (5) + (6)	\$6,250	\$6,250		\$0,200	Ψ0,200		
8	Maintenance ; SCR Maintenance (5120000)	\$0	\$0		\$0	\$0		
9	1/2 of Maintenance (8) * 50%	\$Q	\$ <u>0</u>		\$Q	\$Q		1
	Fixed O&M (7) + (7)	\$6.2 <u>50</u>	\$6,250		\$6,250	\$6,250		
'"	Total Revenue Requirement,		A.CIMA					1
11	Cost Associated with Rockport Plant (7) + (9)	\$150,712	\$235,241		\$150,712	\$235,241		]
12	Indiana Michigan Power Company's Percentage Ownership	85,00%	65,08%		<u>85,00%</u>	<u>65,08%</u>		
13	I&M's Share of Cost Associated with Rockport Plant (11) X (12)	\$128,105	\$153,095		\$128,105	\$153,095		
14	Total Rockport Units 1 & 2			\$281,200			\$281,200	
15	Indiana Michigan Power Company Steam Capacity (kw)			5,089,000			5,089,000	
16	Rockport Plant (\$/kw) (14) / (15)			\$0.06			\$0.06	
1	Kentucky Power Portion of Rockport Plant /			na 000/			24,00%	
17	Indiana Michigan Power Surplus Weighing	(		23.00%			24.00%	1
18	Portion of Weighted Average Capacity Rate	8		\$0.01			\$0.01	
	Attributed to Rockport Plant (\$/kw) (17) X (18) Rockport Plant Costs to Kentucky Power :			φυ.υ ι			Ψ3,01	
19	Rockport Plant Costs to Kentucky Power .  Rockport Plant Portion (\$/kw) (18)			\$0.01			\$0.01	1
20	Kentucky Power Capacity Deficit (kw)			352,600			352,600	
1	Rockport Units 1 & 2 Environmental to Kentucky Power (19) * (20)							
21	(ES FORM 3.14, Page 1 of 10, Line 8)			\$3,526	ł		\$3,526	\$0
						<u></u>		

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# KENTUCKY POWER COMPANY - ENVIRONMENTAL SURCHARGE REPORT CURRENT PERIOD REVENUE REQUIREMENT INDIANA MICHGAN POWER COMPANY (I&M) - TANNERS CREEK (UNITS 1, 2, 3 & 4)

LINE		REVISED	FILED	
NO.	COST	AMOUNTS	AMOUNTS	DIFFERENCE
NO.	0001			
1	Utility Plant at Original Cost	\$15,767,750	\$15,767,750	
2	Member Primary Capacity Investment Rate (16.44% / 12)	<u>1.37%</u>	<u>1.37%</u>	
3	Total Rate Base	\$216,018	\$216,018	
	Operations:			
4	Urea (5020002)	\$0	\$0	
5	Trona (5020003)	\$0	\$D	
6	Air Emission Fee	<u>\$12,500</u>	<u>\$12,500</u>	
7	Total Operations (4) + (5) + (6)	\$12,500	\$12,500	
	Maintenance:			
8	SCR Maintenance (5120000)	\$0	\$0	
9	1/2 of Maintenance (8) * 50%	<u>\$0</u>	<u>\$0</u>	
10	Fixed O&M (7) + (9)	<u>\$12,500</u>	<u>\$12,500</u>	
	Total Revenue Requirement,			
11	Cost Associated with Tanners Creek Plant (3) + (10)	<u>\$228,518</u>	<u>\$228,518</u>	
12	Indiana Michigan Power Company's Percentage Ownership	100.00%	100.00%	
13	I&M's Share of Cost Associated with Tanners Creek Plant (11) X (12)	\$228,518	\$228,518	
14	Indiana Michigan Power Company Steam Capacity (kw)	5,089,000	5,089,000	
15	Tanners Creek Plant (\$/kw)	\$0.04	\$0.04	
16	Indiana Michigan Power Surplus Weighing	23.00%	24.00%	
17	Portion of Weighted Average Capacity Rate			
l	Attributed to Rockport Plant (\$/kw) (15) X (16)	\$0.01	\$0.01	
	Tanners Creek Plant Costs to Kentucky Power :			
18	Tanners Creek Plant Portion (\$/kw) (17)	\$0.01	\$0.01	
19	Kentucky Power Capacity Deficit (kw)	<u>352,600</u>	<u>352,600</u>	
	Tanners Creek Plant Environmental Cost to Kentucky Power (18) * (19)		00 500	40
20	(ES FORM 3.14, Page 1 of 10, Line 9)	\$3,526	\$3,526	\$0
		]		

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#### KENTUCKY POWER COMPANY - ENVIRONMENTAL SURCHARGE REPORT CURRENT PERIOD REVENUE REQUIREMENT AEP POOL MONTHLY ENVIRONMENTAL CAPACITY COSTS

			REVISED AMOUNTS Ohio	REVISED AMOUNTS Indiana Michigan		REVISED AMOUNTS	FILED AMOUNTS Ohio	FILED AMOUNTS Indiana Michigan	FILED AMOUNTS	DIFFERENCE
Line			Power Company's Environmental	Power Company's Environmental			Power Company's Environmental	Power Company's Environmental	Tabl	
No.	Cost Component		Cost to KPCo (3)	Cost to KPCo (4)		Total (5)	Cost to KPCo (6)	Cost to KPCo (7)	Total (8)	(9)
(1)	(2)		(3)	. (4)		(0)	(0)		• *	
1	Amos Unit No. 3 Environmental Cost to Kentucky Power (ES FORM 3.14, Page 3 of 11, Line 22)		\$42,312				\$38,786			
2	Cardinal Unit No. 1 Environmental Cost to Kentucky Power (ES FORM 3.14, Page 4 of 11, Line 20)		\$42,312				\$42,312			
3	Gavin Plant Environmental Cost to Kentucky Power (ES FORM 3.14, Page 5 of 11, Line 25)		\$380,808				\$373,756			
4	Kammer Plant Environmental Cost to Kentucky Power FORM 3.14, Page 6 of 11, Line 20)	(ES	\$3,526				\$3,526			
5	Mitchell Plant Environmental Cost to Kentucky Power (ES FORM 3.14, Page 7 of 11, Line 20)		\$7,052				\$7,052			
6	Muskingum Plant Environmental Cost to Kentucky Power (ES FORM 3.14, Page 8 of 11, Line 20)		\$7,052				\$7,052			
7	Sporn Plant Environmental Cost to Kentucky Power (ES FORM 3.14, Page 9 of 11, Line 20)		\$7,052				\$7,052			
8	Rockport Plant Environmental to Kentucky Power (ES FORM 3.14, Page 10 of 11, Column 5, Line 21)			\$3,52	26			\$3,526		
9	Tanners Creek Plant Environmental Cost to Kentucky Power (ES FORM 3.14, Page 11 of 11, Line 20)			\$3,52	26			\$3,526		
10	Total AEP Pool Monthly Environmental Capacity Costs to Kentucky Power		\$490,114	\$7,05	52	\$497,166	\$479,536	\$7,052	\$486,588	\$10,578

