

COMMONWEALTH OF KENTUCKY
BEFORE THE
PUBLIC SERVICE COMMISSION OF KENTUCKY

RECEIVED

FEB 20 2012

PUBLIC SERVICE
COMMISSION

IN THE MATTER OF

APPLICATION OF KENTUCKY POWER COMPANY)
FOR APPROVAL OF ITS ENVIRONMENTAL)
SURCHARGE PLAN, APPROVAL OF ITS AMENDED)
ENVIRONMENTAL COST RECOVERY) CASE NO. 2011-00401
SURCHARGE TARIFFS, AND FOR THE GRANT OF)
CERTIFICATES OF PUBLIC CONVENIENCE AND)
NECESSITY FOR THE CONSTRUCTION AND)
ACQUISTION OF RELATED FACILITIES)

RESPONSES OF KENTUCKY POWER COMPANY TO
COMMISSION STAFF'S SECOND SET OF DATA REQUESTS

February 20, 2012

VERIFICATION

The undersigned, KARL R. BLETZACKER, being duly sworn, deposes and says he is Director, Fundamental Analysis for American Electric Power, that he has personal knowledge of the matters set forth in the forgoing responses for which he is the identified witness and that the information contained therein is true and correct to the best of his information, knowledge, and belief.

Karl R Bletzacker

KARL R. BLETZACKER

STATE OF OHIO

)

) CASE NO. 2011-00401

COUNTY OF FRANKLIN

)

Subscribed and sworn to before me, a Notary Public in and before said County and State, by Karl R. Bletzacker, this the 17th day of February 2012.

Peggy Wright

Notary Public

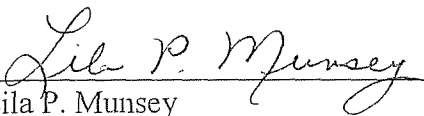


Peggy Wright
Notary Public-State of Ohio
My Commission Expires
July 6, 2015

My Commission Expires: 7.6.15

VERIFICATION

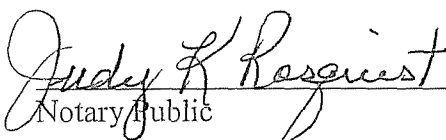
The undersigned, Lila P. Munsey, being duly sworn, deposes and says she is the Manager, Regulatory Services for Kentucky Power, that she has personal knowledge of the matters set forth in the forgoing responses for which she is the identified witness and that the information contained therein is true and correct to the best of her information, knowledge, and belief



 Lila P. Munsey

COMMONWEALTH OF KENTUCKY)
) CASE NO. 2011-00401
 COUNTY OF FRANKLIN)

Subscribed and sworn to before me, a Notary Public in and before said County and State, by Lila P. Munsey, this 17th day of February 2012.




 Notary Public

My Commission Expires: January 23, 2013


VERIFICATION

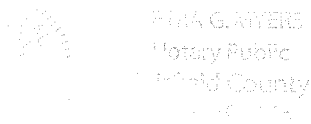
The undersigned, ROBERT L. WALTON being duly sworn, deposes and says he is Managing Director Projects and Controls for American Electric Power, that he has personal knowledge of the matters set forth in the forgoing responses for which he is the identified witness and that the information contained therein is true and correct to the best of his information, knowledge and belief


ROBERT L. WALTON

STATE OF OHIO)
) CASE NO. 2011-00401
COUNTY OF FRANKLIN)

Subscribed and sworn to before me, a Notary Public in and before said County and State, by Robert L. Walton, this the 15 day of February 2012.


Notary Public



My Commission Expires: 5-29-2012

VERIFICATION

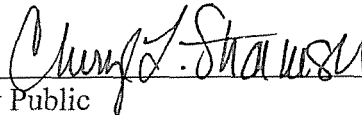
The undersigned, SCOTT C. WEAVER, being duly sworn, deposes and says he is Managing Director Resource Planning and Operation Analysis for American Electric Power, that he has personal knowledge of the matters set forth in the forgoing responses for which he is the identified witness and that the information contained therein is true and correct to the best of his information, knowledge and belief



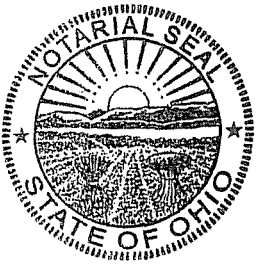
SCOTT C. WEAVER

STATE OF OHIO)
) CASE NO. 2011-00401
COUNTY OF FRANKLIN)

Subscribed and sworn to before me, a Notary Public in and before said County and State, by Scott C. Weaver, this the 16th day of February 2012.



Notary Public



Cheryl L. Strawser
Notary Public, State of Ohio
My Commission Expires 10-01-2016

My Commission Expires: October 1, 2016

VERIFICATION

The undersigned, Ranie K. Wohnhas, being duly sworn, deposes and says he is the Managing Director Regulatory and Finance for Kentucky Power, that he has personal knowledge of the matters set forth in the forgoing responses for which he is the identified witness and that 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. 2011-00401

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 17th day of February 2012.

Judy K. Rosquist

Notary Public

My Commission Expires: January 23, 2013

Kentucky Power Company

REQUEST

Refer to Kentucky Power's Response to Commission Staffs First Request for Information ("Staffs First Request"), Item 1.

- a. Explain the basis of the decision reflected in Kentucky Power's December 17, 2010 notice to terminate the East Pool Agreement effective January 1, 2014 without knowing the financial impacts to Kentucky Power or its ratepayers as of the effective date of the notice.
- b. Provide all studies and/or analyses relied upon and used to support Kentucky Power's decision to terminate the East Pool Agreement effective January 1, 2014.
- c. Provide a list of all agreements that would be affected by the termination of the East Pool Agreement among American Electric Power's ("AEP") east subsidiaries, with an explanation by agreement of the financial impact to Kentucky Power and its ratepayers.
- d. If the present East Pool Agreement had been effectively terminated on January 1, 2011, provide the monthly change in revenue requirement for the environmental surcharge reports during the 12 expense months of 2011. Show the monthly amount from ES FORM 1.00 LINE 1 CRR from ES FORM 3.00 less the monthly costs applicable to the surplus companies' plants.

- e. Explain how the Commission can make an informed decision as to Kentucky Power's application ("Application") for the approval of its 2011 Environmental Compliance Plan and Certificate of Public Convenience and Necessity to construct a dry flue gas desulfurization ("DFGD"), without knowing the complete financial impact to Kentucky Power and its ratepayers, if the current East Pool Agreement is effectively terminated on January 1, 2014.
- f. Explain whether the deregulation of electric generation in Ohio had any influence on the decision to terminate the East Pool Agreement effective January 1, 2014 and why terminating the agreement is beneficial to Kentucky Power and its ratepayers.

RESPONSE

- a. Please see KPSC 2-1 Attachments 1 and 2 for the East Pool Operating Committee minutes and the pool termination proposal from December 17, 2010.

Additionally, please refer to the accompanying CD for KPSC 2-1 Attachment 3 for the Company's FERC 205 filing related to the proposed new Power Cost Sharing Agreement (PCSA) and pages 2 through 7 specifically for additional information.
- b. Please see the accompanying CD for KPSC 2-1 Attachment 4 for an analysis pertaining to pool termination that was completed prior to December 17, 2010.
- c. Please see the Company's response to KPSC 1-1 part b. See the accompanying CD for KPSC 2-1 Attachment 4 for financial impacts related to terminating the IAA during the applicable period.
- d. Please see KPSC 2-1 Attachment 5 for the requested information for the twelve months of 2011. This analysis removes from the environmental surcharge all environmental costs related to surplus companies' plants. This should not necessarily be construed as representative of what the actual results may be when the current pool agreement expires and the new Power Cost Sharing Agreement (PCSA) begins. What environmental costs, if any, that the Company may ask to flow through the environmental surcharge from the PCSA has yet to be determined.

- e. On February 10, 2012, Kentucky Power filed notice with the Federal Energy Regulatory Commission of its intent to terminate the Pool Agreement effective the first quarter of 2013. The Company recognizes that its existing Environmental Compliance Plan, as well as the proposed Environmental Compliance Plan that is the subject of this proceeding, involve certain environmental compliance costs that are allocated to Kentucky Power. To the extent that these Pool-related costs are no longer allocated to Kentucky Power following the termination of the Pool Agreement they will no longer be flowed through to Kentucky Power's ratepayers through the environmental surcharge. The proposed PCSA as filed with the FERC contains no provisions related to environmental compliance costs. However, to the extent that resolution of the new arrangements that are now pending before the FERC result in the allocation of qualifying environmental compliance costs to Kentucky Power, the Company has not determined whether to seek to recover those allocated costs through the environmental surcharge. Under existing authority any such amendment of the Company's environmental compliance plan must be presented to the Commission for approval under KRS 278.183.

- f. Please see the Company's response to part a.

WITNESS: Ranie K Wohnhas

**Minutes of the December 17, 2010 Meeting
of the AEP Interconnection Agreement
Operating Committee**



Present: Committee Representatives

Richard Munczinski – Pool Manager
Charles Patton – Appalachian Power Company
Joseph Hamrock – Columbus Southern Power Company
and Ohio Power Company
Paul Chodak III – Indiana Michigan Power Company
Gregory Pauley – Kentucky Power Company

Counsel/Secretary

John Crespo, Esq.

The meeting was called to order at approximately 11:00 a.m. (EST) with Mr. Munczinski presiding. Mr. Munczinski identified one agenda item for Operating Committee ("Committee") action that was previously distributed to the Committee Members:

- 1) Termination of the AEP Interconnection Agreement (Attachment I)

The Committee reviewed a proposal to terminate the current AEP Interconnection Agreement ("Agreement").

The Committee Representatives discussed the benefit of the termination notice in that it would provide a reasonable and defined timeframe for the Member companies and stakeholders to accomplish the task of developing an updated agreement among willing Members and/or to allow any or all Members the option of operating in a "stand alone" fashion.

Mr. Patton and Mr. Hamrock noted that the Resource Planning process would necessarily be of prime importance in addressing each Member's energy and capacity position in the period following termination of the Agreement and began Committee discussion on how Member Companies that were significantly capacity-surplus or capacity-deficit could mitigate any resulting exposure. The Committee then discussed how the stakeholder process could provide a useful and effective forum for discussions between individual Members to identify possible bi-lateral or multi-party contracts that were mutually beneficial and would alleviate such concerns, especially if a replacement agreement was not reached, or in case an agreement was reached but did not adequately mitigate these concerns.

Committee Members then identified and discussed the potential that transitional approaches could also have if necessary to give one or more Members adequate time to implement their individual Member resource plans. All Member Representative then committed to investigating such transitional approaches as needed.

Mr. Chodak proposed a change to the proposal in section 2.a. to better reflect the current relationship between the PJM Settlement process and the Agreement settlement process. Following Committee discussion, the modification was agreed to by all of the Representatives.

Representatives also reviewed the form of the letter that would be signed and forwarded by each Member Representative for the required notification.

This was followed by general discussion regarding the process and timeframe that would be used to work with stakeholders, including state commissions and customers, to develop a post-Agreement plan for each Member. All Member representatives committed their support to this process.

Once all discussion had concluded, Mr. Munczinski called for a vote of the Operating Committee on the proposal, as amended. All Representatives approved the recommendation by voice vote. Subsequently, each Member noted their intent to sign and forward their respective individual notifications to terminate the Agreement.

Mr. Munczinski asked if there was any other business before the Committee at this time. Hearing none, the meeting was adjourned at approximately 12:00 p.m.

**AEP Interconnection Agreement (East Pool)
Proposal to the Operating Committee**



Date: December 17, 2010

Subject: Termination of the AEP Interconnection Agreement

Description

The AEP Interconnection Agreement ("Agreement") is a generation pooling agreement that was initially entered into on July 6, 1951. The Agreement has undergone various modifications, with the last one occurring November 1, 1980. Current parties to the Agreement include Appalachian Power Company ("APCO"), Kentucky Power Company ("KPCO"), Ohio Power Company ("OPCO"), Columbus Southern Power Company ("CSP") and Indiana Michigan Power Company ("I&M"), each of which is referred to as a "Member" (and collectively as the "Members") of the Agreement. The American Electric Power Service Corporation ("Agent") is also a party to the Agreement, acting as the agent on the behalf of the Members.

The Agreement has served the Members for almost sixty years, allowing the Members to share their generation resources to obtain the net requirements for each Member's internal load, share in off-system sales revenues, and provide risk mitigation for impacts due to such items as unplanned outages.

However, the Agreement is showing its age, and given its current provisions, minor modifications are not likely to improve the Agreement to a state in which it would continue to be effective in the long term.

In addition, the Interim Allowance Agreement ("IAA"), which acts as a corollary agreement between the same Members and Agent for treatment of items related to sulfur dioxide (SO₂) emissions and emission allowances, has also become out-of-date by the development of other emission allowance programs and requirements since it was last modified in 1996.

As a result, this proposal is to terminate the current Agreement and the IAA as specified below.

Recommendation

It is recommended that the Members terminate the Agreement. Such termination is to be performed by each Member individually providing the notification required by the Agreement.

Consequently, it is recommended that each of the Members notify each of the other Members and the Agent in the fourth quarter of 2010, such that the Agreement terminates among all the Members as of January 1, 2014 or such other date that cancellation of the Agreement is approved by the Federal Energy Regulatory Commission ("FERC") and becomes effective. It is also recommended that the Members terminate the IAA, to be effective concurrently with the termination of the Agreement.

AEP Interconnection Agreement (East Pool) Proposal to the Operating Committee

Support for Recommendation

1. Any Member or Members of the Agreement may terminate their participation in the Agreement by providing the notice specified in Section 13.2 of the Agreement:

"13.2 Any Member upon at least three years' prior written notice to the other Members and Agent may terminate this agreement at the expiration of said initial period or at the expiration of any successive period of one year."

Consequently, upon approval of this recommendation, each Member will provide the aforementioned written notice to the other Members and the Agent to initiate the three-year notice period. The proposed notification is provided as an attachment to this proposal.

While any Member may terminate its participation in the Agreement without the consent of the Operating Committee, this proposal has been brought to the Operating Committee in order to reach consensus among the Members to terminate their participation in the current Agreement. Consensus is desirable because many of the reasons described below in support of termination of the Agreement are applicable to all Members. Termination of the entire Agreement will enable a "fresh start" for each Member to determine a path that is in the best interest of itself, its individual customers and AEP moving forward. If all Members provide notice the Agreement will effectively be terminated as of the expiration of the notice period, subject to FERC approval.

2. Specific reasons for termination of the pool include the following:
 - a. AEP joined the PJM Interconnection L.L.C. ("PJM") Regional Transmission Organization ("RTO") in October 2004. Over the last six years, PJM has proven capable of fulfilling the role of economically dispatching the generating units of the Members to satisfy the capacity and energy requirements of their loads, a role historically performed by the Agent under the Agreement.¹ As such, the Agreement, at least in its current form, is less essential.
 - b. The state of Ohio has enacted legislation that requires the eventual corporate separation of CSP's and OPCO's generation. However, under the current Agreement that "deregulated" generation is pooled with the generation of the other Members whose generation is "regulated." This termination prepares for this eventual separation.
 - c. Changes in utility regulation and the energy markets have either occurred or are anticipated that were not contemplated by the Agreement or IAA that limit the effectiveness of comprehensive, system-wide system planning and dispatch. For example, renewable portfolio standards or goals have been established in several states that have resulted in the addition of wind and solar resources. Under these and emerging renewable portfolio standards, further additions of capacity for Members that are already in a surplus capacity position may be required, which is inconsistent with the

¹The Agent may still need to perform some limited functions for each of the individual Members under a subsequent agreement, such as managing and maintaining the interconnection points among the Members in a manner that supports system-wide reliability and participating in joint off-system sales activities that are not directly assignable to any Member.

AEP Interconnection Agreement (East Pool) Proposal to the Operating Committee

original intent of the Agreement. Environmental regulation of electric generation has also expanded in a manner that was not contemplated in the IAA, such as the implementation of an allowance program associated with the emission of nitrogen oxides (NO_x). Many new environmental regulations are also currently being considered that were also not contemplated and are likely to require more unit-specific rather than system-wide solutions.

- d. Pool termination promotes the long-term strategic objective of AEP to further decentralize utility operations by affording each Member more autonomy. For example, working with its customer representatives and other stakeholders, each Member will be able to make more independent decisions regarding how it plans for its own generation needs (e.g., "build or buy").

Implementation

During the three year notice period, the representatives of each of the Members will meet with interested stakeholders who will be impacted by the termination to attempt to reach a consensus on the best course of action for the Member regarding management and planning of its generation and load obligations following the termination.

These discussions will also allow any of the Members, if so desired by each of them, to enter into subsequent agreements. It is assumed that any such agreements would be mutually beneficial to all of the parties involved and AEP as a whole will be unharmed. If no such agreements are reached, each Member will operate independently in PJM (i.e. "stand alone"). The three-year period will allow each Member to confer with affected stakeholders, plan a just and reasonable course of action and begin implementation.

STEPTOE & JOHNSON ^{LLP}
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February 10, 2012

The Honorable Kimberly D. Bose
Secretary
Federal Energy Regulatory Commission
888 First Street, N.E.
Washington, D.C. 20426

Re: Appalachian Power Company
Docket No. ER12- -000
AEP Generation Resources Inc.
Docket No. ER12- -000
Indiana Michigan Power Company
Docket No. ER12- -000
Kentucky Power Company
Docket No. ER12- -000
Ohio Power Company
Docket No. ER12- -000

Dear Secretary Bose:

On behalf of Appalachian Power Company ("APCo"), Indiana Michigan Power Company ("I&M"), Kentucky Power Company ("KPCo"), Ohio Power Company ("Ohio Power"), and AEP Generation Resources Inc. ("AEP Generation Resources"), American Electric Power Service Corporation ("AEPSC") hereby submits for filing: (i) the "Power Cost Sharing Agreement among Appalachian Power Company, Indiana Michigan Power Company, Kentucky Power Company, and American Electric Power Service Corporation," ("Power Cost Sharing Agreement") and (ii) the "Bridge Agreement among Appalachian Power Company, Indiana Michigan Power Company, Kentucky Power Company, Ohio Power Company, AEP Generation Resources Inc. and American Electric Power Service Corporation" ("Bridge Agreement"). In conjunction with these new rate schedules, AEPSC also provides notice of the Companies' termination of (i) the Interconnection Agreement ("Pool Agreement") and (ii) the AEP System Interim Allowance Agreement ("IAA"). AEPSC respectfully requests that the Commission establish March 12, 2012, as the comment date for this filing.

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This filing includes the following documents in addition to the relevant Tariff Records¹:

1. Attachment A - Clean Tariff Attachments for the Power Cost Sharing Agreement (APCo Rate Schedule No. 200; I&M Rate Schedule No. 200; and KPCo Rate Schedule No. 200);
2. Attachment B - Clean Tariff Attachments for the Bridge Agreement (APCo Rate Schedule No. 201; I&M Rate Schedule No. 201; KPCo Rate Schedule No. 201; Ohio Power Rate Schedule No. 200; and AEP Generation Resources Rate Schedule No. 2); and
3. Attachment C - Certificates of Concurrence signed on behalf of I&M, KPCo, Ohio Power, and AEP Generation Resources.

I. BACKGROUND

APCo, I&M, KPCo, Ohio Power², and AEPSC are wholly-owned subsidiaries of American Electric Power Company, Inc. ("AEP"). Together with their affiliates Kingsport Power Company ("Kingsport") and Wheeling Power Company ("Wheeling"), APCo, I&M, KPCo, and Ohio Power make up the AEP East utilities. The AEP East utilities are members of and operate within the footprint of PJM Interconnection, L.L.C. ("PJM"). AEPSC is a service company that provides various services to the AEP East utilities and their affiliate utilities that operate within the footprints of the Southwest Power Pool ("SPP") and the Electric Reliability Council of Texas ("ERCOT"). The AEP utilities in SPP and ERCOT are not part of and are not affected by this filing.

The AEP East utilities have for decades operated as part of an integrated public utility holding company system under the now-repealed Public Utility Holding Company Act of 1935. As part of that arrangement, those companies that owned electric generating resources (APCo, CSP, I&M, KPCo, and Ohio Power) coordinated the planning and operations of their respective generating resources pursuant to their Interconnection Agreement ("Pool Agreement").³ (The parties to the Pool Agreement are referred to herein as the "Pool Members," which includes CSP prior to January 1, 2012.) Kingsport and Wheeling are not parties to the Pool Agreement, as they do not own generation; they purchase their power requirements from APCo and Ohio Power, respectively. The Pool Members also are parties to the IAA, pursuant to which they have

¹ The same filing is being submitted in three Tariff IDs, so the relevant Tariff Records will vary with each of the three filings. Each of the three filings will include Attachments A through C.

² On December 31, 2011, Columbus Southern Power Company ("CSP") was merged into and became part of Ohio Power.

³ The Pool Agreement, which has been amended several times, is on file with the Commission as APCo's Rate Schedule No. 20, CSP's Rate Schedule No. 30, I&M's Rate Schedule No. 17, KPCo's Rate Schedule No. 11, and Ohio Power's Rate Schedule No. 23.

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coordinated and integrated their compliance with certain environmental rules and regulations; Kingsport and Wheeling are not parties to the IAA.

For the reasons discussed below, each Pool Member provided notice to the other Pool Members (and to AEPSC) that it will terminate its participation under the Pool Agreement in accordance with the termination provision in the agreement. Three of the current Pool Members—APCo, I&M, and KPCo—together with AEPSC, have agreed to proceed under a new arrangement that is the subject of this filing; *i.e.*, the Power Cost Sharing Agreement.⁴ In addition, the Pool Members have agreed to terminate the IAA.

Before discussing the new Power Cost Sharing Agreement and the Bridge Agreement, set out below is an overview of the current Pool Agreement and the reasons that the Pool Members provided notice to terminate that agreement. Also discussed below are the reasons that the Pool Members agreed to terminate the IAA as well.

A. The Pool Agreement

As the Commission previously has recognized, under the Pool Agreement, generation is planned and operated on a single-system basis in order to meet the needs of the customers of all the members of the agreement. *AEP Generating Company and Kentucky Power Company*, 38 FERC ¶ 61,243 at 61,812 (1987). Each Pool Member's generating capacity obligation is determined based on its Member Load Ratio ("MLR"). MLRs are calculated monthly on the basis of each member's non-coincident peak ("NCP") demand in relation to the sum of the NCP demands of Pool Members during the preceding twelve months. Over the years, the Pool Members jointly satisfied the Pool's combined need for capacity and energy, even though if viewed individually, some Pool Members from time to time had surplus generating capacity and others were capacity deficit.

Members make or receive capacity payments based upon the extent to which they are deficit or surplus, and the generation costs of the surplus members. The total capacity surplus in any given month for surplus members always equals the total capacity deficiency for the deficit members, producing a zero surplus/deficit balance for the Pool Members. The Pool Agreement also has an energy component. Energy transactions occur between the Pool Members such that each member has sufficient energy to meet its share of the system's total sales made in that month. A Pool Member that produces more energy than needed to meet its requirements sells the excess to members that need additional energy to meet their total energy requirement. The sale is made at the seller's average variable production cost for the month. The Pool Agreement also provides for the allocation among the Pool Members of the revenues and/or costs associated with power sales to, or purchases from, third parties. Each member receives its MLR share of the off-system sales margins associated with any such sales.

⁴ In a related proposed transaction for which Commission approval is being sought under FPA Section 203, Wheeling will merge into APCo and APCo will serve the former Wheeling load. Kingsport will continue to be served under its wholesale purchase agreement with APCo.

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The Pool Agreement designates AEPSC as the members' agent. The agent is responsible for, among other things, the coordination of the members' respective generating resources, the arrangement of capacity and/or energy transactions with third parties, and the accounting for and preparation of the settlements for internal pool transactions among the members.

B. Termination of the Pool Agreement

Section 13.2 of the Pool Agreement provides:

Any Member upon at least three years' prior written notice to the other Members and Agent may terminate this agreement at the expiration of said initial period [December 31, 1971] or at the expiration of any successive period of one year.

On December 17, 2010, in accordance with Section 13.2 of the Pool Agreement, each of the then five members of the pool provided notice to the other members (and to AEPSC) to terminate the Pool Agreement on January 1, 2014, or such other date as may be accepted by this Commission. Although the Pool Agreement has served the Pool Members and the other AEP East utilities and their customers well over the past six decades, cumulative changes in the structure of the electric industry led the Pool Members to determine that it was necessary to consider alternatives to the current structure, including having no agreement among any of the AEP East utilities that own generation. These changes include evolving environmental regulations, the introduction of open access to transmission facilities, the advent of regional transmission organizations, movement toward industry deregulation, an increased emphasis on demand side management, and expanding competition.⁵ In addition, Ohio Power recently has begun to experience a substantial number of retail customers switching to competitive retail service providers.

These changes have raised questions as to the continuing viability of the Pool Agreement. In July 2010, for example, the Virginia State Corporation Commission ("Virginia Commission") issued an order in an APCo rate proceeding that directed APCo and AEP to submit a report regarding "the steps that can be taken to ameliorate the negative effects of high capacity charges on APCo and its customers." APCo filed its report with the Virginia Commission, detailing, among other things, the history of the Pool Agreement, the changes over the years to the make-up of the members' respective generating resource portfolios, and trends in the capacity equalization rates and energy rates. As APCo's report noted,

⁵ For example, five of the seven states in which the AEP East utilities operate currently have alternative/renewable energy portfolio requirements or goals, and the resources that qualify and the applicable standards vary significantly over time; some renewable standards include the use of energy efficiency programs while others include specific energy efficiency requirements or goals. In addition, demand response programs are addressed differently in different states; some permit customers to enroll in PJM demand response programs (either directly or through a third party aggregator), while others require enrollment with the utility. Each of these programs requires an accommodation of state- and operating-company specific requirements that were not contemplated under the Pool Agreement.

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While it is undeniable that the [Pool Agreement] has provided tremendous benefits to each of the operating companies and their customers through its near 60 year existence, it has become increasingly difficult for AEP planners to confront the realities of today's electric utility industry with an allocation methodology from a far simpler era. This is evidenced by the fact that regulatory commissions, including the [Virginia Commission] and others have started to question . . . the Pool's viability in the current power supply environment.⁶

In addition to the concerns raised by the Virginia Commission, over the past several years the Public Utilities Commission of Ohio ("Ohio Commission") has issued a series of orders implementing legislation providing for the restructuring of the electric industry in Ohio. In accordance with the legislative initiatives, the Ohio Commission recently issued orders designed to enhance retail competition in Ohio Power's service territory. The most recent set of Ohio Commission orders provides for all of the retail load in Ohio Power's service territory to be fully subject to an auction process by June 1, 2015.⁷ In addition, the Ohio Commission-approved restructuring plan calls for Ohio Power to separate its generation resources and related facilities from its transmission and distribution facilities, with a new generation-owning affiliate (AEP Generation Resources) created to own and operate the generation facilities. This corporate restructuring transaction is the subject of a proceeding under Section 203 of the Federal Power Act that is pending before the Commission as a result of an application filed contemporaneously with this filing. Once the corporate separation transaction is implemented (which is expected to occur by the end of the first quarter of 2013), Ohio Power will be a transmission and distribution company, and AEP Generation Resources will own and operate generating units previously owned by Ohio Power (including the generation formerly owned by CSP).⁸

The schedule approved by the Ohio Commission calls for Ohio Power to institute a competitive bidding process for its retail load for delivery beginning on June 1, 2015. The auction for the first tranches of retail load will be conducted in September 2013. The schedule further provides for Ohio Power to complete corporate separation prior to that auction. Accordingly, Ohio Power's target is to obtain all regulatory approvals necessary to enable the corporate separation and related transactions to be consummated by the end of the first quarter of 2013. Once corporate separation occurs and Ohio Power's auction process is underway, Ohio Power's further participation under the Pool Agreement will be impractical, as Ohio Power will no longer have traditional franchised retail customers and, once the corporate separation

⁶ "Report of Capacity Matters" submitted by Appalachian Power Company in Virginia Commission Case No. PUE-2009-00030 (January 4, 2011).

⁷ See, e.g., <http://dis.puc.state.oh.us/TiffToPDF/A1001001A11L14B41654E58708.pdf>, and <http://dis.puc.state.oh.us/TiffToPDF/A1001001A12A23B41324B48337.pdf>.

⁸ In a separate but related Section 203 application submitted contemporaneously with this filing, Ohio Power and AEP Generation Resources are seeking Commission approval to transfer ownership interests in two of Ohio Power's generating stations to APCo and KPCo.

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transaction is consummated, Ohio Power, like Kingsport and Wheeling, will not own or operate generating units that would be available to the other Pool Members.⁹

For the foregoing reasons, the Pool Members agreed to terminate the existing Pool Agreement.¹⁰ The remaining Pool Members (*i.e.*, APCo, I&M, and KPCo) have agreed to move forward with a new arrangement that is discussed in detail in Section II below. As noted above, the Pool Members' respective December 17, 2010 notices of termination provided for termination of the Pool Agreement to be effective on January 1, 2014, or such other date accepted by the Commission. In order to align the termination of the current agreement with retail restructuring in Ohio, the Pool Members unanimously agreed to waive the full three-year notice provision and request that the Commission accept termination at a date at or near the end of the first quarter of 2013 that will coincide with those related transactions. AEPSC will provide notice to the Commission shortly after the consummation of these transactions, including termination of the Pool Agreement.

The Pool Members have carefully coordinated termination of the Pool Agreement with other arrangements in order to lessen any adverse impact on the Pool Members. For example, the Power Cost Sharing Agreement discussed below provides a vehicle for the remaining Pool Members to share the benefits of each other's surplus energy with costs lower than the PJM market clearing price. That agreement also provides opportunities for internal capacity transactions. Similarly, the simultaneous timing of the termination of the IAA, discussed immediately below, allows for the benefits and burdens from terminating that agreement to be somewhat counterbalanced by the benefits and burdens of terminating the Pool Agreement. In addition, the simultaneous transfer of certain Ohio Power baseload generation to APCo and KPCo (discussed above in footnote 8) was designed to address the fact that APCo and KPCo, which are capacity deficit, will no longer be able to access capacity from Pool Members that have surplus capacity. Finally, the Bridge Agreement discussed below in Section III provides for a fair allocation of the cost of meeting pre-existing Fixed Resource Requirement ("FRR") obligations and settling pre-existing marketing and trading positions that will survive termination of the Pool Agreement.

The Commission has had occasion to review issues concerning the proposed withdrawal of one or more members from an integrated holding company's pool arrangements in *Entergy Services, Inc.*, 129 FERC ¶ 61,143 (2009); *order denying reh'g*, 134 FERC ¶ 61,075 (2011). In that case, the Commission ruled that there are three specific questions concerning the proposed

⁹ Under the Ohio Commission-approved structure, AEP Generation Resources will be required, through May 31, 2015, to provide Ohio Power with the capacity and energy associated with the load of those retail customers that do not select alternative retail electric suppliers (referred to in Ohio as the Standard Service Obligation, or "SSO"). The basic rate structure of the SSO service has been approved by the Ohio Commission, and in a separate Section 205 application being filed contemporaneously with this filing, Ohio Power and AEP Generation Resources are seeking Commission approval of the SSO Contract.

¹⁰ The Pool Agreement has not been submitted through eTariff and thus may be cancelled by means of a Transmittal Letter.

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withdrawal: whether the members are permitted to leave the arrangement; whether they are required to compensate any remaining members; and whether they have any “continuing obligations” to the remaining members. 129 FERC ¶ 61,143 at P 58. As confirmed by review of Section 13.2, the Pool Agreement permits each Pool Member to terminate its agreement (the equivalent of withdrawing from the agreement), and neither requires a terminating Pool Member to compensate the other Pool Members nor imposes upon a terminating Pool Member any continuing obligation to the other Pool Members. Section 13.2 is refreshingly straightforward: a terminating Pool Member must simply provide the other Pool Members with three years’ prior written notice of its proposed termination.

In *Entergy*, the Commission further ruled that acceptance of the members’ proposal to withdraw from the agreement does not turn on the justness and reasonableness of the potential successor arrangements; that determination is made when such arrangements are submitted for Commission review. 134 FERC ¶ 61,075 at P 24. As noted, APCo, I&M, and KPCo have agreed to a new set of arrangements, *i.e.*, the Power Cost Sharing Agreement. That agreement is discussed below, and any issues surrounding the justness and reasonableness of that agreement may be resolved in this docket.

C. Termination of the IAA

The IAA originally was submitted for filing on September 30, 1994, in Docket No. ER94-1670, and was accepted for filing by Letter Order issued in that docket on December 30, 1994, and made a supplement to each member’s Pool Agreement rate schedule designation, as shown below. On June 21, 1996, AEPSC, on behalf of the Pool Members, filed Modification 1 to the IAA in Docket No. ER96-2213. This modification was accepted for filing by Letter Order issued in that docket on August 30, 1996. The current version of the IAA has been in effect since September 1, 1996, and has been given the following rate schedule designations¹¹:

Appalachian Power Company	Supplement No. 9 to Rate Schedule No. 20
Columbus Southern Power Company	Supplement No. 3 to Rate Schedule No. 30
Indiana Michigan Power Company	Supplement No. 10 to Rate Schedule No. 17
Kentucky Power Company	Supplement No. 6 to Rate Schedule No. 11
Ohio Power Company	Supplement No. 9 to Rate Schedule No. 23

The IAA was developed and entered into in connection with the Pool Members’ efforts to comply with the 1990 amendments to the Clean Air Act, and in particular Title IV thereto.¹² As implemented by the United States Environmental Protection Agency, the 1990 Amendments provided for, among other things, a sulfur dioxide (SO₂) emission allowances regime that eventually would affect over seventy of the Pool Members’ electric generating units, with one allowance being equal to the right to emit one ton of SO₂. Consistent with the coordinated

¹¹ Because the IAA was designated as a Supplement to the rate schedule that was the Pool Agreement, terminating the Pool Agreement rate schedule would result in termination of the IAA, absent the IAA being removed from the relevant rate schedule.

¹² 104 Stat. 2584, 42 U.S.C.A. § 7561, *et seq.* (“1990 Amendments”).

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system operations under the Pool Agreement, the IAA was intended to provide for coordinated and integrated compliance with the 1990 Amendments through an equitable methodology to allocate emission allowances to the Pool Members and to allocate either the cost of acquiring, or the proceeds associated with the sale of, allowances to or from non-affiliated third parties. For administrative ease, each member would own its load ratio share of allowances at the end of each year. The internal transfer price for the allowances was established as the System Cost of Compliance (\$115.43/ton in 1995, escalated annually at a fixed rate of 10.56%). For 2011, the System Cost of Compliance was \$575.29.

Since the IAA was put into place in 1994 and subsequently modified in 1996, there have been significant changes in environmental rules and the markets associated with Title IV SO₂ emissions allowances that make the IAA obsolete. These developments include most notably: (1) additional environmental compliance obligations added since 1994 whose stringency on power plant emissions has or will eclipse obligations under Title IV for SO₂, (2) the continuing uncertainty surrounding the environmental compliance regulations, (3) the extension of AEP's environmental controls program to plants beyond the Gavin Plant, which has resulted in the addition of scrubbers to twelve additional AEP East generating units, (4) elimination, in part as a result of the foregoing two factors, of any shortage of the Pool Members for Title IV SO₂ allowances, and (5) the emergence of a robust secondary market for Title IV SO₂ allowances and their current and projected availability at low cost from that market. For all these reasons, the Pool Members agree that the IAA should terminate when the Pool Agreement terminates.

II. THE POWER COST SHARING AGREEMENT

The Power Cost Sharing Agreement is designed to provide APCo, I&M, and KPCo with the opportunity to arrange internal energy transactions among themselves and to enter into capacity sales and purchases with each other. AEP Generation Resources will be a standalone generating company that will not have a franchised service territory and will not have the traditional utility obligation to serve retail customers (other than the discrete SSO obligations during the short time period before all Ohio Power retail load will be subject to state-supervised auctions). Therefore, AEP Generation Resources will not be a party to the new Power Cost Sharing Agreement. The key difference between the Power Cost Sharing Agreement and the current Pool Agreement is that under the new arrangement, generation will not be planned on a single-system basis; APCo, I&M, and KPCo individually will be required to own sufficient generation to meet their load and reserve obligations.¹³ Likewise, the Power Cost Sharing Agreement does not impose capacity equalization charges on deficit members.

The Power Cost Sharing Agreement generally provides for APCo, I&M, and KPCo (referred to in the agreement as an "Operating Company" or collectively as the "Operating

¹³ To reflect the fact that the Pool Agreement enabled deficit members (APCo and KPCo) to access the capacity and energy of those members with surplus generation (such as Ohio Power), certain of Ohio Power's generating resources that will be obtained by AEP Generation Resources will immediately be transferred to APCo and KPCo to enable them to meet their load and reserves obligations. *See* note 8, *infra*.

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Companies”) to conduct internal energy transactions amongst themselves, arrange for internal capacity transactions, and coordinate their participation in organized regional power markets. As with the current Pool Agreement, AEPSC will continue to act as the agent with responsibility for assisting each Operating Company in its evaluation of power supply resources to meet load requirements; assisting in the coordination and operation of each Operating Company’s power supply resources (including arranging internal energy transactions); conducting off-system purchases and sales on behalf of the Operating Companies; and coordinating the procurement of fuel, consumables, emission allowances, and transportation services. *See* Article V. Governance under the Power Cost Sharing Agreement will be accomplished through an Operating Committee consisting of representatives of each Operating Company and AEPSC as the agent. The Operating Committee’s primary duties will be to review procedures for cost allocation under the agreement and to coordinate efforts to implement measures necessary for the reliable and economic use of the Operating Companies’ respective power supply resources. *See* Article VI.

The key provisions of the Power Cost Sharing Agreement are set out in Article VII (“Operating Company Planning and Operations”) and the related Service Schedule A (“Collective Participation in the Applicable Regional Transmission Organization Capacity Market”) and Service Schedule B (“Surplus Energy Sales”). Section 7.1 provides that each of the Operating Companies will be individually responsible for planning to meet its capacity obligations. However, the Agent (AEPSC) will provide annual resource adequacy assessments (from the individual company and pool-wide perspectives) and make recommendations to each Operating Company as to the need to add power supply resources and the extent to which such resources may be available from one or both of the other Operating Companies. The Agent also will make recommendations as to the extent to which an Operating Company has temporary surplus power supply resources that could be made available to one or both of the other Operating Companies or to third parties. Service Schedule A, which is discussed below, sets out the terms for any capacity sales and purchases among the Operating Companies. Article VII also provides for the Agent to coordinate the scheduling of planned generation outages (Section 7.2), and to coordinate the dispatch of the Operating Companies’ generating resources subject to the direction of the applicable regional transmission organization (“RTO”) (Section 7.3).

Section 7.5 sets out the terms for capacity transactions with third parties. Such transactions generally will be directly assigned to a specific Operating Company. Capacity purchases that are not directly allocated generally will be allocated to the Operating Company or Companies with the lowest capacity reserve margin(s) over the duration of the transaction. Sales transactions that are not allocated to a specific Operating Company generally will be allocated to the Operating Company or Companies with the highest capacity reserve margin(s) over the duration of the transaction. Capacity purchases and sales that occur under an RTO auction process will be directly assigned to an Operating Company based on the auction results; the implementation details are specified in Service Schedule A. That schedule discusses the Agent’s evaluation of the feasibility of capacity transactions between the Operating Companies and the internal transfer price (the auction clearing price) (A3); the treatment of auction revenues (A4); and the settlement procedures (A5).

Section 7.6 of the Power Cost Sharing Agreement addresses energy purchases and sales with third parties. Purchases and/or sales initiated at the direction of a specific Operating

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Company generally will be directly assigned to that company. Purchases not directly assigned will be allocated among the Operating Companies based on the level of each company's "Internal Load" (retail and wholesale requirements customers). Sales not directly assigned will be allocated based upon each Operating Company's hourly energy surplus (measured by the sum of the hourly output of the company's resources and purchases, less the company's internal load and "Surplus Energy" sales). Section 7.7 specifies that Surplus Energy is the energy available from an Operating Company's generating resources.

Service Schedule B specifies more details concerning Surplus Energy sales. Item B2 of the schedule specifies the conditions under which intra-company sales may take place; namely, that the seller must have Surplus Energy available (as described above), and that Surplus Energy will be sold to another Operating Company only if the "Surplus Energy Price" is less than the purchasing company's "Avoided Cost." The Power Cost Sharing Agreement defines Avoided Cost as the purchaser's "costs that otherwise would have been paid for Spot Market energy" in RTO organized markets. Item B3 defines the Surplus Energy Price as a standard split-the-savings calculation based on the purchaser's Avoided Cost and the "Seller's Incremental Cost," which includes, among other things, the seller's cost of fuel, reactive power, operation and maintenance and start-up costs, emission allowances, and transmission and ancillary service charges. Finally, Item B4 provides that no Surplus Energy transactions will occur if the Surplus Energy Price equals or exceeds the purchaser's Avoided Cost, and that transactions involving two Operating Companies will be allocated to those companies based on their respective Surplus Energy (for sellers) or their Internal Load deficits (for purchases).

III. BRIDGE AGREEMENT

In conjunction with the termination of the Pool Agreement, APCo, I&M, KPCo, Ohio Power, AEP Generation Resources, and AEPSC (as agent) will operate under the Bridge Agreement. As its name implies, the Bridge Agreement is intended to be an interim arrangement that will be in place only for a short time. As discussed in more detail below, the Bridge Agreement addresses: (a) the treatment of those purchases and sales made by the agent on behalf of the Pool Members that extend beyond termination of the Pool Agreement, and (b) how APCo, I&M, KPCo, and Ohio Power will fulfill their existing FRR obligations under the PJM Reliability Assurance Agreement ("RAA") through the PJM planning year 2014/2015 (ending May 31, 2015). APCo, I&M, KPCo, and Ohio Power are referred to in the Bridge Agreement as "Operating Companies."

Article II of the Bridge Agreement provides that the term commences upon the effective date of the separation of Ohio Power's generation and power marketing business from its transmission and distribution business pursuant to Ohio restructuring (as discussed above), and terminates upon the later of the settlement of the contracts in the legacy marketing and trading portfolio or the end of Ohio Power's FRR obligation. Article III provides for AEPSC to serve as agent and to prepare summary reports of activities under the Bridge Agreement. Article IV provides for the creation of an Operating Committee composed of a representative of each of the parties, with AEPSC's representative serving as the chair of the Operating Committee. Certain functions under the Bridge Agreement may be delegated to one or more subcommittees. The

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two key articles of the Bridge Agreement are Article V (“FRR Obligation”) and Article VI (“Legacy Contracts”).

The FRR provisions were added to the RAA in connection with PJM’s Reliability Pricing Model (“RPM”), which was designed to ensure the availability of necessary generation resources that can be called upon and delivered to maintain the overall reliability of the PJM markets. In conjunction with the development of the RPM rules, PJM also developed the FRR alternative, under which a load-serving entity (designated as an “FRR Entity”) has the option to submit an “FRR Capacity Plan” and meet a fixed capacity resource requirement rather than participate through the RPM capacity auction. In addition to meeting its own load obligations, an FRR Entity is required to reflect in its FRR Capacity Plan any retail load that switches to an alternative retail load-serving entity that opts not to submit its own FRR Capacity Plan. The AEP East utilities have been operating under the FRR alternative since the implementation of the RPM. As such, the AEP East generating resources, including those of Ohio Power, have been dedicated to meeting the AEP East utilities’ FRR obligations.

The FRR provisions of the RAA place the obligation to maintain sufficient capacity on the load-serving entity, which includes Ohio Power. The transfer of Ohio Power’s generation to AEP Generation Resources and the termination of the Pool Agreement required the Pool Members to adopt new arrangements to meet the AEP East FRR capacity obligations. Those arrangements are set out in Article V of the Bridge Agreement, which, among other things, commits AEP Generation Resources to make its generation available to meet the Operating Companies’ FRR capacity obligations through the PJM Planning Year that ends on May 31, 2015. After that, Ohio Power will terminate its role as an FRR Entity and will participate in the RPM auctions to meet its residual capacity requirements.

Section 5.1 provides for the Agent to analyze the Operating Companies’ FRR obligations in light of projected changes to their capacity resources or their capacity requirements, and to recommend a capacity resource plan to meet those obligations. The plan for the Operating Companies will be reviewed and must be unanimously approved by the Operating Companies; likewise, AEP Generation Resources must separately approve the portion of the plan that impacts its capacity resource plan. AEP Generation Resources will not have access to information relating to the Operating Companies’ resources. If the Agent’s plan is not approved, the Agent will revise and resubmit the plan until it is accepted by the Operating Companies and by AEP Generation Resources. Section 5.2 provides for the Agent to collect information during a PJM Planning Year and, based on that information, to alter the combination of capacity resources so as to meet the FRR capacity obligation in a way that minimizes compliance charges to the extent reasonably practicable. Section 5.3 provides that allocations of charges and credits associated with (i) capacity resource purchases and sales and (ii) FRR charges and credits will be based on an average of the Pool Members’ MLRs for each of the last twelve months preceding termination of the Pool Agreement (“Final MLR”). Finally, Section 5.4 provides that the fulfillment of the Operating Companies’ FRR capacity obligations, including the allocation of charges and credits, is governed by the Bridge Agreement and not by the Power Cost Sharing Agreement discussed above.

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Article VI addresses the treatment of the "Legacy Contracts Portfolio," which includes "Legacy Trading Contracts" (power purchases and sales made pursuant to the Pool Agreement) and "Legacy Hedge Contracts" (physical and financial transactions that hedge the Pool Members' generation resources) that are in effect at the time that the Pool Agreement is terminated. Section 6.1.1 of the Bridge Agreement provides for the Agent to settle the Legacy Trading Contracts and Legacy Hedge Contracts in accordance with their contractual terms. Gains and losses from settlement and liquidation of the Legacy Trading Contracts will be allocated among the parties based on the Final MLR. That section further provides that the Agent may, from time to time, enter into new transactions on behalf of the Operating Companies to reduce the tenor and risk of the portfolio (such new arrangements will then be treated as Legacy Trading Contracts), but such new arrangements cannot extend beyond the final delivery month of the agreements in the portfolio of Legacy Trading Contracts.

Section 6.1.2 provides for the Agent to allocate gains and losses from the settlement and liquidation of the Legacy Hedge Contracts to APCo, I&M, KPCo (collectively) and to AEP Generation Resources (as successor to Ohio Power's obligations) in a ratable manner based on the respective forecasted spot market energy sales of APCo, I&M, KPCo (collectively) and AEP Generation Resources determined as of the effective date of the Bridge Agreement. The forecasted spot market energy sales are derived from the forecasted output of generation minus forecasted internal load. The allocation of gains and losses among APCo, I&M, and KPCo will be based on their forecasted spot market energy sales. If the forecasted internal load of either APCo, I&M, KPCo (collectively) or AEP Generation Resources exceeds the forecasted output of their respective owned or controlled generation for a given month, then APCo, I&M, KPCo or AEP Generation Resources, as applicable, will not receive any allocation of gains or losses for that month, unless both are in that position, in which case gains or losses will be allocated ratably among APCo, I&M, KPCo, and AEP Generation Resources in proportion to the forecasted output of their owned or contracted generation.

The remaining articles address standard commercial matters, such as billing (Article VII), force majeure (Article VIII), general miscellaneous terms (Article IX), and regulatory approvals (Article X).

IV. TIMELINE FOR FURTHER PROCEEDINGS

A September 7, 2011, stipulation entered into by CSP, Ohio Power, the Staff of the Ohio Commission, and nearly twenty other parties to various Ohio Commission retail proceedings involving CSP and Ohio Power set out an agreed-upon timeline for the Section 205 proceeding relating to the termination of the Pool Agreement and any new or modified agreement. The Stipulation provides for the AEP companies to "diligently pursue" approval of the Section 205 filings (and a related Section 203 application to implement Ohio restructuring) in accordance with the timeline, although the stipulation makes clear that the final schedule will be the one approved by this Commission.

The AEP companies that are the subject of this filing believe that this filing raises no material issues of fact that require resolution through hearing procedures. AEP therefore urges the Commission to accept the filing, as provided for above, without condition or modification,

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and without initiating any further proceedings. Appendix B to the Ohio Commission stipulation provides, however, that if certain parties believe that this Section 205 filing necessitates hearing procedures and the Commission agreed, that AEP would request that the Commission first initiate a 60-day Settlement Judge procedure, during which the parties would attempt to resolve any open issues. At the end of that process, AEP may submit an offer of settlement on some or all of the issues. If the offer is contested, parties may contest approval of the settlement under the Commission's standard Rule 602 procedures. Unresolved issues will then be the subject of a four-month "paper hearing" process, after which the matter will be before the Commission for final resolution.

V. EFFECTIVE DATES

The termination of the current Pool Agreement (and the IAA) and the effectiveness of the proposed new Power Cost Sharing Agreement and the new Bridge Agreement are intended to take place at the time that Ohio Power and AEP Generation Resources implement the Ohio corporate separation transaction. That currently is anticipated to occur by the end of the first quarter of 2013. That schedule will permit the first auction for Ohio Power's retail load to occur in September 2013, and Ohio Power's generation to be transferred to AEP Generation Resources so that it may participate in the auction. At that point, it will be appropriate for the current Pool Agreement to terminate, and for (i) APCo, I&M, and KPCo to start transacting under the new Power Cost Sharing Agreement, and (ii) APCo, I&M, KPCo, Ohio Power, and AEP Generation Resources to implement the Bridge Agreement. The Tariff Records are thus being submitted with a 12/31/9998 proposed effective date. As discussed above, although the Pool Members originally provided each other with notices of termination that contemplated an effective date of December 31, 2013, they since have waived the full notice provision of Section 13.2 to enable termination of the Pool Agreement to coincide with implementation of Ohio restructuring.

VI. GENERAL FILING INFORMATION

In compliance with the requirements of 18 C.F.R. § 35.13, AEP states as follows:

A. **General Information – 18.C.F.R. § 35.13(b)**

The documents provided with this filing include this Transmittal Letter and the materials listed above. The persons upon whom this filing has been served are set out below in Section VII. A description of and the reasons for the rate changes proposed are discussed in this Transmittal Letter. AEPSC further states that there are no costs included in the agreements that have been alleged or judged in any administrative or judicial proceeding to be illegal, duplicative, or unnecessary costs that are demonstrably the product of discriminatory employment practices.

B. **Cost of Service Information**

AEPSC requests waiver of those provisions in Section 35.13 that would require AEPSC to submit cost-of-service and revenue data. The Power Cost Sharing Agreement and the Bridge Agreement are entirely new arrangements and, therefore, no meaningful comparison may be made of revenues that were collected under prior arrangements. The Power Cost Sharing

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Agreement provides for voluntarily capacity and/or internal energy transactions, the cost of which depend upon the PJM capacity auction prices or the PJM spot market prices, which, of course, fluctuate. The Bridge Agreement does not provide for new transactions among the parties, but rather for the generating companies to make their capacity available to meet the pre-existing FRR obligations (at the FRR prices set out under the RAA), and for the unwinding of current marketing and trading positions, which will turn on prevailing market prices.

VII. CORRESPONDENCE AND SERVICE

AEPSC requests that any correspondence or communications with respect to this filing be sent to the following:

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A copy of this filing will be served on the Indiana Utility Regulatory Commission, the Kentucky Public Service Commission, the Michigan Public Service Commission, the Public Utilities Commission of Ohio, the Tennessee Regulatory Authority, the Virginia State Corporation Commission, and the Public Service Commission of West Virginia. In addition, a copy of this filing will be posted on AEP's website at:
<http://www.aep.com/investors/currentRegulatoryactivity/regulatory/ferc>.

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VIII. CONCLUSION

For the foregoing reasons, AEPSC respectfully requests that the Commission accept for filing, without condition or modification, the Power Cost Sharing Agreement and the Bridge Agreement. If you have any questions concerning this filing, please do not hesitate to contact the undersigned.

Respectfully submitted,

AMERICAN ELECTRIC POWER
SERVICE CORPORATION

By: _____/s/_____

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Attachments

Attachment A

Power Cost Sharing Agreement Among Appalachian Power Company, Indiana
Michigan Power Company, Kentucky Power Company and American Electric Power
Service Corporation as Agent

1. Tariff Record, APCo – FERC Rate Schedule No. 200
2. Tariff Record, KPCo – FERC Rate Schedule No. 200
3. Tariff Record, I&M – FERC Rate Schedule No. 200

RATE SCHEDULE No. 200

POWER COST SHARING AGREEMENT

among

**APPALACHIAN POWER COMPANY,
INDIANA MICHIGAN POWER COMPANY,
KENTUCKY POWER COMPANY**

and

AMERICAN ELECTRIC POWER SERVICE CORPORATION

as Agent

POWER COST SHARING AGREEMENT

THIS AGREEMENT is made and entered into as of this ___ day of _____, 2013, by and among Appalachian Power Company ("APC"), Indiana Michigan Power Company ("I&M"), Kentucky Power Company ("KPC") and American Electric Power Service Corporation (as defined below, "AEPSC") as agent to the other parties (as defined below, "Agent").

WHEREAS, APC, I&M and KPC (collectively the "Operating Companies") own and operate electric generation, transmission and distribution facilities with which they are engaged in the business of generating, transmitting and selling electric power and energy to the general public and to other electric utilities;

WHEREAS, the Operating Companies electric facilities are now and have been for many years interconnected through their respective transmission facilities and transmission facilities of third parties at a number of points (hereby designated and hereinafter called "Interconnection Points");

WHEREAS, APC, I&M and KPC provide power to serve retail customers in Indiana, Kentucky, Michigan, Tennessee, Virginia and West Virginia;

WHEREAS, APC, I&M and KPC believe that they can continue to achieve efficiencies and economic benefits through the coordinated operation of their respective power supply resources;

WHEREAS, the Operating Companies, in order to recognize that APC, I&M and KPC will (a) participate in the organized power markets of a regional transmission organization; (b)

provide each other with internal economic energy transfers under conditions described in this Agreement; I receive allocations of off-system sales and purchases with non-affiliates on bases that fairly assign or allocate the costs and benefits of these sales and purchases; and (d) allow for capacity transactions as needed and available between the Operating Companies;

WHEREAS, the achievement of the foregoing will be facilitated by the performance of certain services by an Agent;

WHEREAS, AEPSC is the service company affiliate of APC, I&M and KPC and as such performs a variety of services on their behalf in accordance with applicable rules and regulations of the Federal Energy Regulatory Commission ("FERC"); and

WHEREAS, AEPSC is willing to serve as Agent to APC, I&M and KPC under this Agreement with respect to generation-related activities.

NOW, THEREFORE, in consideration of the premises and the mutual covenants and agreements herein set forth, the Parties mutually agree as follows:

ARTICLE I

DEFINITIONS

1.1 AEPSC means American Electric Power Service Corporation, a wholly-owned subsidiary of American Electric Power Company, Inc. and a service company affiliate of APC, I&M and KPC.

1.2 Agent means the Operating Companies' designated representative for the purposes specified in Article V and elsewhere in this Agreement. The Agent will be AEPSC.

1.3 Agreement means this Power Cost Sharing Agreement among APC, I&M, KPC and AEPSC, including all Service Schedules and attachments hereto, as it may be amended from time to time.

1.4 APC means Appalachian Power Company.

1.5 Avoided Cost means the costs avoided by an Operating Company by reason of its purchase of an incremental amount of energy from another Operating Company. Such costs shall be defined as the costs that otherwise would have been paid for Spot Market energy in the relevant market(s) operated by the applicable regional transmission organization.

1.6 FERC means the Federal Energy Regulatory Commission or any successor agency having jurisdiction over this Agreement.

1.7 I&M means Indiana Michigan Power Company.

1.8 Industry Standards means all applicable national and regional electric reliability council and regional transmission organization principles, guides, criteria, standards and practices.

1.9 Interconnection Points shall have the meaning set forth in the third clause of this Agreement.

1.10 Internal Load means all sales of energy by an Operating Company to its Retail Customers and Wholesale Requirements Customers, including losses. Internal Load is principally characterized by the Operating Company assuming the load obligation as its own power commitment, as opposed to Off-System Sales.

1.11 KPC means Kentucky Power Company.

1.12 Off-System Sales means all power sales by an Operating Company other than sales to the Retail Customers and Wholesale Requirements Customers that comprise the Operating Company's Internal Load.

1.13 Off-System Purchases means power purchases by an Operating Company for any of the following reasons: (a) to reduce power supply costs, (b) to serve load requirements, c) to provide reliability of supply, (d) to satisfy state specific requirements or goals or (e) to engage in Off-System Sales.

1.14 Operating Committee means the administrative body established pursuant to Article VI for the purposes therein specified.

1.15 Operating Companies means APC, I&M and KPC collectively.

1.16 Operating Company means APC, I&M or KPC individually.

1.17 Party or Parties means one or more of the following, individually or collectively, as the context warrants: APC, I&M, KPC and Agent.

1.18 Retail Customer for purposes of this Agreement means a retail power customer on whose behalf an Operating Company has undertaken an obligation to obtain power supply resources so as to supply electricity to reliably meet the electric needs of such customer.

1.19 Service Schedules means the Service Schedules attached to this Agreement and those that later may be agreed to by the Parties and accepted for filing by FERC, as they may be amended from time to time.

1.20 Spot Market(s) means the day ahead, real time (balancing) or similar short-term energy market(s) operated by the applicable regional transmission organization(s), typically characterized by energy that is selected and delivered on an hourly, or more frequent, basis in that same day or the next calendar day.

1.21 Surplus Energy means energy supplied by one Operating Company to another, for the purchasing Operating Company to meet its Internal Load requirement at less than the purchasing Operating Company's Avoided Cost.

1.22 Surplus Energy Incremental Cost means any costs incurred by an Operating Company by reason of its provision of an incremental amount of energy to another Operating Company for its Internal Load. Such costs may include, but are not limited to, costs for fuel, reactive power, operation, maintenance, start-up, fuel handling, chemicals, consumables, emission allowances and taxes; transmission and ancillary service charges, including congestion, transmission losses, and any other incremental costs as allocated from an applicable regional transmission organization; charges for any power and energy purchased that is reasonably assigned or allocated by the Agent to such supply; and other incremental expenses incurred in providing energy from one Operating Company to another Operating Company. Such costs will normally exclude costs associated with resources dispatched for non-economic reasons, for minimum operating requirements and those dedicated to the selling Operating Company's Internal Load.

1.23 System Emergency means a condition which, if not promptly corrected, threatens to cause imminent harm to persons or property, including the equipment of a Party or a Third Party, or threatens the reliability of electric service provided by an Operating Company to Retail Customers or Wholesale Requirements Customers.

1.24 Third Party or Third Parties means an entity or entities that are not a Party or Parties as defined in this Agreement.

1.25 Wholesale Requirements Customer means a wholesale customer whose loads are served by an Operating Company that has undertaken, by contract, an obligation to serve

such customer's partial or full requirements load and to acquire power supply resources and other resources necessary to meet such requirements.

ARTICLE II

TERM OF AGREEMENT

2.1 Term and Withdrawal

Subject to FERC approval or acceptance for filing, this Agreement shall take effect on the date permitted by FERC, and shall continue in full force and effect until terminated: (a) by mutual agreement or (b) upon no less than twelve (12) months' written notice by one Party to each of the other Parties, after which time the notifying Party will be withdrawn from the Agreement and the Agreement will continue in full force and effect for the remaining Parties except for such modifications necessary to remove the withdrawn Party.

ARTICLE III

OBJECTIVES

3.1 Purpose

The purpose of this Agreement is to provide a contractual basis for coordinating the operation and maintenance of the power supply resources of the Operating Companies to achieve economies and efficiencies consistent with the provision of reliable electric service and an equitable sharing of the benefits and costs of such coordinated arrangements. This Agreement is based on the premise that each Operating Company will maintain sufficient long-term power supply resources to meet its Internal Load requirements.

ARTICLE IV

SCOPE AND RELATIONSHIP TO OTHER AGREEMENTS

AND SERVICES

4.1 Scope

The transactions governed by this Agreement are subject to, and may be limited from time to time by applicable state and federal laws, and the regulations, rules, and orders of applicable regulatory agencies regarding the purchase and sale of energy and/or capacity among affiliates. This Agreement is not intended to preclude the Parties from entering into other arrangements between or among themselves or with Third Parties. This Agreement is intended to operate in addition to, not in lieu of, power market transactions and settlements that occur between each Operating Company or the Operating Companies collectively and any applicable regional transmission organizations.

4.2 Transmission

This Agreement is intended to apply to the coordination of the power supply resources of, and loads served by, the Operating Companies. It is not intended to apply to the coordination of transmission facilities owned or operated by the Operating Companies.

ARTICLE V

AGENT

5.1 Agent's Functions

Subject to the direction of the Operating Committee, Agent agrees to:

- (a) assist in evaluations concerning power supply resource additions to be installed or acquired by one or more Operating Companies to meet load requirements;

- (b) assist in the coordination of the operation and maintenance of the Operating Companies' respective power supply resources;
- (c) administer the participation and financial settlement of the Operating Companies in the power markets of the applicable regional transmission organization;
- (d) conduct Off-System Purchases and Off-System Sales on behalf of one or more Operating Companies;
- (e) prepare and deliver to the Parties a monthly settlement statement and make available as requested supporting details for any Party to inspect for a period time not to exceed three (3) years from the date expenses were incurred or revenues received;
- (f) acquire and coordinate transmission and ancillary services from affiliated and non-affiliated transmission providers for use with respect to transactions between or among Operating Companies under this Agreement, Off-System Purchases and Off-System Sales;
- (g) assist in the coordination of the Operating Companies' procurement of, but not necessarily limited to, fuel, consumables, emission allowances and transportation services; and
- (h) perform such other activities and duties as may be requested from time to time by a Party or Parties.

5.2 Appointment and Acceptance of Authority; Delegation of Duties

5.2 (a) Appointment of Agent

As of the effective date of this Agreement as specified in Section 2.0, the Operating Companies delegate to AEPSC as the Agent and AEPSC, as the Agent, hereby accepts

responsibility and authority for the duties listed in Section 5.1 and elsewhere in this Agreement and shall perform each of those duties under the direction of the Parties.

5.2 (b) Delegation of Duties

With the prior written consent of the other Parties, AEPSC may assign all or a part of its responsibilities under this Agreement to another entity.

ARTICLE VI

**COMPOSITION AND DUTIES OF
THE OPERATING COMMITTEE**

6.1 Operating Committee

The Operating Committee is the administrative body created to administer this Agreement and shall consist of four (4) members. One member shall be a representative of APC, one member shall be a representative of I&M, one member shall be a representative of KPC, and the fourth member shall be a representative of the Agent. The Agent's representative shall act as the chairman of the Operating Committee and shall be known as the "PCS Manager". With respect to all duties and decisions, the Operating Committee will take such action as reasonably necessary to permit each of the Operating Companies to fulfill its reliability obligations.

6.2 Meeting Dates

The Operating Committee shall hold meetings at such times, means, and places as the members shall determine from time to time. Minutes of each Operating Committee meeting shall be prepared and maintained.

6.3 Decisions

All decisions of the Operating Committee shall be by a simple majority vote of the members, including proxies.

6.4 Duties

The Operating Committee shall have the duties listed below, unless such duties are otherwise assigned by a vote of the Operating Committee to the Agent, in which case the Agent shall perform such duties:

- (a) reviewing and providing direction concerning the equitable sharing of costs and benefits under this Agreement among the Operating Companies;
- (b) administering and interpreting this Agreement and making any amendments hereto, subject to any necessary regulatory approvals, including such amendments that are proposed in response to a change in regulatory requirements applicable to one or more of the Operating Companies or changes concerning an applicable regional transmission organization;
- (c) reviewing and, if necessary, amending the duties and responsibilities of the Agent; and
- (d) ensuring coordination for other matters not specifically provided for herein that the Operating Committee considers necessary to the reliable and economic use of each Operating Company's power supply resources.

In the event that an action of the Operating Committee results in a change to the settlement process(es) among the Operating Companies, such modified settlement will normally occur on a prospective basis only, which may include past billing periods back to the beginning of the first full billing month preceding the date of action of the Operating Committee. Such modifications will be subject to the terms of Article IX as applicable.

ARTICLE VII

OPERATING COMPANY PLANNING AND OPERATIONS

7.1 Operating Company and System Planning

Each Operating Company, with support from the Agent, will be individually responsible for its own capacity planning. Each Operating Company will be responsible for maintaining an adequate level of generation resources to meet its own Internal Load requirements for capacity and energy, including any required reserve margins, and shall bear all of the resulting costs.

The Agent shall assess the adequacy of the power supply resources of the Operating Companies from the perspective of each Operating Company and the Operating Companies collectively, taking into account reserve requirements, capacity status in the applicable regional transmission organization, state-integrated resource plans as applicable, each Operating Company's load forecast, changing regulatory structures and requirements and all other criteria applicable by law or regulation to each Operating Company. The Agent will subsequently make recommendations to each Operating Company regarding the need for additional power supply resources. In making this evaluation, the Agent, in conjunction with each Operating Company, will assess whether economies and efficiencies may be achieved by selecting common power supply resources for more than one Operating Company, subject to regulatory, transmission, economic, and operational constraints and approvals.

Similarly, the Agent, under the direction of the Operating Committee, will assess and make recommendations to each Operating Company as to whether that Operating Company has power supply resources in excess of its needs (short-term or long-term) that could be made available to the other Operating Companies or Third Parties.

Transactions among the Operating Companies for sales and purchases of capacity under this Agreement shall be made as described under Service Schedule A. Notwithstanding any of the foregoing, the actual addition or disposition of power supply resources will be conditioned on compliance with all applicable state and other regulatory requirements and requirements of any applicable regional transmission organization.

7.2 Generation Resource Outage Planning

The Agent, on behalf of the Operating Companies, will coordinate the scheduling of planned generation resource outages in order to support reliability and manage costs.

7.3 Generation Resource Dispatch

The generation resources of each of the Operating Companies will be dispatched by the Agent under the direction of the applicable regional transmission organization.

7.4 Regional Transmission Organization Transactions

Each Operating Company shall be individually responsible for charges it incurs and credits it receives due to its participation in the power markets of a regional transmission organization. Such costs and revenues will be assigned or allocated directly by the regional transmission organization or its agent where practical. The Operating Companies may collectively participate from time to time in specific markets of the regional transmission organization or to meet certain regional transmission or reliability organization requirements, in which case the allocation of resulting revenues and/or costs, if any, will be allocated as specified herein or as otherwise approved by the Operating Committee.

Notwithstanding the foregoing, in the event that two or more Operating Companies collectively participate in the capacity market of an applicable regional transmission organization, meaning that such Operating Companies' resources and load obligations are combined and administered collectively to participate in and satisfy the reliability requirements

of the applicable regional transmission organization's capacity market, such participation will be administered and financially settled as described under Schedule A.

7.5 Capacity Purchases and Sales with Third Parties

Capacity purchases and capacity sales initiated at the direction of an Operating Company will be directly assigned to that Operating Company whenever reasonably possible.

Any purchases of capacity from a Third Party not directly assigned to an Operating Company will normally be allocated to the Operating Company or Operating Companies with the lowest capacity reserve margin(s) over the applicable period at the time of the transaction.

Any sales of capacity to a Third Party not directly assigned to an Operating Company will normally be allocated among the Operating Companies based upon the Megawatts (MW) of capacity resources each Operating Company has in excess of its capacity obligations and commitments over the applicable period at the time of the transaction.

Notwithstanding the foregoing, capacity purchases and sales that occur under the auction processes of the applicable regional transmission organization will be directly assigned to a specific Operating Company based on the results of such auctions or, if two or more Operating Companies are collectively participating in the regional transmission organization's capacity market, capacity purchases and sales will be allocated to such Operating Companies as specified under Schedule A.

7.6 Energy Purchases and Sales with Third Parties

Any energy purchased from, or sold to, a Third Party that is specifically associated with and resulting from capacity allocated in Section 7.5 will be assigned to the purchaser of the capacity.

Energy purchases and sales initiated at the direction of an Operating Company will be directly assigned to that Operating Company whenever reasonably possible.

Any energy purchases from a Third Party not directly assigned to an Operating Company will be allocated among the Operating Companies based on each Operating Company's Internal Load.

Any energy sales to a Third Party not directly assigned to an Operating Company will be allocated among the Operating Companies based upon each Operating Company's hourly energy surplus, as measured by taking the actual hourly output of each Operating Company's resources, including purchases other than Spot Market purchases, and subtracting the Operating Company's Surplus Energy sales and Internal Load, but in no event shall be less than zero (0).

7.7 Surplus Energy Sales between Operating Companies

An Operating Company will make Surplus Energy available from its power supply resources to another Operating Company for the purposes and to the extent provided by this Agreement as further described under Schedule B.

7.8 Emergency Response

In the event of a System Emergency, no adverse distinction shall be made between the customers of any of the Operating Companies. Each Operating Company shall, under the direction of the regional transmission organization, make its power supply resources available in response to a System Emergency. Notwithstanding the foregoing, it is understood that transmission constraints or other factors may limit the ability of an Operating Company to respond to a System Emergency.

ARTICLE VIII

ASSIGNMENT OF COSTS AND BENEFITS OF COORDINATED OPERATIONS

8.1 Service Schedules

The costs and revenues associated with coordinated operations as described in Article VII shall be distributed among the Operating Companies in the manner provided in the Service Schedules utilizing the billing procedures described in Article IX. It is understood and agreed that all such Service Schedules are intended to establish an equitable sharing of costs and/or benefits among the Operating Companies, and that circumstances may, from time to time, require a reassessment of the relative costs and benefits of this Agreement, or of the methods used to apportion costs and benefits of the Service Schedules. Upon an action of the Operating Committee, any of the Service Schedules may be amended as of any date agreed to by the Operating Committee by majority vote, subject to the receipt of any necessary regulatory authorizations.

ARTICLE IX

BILLING PROCEDURES

9.1 Records

The Agent shall maintain such records as may be necessary to determine the assignment of costs and revenues of coordinated operations pursuant to this Agreement. Such records shall be made available to the Parties upon request for a period not to exceed three (3) years.

9.2 Monthly Statements

As promptly as practicable after the end of each calendar month, the Agent shall prepare a statement setting forth the monthly summary of costs and revenues allocated or assigned to the Operating Companies in sufficient detail as may be needed for settlements under the provisions of this Agreement. As required, the Agent may provide such statements on an estimated basis and then adjust those statements for actual results.

9.3 Billings and Payments

The Agent shall be responsible for all billing between the Operating Companies and other entities with which they engage in Off-System Purchases and Off-System Sales pursuant to this Agreement. Payments among the Operating Companies shall be made by remittance of the net amount billed or by making appropriate accounting entries on the books of the Parties. The entire amount shall be paid when due.

9.4 Taxes

Should any federal, state, or local tax, surcharge or similar assessment, in addition to those that may now exist, be levied upon the electric capacity, energy, or services to be provided in connection with this Agreement, or upon the provider of service as measured by the electric capacity, energy, or services, or the revenue therefrom, such additional amount shall be included in the net billing described in Section 9.3.

9.5 Billing Errors

If the Agent discovers a billing error pertaining to a prior billing for reasons including, but not limited to, missing or erroneous data or calculations, including those caused by meter, computer or human error, a correction adjustment will be calculated. Except as the Operating Committee may authorize in the exercise of reasonable discretion, the correction adjustment shall not be applied to any period earlier than the beginning of the first full billing

month preceding the discovery of the error, nor will interest accrue on such adjustment. The correction adjustment will be applied as soon as practicable to the next subsequent regular monthly bill. Any overpaid amount attributed to such billing errors shall be returned by the owing Party upon determination of the correct amount with no interest.

9.6 Billing Omissions

If a Party's records reveal that a bill was not delivered, then the Agent may deliver to the appropriate Party a bill within one (1) year from the date on which the bill should have been delivered. Any amounts collected or reimbursed due to such omissions shall exclude interest. The right to payment is waived with respect to any amounts not billed within such a one (1) year period.

9.7 Billing Disputes

The Parties shall have the right to dispute the accuracy of any bill or payment for a period not to exceed one month from the date on which the bill was initially delivered. Following this one-month period, the right to dispute a bill is permanently waived for any and all reasons including but not limited to, (a) errors, (b) omissions, (c) Agent's actions, and (d) the Operating Committee's decisions, Agreement interpretations and direction in the administration of the Agreement. Any amounts collected or reimbursed due to such disputes shall exclude interest.

ARTICLE X

FORCE MAJEURE

10.1 Events Excusing Performance

No Party shall be liable to another Party for or on account of any loss, damage, injury, or expense resulting from or arising out of a delay or failure to perform, either in whole or

in part, any of the agreements, covenants, or obligations made by or imposed upon the Parties by this Agreement, by reason of or through strike, work stoppage of labor, failure of contractors or suppliers of materials (including fuel, consumables or other goods and services), failure of equipment, environmental restrictions, riot, fire, flood, ice, invasion, civil war, commotion, insurrection, military or usurped power, order of any court or regulatory agency granted in any *bona fide* legal proceedings or action, or of any civil or military authority either *de facto* or *de jure*, explosion, Act of God or the public enemies, or any other cause reasonably beyond its control and not attributable to its neglect. A Party experiencing such a delay or failure to perform shall use due diligence to remove the cause or causes thereof; however, no Party shall be required to add to, modify or upgrade any facilities, or to settle a strike or labor dispute except when, according to its own best judgment, such action is advisable.

ARTICLE XI

DELIVERY POINTS

11.1 Delivery Points

All electric energy delivered under this Agreement shall be of the character commonly known as three-phase sixty-cycle energy, and shall be delivered at the various Interconnection Points where the transmission systems of the Operating Companies are interconnected, either directly or through transmission facilities of third parties, at the nominal unregulated voltage designated for such points, and at such other points and voltages as may be determined and agreed upon by the Operating Companies.

ARTICLE XII

GENERAL

12.1 Adherence to Industry Standards

The Parties agree to make their best efforts to conform to Industry Standards as they affect the implementation of and conduct pertaining to this Agreement.

12.2 No Third Party Beneficiaries

This Agreement does not create rights of any character whatsoever in favor of any person, corporation, association, entity or power supplier, other than the Parties, and the obligations herein assumed by the Parties are solely for the use and benefit of the Parties. Nothing in this Agreement shall be construed as permitting or vesting, or attempting to permit or vest, in any person, corporation, association, entity or power supplier, other than the Parties, any rights hereunder or in any of the resources or facilities owned or controlled by the Parties or the use thereof.

12.3 Waivers

Any waiver at any time by a Party of its rights with respect to a default under this Agreement, or with respect to any other matter arising in connection with this Agreement, shall not be deemed a waiver with respect to any subsequent default or matter. Any delay, short of the statutory period of limitation, in asserting or enforcing any right under this Agreement, shall not be deemed a waiver of such right.

12.4 Successors and Assigns

This Agreement shall inure to the benefit of and be binding upon the Parties only, and their respective successors and assigns, and shall not be assignable by any Party without the written consent of the other Parties except to a successor in the operation of its properties by reason of a reorganization to comply with state or federal restructuring requirements, or a

merger, consolidation, sale or foreclosure whereby substantially all such properties are acquired by or merged with those of such a successor.

12.5 Liability and Indemnification

SUBJECT TO ANY APPLICABLE STATE OR FEDERAL LAW THAT MAY SPECIFICALLY RESTRICT LIMITATIONS ON LIABILITY, EACH PARTY SHALL RELEASE, INDEMNIFY, AND HOLD HARMLESS THE OTHER PARTIES, THEIR DIRECTORS, OFFICERS AND EMPLOYEES FROM AND AGAINST ANY AND ALL LIABILITY FOR LOSS, DAMAGE OR EXPENSE ALLEGED TO ARISE FROM, OR BE INCIDENTAL TO, INJURY TO PERSONS AND/OR DAMAGE TO PROPERTY IN CONNECTION WITH ITS FACILITIES OR THE PRODUCTION OF TRANSMISSION OF ELECTRIC ENERGY BY OR THROUGH SUCH FACILITIES, OR RELATED TO PERFORMANCE OR NON-PERFORMANCE OF THIS AGREEMENT, INCLUDING ANY NEGLIGENCE ARISING HEREUNDER. IN NO EVENT SHALL ANY PARTY BE LIABLE TO ANOTHER PARTY FOR ANY INDIRECT, SPECIAL, INCIDENTAL, OR CONSEQUENTIAL DAMAGES WITH RESPECT TO ANY CLAIM ARISING OUT OF THIS AGREEMENT.

12.6 Headings

The descriptive headings of the Articles, Sections and Service Schedules of this Agreement are used for convenience only, and shall not modify or restrict any of the terms and provisions thereof.

12.7 Notice

Any notice or demand for performance required or permitted under any of the provisions of this Agreement shall be deemed to have been given on the date such notice, in

writing, is deposited in the U.S. mail, postage prepaid, certified or registered mail, addressed to the Parties at the addresses specified below:

Appalachian Power Company
1 Riverside Plaza
Columbus, Ohio 43215

Indiana Michigan Power Company
1 Riverside Plaza
Columbus, Ohio 43215

Kentucky Power Company
1 Riverside Plaza
Columbus, Ohio 43215

AEP Service Corporation
1 Riverside Plaza
Columbus, Ohio 43215

or in such other form or to such other address as the Parties may stipulate.

ARTICLE XIII

REGULATORY APPROVAL

13.1 Regulatory Authorization

This Agreement is subject to and conditioned upon its approval or acceptance for filing without material condition or modification by the FERC. In the event that this Agreement is not so approved or accepted for filing in its entirety or without conditions or modifications unacceptable to any Party, or the FERC subsequently modifies this Agreement upon complaint or upon its own initiative (as provided for in Section 13.2), any Party may, irrespective of the notice provisions in Section 2.1, withdraw from this Agreement by giving thirty (30) days' advance written notice to the other Parties.

13.2 Changes

It is contemplated by the Parties that it may be appropriate from time to time to change, amend, modify, or supplement this Agreement, including the Service Schedules and any other attachments that may be made a part of this Agreement, to reflect changes in operating practices or costs of operations or for other reasons. Any such changes to this Agreement shall be in writing executed by the Parties and subject to approval or acceptance for filing by the FERC.

It is the intent of the Parties that, to the maximum extent permitted by law, the provisions of this Agreement shall not be subject to change under Sections 205 and 206 absent the written agreement of the Parties, and that the standard of review for changes unilaterally proposed by a Party, a Third Party, or the Commission, acting sua sponte or at the request of a Third Party, shall be the public interest standard of review set forth in *United Gas Pipe Line Co. v. Mobile Gas Service Corp.*, 350 U.S. 332 (1956), *Federal Power Commission v. Sierra Pacific Power Co.*, 350 U.S. 348 (1956), *Morgan Stanley Capital Group, Inc. v. Public Utility District No. 1 of Snohomish County*, 128 S.Ct. 2733 (2008), and *NRG Power Marketing, LLC v. Maine Public Utilities Commission*, 130 S.Ct. 693 (2010).

IN WITNESS WHEREOF, the Parties have caused this Agreement to be executed and attested by their duly authorized officers on the day and year first above written.

APPALACHIAN POWER COMPANY

By: _____

Title: _____

INDIANA MICHIGAN POWER COMPANY

By: _____

Title: _____

KENTUCKY POWER COMPANY

By: _____

Title: _____

AMERICAN ELECTRIC POWER SERVICE CORPORATION

By: _____

Title: _____

SERVICE SCHEDULE A

COLLECTIVE PARTICIPATION IN THE APPLICABLE REGIONAL TRANSMISSION ORGANIZATION CAPACITY MARKET

A1– Duration

This Service Schedule A shall become effective and binding when the Agreement of which it is a part becomes effective, and shall continue in full force and effect throughout the duration of the Agreement unless terminated or suspended.

A2 – Availability of Service

This Service Schedule A governs the administration and settlement of capacity during such times that multiple Operating Companies are participating, on a collective basis, in the capacity market of the applicable regional transmission organization as specified under Section 7.4.

A3 – Capacity Sales between Operating Companies

When an Operating Company is expected to have surplus capacity and another Operating Company has capacity that is expected to be insufficient or marginal in terms of meeting its capacity obligations during one or more future regional transmission organization planning years, the Agent shall evaluate the feasibility of a capacity transaction between the Operating Companies. Such evaluations shall take into account the rules, requirements and financial implications of the applicable regional transmission organization.

If such a transaction is recommended by the Agent and approved by the affected Operating Companies, the transaction will be for one or more specific future regional transmission organization planning years.

The Capacity Transfer Price for any such transaction shall be the prevailing market price, defined as the applicable regional transmission organization's most recent capacity auction

clearing price for the delivery year or delivery years for which such an auction has already occurred.

If, for a given delivery year, such an auction has not yet occurred, the Capacity Transfer Price shall be the clearing price that results from the first such auction for the applicable delivery year(s). Such transactions do not provide the purchaser with any entitlements to energy associated with this capacity.

All other capacity transactions between the Operating Companies will be made under such terms and at a Capacity Transfer Price that is mutually agreeable to the Operating Companies and subject to any necessary regulatory approvals.

A4 – Auction Sales Revenues

Any revenues resulting from capacity sold into the applicable regional transmission organization's planning year(s) capacity auction will be allocated among the Operating Companies based upon the Megawatts (MWs) of capacity resources each Operating Company has in excess of its capacity obligations and commitments over such planning year(s) at the time the auction occurs. Such allocation will occur regardless of which actual units of the Operating Companies are cleared and/or designated to fulfill the auction commitment.

A5 – Delivery Year and Post-Delivery Year Settlement

During a given regional transmission organization planning year, i.e., the delivery year, the Agent will manage the capacity resources needed to meet the combined Operating Companies' capacity obligations and commitments to the regional transmission organization.

If capacity resource performance charges are assessed by the regional transmission organization for a given delivery year, the total net charge will be allocated among the Operating Companies based upon each Operating Company's contribution to the total charge.

Each Operating Company's contribution to the total charge will be determined by computing a total MW position for each Operating Company by subtracting its total capacity obligation in MWs from its total capacity resources in MWs. This result will be further adjusted by adding or subtracting as applicable the net total MWs of actual under-performance or over-performance of each Operating Company's capacity resources during the delivery year as computed by the regional transmission organization.

Any Operating Company with a resulting net short MW position, meaning that their capacity obligation MWs are greater than their capacity resource MWs including any MWs of over-performance or under-performance, will be allocated a share of the total net performance charge from the regional transmission organization based on the Operating Company's net short MW position.

If the total net charge assessed by the regional transmission organization is greater than zero, such calculations and the corresponding allocation will be made following the end of the applicable delivery year.

If a total net charge is assessed by the regional transmission organization is greater than zero, even though each Operating Company has a computed contribution of zero (0) as described above, the total net charge will be allocated utilizing each Operating Company's delivery year capacity obligation MWs.

SERVICE SCHEDULE B SURPLUS ENERGY SALES

B1 – Duration

This Service Schedule B shall become effective and binding when the Agreement of which it is a part becomes effective, and shall continue in full force and effect throughout the duration of the Agreement unless terminated or suspended.

B2 – Availability of Service

This Service Schedule B governs sales of energy made pursuant to Section 7.7 of the Agreement, which are sales of energy not associated with sales of capacity. Surplus Energy sales shall be as defined in Section 1.21. Such sales will be made only in hours in which the Internal Load of an Operating Company (“Purchaser”) exceeds the actual output of its generation resources, including any assigned purchases and the Purchaser’s allocation of system purchases, as described in Section 7.6, but excluding Spot Market purchases.

If such a condition exists, the available Surplus Energy is the hourly amount in MegaWatt-hours (“MWhs”) that an Operating Company’s (“Seller’s”) generation resources, including any assigned purchases and Seller’s allocation of off system purchases, excluding any Spot Market purchases, exceeds the sum of the Seller’s Internal Load requirements and assigned Off System Sales.

To the extent that such Surplus Energy is available, the Surplus Energy Transfer Price will be computed, and the Surplus Energy Sale will then occur if the Surplus Energy Transfer Price as described in Section B3 is less than the Avoided Cost of the Purchaser. The hourly sales of Surplus Energy MWhs will be limited to the lesser of (a) the amount of Surplus Energy

available from the Seller(s) or (b) the amount required to fulfill the Internal Load deficit of the Purchaser(s).

B3 – Surplus Energy Price

For any sale that occurs in accordance with Section B2, the Purchaser shall pay the Seller the Surplus Energy Price (“SEP”), defined as the following:

SEP = One-half the sum of (a) the Seller’s Surplus Energy Incremental Cost Rate and
(b) the Purchaser’s Avoided Cost Rate

Where:

(a) the Seller’s Surplus Energy Incremental Cost Rate is the Seller’s Surplus Energy Incremental Costs associated with all of the Seller’s hourly available Surplus Energy, expressed in total dollars divided by the MWhs of all such available Surplus Energy; and

(b) the Purchaser’s Avoided Cost Rate is the hourly Avoided Cost expressed in dollars per MWh.

The resulting SEP, expressed in dollars per MWh, is multiplied by the total Surplus Energy MWhs sold to determine the amount of Surplus Energy purchased.

B4 – General

No Surplus Energy transaction will occur in an hour if the SEP equals or exceeds the Purchaser’s Avoided Cost Rate. Surplus Energy sales that occur in hours between multiple Purchasers and/or multiple Sellers shall be allocated based on the respective available Surplus Energy MWhs of the Sellers and the respective Internal Load deficit MWhs of the Purchasers.

KENTUCKY POWER COMPANY

RATE SCHEDULE NO. 200

Joint Tariff Common Name: "Power Cost Sharing Agreement among Appalachian Power Company, Indiana Michigan Power Company, Kentucky Power Company and American Electric Power Service Corporation"

Designated Filing Company: Appalachian Power Company (APCo)

Designated Filing Company Tariff Title: APCo Rate Schedules and Service Agreements Tariffs

Designated Filing Company Tariff Program: FPA (Cost Based)

Designated Filing Company Tariff Record Adopted by Reference (Record Content Description/Tariff Record Title): Rate Schedule No. 200, Power Cost Sharing Agreement.

Description of Tariff: Rate Schedule under which APCo, Indiana Michigan Power Company, Kentucky Power Company, and American Electric Power Service Corporation (in an agency role) arrange internal energy and capacity transactions.

INDIANA MICHIGAN POWER COMPANY

RATE SCHEDULE NO. 200

Joint Tariff Common Name: "Power Cost Sharing Agreement among Appalachian Power Company, Indiana Michigan Power Company, Kentucky Power Company and American Electric Power Service Corporation"

Designated Filing Company: Appalachian Power Company (APCo)

Designated Filing Company Tariff Title: APCo Rate Schedules and Service Agreements Tariffs

Designated Filing Company Tariff Program: FPA (Cost Based)

Designated Filing Company Tariff Record Adopted by Reference (Record Content Description/Tariff Record Title): Rate Schedule No. 200, Power Cost Sharing Agreement.

Description of Tariff: Rate Schedule under which APCo, Indiana Michigan Power Company, Kentucky Power Company, and American Electric Power Service Corporation (in an agency role) arrange internal energy and capacity transactions.

Attachment B

Bridge Agreement Among Appalachian Power Company, Indiana Michigan Power Company, Kentucky Power Company, Ohio Power Company, AEP Generation Resources Inc. and American Electric Power Service Corporation as Agent

1. Tariff Record, APCo – FERC Rate Schedule No. 201
2. Tariff Record, KPCo – FERC Rate Schedule No. 201
3. Tariff Record, I&M – FERC Rate Schedule No. 201
4. Tariff Record, AEP Generation Resources Inc. – FERC Rate Schedule No. 2
5. Tariff Record, OPCo – FERC Rate Schedule No. 200

RATE SCHEDULE No. 201

BRIDGE AGREEMENT

among

**APPALACHIAN POWER COMPANY,
INDIANA MICHIGAN POWER COMPANY,
KENTUCKY POWER COMPANY,
OHIO POWER COMPANY,
AEP GENERATION RESOURCES INC.**

and

AMERICAN ELECTRIC POWER SERVICE CORPORATION

as Agent

BRIDGE AGREEMENT

THIS AGREEMENT is made and entered into as of this ___ day of _____, 2013, by and among Appalachian Power Company (“APCo”), Indiana Michigan Power Company (“I&M”), Kentucky Power Company (“KPCo”), Ohio Power Company (“OPCo” and, collectively with APCo, I&M and KPCo, the “Operating Companies”), AEP Generation Resources Inc. (“AEP Generation Resources”) and American Electric Power Service Corporation (“Agent” and, collectively with APCo, I&M, KPCo, OPCo and AEP Generation Resources, the “Parties”).

RECITALS:

WHEREAS, the Operating Companies are each wholly-owned subsidiaries of American Electric Power Company, Inc. (“AEP”) and members of the Interconnection Agreement (“Pool Agreement”), which has been in effect since 1951;

WHEREAS, each member of the Pool Agreement has provided notice to the other members (and to the Agent) that it will terminate its participation in the Pool Agreement in accordance with the termination provisions thereof;

WHEREAS, pursuant to the Pool Agreement, the Operating Companies have made joint wholesale purchases and sales of physical power (at market based rates), and of financial power, for the purpose of hedging the output of the Operating Companies’ generation assets, some of which will not expire until after the Pool Agreement terminates (“Legacy Hedge Contracts”);

WHEREAS, in addition to the Legacy Hedge Contracts, the Operating Companies have made other joint wholesale purchases and sales of physical power (at market based rates), and of financial power and related commodities, pursuant to the Pool Agreement under joint purchase and sale contracts, some of which will also not expire until after the Pool Agreement terminates (collectively the “Legacy Trading Contracts”);

WHEREAS, the Operating Companies desire to jointly share in the gains and losses resulting from the settlement and liquidation in the market of the Legacy Hedge Contracts and Legacy Trading Contracts (collectively, the “Legacy Off-System Sales Portfolio”);

WHEREAS, the Operating Companies have previously elected to fulfill their capacity obligations to PJM pursuant to the Fixed Resource Requirement (“FRR”) alternative under the

PJM Reliability Assurance Agreement through and including Planning Year 2014/2015 (the "Operating Companies' FRR Obligation") and desire to continue to fulfill those obligations;

WHEREAS, the Public Utilities Commission of Ohio has authorized OPCo to conduct an internal corporate reorganization under which its generation and power marketing businesses will be separated from its transmission and distribution businesses consistent with Ohio restructuring law and OPCo's structural corporate separation plan;

WHEREAS, for the benefit of the Operating Companies, this Agreement commits the capacity resources of AEP Generation Resources, which it acquired from OPCo as a result of corporate separation and pursuant to the Asset Contribution Agreement, to fulfilling the Operating Companies' FRR Obligation through and including Planning Year 2014/2015; and

WHEREAS, pursuant OPCo's corporate separation plan and the terms of the Asset Contribution Agreement between OPCo and AEP Generation Resources, AEP Generation Resources will succeed to all of OPCo's right, title and interest in and to its generation and power marketing business (excepting the limited generation assets specifically retained by OPCo) and to all associated liabilities, including all of OPCo's allocations of (1) gains and losses from the Legacy Off-System Sales Portfolio (2) the Operating Companies' FRR Obligations and (3) FRR Charges and Credits and (4) all costs and liabilities associated with the foregoing, from which it will indemnify, defend and hold harmless OPCo pursuant to the terms of the Asset Contribution Agreement.

NOW, THEREFORE, in consideration of the premises and the mutual covenants and agreements herein set forth, the Parties mutually agree as follows:

ARTICLE I DEFINITIONS

1.1 Capacity Resources means, in respect of any Planning Year, the megawatts of net capacity from the Operating Companies and AEP Generation Resources eligible to satisfy the Operating Companies' FRR Obligation.

1.2 Capacity Requirement means, in respect of any Planning Year, the megawatts of net capacity from the Operating Companies and AEP Generation Resources required to satisfy the Operating Companies' FRR Obligation.

1.3 Commission means the Federal Energy Regulatory Commission.

1.4 Final MLR means, for each member of the Pool Agreement, the arithmetic average of the member's MLR for each of the twelve full calendar months preceding the termination of the Pool Agreement.

1.5 Member Demand means Member Load Obligation determined on a clock-hour integrated kilowatt basis, as set forth in Section 5.4 of the Pool Agreement.

1.6 Member Load Obligation means an Operating Company's internal load plus any firm power sales to un-affiliated and affiliated companies other than the Operating Companies, principally characterized by the Operating Company assuming the load obligation as its own firm power commitment and by the Operating Company retaining advantages accruing from meeting the load, as set forth in Section 5.2 of the Pool Agreement.

1.7 Member Load Ratio or MLR means the ratio of a particular Operating Company's Member Maximum Demand in effect for a calendar month to the sum of all of the Operating Companies' Member Maximum Demands in effect for such month, as set forth in Section 5.6 of the Pool Agreement.

1.8 Member Maximum Demand means the Member Maximum Demand in effect for a calendar month for a particular Operating Company, which shall be equal to the maximum Member Demand experienced by said Operating Company during the twelve consecutive calendar months next preceding such calendar month, as set forth in Section 5.5 of the Pool Agreement.

1.9 Operating Committee means the administrative body established pursuant to Article IV for the purposes therein specified.

1.10 PJM means PJM Interconnection, LLC, a regional transmission organization approved by the Commission.

1.11 Planning Year means each period of June 1 through May 31 of the following year during the term of this Agreement, in whole or in part, which period constitutes a planning year as defined by PJM.

1.12 FRR Charges and Credits means all PJM charges and credits arising from or relating to the Operating Companies' FRR Obligation, including but not limited to RPM auction revenues and cost of compliance with the Operating Companies' FRR Obligations under the PJM Reliability Assurance Agreement.

ARTICLE II
TERM OF AGREEMENT

2.1 **Term**. Subject to Commission approval or acceptance for filing, this Agreement shall take effect upon the effective date of the corporate separation of OPCo's generation and power marketing businesses from its transmission and distribution businesses and shall continue in full force and effect until the later of the settlement of the Legacy Off-System Sales Portfolio or the end of the Operating Companies' FRR Obligation under this Agreement, provided, however, that the Parties' obligations under Article V will only apply to the period starting on the effective date of this Agreement and ending May 31, 2015. The Agent will provide notice to the Operating Companies and AEP Generation Resources of the end of the term of this Agreement.

ARTICLE III
AGENT

3.1 **Delegation and Acceptance of Authority**. The Operating Companies and AEP Generation Resources hereby delegate to the Agent and the Agent hereby accepts responsibility and authority for the duties specified in this Agreement. Except as herein expressly established otherwise, the Agent shall perform each of those duties in consultation with the Operating Committee.

3.2 **Reporting**. The Agent shall provide periodic summary reports of its activities under this Agreement to the Parties and shall keep the Parties and the Operating Committee informed of situations or problems that may materially affect the outcome of these activities. Furthermore, the Agent agrees to report to the Parties and to the Operating Committee in such additional detail as is requested regarding specific issues or projects under its supervision as Agent. The Agent will carry out its responsibilities under this paragraph in accordance with the regulations of the Commission.

ARTICLE IV
OPERATING COMMITTEE

4.1 **Operating Committee**. By written notice to the other Parties, each Party shall name one representative ("Representative") and one alternate to act for it in matters pertaining to this Agreement and its implementation. A Party may change its Operating Representative or alternate at any time by written notice to the other Parties. The Operating Representatives of the respective Parties, or their alternates, shall comprise the Operating Committee. The Agent's

representative shall act as the chairman of the Operating Committee ("Chairman"). All decisions of the Operating Committee shall be by a simple majority vote of the Operating Representatives or their alternates, except that the Chairman shall vote only if the votes of the other Operating Representatives are equally divided.

4.2 Subcommittees. The Chairman, or any other Operating Representative, subject to a majority of the Operating Committee concurring, may create a subcommittee or working group of the Operating Committee ("Subcommittee"). Membership in a Subcommittee will be determined by the Operating Committee. Subcommittees shall perform the duties assigned to them and shall report to the Operating Committee on all matters referred to them. Actions of a Subcommittee shall be reported in the form of proposals or recommendations to the Operating Committee and shall have no force or binding effect except by action of the Operating Committee.

4.3 Meeting Dates. The Operating Committee and each Subcommittee thereof shall hold meetings at such times, means, and places as the members shall determine from time to time. Minutes of each Operating Committee and Subcommittee meeting shall be prepared and maintained.

4.4 Information for Use of the Agent. The Parties shall cooperate in providing to the Agent the information it reasonably requests and shall supplement or correct any such information on a timely basis.

ARTICLE V FRR OBLIGATION

5.1 Annual Capacity Resource Planning. Prior to each Planning Year, the Agent will analyze the impacts on the Operating Companies' FRR Obligation of projected and realized changes to Capacity Resources and Capacity Requirements and prepare a recommended Capacity Resource plan for the Operating Companies' FRR Obligation. The plan will describe whether additional Capacity Resources should be made available to the market and whether additional Capacity Resources should be procured for the applicable Planning Year. The portion of the Capacity Resource plan that applies to the Capacity Resources of the Operating Companies is subject to their unanimous written approval in consultation with the Agent. The portion of the Capacity Resource plan that applies to the Capacity Resources of AEP Generation Resources is subject to its written approval in consultation with the Agent. The Agent will have

no duty to provide to AEP Generation Resources any portion of the Capacity Resource plan that applies to the Capacity Resources of the Operating Companies. If a Capacity Resource plan submitted by the Agent is rejected by the Operating Companies or by AEP Generation Resources, then the Agent will revise and resubmit the plan in accordance with the foregoing procedures until the plan is accepted by both the Operating Companies and AEP Generation Resources.

5.2 Capacity Resource Plan Implementation. During each Planning Year, the Agent will collect Capacity Resource information from the Operating Companies and AEP Generation Resources and may alter the combination of Capacity Resources in the plan based on that information to maintain the Operating Companies' compliance with the PJM Reliability Assurance Agreement and to minimize compliance charges to the extent reasonably practicable. The Agent will implement the Capacity Resource plan for the Operating Companies' FRR Obligation, and any plan adjustments, with PJM. During each Planning Year, the Operating Companies and AEP Generation Resources will each perform testing of their Capacity Resources in accordance with the PJM Reliability Assurance Agreement and in consultation with the Agent.

5.3 Allocation of Capacity-Related Charges and Credits. The Agent will allocate PJM charges and credits associated with (1) Capacity Resource purchases and sales (excepting only those purchases and sales related to the generation assets specifically retained by OPCo) and (2) FRR Charges and Credits, among APCo, KPCo, I&M and AEP Generation Resources, as successor to the FRR obligations of OPCo, based on the Final MLR.

5.4 Other Agreements. The fulfillment of the Operating Companies' FRR Obligation, including the allocation of any associated charges and credits, for the Planning Years covered by this Article V, shall be governed by this Agreement and not by the Power Cost Sharing Agreement among APCo, KPCo, I&M and the Agent.

ARTICLE VI

LEGACY CONTRACTS

6.1 Legacy Trading Portfolio. The Agent will settle and liquidate the Legacy Trading Portfolio in the market in accordance with the terms of the Legacy Trading Contracts and Legacy Hedge Contracts.

6.1.1 Legacy Trading Contracts. The Agent shall allocate gains and losses arising from the settlement and liquidation of the Legacy Trading Contracts in the market

among APCo, KPCo, I&M and AEP Generation Resources, as successor to the generation-related obligations of OPCo, based on the Final MLR. The Agent may, from time to time, enter into new transactions on behalf of the Operating Companies that are dedicated to the portfolio of Legacy Trading Contracts with the intent of reducing the tenor and risk of that portfolio, and those additional transactions will also be deemed Legacy Trading Contracts, provided that the Agent will not enter into any such transaction whose term extends beyond the final delivery month of the portfolio of Legacy Trading Contracts on the effective date of this Agreement.

6.1.2 Legacy Hedge Contracts. The Agent shall allocate gains and losses arising from the settlement and liquidation of the Legacy Hedge Contracts in the market to (1) APCo, KPCo and I&M collectively (the "Integrated AEP-East Utilities") and (2) AEP Generation Resources, as successor to the generation-related obligations of OPCo, in a ratable manner based on the respective forecasted spot market energy sales of the Integrated AEP-East Utilities, collectively, and AEP Generation Resources, determined as of the effective date of this Agreement. The forecasted spot market energy sales for the Integrated AEP-East Utilities, collectively, and AEP Generation Resources will be calculated in monthly increments based on the forecasted output of their owned or contracted generation minus forecasted internal load. The forecasted internal load for the Integrated AEP-East Utilities is defined as the forecasted amount of megawatt-hours associated with their retail and firm wholesale loads in the aggregate, using the most recent forecast available as of the effective date of this Agreement. The forecasted internal load for AEP Generation Resources is defined as the forecasted amount of megawatt-hours to be provided by AEP Generation Resources to OPCo, under the Standard Service Offer Supply Agreement between those Parties, and to any non-Parties, under other firm wholesale contracts, if any, determined as of the effective date of this Agreement. The monthly forecasts will be calculated through and including the final delivery month of the portfolio of Legacy Hedge Contracts. Any allocation of gains and losses to the Integrated AEP-East Utilities will be shared among APCo, KPCo and I&M in a ratable manner based on their forecasted spot market energy sales. If the forecasted internal load of either the Integrated AEP-East Utilities or AEP Generation Resources exceeds the forecasted output of their respective owned or controlled generation for a

given month, then the Integrated AEP-East Utilities or AEP Generation Resources, as applicable, will not receive any allocation of gains or losses for that month, unless both are in this position in which case gains or losses will be allocated ratably among APCo, KPco, I&M and AEP Generation Resources in proportion to the forecasted output of their owned or contracted generation.

6.2 Legacy Trading Contracts Administration. The Agent will administer the scheduling, billing, settlement and liquidation in the market of the Legacy Off-System Sales Portfolio, and will provide such information, reports and position data to each Party as is requested regarding the Party's allocation of the Legacy Off-System Sales Portfolio. Any gains and losses arising from the liquidation of the Legacy Off-System Sales Portfolio shall be governed and allocated by this Agreement and not by the Power Cost Sharing Agreement among APCo, KPco, I&M and the Agent.

ARTICLE VII

BILLING PROCEDURES

7.1 Records. The Agent will maintain the records necessary to determine the allocation of all gains, losses, charges and credits under this Agreement. Such records shall be made available to the Operating Companies and to AEP Generation Resources upon request for a period not to exceed three (3) years.

7.2 Monthly Statements. As promptly as practicable after the end of each calendar month, the Agent shall prepare a statement setting forth the monthly summary of all gains, losses, charges and credits allocated or assigned to the Parties in sufficient detail as may be needed for settlements under the provisions of this Agreement. As required, the Agent may provide such statements on an estimated basis and then adjust those statements for actual results.

7.3 Billings and Payments. The Agent shall handle all billing between the Parties and non-Parties regarding the Legacy Contract Portfolio and the Operating Companies' FRR Obligation. Payments by the Operating Companies and AEP Generation Resources shall be made by remittance of the net amount billed to the applicable Party or by making appropriate accounting entries on the books of the Parties. The entire amount shall be paid when due.

7.4 Taxes. Should any federal, state, or local tax, surcharge or similar assessment, in addition to those that may now exist, be levied upon the services to be provided in connection

with this Agreement, or upon the provider of service as measured by the services or the revenue therefrom, such additional amount shall be included in the billing described in this Article VII.

7.5 Billing Errors. If the Agent or any other Party discovers a billing error pertaining to a prior billing for reasons including, but not limited to, billing omissions or missing or erroneous data or calculations (including those caused by meter, computer or human error), a corrective adjustment will be calculated by the Agent. Except as the Operating Committee may authorize in the exercise of reasonable discretion, the correction adjustment shall not be applied to any period earlier than the beginning of the first full billing month preceding the discovery of the error, nor will interest accrue on such adjustment. The corrective adjustment will be applied as soon as practicable to the next subsequent regular monthly bill. Any overpaid amount attributed to such billing errors shall be returned by the owing Party upon determination of the correct amount with no interest.

7.6 Billing Disputes. The Parties shall have the right to dispute the accuracy of any bill or payment for a period not to exceed one month from the date on which the bill was initially delivered. Following this one month period, the right to dispute a bill is permanently waived for any and all reasons including but not limited to, (a) errors, (b) omissions, (c) Agent's actions, and (d) the Operating Committee's decisions, Agreement interpretations and direction in the administration of the Agreement. Any amounts collected or reimbursed due to such disputes shall exclude interest.

ARTICLE VIII FORCE MAJEURE

8.1 Events Excusing Performance. No Party shall be liable to another Party for or on account of any loss, damage, injury, or expense resulting from or arising out of a delay or failure to perform, either in whole or in part, any of the agreements, covenants, or obligations made by or imposed upon the Parties by this Agreement, by reason of or through strike, work stoppage of labor, failure of contractors or suppliers of materials (including fuel, consumables or other goods and services), failure of equipment, environmental restrictions, riot, fire, flood, ice, invasion, civil war, commotion, insurrection, military or usurped power, order of any court or regulatory agency granted in any *bona fide* legal proceedings or action, or of any civil or military authority either *de facto* or *de jure*, explosion, Act of God or the public enemies, or any other cause reasonably beyond its control and not attributable to its neglect. A Party experiencing such

a delay or failure to perform shall use due diligence to remove the cause or causes thereof; however, no Party shall be required to add to, modify or upgrade any facilities, or to settle a strike or labor dispute except when, according to its own best judgment, such action is advisable.

ARTICLE IX

GENERAL

9.1 No Third Party Beneficiaries. This Agreement does not create rights of any character whatsoever in favor of any person, corporation, association, entity or customer, other than the Parties, and the obligations herein assumed by the Parties are solely for the use and benefit of the Parties. Nothing in this Agreement shall be construed as permitting or vesting, or attempting to permit or vest, in any person, corporation, association, entity or customer, other than the Parties, any rights hereunder or in any of the resources or facilities owned or controlled by the Parties or the use thereof.

9.2 Waivers. Any waiver at any time by a Party of its rights with respect to a default under this Agreement, or with respect to any other matter arising in connection with this Agreement, shall not be deemed a waiver with respect to any subsequent default or matter. Any delay, short of the statutory period of limitation, in asserting or enforcing any right under this Agreement, shall not be deemed a waiver of such right, except as otherwise set forth herein.

9.3 Successors and Assigns. This Agreement shall inure to the benefit of and be binding upon the Parties only, and their respective successors and assigns, and shall not be assignable by any Party without the written consent of the other Parties except to a successor in the operation of its properties by reason of a reorganization, to comply with state or federal restructuring requirements, or a merger, consolidation, sale or foreclosure whereby substantially all such properties are acquired by or merged with those of such a successor.

9.4 Liability and Indemnification. SUBJECT TO ANY APPLICABLE STATE OR FEDERAL LAW THAT MAY SPECIFICALLY RESTRICT LIMITATIONS ON LIABILITY, EACH PARTY SHALL RELEASE, INDEMNIFY, AND HOLD HARMLESS THE OTHER PARTIES, THEIR DIRECTORS, OFFICERS AND EMPLOYEES FROM AND AGAINST ANY AND ALL LIABILITY FOR LOSS, DAMAGE OR EXPENSE ALLEGED TO ARISE FROM, OR BE INCIDENTAL TO, INJURY TO PERSONS AND/OR DAMAGE TO PROPERTY IN CONNECTION WITH ITS FACILITIES OR THE PRODUCTION OR TRANSMISSION OF ELECTRIC ENERGY BY OR THROUGH SUCH FACILITIES, OR

RELATED TO PERFORMANCE OR NON-PERFORMANCE OF THIS AGREEMENT, INCLUDING ANY NEGLIGENCE ARISING HEREUNDER. IN NO EVENT SHALL ANY PARTY BE LIABLE TO ANOTHER PARTY FOR ANY INDIRECT, SPECIAL, INCIDENTAL, OR CONSEQUENTIAL DAMAGES WITH RESPECT TO ANY CLAIM ARISING OUT OF THIS AGREEMENT.

9.5 Notice. Any notice or demand for performance required or permitted under any of the provisions of this Agreement shall be deemed to have been given on the date such notice, in writing, is delivered by hand or deposited in the U.S. mail, postage prepaid, addressed to the Parties at their principal place of business at 1 Riverside Plaza, Columbus, Ohio 43215, or in such other form or to such other address as the Parties may stipulate.

9.6 Interpretation. In this Agreement: (a) unless otherwise specified, references to any Article or Section are references to such Article or Section of this Agreement; (b) the singular includes the plural and the plural includes the singular; (c) unless otherwise specified, each reference to requirement of any governmental entity or regional transmission organization includes all provisions amending, modifying, supplementing or replacing such governmental entity or regional transmission organization from time to time; (d) the words “including,” “includes” and “include” shall be deemed to be followed by the words “without limitation”; (e) unless otherwise specified, each reference to any agreement includes all amendments, modifications, supplements, and restatements made to such agreement from time to time which are not prohibited by this Agreement; (f) the descriptive headings of the various Articles and Sections of this Agreement have been inserted for convenience of reference only and shall in no way modify or restrict the terms and provisions thereof; and (g) “herein,” “hereof,” “hereto” and “hereunder” and similar terms refer to this Agreement as a whole.

ARTICLE X

REGULATORY APPROVAL

10.1 Regulatory Authorization. This Agreement is subject to and conditioned upon its approval or acceptance for filing without material condition or modification by the Commission. In the event that this Agreement is not so approved or accepted for filing in its entirety without modification, or the Commission subsequently modifies this Agreement upon complaint or upon its own initiative, any Party may, irrespective of the notice provisions in

Section 2.1, withdraw from this Agreement by giving thirty (30) days' advance written notice to the other Parties.

10.2 Changes. It is contemplated by the Parties that it may be appropriate from time to time to change, amend, modify, or supplement this Agreement to reflect changes in operating practices, PJM procedures or for other reasons. Any such changes to this Agreement shall be in writing executed by the Parties and subject to approval or acceptance for filing by the Commission. It is the intent of the Parties that, to the maximum extent permitted by law, the provisions of this Agreement shall not be subject to change under Sections 205 and 206 absent the written agreement of the Parties, and that the standard of review for changes unilaterally proposed by a Party, a non-Party or the Commission, acting sua sponte or at the request of a non-Party, shall be the public interest standard of review set forth in *United Gas Pipe Line Co. v. Mobile Gas Service Corp.*, 350 U.S. 332 (1956), *Federal Power Commission v. Sierra Pacific Power Co.*, 350 U.S. 348 (1956), *Morgan Stanley Capital Group, Inc. v. Public Utility District No. 1 of Snohomish County*, 128 S.Ct. 2733 (2008), and *NRG Power Marketing, LLC v. Maine Public Utilities Commission*, 130 S.Ct. 693 (2010).

IN WITNESS WHEREOF, the Parties have caused this Agreement to be executed and attested by their duly authorized officers on the day and year first above written.

APPALACHIAN POWER COMPANY

By: _____
Title: _____

INDIANA MICHIGAN POWER COMPANY

By: _____
Title: _____

KENTUCKY POWER COMPANY

By: _____
Title: _____

OHIO POWER COMPANY

By: _____
Title: _____

AEP GENERATION RESOURCES INC.

By: _____
Title: _____

AMERICAN ELECTRIC POWER SERVICE CORPORATION

By: _____
Title: _____

KENTUCKY POWER COMPANY

RATE SCHEDULE NO. 201

Joint Tariff Common Name: "Bridge Agreement"

Designated Filing Company: Appalachian Power Company (APCo)

Designated Filing Company Tariff Title: APCo Rate Schedules and Service Agreements Tariffs

Designated Filing Company Tariff Program: FPA (Cost Based)

Designated Filing Company Tariff Record Adopted by Reference (Record Content Description/Tariff Record Title): Rate Schedule No. 201, Bridge Agreement

Description of Tariff: Rate Schedule under which APCo, Indiana Michigan Power Company, Kentucky Power Company, Ohio Power Company and AEP Generation Resources Inc. will for an interim time period manage the transactions of the parties beyond termination of the Pool Agreement and manage obligations to fulfill their Fixed Resource Requirement under PJM's Reliability Assurance Agreement.

INDIANA MICHIGAN POWER COMPANY

RATE SCHEDULE NO. 201

Joint Tariff Common Name: "Bridge Agreement"

Designated Filing Company: Appalachian Power Company (APCo)

Designated Filing Company Tariff Title: APCo Rate Schedules and Service Agreements Tariffs

Designated Filing Company Tariff Program: FPA (Cost Based)

Designated Filing Company Tariff Record Adopted by Reference (Record Content Description/Tariff Record Title): Rate Schedule No. 201, Bridge Agreement

Description of Tariff: Rate Schedule under which APCo, Indiana Michigan Power Company, Kentucky Power Company, Ohio Power Company and AEP Generation Resources Inc. will for an interim time period manage the transactions of the parties beyond termination of the Pool Agreement and manage obligations to fulfill their Fixed Resource Requirement under PJM's Reliability Assurance Agreement.

AEP GENERATION RESOURCES INC.

RATE SCHEDULE NO. 2

Joint Tariff Common Name: "Bridge Agreement"

Designated Filing Company: Appalachian Power Company (APCo)

Designated Filing Company Tariff Title: APCo Rate Schedules and Service Agreements Tariffs

Designated Filing Company Tariff Program: FPA (Cost Based)

Designated Filing Company Tariff Record Adopted by Reference (Record Content Description/Tariff Record Title): Rate Schedule No. 201, Bridge Agreement

Description of Tariff: Rate Schedule under which APCo, Indiana Michigan Power Company, Kentucky Power Company, Ohio Power Company and AEP Generation Resources Inc. will for an interim time period manage the transactions of the parties beyond termination of the Pool Agreement and manage obligations to fulfill their Fixed Resource Requirement under PJM's Reliability Assurance Agreement.

OHIO POWER COMPANY
RATE SCHEDULE NO. 200

Joint Tariff Common Name: "Bridge Agreement"

Designated Filing Company: Appalachian Power Company (APCo)

Designated Filing Company Tariff Title: APCo Rate Schedules and Service Agreements Tariffs

Designated Filing Company Tariff Program: FPA (Cost Based)

Designated Filing Company Tariff Record Adopted by Reference (Record Content Description/Tariff Record Title): Rate Schedule No. 201, Bridge Agreement

Description of Tariff: Rate Schedule under which APCo, Indiana Michigan Power Company, Kentucky Power Company, Ohio Power Company and AEP Generation Resources Inc. will for an interim time period manage the transactions of the parties beyond termination of the Pool Agreement and manage obligations to fulfill their Fixed Resource Requirement under PJM's Reliability Assurance Agreement.

Attachment C

1. Certificate of Concurrence – Indiana Michigan Power Company regarding the Power Cost Sharing Agreement and Bridge Agreement
2. Certificate of Concurrence – Kentucky Power Company regarding the Power Cost Sharing Agreement and Bridge Agreement
3. Certificate of Concurrence – Ohio Power Company regarding the Bridge Agreement
4. Certificate of Concurrence – AEP Generation Resources Inc. regarding the Bridge Agreement

CERTIFICATE OF CONCURRENCE

This is to certify that Indiana Michigan Power Company (I&M), a Indiana corporation, assents to and concurs in the FERC FPA Electric Tariff described below, which Appalachian Power Company (APCo), the designated filing company, has filed in its "APCo Rate Schedules and Service Agreements Tariffs" database.

1. Name of Tariff Adopted by Reference: "Power Cost Sharing Agreement among Appalachian Power Company, Indiana Michigan Power Company, Kentucky Power Company and American Electric Power Service Corporation"

APCO Tariff Record Adopted by Reference: Rate Schedule No. 200, Power Cost Sharing Agreement

Description of Tariff: Rate Schedule under which APCo, I&M, Kentucky Power Company and American Electric Power Service Corporation (in an agency role) arrange internal energy and capacity transactions with each other.

2. Name of Tariff Adopted by Reference: "Bridge Agreement"

APCO Tariff Record Adopted by Reference: Rate Schedule No. 201, Bridge Agreement

Description of Tariff: Rate Schedule under which APCo, I&M, Kentucky Power Company, Ohio Power Company and AEP Generation Resources Inc. will for an interim time period manage the transactions of the parties beyond termination of the Pool Agreement and manage obligations to fulfill their Fixed Resource Requirement under PJM's Reliability Assurance Agreement.

By: /John C. Crespo/

John C. Crespo,

Deputy General Counsel – Regulatory Services

Dated: February 8, 2012.

CERTIFICATE OF CONCURRENCE

This is to certify that Kentucky Power Company (KPCo), a Kentucky corporation, assents to and concurs in the FERC FPA Electric Tariffs described below, which Appalachian Power Company (APCo), the designated filing company, has filed in its "APCo Rate Schedules and Service Agreements Tariffs" database.

1. Name of Tariff Adopted by Reference: "Power Cost Sharing Agreement among Appalachian Power Company, Indiana Michigan Power Company, Kentucky Power Company and American Electric Power Service Corporation"

APCO Tariff Record Adopted by Reference: Rate Schedule No. 200, Power Cost Sharing Agreement

Description of Tariff: Rate Schedule under which APCo, Indiana Michigan Power Company, KPCo and American Electric Power Service Corporation (in an agency role) arrange internal energy and capacity transactions with each other.

2. Name of Tariff Adopted by Reference: "Bridge Agreement"

APCO Tariff Record Adopted by Reference: Rate Schedule No. 201, Bridge Agreement

Description of Tariff: Rate Schedule under which APCo, Indiana Michigan Power Company, KPCo, Ohio Power Company and AEP Generation Resources Inc. will for an interim time period manage the transactions of the parties beyond termination of the Pool Agreement and manage obligations to fulfill their Fixed Resource Requirement under PJM's Reliability Assurance Agreement.

By: /John C. Crespo/

John C. Crespo,

Deputy General Counsel – Regulatory Services

Dated: February 8, 2012.

CERTIFICATE OF CONCURRENCE

This is to certify that Ohio Power Company (OPCo), a Ohio corporation, assents to and concurs in the FERC FPA Electric Tariff described below, which Appalachian Power Company (APCo), the designated filing company, has filed in its "APCo Rate Schedules and Service Agreements Tariffs" database.

.Name of Tariff Adopted by Reference: "Bridge Agreement"

APCO Tariff Record Adopted by Reference: Rate Schedule No. 201, Bridge Agreement

Description of Tariff: Rate Schedule under which APCo, Indiana Michigan Power Company, Kentucky Power Company, Ohio Power Company and AEP Generation Resources Inc. will for an interim time period manage the transactions of the parties beyond termination of the Pool Agreement and manage obligations to fulfill their Fixed Resource Requirement under PJM's Reliability Assurance Agreement.

By: /John C. Crespo/

John C. Crespo,

Deputy General Counsel – Regulatory Services

Dated: February 8, 2012.

CERTIFICATE OF CONCURRENCE

This is to certify that AEP Generation Resources Inc. (AEP Gen), a Delaware corporation, assents to and concurs in the FERC FPA Electric Tariff described below, which Appalachian Power Company (APCo), the designated filing company, has filed in its "APCo Rate Schedules and Service Agreements Tariffs" database.

Name of Tariff Adopted by Reference: "Bridge Agreement"

APCo Tariff Record Adopted by Reference: Rate Schedule No. 201, Bridge Agreement

Description of Tariff: Rate Schedule under which APCo, Indiana Michigan Power Company, Kentucky Power Company, Ohio Power Company and AEP Generation Resources Inc. will for an interim time period manage the transactions of the parties beyond termination of the Pool Agreement and manage obligations to fulfill their Fixed Resource Requirement under PJM's Reliability Assurance Agreement.

By: /John C. Crespo/
John C. Crespo,
Deputy General Counsel – Regulatory Services
Dated: February 8, 2012.

STATE OF INDIANA

BEFORE THE INDIANA UTILITY REGULATORY COMMISSION

PETITION OF INDIANA MICHIGAN)
POWER COMPANY, AN INDIANA)
CORPORATION, FOR AUTHORITY TO)
INCREASE ITS RATES AND CHARGES)
FOR ELECTRIC UTILITY SERVICE; FOR)
APPROVAL OF NEW SCHEDULES OF)
RATES, RULES AND REGULATIONS; AND)
FOR AUTHORITY TO ESTABLISH AND)
IMPLEMENT RATE ADJUSTMENT MECHANISMS)
TO TRACK CERTAIN MATTERS RELATING TO)
RELIABILITY ENHANCEMENT, DEMAND-SIDE)
MANAGEMENT! ENERGY EFFICIENCY)
PROGRAMS, OFF-SYSTEM SALES MARGINS,)
PJM, ENVIRONMENTAL COMPLIANCE, AND)
CAPACITY EQUALIZATION SETTLEMENT.)

CAUSE NO: 43306

Study Report of

American Electric Power

Interconnection Agreement

Submitted by Indiana Michigan Power Company

December 11, 2009

AEP INTERCONNECTION AGREEMENT STUDY– CAUSE NO. 43306

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AEP INTERCONNECTION AGREEMENT STUDY- CAUSE NO. 43306

1. INTRODUCTION

The Commission in its order dated March 4, 2009 in Cause No. 43306 directed Indiana Michigan Power Company (“Company” or “I&M”) to file a report regarding the American Electric Power (“AEP”) Interconnection Agreement (“IA” or “Pool”). The Company was instructed to solicit input from interested parties to address the effectiveness, relative costs, customer benefits, and other aspects of the IA and whether it is redundant now that the Company is a member of PJM Interconnection, LLC (“PJM”), a Regional Transmission Organization (“RTO”).

2. DESCRIPTION OF STAKEHOLDER PROCESS AND CASES TO BE STUDIED

On April 1, 2009 the Office of Utility Consumer Counselor (“OUCC”) sent I&M a letter that contained scoping questions regarding the Study. On April 17, 2009 I&M submitted in Cause No. 43306 a proposed stakeholder process leading up to I&M’s filing of a Study Report by December 13, 2009. Specifically, the process, representing a consensus proposal of the parties, was to: (1) present an overview of the IA and its operation within PJM to the interested parties, (2) invite the parties to submit written comments and suggestions regarding the nature of the Study, (3) meet to discuss the parties’ comments and describe I&M’s framework for the Study, (4) meet to discuss the preliminary results of the Study, (5) invite the parties to submit comments regarding the preliminary results of the Study, and (6) meet to discuss the parties’ comments and finalize the input of the parties. On May 22, 2009 I&M met with the parties and conducted a detailed interactive discussion regarding the IA and PJM, facilitated by a 31-slide presentation (completing Step 1). After I&M invited additional written comments, the Commission Staff and OUCC provided detailed written comments on June 8 and June 16, 2009, respectively (completing Step 2). On July 31, 2009 I&M met with the parties, conducted a

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detailed interactive discussion regarding the parties' comments and described I&M's framework for the Study, facilitated by a 19-slide presentation (completing Step 3). After I&M invited additional written comments, the parties jointly provided additional written comments on August 19, 2009 regarding the proposed Study framework. On October 30, 2009 I&M met with the parties and conducted a detailed interactive discussion regarding the preliminary results of the Study, facilitated by a 31-slide presentation (completing Step 4). I&M invited the parties to submit additional written comments regarding the preliminary results of the Study and the parties indicated that they had no additional comments, thereby prompting all parties to agree that the final meeting to discuss such comments was not needed (completing Steps 5 and 6). Each of I&M's above-referenced presentations are included in the workpaper materials being filed in conjunction with the Study Report.

The following table sets out the IA scenarios and studies that were agreed to by the parties as part of the above-described stakeholder process and those parameters have been used to develop the scenarios and economic impact studies contained in this Study Report.

NET ENERGY COST	YEARS			
	<u>2010</u>	<u>2011</u>	<u>2017</u>	<u>2018 *</u>
AEP Pool Within PJM - Low Market	x	x	x	x
Stand Alone Operating Companies Within PJM - Low Market	x	x	x	x
AEP Pool Within PJM - High Market	x	x	x	x
Stand Alone Operating Companies Within PJM - High Market	x	x	x	x
PRIMARY ENERGY DELIVERES PRICED INCREMENTALLY COMPARED TO AVERAGE	x	x		
COOK OUTAGE CASES				
AEP Pool Within PJM	x	x		
Stand Alone Operating Companies Within PJM	x	x		
CAPACITY EQUALIZATION				
5CP versus MLR	x			
RETIREMENT IMPACTS				
(% of Pool Capacity)				x

* Assumes base load capacity additions in 2018 (Cook Uprate - 418MW, APCo IGCC - 635MW)

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3. SUMMARY OF CONCLUSIONS AND RECOMMENDATION

The IA was formulated in 1951 and is a FERC-approved wholesale power pooling agreement. Although each operating company owns specific generating facilities, the AEP System–East Zone is designed, built and operated on an integrated system basis. The IA defines the rights and obligations of the five East Zone operating companies (each called a member) and sets out the methodology for allocating the responsibilities among the members.

AEP integrated its east zone facilities into PJM in October 2004. Joining PJM has brought changes to the manner in which AEP operates. Essentially, AEP is performing the same or similar functions as it did prior to joining an RTO, however, with the requirements of integrating with PJM, some additional responsibilities have been added, while others have been eliminated or modified. In completing the Study, AEP did not identify any activities that were redundant; rather we found the activities to be complimentary and beneficial to customers. Since joining, the AEP Pool member companies have participated on an integrated basis within PJM. Simply put, the AEP Pool companies effectively operate as one large company, utilizing the strengths of diversity to offset inherent risks associated with operating as smaller individual companies in PJM. This means that each member's customers receive low embedded cost capacity and energy regardless of their individual generation supplies while also receiving the benefit of sharing the margins of off-system sales and the opportunity to purchase economic energy to offset more expensive market energy.

Under the IA, Pool member companies collectively participate to supply capacity. Due to AEP's election to participate in the Fixed Resource Requirement (FRR) option and as a result of the Pool construct and FRR participation, the cost to purchase capacity from other Pool Members is based on the embedded cost of installed capacity. From a cost of energy

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perspective, the Pool member companies sell or buy surplus energy to/from other members at a cost-based primary energy rate in addition to purchasing economic energy from the market at the Locational Marginal Price (LMP). By contrast, an AEP company operating without the IA on a stand-alone basis would have more restrictive requirements and more limited opportunities. The capacity factor for AEP's coal units has been increasing since the time AEP joined PJM in 2004. If the operating companies were to operate on a stand-alone basis, fulfilling the reserve requirement would depend on each company's position of capacity length. From a cost of energy perspective, the Pool member companies sell or buy surplus energy to/from other members at a cost-based primary energy rate in addition to purchasing from or selling to the market at the LMP. A stand-alone company lacking energy needed to meet its hourly load requirement would purchase from or sell to the PJM market at the LMP, without the cost-based option the Pool provide to its members.

While more detail and explanation is contained in the body of the Report, the overall results of the three major study scenarios are presented here (negative numbers represent a reduction in Production cost):

TOTAL OF NET PRODUCTION, POOL CAPACITY AND IAA (\$000)					
\$Millions					
Average for Years Modeled					
	Scenario A		Scenario B		Scenario C
	LOW MARKET	HIGH MARKET	LOW MARKET	HIGH MARKET	COOK OUTAGE
APCO	\$ (241)	\$ (19)	\$ (168)		
CSP	\$ 96	\$ 220	\$ 78		
I&M	\$ 28	\$ (113)	\$ 191		
KPCO	\$ (62)	\$ (37)	\$ (62)		
OPCO	\$ 188	\$ (42)	\$ (30)		
Percent Of 2008 Retail/Wholesale Revenue					
	LOW MARKET	HIGH MARKET	LOW MARKET	HIGH MARKET	COOK OUTAGE
APCO	-11.3%	-0.9%	-7.9%		
CSP	5.4%	12.4%	4.4%		
I&M	2.0%	-8.1%	13.7%		
KPCO	-13.0%	-7.6%	-12.8%		
OPCO	10.5%	-2.4%	-1.7%		

Negative Number Represents Decrease in Cost of Service

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As can be seen, whether a particular operating company and its customers benefit under one of the Standalone or Pool cases depends on the variables presented in the scenarios. The results of the Study do not yield definitive conclusions that suggest a change in present course. Consequently, I&M does not believe any further action is needed at this time and makes no further recommendations.

4. OVERVIEW OF AEP INTERCONNECTION AGREEMENT

I&M, Appalachian Power Company (APCo), Columbus Southern Power Company (CSP), Kentucky Power Company (KPCo) and Ohio Power Company (OPCo) are the five AEP East System operating companies (hereafter AEP System–East Zone) which are members of the AEP Power Pool established pursuant to the IA. The IA was formulated in 1951 and is a FERC-approved wholesale power pooling agreement. Although each operating company owns specific generating facilities, the AEP System–East Zone is designed, built and operated on an integrated system basis. The IA defines the rights and obligations of the five East Zone operating companies (each called a member) and sets out the methodology for allocating the responsibilities among the members. Significant provisions of the IA operate as follows:

- Requires each member to provide adequate generating facilities (or resources) to meet its firm load requirement.
- Allocates capacity costs on the basis of each member's highest non-coincident peak (NCP) in the preceding twelve months. Member Load Ratio (MLR) is the ratio of a member's highest NCP in relationship to the total of all members' highest NCP demand.
- Provides a capacity settlement that equalizes responsibility for installed capacity.

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The capacity settlement equalizes reserve margins by assigning responsibility to each member for its MLR share of System capacity. To the extent that a member's capacity is less than its System responsibility, such deficit company is required to make up its shortfall by paying a capacity charge to the surplus companies, based on the embedded cost of capacity of the surplus companies.

- Provides for sales and purchases of energy among the member companies at cost through primary and economy transactions.
- Each member makes its transmission facilities available to all members for the delivery and receipt of power; as members of PJM, each AEP East operating company takes transmission service under the FERC-approved OATT (Open Access Transmission Tariff).
- American Electric Power Service Corporation, as agent for the operating companies, buys and sells into the wholesale market for reliability and economic purposes [off-system purchases and off-system sales (OSS)].
- Provides for sharing of OSS margins among members based on MLR.

Also, there are other agreements among the members of the East operating companies, most notably the Interim Allowance Agreement (IAA) that operates in conjunction with the IA.

5. OVERVIEW OF PJM RTO

AEP (and I&M) integrated its operation with PJM in October 2004. The following is a summary of the PJM RTO with excerpts taken from PJM's website (<http://www.pjm.com>.)

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PJM is an RTO that coordinates the movement of wholesale electricity in all or parts of Delaware, Illinois, Indiana, Kentucky, Maryland, Michigan, New Jersey, North Carolina, Ohio, Pennsylvania, Tennessee, Virginia, West Virginia and the District of Columbia.

- Acting as a neutral, independent party, PJM operates a competitive wholesale electricity market and manages the high-voltage electricity grid to ensure reliability for more than 51 million people.
- PJM's long-term regional planning process provides a broad, interstate perspective that identifies the most effective and cost-efficient improvements to the grid to ensure reliability and economic benefits on a system wide basis.
- An independent Board oversees PJM's activities and provides governance and a collaborative stakeholder process.

PJM's Operations

PJM's staff monitors the high-voltage transmission grid 24 hours a day, seven days a week. PJM keeps the electricity supply and demand in balance by telling power producers how much energy should be generated and by adjusting import and export transactions.

- In managing the grid, PJM dispatches about 163,500 megawatts (MW) of generating capacity over 56,350 miles of transmission lines.
- PJM exercises a broader reliability role than that of a local electric utility. PJM system operators conduct dispatch operations and monitor the status of the grid over a wide area, using telemetered data from nearly 74,000 points on the grid. This gives PJM a big-picture view of regional conditions and reliability issues,

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including those in neighboring systems.

PJM's Market

PJM coordinates the continuous buying, selling and delivery of wholesale electricity through robust, open and competitive spot markets. In operating the markets, PJM balances the needs of suppliers, wholesale customers and other market participants and continuously monitors market behavior.

- PJM's wholesale electricity market is similar to a stock exchange. It establishes a market price for electricity by matching supply with demand. Online eTools make trading easy for members/customers by enabling them to submit bids and offers and providing them with continuous real-time data.
- Market participants can follow market fluctuations as they happen and make informed decisions rapidly, responding to high prices and bringing supply resources to the region that were previously determined to be uneconomic, when demand is high.

6. MAJOR REASONS FOR AEP TO JOIN AN RTO

In Order No. 2000, FERC established a goal of having all transmission-owning entities in the nation place their transmission facilities under the control of appropriate RTOs in a timely manner. In that order and various ensuing orders, FERC employed a number of directives and incentives for accomplishing its goal of universal RTO participation. In fact, FERC had begun employing such directives and incentives even before issuance of Order No. 2000, which merely codified an already-existing policy of strongly encouraging RTO formation. In 1998 AEP and the former Central and South West System (CSW) filed with the FERC an application seeking

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approval of a proposed merger between the two systems. It was clear at the time of the filing that FERC would condition any such approval on the applicants' agreement to join one or more RTOs in order to mitigate what FERC called "transmission market power". During the proceeding, AEP stipulated that it would join RTOs, and as expected, in its order approving the merger issued in 2000, FERC required, as a condition of its approval, AEP to join, and cede functional control of all of its transmission facilities to, one or more RTOs. AEP has complied with this order by ceding functional control of its east zone (*i.e.*, historic AEP) transmission facilities to PJM and its west zone (*i.e.*, former CSW) facilities to the Southwest Power Pool (SPP) and the Electric Reliability Council of Texas (ERCOT).

Many states also required or encouraged RTO participation. For example, Ohio enacted S.B.3 in 1999, which required all transmission-owning utilities in the state to transfer control of their facilities to "qualifying transmission entities" approved by FERC and having the characteristics of RTOs. Similar legislation was enacted in Virginia and Michigan. In 2003, the IURC reviewed and approved, with conditions, I&M's decision to join PJM. *See* September 10, 2003 Order in Cause Nos. 42350 and 42352.

As a practical matter, AEP had very little, if any, choice regarding joining an RTO. The federal policies in favor of increased regionalization of grid management and electricity markets that led to the Companies' participation are still in place and unlikely to change anytime soon. Regionalization greatly broadens the base of stakeholders interested in any utility's participation far beyond the utility's retail service area. Federal jurisdiction over RTOs is both a reality and in some respects, a practical necessity. Finally, even if the structure of the Company's participation in regional institutions were to change, it is unlikely that many of the core elements of such participation including independent regional grid operation and tariff administration, non-

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pancaked transmission rates, and regional transmission planning would be undone.

AEP integrated its east zone facilities into PJM in October 2004. Specifically, AEP joined PJM, an established RTO with known costs and geographically aligned with the AEP system, for a number of reasons. PJM provided what other RTO/ISO's either could not or were still in the nascent stages of developing, including (1) enhanced reliability of the AEP transmission system through the ability to participate in the regional transmission planning process, (2) a market model that matched the FERC standard Market Design, (3) a fully functioning energy and ancillary service markets consistent with states with customer choice, and (4) approved procedures for congestion management, reserve margins, market mitigation, and market monitoring.

a. Changes to AEP Operations as a Member of PJM

Joining PJM has brought changes to the manner in which AEP operates. Essentially, AEP is performing similar functions (although some to a lesser degree) as it did prior to joining an RTO. However, with the requirements of integrating with PJM, some additional responsibilities have been added, while others have been eliminated or modified.

For example, from a Transmission perspective, compliance with FERC and NERC reliability standards would be required whether AEP joined PJM or not. More compliance monitoring and reporting is now in existence by RTOs and transmission providers to ensure reliability problems are avoided. PJM has assumed some of the compliance responsibilities that would otherwise be assigned to AEP – in some cases, PJM has delegated some of those compliance responsibilities back to AEP.

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In addition, PJM plans all transmission expansion activities involving the AEP footprint at or above 138 kV. PJM works with AEP to ensure that the AEP transmission system meets all applicable NERC Reliability Standards, PJM planning criteria, and AEP planning criteria. Although the end result is a more efficient and comprehensive transmission plan, the process is more complex and with less control being exercised by AEP. Likewise, Transmission operation and maintenance activities must be coordinated through PJM which improves the overall reliability of the interconnected systems, but at the same time complicates the scheduling of the AEP resources required to effectively perform those transmission maintenance activities.

Finally, FERC Order 890, passed in 2007, requires that transmission providers make their transmission planning processes transparent to all transmission customers and stakeholders through the posting of study models, assumptions, and results, including the vetting with stakeholders of all projects that comprise the regional and local transmission expansion plans. PJM provides the vehicle for AEP to comply with the requirements of this Order.

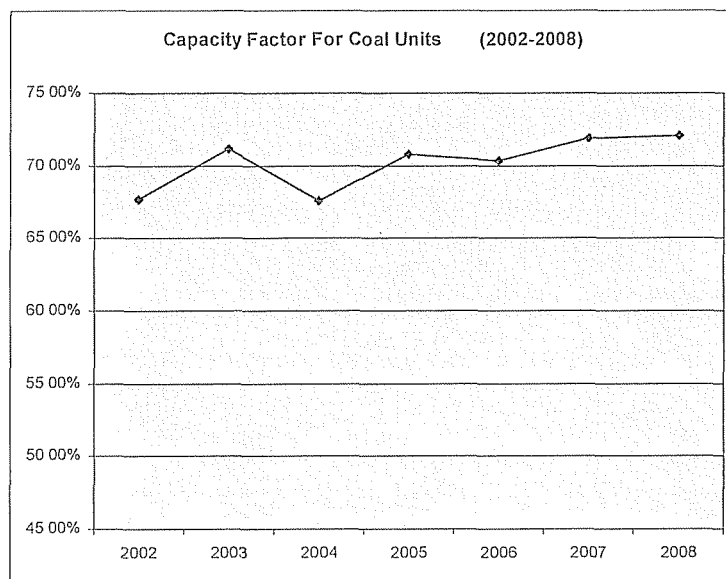
AEP no longer has primary responsibility for the Balancing Area functions and reliability coordinator role, which has been transferred to PJM. AEP must now interact extensively with PJM with regards to our generating unit operation, load responsibilities and the financial impacts of decisions made on a daily basis and those related to longer-term market design issues.

In addition, AEP must now provide new analytical resources to effectively participate and manage its load and resources in the PJM market. It was necessary for AEP to develop congestion management models and tools to manage the Financial Transmission Right (FTR) allocation and trading impacts that evolved from the more limited Transmission Loading Relief mechanism previously employed prior to joining PJM.

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AEP now performs extensive financial analysis to understand the impact of decisions within PJM including PJM dispatch decisions, analysis of PJM market design changes and the PJM invoice. AEP needed to add resources and systems in conjunction with accounting settlement functions to review, analyze and process the invoices from PJM. IT systems were also required to be added and/or enhanced to incorporate RTO market protocols, PJM charges/credits, to track load and generation-related data and to communicate with PJM systems.

Due to the daily requirement to bid/offer our load and generation resources into PJM, a group was formed to have primary responsibility to fulfill this requirement. AEP must bid its load and offer energy and ancillary services. The group provides the generating unit limits and current status of each generating unit which requires extensive coordination with PJM to ensure these values are correct to optimize the dispatch of AEP's resources. This team not only oversees our daily bid/offers to PJM, but also coordinates the development of systems to assist in the bid process and cost tracking. The following table shows that the capacity factor for AEP's coal units has been increasing since the time it joined PJM in 2004.



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Based on a 2010 forecast filed in Cause No. 43774 (PJM Cost Rider Adjustment filed September 2, 2009), it is estimated that AEP, on behalf of the east operating companies, will pay PJM approximately \$34.1 million in administrative fees in 2010 for the services provided to AEP for its internal load customers. Indiana's retail jurisdictional share of those fees is \$6.2 million. The following table compares the major services provided by PJM with how these services were provided before joining PJM.

Operating Pre-PJM vs. PJM

	Pre-PJM	PJM
Transmission Planning	Plan entire transmission system	PJM in coordination with AEP plans transmission for 138 kV and above while AEP plans for below 138 kV.
Transmission Operations	Operate entire transmission grid	PJM in coordination with AEP operates AEP's transmission system
OASIS and Transmission Access	Contracted with SPP	Provided by PJM
Economic Dispatch	Security constrained economic dispatch of system based on monthly variable production costs	PJM performs Security constrained economic dispatch based on bids supplied by AEP and other generators
Ancillary Services	Self-supply regardless of economics	Optimize between self-supply and market supply
OSS Billing	Bill counterparties for monthly transaction	Still bill counterparty for direct transaction Develop and run a shadow settlement system to validate PJM invoice
Market Monitor	Contracted with Charles River Associates	Provided by PJM

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b. PJM and AEP Power Pool Similarities and Distinctions

Even with participation in PJM, AEP's cost and revenue allocation principles remain the same. Energy settlements among the Member Companies are still performed the same as "pre-PJM". Since the inception of the AEP East IA, the following processes have remained the same even after joining PJM:

- Energy Costing & Reporting (ECR) is used to determine the allocation of energy and costs to OSS and internal load
- Member companies generation and power purchases are assigned after the fact with highest cost resources being assigned to OSS
- Member companies with resources greater than their internal load provide primary energy to energy deficit companies
- OSS Margins (which now includes PJM Spot Market Energy) are allocated based on MLR.

There are similarities and distinct differences in the potential cost of services and how those costs are determined – depending on whether the member companies are part of the AEP East Pool or are operating as stand-alone members of PJM. Since joining, the AEP Pool member companies have participated on an integrated basis within PJM. This effectively means, in simplest terms, that the AEP Pool companies operate as one large company, utilizing the strengths of diversity to offset inherent risks associated with operating as smaller individual companies in PJM. Some examples are discussed below.

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With regard to a company meeting its capacity requirement, PJM has implemented a capacity auction (Reliability Pricing Model or RPM) along with the option of a FRR. The FRR option allows a company to meet its reserve margin requirement by self-supplying its own capacity resources, while the RPM provides a company the ability to purchase its capacity from a central market at market rates. PJM plans its capacity resources to meet the needs of the footprint as opposed to a single company or smaller region. The capacity market provides market participants with forward price signals and allows FRR members the ability to self-supply their capacity needs if the option has greater benefit than purchasing from a market solution. As each member's situation is different, PJM rules allow for flexibility in meeting its capacity and reserve requirement.

AEP has selected the FRR option for fulfilling its capacity reserve requirement. AEP is able to utilize the length in the AEP Pool to mitigate financial penalties associated with any deteriorating generating unit performance during peak periods, referred to as EFORp performance. This penalty results in a charge to the resource owner for a unit not performing during the approximate 500 hour peak period as well as it did in the five previous planning years.

In addition, AEP is able to utilize length in the AEP Pool to mitigate financial penalties or avoid replacement costs for major outages (*e.g.*, the D.C. Cook Plant) referred to as EFORD performance. Based on a unit's performance in the current year, its capacity value can be lowered in the following planning year.

For example, in the current situation of the unplanned outage at the Cook plant, I&M would be penalized (EFORp charge received) for the current planning year and it would not be able to claim the capacity value of the unit in its FRR plan for the following year (EFORD

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penalty). Effectively, there is a current and lag penalty associated with the sub-performance of a unit.

As stated earlier, in the current capacity construct within PJM, the AEP Pool member companies collectively participate in the FRR option to supply capacity. This allows AEP to fulfill its reserve margin requirement with capacity resources from East Pool operating companies. Some of the benefits of FRR include (1) the reserve margin requirement is known in advance and has, for the entire history of RPM, been lower than the cleared reserve requirement, (2) the FRR approach aligns closely with the traditional approach to capacity planning as it relates to Integrated Resource Planning, and (3) FRR avoids exposure to the volatility of a structured capacity market.

From an operating company stand-alone basis, the approach for fulfilling the reserve requirement would depend on the position of capacity length. Certain long operating companies would be in a position to select either FRR or participation in the RPM market, however short operating companies would be required to participate in the RPM auction to satisfy their reserve margin requirement. In the RPM auction, the cost of capacity is determined by an administratively-defined demand curve and the corresponding cost of supply. The results of the capacity auction have swung widely in the three most recent auctions for the AEP control area. The impacts of a forced outage were highlighted previously and are exacerbated for a company participating on a stand-alone basis.

Due to AEP's election to participate in FRR and as a result of the pool construct, the cost to purchase capacity from other Pool members is based on the embedded cost of installed capacity. From a cost of energy perspective, the Pool member companies sell or buy surplus

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energy to/from other members at a cost-based primary energy rate in addition to purchasing from the market at the Locational Marginal Price (LMP). Based on the IA, the lowest cost resource (generation or purchase) is assigned to the native load, while higher cost resources are assigned to OSS. As a stand-alone entity, a company in need of energy would purchase from the PJM market at the LMP. During periods of high LMPs, a stand-alone energy-long company could sell into the market and receive a potentially higher payment than it would have received from other Pool members. However, a company short of energy during these periods would be subject to paying those higher market prices.

With respect to the congestion costs and marginal loss components of the LMP, the primary difference between an AEP Pool member company and a stand-alone company is the costs would be assigned on an MLR basis or billed directly by PJM, respectively. This treatment would also be consistent with FTR revenues and marginal loss credits. Depending on the location of the company in PJM and the accompanying energy flows, these costs/credits could go up or down. PJM has provided FTRs as a mechanism to hedge congestion costs. Historically, the revenue from the FTRs has been in excess of the cost of congestion but at a decreasing rate. Transmission enhancements would continue to drive this difference lower.

Currently, ancillary service costs are assigned to each of the AEP Pool member companies based on the MLR. The cost of supplying this service, in addition to any fuel-related cost, is embedded in the company's cost. This would be similar for a stand-alone company that has the capability of providing those services. Excluding the costs of reactive and black start services which are not determined by market offers, but administratively by FERC, AEP currently offers into the market enough ancillary services to cover its load. If the market provides a less expensive alternative, AEP benefits from that lower price. A stand-alone

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company could use a similar approach, providing it has the capability to supply these services. Similar to the outcome of FTR revenue and marginal loss credits, dependent on the situation of the specific company, the total cost of these services could go up or down. The diversity of the AEP Pool acts as buffer, allowing AEP to fulfill its requirements from a range of sources (including the market). This has a limiting effect on risk for any operational situations encountered.

The PJM market provides both challenges and opportunities which are described above. The AEP Pool has a stabilizing effect, one that is able to straddle the market environment while maintaining more traditional cost allocations. If AEP were to withdraw from PJM it would need to perform control area responsibilities and would be required to employ independent third parties to administer its OATT, to perform market monitor functions related to AEP's wholesale activities and to serve as its reliability coordinator. In addition, AEP would be required to contact numerous counterparties in its search to sell and purchase power as opposed to utilizing PJM to make spot sales and purchases. PJM provides the market benefits of a day-ahead and real-time energy market and ancillary services market that cannot be effectively duplicated with bilateral arrangements and phone calls to other market participants, especially now, with so many potential counterparties rendered unavailable or uninterested since they too are participating in these same RTO markets. The benefits of these markets, which provide AEP with the lowest purchase price and cost for ancillary services, are optimized in an RTO environment.

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7. THE PRIMARY STUDY - I&M AS MEMBER OF AEP POOL VERSUS I&M OPERATING AS A STAND-ALONE ENTITY IN PJM

To address the issues raised by the Commission's Order, the Company, with the input of the parties, has included a cost analysis of the Pool members on a Standalone basis operating in the PJM RTO. The cost of operating on a Standalone basis in PJM is compared to the cost of the member companies operating under the Pool agreement. This cost comparison was done for three scenarios. Two of the scenarios use different market prices, a high market price and a low market price. Another scenario was done using the high market prices with both Cook nuclear units out of service for the years 2010 and 2011.

For the Standalone cases, the IAA was also considered to be terminated. That is, the Pool member companies operate independently in managing sulfur dioxide ("SO₂") emission allowances.

a. Study Methodology/General Assumptions

Period of Study

For the market price scenarios, the Study looks at two distinct periods: A near term view using 2010 and 2011, and a longer term view using 2017 and 2018. To summarize the data an average has been calculated for the four year study period. The individual years are also presented. For the Cook outage scenario only 2010 and 2011 were modeled.

Dispatch and IRP Assumptions

For purposes of the Study, the dispatch of AEP's and I&M's generating units are the same for the Standalone and Pool cost comparisons. This assumption reflects the fact that AEP bids its units into PJM and PJM determines, based on all the generation bids it receives, which units are dispatched. Whether or not a unit is still in the AEP Pool would not be expected to alter

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the dispatch. If different groups within AEP became responsible for bidding the units into PJM as a result of code of conduct concerns, there may be some affect on unit dispatch, but it would not be possible to model this in any meaningful way.

Also, for purposes of the Study, the Integrated Resource Plan (IRP) is considered the same under the Standalone and Pool comparisons. AEP establishes its IRP on an integrated AEP basis. In the long term, the Standalone approach, may result in an IRP for an individual operating company that differs from an IRP developed for that company as a member of the Pool. Based on input of the parties to this case, certain assumptions differ from the Company's current IRP. One significant difference between the Study and the IRP filed with the Indiana Commission on October 30, 2009 is that this Study includes an Integrated Gasification Combined Cycle (IGCC) power plant in place of four combustion turbine gas units that are included in the IRP. The Company included the IGCC in the Study as requested by the parties to this proceeding.

Other General Assumptions

For the Standalone model, energy is purchased or sold in the PJM market on hourly basis, based on the needs of the individual operating company. Capacity has been bought and sold in the PJM RPM market. Long-term contracts, or bilateral deals have not been reflected. The operating companies are modeled as price takers in the market. As previously mentioned, in the Standalone model, the IAA and therefore, affiliate transactions for SO₂ emission allowances, have been eliminated and the operating companies are interacting directly with the SO₂ allowance markets. No costs for AEP structural and operational changes that may be required to achieve a Standalone operation have been included. For example, commercial operations might need to be reorganized to comply with codes of conduct if the AEP power pool is terminated.

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Presented in the tables below are other significant assumptions common to all three scenarios.

Cook Capacity Up-Rates

Cook Unit 1 up-grade 237-MW in Service by 1/2018
 Cook Unit 2 up-grade 195-MW in Service by 1/2018

Fossil Fuel Plant Additions

Units	Company	Winter/Summer	In-Service Date
Dresden	APCo	625MW / 540MW	4/2013
Muskingum 1 (Stoker)	OPCo	130MW / 121MW	1/2018
IGCC 1	APCo	637MW / 624MW	1/2018

Wind Additions

Facility	Year	MW					Total	Cumulative
		APCo	CSP	I&M	KPCo	OPCo		
Camp Grove	2009	75					75	75
Fowler Ridge I	2009	100		100			200	275
Fowler Ridge II	2009		50	50		50	150	425
Grand Ridge	2009	100					100	525
Beech Ridge	2010	100					100	625
Generic	2010	175	100	150	50	125	600	1,225
Generic	2011	200	125	100	50	225	700	1,925
Generic	2012	100	150	100		150	500	2,425
Generic	2015		40	60			100	2,525

Unit Retirements

The following table shows units assumed to retire in the study period. Actual retirement dates may depend on the unit's physical conditions, overall cost of operation and compliance with environmental regulations.

Unit	Owner	Winter Capacity MW	Assumed Retirement Year
Sporn 5	OPCo	450	2010
Conesville 3	CSP	165	2012
Muskingum 1-4	OPCo	840	2015
Glen Lyn 5 & 6	APCo	335	2015
Picway 5	CSP	100	2015
Kammer 1-3	OPCo	630	2017
Sporn 1 & 3	APCo	300	2018
Sporn 2 & 4	OPCo	300	2018

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More detailed assumptions, detailed work papers, and data used in the Study are being provided separately to the Parties as electronic files.

The Scenarios Modeled

Three scenarios were performed. Each of the scenarios compares production costs for the five operating companies on a Standalone basis to membership in the Pool. The Study period for scenarios 1 and 2 is the years 2010, 2011, 2017 and 2018. Two of the scenarios are intended to show the effects of different market price assumptions on the Standalone to Pool comparison. The market prices used can be characterized as a low market price scenario and a high market price scenario. The third scenario presents the comparison between the Standalone and Pool analysis for 2010 and 2011 assuming that both Cook nuclear units are out of service. It uses the high market price data. The scenarios described above are the primary ones for this Report, however, certain other studies were performed as described later in this Report.

b. The Results of the Study

Comparison of the Three Scenarios

The following table presents the results of the three scenarios in summary fashion. In the table below, total 2008 retail and requirement sales (RQ) wholesale revenue are used to gauge the relative change among Companies under Standalone and Pool cases and among the various scenarios. The percent shown is the ratio of the change in production cost over the 2008 revenues. The change in production cost is the Pool production cost less the Standalone production cost, therefore a credit or negative number is favorable to the Company and its customers. The production cost presented in this study excludes the capital costs, such as depreciation and cost of capital, associated with serving the company's own firm customers (*i.e.*, retail and RQ). It deals only with the surplus or deficit energy (affiliate transactions) which is

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accounted for in the Pool.

TOTAL OF NET PRODUCTION, POOL CAPACITY AND IAA (\$000)				
\$Millions				
Average for Years Modeled				
	Scenario A	Scenario B	Scenario C	
	LOW MARKET	HIGH MARKET	COOK OUTAGE	
APCO	\$ (241)	\$ (19)	\$ (168)	
CSP	\$ 96	\$ 220	\$ 78	
I&M	\$ 28	\$ (113)	\$ 191	
KPCO	\$ (62)	\$ (37)	\$ (62)	
OPCO	\$ 188	\$ (42)	\$ (30)	
Percent Of 2008 Retail/Wholesale Revenue				
	LOW MARKET	HIGH MARKET	COOK OUTAGE	
APCO	-11.3%	-0.9%	-7.9%	
CSP	5.4%	12.4%	4.4%	
I&M	2.0%	-8.1%	13.7%	
KPCO	-13.0%	-7.6%	-12.8%	
OPCO	10.5%	-2.4%	-1.7%	

Negative Number Represents Decrease in Cost of Service

Study Documents

Provided as part of this Report are tables supporting the summary results presented above for each of the three scenarios by year. The tables show production costs per the Pool, the production costs on a Standalone basis and the difference in those production costs.

Major Components

For purposes of the Study and to aid in understanding of the results, Standalone to Pool comparisons are presented for net production costs (energy), capacity and environmental (SO₂) and total.

- **NET PRODUCTION COSTS:** In the Standalone cases, energy transactions reflect the buying or selling of kWh in PJM at market prices, with no energy transactions among the members of the Pool. In the Pool case, energy is exchanged among member companies and traditional sales and purchases in PJM are modeled in accordance with the IA. In both the Standalone and Pool cases

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any opportunity sales are credited against costs to calculate Net Production Cost. Net Production Cost is used to gauge whether a Company is better off in the Standalone or Pool case from an energy perspective. Lower Net Production Cost represents a benefit to the Company and customer.

- **CAPACITY:** In the Standalone case, capacity is bought and sold into the PJM RPM market at an assumed capacity price with each individual member. In the Pool cases, capacity payments and sales to affiliates are based on the IA and any excess Pool capacity is sold into PJM at the assumed capacity price and assigned to the members by MLR. In the scenario in which the Cook nuclear units are out of service and when the AEP system is short of capacity, capacity purchases are likewise assigned to the Pool members based on MLR.
- **ENVIRONMENTAL – IAA:** In the Standalone cases the IAA and the resulting affiliate allowance transactions have been eliminated and replaced by individual operating company transactions in the SO₂ market. In the Pool cases the IAA governs the treatment of SO₂ allowances among the Pool members. Any purchases or sales in the SO₂ market are assigned by MLR.

c. **Scenario A – Low Market Price**

Summary of Scenario A

The following table presents a summary of the results for Scenario A which is based on low market prices prevailing during the study period. PJM market prices utilized are those at the lower portion of the market price range that might be expected during the four-year study period. The production cost numbers presented below are the nominal average for the four-year study

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period. The summary table shows the difference between the Pool and the PJM Standalone cases for Net Production Cost, Capacity and the IAA. Decreases indicate that the Standalone case is more favorable for a particular Pool member.

Summary Table – Scenario A (Average for Study Period)

\$Millions	Net Production	Capacity	IAA Elimination	Total
APCO	\$ 123	\$ (364)	\$ 1	\$ (241)
CSP	\$ 100	\$ 2	\$ (5)	\$ 96
I&M	\$ (150)	\$ 161	\$ 17	\$ 28
KPCO	\$ 11	\$ (74)	\$ 1	\$ (62)
OPCO	\$ (84)	\$ 275	\$ (4)	\$ 188

Additional Specific Assumptions For Scenario A

- Pool affiliate transactions are eliminated in the Standalone view
- All short or excess energy is bought and sold in the PJM spot market – no bilateral contracts- in the Standalone view
- PJM Capacity is priced at \$50 MW-Day for 2010 and 2011, and \$160 for 2017 and 2018
- AEP is able to sell a relatively small amount of its available excess energy in the market because of the low market prices used in the scenario

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Additional Detail For Scenario A

The following tables present more detailed data for Scenario A.

Table 1 shows the Net Production cost for the Pool and Standalone cases for each year of the study.

Table 1 – Scenario A

	2010	2011	2017	2018	Average
NET PRODUCTION COST (\$000)					
Pool in Place					
APCO	\$ 1,083,654	\$ 1,217,371	\$ 1,745,147	\$ 1,703,629	\$ 1,437,450
CSP	\$ 567,919	\$ 671,748	\$ 1,041,385	\$ 1,038,930	\$ 829,996
I&M	\$ 625,510	\$ 661,591	\$ 922,642	\$ 902,661	\$ 778,101
KPCO	\$ 216,684	\$ 242,132	\$ 380,643	\$ 375,915	\$ 303,843
OPCO	\$ 981,182	\$ 1,120,020	\$ 1,616,341	\$ 1,688,846	\$ 1,351,597
Total	\$ 3,474,950	\$ 3,912,862	\$ 5,706,158	\$ 5,709,981	\$ 4,700,987
PJM Standalone					
APCO	\$ 1,113,490	\$ 1,242,414	\$ 1,978,318	\$ 1,905,920	\$ 1,560,036
CSP	\$ 582,812	\$ 674,005	\$ 1,195,943	\$ 1,266,301	\$ 929,765
I&M	\$ 580,085	\$ 631,959	\$ 721,284	\$ 580,644	\$ 628,493
KPCO	\$ 213,844	\$ 239,610	\$ 394,084	\$ 412,227	\$ 314,941
OPCO	\$ 984,785	\$ 1,124,776	\$ 1,416,473	\$ 1,544,787	\$ 1,267,705
Total	\$ 3,475,016	\$ 3,912,764	\$ 5,706,102	\$ 5,709,879	\$ 4,700,940
Change					
APCO	\$ 29,836	\$ 25,043	\$ 233,170	\$ 202,292	\$ 122,585
CSP	\$ 14,893	\$ 2,257	\$ 154,558	\$ 227,370	\$ 99,770
I&M	\$ (45,425)	\$ (29,632)	\$ (201,358)	\$ (322,017)	\$ (149,608)
KPCO	\$ (2,840)	\$ (2,522)	\$ 13,441	\$ 36,312	\$ 11,098
OPCO	\$ 3,603	\$ 4,756	\$ (199,868)	\$ (144,059)	\$ (83,892)
Total	\$ 66	\$ (98)	\$ (56)	\$ (102)	\$ (47)

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Table 2 shows the Capacity Cost for the Pool and Standalone cases for each year of the study.

Table 2 – Scenario A

	2010	2011	2017	2018	Average
CAPACITY (\$000)					
Pool in Place (Pool Capacity Payments/Receipts + PJM Capacity Surplus Sale)					
APCO	\$ 373,166	\$ 391,440	\$ 420,958	\$ 361,423	\$ 386,747
CSP	\$ 9,672	\$ (13,790)	\$ 24,776	\$ 57,757	\$ 19,604
I&M	\$ (71,554)	\$ (88,928)	\$ (233,827)	\$ (342,519)	\$ (184,207)
KPCO	\$ 67,155	\$ 61,411	\$ 81,761	\$ 99,957	\$ 77,571
OPCO	\$ (369,680)	\$ (364,203)	\$ (333,263)	\$ (242,785)	\$ (327,483)
Total	\$ 8,760	\$ (14,071)	\$ (39,595)	\$ (66,167)	\$ (27,768)
PJM Standalone(Capacity Based on PJM Market)					
APCO	\$ 20,659	\$ 18,049	\$ 34,222	\$ 18,396	\$ 22,832
CSP	\$ 10,877	\$ 9,764	\$ 31,711	\$ 33,989	\$ 21,585
I&M	\$ 11,224	\$ (6,661)	\$ (39,946)	\$ (58,342)	\$ (23,431)
KPCO	\$ 4,271	\$ 1,971	\$ 2,978	\$ 3,738	\$ 3,239
OPCO	\$ (38,270)	\$ (37,194)	\$ (68,562)	\$ (63,948)	\$ (51,993)
Total	\$ 8,760	\$ (14,071)	\$ (39,595)	\$ (66,167)	\$ (27,768)
Change					
APCO	\$ (352,507)	\$ (373,391)	\$ (386,736)	\$ (343,027)	\$ (363,915)
CSP	\$ 1,205	\$ 23,554	\$ 6,935	\$ (23,768)	\$ 1,981
I&M	\$ 82,777	\$ 82,267	\$ 193,881	\$ 284,178	\$ 160,776
KPCO	\$ (62,885)	\$ (59,440)	\$ (78,782)	\$ (96,220)	\$ (74,332)
OPCO	\$ 331,410	\$ 327,010	\$ 264,702	\$ 178,837	\$ 275,490
Total	\$ -	\$ -	\$ -	\$ -	\$ -

Table 3 shows the SO2 Cost for the Pool and Standalone cases for each year of the study.

Table 3 – Scenario A

	2010	2011	2017	2018	Average
ELIMINATION OF IAA - Net SO2 Cost (\$000)					
Pool in Place					
APCO	\$ (20,187)	\$ (9,680)	\$ (21,065)	\$ (4,860)	\$ (13,948)
CSP	\$ (3,722)	\$ (5,627)	\$ (5,681)	\$ (2,869)	\$ (4,475)
I&M	\$ 5,258	\$ 4,611	\$ 23,905	\$ 22,167	\$ 13,985
KPCO	\$ 4,694	\$ 6,996	\$ (1,653)	\$ (1,798)	\$ 2,060
OPCO	\$ 13,470	\$ 26,002	\$ 7,632	\$ (17,659)	\$ 7,361
Total	\$ (487)	\$ 22,302	\$ 3,139	\$ (5,019)	\$ 4,984
PJM Standalone					
APCO	\$ 2,370	\$ 3,699	\$ (39,129)	\$ (20,540)	\$ (13,400)
CSP	\$ 4,218	\$ 3,626	\$ (17,953)	\$ (29,067)	\$ (9,794)
I&M	\$ 4,567	\$ 4,380	\$ 60,476	\$ 53,000	\$ 30,606
KPCO	\$ 4,690	\$ 3,346	\$ 3,346	\$ 358	\$ 2,935
OPCO	\$ 5,793	\$ 5,592	\$ 1,684	\$ 164	\$ 3,308
Total	\$ 21,638	\$ 20,643	\$ 8,424	\$ 3,916	\$ 13,655
Change					
APCO	\$ 22,557	\$ 13,379	\$ (18,064)	\$ (15,679)	\$ 548
CSP	\$ 7,939	\$ 9,253	\$ (12,272)	\$ (26,198)	\$ (5,320)
I&M	\$ (691)	\$ (231)	\$ 36,571	\$ 30,833	\$ 16,621
KPCO	\$ (4)	\$ (3,650)	\$ 5,000	\$ 2,156	\$ 875
OPCO	\$ (7,677)	\$ (20,410)	\$ (5,949)	\$ 17,823	\$ (4,053)
Total	\$ 22,125	\$ (1,659)	\$ 5,285	\$ 8,935	\$ 8,671

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Table 4 shows the summary of the Net Production component, the Capacity component and IAA component for the Pool and Standalone cases for each year of the study.

Table 4 – Scenario A

TOTAL OF NET PRODUCTION, POOL CAPACITY AND IAA (\$000)						
	2010	2011	2017	2018	Average	
Pool in Place						
APCO	\$ 1,436,632	\$ 1,599,131	\$ 2,145,040	\$ 2,060,191	\$ 1,810,249	
CSP	\$ 573,870	\$ 652,331	\$ 1,060,480	\$ 1,093,819	\$ 845,125	
I&M	\$ 559,215	\$ 577,274	\$ 712,720	\$ 582,309	\$ 607,879	
KPCO	\$ 288,533	\$ 310,540	\$ 460,750	\$ 474,074	\$ 383,474	
OPCO	\$ 624,972	\$ 781,818	\$ 1,290,710	\$ 1,428,402	\$ 1,031,476	
Total	\$ 3,483,223	\$ 3,921,093	\$ 5,669,701	\$ 5,638,794	\$ 4,678,203	
PJM Standalone						
APCO	\$ 1,136,519	\$ 1,264,162	\$ 1,973,411	\$ 1,903,777	\$ 1,569,467	
CSP	\$ 597,906	\$ 687,395	\$ 1,209,701	\$ 1,271,223	\$ 941,556	
I&M	\$ 595,876	\$ 629,678	\$ 741,814	\$ 575,303	\$ 635,668	
KPCO	\$ 222,805	\$ 244,927	\$ 400,409	\$ 416,322	\$ 321,116	
OPCO	\$ 952,308	\$ 1,093,175	\$ 1,349,595	\$ 1,481,003	\$ 1,219,020	
Total	\$ 3,505,414	\$ 3,919,336	\$ 5,674,931	\$ 5,647,627	\$ 4,686,827	
Change						
APCO	\$ (300,114)	\$ (334,969)	\$ (171,629)	\$ (156,415)	\$ (240,782)	
CSP	\$ 24,036	\$ 35,064	\$ 149,221	\$ 177,404	\$ 96,431	
I&M	\$ 36,661	\$ 52,404	\$ 29,094	\$ (7,006)	\$ 27,788	
KPCO	\$ (65,729)	\$ (65,613)	\$ (60,342)	\$ (57,752)	\$ (62,359)	
OPCO	\$ 327,335	\$ 311,356	\$ 58,885	\$ 52,602	\$ 187,545	
Total	\$ 22,191	\$ (1,757)	\$ 5,230	\$ 8,833	\$ 8,624	

d. Scenario B – High Market Price

Summary of Scenario B

The following table presents a summary of the results for Scenario B which is based on a high view of market prices. PJM market prices utilized are those at the top of the market price range that might be expected during the four-year study period. The production cost numbers presented below are the average for the four-year study period. The summary table shows the difference between the Pool and the PJM Standalone case for Net Production Cost, Capacity and the IAA. Decreases indicate that the Standalone case is more favorable for a particular pool member.

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Summary Table – Scenario B (Average for Study Period)

\$Millions	Net Production	Capacity	IAA Elimination	Total
APCO	\$ 295	\$ (314)	\$ (0)	\$ (19)
CSP	\$ 183	\$ 41	\$ (3)	\$ 220
I&M	\$ (266)	\$ 139	\$ 14	\$ (113)
KPCO	\$ 29	\$ (66)	\$ 1	\$ (37)
OPCO	\$ (240)	\$ 201	\$ (3)	\$ (42)

Additional Specific Assumptions For Scenario B

- Pool affiliate transactions are eliminated in the Standalone view
- All short or excess energy is bought and sold in the PJM spot market – no bilateral contracts- in the Standalone view
- PJM Capacity is priced at \$160 MW-Day for 2010 and 2011, and \$360 MW-Day for 2017 and 2018
- AEP is able to sell a relatively high amount of its available excess energy in the market

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Additional Detail For Scenario B

The following tables present more detailed data for Scenario B, using high market prices.

Table 1 shows the Net Production cost for the Pool and Standalone cases for each year of the study.

Table 1 – Scenario B

	2010	2011	2017	2018	Average
NET PRODUCTION COST (\$000)					
Pool in Place					
APCO	\$ 1,085,570	\$ 1,349,487	\$ 2,211,114	\$ 2,230,699	\$ 1,719,218
CSP	\$ 599,752	\$ 757,667	\$ 1,260,440	\$ 1,247,303	\$ 966,290
I&M	\$ 617,706	\$ 708,757	\$ 1,058,200	\$ 1,045,302	\$ 857,491
KPCO	\$ 232,095	\$ 287,648	\$ 499,265	\$ 498,250	\$ 379,314
OPCO	\$ 1,000,534	\$ 1,294,400	\$ 2,189,168	\$ 2,227,102	\$ 1,677,801
Total	\$ 3,535,657	\$ 4,397,958	\$ 7,218,188	\$ 7,248,655	\$ 5,600,115
PJM Standalone					
APCO	\$ 1,400,917	\$ 1,604,007	\$ 2,523,020	\$ 2,528,932	\$ 2,014,219
CSP	\$ 753,606	\$ 913,273	\$ 1,420,014	\$ 1,508,269	\$ 1,148,790
I&M	\$ 393,006	\$ 488,005	\$ 839,872	\$ 643,570	\$ 591,113
KPCO	\$ 246,275	\$ 301,151	\$ 526,997	\$ 556,883	\$ 407,826
OPCO	\$ 741,772	\$ 1,091,531	\$ 1,908,081	\$ 2,010,868	\$ 1,438,063
Total	\$ 3,535,577	\$ 4,397,967	\$ 7,217,984	\$ 7,248,521	\$ 5,600,012
Change					
APCO	\$ 315,347	\$ 254,520	\$ 311,906	\$ 298,232	\$ 295,001
CSP	\$ 153,854	\$ 155,606	\$ 159,574	\$ 260,966	\$ 182,500
I&M	\$ (224,699)	\$ (220,752)	\$ (218,328)	\$ (401,732)	\$ (266,378)
KPCO	\$ 14,180	\$ 13,503	\$ 27,732	\$ 58,634	\$ 28,512
OPCO	\$ (258,762)	\$ (202,869)	\$ (281,088)	\$ (216,234)	\$ (239,738)
Total	\$ (80)	\$ 9	\$ (204)	\$ (134)	\$ (102)

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Table 2 shows the Capacity Cost for the Pool and Standalone cases for each year of the study.

Table 2 – Scenario B

	2010	2011	2017	2018	Average
CAPACITY (\$000)					
Pool in Place (Pool Capacity Payments/Receipts + PJM Capacity Surplus Sale)					
APCO	\$ 379,445	\$ 381,246	\$ 404,563	\$ 334,038	\$ 374,823
CSP	\$ 13,180	\$ (19,580)	\$ 15,365	\$ 41,992	\$ 12,739
I&M	\$ (67,804)	\$ (94,722)	\$ (243,071)	\$ (357,987)	\$ (190,896)
KPCO	\$ 68,534	\$ 59,275	\$ 78,345	\$ 94,253	\$ 75,102
OPCO	\$ (365,322)	\$ (371,246)	\$ (344,291)	\$ (261,172)	\$ (335,508)
Total	\$ 28,032	\$ (45,026)	\$ (89,089)	\$ (148,876)	\$ (63,740)
PJM Standalone(Capacity Based on PJM Market)					
APCO	\$ 66,109	\$ 57,758	\$ 77,000	\$ 41,391	\$ 60,564
CSP	\$ 34,806	\$ 31,244	\$ 71,350	\$ 76,475	\$ 53,469
I&M	\$ 35,916	\$ (21,316)	\$ (89,878)	\$ (131,269)	\$ (51,637)
KPCO	\$ 13,666	\$ 6,307	\$ 6,701	\$ 8,410	\$ 8,771
OPCO	\$ (122,465)	\$ (119,019)	\$ (154,264)	\$ (143,883)	\$ (134,908)
Total	\$ 28,032	\$ (45,026)	\$ (89,089)	\$ (148,876)	\$ (63,740)
Change					
APCO	\$ (313,336)	\$ (323,489)	\$ (327,563)	\$ (292,647)	\$ (314,259)
CSP	\$ 21,627	\$ 50,824	\$ 55,986	\$ 34,483	\$ 40,730
I&M	\$ 103,720	\$ 73,406	\$ 153,193	\$ 226,718	\$ 139,259
KPCO	\$ (54,868)	\$ (52,968)	\$ (71,644)	\$ (85,843)	\$ (66,331)
OPCO	\$ 242,857	\$ 252,227	\$ 190,027	\$ 117,289	\$ 200,600
Total	\$ -	\$ (0)	\$ -	\$ -	\$ (0)

Table 3 shows the SO2 Cost for the Pool and Standalone cases for each year of the study.

Table 3 – Scenario B

	2010	2011	2017	2018	Average
ELIMINATION OF IAA - Net SO2 Cost (\$000)					
Pool in Place					
APCO	\$ (17,765)	\$ (4,313)	\$ (20,435)	\$ (4,816)	\$ (11,832)
CSP	\$ (5,416)	\$ (7,359)	\$ (5,770)	\$ (1,908)	\$ (5,113)
I&M	\$ 6,121	\$ 8,736	\$ 21,254	\$ 19,680	\$ 13,948
KPCO	\$ 4,540	\$ 7,579	\$ (1,517)	\$ (1,808)	\$ 2,199
OPCO	\$ 11,969	\$ 20,551	\$ 8,416	\$ (15,613)	\$ 6,331
Total	\$ (552)	\$ 25,194	\$ 1,948	\$ (4,464)	\$ 5,532
PJM Standalone					
APCO	\$ 2,599	\$ 4,080	\$ (36,207)	\$ (18,632)	\$ (12,040)
CSP	\$ 3,904	\$ 2,275	\$ (15,142)	\$ (24,414)	\$ (8,344)
I&M	\$ 5,227	\$ 4,750	\$ 54,967	\$ 46,284	\$ 27,807
KPCO	\$ 5,130	\$ 4,670	\$ 3,365	\$ 378	\$ 3,386
OPCO	\$ 5,497	\$ 5,094	\$ 1,701	\$ 156	\$ 3,112
Total	\$ 22,357	\$ 20,869	\$ 8,683	\$ 3,772	\$ 13,920
Change					
APCO	\$ 20,364	\$ 8,393	\$ (15,772)	\$ (13,816)	\$ (208)
CSP	\$ 9,320	\$ 9,634	\$ (9,372)	\$ (22,506)	\$ (3,231)
I&M	\$ (894)	\$ (3,986)	\$ 33,712	\$ 26,604	\$ 13,859
KPCO	\$ 590	\$ (2,909)	\$ 4,882	\$ 2,185	\$ 1,187
OPCO	\$ (6,472)	\$ (15,457)	\$ (6,715)	\$ 15,769	\$ (3,219)
Total	\$ 22,909	\$ (4,325)	\$ 6,735	\$ 8,236	\$ 8,389

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Table 4 is the sum of the Net Production component, the Capacity component and IAA component for the Pool and Standalone cases for each year of the study.

Table 4 – Scenario B

TOTAL OF NET PRODUCTION, POOL CAPACITY AND IAA (\$000)						
	2010	2011	2017	2018	Average	
Pool in Place						
APCO	\$ 1,447,250	\$ 1,726,420	\$ 2,595,242	\$ 2,559,922	\$ 2,082,208	
CSP	\$ 607,515	\$ 730,728	\$ 1,270,035	\$ 1,287,387	\$ 973,916	
I&M	\$ 556,022	\$ 622,771	\$ 836,384	\$ 706,995	\$ 680,543	
KPCO	\$ 305,169	\$ 354,502	\$ 576,093	\$ 590,695	\$ 456,615	
OPCO	\$ 647,181	\$ 943,705	\$ 1,853,293	\$ 1,950,317	\$ 1,348,624	
Total	\$ 3,563,137	\$ 4,378,126	\$ 7,131,047	\$ 7,095,315	\$ 5,541,906	
PJM Standalone						
APCO	\$ 1,469,625	\$ 1,665,844	\$ 2,563,813	\$ 2,551,691	\$ 2,062,743	
CSP	\$ 792,317	\$ 946,792	\$ 1,476,222	\$ 1,560,330	\$ 1,193,915	
I&M	\$ 434,149	\$ 471,439	\$ 804,961	\$ 558,585	\$ 567,284	
KPCO	\$ 265,071	\$ 312,128	\$ 537,063	\$ 565,670	\$ 419,983	
OPCO	\$ 624,804	\$ 977,606	\$ 1,755,518	\$ 1,867,141	\$ 1,306,267	
Total	\$ 3,585,966	\$ 4,373,809	\$ 7,137,578	\$ 7,103,417	\$ 5,550,192	
Change						
APCO	\$ 22,375	\$ (60,575)	\$ (31,429)	\$ (8,231)	\$ (19,465)	
CSP	\$ 184,801	\$ 216,064	\$ 206,187	\$ 272,942	\$ 219,999	
I&M	\$ (121,873)	\$ (151,332)	\$ (31,422)	\$ (148,410)	\$ (113,259)	
KPCO	\$ (40,098)	\$ (42,374)	\$ (39,030)	\$ (25,024)	\$ (36,632)	
OPCO	\$ (22,377)	\$ 33,901	\$ (97,775)	\$ (83,176)	\$ (42,357)	
Total	\$ 22,829	\$ (4,317)	\$ 6,531	\$ 8,102	\$ 8,286	

e. Scenario C –Cook Units Outage

Summary of Scenario C

The following table presents the summary results for Scenario C, which simulates the impact on production costs based on an extended outage for both Cook nuclear units. This scenario uses the same market prices as Scenario B (*i.e.*, high market prices). The production cost numbers presented below are the average for the 2010 and 2011. The summary table shows the difference between the Pool and the PJM Standalone cases for Net Production Cost, Capacity and the IAA. Decreases indicate that the Standalone case is more favorable for a particular pool member.

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Summary Table – Scenario C (Average for 2010 and 2011)

\$Millions	Net Production	Capacity	IAA Elimination	Total
APCO	\$ 152	\$ (332)	\$ 12	\$ (168)
CSP	\$ 40	\$ 28	\$ 10	\$ 78
I&M	\$ 71	\$ 123	\$ (3)	\$ 191
KPCO	\$ (3)	\$ (57)	\$ (2)	\$ (62)
OPCO	\$ (261)	\$ 238	\$ (8)	\$ (30)

Additional Specific Assumptions For Scenario C

- Both Cook units are out of service throughout 2010 and 2011
- Pool affiliate transactions are eliminated in the Standalone view
- All short or excess energy is bought and sold in the PJM spot market – no bilateral contracts- in the Standalone view
- PJM Capacity is priced at \$160 MW-Day for 2010 and 2011

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Additional Detail For Scenario C

The following tables present more detailed data for Scenario C.

Table 1 shows the Net Production cost for the Pool and Standalone cases for each year of the study.

Table 1 – Scenario C

	2010	2011	2017	2018	Average
NET PRODUCTION COST (\$000)					
Pool in Place					
APCO	\$ 1,250,877	\$ 1,599,828			\$ 1,425,353
CSP	\$ 690,001	\$ 880,205			\$ 785,103
I&M	\$ 877,822	\$ 1,045,066			\$ 961,444
KPCO	\$ 275,358	\$ 345,777			\$ 310,567
OPCO	\$ 1,153,863	\$ 1,426,606			\$ 1,290,235
Total	\$ 4,247,920	\$ 5,297,482			\$ 4,772,701
PJM Standalone					
APCO	\$ 1,451,800	\$ 1,702,930			\$ 1,577,365
CSP	\$ 740,812	\$ 908,567			\$ 824,690
I&M	\$ 956,466	\$ 1,109,320			\$ 1,032,893
KPCO	\$ 273,692	\$ 342,016			\$ 307,854
OPCO	\$ 825,072	\$ 1,234,327			\$ 1,029,700
Total	\$ 4,247,842	\$ 5,297,161			\$ 4,772,501
Change					
APCO	\$ 200,923	\$ 103,102			\$ 152,013
CSP	\$ 50,811	\$ 28,363			\$ 39,587
I&M	\$ 78,644	\$ 64,253			\$ 71,449
KPCO	\$ (1,665)	\$ (3,760)			\$ (2,713)
OPCO	\$ (328,791)	\$ (192,279)			\$ (260,535)
Total	\$ (78)	\$ (321)			\$ (200)

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Table 2 shows the Capacity Cost for the Pool and Standalone cases for each year of the study.

Table 2 – Scenario C

	2010	2011	2017	2018	Average
CAPACITY (\$000)					
Pool in Place (Pool Capacity Payments/Receipts + PJM Capacity Surplus Sale)					
APCO	\$ 379,445	\$ 410,574			\$ 395,009
CSP	\$ 13,180	\$ (2,923)			\$ 5,128
I&M	\$ (67,804)	\$ (78,053)			\$ (72,928)
KPCO	\$ 68,534	\$ 65,421			\$ 66,977
OPCO	\$ (365,322)	\$ (350,985)			\$ (358,153)
Total	\$ 28,032	\$ 44,034			\$ 36,033
PJM Standalone(Capacity Based on PJM Market)					
APCO	\$ 66,109	\$ 59,334			\$ 62,722
CSP	\$ 34,806	\$ 32,062			\$ 33,434
I&M	\$ 35,916	\$ 64,006			\$ 49,961
KPCO	\$ 13,666	\$ 6,599			\$ 10,132
OPCO	\$ (122,465)	\$ (117,968)			\$ (120,216)
Total	\$ 28,032	\$ 44,034			\$ 36,033
Change					
APCO	\$ (313,336)	\$ (351,239)			\$ (332,288)
CSP	\$ 21,627	\$ 34,985			\$ 28,306
I&M	\$ 103,720	\$ 142,060			\$ 122,890
KPCO	\$ (54,868)	\$ (58,822)			\$ (56,845)
OPCO	\$ 242,857	\$ 233,017			\$ 237,937
Total	\$ -	\$ -			\$ -

Table 3 shows the SO2 Cost for the Pool and Standalone cases for each year of the study.

Table 3 – Scenario C

	2010	2011	2017	2018	Average
ELIMINATION OF IAA - Net SO2 Cost (\$000)					
Pool in Place					
APCO	\$ (14,904)	\$ (3,190)			\$ (9,047)
CSP	\$ (6,079)	\$ (7,669)			\$ (6,874)
I&M	\$ 6,010	\$ 9,937			\$ 7,974
KPCO	\$ 5,443	\$ 9,051			\$ 7,247
OPCO	\$ 10,200	\$ 15,514			\$ 12,857
Total	\$ 671	\$ 23,643			\$ 12,157
PJM Standalone					
APCO	\$ 2,714	\$ 4,153			\$ 3,434
CSP	\$ 3,725	\$ 2,223			\$ 2,974
I&M	\$ 5,386	\$ 4,814			\$ 5,100
KPCO	\$ 5,132	\$ 4,800			\$ 4,966
OPCO	\$ 5,317	\$ 5,000			\$ 5,159
Total	\$ 22,273	\$ 20,991			\$ 21,632
Change					
APCO	\$ 17,617	\$ 7,343			\$ 12,480
CSP	\$ 9,803	\$ 9,893			\$ 9,848
I&M	\$ (625)	\$ (5,123)			\$ (2,874)
KPCO	\$ (311)	\$ (4,251)			\$ (2,281)
OPCO	\$ (4,883)	\$ (10,514)			\$ (7,699)
Total	\$ 21,602	\$ (2,652)			\$ 9,475

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Table 4 shows the summary of the Net Production component, the Capacity component and IAA component for the Pool and Standalone cases for each year of the study.

Table 4 – Scenario C

TOTAL OF NET PRODUCTION, POOL CAPACITY AND IAA (\$000)					
	2010	2011	2017	2018	Average
Pool in Place					
APCO	\$ 1,615,418	\$ 2,007,212			\$ 1,811,315
CSP	\$ 697,102	\$ 869,612			\$ 783,357
I&M	\$ 816,028	\$ 976,950			\$ 896,489
KPCO	\$ 349,334	\$ 420,248			\$ 384,791
OPCO	\$ 798,741	\$ 1,091,136			\$ 944,938
Total	\$ 4,276,623	\$ 5,365,158			\$ 4,820,890
PJM Standalone					
APCO	\$ 1,520,622	\$ 1,766,418			\$ 1,643,520
CSP	\$ 779,343	\$ 942,852			\$ 861,098
I&M	\$ 997,767	\$ 1,178,140			\$ 1,087,954
KPCO	\$ 292,490	\$ 353,415			\$ 322,953
OPCO	\$ 707,924	\$ 1,121,359			\$ 914,642
Total	\$ 4,298,147	\$ 5,362,185			\$ 4,830,166
Change					
APCO	\$ (94,796)	\$ (240,794)			\$ (167,795)
CSP	\$ 82,241	\$ 73,240			\$ 77,741
I&M	\$ 181,739	\$ 201,190			\$ 191,465
KPCO	\$ (56,844)	\$ (66,833)			\$ (61,839)
OPCO	\$ (90,816)	\$ 30,223			\$ (30,297)
Total	\$ 21,524	\$ (2,973)			\$ 9,276

8. OTHER ANALYSES

a. Primary Energy Deliveries Priced Incrementally

At the request of stakeholders, the Company performed an analysis to show the effect on the operating companies if primary energy deliveries to other Pool members are priced at incremental cost of production rather than the average cost of production as is prescribed by the IA.

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	2010	2011	Average
NET PRODUCTION COST (\$000)			
Pool in Place - Avg.			
APCO	\$ 1,085,570	\$ 1,349,487	\$ 1,217,529
CSP	\$ 599,752	\$ 757,667	\$ 678,709
I&M	\$ 617,706	\$ 708,757	\$ 663,231
KPCO	\$ 232,095	\$ 287,648	\$ 259,871
OPCO	\$ 1,000,534	\$ 1,294,400	\$ 1,147,467
Total	\$ 3,535,657	\$ 4,397,958	\$ 3,966,808
Pool in Place - Incremental			
APCO	\$ 1,085,761	\$ 1,346,314	\$ 1,216,038
CSP	\$ 599,371	\$ 755,400	\$ 677,386
I&M	\$ 610,753	\$ 703,962	\$ 657,358
KPCO	\$ 232,458	\$ 287,519	\$ 259,988
OPCO	\$ 1,007,314	\$ 1,304,763	\$ 1,156,038
Total	\$ 3,535,657	\$ 4,397,958	\$ 3,966,808
Change			
APCO	\$ 191	\$ (3,173)	\$ (1,491)
CSP	\$ (381)	\$ (2,266)	\$ (1,324)
I&M	\$ (6,952)	\$ (4,795)	\$ (5,873)
KPCO	\$ 363	\$ (129)	\$ 117
OPCO	\$ 6,780	\$ 10,362	\$ 8,571
Total	\$ 0	\$ 0	\$ 0

b. Modification of the MLR

As described earlier, the IA defines MLR as the ratio of a member's highest NCP in relationship to the total of all members' highest NCP demand for the preceding twelve months. At the request of the parties, an analysis was performed to determine the effects on I&M's Pool components if the FERC approved a change in the definition of the MLR to utilize to a Peak Load Contribution (PLC) method based on the PJM tariff. The PLC method uses the coincident peak for each member company at the time of the PJM system's five highest daily peaks. For PJM the five highest peaks occur in the summer. The year 2010 was evaluated assuming high market prices.

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The table below compares the MLR ratios for 2010 to the PLC ratios.

Operating Company	Allocation Methods		
	Average MLR	Average PLC	Delta
	(1)	(2)	(3)=(2)-(1)
APCO	0.32755	0.29748	(0.03007)
CSP	0.18587	0.20271	0.01684
I&M	0.19023	0.19669	0.00646
KPCO	0.07083	0.05806	(0.01277)
OPCO	<u>0.22552</u>	<u>0.24506</u>	<u>0.01954</u>
Total	1.00000	1.00000	0.00000

Applying PLC instead of MLR to the most significant of the items that are affected by the MLR produces the following results for the Pool members.

2010 Treatment of Pool Payments under Member Load Ratio (MLR) and Peak Load Contribution (PLC)									
All Amounts in \$000									
Operating Company	Member Load Ratio			Peak Load Contribution			Deltas		
	Pool Capacity (4)	OSS Margins (5)	Total (6) = (4)+(5)	Pool Capacity (7)	OSS Margins (8)	Total (9) = (7)+(8)	Pool Capacity (10)	OSS Margins (11)	Total (12) = (10)+(11)
APCO	\$370,803	(\$20,041)	\$350,762	\$240,165	(\$18,125)	\$222,039	(\$130,638)	\$1,916	(\$128,722)
CSP	\$8,035	(\$11,534)	(\$3,499)	\$80,603	(\$12,423)	\$68,180	\$72,568	(\$689)	\$71,679
I&M	(\$73,794)	(\$11,780)	(\$85,573)	(\$44,905)	(\$12,427)	(\$57,332)	\$28,889	(\$648)	\$28,242
KPCO	\$66,617	(\$4,379)	\$62,238	\$11,065	(\$3,616)	\$7,449	(\$55,552)	\$763	(\$54,789)
OPCO	(\$371,661)	(\$13,886)	(\$385,546)	(\$266,928)	(\$15,028)	(\$281,956)	\$84,733	(\$1,142)	\$83,590
Total	\$0	(\$61,619)	(\$61,619)	\$0	(\$61,619)	(\$61,619)	\$0	\$0	\$0

Negative represents a decrease in cost of service.

Note: Peak Load Contribution based on average of individual Operating Company peaks at the times of the 5 daily PJM peaks during the 12 months ended October 2008 (applicable to PJM Planning Year 09/10 for Jan - May 2010) and the 12 months ended October 2009 (applicable to PJM Planning Year 10/11 for Jun - Dec 2010)

c. Plant Retirement Analysis

At the request of the other parties to this proceeding the Company prepared an analysis summarized in the table below which shows how planned retirements affect the relative capacity positions in the AEP Pool between 2010 and 2018. Also shown are the MLRs for these years.

AEP INTERCONNECTION AGREEMENT STUDY- CAUSE NO. 43306

CAPACITY SUMMARY: 2010 AND 2018						
	Dec. 2010 Capacity MW	Dec. 2010 Percent of Capacity	Retirements Through 2018	Rerates and Additions Through 2018	Dec. 2018 Capacity MW	Dec. 2018 Percent of Capacity
APCO	6,449	24%	(635)	1,281	7,095	27%
CSP	4,892	19%	(265)	112	4,739	18%
I&M	5,511	21%	0	519	6,030	23%
KPCO	1,481	6%	0	(48)	1,433	5%
OPCO	8,068	31%	(2,220)	713	6,561	25%
Total	26,401		(3,120)	2,578	25,858	

Member Load Ratio (MLR): 2010 AND 2018		
	Dec. 2010 MLR	Dec. 2018 MLR
APCO	32.6%	33.2%
CSP	18.2%	18.9%
I&M	19.5%	18.7%
KPCO	7.2%	6.9%
OPCO	22.6%	22.3%
Total	100.0%	100.0%

CERTIFICATE OF SERVICE

The undersigned certifies that on December 11, 2009 a copy of the foregoing was served by email transmission upon the following:

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Teresa E. Morton

KENTUCKY POWER COMPANY
 ENVIRONMENTAL SURCHARGE REPORT
 CALCULATION OF E(m) and SURCHARGE FACTOR

As Originally Filed	January 2011	February 2011	March 2011	April 2011	May 2011	June 2011	July 2011	August 2011	September 2011	October 2011	November 2011	December 2011	Total Impact of Pool Dissolution
LINE 1 CRR from ES FORM 3.00	\$4,880,732	\$6,168,875	\$5,748,082	\$5,830,053	\$5,705,345	\$5,506,388	\$4,372,788	\$4,236,648	\$4,019,669	\$3,805,605	\$3,632,110	\$4,788,987	
LINE 2 Br from ES FORM 1.10	\$3,991,163	\$3,590,810	\$3,651,374	\$3,647,040	\$3,922,590	\$3,827,274	\$3,806,325	\$4,088,830	\$3,740,010	\$3,260,302	\$2,786,040	\$4,074,321	
LINE 3 E(m) (LINE 1 - LINE 2)	\$889,569	\$2,578,065	\$2,086,718	\$2,183,013	\$1,782,755	\$1,681,114	\$557,473	\$147,818	\$278,659	\$545,303	\$846,070	\$714,646	
LINE 4 Kentucky Retail Jurisdictional Allocation Factor from ES FORM 3.30, Schedule of Revenues, LINE 1	84.7%	85.1%	79.3%	78.7%	77.6%	72.7%	68.3%	76.2%	79.7%	78.0%	83.3%	83.0%	
LINE 5A KY Retail E(m) (LINE 3 * LINE 4)	\$753,465	\$2,194,784	\$1,662,697	\$1,718,031	\$1,383,418	\$1,387,570	\$387,584	\$112,638	\$222,889	\$428,116	\$704,776	\$593,155	
LINE 5B Environmental Surcharge Clause Adjustment Case No. 2009-00038, dated May 14, 2008	(\$49,885)	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	
LINE 6 (Over)/Under Recovery Adjustment from ES FORM 3.30	(\$877,185)	(\$167,755)	(\$174,930)	\$759,603	\$179,377	\$7,110	(\$235,309)	(\$197,884)	\$5,260	(\$27,551)	\$15,676	(\$122,928)	
LINE 7 Net KY Retail E(m) (LINE 6 + LINE 6)	(\$173,605)	\$2,027,028	\$1,487,768	\$2,477,634	\$1,562,795	\$1,374,680	\$152,275	\$47,519,210	\$44,097,032	\$398,555	\$720,452	\$470,228	
LINE 8 Net KY Retail E(m) (Line 7)	(\$173,605)	\$2,027,028	\$1,487,768	\$2,477,634	\$1,562,795	\$1,374,680	\$152,275	(\$86,246)	\$228,179	\$398,555	\$720,452	\$470,228	
LINE 9 KY Retail R(m) from ES FORM 3.30	\$65,952,346	\$58,755,458	\$44,307,469	\$42,540,201	\$49,424,887	\$46,953,714	\$46,534,433	\$47,519,210	\$44,097,032	\$38,287,502	\$42,852,396	\$50,020,415	
LINE 10 Environmental Surcharge Factor for Expense Month (Line 8 / LINE 9)	-0.2632%	3.4489%	3.3576%	5.8242%	3.8059%	2.9277%	0.3272%	-0.1794%	0.5174%	1.0410%	1.6812%	0.9289%	
As Revised													
LINE 11 CRR from ES FORM 3.00	\$2,714,644	\$4,089,573	\$3,628,792	\$3,734,149	\$3,689,134	\$3,361,797	\$2,187,218	\$2,058,082	\$1,857,476	\$2,265,585	\$2,101,854	\$3,215,311	
LINE 12 Br from ES FORM 1.10	\$3,991,163	\$3,590,810	\$3,651,374	\$3,647,040	\$3,922,590	\$3,827,274	\$3,806,325	\$4,088,830	\$3,740,010	\$3,260,302	\$2,786,040	\$4,074,321	
LINE 13 E(m) (LINE 11 - LINE 12)	(\$1,276,519)	\$498,763	(\$22,582)	\$87,109	(\$223,456)	(\$265,477)	(\$1,618,107)	(\$2,029,968)	(\$1,882,534)	(\$986,717)	(\$684,186)	(\$859,010)	
LINE 14 Kentucky Retail Jurisdictional Allocation Factor, from ES FORM 3.30, Schedule of Revenues, LINE 1	84.7%	85.1%	79.3%	78.7%	77.6%	72.7%	68.3%	76.2%	79.7%	78.0%	83.3%	83.0%	
LINE 15 KY Retail E(m) (LINE 13 * LINE 14)	(\$1,081,212)	\$424,447	(\$17,808)	\$68,555	(\$173,402)	(\$193,022)	(\$1,105,167)	(\$1,548,635)	(\$1,500,378)	(\$777,439)	(\$569,927)	(\$712,978)	
LINE 16B Environmental Surcharge Clause Adjustment Case No. 2009-00038, dated May 14, 2008	(\$49,885)	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	
LINE 16 (Over)/Under Recovery Adjustment from ES FORM 3.30	(\$877,185)	(\$167,755)	(\$174,930)	\$759,603	\$179,377	\$7,110	(\$235,309)	(\$197,884)	\$5,260	(\$27,551)	\$15,676	(\$122,928)	
LINE 17 Net KY Retail E(m) (LINE 15 + LINE 16)	(\$2,008,282)	\$256,691	(\$192,847)	\$828,168	\$5,975	(\$184,982)	(\$1,340,476)	(\$1,744,719)	(\$1,495,089)	(\$905,000)	(\$554,251)	(\$655,005)	
LINE 18 Net KY Retail E(m) (Line 17)	(\$2,008,282)	\$256,691	(\$192,847)	\$828,168	\$5,975	(\$184,982)	(\$1,340,476)	(\$1,744,719)	(\$1,495,089)	(\$905,000)	(\$554,251)	(\$655,005)	
LINE 19 KY Retail R(m) from ES FORM 3.30	\$65,952,346	\$58,755,458	\$44,307,469	\$42,540,201	\$49,424,887	\$46,953,714	\$46,534,433	\$47,519,210	\$44,097,032	\$38,287,502	\$42,852,396	\$50,020,415	
LINE 20 Environmental Surcharge Factor for Expense Month (Line 18 / LINE 19)	-3.0451%	0.4389%	-0.4352%	1.8468%	0.0148%	-0.3889%	-2.8805%	-3.6716%	-3.3885%	-2.1025%	-1.2934%	-1.6513%	
LINE 21 Difference (Line 18 - Line 8)	\$(1,834,677.00)	\$(1,770,337.00)	\$(1,680,605.00)	\$(1,548,476.00)	\$(1,555,820.00)	\$(1,500,972.00)	\$(1,492,751.00)	\$(1,658,473.00)	\$(1,723,268.00)	\$(1,203,555.00)	\$(1,274,703.00)	\$(1,306,134.00)	\$ (16,131,534.00)
													\$ (16,131,534.00)

Kentucky Power Company

REQUEST

Refer to Kentucky Power's response to Staff's First Request, Item 1. Article 8 of the AEP System Interim Allowance Agreement states, "[t]his Agreement shall continue in effect from the effective date until the effective date of any subsequent agreement." Have either Kentucky Power or AEP contemplated a subsequent Interim Allowance Agreement and, if so, what form will it take.

RESPONSE

Neither Kentucky Power nor AEP are presently contemplating any subsequent allowance agreement and no such agreement has been filed with FERC given the provisions of the proposed Power Cost Sharing Agreement.

WITNESS: Ranie K Wohnhas

Kentucky Power Company

REQUEST

Refer to Kentucky Power's response to Staff's First Request, Item 4, which states that "[t]he overall scope and cost of the [Big Sandy Unit 1] environmental retrofit was deemed uneconomic due to the high cost and small capacity of the unit." Provide the type of environmental retrofit technology that Kentucky Power considered for Big Sandy Unit 1 and the estimated cost of that environmental retrofit on a total basis and on a per kW basis.

RESPONSE

Kentucky Power considered Dry FGD NID technology coupled with an SCR. The estimated cost was \$198,531,800 or approximately \$720 per kW. The retrofitted unit would have required 1.7 lb SO₂/MMbtu coal.

WITNESS: Ranie K. Wohnhas

Kentucky Power Company

REQUEST

Refer to Kentucky Power's response to Staff's First Request, Item 7. Explain how Kentucky Power's 2011 Environmental Compliance Plan would differ if Kentucky Power had begun the installation of a scrubber at Big Sandy Unit 2 in 2004 or 2005 and whether the scrubber technology at that time would have allowed Kentucky Power to meet the then newly established Clean Air Interstate Rule and/or Clean Air Mercury Rule requirements.

RESPONSE

Had the Company begun the installation of a scrubber at Big Sandy Unit 2 in 2004 or 2005, a wet flue gas desulfurization (WFGD) system would have been installed. The WFGD would have required a waste water treatment (WWT) facility for a chloride purge stream, an extensive dewatering system, and a dry sorbent injection (DSI) system to mitigate SO₃. These systems are not required for the currently proposed dry flue gas desulfurization (DFGD) system.

To the Company's knowledge, the WFGD and its associated technologies would have allowed Kentucky Power to meet the then newly established Clean Air Interstate Rule and the Clean Air Mercury Rule requirements.

WITNESS: John M McManus and Robert Walton

Kentucky Power Company

REQUEST

Refer to Kentucky Power's response to Staff's First Request, Item 15. Provide the estimated annual cost of the four environmental projects at other AEP facilities that are expected to be incorporated into Kentucky Power's environmental compliance recovery mechanism along with the Capital Improvement Requisitions ("CI") approved by the respective AEP Subcompany Board for each of the four environmental projects.

RESPONSE

The estimated annual cost of the four environmental projects at other AEP facilities that are expected to be incorporated into KPCo's environmental compliance recovery mechanism is estimated to be \$306,612, which includes an amount for the capacity investment as well as operations expenses and 50% of maintenance expenses, per the pool agreement. Please see Attachment 1 of the Company's response to KPSC 2-23 for support.

The Capital Improvement Requisitions approved by the respective AEP Subcompany Board for each of the four environmental projects that are already in service are attached as pages 2 through 21 to this response.

WITNESS: Lila P Munsey



CAPITAL PROJECT APPROVAL REQUISITION

Company: Ohio Power **Project Number:** AMP001153
Authorization Type: Capital Improvement **Version Number:** 4

Business Line: Generation
Location: Amos Plant Unif-3 Ash Pond
Project Title: Amos-3 Ash Disposal Project
Business Reason: Environmental Regulations
Brief Description: The approval of this requisition will enable completion of engineering, material acquisition, construction, and commissioning activities for the project to provide adequate fly ash disposal means for Amos Unit-3. A conversion to a totally dry ash handling system is being installed to allow for the closure of the AM-3 fly ash pond outlet -001 by the end of 2010. The total estimated cost of this project is \$75.3M.
Regulatory Cost Recovery: OPCo is permitted to seek a return on incremental environmental expenses through 2011 under the 2009 Ohio ESP order.

Project Start: 8/1/2007 Completion: 3/31/2011 In-Service: 12/31/2010
Dates:

Expenditure to be Authorized (fully loaded)			
	Capital (\$)	Removal (\$)	Total (\$)
Previously Approved Amount	25,911,334	0	25,911,334
This Submission	24,452,054	0	24,452,054
Total (\$)	50,363,388	0	50,363,388

Required Signatures

Authorization Limits	Title	Approver	Signature	Date
amt < \$ 10m	Senior Vice President or Operating Company President	McCullough, M.	_____	_____
\$ 10m ≤ amt < \$ 20m	President AEP Transmission or President AEP Utilities/COO/EVP	Akins, N.	_____	_____
amt ≥ \$ 20m	Chairman, President & CEO	Morris, M.	_____	_____
CP&B Review	Senior Vice President	Dieck, L.	_____	_____

2010 Direct Cost Budget Availability for this Authorization: \$34.78M In Budget \$ _____ Offset
 If offset, indicate source and amount:
 Requested future year amounts are included in or offset within the Strategic Plan Capital Forecast.



CAPITAL PROJECT APPROVAL REQUISITION

Cash Flow (fully loaded)

Year	Prior Years	2010	2011	2012	Future Years	Total (\$)
Capital	18,852,680	29,951,190	1,559,518	0	0	50,363,388
Removal						0
Total to be Authorized	18,852,680	29,951,190	1,559,518	0	0	50,363,388
Assoc. O & M	639,071	0	0			639,071

Note: Associated O & M is not approved with this requisition. Operating & Maintenance dollars are assumed to be in budget or offset in the year spent.

Financial Analysis Summary

This option for ash disposal was determined to be the lowest capital cost among the 11 options considered based on economic analysis and risk impact evaluation.

Reason for Revision

Approximately 90% of the engineering and material procurement activities are complete, while more than 70% of the construction is still required to be finished for the project. This CI revision is required to secure funds to complete material procurement and construction activities for the new dry fly ash system. Additional construction resources could not be secured under the currently approved CI funding which was primarily for engineering and long lead time equipment only. It is anticipated that the project can be completed for this amount and no additional CI revision request will be required.

Project Justification

- 1) Fly Ash disposal for Amos 3 will reach the fly ash pond design life capacity by 2012.
- 2) The current environmental concern involves the 8.6 MGD discharge to Little Scary Creek (outlet -001) meeting the selenium and whole effluent toxicity levels as set by the West Virginia Department of Environmental Protection (WVDEP). Treatment for this volume of effluent has been estimated as high as \$197M.
- 3) Conversion to a totally dry ash handling system eliminates risks associated with additional capital investment to continue with use of the existing fly ash pond system for ash disposal.
- 4) These improvements were determined by a multi-discipline team to be the least total cost compared to all other alternatives, including consideration of risks and opportunity.

Other Alternatives Considered

A study was conducted from April to July, 2007 to evaluate all options available for the transport and disposal of Amos-3 fly ash. A multi-discipline and multi-organizational team originally recommended a semi-dry pumping system as a replacement for the existing dilute-solution sluicing system. The semi-dry system would utilize the existing fly ash pond for ash disposal and allow for the elimination of outlet -001 and hence allow conformance with environmental NPDES limitations at outlet -001.

The semi-dry project was presented to the PMRG on January 20, 2009 to seek approval to begin detailed engineering/design. Recalling the failure of the ash impoundment dam at the TVA Kingston facility in



CAPITAL PROJECT APPROVAL REQUISITION

December 2008, the PMRG requested that the team further explore the dry disposal option. On February 19, 2009 the dry alternative was recommended to the PMRG and approved.

Conclusion

The recommended dry fly ash alternative is the least capital cost option, as compared to the other alternatives. Construction began in March 2009 and the ash storage silo installation work is complete. These funds are required to complete construction of the new dry ash handling system, construction of the fly ash pond reclaim water system and closure of the -001 outfall.

Associated / Future Projects

Future projects to be funded under separate Capital Improvement requests or other funding means include: 1) Completion of a new haul road to the existing FGD landfill for ash disposal; 2) Permanent closure of the fly ash pond.

Project Contacts

Contact	Name	Telephone
Project Manager	Karl Adams	200-2084
Requisition Detail Provider	Karl Adams	200-2084



CAPITAL PROGRAM APPROVAL REQUISITION

Company: AEP System **Program Number:** WWT4HGRED
Authorization Type: Capital Program **Version Number:** 2 Rev 2d

Business Line: Generation
Location: Various Generating Plant Locations
Project Title: Mercury Reduction in the FGD Chloride Purge Stream – Phase 2
Business Reason: Regulatory and Other Compliance
Brief Description: This Program Improvement Requisition requests funding for Phase 2 (final) of the project which includes the engineering, design, procurement and installation of WWT CPS mercury reduction systems at the Cardinal, Conesville, Amos and Mountaineer plants.
 Funding for permanent in-pond mercury reduction systems at the Mitchell, Amos and Mountaineer plants is also requested as the pilot testing at Mitchell was successful in further reducing mercury concentrations.
 Permit In-service dates:
 Mitchell – 5/4/2010
 Cardinal – 12/1/2010
 Conesville – 12/13/2010
 Amos – 3/9/2011
 Mountaineer – 7/10/2011

Regulatory Cost Recovery: See the Regulatory Cost Recovery Section.

Project Dates:	Start: 8/1/2009	Completion: Various (See Above)	In-Service: Various (See Above)
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Expenditure to be Authorized (fully loaded)			
	Capital (\$)	Removal (\$)	Total (\$)
Previously Approved Amount	4,939,039	0	4,939,039
This Submission	12,971,484	0	12,971,484
Total (\$)	17,910,523	0	17,910,523

Required Signatures

Authorization Limits	Title	Approver	Signature	Date
amt < \$ 10m	Senior Vice President or Operating Company President	McCullough, M.	_____	_____
\$ 10m ≤ amt < \$ 20m	President AEP Transmission or President AEP Utilities/COO/EVP	Akins, N.	_____	_____
amt ≥ \$ 20m	Chairman, President & CEO	Morris, M.	_____	_____
CP&B Review	Director	Martin, J.	_____	_____

2010 Direct Cost Budget Availability for this Authorization: \$9.1 In Budget \$2.6 Offset
 If offset, indicate source and amount: MT LBR Vertical Expansion
 Requested future year amounts are included in or offset within the Strategic Plan Capital Forecast.



CAPITAL PROGRAM APPROVAL REQUISITION

Cash Flow (fully loaded)

Year	Prior Years	2010	2011	Future Years	Total (\$)
Capital	\$323,757	\$11,802,440	\$5,784,326	0	\$17,910,523
Removal	0	0	0	0	0
Total to be Authorized	\$323,757	\$11,802,440	\$5,784,326	0	\$17,910,523
Assoc. O & M	0	0	0	0	0

Note: Associated O & M is not approved with this requisition. Operating & Maintenance dollars are assumed to be in budget or offset in the year spent.

Financial Analysis Summary

Parameter	IRR	NPV	Payback Period	Discount Rate Used
Result	NA	NA	NA	NA

Note: These results must match all background information.

Program CI's

CI Number	Operating Company	Previously Approved Amount (\$)		This Submission (\$)		Subtotal (\$)		Total (\$)
		Capital	Removal	Capital	Removal	Capital	Removal	
000016400	OPCo	4,003,000	0	(1,832,520)	0	2,170,480	0	2,170,480
000016401	Cardinal Oper Co	0	0	0	0	0	0	0
000016402	OPCo	90,825	0	754,905	0	845,730	0	845,730
000016403	BPCo	181,676	0	1,486,004	0	1,667,680	0	1,667,680
000016404	APCo	190,750	0	1,735,296	0	1,926,046	0	1,926,046
000016405	OPCo	81,750	0	480,948	0	562,698	0	562,698
000016406	APCo	272,500	0	2,219,531	0	2,492,031	0	2,492,031
000018350	CPSCo	118,538	0	987,433	0	1,105,971	0	1,105,971
000019861	OPCo	0	0	1,718,121	0	1,718,121	0	1,718,121
000019682	APCo	0	0	2,706,753	0	2,706,753	0	2,706,753
000019683	APCo	0	0	2,100,270	0	2,100,270	0	2,100,270
000019684	OPCo	0	0	614,743	0	614,743	0	614,743
Subtotal (\$)		4,939,039	0	12,971,484	0	17,910,523	0	17,910,523
Total AEP Portion (\$)*		4,757,363	0	11,485,480	0	16,242,843	0	16,242,843

* Excludes the Buckeye Power portion of Cardinal Plant



CAPITAL PROGRAM APPROVAL REQUISITION

Version 2

Project Justification

The current NPDES permits for Mitchell, Mountaineer, Amos, Cardinal, and Conesville Plants contain water quality effluent limitations for mercury that are required to be met during 2010 to 2011. At these facilities, the mercury limits have been established at or below 12 ppt at their outfalls.

Pilot testing of mercury reduction technologies was conducted at Mountaineer Plant from July 2008 to December 2008. The most significant finding of the pilot test was that the mercury being discharged from the Chloride Purge Stream (CPS) in the Waste Water Treatment Plant (WWTP) could be significantly decreased (~80-90% reduction) by injecting an organo-sulfide chemical with an optimized coagulant feed upstream of the WWTP primary clarifiers. The increased mercury removal rate is primarily due to the capture and settling of mercury bound to fine suspended solid particles in the CPS effluent. Using Mitchell Plant as an example, the existing CPS WWTP discharge contains mercury concentrations in the range of 1000 - 2000 ppt. With the chemical optimization in the CPS WWTP, it has been demonstrated that mercury concentration in the effluent stream can be reduced to < 200 ppt, but could not achieve the required <12 ppt.

As noted above, mercury reduction at the CPS WWTP alone was not sufficient to comply with NPDES limits at pond outfalls. Mitchell, Mountaineer, and Amos will require mercury reduction in the other streams that enter the pond system. The removal mechanism for mercury for in-pond treatment is similar to the organo-sulfide and coagulant injection at the CPS WWTP where fine particles containing mercury will settle out in the ponds and are retained in the sludge rather than being discharged to the permitted outfall. In-pond treatment requires chemical injection systems, a recirculation system for coagulant dilution, and potential modification of the ponds to improve chemical distribution and increase effective retention to enhance settling of solids. A temporary in-pond treatment pilot test at the Mitchell Plant has demonstrated reduction in mercury to the 12 ppt level. Based on these results, permanent in-pond treatment systems at Mitchell, Mountaineer and Amos will be installed prior to the permit deadlines.

In-pond treatment at the Cardinal and Conesville Plants is not practical due to differences in the plant configuration. Due to the location of the outfalls, effluent is diluted and at this time it is expected permit requirements will be met. If additional mercury reduction is required it will be addressed using different technology or modifications.

Installation of the organo-sulfide and coagulant injection systems in the CPS WWTP and bottom ash pond is in progress at the Mitchell Plant with a compliance operational date of 5/4/2010. The compliance operational dates are 3/9/2011 for Amos Units 1-3, 12/1/2010 for Cardinal Units 1-3, 12/13/2010 for Conesville U4, and 7/10/2011 for Mountaineer.

Program funding is being requested for the second phase of this program:

Phase II: \$13.0M

- a. Complete engineering, design, procurement and installation of organo-sulfide and coagulant chemical treatment of the CPS in the WWTP at the Mountaineer, Amos, Conesville, and Cardinal Plants.
- b. Complete engineering, design, procurement and installation of organo-sulfide and coagulant chemical injection systems for in-pond treatment at the Mitchell, Mountaineer, and Amos Plants. This includes potential pond configuration changes to enhance chemical distribution and solids sedimentation.



CAPITAL PROGRAM APPROVAL REQUISITION

Other Alternatives Considered

Alternatives to Organo-Sulfide Chemical Treatment in CPS WWTP:

Pilot testing of mercury reduction technologies conducted at Mountaineer during 2008 included evaluation of the following technologies: ultrafiltration; mercury selective ion-exchange resin; and bioreactors. The direct equipment costs of these technologies range from \$1.2 million to \$5.45 million for a 350gpm system. Installation costs, balance of plant upgrades and overheads would greatly increase these costs. Additionally, each technology would require more footprint space than is currently available in the existing CPS WWTP buildings. The success of these technologies to reliably reduce mercury in the CPS WWTP to levels below 12 ppt was not demonstrated during the Mountaineer Pilot test. The ultrafiltration units employed by two of the vendors would not remain in service for extended time periods. The test units failed within two weeks of operation. While ion-exchange resin and bioreactor technologies showed promise of being able to produce an effluent mercury concentration of less than 12 ppt, each technology requires a fully operational ultrafiltration unit to remove suspended and colloidal mercury. Further pilot testing is required to find a filtration technology that may provide reliable service in addition to removing suspended and colloidal mercury from the effluent stream. The recommendation to install organo-sulfide chemical treatment of the CPS WWTP is based upon observations that an 80-90% reduction of mercury is reliably achieved with the application of this technology.

The primary O&M costs associated with the chemical treatment in the CPS WWTP are the organo-sulfide and coagulant chemical costs. Annual costs are expected to range from \$50,000 to \$100,000 at each site.

Alternatives to In-Pond Treatment:

Alternative technologies to in-pond treatment that were considered are identical to those listed for the CPS WWTP. The most significant difference is that individual treatment of mercury containing streams entering the pond complexes have combined flow rates in excess of 6 million gallons per day. This is a flow rate approximately 12 times higher than the flow rate used for the cost basis of the alternative technologies considered for the CPS WWTP. A large volume flow rate would require a new treatment facility with a footprint much larger than any plant currently has available. In-pond chemical treatment has shown significant promise in laboratory testing and given the space constraints of the alternatives it may be the only viable option for Mitchell, Mountaineer and Amos Plants. The in-pond pilot test at Mitchell confirmed laboratory testing and appears to be a cost effective means of further reducing mercury concentrations at Mitchell, Mountaineer, and Amos pond outfalls.

Similarly, the primary O&M costs with the in-pond treatment at Mitchell, Amos and Mountaineer will be the organo-sulfide and coagulant chemical costs. Costs will be dependant on the pond inflows, which can range between 3 to 9 millions gallons per day. An average annual cost of \$600,000 is expected at each site.

No Action Option:

The option of taking no action was considered. Taking no action would result in violations of effluent limitations and other provisions of the facility's National Pollutant Discharge Elimination System (NPDES) permit. These violations are subject to enforcement action by the state permitting agency or U.S. EPA which can include civil penalties allowed under the Clean Water Act of up to \$32,500 per day per violation. More significant penalties exist for knowing violations of the permit.

Conclusion

To meet the NPDES permit requirements, the aforementioned mercury reduction technologies must be installed.

Associated / Future Projects



CAPITAL PROGRAM APPROVAL REQUISITION

The latest Mountaineer NPDES permit identifies three primary issues regarding effluent to the river – mercury, selenium, and storm water metals concentration. The selenium issue is being addressed via the installation of a bio-reactor technology. Storm water concerns continue to be evaluated but the source and treatment of metal concentrations has not been fully identified. The development of a storm water solution may potentially interact with the mercury and selenium reduction approaches.

Regulatory Cost Recovery:

Fleet Wide Mercury Reduction Program - \$17.9M (in-service 5/4/10 through 7/10/11 depending on plant site)

- \$4.15M (45%) APCo VA Base Case, TYE TBD; effective TBD. Recovery of deferred costs under Environmental Rate Adjustment Clause (E-RAC), if filed.
- \$3.97M (43%) APCo WV Base Case, TYE TBD; effective TBD
- \$0.55M (6%) KgPCo Purchased Power Pass-Through from APCo under three year settlement agreement phase-in of generation rates.
- \$0.55M (6%) FERC Annual Formula Rate Update, TYE 12/31/11; effective 6/1/12
- \$5.91M (100%) OPCo is permitted to seek a return on incremental environmental expenses through 2011 under the 2009 Ohio ESP order. Pursuant to this provision of the ESP, cost incurred through 12/31/10 will be included in an Environmental Investment Carry Cost Rider (EICCR) filing in early 2011. Recovery of these costs will commence on 7/1/11 if approved by the PUCO.
- \$1.11M (100%) CSP is permitted to seek a return on incremental environmental expenses through 2011 under the 2009 Ohio ESP order. Pursuant to this provision of the ESP, cost incurred through 12/31/10 will be included in an Environmental Investment Carry Cost Rider (EICCR) filing in early 2011. Recovery of these costs will commence on 7/1/11 if approved by the PUCO.
- \$1.67M (5%) Buckeye - Costs recovered per Buckeye rates

Project Contacts

Contact	Name	Telephone
Project Manager	Edward V. Gilabert	200-1765
Requisition Detail Provider	Ron Jacobs	200-3675



CAPITAL PROGRAM APPROVAL REQUISITION

Company: AEP System **Program Number:** ACICAMR00

Authorization Type: Capital Program **Version Number:** 4

Business Line: Generation

Location: Multiple Generating Plant Locations

Project Title: Activated Carbon Injection Program

Business Reason: Environmental, Safety and Health

Brief Description: Complete the Activated Carbon Injection System (ACIS) Program for reduction of mercury emissions at Rockport generation plant only. After the CAMR was vacated by the DC Appeals Court on Feb. 8, 2008, the installation of ACIS islands at the following seven plants have been suspended, pending new legislation: Northeastern, Sporn, Clinch River, Kammer, Tanners Creek, Pirkey and Oklaunion.

Regulatory Cost Recovery: See Page 3

Project Dates:	Start: 12/01/2006	Completion: 01/01/2010	In-Service: 01/01/2010
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Expenditure to be Authorized (fully loaded)			
	Capital (\$)	Removal (\$)	Total (\$)
Previously Approved Amount	170,000,000	0	170,000,000
This Submission	-134,667,408	0	-134,667,408
Total (\$)	\$35,332,592	\$0	\$35,323,592

Required Signatures

Authorization Limits	Title	Approver	Signature	Date
amt < \$ 10m	Senior Vice President or Operating Company President	McCullough, M.	_____	_____
\$ 10m ≤ amt < \$ 20m	President AEP Transmission or President AEP Utilities/COO/EVP	Akins, N.	_____	_____
amt ≥ \$ 20m	Chairman, President & CEO	Morris, M.	_____	_____
CP&B Review	Senior Vice President	Dieck, L.	_____	_____

2009 Direct Cost Budget Availability for this Authorization: \$16.2M In Forecast \$ N/A Offset

If offset, indicate source and amount:

Requested future year amounts are included in or offset within the Strategic Plan Capital Forecast.



CAPITAL PROGRAM APPROVAL REQUISITION

Cash Flow (fully loaded)

Year	Prior Years	2009	2010	2011	Future Years	Total (\$)
Capital	21,881,911	13,450,681	0			35,332,592
Removal						
Total to be Authorized	21,881,912	13,450,681	0			35,332,592
Assoc. O & M						

Note: Associated O & M is not approved with this requisition. Operating & Maintenance dollars are assumed to be in budget or offset in the year spent.

Financial Analysis Summary

The decision to install this technology was made in the context of an AEP system wide environmental compliance analysis which identified that this project was a critical element in achieving the least cost compliance plan to meet current and future emission regulations. The analysis was conducted using the multi-emissions compliance optimization model (MECO), a unique mixed integer programming model which solves for the least cost environmental compliance plan. The model considers power and emission allowance markets, load demand forecast, emission allowance balances, emission control retrofit costs, new unit costs, unit emission rates, and unit operating costs. This proprietary model is a sophisticated analytic tool that allows the company to systematically weigh costs and risks of a wide variety of options and allows simultaneous optimization across multi-emissions (SO₂, NO_x, mercury and CO₂).

Program CIs

CI Number	Operating Company/Plant	Previously Approved Amount (\$)		This Submission (\$)		Subtotal (\$)		Total Cost (\$)
		Capital	Rem	Capital	Rem	Capital	Rem	
RK001ACIA	AEG – Rockport	12,297,644	0	1,446,146	0	13,743,790	0	13,743,790
RK001ACID	I&M – Rockport	12,297,644	0	1,446,146	0	13,743,790	0	13,743,790
TC001ACID	I&M -Tanners Crk	35,392,076	0	-35,235,489	0	156,587	0	156,587
SP001ACIA	APCO -Sporn 1,3	9,491,227	0	-9,330,363	0	160,864	0	160,864
SP001ACID	OPCO - Sporn 2,4	9,491,227	0	-9,330,363	0	160,864	0	160,864
CR001ACID	APCO - Clinch River	19,054,784	0	-19,019,440	0	35,344	0	35,344
PRK01ACID	SWPECO - Pirkey	17,005,445	0	-12,299,438	0	4,706,007	0	4,706,007
NE003ACID	PSO - Northeastern	18,924,694	0	-16,377,911	0	2,546,783	0	2,546,783
OKL01ACID	PSO - Oklaunion	3,750,178	0	-3,745,404	0	4,774	0	4,774
OKN01ACID	TNC - Oklaunion	13,296,085	0	-13,279,159	0	16,926	0	16,926
KM001ACID	OPCO - Kammer	18,998,996	0	-18,942,133	0	56,863	0	56,863
Total Cost(\$)		170,000,000	\$0	-134,667,408	\$0	35,332,592	\$0	35,332,592

Version 4: Project Justification

Approval of Version 4 of CI ACICAMR00 will authorize the reduction of \$134,667,408 from the ACIS Program funding. On Feb. 8, 2008, the District of Columbia Circuit Court of Appeals issued a decision which vacated the EPA's Clean Air Mercury Rule (CAMR). The CAMR required that coal-fired power plants regulate mercury emissions. The 2010 CAMR compliance deadline no longer applies. A new deadline under the previous Maximum Achievable Control Technology (MACT) standard now requires



CAPITAL PROGRAM APPROVAL REQUISITION

new rulemaking. AEP Management has decided to suspend and no longer fund the ACIS Program activities at Pirkey, Sporn, Clinch River, Tanners Creek, Kammer, Northeastern, and Oklaunion. The Program is continuing at Rockport. Activated carbon injection for mercury control is widely accepted in the industry as a viable technology and it is likely to be a part of our future fleet compliance plan. Continuing with this ACIESP project will demonstrate the capability of this technology on a long-term basis and will result in data that will be of value both to AEP's future compliance planning effort and to AEP as we work with EPA when new mercury rulemaking begins. Once new mercury regulations have been approved, a determination will be made of the costs spent to date on the suspended projects and they will either be completed or expensed.

Version 3 authorized the total required funding of \$170,000,000 for implementation of the ACIS Program consistent with the AEP Environmental Compliance Plan to meet Phase I of the Clean Air Mercury Rule (CAMR) requirements.

Versions 1 and 2 of this requisition authorized the Phase I feasibility studies and the Phase IIA conceptual engineering/design phase of this project, respectively.

Other Alternatives Considered

The MECO model was used to evaluate alternatives, such as the addition of a pulse-jet baghouses, SCR/WFGD combinations, and ACI ESP for mercury capture. With the large capital investment required for baghouse or SCR/WFGD installations, ACI ESP was selected as the least-cost option for mercury removal at these plants. The program team continues to investigate the least cost implementation of the overall ACIS Program. The areas of investigation that are considered by the team to have a potential to impact the total program scope include coal washing and/or possible coal/boiler additives at selected units. Further program adjustments may also result from comparing actual Hg monitoring data to baseline data to optimize the ACI program selection.

Conclusion

The 2010 CAMR compliance deadline no longer applies. A new deadline under the previous Maximum Achievable Control Technology (MACT) standard now requires new rulemaking. AEP Management has decided to suspend and no longer fund the ACIS Program with the exception of Rockport plant. This project is an integral part of AEP's Mercury Compliance Strategy and will be required to attain the expected fleet-wide compliance targets. In March 2005, the US EPA issued the Clean Air Mercury Rule (CAMR) to Cap and Reduce mercury emissions from coal-fired power plants. These nine units have been considered for mercury control as a part of AEP's mercury compliance strategy. Significant mercury co-benefit reductions are expected through the fleet-wide addition of SCR and FGD equipment prior to 2010. However, additional mercury reductions will be required on non-FGD/SCR plants to meet the fleet target.

Regulatory Cost Recovery

Costs incurred due to the installation of ACI at the Rockport plant will be recovered as defined by the outcome of I&M's planned application for a Certificate of Public Convenience and Necessity (CPCN). The petition for the CPCN is expected to be filed in early 2009, with a decision from the Indiana Commission likely to follow approximately six months later. Because ACI will reduce mercury at the Rockport plant it qualifies as Clean Coal Technology under Indiana code. Capital and O&M for Clean Coal Technology projects are eligible for financial incentives and timely cost recovery as determined by the Commission through CPCN hearings.

The work orders for the remaining projects will be suspended in accordance with the AEP Property Accounting procedure that will halt accumulation of AFUDC until the project is resumed. For work order charges <\$50K (Oklaunion-PSO, Oklaunion-TNC, & Clinch River), work orders will need to be reviewed to determine proper accounting (e.g. take no action, expense, close existing charges); work order charges >\$50K will remain in construction work in progress (CWIP) or need to be reclassified depending upon the amount and projected time of suspension. Carrying charges on CWIP at Sporn U1&3 and



CAPITAL PROGRAM APPROVAL REQUISITION

Clinch River will be sought in the VA E&R proceeding. Other CWIP or reclassified amounts will be recovered through base rate proceedings in the applicable jurisdiction if the projects are completed.

Project Contacts

Contact	Name	Telephone
Project Manager	Jennifer Watters	200-1277
Requisition Detail Provider	Jennifer Watters	200-1277

Capital Program Approval Requisition

Company: AEP System **Version 3**

Project: AEPSNCR00 Revision - Selective Non-Catalytic Reduction East Installation and Feasibility Study Multiple Locations

Description: AEP's New Source Review (NSR) consent decree settlement required AEP to install Selective Non-Catalytic Reduction (SNCR) at Clinch River Units 1-3 by 12/31/2009. Version 1 requested funding for the Clinch River SNCR by 12/31/2008 to support AEP compliance with the fleet 2009 NOx cap. The version also requested funding for Sporn Units 3 and 4 to convert existing temporary SNCR installations to permanent operational SNCR systems by 12/31/2008 and technical feasibility studies for Tanners Creek, Big Sandy and Kanawha River SNCR.

Version 2 of the SNCR Program was approved in 2008 with funding to complete the SNCR and SO₂ Systems at Clinch River, complete the conversion from temporary to permanent for the Sporn 3 & 4 SNCR, and design and install an SNCR System for Tanners Creek 1-3. Version 2 also included the design and installation of SNCR Systems for Big Sandy 1 and Conesville 5 & 6 and feasibility studies for Tanners Creek 4, Kammer 1-3, and Muskingum River 1-4.

Reason for Revision: The SNCR program is now complete, but requires a revision to close the program due to the scope change within the program. The scope and strategy of the SNCR Program was modified to eliminate SNCR installations at Conesville 5 & 6 and Big Sandy 1 as well as feasibility studies for Tanners Creek 4, Kanawha River 1-2, Kammer 1-3, and Muskingum River 1-4. The funds allotted for these eliminated projects were used within the program to help mitigate accelerated in service dates, extended start-up periods and additional scope not addressed in the previous version.

Authorization Amount:

Company	Previously Approved Amount	This Submission	Total Amount to be Authorized
APCo	24,214,270	13,644,282	37,858,552
I&M	11,529,186	2,623,058	14,152,244
KYPCo	5,543,667	(5,543,667)	-
OPCo	12,068,067	(9,728,917)	2,339,150
Total	\$ 53,355,190	\$ 994,756	\$ 54,349,946

Cash Flow:

	Prior Years	2012	2013	Future Years	Total
Capital	\$ 54,225,989	\$ -	\$ -	\$ -	\$ 54,225,989
Removal	\$ 123,957	\$ -	\$ -	\$ -	\$ 123,957
Total to be Authorized	\$ 54,349,946	\$ -	\$ -	\$ -	\$ 54,349,946
Associated O&M	\$ -	\$ -	\$ -	\$ -	\$ -

Start Date: 5/1/2005 **Completion Date:** Various **In Service Date:** Various through 12/9/10

Capital Program Approval Requisition

Company: AEP System

Version 3

Project: AEPSNCR00 Revision - Selective Non-Catalytic Reduction East Installation and Feasibility Study
 Multiple Locations

Continuation from prior page

Regulatory Cost Recovery: Appalachian Power Company -- Generation - \$37.86M (70.0%)
 > \$17.79M (47%) APCo VA base rate case filing, TYE 12/31/10, with cost projections through 11/30/12, effective date 1/31/12; or through deferral of expenditures for recovery under the Environmental Rate Adjustment Clause (E-RAC) TYE 12/31/10, effective 1/31/12
 > \$16.28M (43%) APCo WV base rate case filing, TYE 12/31/09 with 12-month post-TY adjustment for major projects, effective 3/31/11
 > \$2.27M (6%) KgPCo purchased power pass-through from APCo under three-year settlement agreement phase-in of generation rates through 12/31/11
 > \$1.54M (4%) FERC Annual Formula Rate Update, TYE 12/31/10, effective 6/1/11

Indiana Michigan Power Company -- Generation - \$14.15M (26%)
 > \$9.20M (65%) I&M-IN Clean Coal Technology Rider, biannual filings Test Year End (TYE) Dec/June, effective July/Jan until included in base rate filing, TYE 3/31/11, effective 9/1/12
 > \$2.12M (15%) I&M MI base rate case filing, TYE 12/31/10 with projections through 12/31/12, effective 1/1/12
 > \$2.83M (20%) FERC Annual Formula Rate Update, TYE 12/31/10, effective 6/1/11

Ohio Power Company -- Generation - \$2.34M (4.0%)
 > \$2.18M (93%) OPCo is permitted to seek a return on incremental environmental expenses through 2011 under the 2009 Ohio ESP order. Pursuant to this provision of the ESP, cost incurred through 12/31/10 was included in an Environmental Investment Carry Cost Rider (EICCR) filing in February 2011. Recovery of these costs commenced on 7/1/11 as approved by the PUCO. Post-2011, costs will be recovered under Ohio Generation rates established by the ESP Order of December 2011.
 > \$0.16M (7%) Allocated to WPCo and recovered in current demand charge effective 1/1/10

Funding: 2012 Control Budget (included in IRC Presentation) N/A Offset Source N/A
Requested future year funds are included in the last official Forecast.

Approved By: S. Burge/C. Patton/P. Chodak/J. Hamrock/
 M. McCullough/N. Akins **Approved On:**

Capital Program Approval Requisition

Expenditure to be Authorized (fully loaded)

	Capital	Removal	Total
Previously Approved Amount	52,730,190	625,000	53,355,190
This Submission	1,495,799	(501,043)	994,756
Total	\$ 54,225,989	\$ 123,957	\$ 54,349,946

2012 Direct Cost Budget Funding

Budget Offset Source and Amount

In Budget	N/A	<i>(If budget offset, provide Opco, BU, Project ID, \$'s)</i>
Budget Offset	\$ -	

Required Signatures

Authorization Limits	Title	Approver	Signature	Date
amt ≤ \$ 10m	SVP, Business Unit	Burge, S.	See electronic approval attached	11/21/2011
amt ≤ \$ 10m	Opco President	Patton, C. Hamrock, J. Pauley, G. Chodak, P.	See electronic approval attached	12/5/11 11/28/11 12/2/11 11/28/11
amt ≥ \$ 10m	EVP - Generation	McCullough, M.		
amt ≥ \$ 20m	President & CEO	Akins, N		
CP&B Review	Senior Vice President	Dieck, L.		

Project Contacts

Contact	Name	Telephone
Project Manager	Jill Sustar / Alan Varney	200-1835 / 200-2766
Requisition Detail Provider	Steve Decker	200-3714

Capital Program Approval Requisition

Reason for Revision

The SNCR program is now complete, but requires CI Revision 3 to close the program because of the scope change within the program. The scope and strategy of the SNCR Program was modified to eliminate SNCR installations at Conesville 5 & 6 and Big Sandy 1 as well as feasibility studies for Tanners Creek 4, Kanawha River 1-2, Kammer 1-3, and Muskingum River 1-4. The funds allotted for these eliminated projects were used within the program to help mitigate accelerated in service dates, extended start-up periods and additional scope not addressed in the previous version.

Justification for Version 3

Since the SNCR Program was covered under a Program CI, the funds originally forecasted for the cancelled projects were shifted to cover cost increases for the remaining projects at Clinch River, Sporn, and Tanners Creek. The cost increases for Clinch River, Tanner's Creek and Sporn are as follows:

Clinch River 1-3

The CR Units 1-3 SNCR Project included the installation of unitized SNCR and SO₃ Injection Systems, a rail delivery and Urea Bulk Storage System, and ammonia slip monitors. Although the NSR Mandate did not require the installation until the end of 2009, AEP's strategy for meeting NOx caps required the installation by the end of 2008. Therefore, the project schedule was fast-tracked and crashed to meet the 2008 date. Subsequently, 85% of the previous CI version funding (CI V2) was spent in 2008. However, at the end of 2008 the SO₃ System demolition and installation had not been started, the Urea Bulk Storage System was only partially installed, the SNCR System included several components that were only temporarily installed, and the permanent installation and ultimate change-out of the ammonia slip monitors had yet to occur. The project was approximately 50% complete and was ultimately finished in Q1 2011. A total of approximately \$13,000,000 was required in addition to the previous revision of the CI to complete the project. These cost increases can be attributed to the following areas:

- o Material – The delta in material cost between CI V2 and this submittal is approximately \$3,000,000. The new slip monitors and air compressor account for approximately \$600,000 of the difference. Also, purchase orders for piping, valves, electrical components, and heat trace were issued to cover the SNCR permanent installation scope.
- o Labor – Removal. The majority of the project removal scope included the partial demolition of the existing SO₃ Injection System. The cost between CI V2 and this submittal is a decrease of approximately \$500,000 due to the ease of demolition and a scope that was reduced after negotiations with the plant. This delta was shifted to cover increased capital labor costs.
- o Labor – UCCI, the construction contractor, was also managing another large capital project at CR in 2008 (the CR Coal Blend Project). UCCI was not able to manage labor productivity for both projects simultaneously and exhibited generally poor performance. Therefore, AEP chose to stop UCCI's work on the project in April 2009 and rebid the remaining work to D&Z and UCCI. D&Z was the winning bidder. D&Z was utilized to complete the balance of the SNCR and Bulk Storage Systems, the demo and installation of the SO₃ System, and the slip monitor rework. D&Z charges alone equaled \$3,200,000 and were not known when CI V2 was submitted. Also, Site Support Services (Nursing, Insulation, Scaffolding) T&M contracts exceeded previous estimates due to the extended project duration, and several additional support service contracts were issued. The delta in labor costs between CI V2 and this submittal is approximately \$7,000,000.
- o PME&C – Project Management, Engineering and Construction, and the Plant, supported the project through the extended project duration and the delta in PME&C between CI V2 and this submittal is approximately \$1,100,000.
- o Outside Services - The previous CI version allocated enough funding to cover the S/U support contracts however the outside engineering contract required \$900,000 greater than the previous version.
- o AFUDC & AEP Allocations - The delta in AFUDC and AEP Allocations between CI V2 and this submittal is approximately \$2,000,000. This increase is a result of the extended project duration.
- o Contingency – The \$1,000,000 contingency was reduced to zero in this revision of the CI since the project is complete and no contingency funds are required.

Capital Program Approval Requisition

Justification for Version 3 (continued)

Sporn 3 & 4

Sporn Units 3 and 4 SNCR Project included the permanent installation of a previously installed temporary test system. A total of approximately \$1,700,000 was required in addition to the previous revision of the CI to complete the project. These cost increases can be attributed to the following areas:

- o Labor – 80% of the additional project funding can be attributed to labor. The conversion of the temporary system proved to be more labor intensive than was previously estimated.
- o AEP Allocations – The balance of the additional funding can be attributed to AEP Allocations. The allocations included in CI V2 were underestimated.

Tanner's Creek 1-3

The variance between the final costs for the SNCR at Tanners Creek installed on Units 1-3 and the CI cost was \$3,483,103. The final cost was approximately 130% of the CI amount. The explanation of the variance was that the CI amount was based on an indicative estimate from Clinch River SNCR estimate and scope. The estimate was revised upward as actual experience and understanding was gained from over time. The \$3.5M could be broken down as follows:

- o The labor contracts were bid and the three major labor contracts for civil, mechanical and electrical were managed to their contract amount, however the awarded amounts were approximately 35% higher (+\$1.7M) than estimated amounts. The higher costs could be attributed to;
 - o Difficulty in accessing the existing boilers and etc.
 - o Added redundancy of installed equipment due to consent decree,
 - o Added containment for three ammonia storage tanks,
- o The engineering and material contracts were more defined and were awarded within the estimated costs. (-\$0.7M)
- o Outside services costs were approximately as estimated.
- o Startup services were contracted out and exceeded the estimate (+\$0.6M) due to the added hours to starting up each unit individually to support the demands of the Plant operations schedule.
- o AEPSC PM&EC charges exceeded the estimated costs by 110% (+\$0.7M) due to the number of personnel involved with managing the work, tracking the cost and schedule and reporting.
- o AEP AFUDC charges were 100% higher and allocations were 1000% higher than estimated (+\$1.2M).

Project Justification CI Version 2

AEP's New Source Review (NSR) consent decree settlement requires AEP to install Selective Non-Catalytic Reduction (SNCR) at Clinch River Units 1-3 with a mandated operation date of 12/31/2009 as well as NOx caps for the Eastern Fleet starting 1/1/2009.

Clinch River Units 1-3 SNCR installation will remove approximately 2,000 tons of NOx per year. The SNCR installation and SO₃ Injection system installation requires an additional \$12.5 million for a total project direct cost of \$21.7 million. The Version 1 CI funding request was an indicative estimate based on the temporary installation at Sporn with no site-specific engineering and design completed. During the engineering and planning phase the following items, which contributed to increased cost, were identified which were not originally taken into consideration:

- o Redundancy requirements to support the NSR Consent Decree mandate – approximately \$3.5 million
- o Rail unloading facility and bulk storage tank for material handling and storage - approximately \$2 million.
- o Environmental and safety requirements such as urea containment for ground water protection, platforms, lighting, and tank venting - approximately \$1.5 million.
- o Unitized Stack Particulate Control (SO₃ Injection) system design basis compared to a single system feeding 3 units - approximately \$2.5 million.
- o Other site specific impacts such as labor availability and physical location for material deliveries - approximately \$2.3 million
- o Outside engineering services to execute the project within an expedited 9 month schedule - approximately \$ 0.7 million.

Capital Program Approval Requisition

Project Justification CI Version 2 (continued)

Sporn Units 3 and 4 SNCR conversion will remove approximately 900 tons of NO_x per year. The conversion to a permanent system requires an additional \$2.6 million for a total project direct cost of \$3.8 million. The Version 1 CI funding request was an indicative estimate without site specific engineering and design. During the engineering and planning phase the following items, which contributed to increased cost, were identified which were not originally taken into consideration:

- Requirement for piles to support the day tanks and skid equipment - \$0.5 million
- Environmental and safety requirements such as urea containment for ground water protection, platforms, lighting, and tank venting - \$0.75 million
- New skid enclosure, utility connections, and relocation of the existing skid - \$ 0.5 million
- Truck loading facility from the Mountaineer Ammonia on Demand urea system - \$ 0.5 million
- Outside engineering services to execute the project task track – \$ 0.35 million

A corporate SNCR strategy team has been assembled consisting of team members Projects, Engineering, Generation, Commercial Operations, Corporate Planning & Budgeting, Fuels, Emissions, & Logistics, and Strategic Policy Analysis. The team was chartered to provide strategic guidance on SNCR installation requirements and sequences to meet the consent decree mandated NO_x caps going forward. Future versions of this CI will request authorization for funding that involves SNCR installations based on team evaluated compliance strategy and directed by senior management.

Based on the current regulatory compliance and economic strategic analysis the following SNCR installation sequence, following Clinch River 1-3 and Sporn 3 and 4, has been determined for this CI Version 2:

- Tanners Creek 1-3 SNCR installation is required to balance some of Indiana Michigan Power NO_x needs. The installation will remove approximately 1,400 tons of NO_x per year by 8/1/2009.
- Conesville 5 & 6 SNCR installation will remove approximately 2,700 tons of NO_x per year by 5/1/2010
- Big Sandy 1 SNCR installation will remove approximately 1,000 tons of NO_x per year by 8/1/2010.

The total current estimated program direct costs have increased from \$21.8 million in Version 1 of the CI to \$53.4 million in Version 2 involving SNCR installation at Clinch River 1-3, Sporn 3 and 4, Tanners Creek 1-3, Conesville 5 and 6, and Big Sandy 1.

Project Justification CI Version 1

Two main models are used to forecast and budget for generation and subsequent emissions within the AEP's fleet: Gentrader and PROMOD. Recent results of the Gentrader simulation suggest that AEP will need to reduce NO_x below current levels to achieve compliance with the NSR consent decree mandated Eastern Fleet NO_x cap in 2009. Commercial Operations' preliminary estimate indicates that the loss in revenue associated with reducing NO_x emissions by 2,000 tons to the cap level in 2009 through modified dispatch of high NO_x emitting units is \$25-\$30 million. Moving the Clinch River 1-3 SNCR project schedule ahead by one year would roughly achieve the same 2,000-ton reduction and would cost approximately \$960,000 in carrying costs and \$2 million in annual operating costs. As such, expediting the in-service date of another SNCR system could provide an extra margin of financial surety pending satisfactory CFD modeling results. Strategic Policy & Analysis, Commercial Operations, Corporate Planning and Budgeting, and Risk Analysis are currently undertaking a study to evaluate the risk associated with the 2009 NO_x cap and other NSR consent decree caps and will provide the results as they become available to the key stakeholders and project sponsors of this Non-SCR Fleet, NO_x Compliance Program.

Currently, Sporn Units 3 and 4 operate with a temporary SNCR system. Funding to convert existing temporary installations to permanent operational SNCR systems by 12/31/2008 has been included in this request. Feasibility studies will also be performed at Tanners Creek, Big Sandy and Kanawha River to determine possible future sites for SNCR installations within the AEP system.

Capital Program Approval Requisition

Project Justification CI Version 1 (continued)

In conjunction with the SNCR installations, a reliable SO₃ injection system (flue gas conditioning) is necessary to control the potential deleterious effects of NH₃ slip on opacity. The need for an SO₃ injection system is also closely tied to the coal and its constituents including sulfur content. Considering the current and future need for fuel flexibility, funds for SO₃ injection system installations are considered essential for SNCR installations to ensure *not only* NOx reduction but also to maintain opacity within compliance.

In fiscal year 2009, commodity and O&M annual costs are estimated at \$2.5 to \$3.0 million for Clinch River Units 1-3 and \$1.0 to \$1.5 million for Sporn Units 3 and 4.

Alternatives Considered

This Program will consider SNCR and combustion tuning as potential low-capital NOx reduction technologies. Other NOx reduction technologies, such as SCR retrofits, were not considered as part of this program due to significantly higher installation costs.

Conclusion

Through a program of staged installation of SNCR and associated systems, AEP will be capable of economically meeting future NOx caps reductions. Adding the SNCR at the Clinch River plant before the NSR Consent Decree-required date of 12/31/2009 will support compliance with the 2009 NOx cap requirement.

Associated/Future Projects – N/A

REQUEST

Refer to Kentucky Power's response to Staff's First Request, Item 18.

- a. Provide a detailed description of the materials purchased in the amount of \$5,966,590 for the wet flue gas desulfurization ("WFGD") associated with the 2004-2006 Preliminary Scrubber Analysis.
- b. Explain whether this material will be used on the proposed DFGD.
- c. Provide copies of all journal entries that support the \$15,212,425 along with accompanying journal entry explanations of the charges.

RESPONSE

- a. Attachment 1 shows the invoices that support the \$5.9 M classified as materials purchased. However, these invoices were classified incorrectly. These costs were for engineering work pertaining to vendors whom we would have been purchasing material from if and when actual construction would have begun. All of these costs should have been classified to outside services.
- b. Because the costs incurred were for engineering work, there was no material to be used on the proposed DFGD.
- c. Please see attachment 2, page 4 of the journal entry. The last four entries on this page show the \$15,212,425 being transferred from account 1070001 to account 1830000. The costs are broken down between \$13,563,683.54 and \$1,648,741.38 that make up the \$15,212,425 balance. Page 5 of this attachment shows the breakdown of the dollars with cost descriptions.

WITNESS: Ranie K Wohnhas

Project Name	BIG SANDY U2 DFGD W/ FF
GL Business Unit (GLBU) (Code)	117
Project ID	000009633
Account Number (Code)	1070001
Cost Component (Code)	(All)
Invoice Number (expensed)	(All)
Journal Date	(All)
Journal Descr	(All)
Journal ID (Code)	(All)
Project Type ID #	(All)
PSoft Level 20 (Descr)	(All)
PSoft Level 30 (Descr)	(All)
PSoft Level 40 (Descr)	(All)
Purchase Order	(All)
Reporting Period	(All)
Shutdown Number	(All)
Transaction Type (Code)	(All)
Voucher ID (Code)	(All)
Work Order Number with Task Number	(All)
Work Order Status Description	(All)
Work Order Task Status Description	(All)
Work Order Nb	(All)
Work Order Desc	(All)
Department ID (Descr)	(All)

Sum of Transaction Amount (Actual)			
Cost Component (Descr)	Workorder (Code)	Vendor Name	Total
310 MMS From Stock General	X117031044	-	13,086
	X117031044 Total		13,086
310 MMS From Stock General Total			13,086
390 Direct Purchase-Other Than MMS	X117031202	BANK ONE COMMERCIAL CARD ACTIVITY	277
		MCCOY & MCCOY LABORATORIES INC	73
	X117031202 Total		349
	X117031302	ENERFAB INC	1,101
	X117031302 Total		1,101
	X117031601	TYLER MOUNTAIN WATER CO INC	(141)
	X117031601 Total		(141)
	4061536501	BANK ONE COMMERCIAL CARD ACTIVITY	116
	4061536501 Total		116
390 Direct Purchase-Other Than MMS Total			1,426
391 Material - Outside Contractor	X117031501	BLACK & VEATCH LTD	5,952,079
	X117031501 Total		5,952,079
391 Material - Outside Contractor Total			5,952,079
393 Sales & Use Tax Accrual	X117031501	-	(212,444)
		BLACK & VEATCH LTD	212,444
	X117031501 Total		-
393 Sales & Use Tax Accrual Total			-
Grand Total			5,966,590

Account Number (Code)	Cost Component (Code)	Journal Date	Journal ID (Code)	Project ID	Vendor Name	Voucher ID (Code)	Work Order Desc	Workorder (Code)	Transaction Amount (Actual)
1070001	390	10/27/2005	APACC49567	000009633	BANK ONE COMMERCIAL CARD ACTIVITY	00043107	PLT LABOR BIG SANDY 2-FGD-F &	4061536501	64.43
1070001	390	12/2/2005	APACC63930	000009633	BANK ONE COMMERCIAL CARD ACTIVITY	00043809	PLT LABOR BIG SANDY 2-FGD-F &	4061536501	51.36
1070001	310	3/22/2006	INDUS06679	000009633	BANK ONE COMMERCIAL CARD ACTIVITY	00036925	BS2 DUCT INSPECTION	X117031044	13,085.64
1070001	390	2/7/2005	APACC41648	000009633	BANK ONE COMMERCIAL CARD ACTIVITY	00039141	PLANT LABOR	X117031202	39.68
1070001	390	5/10/2005	APACC80523	000009633	BANK ONE COMMERCIAL CARD ACTIVITY	00040309	PLANT LABOR	X117031202	42.61
1070001	390	6/22/2005	APACC97897	000009633	BANK ONE COMMERCIAL CARD ACTIVITY	00041839	PLANT LABOR	X117031202	51.35
1070001	390	8/30/2005	APACC26303	000009633	BANK ONE COMMERCIAL CARD ACTIVITY	00045358	PLANT LABOR	X117031202	60.41
1070001	390	2/14/2006	APACC92339	000009633	BANK ONE COMMERCIAL CARD ACTIVITY	00038572	PLANT LABOR	X117031202	82.58
1070001	390	4/14/2005	APACC69719	000009633	MCCOY & MCCOY LABORATORIES INC	00041463	PLANT LABOR	X117031202	35.88
1070001	390	8/16/2005	APACC20607	000009633	MCCOY & MCCOY LABORATORIES INC		ENERFAB -PROVIDE SCAFFOLDING	X117031302	36.88
1070001	390	8/16/2005	INDUS20851	000009633	ENERFAB INC		ENERFAB -PROVIDE SCAFFOLDING	X117031302	1,101.21
1070001	390	8/17/2005	INDUS21263	000009633	ENERFAB INC		ENERFAB -PROVIDE SCAFFOLDING	X117031302	(1,101.21)
1070001	391	8/17/2005	APACC21052	000009633	ENERFAB INC	00041560	ENERFAB -PROVIDE SCAFFOLDING	X117031302	1,101.21
1070001	391	9/26/2005	APACC36634	000009633	BLACK & VEATCH LTD	00042480	BLK & VTCH (OEM)	X117031501	2,228,760.00
1070001	391	12/12/2005	APACC67281	000009633	BLACK & VEATCH LTD	00044021	BLK & VTCH (OEM)	X117031501	529,331.00
1070001	391	12/15/2005	APACC68746	000009633	BLACK & VEATCH LTD	00044137	BLK & VTCH (OEM)	X117031501	1,849,970.00
1070001	391	1/23/2006	APACC82922	000009633	BLACK & VEATCH LTD	00044870	BLK & VTCH (OEM)	X117031501	768,010.00
1070001	391	2/16/2006	APACC93284	000009633	BLACK & VEATCH LTD	00045441	BLK & VTCH (OEM)	X117031501	153,602.00
1070001	391	3/20/2006	APACC05426	000009633	BLACK & VEATCH LTD	00046125	BLK & VTCH (OEM)	X117031501	422,406.00
1070001	393	1/31/2006	TXOUAJASUT	000009633			BLK & VTCH (OEM)	X117031501	(160,602.86)
1070001	393	2/28/2006	TXOUAJASUT	000009633			BLK & VTCH (OEM)	X117031501	(51,840.68)
1070001	393	12/12/2005	APACC67281	000009633	BLACK & VEATCH LTD	00044021	BLK & VTCH (OEM)	X117031501	35,729.85
1070001	393	12/15/2005	APACC68746	000009633	BLACK & VEATCH LTD	00044137	BLK & VTCH (OEM)	X117031501	124,873.00
1070001	393	1/23/2006	APACC82922	000009633	BLACK & VEATCH LTD	00044870	BLK & VTCH (OEM)	X117031501	51,840.68
1070001	390	10/17/2005	APACC49479	000009633	TYLER MOUNTAIN WATER CO INC	00204254	MATERIALS	X117031601	(140.78)
									5,966,590.25

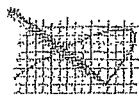
Attn: Accounts Payable - The attached invoice must be imaged/scanned

FROM AEPIMS
September 27, 2005

The following invoice was submitted electronically from AEPIMS/PMM to Accounts Payable:

Contractor: **BLACK & VEATCH**
Business Unit: 117
Accts/Payable Vendor ID: 5001352802
Invoice Number: 181626
Accts/Payable Voucher ID: 00042480
Invoice Date: 7/28/2005 00:00:00
Invoice Approval Date: 9/26/2005 11:41:13
Tot Invoice Amt: \$2,228,760.00
Withhold Retention: No

**MAIL THIS COVER LETTER ALONG WITH ALL SUPPORTING DOCUMENTS FOR THIS INVOICE
TO CANTON ACCOUNTS PAYABLE**



**Generation Application
Notification**

09/26/2005 10:08 AM

To: Russell E Starcher/CA1/AEPIN@AEPIN, Holly J
Holmes/CA1/AEPIN@AEPIN

cc:

Subject: Invoice Final Approval

Invoice 181626 has been approved by all approvers in the routing list.

Details:

-- Contract 848252 Release 0002, with \$5,608,000.00 committed and \$0.00 invoiced

Invoice 181626 for \$2,228,760.00

Vendor 5001352802: BLACK & VEATCH

Remit Vendor 0000013528: BLACK & VEATCH

Approver's Name	Emp ID	Title	Status	Date
Lascheld, William F.	S183823	Project Accountant	Courtesy Copy	
Thomas, Jeremy L.	S152224	Cost Analyst	Approved	Sep 26, 2005 08:42 am
Robinson, Leonard G.	S185581	Project Engineer	Approved	Sep 26, 2005 08:55 am
Calvert, Winter O.	S182825	Project Manager	Approved	Sep 26, 2005 09:13 am
Walton, Robert L.	S933612	Program Director	Approved	Sep 26, 2005 09:46 am
Rencheck, Michael W.	S008020	Senior V.P.	Approved	Sep 26, 2005 10:07 am

Please go to PMM to approve this invoice and, if necessary, send it to Accounts Payable.

Contract No: 046262 Type: CP, LS, UP (w/EMOs) Release #: 0002 Rev #: 1 Title: BS-2 WFGD Retrofit Project Design & Supply OEM
 Contractor: BLACK & VEATCH Release Type: Blanket release L.O.A. LRP Code: BS8346

Contract Release

Release Info Release Rates Line Items Invoice Cost Summary Performance

#	Invoice No.	Status	Tot Invoice Amt	Orig Inv Date	Inv Recd Date	Period From Date	Period End Date	Invoice Amount
1	181628	Preliminary	\$2,228,760.00	07/28/2005	07/28/2005	07/28/2005	07/28/2005	

Invoice Approval Routing

Invoice Routing List (Drag and drop rows to reorder the list)

Sort Order	Emp ID	Employee Name	Title	Role	Validate C P & B Authorization	Notify If Rejected	Notify If Late	Courtesy Copy
1	S183823	Lascheid, William F.	Project Accountant	Project Accountant	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
2	S152224	Thomas, Jeremy L.	Cost Analyst	Cost Analyst - R	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3	S185581	Robinson, Leonard G.	Project Engineer	Project Engineer - R	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4	S182825	Calvert, Writter O.	Project Manager	Project Manager - A	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5	S933612	Walton, Robert L.	Program Director	Program Director - J	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
6	S008020	Bencheck, Michael W.	Senior V.P.	Senior V.P. - A	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Invoice Routing Comments:
 This invoice was held waiting on the set up of the contract. The contractor is invoicing for 8% of the contract value of \$27,859,500.00

Route for Approval Recall OK Cancel



BLACK & VEATCH CORPORATION

~ INVOICE ~

PLEASE REMIT TO:
BLACK & VEATCH CORPORATION
P.O. BOX 803823
KANSAS CITY MO 64180-3823
FED ID:431833073

J.P. (NICK) NICKLESS
AMERICAN ELECTRIC POWER
1 RIVERSIDE PLAZA
COLUMBUS OH 43215-2373

RECEIVED BY

JUL 28 2005

AEP
COST CONTROL

CLIENT REF : 648252-0002X117
INVOICE DATE : 7/28/2005
PAYMENT DUE : DUE IMMEDIATELY
INVOICE NO : 181626
PROJECT NAME : BIG SANDY OEM
PROJECT NO : 141643
B&V CONTACT : SOLAR, JOHN R
TELEPHONE : 913/456-7770

DESCRIPTION	AMOUNT
AWARD PAYMENT 8% OF 27,859,500	2,228,760.00
TOTAL DUE (USD)	2,228,760.00

WIRE TRANSFER INFORMATION :
BLACK & VEATCH CORPORATION
ACCOUNT NUMBER : 5338422
COMMERCE BANK, N.A. KC, MO, USA
ABA NUMBER : 101000019
TELEX NO. 6716509, S.W.I.F.T. NO. CBKICUS44
****PLEASE INCLUDE INVOICE NUMBER****

Russell E Starcher
07/29/2005 03:05 PM

To: Jeremy L Thomas/AEPIN@AEPIN, W Fred Lascheld/AEPIN@AEPIN
CC:
Subject: Black & veatch BS FGD Contract 848252-0002 Line Set up

Jeremy and Fred can you complete the attached contract line request form for the Big Sandy Black & Veatch contract 848252-0002? We currently have an Invoice for \$2,228,760.00 and the contract is not set up in PMM. Also the Big Sandy project is using a WBS system so that needs to be considered.

Attached is a new form designed to be completed for the set up of contract lines. We are working to have this form included in all new contracts. Until this happens we will be using the following amended process.

1. Contract needs set up in PMM.

Action

- o **Cost Coordinator / Cost Tech**
 - o Completes the following:
 - o Project
 - o Contractor
 - o Contract Number
 - o Contract Description
 - o Send the attached contract line request form to the Cost Analyst for completion.
- o **Cost Analyst**
 - o Complete the following:
 - o Bid Line
 - o Description Of Bid Item
 - o Bid basis
 - o Unit of Measure
 - o Estimated Units or Hours
 - o Unit or Hourly Rate
 - o Product Code / WBS
 - o Work Order
 - o Cost Analyst will forward the form to the Project Accountant
 - o **Project Accountant**
 - o Complete the following:
 - o Cost Component
 - o Cost Analyst will return the completed form to the Cost Coordinator / Cost Tech
- o **Cost Coordinator / Cost Tech**
 - o Reviews the form for content.
 - o Forward the form to Contract Administration (Tom Cameron) to be entered in PMM.
- o **Contract Administration**
 - o Informs Cost Coordinator / Cost Tech when the contract is set up.



Contract Line Request Form Black Veatch 848250000
Russell E. Starcher
Cost Coordinator
740-925-3291
Audinet 277-3291
Fax 740-925-3296
Audinet Fax 277-3296
Cell phone 740-339-7290
Have a Great Day

Aftn: Accounts Payable - The attached invoice must be imaged/scanned

FROM AEPIMS

December 13, 2005

The following invoice was submitted electronically from AEPIMS/PMIM to Accounts Payable:

Contractor: BLACK & VEATCH

Business Unit: 117

Accts/Payable Vendor ID: 5001352802

Invoice Number: 187422

Accts/Payable Voucher ID: 00044021

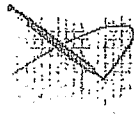
Invoice Date: 10/31/2005 00:00:00

Invoice Approval Date: 12/12/2005 06:58:38

Tot Invoice Amt: \$529,331.00

Withhold Retention: No

**MAIL THIS COVER LETTER ALONG WITH ALL SUPPORTING DOCUMENTS FOR THIS INVOICE
TO CANTON ACCOUNTS PAYABLE**



Generation Application
Notification /AEPIN
12/09/2005 03:55 PM

To Russell E Starcher/CA1/AEPIN@AEPIN, Holly J
Holmes/CA1/AEPIN@AEPIN
cc
bcc

Subject Invoice Final Approval

Invoice 187422 has been approved by all approvers in the routing list.

Details:

-- Contract 848252 Release 0002, with \$3,801,699.59 committed and \$2,228,760.00 invoiced
Invoice 187422 for \$529,331.00
Vendor 5001352802: BLACK & VEATCH
Remit Vendor 0000013528: BLACK & VEATCH

Approver's Name	Emp ID	Title	Status	Date
Lascheid, William F.	S183823	Project Accountant	Courtesy Copy	
Thomas, Jeremy L.	S152224	Cost Analyst	Approved	Dec 06, 2005 10:19 am
Robinson, Leonard G.	S185581	Project Engineer	Approved	Dec 06, 2005 11:50 am
Vanderniet, Clark L.	S007518	Project Manager	Approved	Dec 09, 2005 12:16 pm
Walton, Robert L.	S933612	Program Director	Approved	Dec 09, 2005 15:50 pm

Please go to PMM to approve this invoice and, if necessary, send it to Accounts Payable.



BLACK & VEATCH CORPORATION

~ INVOICE ~

PLEASE REMIT TO:
BLACK & VEATCH CORPORATION
P.O. BOX 803823
KANSAS CITY MO 64180-3823
FED ID : 431833073

CLIENT REF : 848252-0002X117

INVOICE DATE : 31-OCT-2005

PAYMENT DUE : 30-NOV-2005

INVOICE NO : 187422
PROJECT NAME : BIG SANDY OEM
PROJECT NO : 141643
B&V CONTACT : SOLAR, JOHN R
TELEPHONE : 913/458-7770

RECEIVED BY

NOV 09 2005

AEP

COST CONTROL

J.P. (NICK) NICKLESS
AMERICAN ELECTRIC POWER
COST CONTROL CENTER
1557 GRAVEL HILL ROAD
CHESIRE, OH 45820

DESCRIPTION	AMOUNT
ISSUE FLOW MODEL PO	473,612.00
TOTAL DUE (USD)	529,331.00

WIRE TRANSFER INFORMATION :
BLACK & VEATCH CORPORATION
ACCOUNT NUMBER : 5336422
COMMERCIAL BANK, N.A. KC, MO, USA
ABA NUMBER : 101000019
TELEX NO. 6715609, S.W.I.F.T. NO. CBK0US44
*****PLEASE INCLUDE INVOICE NUMBER*****

**AEP Tier II FGD Projects
 Big Sandy Unit 2**

Milestone Payment Breakdown

<u>Item Description</u>	<u>% of Contract Value</u>	<u>Date</u>
Down Payment	8.0%	Jul-05
Submit documents for DRB	0.5%	Oct-05
Receive Chiyoda Basic Engineering Package (BEP)	1.5%	Oct-05
Initial issue of general arrangement drawings	0.7%	Nov-05
Issue JBR Shell Purchase Order	1.8%	Nov-05
Revise DBR documents	0.2%	Jan-06
Issue Ball Mill Purchase Order	1.7%	Jan-06
Issue Gas Cooler Purchase Order	1.5%	Jan-06
Issue JBR FRP Internals Purchase Order	2.3%	Jan-06
Issue Vacuum Filter Purchase Order	1.6%	Jan-06
Issue Oxidation Air Blower Purchase Order	0.6%	Jan-06
Issue P&IDs for routing	0.7%	Feb-06
Initial issue of control logic diagrams	0.3%	Feb-06
Initial issue of JBR ductwork drawings	0.3%	Feb-06
Issue Mist Eliminator Purchase Order	0.4%	Feb-06
Issue Agitator Purchase Order	0.4%	Feb-06
Issue Ductwork Material Purchase Order	0.6%	Feb-06
Issue Slurry and General Service Pump Purchase Order	1.1%	Mar-06
Initial issue of JBR external piping drawings	0.3%	Apr-06
Initial issue of limestone preparation piping drawings	0.3%	Apr-06
Initial issue of gypsum dewatering piping drawings	0.3%	Apr-06
Issue flow model PO	0.2%	Jun-06
Submit final flow model report	0.6%	Jan-07
Issue training program manuals	0.5%	Jul-07
Release Ball Mills for fabrication	3.0%	Dec-07
Release JBR Shell for fabrication	4.5%	Dec-07
Release Vacuum Filter for fabrication	3.1%	Mar-08
Release JBR FRP Internals for fabrication	5.9%	Mar-08
Release Gas Cooler for fabrication	2.4%	Apr-08
B&V Site Mobilization	1.0%	Jul-08
Site delivery of JBR Shell and Roof materials	6.0%	Aug-08
JBR Shell/Roof Erection Subcontractor Mobilization	1.1%	Aug-08
Site delivery of JBR FRP Internals	5.0%	Dec-08
JBR Sideshell erection complete	2.1%	Dec-08
JBR FRP Internals Erection Subcontractor Mobilization	2.9%	Dec-08
Site delivery of Gas Cooler	2.0%	Jan-09
Site delivery of Ductwork Material	1.0%	Jan-09
Site delivery of Ball Mills	4.0%	Feb-09
Site delivery of Vacuum Filters	4.0%	Feb-09
Site delivery of Mist Eliminators	1.0%	Feb-09
Site delivery of Oxidation Air Blowers	2.0%	Mar-09
Site delivery of Slurry and General Service Pumps	2.0%	Mar-09
JBR Upper and Lower Deck installation complete	4.9%	Mar-09

Gas Cooler erection complete	1.4%	May-09
JBR Outlet Ductwork erection complete	1.8%	Jun-09
Site delivery of Agitators	1.0%	Jun-09
JBR Internal Piping and Nozzles installation complete	2.9%	Jun-09
Mist Eliminator erection complete	0.6%	Jun-09
JBR Roof erection complete	1.0%	Jul-09
Mechanical completion	1.0%	Sep-09
Substantial completion	5.0%	Feb-10
Successful completion of Acceptance Test	1.0%	Apr-10
	100.0%	



CT-121 OEM FGD Projects

B&V Project 141547
B&V File 141547.01A
October 28, 2005

78.02.05

FlowTack LLC.
1003 Morrisville Parkway, Suite 190
Morrisville, NC 27560
Telephone: 919-468-0113
Facsimile: 919-468-0153
Email: sbible@flowtack.com

Subject: Service Contract
Flue Gas Ductwork Flow Modeling

Attention: Mr. Stewart Bible

Gentlemen:

This letter shall serve as official notice of award to FlowTack Service Contractor for the CT-121 OEM FGD Projects, Flue Gas Ductwork Flow Modeling. Service Contractor is hereby authorized to proceed immediately with activities necessary to perform under the attached Service Contract. Please note that the attached Service Contract is a release for 5 different Projects, all with different Service Contract Numbers.

Two (2) signed originals of the Purchase Order / Contract signature page are included. Please sign both and return one original signature pages to the following address within five (5) business days of receiving this transmittal.

Black & Veatch Corporation
Cardinal Project - 141547
Attention: Mr. Rick Solar, Project Manager
11401 Lamar Avenue
Overland Park, KS 66211

If you have any questions, please call me at (913) 458-7770.

Very truly yours,

BLACK & VEATCH

Rick Solar
Rick Solar
Project Manager

cab
Enclosure

Page 2

FlowTack LLC.
Mr. Stewart Bible

B&V Project 141547
October 28, 2005

cc: R. Solar / File
G. Bergt
E. Sprinkle
E.L. DeForest
C. Bebow
A. Mahabaleshwarkar
K. Saxton
N. Winkle

Billing Control Form

Contractor: **Block & Veitch Corporation**
 Contract Reference: **5482a/2002X117**
 Project: **Big Sandy - O&M**

AT&T ENERGY SERVICES
POWER

Date: **11/2/2005** Invoice # **187422**

Bill Item / Milestone	Description	Current Value	Revised / Change Orders	Revised Contract Value	Quantity / Percent This Period	To Date This Period	Previous Total	Committed to Date	Cost Component	Work Orders / Task
1	Down Payment	\$ 2,228,760		\$ 2,228,760	0%		\$ 2,228,760	\$ -	391	9.N X117031501
2	Submit documents for DRB	\$ 139,288		\$ 139,288	0%		\$ -	\$ -	391	9.N X117031501
3	Revised Chrycia Basic Engineering Package (BEP)	\$ 417,693		\$ 417,693	0%		\$ -	\$ -	391	9.N X117031501
4	Initial issue of general arrangement drawings	\$ 195,017		\$ 195,017	0%		\$ -	\$ -	391	9.N X117031501
5	Issue JBR Shell Purchase Order	\$ 501,471		\$ 501,471	0%		\$ -	\$ -	391	2.E.0 X117031501
6	Review O&M documents	\$ 65,719		\$ 65,719	0%		\$ -	\$ -	391	9.N X117031501
7	Issue Ball Mill Purchase Order	\$ 473,612		\$ 473,612	100%	473,612	\$ -	\$ 473,612	391	2.E.0 X117031501
8	Issue Gas Cooler Purchase Order	\$ 417,693		\$ 417,693	0%		\$ -	\$ -	391	2.E.0 X117031501
9	Issue JBR FFP Inertial Purchase Order	\$ 640,769		\$ 640,769	0%		\$ -	\$ -	391	2.E.0 X117031501
10	Issue Vacuum Filter Purchase Order	\$ 445,752		\$ 445,752	0%		\$ -	\$ -	391	4.G.2 X117031501
11	Issue Oxidation Air Blower Purchase Order	\$ 167,157		\$ 167,157	0%		\$ -	\$ -	391	2.E.0 X117031501
12	Issue P&IDs for mulling	\$ 195,017		\$ 195,017	0%		\$ -	\$ -	391	9.N X117031501
13	Initial issue of control block diagrams	\$ 69,579		\$ 69,579	0%		\$ -	\$ -	391	2.E.0 X117031501
14	Initial issue of JBR ductwork drawings	\$ 69,579		\$ 69,579	0%		\$ -	\$ -	391	2.E.0 X117031501
15	Issue Mist Eliminator Purchase Order	\$ 111,438		\$ 111,438	0%		\$ -	\$ -	391	2.E.0 X117031501
16	Issue Agitator Purchase Order	\$ 111,438		\$ 111,438	0%		\$ -	\$ -	391	2.E.0 X117031501
17	Issue Ductwork Material Purchase Order	\$ 167,157		\$ 167,157	0%		\$ -	\$ -	391	2.E.0 X117031501
18	Issue Shunt and General Service Pump Purchase Order	\$ 306,455		\$ 306,455	0%		\$ -	\$ -	391	2.E.0 X117031501
19	Initial issue of JBR external piping drawings	\$ 83,579		\$ 83,579	0%		\$ -	\$ -	391	2.E.0 X117031501
20	Initial issue of JBR external piping drawings	\$ 83,579		\$ 83,579	0%		\$ -	\$ -	391	2.E.0 X117031501
21	Initial issue of gypsum dewatering piping drawings	\$ 69,579		\$ 69,579	0%		\$ -	\$ -	391	4.G.2 X117031501
22	Issue flow model P&O	\$ 55,719		\$ 55,719	100%	55,719	\$ -	\$ 55,719	391	2.E.0 X117031501
23	Submit final flow model report	\$ 167,157		\$ 167,157	0%		\$ -	\$ -	391	2.E.0 X117031501
24	Issue training program manuals	\$ 139,288		\$ 139,288	0%		\$ -	\$ -	391	9.N X117031501
25	Release Ball Mills for fabrication	\$ 635,705		\$ 635,705	0%		\$ -	\$ -	391	2.E.0 X117031501
26	Release JBR Shell for fabrication	\$ 1,253,678		\$ 1,253,678	0%		\$ -	\$ -	391	2.E.0 X117031501
27	Release Vacuum Filter for fabrication	\$ 863,645		\$ 863,645	0%		\$ -	\$ -	391	4.G.2 X117031501
28	Release JBR FFP Inertials for fabrication	\$ 1,649,711		\$ 1,649,711	0%		\$ -	\$ -	391	2.E.0 X117031501
29	Release Gas Cooler for fabrication	\$ 698,828		\$ 698,828	0%		\$ -	\$ -	391	2.E.0 X117031501
30	B&V SIA Modification	\$ 278,995		\$ 278,995	0%		\$ -	\$ -	210	2.E.0 X117031501

Billing Control Form

Contractor: Black & Veatch Corporation
 Contract Reference: 644262002X117
 Project: Big Sandy - O&M



Invoice # 187422

Date: 11/2/2006

Item #	Item Description	Quantity / Percent This Period	Revised Contract Value	Revisions / Change Orders	Contract Value	Previous Total	Completed to Date	Cost Component	Work Order Task
31.0	Site delivery of JBR Shell and Feed materials	0%	\$ 1,671,570		\$ 1,671,570	\$ -	\$ -	391	2.E.O. X117031501
32.0	JBR Shell/Roof Erection Subcontractor Mobilization	0%	\$ 308,455		\$ 308,455	\$ -	\$ -	210	2.E.O. X117031501
33.0	Site delivery of JBR FRP internals	0%	\$ 1,392,975		\$ 1,392,975	\$ -	\$ -	391	2.E.O. X117031501
34.0	JBR Side/Reel erection complete	0%	\$ 595,050		\$ 595,050	\$ -	\$ -	210	2.E.O. X117031701
35.0	JBR FRP internals Erection Subcontractor Mobilization	0%	\$ 807,928		\$ 807,928	\$ -	\$ -	210	0.A.2 X117031701
36.0	Site delivery of Gas Cooler	0%	\$ 597,180		\$ 597,180	\$ -	\$ -	391	2.E.O. X117031501
37.0	Site delivery of Ductwork Material	0%	\$ 278,595		\$ 278,595	\$ -	\$ -	391	2.E.O. X117031501
38.0	Site delivery of Bag Mills	0%	\$ 1,114,350		\$ 1,114,350	\$ -	\$ -	391	2.E.O. X117031501
39.0	Site delivery of Vacuum Filters	0%	\$ 1,114,350		\$ 1,114,350	\$ -	\$ -	391	2.E.O. X117031501
40.0	Site delivery of Wet Eliminators	0%	\$ 278,595		\$ 278,595	\$ -	\$ -	391	2.E.O. X117031501
41.0	Site delivery of Oxidation Air Blowers	0%	\$ 557,190		\$ 557,190	\$ -	\$ -	391	2.E.O. X117031501
42.0	Site delivery of Slurry and General Service Pumps	0%	\$ 557,190		\$ 557,190	\$ -	\$ -	391	2.E.O. X117031501
43.0	JBR Upper and Lower Deck Installation complete	0%	\$ 1,395,116		\$ 1,395,116	\$ -	\$ -	210	2.E.O. X117031701
44.0	Gas Cooler erection complete	0%	\$ 390,033		\$ 390,033	\$ -	\$ -	210	2.E.O. X117031701
45.0	JBR Outlet Ductwork erection complete	0%	\$ 501,471		\$ 501,471	\$ -	\$ -	210	2.E.O. X117031701
46.0	Site delivery of Agitators	0%	\$ 278,595		\$ 278,595	\$ -	\$ -	391	2.E.O. X117031501
47.0	JBR Internal Piping and Nozzles Installation complete	0%	\$ 807,928		\$ 807,928	\$ -	\$ -	210	2.E.O. X117031701
48.0	Reel Eliminator erection complete	0%	\$ 167,157		\$ 167,157	\$ -	\$ -	210	2.E.O. X117031701
49.0	JBR Roof erection complete	0%	\$ 278,595		\$ 278,595	\$ -	\$ -	210	2.E.O. X117031701
50.0	Mechanical completion	0%	\$ 278,595		\$ 278,595	\$ -	\$ -	210	2.E.O. X117031701
51.0	Substantial completion	0%	\$ 1,392,975		\$ 1,392,975	\$ -	\$ -	210	2.E.O. X117031701
52.0	Successful completion of Acceptance Test	0%	\$ 278,595		\$ 278,595	\$ -	\$ -	210	2.E.O. X117031701
			\$ 27,429,200	\$ -	\$ 27,429,200	\$ 2,222,750	\$ 2,179,951		

Total Contract Value	\$ 27,429,200
Invoiced to Date	\$ 2,180,000
Contract Balance	\$ 25,249,200

I certify that the quantities reported are accurate and complete to the best of my knowledge.

Approved for Payment

AEP Representative

PARTIAL WAIVER OF LIEN

State of Kansas
County of Johnson

Black & Veatch Corporation, being duly sworn, states that:

The undersigned is a duly authorized officer of Black & Veatch Corporation (the "Contractor"). In consideration of \$ 529,331.00, Contractor waives any liens and right to a lien under the laws of Kentucky for all labor performed on and materials furnished up to and including October 31, 2005 in connection with Big Sandy Plant, Unit 2 WFGD, entered into on July 22, 2005 between Kentucky Power Company (the "Owner") and Black & Veatch Corporation (the "Contractor") involving work on Owner's property located at Owner's Big Sandy Plant near Louisa, Kentucky.

Contractor acknowledges that it has secured similar lien waivers from its subcontractors, suppliers, laborers, or material men.

This Partial Waiver of Lien is conditioned upon receipt of the scheduled payment of \$529,331.00 set forth above. This Partial Waiver of Lien does not include future scheduled payments for work yet to be performed and payments yet to be received under the Contract.

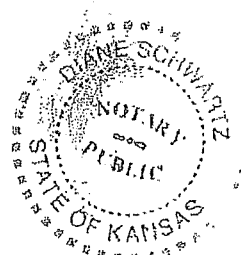
Dated : 12-5-05

Black & Veatch Corporation

By : Rick Solar
Rick Solar
Associate Vice President

Sworn before me and subscribed in my presence this 5th day of December, 2005:

Diane Schwartz
Notary



Contract No: 010252 Type: CP, LS, UR (w/BAOs) Release #: 10002 Rev #: 3 Title: BS-2 WFGD Retrofit Project Design & Supply OEM
 Contractor: BEACON BEACH & VEATCH Release type: Blanket release LRP Code: BS8348
 Contract: Release

Release Info | Release Rates | Line Items | Invoice | Cost Summary | Performance

#	Invoice No.	Status	Tot Invoiced Amt	Orig Inv Date	Inv Recd Date	Period From Date	Period End Date
1	187422	Preliminary	\$529,331.00	10/31/2005	11/09/2005	10/31/2005	10/31/2005

Invoice: Amount: Date:

Invoice Approval Routing

Invoice Routing List: Drag and drop rows to reorder the list

Sort Order	Emp ID	Employee Name	Title	Role	Validate C P & B Authorization	Notify If Rejected	Notify If Late	Courtesy Copy
1	S183623	Lascheid, William F.	Project Accountant	Project Accountant	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2	S152224	Thomas, Jeremy L.	Cost Analyst	Cost Analyst - R	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3	S185581	Robinson, Leonard G.	Project Engineer	Project Engineer - R	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4	S007516	Vandermet, Clark L.	Project Manager	Project Manager - A	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5	S93612	Walton, Robert L.	Program Director	Program Director - R	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Invoice Routing Comments:
 Mile stone payment for Issue Ball Mill PO and Issue flow model PO

Route for Approval: Recall OK Cancel



BLACK & VEATCH CORPORATION

~ INVOICE ~

PLEASE REMIT TO:
 BLACK & VEATCH CORPORATION
 P.O. BOX 803823
 KANSAS CITY MO 64180-3823
 FED ID : 431833073

OR ELECTRONIC WIRE TRANSFER TO:
 BLACK & VEATCH CORPORATION
 ACCOUNT NUMBER: 5336422
 COMMERCE BANK, N.A., KC, MO. USA
 ABA NUMBER: 101000019
 TELEX NO. 6715509, S.W.I.F.T. NO. CBKUS44
 ***PLEASE INCLUDE INVOICE NUMBER

J.P. (NICK) NICKLESS
 AMERICAN ELECTRIC POWER
 COST CONTROL CENTER
 1557 GRAVEL HILL ROAD
 CHESHIRE, OH 45620

CLIENT REF : 848252-0002X117
 INVOICE DATE : 09-DEC-2005
 PAYMENT DUE : 30-DEC-2005
 INVOICE NO : 189979
 PROJECT NAME : BIG SANDY OEM
 PROJECT NO : 141643
 B&V CONTACT : SOLAR, JOHN R
 TELEPHONE : 913/456-7770

DESCRIPTION	CONTRACT COMMITTED VALUE	PREVIOUSLY INVOICED	AMOUNT OF MILESTONE
DOWN PAYMENT	3,072,040.00	2,228,760.00	843,280.00
RECEIVE CHIYODA BASIC ENGINEERING PACKAGE (BEP)	576,008.00	0.00	576,008.00
ISSUE BALL MILL PURCHASE ORDER	662,809.00	473,612.00	179,197.00
ISSUE P&IDs FOR ROUTING	230,403.00	0.00	230,403.00
ISSUE FLOW MODEL PO	76,801.00	55,719.00	21,082.00
TOTAL DUE (USD)			1,849,970.00

TOTAL BILLED TO DATE 4,608,060.00

WIRE TRANSFER INFORMATION:
 BLACK & VEATCH CORPORATION
 ACCOUNT NUMBER: 5336422
 COMMERCE BANK, N.A. KC, MO. USA
 ABA NUMBER: 101000019
 TELEX NO. 6715509, S.W.I.F.T. NO. CBKUS44
 ***PLEASE INCLUDE INVOICE NUMBER

Handwritten notes:
 12/22/05
 CONFIDENTIAL

PARTIAL WAIVER OF LIEN

State of Kansas
County of Johnson

Black & Veatch Corporation, being duly sworn, states that:

The undersigned is a duly authorized officer of Black & Veatch Corporation (the "Contractor"). In consideration of \$ 1,849,970.00, Contractor waives any liens and right to a lien under the laws of Kentucky for all labor performed on and materials furnished up to and including December 2, 2005 in connection with Big Sandy Plant, Unit 2 WFGD, entered into on July 22, 2005 between Kentucky Power Company (the "Owner") and Black & Veatch Corporation (the "Contractor") involving work on Owner's property located at Owner's Big Sandy Plant near Louisa, Kentucky.

Contractor acknowledges that it has secured similar lien waivers from its subcontractors, suppliers, laborers, or material men.

This Partial Waiver of Lien is conditioned upon receipt of the scheduled payment of \$ 1,849,970.00 set forth above. This Partial Waiver of Lien does not include future scheduled payments for work yet to be performed and payments yet to be received under the Contract.

Dated : 12-9-05

Black & Veatch Corporation

By : Rick Solar
Rick Solar
Associate Vice President

Sworn before me and subscribed in my presence this 9 day of December 2005:

Melissa A. Dean
Notary





CT-121 OEM FGD Projects

B&V Project 141547
B&V File 62.0403.01A
November 23, 2005

Atlas Copco Compressors Inc.
94 North Elm Street
Floor 4
Westfield, MA 01085
Telephone: 303-986-2244
Facsimile: 303-986-2227
Email: chad.holmes@us.atlascopco.com

Subject: Purchase Order Letter of Award
Oxidation Air Blowers

Attention: Chad Holmes

Pending issuance of a formal Purchase Order, Black & Veatch Corporation (Purchaser) is pleased to issue this Letter of Award indicating our award to Atlas Copco Compressors Inc. (Supplier) covering the furnishing of Oxidation Air Blowers for the following Projects: Cardinal Units 1 & 2, Muskingum River Unit 5, Kyger Creek Units 1 thru 5, Conesville Unit 4 and Big Sandy Unit 2.

This Letter of Award is based on the requirements for Purchaser's Request for Quotation dated September 02, 2005 (141448.62.0403), except as specifically stated below and attached.

- Section 00400 includes Price Breakdown, Option and/or Unit Adjustment Pricing (if applicable), Delivery Dates, and Schedule of Submittals.
- RFQ Commercial and Technical documents modified to reflect agreements reached during the negotiation and conditioning process of this Purchase Order.

In addition, this Letter of Award releases Supplier to proceed with the Work to the extent listed below, and upon Supplier's unqualified acceptance of this Letter of Award, is a binding commitment on the part of the Purchaser and Supplier.

- Supplier is released to proceed with all activities associated with the Work associated required to maintain the agreed upon schedule, see below. The following are the associated Purchase Order Numbers and Price for each site. Refer to Section 00400 for further price breakdown.

Full Release for All Activities

Cardinal Units 1 & 2 -- PO# 141547.62.0403, Firm Lump Sum Price of US\$2,203,430.00
Muskingum River Unit 5 -- PO# 141641.62.0403, Firm Lump Sum Price of US\$1,293,820.00
Kyger Creek Units 1 thru 5 -- PO# 141642.62.0403, Firm Lump Sum Price of US\$1,927,490.00
Conesville Unit 4 -- PO# 141644.62.0403, Firm Lump Sum Price of US\$1,358,620.00
Big Sandy Unit 2 -- PO# 141643.62.0403, Firm Lump Sum Price of US\$1,304,565.00

Page 2

Atlas Copco Compressors Inc.
Mr. Chad Holmes

B&V Project 141547
November 23, 2005

The formal conformed Purchase Orders are currently under preparation and are scheduled for issuance shortly. Supplier agrees to execute such Purchase Orders and return to Purchaser within five working days of receipt, or, to notify Purchaser within said time frame that the Supplier deems that the conformed Purchase Order does not agree with this Letter of Award.

Please acknowledge acceptance of the above by your signature in the blocks designated below, and return the signed original document to Mr. Rick Solar at 11401 Lamar Avenue, Overland Park, Kansas, 66211.

If you have any questions, please call me at (913) 458-7770.

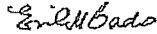
Very truly yours,

BLACK & VEATCH



Rick Solar
Project Manager

ACKNOWLEDGEMENT



[Signature]

EMILE BADO

[Printed Name]

VICE PRESIDENT, DILFREEAIR BUSINESS LINE

[Title]

NOVEMBER 28, 2005

Date

cab
Enclosures



CT-121 OEM FGD Projects

B&V Project 141547
B&V File 141547.01A
October 28, 2005

78.0205

FlowTack LLC.
1003 Morrisville Parkway, Suite 190
Morrisville, NC 27560
Telephone: 919-468-0113
Facsimile: 919-468-0153
Email: sbible@flowtack.com

Subject: Service Contract
Flue Gas Ductwork Flow Modeling

Attention: Mr. Stewart Bible

Gentlemen:

This letter shall serve as official notice of award to FlowTack Service Contractor for the CT-121 OEM FGD Projects, Flue Gas Ductwork Flow Modeling. Service Contractor is hereby authorized to proceed immediately with activities necessary to perform under the attached Service Contract. Please note that the attached Service Contract is a release for 5 different Projects, all with different Service Contract Numbers.

Two (2) signed originals of the Purchase Order / Contract signature page are included. Please sign both and return one original signature pages to the following address within five (5) business days of receiving this transmittal.

Black & Veatch Corporation
Cardinal Project - 141547
Attention: Mr. Rick Solar, Project Manager
11401 Lamar Avenue
Overland Park, KS 66211

If you have any questions, please call me at (913) 458-7770.

Very truly yours,

BLACK & VEATCH

Rick Solar
Project Manager

cab
Enclosure

Page 2

FlowTack LLC.
Mr. Stewart Bible

B&V Project 141547
October 28, 2005

cc: R. Solar / File
G. Bergt
E. Sprinkle
E.L. DeForest
C. Bebow
A. Mahabaleshwarkar
K. Saxton
N. Winke

CT-121 OEM Projects
 141547.78.0205

Flue Gas Ductwork Flow Modeling

Contract Issue
 28Oct05

opportunity; loss of goodwill; cost of substitute facilities, goods or services; cost of capital; cost of replacement power; governmental and regulatory sanctions; and claims of customers for such damages; or for any special, consequential, incidental, indirect or exemplary damages.

00471.5.7 Binding Effect

This Agreement will be binding upon and will inure to the benefit of the parties and their respective heirs, legatees, personal representatives and other legal representatives, successors and permitted assigns. Except as otherwise specifically provided, this Agreement is not intended and will not be construed to confer upon or to give any person other than the parties any rights or remedies.

00471.5.8 Waiver

To the fullest extent allowed by law, releases from, waivers of, and limitations of liability shall apply notwithstanding the breach of contract, tort, including negligence, strict liability, or other theory of legal liability of the Party released or whose liability is limited.

00471.5.9 Professional Liability Insurance

As this Service Contract requires professional services by Service Contractor, evidence of professional liability insurance is required. The policy limits shall be in at least the amount of \$1,000,000 for each occurrence and \$1,000,000 in the aggregate. Such policy shall include contractual liability coverage, and such coverage shall remain in effect for at least two years after final payment (and Service Contractor shall furnish Purchaser certificates of insurance evidencing continuation of such insurance at final payment and one year thereafter.

IN WITNESS WHEREOF, Purchaser and Service Contractor have signed this Service Contract in duplicate.

	<u>FlowTack LLC.</u>		<u>Black & Veatch Corporation</u>
	(Service Contractor)		(Purchaser)
By	<u>Stewart Bible</u>	By	<u>Rick Solar</u>
	(Printed Name)		(Printed Name)
By	<u><i>Stewart Bible</i></u>	By	<u><i>Rick Solar</i></u>
	(Signature)		(Signature)
	<u>General Manager</u>		<u>Project Manager</u>
	(Title)		(Title)
	<u>10-31-05</u>		<u>10-28-05</u>
	(Date)		(Date)
	<u>41-2112949</u>		
	Service Contractor Federal Tax ID Number		

141547.78.0205.01A
 File
 A. Mahabaleswara
 C. Brown
 G. Berg
 E. Sprinkle

BASIC ENGINEERING PACKAGE
OF
THE CT-121 FGD PROCESS
FOR
AEP BIG SANDY PLANT UNIT 2
TO
BLACK & VEATCH CORPORATION



NOVEMBER 2005





ENERGY WATER INFORMATION GOVERNMENT

CT-121 OEM Projects

B&V Project 141547
B&V File 62.1802.01A
October 28, 2005

FFE Minerals USA Inc.
3235 Schoenersville Road
Bethlehem, PA 18017-2103
Telephone: 610-264-6468
Facsimile: 610-264-6802
Email: Anthony.fildore@ffeminerals.com

Subject: Purchase Order Letter of Award
FGD Reagent Preparation System

Attention: Mr. Anthony Fildore

Pending issuance of a formal Purchase Order, Black & Veatch Corporation (Purchaser) is pleased to issue this Letter of Award indicating our award to FFE Minerals USA Inc. (Supplier) covering the furnishing of FGD Reagent Preparation System Equipment for the following Projects: Cardinal Units 1 & 2, Muskingum River Unit 5, Kyger Creek Units 1 thru 5, Conesville Unit 4 and Big Sandy Unit 2.

This Letter of Award is based on the requirements for Purchaser's Request for Quotation dated 7/22/05 (141448.62.1802), except as specifically stated below and attached.

- Section 00400 includes Price Breakdown, Option and/or Unit Adjustment Pricing (if applicable), Delivery Dates, and Schedule of Submittals.
- RFQ Commercial and Technical documents modified to reflect agreements reached during the negotiation and conditioning process of this Purchase Order.

In addition, this Letter of Award releases Supplier to proceed with the Work to the extent listed below, and upon Supplier's unqualified acceptance of this Letter of Award, is a binding commitment on the part of the Purchaser and Supplier.

- Supplier is released to proceed with all activities associated with the Work or only engineering activities associated required to maintain the agreed upon schedule, see below. The following are the associated Purchase Order Numbers and Price for each site. Refer to Section 00400 for further price breakdown.

Full Release for All Activities

Cardinal Units 1 & 2 – PO# 141547.62.1802, Lump Sum Price of US [REDACTED]
Muskingum River Unit 5 – PO# 141641.62.1802, Lump Sum Price of US [REDACTED]
Kyger Creek Units 1 thru 5 – PO# 141642.62.1802, Firm Lump Sum Price of US [REDACTED]

Release for Engineering Only

Conesville Unit 4 – PO# 141644.62.1802, Firm Lump Sum Price of US [REDACTED] (Engineering Only) which is 10% of the Total Lump Sum cost for Conesville indicated in Section 00400.1, Price Breakdown. The balance of the Work Lump Sum Price is US [REDACTED] which is subject to mutually agreed upon adjustments to become a Firm Lump Sum Price prior to Release for Manufacturing.

Page 2

FFE Minerals USA Inc.
Mr.

B&V Project 141448
October 28, 2005

Big Sandy Unit 2 – PO# 141643.62.1802, Firm Lump Sum Price of US\$ [REDACTED] (Engineering Only) which is 10% of the Total Lump Sum cost for Conesville indicated in Section 00400.1, Price Breakdown. The balance of the Work Lump Sum Price is US\$ [REDACTED] which is subject to mutually agreed upon adjustments to become a Firm Lump Sum Price prior to Release for Manufacturing.

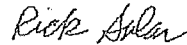
The formal conformed Purchase Orders are currently under preparation and are scheduled for issuance shortly. Supplier agrees to execute such Purchase Orders and return to Purchaser within five working days of receipt, or, to notify Purchaser within said time frame that the Supplier deems that the conformed Purchase Order does not agree with this Letter of Award.

Please acknowledge acceptance of the above by your signature in the blocks designated below, and return the signed original document to Mr. Rick Solar at 11401 Lamar Avenue, Overland Park, Kansas, 66211.

If you have any questions, please call me at (913) 458-7770.

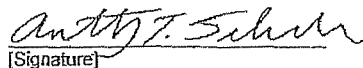
Very truly yours,

BLACK & VEATCH



Rick Solar
Project Manager

FFE Minerals USA Inc.
ACKNOWLEDGEMENT


[Signature]

ANTHONY T. FILIDORE
[Printed Name]

FGD INDUSTRY MANAGER
[Title]

17-NOV-2005
Date

cab
Enclosures



BLACK & VEATCH CORPORATION

~ INVOICE ~

PLEASE REMIT TO:
 BLACK & VEATCH CORPORATION
 P.O. BOX 803823
 KANSAS CITY MO 64180-3823
 FED ID : 431833073

CLIENT REF : 848252-0002X117
 INVOICE DATE : 05-JAN-2006
 PAYMENT DUE : 03-FEB-2006

J.P. (NICK) NICKLESS
 AMERICAN ELECTRIC POWER
 COST CONTROL CENTER
 1557 GRAVEL HILL ROAD
 CHESIRE, OH 45620

INVOICE NO : 191510
 PROJECT NAME : BIG SANDY OEM
 PROJECT NO : 141643
 B&V CONTACT : SOLAR, JOHN R
 TELEPHONE : 913/456-7770

JAN 9 7 006

COST CONTROL

DESCRIPTION	CONTRACT COMMITTED VALUE	PREVIOUSLY INVOICED	AMOUNT OF MILESTONE
ISSUE VACUUM FILTER PURCHASE ORDER	614,408.00	0.00	614,408.00
ISSUE MIST ELIMINATOR PURCHASE ORDER	153,602.00	0.00	153,602.00
TOTAL DUE (USD)			768,010.00
TOTAL BILLED TO DATE			5,376,070.00

WIRE TRANSFER INFORMATION :
 BLACK & VEATCH CORPORATION
 ACCOUNT NUMBER : 5336422
 COMMERCE BANK, N.A. KC, MO. USA
 ABA NUMBER : 101000019
 TELEX NO. 6715509, S.W.I.F.T. NO. CBKCUS44
 *****PLEASE INCLUDE INVOICE NUMBER*****

PARTIAL WAIVER OF LIEN

State of Kansas
County of Johnson

Black & Veatch Corporation, being duly sworn, states that:

The undersigned is a duly authorized officer of Black & Veatch Corporation (the "Contractor"). In consideration of \$ 768,010.00, Contractor waives any liens and right to a lien under the laws of Kentucky for all labor performed on and materials furnished up to and including December 30, 2005 in connection with Big Sandy Plant, Unit 2 WFGD, entered into on July 22, 2005 between Kentucky Power Company (the "Owner") and Black & Veatch Corporation (the "Contractor") involving work on Owner's property located at Owner's Big Sandy Plant near Louisa, Kentucky.

Contractor acknowledges that it has secured similar lien waivers from its subcontractors, suppliers, laborers, or material men.

This Partial Waiver of Lien is conditioned upon receipt of the scheduled payment of \$ 768,010.00 set forth above. This Partial Waiver of Lien does not include future scheduled payments for work yet to be performed and payments yet to be received under the Contract.

Dated : 1-6-06

Black & Veatch Corporation

By : Rick Solar
Rick Solar
Associate Vice President

Sworn before me and subscribed in my presence this 06 day of January, 2006:

Diane Schwartz
Notary
MCE 126-07



**AEP Tier II FGD Projects
 Big Sandy Unit 2**

Milestone Payment Breakdown

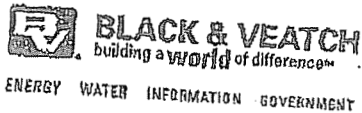
<u>Item Description</u>	<u>% of Contract Value</u>	<u>Expected Date</u>	<u>Milestone Amount</u>
Down Payment	8.0%	Jul-05	3,072,040
Submit documents for DRB	0.5%	Oct-05	192,003
Receive Chiyoda Basic Engineering Package (BEP)	1.5%	Oct-05	576,008
Initial issue of general arrangement drawings	0.7%	Nov-05	268,804
Issue JBR Shell Purchase Order	1.8%	Nov-05	691,209
Revise DBR documents	0.2%	Jan-06	76,801
Issue Ball Mill Purchase Order	1.7%	Jan-06	652,809
Issue Gas Cooler Purchase Order	1.5%	Jan-06	576,008
Issue JBR FRP Internals Purchase Order	2.3%	Jan-06	883,212
Issue Vacuum Filter Purchase Order	1.6%	Jan-06	614,408
Issue Oxidation Air Blower Purchase Order	0.6%	Jan-06	230,403
Issue P&IDs for routing	0.7%	Feb-06	268,804
Initial issue of control logic diagrams	0.3%	Feb-06	115,202
Initial issue of JBR ductwork drawings	0.3%	Feb-06	115,202
Issue Mist Eliminator Purchase Order	0.4%	Feb-06	153,602
Issue Agitator Purchase Order	0.4%	Feb-06	153,602
Issue Ductwork Material Purchase Order	0.6%	Feb-06	230,403
Issue Slurry and General Service Pump Purchase Order	1.1%	Mar-06	422,406
Initial issue of JBR external piping drawings	0.3%	Apr-06	115,202
Initial issue of limestone preparation piping drawings	0.3%	Apr-06	115,202
Initial issue of gypsum dewatering piping drawings	0.3%	Apr-06	115,202
Issue flow model PO	0.2%	Jun-06	76,801
Submit final flow model report	0.6%	Jan-07	230,403
Issue training program manuals	0.6%	Jul-07	192,003
Release Ball Mills for fabrication	3.0%	Dec-07	1,152,015
Release JBR Shell for fabrication	4.5%	Dec-07	1,728,023
Release Vacuum Filter for fabrication	3.1%	Mar-08	1,190,416
Release JBR FRP Internals for fabrication	5.9%	Mar-08	2,265,630
Release Gas Cooler for fabrication	2.4%	Apr-08	921,612
B&V Site Mobilization	1.0%	Jul-08	384,005
Site delivery of JBR Shell and Roof materials	6.0%	Aug-08	2,304,030
JBR Shell/Roof Erection Subcontractor Mobilization	1.1%	Aug-08	422,406
Site delivery of JBR FRP Internals	5.0%	Dec-08	1,920,025
JBR Sideshell erection complete	2.1%	Dec-08	806,411
JBR FRP Internals Erection Subcontractor Mobilization	2.9%	Dec-08	1,113,615
Site delivery of Gas Cooler	2.0%	Jan-09	768,010
Site delivery of Ductwork Material	1.0%	Jan-09	384,005
Site delivery of Ball Mills	4.0%	Feb-09	2,086,260
Site delivery of Vacuum Filters	4.0%	Feb-09	1,536,020
Site delivery of Mist Eliminators	1.0%	Feb-09	384,005
Site delivery of Oxidation Air Blowers	2.0%	Mar-09	768,010
Site delivery of Slurry and General Service Pumps	2.0%	Mar-09	768,010
JBR Upper and Lower Deck installation complete	4.9%	Mar-09	1,881,625
Gas Cooler erection complete	1.4%	May-09	537,607
JBR Outlet Ductwork erection complete	1.8%	Jun-09	691,209
Site delivery of Agitators	1.0%	Jun-09	384,005
JBR Internal Piping and Nozzles installation complete	2.9%	Jun-09	1,113,615
Mist Eliminator erection complete	0.6%	Jun-09	230,403
JBR Roof erection complete	1.0%	Jul-09	384,005
Mechanical completion	1.0%	Sep-09	384,005
Substantial completion	5.0%	Feb-10	1,920,025
Successful completion of Acceptance Test	1.0%	Apr-10	384,005
	100.0%		38,950,740

Note - total amount includes erection of JBR, JBR internals, gas cooler, outlet duct, and mist eliminator.

Revision Summary

1 - Incorporation of ball mill allowance into contract.

11/28/05



CT-121 OEM FGD Projects

B&V Project 141547
B&V File 62.1803.01A
December 12, 2005

Dorr-Oliver Elmco USA Inc.
2850 South Decker Lake Drive
Salt Lake City, UT 84119-2300
Telephone: 801-526-2506
Facsimile: 801-526-2823
Email: sean.enright@glv.com

Subject: Purchase Order Letter of Award
FGD Byproduct Dewatering

Attention: Mr. Sean Enright

Pending issuance of a formal Purchase Order, Black & Veatch Corporation (Purchaser) is pleased to issue this Letter of Award indicating our award to Dorr-Oliver Elmco USA Inc. (Supplier) covering the furnishing of FGD Byproduct Dewatering Equipment for the following Projects: Cardinal Units 1 & 2, Muskingum River Unit 5, Kyger Creek Units 1 thru 5, Conesville Unit 4 and Big Sandy Unit 2.

The Effective Date for items in the Schedule of Submittals and for the Delivery Schedule shall be November 9, 2005.

This Letter of Award is based on the requirements for Purchaser's Request for Quotation dated 9/6/05 (141448.62.1803), except as specifically stated below and attached.

- Section 00400 includes Price Breakdown, Option and/or Unit Adjustment Pricing (if applicable), Delivery Dates, and Schedule of Submittals.
- RFQ Commercial and Technical documents modified to reflect agreements reached during the negotiation and conditioning process of this Purchase Order.

In addition, this Letter of Award releases Supplier to proceed with the Work to the extent listed below, and upon Supplier's unqualified acceptance of this Letter of Award, is a binding commitment on the part of the Purchaser and Supplier.

- Supplier is released to proceed with all activities associated with the Work or only engineering activities associated required to maintain the agreed upon schedule, see below. The following are the associated Purchase Order Numbers and Price for each site. Refer to Section 00400 for further price breakdown.

Full Release for All Activities

Cardinal Units 1 & 2 - PO# 141547.62.1803, Firm Lump Sum Price of US\$2,969,380.00
Muskingum River Unit 5 - PO# 141641.62.1803, Firm Lump Sum Price of US\$1,485,270.00

Release for Engineering Only

Kyger Creek Units 1 thru 5 - PO# 141642.62.1803, Firm Lump Sum Price of US\$98,329.25 (Engineering Only). The balance of the Work Lump Sum Price is US\$1,868,255.75 which is subject to mutually agreed upon adjustments and become a Firm Lump Sum Price prior to Release to Manufacture.

Black & Veatch Corporation - 11401 Lamar - Overland Park, KS 66211 USA - Telephone: 913.468.2000

PAGE 02/03

DORR-OLIVER ELMCO

12/15/2005 01:05 8015262426

Page 2

Dorr-Oliver Eimco USA Inc.
Mr. Sean Enright

B&V Project 141647
December 12, 2005

Conesville Unit 4 – PO# 141644.62.1803, Firm Lump Sum Price of US\$72,398.75 (Engineering Only). The balance of the Work Lump Sum Price is US\$1,375,576.25 which is subject to mutually agreed upon adjustments and become a Firm Lump Sum Price prior to Release to Manufacture.

Big Sandy Unit 2 – PO# 141643.62.1803, Firm Lump Sum Price of US\$72,398.75 (Engineering Only). The balance of the Work Lump Sum Price is US\$1,375,576.25 which is subject to mutually agreed upon adjustments and become a Firm Lump Sum Price prior to Release to Manufacture.

The formal conformed Purchase Orders are currently under preparation and are scheduled for issuance shortly. Supplier agrees to execute such Purchase Orders and return to Purchaser within five working days of receipt, or, to notify Purchaser within said time frame that the Supplier deems that the conformed Purchase Order does not agree with this Letter of Award.

Please acknowledge acceptance of the above by your signature in the blocks designated below, and return the signed original document to Mr. Rick Solar at 11401 Lamar Avenue, Overland Park, Kansas, 66211.

If you have any questions, please call me at (913) 458-7770.

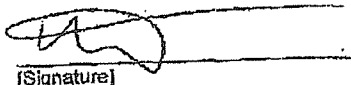
Very truly yours,

BLACK & VEATCH



Rick Solar
Project Manager

SUPPLIER ACKNOWLEDGEMENT
Dorr-Oliver Eimco



(Signature)

Nathan Nelson

(Printed Name)

Contract Administrator

(Title)

12/16/05

Date

cap
Enclosure

12/20/2005 TUE 9:19 FAX →→ Dave Taylor-efax

001/002



CT-121 OEM FGD Projects

B&V Project 141547
B&V File 62.2415.01A
December 19, 2005

Munters Corporation
108 Sixth Street
Fort Myers, FL 33911
Telephone: 800-448-8868 x727
Facsimile: 239-278-1318
Email: dtaylor@munters.com

Subject: Purchase Order Letter of Award
Mist Eliminators

Attention: David Taylor

Pending issuance of a formal Purchase Order, Black & Veatch Corporation (Purchaser) is pleased to issue this Letter of Award indicating our award to Munters Corporation (Supplier) covering the furnishing of Mist Eliminators for the following Projects: Cardinal Units 1 & 2, Muskingum River Unit 5, Conesville Unit 4 and Big Sandy Unit 2.

This Letter of Award is based on the requirements for Purchaser's Request for Quotation dated September 12, 2005 (141448.62.2415), except as specifically stated below and attached.

- Section 00400 includes Price Breakdown, Option and/or Unit Adjustment Pricing (if applicable), Delivery Dates, and Schedule of Submittals.
- RFQ Commercial and Technical documents modified to reflect agreements reached during the negotiation and conditioning process of this Purchase Order.

In addition, this Letter of Award releases Supplier to proceed with the Work to the extent listed below, and upon Supplier's unqualified acceptance of this Letter of Award, is a binding commitment on the part of the Purchaser and Supplier.

- Supplier is released to proceed with all activities associated with the Work associated required to maintain the agreed upon schedule, see below. The following are the associated Purchase Order Numbers and Price for each site. Refer to Section 00400 for further price breakdown.

Full Release for All Activities

Cardinal Units 1 & 2 – PO# 141547.62.2415, Firm Lump Sum Price of US\$769,965.00
Muskingum River Unit 5 – PO# 141641.62.2415, Firm Lump Sum Price of US\$393,830.00
Conesville Unit 4 – PO# 141644.62.2415, Firm Lump Sum Price of US\$544,525.00
Big Sandy Unit 2 – PO# 141643.62.2415, Firm Lump Sum Price of US\$548,625.00

12/20/2005 TUE 9:19 FAX →→→ David Taylor-efax

002/002

Page 2

Munters Corporation
Mr. David Taylor

B&V Project 141547
December 19, 2005

The formal conformed Purchase Orders are currently under preparation and are scheduled for issuance shortly. Supplier agrees to execute such Purchase Orders and return to Purchaser within five working days of receipt, or, to notify Purchaser within said time frame that the Supplier deems that the conformed Purchase Order does not agree with this Letter of Award.

Please acknowledge acceptance of the above by your signature in the blocks designated below, and return the signed original document to Mr. Rick Solar at 11401 Lamar Avenue, Overland Park, Kansas, 66211.

If you have any questions, please call me at (913) 458-7770.

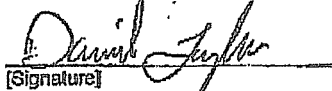
Very truly yours,

BLACK & VEATCH



Rick Solar
Project Manager

Munters Corporation
ACKNOWLEDGEMENT


[Signature]

DAVID TAYLOR
[Printed Name]

SALES MANAGER
[Title]

12-20-05
Date

cab
Enclosures



BLACK & VEATCH CORPORATION

~ INVOICE ~

PLEASE REMIT TO:
 BLACK & VEATCH CORPORATION
 P.O. BOX 803823
 KANSAS CITY MO 64180-3823
 FED ID : 431833073

CLIENT REF : 848252-0002X117
 INVOICE DATE : 02-FEB-2006
 PAYMENT DUE : 03-Mar-2006

J.P. (NICK) NICKLESS
 AMERICAN ELECTRIC POWER
 COST CONTROL CENTER
 1557 GRAVEL HILL ROAD
 CHESIRE, OH 45620

INVOICE NO : 193597
 PROJECT NAME : BIG SANDY OEM
 PROJECT NO : 141643
 BAY CONTACT : SOLAR, JOHN R
 TELEPHONE : 913/458-7770

CONTRACT COMMITTED VALUE	PREVIOUSLY INVOICED	AMOUNT OF MILESTONE
153,602.00	0.00	153,602.00
		153,602.00

DESCRIPTION
 Issue Agilator Purchase Order

TOTAL DUE (USD) 6,529,672.00

WIRE TRANSFER INFORMATION :
 BLACK & VEATCH CORPORATION
 ACCOUNT NUMBER : 5336422
 COMMERCE BANK, N.A. KC, MO, USA
 ABA NUMBER : 101000018
 TELEX NO. 6715509, S.W.I.F. T. NO. CBKDCUS44
 PLEASE INCLUDE INVOICE NUMBER

RECEIVED BY
 FEB 06 2006
 AFP
 COST CONTROL

PARTIAL WAIVER OF LIEN

State of Kansas
County of Johnson

Black & Veatch Corporation, being duly sworn, states that:

The undersigned is a duly authorized officer of Black & Veatch Corporation (the "Contractor"). In consideration of \$ 153,602.00, Contractor waives any liens and right to a lien under the laws of Kentucky for all labor performed on and materials furnished up to and including January 27, 2006 in connection with Big Sandy Plant, Unit 2 WFGD, entered into on July 22, 2005 between Kentucky Power Company (the "Owner") and Black & Veatch Corporation (the "Contractor") involving work on Owner's property located at Owner's Big Sandy Plant near Louisa, Kentucky.

Contractor acknowledges that it has secured similar lien waivers from its subcontractors, suppliers, laborers, or material men.

This Partial Waiver of Lien is conditioned upon receipt of the scheduled payment of \$ 153,602.00.00 set forth above. This Partial Waiver of Lien does not include future scheduled payments for work yet to be performed and payments yet to be received under the Contract.

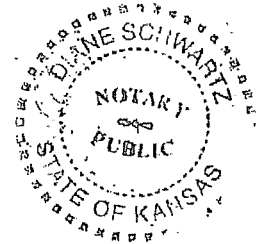
Dated : 2-3-06

Black & Veatch Corporation

By : Rick Solar
Rick Solar
Associate Vice President

Sworn before me and subscribed in my presence this 3rd day of February, 2006:

Diane Schwartz
Notary
MCE 1-25-07



**AEP Tier II FGD Projects
 Big Sandy Unit 2 - 141643**

Milestone Payment Breakdown

38,400,500

<u>Item Description</u>	<u>% of Contract</u>	<u>Date</u>	<u>Value</u>
Down Payment	8.0%	Jul-05	3,072,040
Submit documents for DRB	0.5%	Oct-05	192,003
Receive Chiyoda Basic Engineering Package (BEP)	1.5%	Oct-05	576,009
Initial issue of general arrangement drawings	0.7%	Nov-05	268,804
Issue JBR Shell Purchase Order	1.8%	Nov-05	691,209
Revise DBR documents	0.2%	Jan-06	76,801
Issue Ball Mill Purchase Order	1.7%	Jan-06	652,809
Issue Gas Cooler Purchase Order	1.5%	Jan-06	576,008
Issue JBR FRP Internals Purchase Order	2.3%	Jan-06	883,212
Issue Vacuum Filter Purchase Order	1.6%	Jan-06	614,405
Issue Oxidation Air Blower Purchase Order	0.6%	Jan-06	230,403
Issue P&IDs for routing	0.7%	Feb-06	268,804
Initial issue of control logic diagrams	0.3%	Feb-06	115,202
Initial issue of JBR ductwork drawings	0.3%	Feb-06	115,202
Issue Mist Eliminator Purchase Order	0.4%	Feb-06	153,602
Issue Agitator Purchase Order	0.4%	Feb-06	153,602
Issue Ductwork Material Purchase Order	0.6%	Feb-06	230,403
Issue Slurry and General Service Pump Purchase Order	1.1%	Mar-06	422,406
Initial issue of JBR external piping drawings	0.3%	Apr-06	115,202
Initial issue of limestone preparation piping drawings	0.3%	Apr-06	115,202
Initial issue of gypsum dewatering piping drawings	0.3%	Apr-06	115,202
Issue flow model P&ID	0.3%	Jun-06	76,801
Submit final flow model report	0.6%	Jan-07	230,403
Issue training program manuals	0.5%	Jul-07	192,003
Release Ball Mills for fabrication	3.0%	Dec-07	1,152,015
Release JBR Shell for fabrication	4.5%	Dec-07	1,728,023
Release Vacuum Filter for fabrication	3.1%	Mar-08	1,190,416
Release JBR FRP Internals for fabrication	5.9%	Mar-08	2,265,630
Release Gas Cooler for fabrication	2.4%	Apr-08	921,612
B&V Site Mobilization	1.0%	Jul-08	384,005
Site delivery of JBR Shell and Roof materials	6.0%	Aug-08	2,304,030
JBR Shell/Roof Erection Subcontractor Mobilization	1.1%	Aug-08	422,406
Site delivery of JBR FRP Internals	5.0%	Dec-08	1,920,025
JBR Sideshell erection complete	2.1%	Dec-08	806,411
JBR FRP Internals Erection Subcontractor Mobilization	2.9%	Dec-08	1,113,615
Site delivery of Gas Cooler	2.0%	Jan-09	768,010
Site delivery of Ductwork Material	1.0%	Jan-09	384,005
Site delivery of Ball Mills	4.0%	Feb-09	1,536,020
Site delivery of Vacuum Filters	4.0%	Feb-09	1,536,020
Site delivery of Mist Eliminators	1.0%	Feb-09	384,005
Site delivery of Oxidation Air Blowers	2.0%	Mar-09	768,010
Site delivery of Slurry and General Service Pumps	2.0%	Mar-09	768,010
JBR Upper and Lower Deck installation complete	4.9%	Mar-09	1,881,625

Gas Cooler erection complete	1.4%	May-09	537,607
JBR Outlet Ductwork erection complete	1.8%	Jun-09	691,209
Site delivery of Agitators	1.0%	Jun-09	384,005
JBR Internal Piping and Nozzles installation complete	2.9%	Jun-09	1,113,615
Mist Eliminator erection complete	0.6%	Jun-09	230,403
JBR Roof erection complete	1.0%	Jul-09	384,005
Mechanical completion	1.0%	Sep-09	384,005
Substantial completion	5.0%	Feb-10	1,920,025
Successful completion of Acceptance Test	1.0%	Apr-10	384,005
	100.0%		38,400,500

J0100



CT-121 OEM Projects

B&V Project 141547
B&V File 65.0702.01A
January 24, 2006

Mixtec North America
3625 South West Temple
Salt Lake City, UT 84115
Telephone: 801-265-1000 x173
Facsimile: 801-265-1080
Email: mhardcastle@westech-inc.com

Subject: Purchase Order Letter of Award
FGD Agitators

Attention: Mr. Mark Hardcastle

Pending issuance of a formal Purchase Order, Black & Veatch Corporation (Purchaser) is pleased to issue this Letter of Award indicating our award to Mixtec North America (Supplier) covering the furnishing of FGD Agitators for the following Projects: Cardinal Units 1 & 2, Muskingum River Unit 5, Kyger Creek Units 1 thru 5, Conesville Unit 4 and Big Sandy Unit 2.

This Letter of Award is based on the requirements for Purchaser's Request for Quotation dated 10/31/05 (141443 65 0702), except as specifically stated below and attached.

- Section 00400 includes Price Breakdown, Option and/or Unit Adjustment Pricing (if applicable), Delivery Dates, and Schedule of Submittals.
- RFQ Commercial and Technical documents modified to reflect agreements reached during the negotiation and conditioning process of this Purchase Order.

In addition, this Letter of Award releases Supplier to proceed with the Work to the extent listed below, and upon Supplier's unqualified acceptance of this Letter of Award, is a binding commitment on the part of the Purchaser and Supplier.

- Supplier is released to proceed with all activities associated with the Work required to maintain the agreed upon schedule. The following are the associated Purchase Order Numbers and Price for each site. Refer to Section 00400 for further price breakdown.

Full Release for All Activities

Cardinal Units 1 & 2 – PO# 141547.65.0702, Firm Lump Sum Price of US\$1,563,538.19

Muskingum River Unit 5 – PO# 141641.65.0702, Firm Lump Sum Price of US\$849,255.79

Kyger Creek Units 1 thru 5 – PO# 141642.65.0702, Firm Lump Sum Price of US\$1,308,585.52

Conesville Unit 4 – PO# 141644.65.0702, Firm Lump Sum Price of US\$846,420.83

Big Sandy Unit 2 – PO# 141643.65.0702, Firm Lump Sum Price of US\$799,884.47

The formal conformed Purchase Orders are currently under preparation and are scheduled for issuance shortly. Supplier agrees to execute such Purchase Orders and return to Purchaser within five working days of receipt, or, to notify Purchaser within said time frame that the Supplier deems that the conformed Purchase Order does not agree with this Letter of Award.

Page 2

Mixtec North America
Mr. Mark Hardcastle


B&V Project 141547
January 24, 2006

Please acknowledge acceptance of the above by your signature in the blocks designated below, and return the signed original document to Mr. Rick Solar at 11401 Lamar Avenue, Overland Park, Kansas, 66211.


If you have any questions, please call me at (913) 458-7770.

Very truly yours,

BLACK & VEATCH


Rick Solar
Project Manager

Mixtec North America
ACKNOWLEDGEMENT


[Signature]

Steven T. Brewster
[Printed Name]

President - WestTech dba Mixtec
[Title]

1-30-06
Date

cab
Enclosures

cc: R. Solar / File
G. Bergt
E. Sprinkle
E. L. DeForest
C. Bebow
T. Edsall
J. Bockelman
K. McAlpin
N. Winkel
N. Zirpie
S. Staehle
G. Zinkiewicz

Contractor: Black & Veatch Corporation
Contract/Release: 0482620902X117
Project: Big Sandy - O&M

Billing Control Form



Invoice #

Date: 11/1/2010

DATE	Bill Item / Milestone	Description	Contract Value	Revisions / Change Order	Revised Contract Value	Quantity / Percent This Period	Total This Period	Previous Total	Completed to Date	Cost Component	WBS	Work Order / Task
1	1.0	Down Payment	\$ 2,229,750	\$ 843,288	\$ 3,073,038	0%	\$ -	\$ 3,073,040	\$ 3,073,040	391	0.0	X117031501
2	2.0	Submit documents for ORB	\$ 130,288	\$ 52,705	\$ 182,993	0%	\$ -	\$ -	\$ -	391	0.0	X117031501
3	3.0	Receive Chiyoda Basin Engineering Package (BEP)	\$ 417,893	\$ 150,116	\$ 578,009	0%	\$ -	\$ 578,000	\$ 578,000	391	0.0	X117031501
4	4.0	Initial issue of nonanal arrangement drawings	\$ 105,017	\$ 73,787	\$ 178,804	0%	\$ -	\$ -	\$ -	391	0.0	X117031501
5	5.0	Issue JBR Shell Purchase Order	\$ 601,471	\$ 109,738	\$ 711,209	0%	\$ -	\$ -	\$ -	391	2.0	X117031501
6	6.0	Issue JBR documents	\$ 55,719	\$ 21,062	\$ 76,781	0%	\$ -	\$ -	\$ -	391	0.0	X117031501
7	7.0	Issue Ball Mill Purchase Order	\$ 473,612	\$ 176,197	\$ 649,809	0%	\$ -	\$ 652,000	\$ 652,000	391	2.0	X117031501
8	8.0	Issue Gas Cooler Purchase Order	\$ 417,893	\$ 159,116	\$ 577,009	0%	\$ -	\$ -	\$ -	391	2.0	X117031501
9	9.0	Issue JBR FRP Internals Purchase Order	\$ 648,769	\$ 242,443	\$ 891,212	0%	\$ -	\$ -	\$ -	391	2.0	X117031501
10	10.0	Issue Vacuum Filter Purchase Order	\$ 445,752	\$ 109,656	\$ 555,408	0%	\$ -	\$ 614,400	\$ 614,400	391	2.0	X117031501
11	11.0	Issue Oxidation Air Blower Purchase Order	\$ 107,157	\$ 63,246	\$ 170,403	0%	\$ -	\$ 230,400	\$ 230,400	391	2.0	X117031501
12	12.0	Issue P&IDs for routing	\$ 185,017	\$ 73,787	\$ 258,804	0%	\$ -	\$ -	\$ -	391	0.0	X117031501
13	13.0	Initial issue of control valve diagrams	\$ 83,679	\$ 31,623	\$ 115,302	0%	\$ -	\$ -	\$ -	391	0.0	X117031501
14	14.0	Initial issue of JBR ductwork drawings	\$ 63,679	\$ 31,623	\$ 95,302	0%	\$ -	\$ -	\$ -	391	0.0	X117031501
15	15.0	Issue Mist Eliminator Purchase Order	\$ 111,438	\$ 42,164	\$ 153,602	100%	\$ 153,602	\$ 153,602	\$ 153,602	391	2.0	X117031501
16	16.0	Issue Auxiliary Purchase Order	\$ 107,157	\$ 63,246	\$ 170,403	0%	\$ -	\$ -	\$ -	391	2.0	X117031501
17	17.0	Issue Ductwork Material Purchase Order	\$ 305,455	\$ 116,951	\$ 422,406	0%	\$ -	\$ -	\$ -	391	2.0	X117031501
18	18.0	Issue Slurry and General Service Pump Purchase Order	\$ 83,679	\$ 31,623	\$ 115,302	0%	\$ -	\$ -	\$ -	391	2.0	X117031501
19	19.0	Initial issue of JBR external piping drawings	\$ 83,679	\$ 31,623	\$ 115,302	0%	\$ -	\$ -	\$ -	391	2.0	X117031501
20	20.0	Initial issue of emissions preparation piping drawings	\$ 83,679	\$ 31,623	\$ 115,302	0%	\$ -	\$ -	\$ -	391	2.0	X117031501
21	21.0	Issue flow meter P&ID	\$ 83,679	\$ 31,623	\$ 115,302	0%	\$ -	\$ -	\$ -	391	4.0	X117031501
22	22.0	Issue final flow meter report	\$ 107,157	\$ 63,246	\$ 170,403	0%	\$ -	\$ 76,800	\$ 76,800	391	2.0	X117031501
23	23.0	Issue training program manuals	\$ 139,288	\$ 52,705	\$ 192,000	0%	\$ -	\$ -	\$ -	391	2.0	X117031501
24	24.0	Release JBR Mill for fabrication	\$ 835,785	\$ 316,230	\$ 1,152,015	0%	\$ -	\$ -	\$ -	391	2.0	X117031501
25	25.0	Release JBR Shell for fabrication	\$ 1,243,678	\$ 474,345	\$ 1,718,023	0%	\$ -	\$ -	\$ -	391	2.0	X117031501
26	26.0	Release Vacuum Filter for fabrication	\$ 603,645	\$ 376,771	\$ 980,416	0%	\$ -	\$ -	\$ -	391	4.0	X117031501
27	27.0	Release JBR FRP Internals for fabrication	\$ 1,643,711	\$ 621,919	\$ 2,265,630	0%	\$ -	\$ -	\$ -	391	2.0	X117031501
28	28.0	Release Gas Cooler for fabrication	\$ 608,828	\$ 252,984	\$ 861,812	0%	\$ -	\$ -	\$ -	391	2.0	X117031501
29	29.0	BSV Site Mobilization	\$ 278,585	\$ 105,410	\$ 383,995	0%	\$ -	\$ -	\$ -	391	2.0	X117031701
30	30.0	Site delivery of JBR Shell and Roof materials	\$ 1,671,670	\$ 632,440	\$ 2,304,110	0%	\$ -	\$ -	\$ -	391	2.0	X117031501
31	31.0	JBR Shell/roof Erection Subcontractor Mobilization	\$ 300,455	\$ 116,951	\$ 417,406	0%	\$ -	\$ -	\$ -	391	2.0	X117031701
32	32.0	Site delivery of JBR FRP Internals	\$ 1,202,075	\$ 627,050	\$ 1,829,125	0%	\$ -	\$ -	\$ -	391	2.0	X117031501
33	33.0	JBR Sideshell erection complete	\$ 585,050	\$ 221,301	\$ 806,351	0%	\$ -	\$ -	\$ -	391	2.0	X117031701
34	34.0	JBR FRP Internals Erection Subcontractor Mobilization	\$ 807,926	\$ 305,880	\$ 1,113,806	0%	\$ -	\$ -	\$ -	391	2.0	X117031701
35	35.0	Site delivery of Gas Cooler	\$ 557,190	\$ 210,820	\$ 768,010	0%	\$ -	\$ -	\$ -	391	2.0	X117031501
36	36.0	Site delivery of Ductwork Material	\$ 278,585	\$ 105,410	\$ 383,995	0%	\$ -	\$ -	\$ -	391	2.0	X117031501
37	37.0	Site delivery of Vacuum Filters	\$ 1,114,350	\$ 421,540	\$ 1,535,890	0%	\$ -	\$ -	\$ -	391	4.0	X117031501
38	38.0	Site delivery of Mist Eliminators	\$ 278,585	\$ 105,410	\$ 383,995	0%	\$ -	\$ -	\$ -	391	2.0	X117031501
39	39.0	Site delivery of Oxidation Air Blowers	\$ 557,190	\$ 210,820	\$ 768,010	0%	\$ -	\$ -	\$ -	391	2.0	X117031501
40	40.0	Site delivery of Slurry and General Service Pumps	\$ 557,190	\$ 210,820	\$ 768,010	0%	\$ -	\$ -	\$ -	391	2.0	X117031501
41	41.0	JBR Upper and Lower Deck Installation complete	\$ 1,365,116	\$ 519,509	\$ 1,884,625	0%	\$ -	\$ -	\$ -	391	2.0	X117031701
42	42.0	Gas Cooler erection complete	\$ 390,930	\$ 147,374	\$ 538,304	0%	\$ -	\$ -	\$ -	391	2.0	X117031701
43	43.0	JBR Ductwork erection complete	\$ 591,471	\$ 228,176	\$ 819,647	0%	\$ -	\$ -	\$ -	391	2.0	X117031701
44	44.0	Site delivery of Angles	\$ 278,585	\$ 105,410	\$ 383,995	0%	\$ -	\$ -	\$ -	391	2.0	X117031701
45	45.0	JBR Internal Piping and Nozzles Installation complete	\$ 307,926	\$ 305,880	\$ 613,806	0%	\$ -	\$ -	\$ -	391	2.0	X117031601
46	46.0	Mist Eliminator erection complete	\$ 107,157	\$ 63,246	\$ 170,403	0%	\$ -	\$ -	\$ -	391	2.0	X117031701
47	47.0	JBR Roof erection complete	\$ 278,585	\$ 105,410	\$ 383,995	0%	\$ -	\$ -	\$ -	391	2.0	X117031701
48	48.0	Mechanical completion	\$ 1,302,075	\$ 627,050	\$ 1,929,125	0%	\$ -	\$ -	\$ -	391	2.0	X117031701
49	49.0	Successful completion of Acceptance Test	\$ 278,585	\$ 105,410	\$ 383,995	0%	\$ -	\$ -	\$ -	391	2.0	X117031701

Total Contract Value	\$ 16,492,300
Invoiced to Date	\$ 6,019,972
Contract Balance	\$ 10,472,328

I certify that the quantities reported are accurate and complete to the best of my knowledge: *Pick Allen 2-9-06*

Approved for Payment

AEF #11031501



BLACK & VEATCH CORPORATION

~ INVOICE ~

PLEASE REMIT TO:
 BLACK & VEATCH CORPORATION
 P.O. BOX 803823
 KANSAS CITY MO 64180-3823
 FED ID : 431633073

CLIENT REF : 848252-0002X117
 INVOICE DATE : 3/10/2006
 PAYMENT DUE : 04/10/2006

RECEIVED BY
 MAR 13 2006
 AEP
 COST CONTROL

J.P. (NICK) NICKLESS
 AMERICAN ELECTRIC POWER
 COST CONTROL CENTER
 1557 GRAVEL HILL ROAD
 CHESIRE, OH 45620

INVOICE NO : 195867
 PROJECT NAME : BIG SANDY OEM
 PROJECT NO : 141643
 B&V CONTACT : SOLAR, JOHN R
 TELEPHONE : 913/458-7770

DESCRIPTION	CONTRACT COMMITTED VALUE	PREVIOUSLY INVOICED	AMOUNT OF MILESTONE
Issue Slurry Pumps Purchase Order	986,719.00	0.00	422,406.00

TOTAL DUE (USD) 422,406.00

TOTAL BILLED TO DATE 5,952,078.00

WIRE TRANSFER INFORMATION :
 BLACK & VEATCH CORPORATION
 ACCOUNT NUMBER : 5336422
 COMMERCE BANK, N.A. KC, MO. USA
 ABA NUMBER : 101000019
 TELEX NO. 6715509, S.W.I.F.T. NO. CBKCUS44
 ****PLEASE INCLUDE INVOICE NUMBER*****

PARTIAL WAIVER OF LIEN

State of Kansas
County of Johnson

Black & Veatch Corporation, being duly sworn, states that:

The undersigned is a duly authorized officer of Black & Veatch Corporation (the "Contractor"). In consideration of \$ 422,406.00, Contractor waives any liens and right to a lien under the laws of Kentucky for all labor performed on and materials furnished up to and including March 03, 2006 in connection with Big Sandy Plant, Unit 2 WFGD, entered into on July 22, 2005 between Kentucky Power Company (the "Owner") and Black & Veatch Corporation (the "Contractor") involving work on Owner's property located at Owner's Big Sandy Plant near Louisa, Kentucky.

Contractor acknowledges that it has secured similar lien waivers from its subcontractors, suppliers, laborers, or material men.

This Partial Waiver of Lien is conditioned upon receipt of the scheduled payment of \$ 422,406.00 set forth above. This Partial Waiver of Lien does not include future scheduled payments for work yet to be performed and payments yet to be received under the Contract.

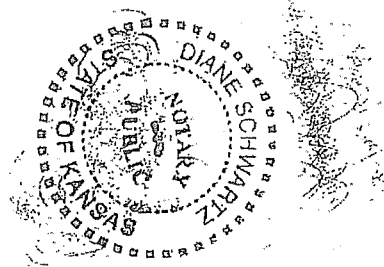
Dated : 3-10-06

Black & Veatch Corporation

By : Rick Solar
Rick Solar
Associate Vice President

Sworn before me and subscribed in my presence this 10th day of March, 2006:

Diane Schwartz
Notary
MCE 1-18-07



FEB 27 2006 16:00 FR METSO CS-CO

TO 919134587699 P.02/03



CT-121 OEM FGD Projects

B&V Project 141647
B&V File 62.2612.01A
February 21, 2006

Metso Minerals
621 S. Sierra Madre
Colorado Springs, CO 80903
Telephone: 719-386-0419
Facsimile: 719-386-0237
Email: Robert.ables@metso.com

Subject: Purchase Order Letter of Award
Slurry Pumps

Attn: Mr. Robert Ables

Pending issuance of a formal Purchase Order, Black & Veatch Corporation (Purchaser) is pleased to issue this Letter of Award indicating our award to Metso Minerals (Supplier) covering the furnishing of SLURRY PUMPS for the following Projects: Cardinal Units 1 & 2, Muskingum River Unit 5, Kyger Creek Units 1 thru 5, Conesville Unit 4 and Big Sandy Unit 2.

This Letter of Award is based on the requirements for Purchaser's Request for Quotation dated 11/18/05 (141448.62.2612), except as specifically stated below and attached.

- Section 00400 includes Price Breakdown, Unit Adjustment Pricing, Delivery Dates, and Schedule of Submittals.
- RFQ Commercial and Technical documents modified to reflect agreements reached during the negotiation and conditioning process of this Purchase Order.

In addition, this Letter of Award releases Supplier to proceed with the Work to the extent listed below, and upon Supplier's unqualified acceptance of this Letter of Award, is a binding commitment on the part of the Purchaser and Supplier.

- Supplier is released to proceed with all activities associated with the Work required to maintain the agreed upon schedule, see below. The following are the associated Purchase Order Numbers and Price for each site. Refer to Section 00400 for further price breakdown.

Full Release for All Activities

Cardinal Units 1 & 2 – PO# 141647.62.2612, Firm Lump Sum Price of US\$1,454,043.00
Kyger Creek Units 1 thru 5 – PO# 141642.62.2612, Firm Lump Sum Price of US\$1,403,997.00
Muskingum River Unit 5 – PO# 141641.62.2612, Firm Lump Sum Price of US\$850,990.00
Conesville Unit 4 – PO# 141644.62.2612, Firm Lump Sum Price of US\$895,439.00
Big Sandy Unit 2 – PO# 141643.62.2612, Firm Lump Sum Price of US\$986,719.00

The formal conformed Purchase Orders are currently under preparation and are scheduled for issuance shortly. Supplier agrees to execute such Purchase Orders and return to Purchaser within five working days of receipt, or, to notify Purchaser within said time frame that the Supplier deems that the conformed Purchase Order does not agree with this Letter of Award.

FEB 27 2006 16:01 FR METSO CS-CD

TO 919134587699 P.03/03

Page 2

Metso Minerals
Mr. Robert Ables

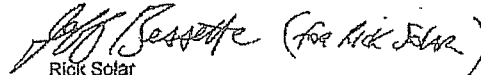
B&V Project 141547
February 21, 2006

Please acknowledge acceptance of the above by your signature in the blocks designated below, and return the signed original document to Mr. Rick Solar at 11401 Lamar Avenue, Overland Park, Kansas, 66211.

If you have any questions, please call me at (913) 458-7770.

Very truly yours,

BLACK & VEATCH


Rick Solar
Project Manager

Metso Minerals
ACKNOWLEDGEMENT



[Signature]

Bob Ables

[Printed Name]

Project Manager

[Title]

2/27/06

Date

cab
Enclosures

cc: R. Solar / File
G. Bergt
E. Sprinkle
G. Krage
C. Behow
T. Edsall
N. Zirple
E. Dean
S. Staehle
K. McAlpin
N. Winkel
G. Zinkiewicz

**AEP Tier II FGD Projects
 Big Sandy Unit 2 - 141643**

Milestone Payment Breakdown

38,400,500

<i>Item Description</i>	<i>% of Contract</i>	<i>Value</i>	<i>Date</i>
Down Payment	0.0%	0	0
Submit documents for DRB	0.5%	192,003	Oct-05
Receive Chiyoda Basic Engineering Package (BEP)	1.5%	576,009	Oct-05
Initial issue of general arrangement drawings	0.7%	268,804	Nov-05
Issue JBR Shell Purchase Order	1.8%	691,209	Nov-05
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Initial issue of gypsum dewatering piping drawings	0.3%	115,202	Apr-06
Issue Lower Mobilization	0.6%	230,403	Jan-07
Submit final flow model report	0.6%	230,403	Jan-07
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Release Ball Mills for fabrication	3.0%	1,152,015	Dec-07
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Release Vacuum Filter for fabrication	3.1%	1,190,416	Mar-08
Release JBR FRP Internals for fabrication	5.9%	2,265,630	Mar-08
Release Gas Cooler for fabrication	2.4%	921,612	Apr-08
B&V Site Mobilization	1.0%	384,005	Jul-08
Site delivery of JBR Shell and Roof materials	6.0%	2,304,030	Aug-08
JBR Shell/Roof Erection Subcontractor Mobilization	1.1%	422,406	Aug-08
Site delivery of JBR FRP Internals	5.0%	1,920,025	Dec-08
JBR Sideshell erection complete	2.1%	806,411	Dec-08
JBR FRP Internals Erection Subcontractor Mobilization	2.9%	1,113,615	Dec-08
Site delivery of Gas Cooler	2.0%	768,010	Jan-09
Site delivery of Ductwork Material	1.0%	384,005	Jan-09
Site delivery of Ball Mills	4.0%	1,536,020	Feb-09
Site delivery of Vacuum Filters	4.0%	1,536,020	Feb-09
Site delivery of Mist Eliminators	1.0%	384,005	Feb-09
Site delivery of Oxidation Air Blowers	2.0%	768,010	Mar-09
Site delivery of Slurry and General Service Pumps	2.0%	768,010	Mar-09
JBR Upper and Lower Deck installation complete	4.9%	1,881,625	Mar-09

Gas Cooler erection complete	1.4%	May-09	537,607
JBR Outlet Ductwork erection complete	1.8%	Jun-09	691,209
Site delivery of Agitators	1.0%	Jun-09	384,005
JBR Internal Piping and Nozzles installation complete	2.9%	Jun-09	1,113,615
Mist Eliminator erection complete	0.6%	Jun-09	230,403
JBR Roof erection complete	1.0%	Jul-09	384,005
Mechanical completion	1.0%	Sep-09	384,005
Substantial completion	5.0%	Feb-10	1,920,025
Successful completion of Acceptance Test	1.0%	Apr-10	384,005
	100.0%		38,400,500

Contractor: Black & Veatch Corporation
 Contract/Polinar: 848252002X117
 Project: Big Sandy - OEM

Billing Control Form



Date: 2/27/2009

Invoice # 495557

Bid Item / Misc	Description	Contract Value	Revisions / Change Orders	Revised Contract Value	Quantity / Percent This Period	Totals This Period	Previous Total	Completed to Date	Cost Component	WBS	Work Orders / Task
1.0	Down Payment	\$ 2,228,789	\$ 843,230	\$ 3,072,040	0%	\$ -	\$ 3,072,040	\$ -	391	9.N	X117031601
2.0	Submit documents for DRB	\$ 139,298	\$ 52,705	\$ 192,003	0%	\$ -	\$ -	\$ -	391	9.N	X117031601
3.0	Receive Chloroda Basis Engineering Package (BEP)	\$ 417,893	\$ 159,116	\$ 576,008	0%	\$ -	\$ 576,008	\$ -	391	9.N	X117031601
4.0	Initial issue of general arrangement drawings	\$ 195,017	\$ 73,787	\$ 268,804	0%	\$ -	\$ -	\$ -	391	9.N	X117031601
5.0	Issue JBR Shell Purchase Order	\$ 504,471	\$ 188,738	\$ 693,209	0%	\$ -	\$ -	\$ -	391	2.E.0	X117031601
6.0	Revise DRB documents	\$ 55,719	\$ 21,082	\$ 76,801	0%	\$ -	\$ -	\$ -	391	9.N	X117031601
7.0	Issue Ball Mill Purchase Order	\$ 473,812	\$ 178,197	\$ 652,009	0%	\$ -	\$ 652,009	\$ -	391	2.E.0	X117031601
8.0	Issue Gas Cooler Purchase Order	\$ 417,883	\$ 159,115	\$ 576,008	0%	\$ -	\$ -	\$ -	391	2.E.0	X117031601
9.0	Issue JBR FRP Internals Purchase Order	\$ 240,789	\$ 242,443	\$ 483,232	0%	\$ -	\$ -	\$ -	391	2.E.0	X117031601
10.0	Issue Vacuum Filler Purchase Order	\$ 445,762	\$ 159,555	\$ 605,317	0%	\$ -	\$ -	\$ -	391	4.G.2	X117031601
11.0	Issue Oxidation Air Blower Purchase Order	\$ 167,187	\$ 53,248	\$ 220,435	0%	\$ -	\$ 220,435	\$ -	391	2.E.0	X117031601
12.0	Issue P&IDs for routing	\$ 165,017	\$ 73,787	\$ 238,804	0%	\$ -	\$ -	\$ -	391	9.N	X117031601
13.0	Initial issue of control logic diagrams	\$ 83,579	\$ 31,623	\$ 115,202	0%	\$ -	\$ -	\$ -	391	9.N	X117031601
14.0	Initial issue of JBR ductwork drawings	\$ 83,579	\$ 31,623	\$ 115,202	0%	\$ -	\$ -	\$ -	391	2.E.0	X117031601
15.0	Issue Mist Eliminator Purchase Order	\$ 111,438	\$ 42,164	\$ 153,602	0%	\$ -	\$ 153,602	\$ -	391	2.E.0	X117031601
16.0	Issue Aquator Purchase Order	\$ 111,438	\$ 42,164	\$ 153,602	0%	\$ -	\$ 153,602	\$ -	391	2.E.0	X117031601
17.0	Issue Ductwork Material Purchase Order	\$ 167,187	\$ 53,248	\$ 220,435	0%	\$ -	\$ -	\$ -	391	2.E.0	X117031601
18.0	Issue Slurry and General Service Pump Purchase Order	\$ 306,455	\$ 115,951	\$ 422,406	100%	\$ 422,406	\$ -	\$ 422,406	391	2.E.0	X117031601
19.0	Initial issue of JBR external piping drawings	\$ 83,579	\$ 31,623	\$ 115,202	0%	\$ -	\$ -	\$ -	391	2.E.0	X117031601
20.0	Initial issue of gessstone preparation piping drawings	\$ 83,579	\$ 31,623	\$ 115,202	0%	\$ -	\$ -	\$ -	391	2.E.0	X117031601
21.0	Initial issue of gypsum seawater piping drawings	\$ 83,579	\$ 31,623	\$ 115,202	0%	\$ -	\$ -	\$ -	391	4.G.2	X117031601
22.0	Issue flow model PO	\$ 55,719	\$ 21,082	\$ 76,801	0%	\$ -	\$ 76,801	\$ -	391	2.E.0	X117031601
23.0	Submit final flow model report	\$ 167,187	\$ 53,248	\$ 220,435	0%	\$ -	\$ -	\$ -	391	2.E.0	X117031601
24.0	Issue training program manuals	\$ 139,298	\$ 52,705	\$ 192,003	0%	\$ -	\$ -	\$ -	391	9.N	X117031601
25.0	Release Ball Mills for fabrication	\$ 835,785	\$ 316,230	\$ 1,152,015	0%	\$ -	\$ -	\$ -	391	2.F.0	X117031601
26.0	Release Vacuum Filler for fabrication	\$ 253,678	\$ 474,346	\$ 1,728,023	0%	\$ -	\$ -	\$ -	391	2.F.0	X117031601
27.0	Release JBR FRP Internals for fabrication	\$ 893,645	\$ 328,771	\$ 1,222,416	0%	\$ -	\$ -	\$ -	391	4.G.2	X117031601
28.0	Release JBR FRP Internals for fabrication	\$ 1,843,711	\$ 621,919	\$ 2,465,630	0%	\$ -	\$ -	\$ -	391	2.E.0	X117031601
29.0	Release Gas Cooler for fabrication	\$ 688,628	\$ 252,984	\$ 941,612	0%	\$ -	\$ -	\$ -	391	2.E.0	X117031601
30.0	B&V Site Mobilization	\$ 278,995	\$ 105,410	\$ 384,405	0%	\$ -	\$ -	\$ -	210	2.E.0	X117031701
31.0	Site delivery of JBR Shell and Roof materials	\$ 1,571,570	\$ 632,460	\$ 2,204,030	0%	\$ -	\$ -	\$ -	391	2.E.0	X117031601
32.0	JBR Shell/roof Erection Subcontractor Mobilization	\$ 306,455	\$ 115,951	\$ 422,406	0%	\$ -	\$ -	\$ -	210	2.E.0	X117031701
33.0	Site delivery of JBR FRP Internals	\$ 1,392,975	\$ 527,050	\$ 1,920,025	0%	\$ -	\$ -	\$ -	391	2.E.0	X117031601
34.0	JBR Sideshell erection complete	\$ 695,050	\$ 221,851	\$ 916,901	0%	\$ -	\$ -	\$ -	210	2.E.0	X117031701
35.0	JBR FRP Internals Erection Subcontractor Mobilization	\$ 607,926	\$ 305,980	\$ 913,906	0%	\$ -	\$ -	\$ -	210	8.A.2	X117031701
36.0	Site delivery of Gas Cooler	\$ 557,190	\$ 210,620	\$ 767,810	0%	\$ -	\$ -	\$ -	391	2.E.0	X117031601
37.0	Site delivery of Ductwork Material	\$ 278,995	\$ 105,410	\$ 384,405	0%	\$ -	\$ -	\$ -	391	2.E.0	X117031601
38.0	Site delivery of Ball Mills	\$ 1,114,380	\$ 871,880	\$ 1,986,260	0%	\$ -	\$ -	\$ -	391	2.F.0	X117031601

SP			\$	1,114,380	\$	616,730	\$	1,631,170		0%	\$		\$																	
39.0		Site delivery of Vacuum Filters	\$	278,595	\$	105,410	\$	384,005		0%	\$		\$																	
40.0		Site delivery of Mist Eliminators	\$	557,190	\$	284,371	\$	841,561		0%	\$		\$																	
41.0		Site delivery of Oxidation Air Blowers	\$	557,190	\$	210,820	\$	768,010		0%	\$		\$																	
42.0		Site delivery of Slurry and General Service Pumps	\$	1,385,118	\$	575,509	\$	1,960,627		0%	\$		\$																	
43.0		JBR Upper and Lower Deck installation complete	\$	390,033	\$	147,674	\$	537,707		0%	\$		\$																	
44.0		Gas Cooler erection complete	\$	501,471	\$	189,738	\$	691,209		0%	\$		\$																	
45.0		JBR Outlet Ductwork erection complete	\$	278,595	\$	105,410	\$	384,005		0%	\$		\$																	
46.0		Site delivery of Aqualators	\$	167,157	\$	63,248	\$	230,405		0%	\$		\$																	
47.0		JBR Internal Piping and Nozzles installation complete	\$	807,928	\$	303,689	\$	1,111,617		0%	\$		\$																	
48.0		Mist Eliminator erection complete	\$	278,595	\$	105,410	\$	384,005		0%	\$		\$																	
49.0		JBR Roof erection complete	\$	278,595	\$	105,410	\$	384,005		0%	\$		\$																	
50.0		Mechanical completion	\$	1,392,875	\$	627,050	\$	1,920,025		0%	\$		\$																	
51.0		Substantial completion	\$	278,595	\$	105,410	\$	384,005		0%	\$		\$																	
52.0		Successful completion of Acceptance Test	\$	278,595	\$	105,410	\$	384,005		0%	\$		\$																	
53.0			\$	27,859,200	\$	11,897,814	\$	39,757,014			\$		\$																	
													\$	422,408	\$	6,592,272	\$	5,982,078												
													Total Contract Value		\$	26,132,641														
													Invoiced to Date		\$	3,958,078														
													Contract Balance		\$	32,174,563														

I certify that the quantities reported are accurate and complete to the best of my knowledge: Reckle, Adela

Approved for Payment

ABF Representative

AMERICAN
ALL
POWER
FORWARD

Report ID: GLGT501
 AEP Financials
 JOURNAL ENTRY DETAIL REPORT
 Page No. 1
 Run Date 10/26/2011
 Run Time 3:30:06PM

Unit: 117
 Journal ID: OAABSZFGD
 Date: 4/30/2006
 Journal status: P
 Description: WORK ORDERS SUSPENDED, REVERSE AFUDC AND TRANSFER REMAINING BALANCE TO 1650000

Ledger Group: ACTUALS
 Source: UPL
 Reversal: N
 Reversal Date:

Foreign Currency: USD
 Rate Type: CRRNT
 Effective Date: 5/1/2006
 Exchange Rate: 1.00
 Trans Ref Num: NONREC



Line	Description	Unit	Account	Reference	Amount	Debit	Credit	Balance	Currency
1	117 1070001 99990 REVERSEAFUDC	WSREG	000008348	X116976001 Open Item Key:	15,723,476.07		-5,262.57	-5,262.57	USD
2	117 1070001 99990 REVERSEAFUDC	WSREG	000008348	X116976001 Open Item Key:			-8,386.24	-8,386.24	USD
3	117 1070001 99990 REVERSEAFUDC	WSREG	000008348	X116976201 Open Item Key:			-8,112.92	-8,112.92	USD
4	117 1070001 99990 REVERSEAFUDC	WSREG	000008348	X116976201 Open Item Key:			-6,432.96	-6,432.96	USD
5	117 1070001 99990 REVERSEAFUDC	WSREG	000008348	X116977001 Open Item Key:			-3,955.66	-3,955.66	USD
6	117 1070001 99990 REVERSEAFUDC	WSREG	000008348	X116977001 Open Item Key:			-3,451.28	-3,451.28	USD
7	117 1070001 99990 REVERSEAFUDC	WSREG	000008348	X116976001 Open Item Key:			-17,987.02	-17,987.02	USD
Total Lines:					30	Total Base Debit:	15,723,476.07	Total Base Credit:	15,723,476.07

AEP Financials
JOURNAL ENTRY DETAIL REPORT

Unit: 117 Report ID: GLC7501 Page No. 3
 Journal ID: 0AABS2FGD Run Date: 10/26/2011
 Date: 4/30/2016 Run Time: 3:30:06PM
 Journal status: P
 Description: WORK ORDERS SUSPENDED, REVERSE AFUDC AND TRANSFER REMAINING BALANCE TO 1630000

Foreign Currency: USD
 Rate Type: CRRNT
 Effective Date: 5/1/2006
 Exchange Rate: 1.00
 Trans Ref Num: NONREC

Unit	Journal ID	Date	Journal status	Description	Ledger Group	Source	Reversal	Reversal Date	ACTUALS	UPL	Reference	Item Key	Amount	Currency
16	117	1070001	S9990	REVERSE AFUDC	WSREG	000006633	N		CRRNT	X117031101	Open Item Key	1,000,000.00	USD	
												024	-8,752.20	USD
17	117	1070001	S9990	REVERSE AFUDC	WSREG	000006633	N		CRRNT	X117031201	Open Item Key	1,000,000.00	USD	
												023	-3,590.77	USD
18	117	1070001	S9990	REVERSE AFUDC	WSREG	000006633	N		CRRNT	X117031201	Open Item Key	1,000,000.00	USD	
												024	-3,605.88	USD
19	117	1070001	S9990	REVERSE AFUDC	WSREG	000006633	N		CRRNT	X117031501	Open Item Key	1,000,000.00	USD	
												023	-4,946.43	USD
20	117	1070001	S9990	REVERSE AFUDC	WSREG	000006633	N		CRRNT	X117031501	Open Item Key	1,000,000.00	USD	
												024	-4,535.45	USD
21	117	1070001	S9990	REVERSE AFUDC	WSREG	000006633	N		CRRNT	X117031401	Open Item Key	1,000,000.00	USD	
												023	-85,562.52	USD
22	117	1070001	S9990	REVERSE AFUDC	WSREG	000006633	N		CRRNT	X117031401	Open Item Key	1,000,000.00	USD	
												024	-81,928.47	USD
23	117	1070001	S9990	REVERSE AFUDC	WSREG	000006633	N		CRRNT	X117031501	Open Item Key	1,000,000.00	USD	
												023	-85,923.27	USD

Unit: 117 Ledger Group: ACTUALS Foreign Currency: USD
 Journal ID: OAABS2FGD Source: UPL Rate Type: CRRNT
 Date: 4/30/2006 Reversal: N Effective Date: 5/1/2006
 Journal status: P Reversal Date: Exchange Rate: 1.00
 Description: WORK ORDERS SUSPENDED, REVERSE AFUDC AND TRANSFER REMAINING BALANCE TO 18330000 Trans Ref Num: NONREC

Unit	Journal ID	Date	Journal status	Description	Ledger Group	Source	Reversal	Reversal Date	Reference	Account	Amount	Foreign Currency	Rate Type	Effective Date	Exchange Rate	Trans Ref Num	
24	117	1070001	99990	REVERSE AFUDC	WSREG	000006633			CRRNT X117031501 Open Item Key:	1,00000000	-75,047.52	USD	974				
25	117	4320000	99990	REVERSE AFUDC	NONBU	GLMANDA			CRRNT G0000117 Open Item Key:	1,00000000	227,134.50	USD	974				
26	117	4191000	99990	REVERSE AFUDC	NONBU	GLMANDA			CRRNT G0000117 Open Item Key:	1,00000000	210,078.54	USD	974				
27	117	1070001	99990	REVERSE AFUDC	WSREG	000006633			CRRNT W001453401 Open Item Key:	1,00000000	-13,563,663.54	USD	974				
28	117	1070001	99990	Transfer Remaining Balance	WSREG	000006633			CRRNT W001453301 Open Item Key:	1,00000000	-1,646,741.38	USD	974				
29	117	1833000	99990	Transfer Remaining Balance	WSREG	000006633			CRRNT 4075924001 Open Item Key:	1,00000000	13,563,663.54	USD	974				
30	117	1833000	99990	Transfer Remaining Balance	WSREG	000006633			CRRNT 4075924001 Open Item Key:	1,00000000	1,646,741.38	USD	974				

Kentucky Power
Big Sandy FGD BIG SANDY
Landfill Scrubber /FGD

Sum of amount	cost_element	cost_element description	project	8348	9633	Grand Total	
	020	construction and retirement overheads.		\$ 111,253.82	\$ 911,461.18	\$ 1,022,715.00	
	023	Allowance for borrowed funds used during construction (Debt)		\$ (682.23)	\$ (1,278.12)	\$ (1,960.35)	
	024	Allowance for other funds used during construction (Equity)		\$ (752.27)	\$ (1,409.33)	\$ (2,161.60)	
	11E	Exempt Labor		\$	\$ 33,502.98	\$ 33,502.98	
	11N	Non Exempt Labor		\$	\$ 2,756.91	\$ 2,756.91	
	120	Labor Fringes (Straight-time)		\$	\$ 25,337.87	\$ 25,337.87	
	121	Labor Fringes (Overtime)		\$	\$ 22.62	\$ 22.62	
	122	Labor Fringes (Incentive Accruals)		\$	\$ 927.01	\$ 927.01	
	123	Labor Fringes -Other NTL Pymt		\$	\$ 66.71	\$ 66.71	
	125	Payroll Dist Nonproductive		\$	\$ 10,831.37	\$ 10,831.37	
	13E	Exempt OT Labor		\$	\$ 186.15	\$ 186.15	
	141	Incentive Accrual Dept Level		\$	\$ 6,967.02	\$ 6,967.02	
	143	Other Lump Sum Payments		\$	\$ 6.17	\$ 6.17	
	145	Stock-based Compensation		\$	\$ 80.98	\$ 80.98	
	146	Safety Incentive Payments		\$	\$ 551.13	\$ 551.13	
	149	Fossil & Hydro Gen Incentives		\$	\$ 681.35	\$ 681.35	
	1AA	Payroll Labor Accruals		\$	\$ -	\$ -	
	1AB	Labor Accrual Reversals		\$	\$ -	\$ -	
	210	Contract Labor (General)	\$	\$ 3,660.50	\$ 64,753.37	\$ 68,413.87	
	214	Outside Shop Service		\$	\$ 692.72	\$ 692.72	
	260	Outside Services - Professional Services/ Expenses (General)	\$	\$ 630,931.90	\$ 4,378,033.19	\$ 5,008,965.09	
	266	Outside Services - Engineering		\$	\$ 319,988.45	\$ 319,988.45	
	285	Temporary Staffing	\$	\$ 7,093.74	\$ 46,809.40	\$ 53,903.14	
	290	Outside Services Gen - Other	\$	\$ 31,966.82	\$ 469,294.87	\$ 501,261.69	
	310	MMS From Stock General		\$	\$ 13,085.64	\$ 13,085.64	
	390	Direct Purchase-Other Than MMS		\$	\$ 1,425.61	\$ 1,425.61	
	391	Material Outside Contractor		\$	\$ 5,952,079.00	\$ 5,952,079.00	
	393	Sales & Use Tax Accrual	\$	\$ 3.04	\$ (0.00)	\$ 3.04	
	411	Vehicle Distribution - Other		\$	\$ 8.84	\$ 8.84	
	413	Fleet Clearing		\$	\$ 20.23	\$ 20.23	
	510	Busin Exp 100% Deduct Gen		\$	\$ 6,105.52	\$ 6,105.52	
	520	Business Exp Part Deduct Gen		\$	\$ 1,057.02	\$ 1,057.02	
	620	Overheads		\$	\$ 38.35	\$ 38.35	
	738	Shared Services - Fleet products/services.		\$	\$ 278.96	\$ 278.96	
	780	AEPSC Bill	\$	\$ 225,202.03	\$ 1,306,533.69	\$ 1,531,735.72	
	935	Insurance Proceeds		\$	\$ 3.85	\$ 3.85	
	941	Land Purchase	\$	\$ 630,018.00	\$	\$ 630,018.00	
	999	Miscellaneous All Other	\$	\$ 10,045.00	\$	\$ 10,045.00	
	9AA	Accounts Payable Accruals	\$	\$ 848,076.84	\$ 11,810,630.16	\$ 12,658,707.00	
	9AB	Accounts Payable Accruals Reversal	\$	\$ (848,076.84)	\$ (11,806,130.16)	\$ (12,654,207.00)	
	U3E	Exempt Uncompensated Overtime		\$	\$ 8,176.89	\$ 8,176.89	
	Grand Total			\$ 1,648,740.35	\$ 13,563,577.60	\$ 15,212,317.95	
				Per Journal Entry OAABSGD 04/30/2006	\$ 1,648,741.38	\$ 13,563,683.54	\$ 15,212,424.92
				Difference	\$ 1.03	\$ 105.94	\$ 106.97

Kentucky Power Company

REQUEST

Refer to Kentucky Power's response to Staff's First Request, Item 23. Attachment 1 summarizes the 2004-2011 scrubber projects at various AEP plants. The \$/kW column for the 800 MW units appears to have a range between \$385 per kW at Amos to \$755 per kW at Big Sandy Unit 2, as referenced in Staff's First Request, Item 17, among the different 800 MW units. Explain the reasons for the wide range of \$/kW cost.

RESPONSE

A number of factors give rise to the range of costs. Most common are the effects of inflation in construction costs and the ability to use common facilities in connection with multiple facilities. For example, the nominal cost at Amos must be converted to 2011-2016 dollars. Escalating the Amos cost of \$385/kW to reflect performing this project in the 2011 - 2016 timeframe (5.1% per year for 5 years) results in a cost of \$494/kW. Taking the \$755/kW estimated cost for Big Sandy 2 and deducting the 20% contingency equates to \$629/kW, producing a \$135/kW or \$108M difference. This difference is a result of being able to utilize common FGD material handling, material preparation and dewatering equipment at Amos, as well as the common landfill, and being able to spread the costs across all three units at Amos. Big Sandy 2 incurs these costs on a stand-alone basis.

WITNESS: Robert L Walton

Kentucky Power Company

REQUEST

Refer to Kentucky Power's response to Staff's First Request, Item 25. Explain whether or not Kentucky Power used a bid process in the selection of the architect/engineer engaged for the Big Sandy Unit 2 project.

RESPONSE

Kentucky Power did not formally solicit competitive proposals for architect/engineering services specifically for the Big Sandy 2 project. The architect/engineer was selected as outlined in the response to Commission Staff's First Request, Item 25b.

WITNESS: Ranie K. Wohnhas

Kentucky Power Company

REQUEST

Refer to Kentucky Power's response to Staff's First Request, Item 26. On page 5, lines 20-23, of the direct Testimony of Robert L. Walton, it states, "[t]he formal process begins with the preparation and approval of a Capital improvement Requisition (CI)." Kentucky Power's response to Staff's First Request, Item 26.b. states, "[t]he CI was approved by the AEP Subcompany Board on January 26, 2012."

- a. Explain whether the formal process of the Big Sandy DFGD began on January 26, 2012.
- b. If the response to part a. of this request is yes, explain whether the formal process of the Big Sandy DFGD began as a result of Staff's First Request.
- c. Provide a description of an "AEP Subcompany Board." Who are the board members and what are the board's functions within the AEP corporate framework?

RESPONSE

- a. No. The CI provided in Staff's First Request, Item 26.b. was the approved Revision 4 to the original Big Sandy FGD CI that was approved in 2004.
- b. N/A
- c. The Subcompany Board of Directors meets monthly and authorizes various types of transactions, such as the election of officers, the issuances of securities, and the approval of capital and lease improvements.

The Subcompany Board consists of the following 8 individuals:

President and Chief Executive Officer, American Electric Power
Executive Vice President - AEP Transmission, American Electric Power
Senior Vice President, General Counsel and Secretary, American Electric Power
Executive Vice President - Generation, American Electric Power
Executive Vice President and Chief Operating Officer, American Electric Power
Senior Vice President - Shared Services, American Electric Power
Executive Vice President and Chief Financial Officer, American Electric Power
Executive Vice President and Chief Administrative Officer, American Electric Power

WITNESS: Robert L Walton

Kentucky Power Company

REQUEST

Refer to Staff's First Request, Item 26, Attachment 1.

- a. The CI states that "The WFGD scope of work was suspended in 2006. . ." Explain how Kentucky Power planned to satisfy its capacity and energy requirements at the time it entered into the 2007 New Source Review Consent Decree.
- b. Explain whether or not it is required that the AEP Subcompany Board approve CI's that exceed \$900 million in total capital expenditures. If so, has the AEP Subcompany Board approved the CI for the construction of the Big Sandy Unit 2 DFGD?
- c. Provide the approval limits of the AEP Subcompany Board and the AEP Board.
- d. Provide the amount and type of expenditures on the Big Sandy DFGD project prior to the AEP Subcompany Board approval on January 26, 2012.

RESPONSE

- a. KPCo's intended to retrofit Big Sandy Unit 2 with FGD technology in accordance with the Consent Decree.
- b. Yes, it is required that the AEP Subcompany Board approve the total CI capital expenditures required for the Big Sandy 2 DFGD project. The AEP Subcompany Board will approve several CI revisions, aggregating in value, in the phased approach described in Company witness Walton's Direct Testimony pages 5 through 8, culminating with the Phase III revision authorizing the construction of the DFGD project.
- c. There are no approval limits associated with the AEP Subcompany Board.
- d. Please see Page 2 of this response.

WITNESS: Robert L Walton

Direct Costs	Cost Category	Description	2004	2005	2006	2008	2009	2010	2011
	Internal Labor	Internal labor	46,485	404,943	155,212			347,568	133,933
	Mats And Supplies	FGD vendor (B&V) suppliers	145	4,774,568	1,202,841			37	
	Other Cost Cat	Expenses	946	49,631	64,217		1,365	6,447	17,071
	Outside Svcs	Architect Engineer & Professional Services	268,776	4,641,598	1,100,515	603,789	259,354	1,199,504	1,003,799
Direct Costs		Sum:	316,352	9,870,741	2,522,785	603,789	260,717	1,553,556	1,154,804
Indirect Costs	AFUDC & Overheads	Sum:	76,735	1,131,475	705,869	211,877	34,416	769,381	760,728
Total Costs		Sum:	393,087	11,002,216	3,228,654	625,665	295,133	2,322,937	1,915,532

Kentucky Power Company

REQUEST

Refer to Staff's First Request, Item 30. Explain whether the technical requirement of a 0.09lb/mmBtu SO₂ emission rate (98% removal efficiency) is necessary to comply with the requirements of the 2007 New Source Review Consent Decree or whether the higher removal efficiency is required to meet the Cross-State Air Pollution Rule, Mercury, and Air Toxics Standards, and National Ambient Air Quality Standard limits.

RESPONSE

The requirement is necessary to comply with the Cross-State Air Pollution Rule. Taking a three year average (2008-2010) of annual emitted tons of SO₂ when burning the current 1.4 lb/mmBTU fuel and equating that to annual tons of SO₂ when burning a 4.5 lb/mmBTU fuel, a minimum 94% reduction is required to meet the 2014 allocations under the CSAPR, with no margin. The 98% removal efficiency provides a necessary margin to cover upset conditions and unit startups and shutdowns and still remain within the allowances.

WITNESS: Robert L Walton

Kentucky Power Company

REQUEST

Refer to Kentucky Power's response to Staff's First Request, Item 32. Explain when the requested information will be made available.

RESPONSE

The requested information is anticipated to be available in the fourth quarter of 2012 at the conclusion of Phase I activities.

WITNESS: Robert L. Walton

Kentucky Power Company

REQUEST

Refer to Kentucky Power's response to Staffs First Request, Item 45. The response states, "KPCo does not plan to use the ESPs with the NID technology, resulting in an approximate 2 MW savings in auxiliary at full load."

- a. Explain whether the Electro-Static Precipitators ("ESPs"), will be retired.
- b. If the answer to part a. this request is yes, provide the amount of original cost and associated accumulated depreciation of the ESPs as of September 30, 2009.

RESPONSE

- a. Yes, the ESP will be retired.
- b. The detailed ESP gross plant cost and accumulated depreciation is not readily available. Property other than mass Distribution investment in accounts 364-373 is maintained in the Company's continuing property records by record unit where the record unit is defined as the account title (the record unit for account 312, Boiler Plant Equipment is defined as "Boiler Plant Equipment"). Therefore, further detailed categorization of the equipment in this account and other Steam Generation Plant accounts is not available. FERC Order No. 598 permits utility companies to keep their property records at a record unit level and book estimated retirements.

The Company is currently developing an estimate to answer the request; however, it cannot provide the estimate at this time. The Company expects to provide the information in a supplemental response no later than February 24, 2012.

WITNESS: Ranie K Wohnhas

Kentucky Power Company

REQUEST

Refer to the response to Staff's First Request, Item 49.

- a. The response at c. describes the source of the natural gas price as "a combination of the AEP-Fundamental Analysis group's commodity pricing forecast and AEP-FEL's indicative estimates for the cost of gas delivered to the Big Sandy facility." Provide a description of the information that the AEP groups relied on to make their projections and the method they used to develop the natural gas price projections.
- b. Describe how these forecasts were combined.
- c. It appears that the Fleet Transmission-CSAPR "Base" Fleet natural gas forecast used in the Strategist Model for the base case is 33 to 35 percent above the EIA Annual Energy Outlook 2011 forecast. In addition, the Energy Information Administration Annual Energy Outlook 2012 Early Release indicates that natural gas price forecasts will remain below \$5.00 per thousand cubic feet through 2023. Explain the difference and impact this has on the resultant analysis.

RESPONSE

- a. See response to Sierra Club 1-47 and the supplemental response to Sierra Club 1-47 dated February 16, 2012.
- b. In order to create a natural gas commodity price, the AEP Fundamental Analysis group's forecast of Henry Hub gas price was adjusted by a 50/50 split of the forecasted of TGPL Zone 1 and Zone 4 basis differentials from the Henry Hub price. The resulting commodity price was then adjusted to capture gas retainage. Firm and interruptible transportation variable costs were then added to the retainage adjusted commodity price to create a delivered cost of gas to the Big Sandy facility.

- c. The EIA Annual Energy Outlook differs from the Company's Fleet Transition-CSAPR Base case primarily in its projection of the impact of impending environmental regulations, specifically the economic viability of uncontrolled coal-fired generation. For example, the Company envisions more coal-fired generation retirements related to HAPs regulations and consequently, more natural gas-fired replacements resulting in greater gas demand and appropriately higher prices. Additionally, the Company projects a CO2 policy beginning in 2022 (not projected by the EIA) which results in additional gas demand.

The Company would also offer that it is imperative not to compare nominal dollar forecasts to real dollar (inflation-adjusted) forecasts. The EIA's AEO 2011 presents natural gas pricing in both nominal dollars and real dollars at both the Henry Hub and for an Average Lower 48 Wellhead Price. A comparison between the Company's Fleet Transition-CSAPR Base Henry Hub natural gas price forecast (nominal \$) and the EIA's AEO 2011 Reference Henry Hub natural gas price (nominal \$) reveals yearly differences that average less than 10 %.

WITNESS: Scott C Weaver

Kentucky Power Company

REQUEST

Refer to the response to Staff's First Request, Item 50.

- a. Part a. of the response indicates that Kentucky Power is "under the notion that this Commission would ultimately desire such a regional/local 'metal-in-the ground' solution." Provide support for this comment.
- b. Describe in more detail the reference in part a. to "PJM-RPM market pricing vagaries."
- c. For initial modeling runs, it may be reasonable to assume proxies for market purchases. However, without soliciting capacity and power purchases from the market (PJM or otherwise) and all neighboring generators, explain how Kentucky Power has performed its proper due diligence in seeking a best and least-cost option.
- d. To the extent possible, provide the results of recent short and medium term power purchase/auctions on the PJM system.

RESPONSE

- a. As indicated in the response, that was a notional statement. The Company has no definitive understanding as to this Commission's ultimate desire in this regard. See also the response to Staff Second Request, Item No. 16.
- b. This statement suggests that there is greater market uncertainty around the price of replacement (RPM) capacity as well as energy vis-a-vis the relative stable costs-of-service associated with the Big Sandy units. For instance, page 3 of this response offers a comparison of the historical PJM base residual auction (BRA) clearing prices for capacity from the initial 2007/08 planning year BRA to the most recent auction for the 2014/15 planning year.

Further, page 4 of this response offers a profile of recent (2010 and 2011) historical PJM day-ahead and real-time hourly locational marginal pricing (LMP) -- for energy pricing at the AEP Generation Hub. Finally, on page 5 of this response a view is offered of such PJM day-ahead daily price variation "frequencies" for those respective years, overlaying similar comparisons for NYMEX daily spot natural gas commodity pricing. It indicates that for each of those years, LMP day-ahead pricing exhibits significantly more daily pricing volatility than does, particularly, daily natural gas commodity pricing. This greater volatility can be rationalized to some degree by recognizing that LMP also must consider daily load/weather swings, nodal congestion points on the grid, marginal losses, as well as the fact that this commodity --unlike natural gas-- cannot be stored.

With that, the statement was then intended to suggest that with an assumed retirement of both Big Sandy Units 1 and 2, the more significant block of eliminated capacity and energy from those units would result in the "extended" (dollar) cost of any such replacement PJM market capacity and energy would naturally become even more varied.

- c. To affirm the response to Staff First Request, Item No. 50, the Company views the PJM-RPM market construct for capacity, as well as the PJM energy market, as a very reasonable interim or "bridge" valuation basis, only, between the period in which the Big Sandy units would be retired and new-build combined cycle capacity would be built (modeled Options #4A and #4B). Both commodity constructs represent transparent and fungible markets.
- d. Page 6 of this response offers a high-level transaction summary of, typically, short-term power and energy auctions occurring within PJM in which AEP was the selling party.

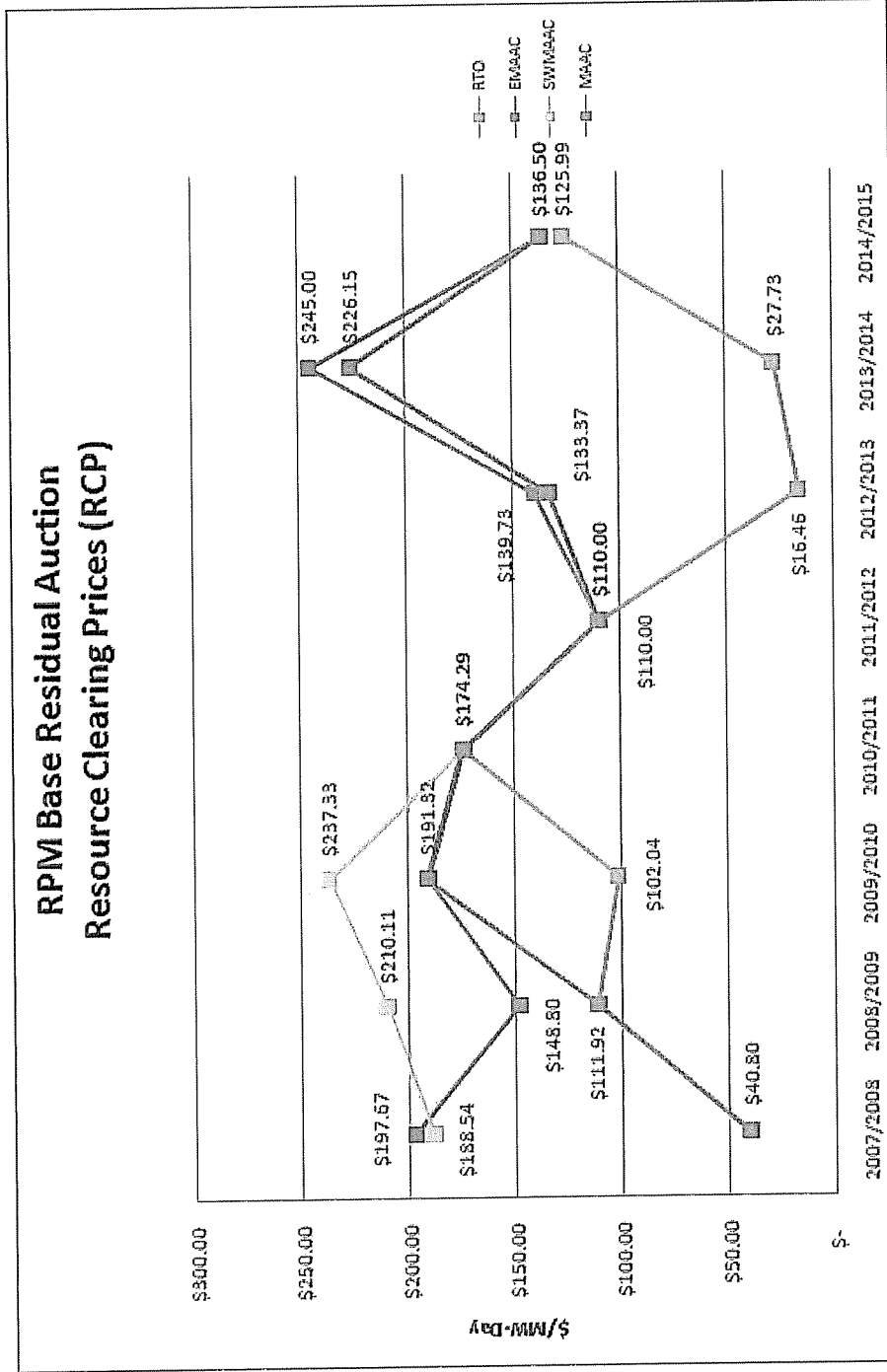
WITNESS: Scott C Weaver



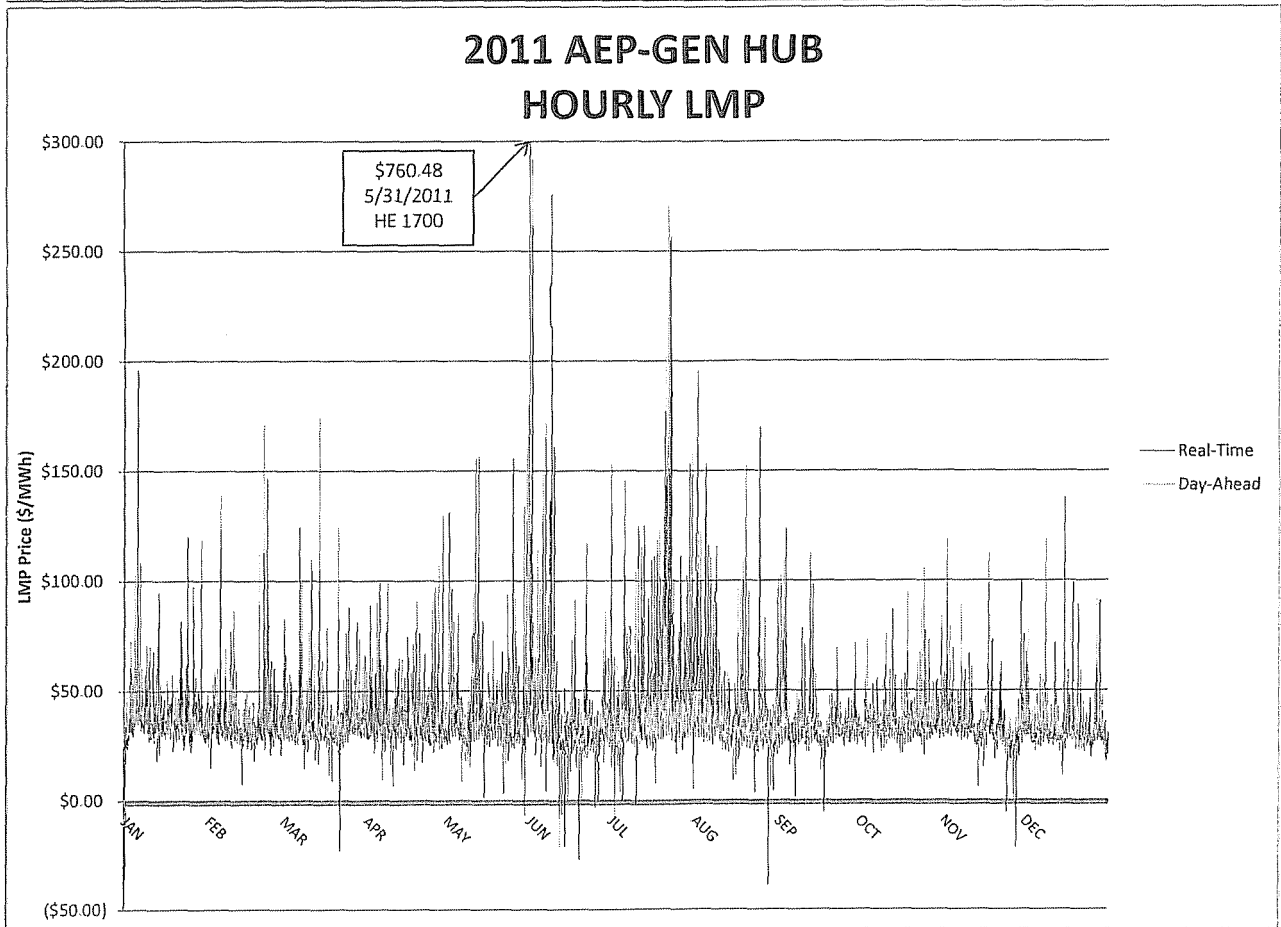
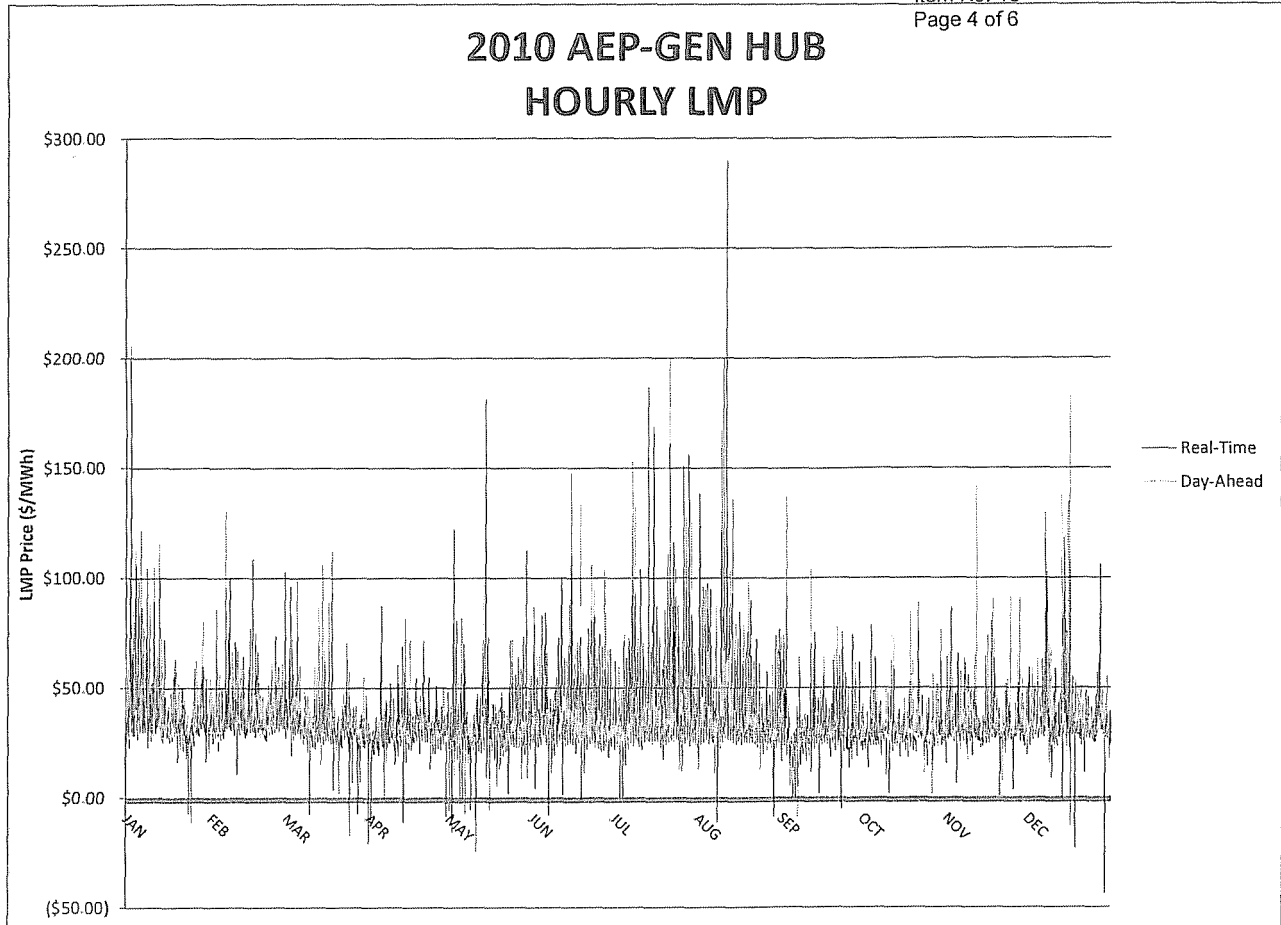
2014/2015 RPM Base Residual Auction Results

Figure 2 illustrates the trends in Resource Clearing Prices for the RTO, MAAC, EMAAC, and SWMAAC LDAs for each RPM Base Residual Auction cleared to date.

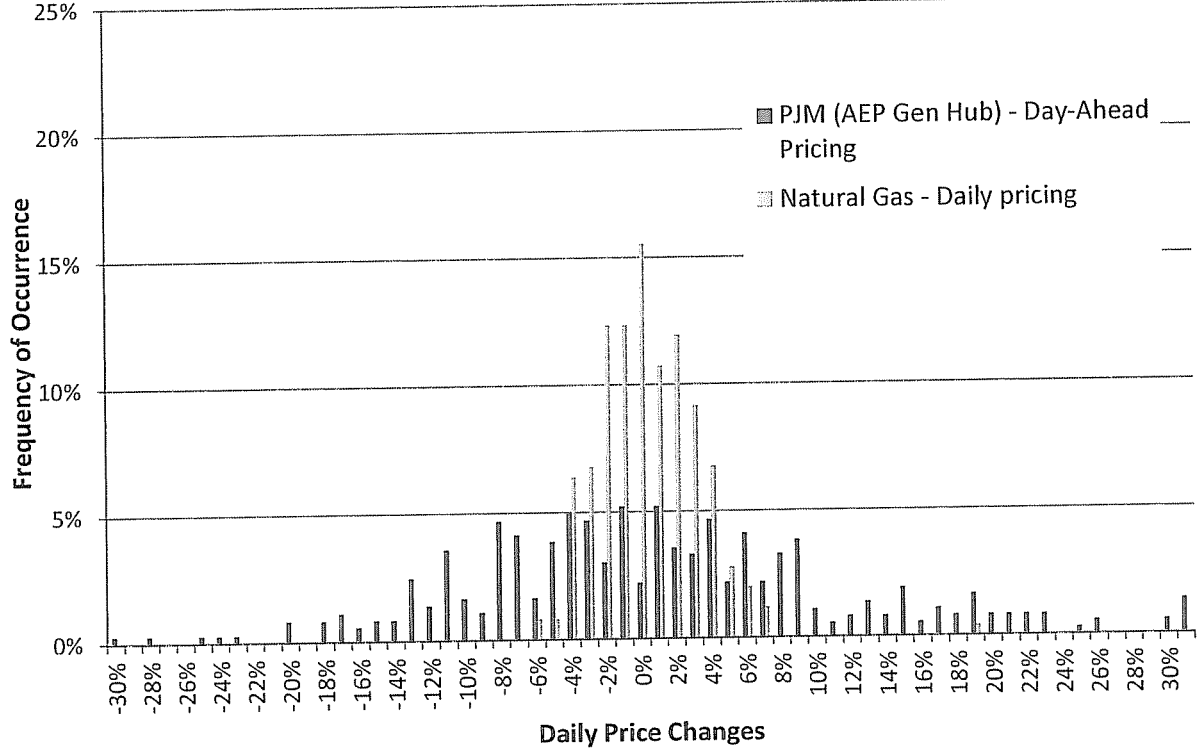
Figure 2 – Base Residual Auction Resource Clearing Prices



* RTO and MAAC Resource Clearing Prices for the 2007/2008, 2008/2009, 2010/2011, and 2011/2012 BRA are equal.

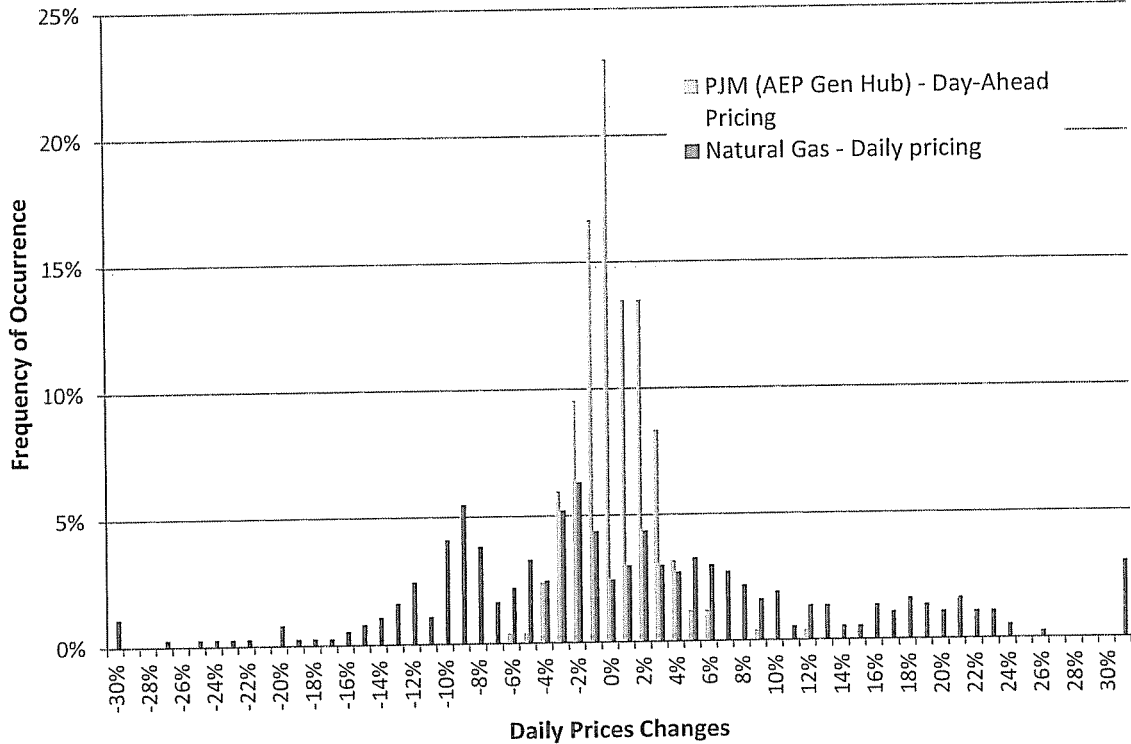


Relative Price Volatilities - 2010



Sources: PJM DA-LMP 2010; EIA (daily gas futures contract 1)

Relative Price Volatilities - 2011



Sources: PJM DA-LMP 2011; EIA (daily gas futures contract 1)

Current AEP RPM Auction Sales/Obligations

Completed Bid Auction Summary					PJM BRA Capacity Costs (\$/MW-Day)				
Seller	Market/RTO	Transaction Closed (Year)	Transaction Price (\$/MWh) *	Transaction Duration (Months)	Delivery Year	RTO	EMAAC	SWMAAC	MAAC
AEP	PJM	2006	\$ 109.76	24	2007/08	\$40.80	\$197.67	\$188.54	\$40.80
AEP	PJM	2007	\$ 62.12	3	2008/09	\$111.92	\$148.80	\$210.11	\$111.92
AEP	PJM	2007	\$ 88.24	3	2009/10	\$102.04	\$191.32	\$237.33	\$191.32
AEP	PJM	2007	\$ 91.16	3	2010/11	\$174.29	\$174.29	\$174.29	\$174.29
AEP	PJM	2007	\$ 92.42	3	2011/12	\$110.00	\$110.00	\$110.00	\$110.00
AEP	PJM	2007	\$ 98.50	3	2012/13	\$16.46	\$139.73	\$133.37	\$133.37
AEP	PJM	2008	\$ 68.33	3	2013/14	\$27.73	\$245.00	\$226.15	\$226.15
AEP	PJM	2008	\$ 95.96	3	2014/15	\$125.99	\$136.50	\$136.50	\$136.50
AEP	PJM	2008	\$ 97.39	3					
AEP	PJM	2008	\$ 100.36	3					
AEP	PJM	2008	\$ 105.44	3					
AEP	PJM	2008	\$ 105.88	3					
AEP	PJM	2008	\$ 109.34	24					
AEP	PJM	2008	\$ 114.57	3					
AEP	PJM	2008	\$ 120.76	24					
AEP	PJM	2008	\$ 126.71	3					
AEP	PJM	2008	\$ 132.69	3					
AEP	PJM	2008	\$ 133.64	3					
AEP	PJM	2008	\$ 137.36	3					
AEP	PJM	2008	\$ 149.32	3					
AEP	PJM	2009	\$ 57.95	3					
AEP	PJM	2009	\$ 64.16	3					
AEP	PJM	2009	\$ 73.98	12					
AEP	PJM	2009	\$ 76.55	12					
AEP	PJM	2009	\$ 80.66	3					
AEP	PJM	2009	\$ 82.38	12					
AEP	PJM	2009	\$ 86.78	12					
AEP	PJM	2009	\$ 88.66	3					
AEP	PJM	2010	\$ 54.10	24					
AEP	PJM	2010	\$ 54.55	12					
AEP	PJM	2010	\$ 55.24	12					
AEP	PJM	2010	\$ 56.58	36					
AEP	PJM	2010	\$ 56.69	3					
AEP	PJM	2010	\$ 62.14	3					
AEP	PJM	2010	\$ 62.85	3					
AEP	PJM	2010	\$ 63.49	3					
AEP	PJM	2010	\$ 67.55	14					
AEP	PJM	2010	\$ 71.06	17					
AEP	PJM	2010	\$ 73.68	3					
AEP	PJM	2010	\$ 73.94	3					
AEP	PJM	2010	\$ 74.67	17					
AEP	PJM	2010	\$ 76.37	12					
AEP	PJM	2010	\$ 76.72	3					
AEP	PJM	2010	\$ 77.46	3					
AEP	PJM	2010	\$ 77.55	3					
AEP	PJM	2010	\$ 78.33	11					
AEP	PJM	2010	\$ 79.60	3					
AEP	PJM	2010	\$ 86.63	3					
AEP	PJM	2010	\$ 88.44	3					
AEP	PJM	2010	\$ 91.34	24					
AEP	PJM	2011	\$ 49.72	17					
AEP	PJM	2011	\$ 51.10	29					
AEP	PJM	2011	\$ 52.80	24					
AEP	PJM	2011	\$ 54.92	24					
AEP	PJM	2011	\$ 56.13	12					
AEP	PJM	2011	\$ 57.47	36					
AEP	PJM	2011	\$ 58.74	3					
AEP	PJM	2011	\$ 60.25	3					
AEP	PJM	2011	\$ 68.54	3					
AEP	PJM	2011	\$ 70.97	12					
AEP	PJM	2011	\$ 72.04	12					
AEP	PJM	2011	\$ 75.21	3					
AEP	PJM	2011	\$ 75.68	3					
AEP	PJM	2011	\$ 76.09	3					
AEP	PJM	2011	\$ 76.58	3					
AEP	PJM	2012	\$ 44.75	24					
AEP	PJM	2012	\$ 66.64	12					

* The transaction price shown represents an All-IN Rate. In each case the capacity price used to create the All-IN Rate would have been predicated upon the specific delivery point's RPM settlement price (above) 3for the applicable delivery year

Kentucky Power Company

REQUEST

Refer to the response to Staff's First Request, Item 65. Part a. of the response states that Kentucky Power management had a "going-in desire that any long-term solution should maintain generation presence in eastern Kentucky."

- a. Explain the basis for this comment.
- b. Describe how this "desire" was incorporated into the analysis.

RESPONSE

- a. To first clarify, the response characterizes the Company's inclination as a "desire" and as a "preference." It was not intended to be, and was not, determinative of the Company's analysis. As set out in the Company's application, supporting testimony, and discovery responses, the Company's 2011 Environmental Compliance Plan, including each of its components, is a reasonable and a cost-effective means for the Company to comply with "those federal, state, or local environmental requirements which apply to coal-combustion wastes and by-products from facilities used for production of energy from coal. . . ." In addition, as further supported by the Company's filings, the DFGD scrubber and associated facilities are required by the public convenience and necessity.

Second, and more generally, the Commission itself recognized the importance of maintaining a Kentucky-based presence as recently as September, 2010 when, in connection with its review and approval and approval of a change in corporate control, it explained:

The Commission believes that this commitment [to extend the period during which Louisville & Electric Company and Kentucky Utilities Company would maintain their headquarters in Louisville and Lexington respectively] is extremely important not only to LG&E and KU ratepayers, but also to the Louisville and Lexington communities where these headquarters are located. Maintaining the LG&E and KU headquarters in Kentucky helps to ensure the utilities officers have firsthand knowledge of the rate and service issues faced by the customers they serve and makes these officers more responsive to the needs of their customers. In addition, the physical presence of these headquarters contributes to the economic vitality of the Louisville and Lexington communities.

Order, *In the Matter of: Joint Motion of PPL Corporation, E.ON AG, E.ON US Investments Corp., E.ON U.S. LLC., Louisville Gas and Electric Company, and Kentucky Utilities Company For Approval Of An Acquisition Of Ownership And Control Of Utilities*, Case No. 2010-00204 at 17 (Ky. P.S.C. September 30, 2010).

Kentucky Power recognizes that the quoted language arose in a case decided under a different subsection of KRS 278.020 than is applicable here, and involved the retention of corporate headquarter as opposed to a generating unit. But the economic impact of retaining Big Sandy Unit No. 2, as set out in the Company's testimony, certainly is of the same order of magnitude as the retention of corporate headquarters. In addition, there is room for overlap between the "public convenience and necessity" standard of KRS 278.020(1) and the "consistent with the public interest" standard of KRS 278.020(6). Certainly, under the facts of this case, the Company's expressed "preference" and "desire" is antithetical to neither KRS 278.183 nor KRS 278.020(1). To the contrary, the retention of a coal-burning facility in Eastern Kentucky is fully consistent with the General Assembly's statutorily expressed policy of "encourag[ing] the use of Kentucky coal by electric utilities serving the Commonwealth..." KRS 278.020(1), as well as its intent, in enacting KRS 278.183, "to give an incentive to use Kentucky coal which in turn would help stabilize the large coal economy for Kentucky." *Kentucky Industrial Utilities Customers, Inc. v. Kentucky Utilities Company*, 983 S.W.2d 493, 498 (Ky. 1998).

Third, retaining a generation presence in Eastern Kentucky would minimize the effect that retirement of both Big Sandy 1 and Big Sandy 2 might have grid stability, voltage support, and overall transmission reliability. The Company has no reason to believe PJM has performed such an analysis given the Company's current recommendation to retrofit and continue to operate Big Sandy 2.

- b. The preference was not an explicit input to Mr. Weaver's analysis. The four options modeled reflected the Company's judgment concerning the alternatives most likely to be the most reasonable and cost-effective means of complying with applicable environmental requirements. For example, although the first three options involved Kentucky-based generation, Option 4 did not.

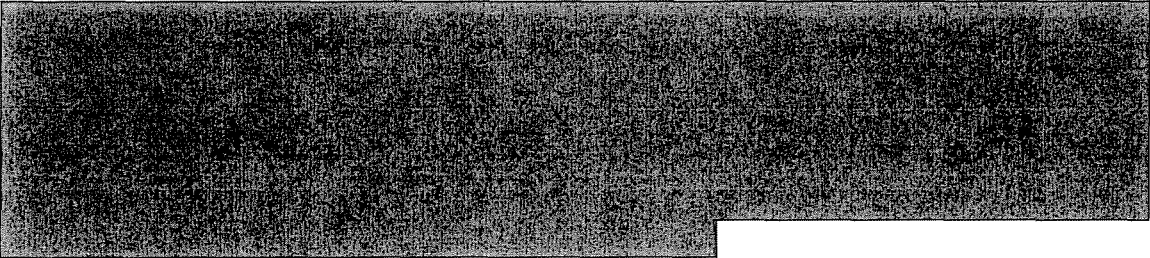
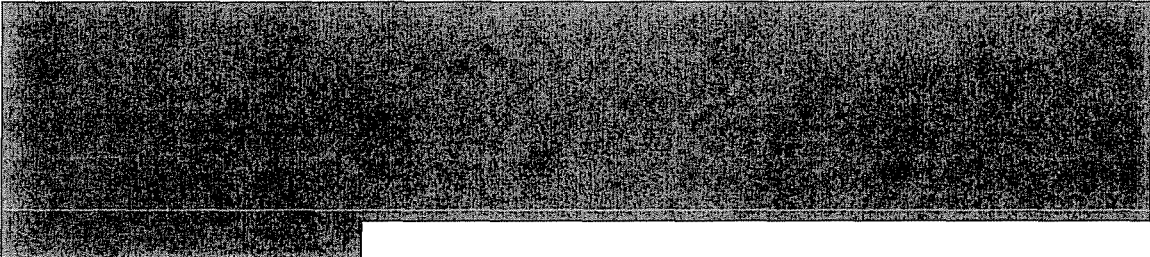
WITNESS: Ranie K Wohnhas

Kentucky Power Company

REQUEST

Refer to Staff's First Request, Item 72.c. The response refers to Kentucky Power's response to the Attorney General's ("AG") Initial Data Request, Items 22 and 23. It is not clear in those responses that the Commission's question was addressed. Also, it is not clear the responses address why AEP and/or Kentucky Power chose not to go forward with negotiations. Explain where in the responses these questions are addressed

RESPONSE



WITNESS: Ranie K Wohnhas

Kentucky Power Company

REQUEST

Refer to Kentucky Power's response to Staff's First Request, Item 81. On page 8 of the Direct Testimony of Ranie K. Wohnhas, lines 15-17, it states, "[i]n addition, the Company calculated that the gas option would have reduced payroll and property taxes respectively by \$3.2 million and \$461,000 annually." Provide Kentucky Power's estimated amount of payroll and property taxes if it had converted to the gas option.

RESPONSE

\$3.2 million in payroll taxes would be lost because the gas options would result in less jobs at the plant. The \$461,000 reduction in property taxes would result only if the Big Sandy plant no longer existed. Because a gas unit and a coal fire unit are subject to the same property tax rate, the only difference in the property taxes paid would result from a difference in the values of the respective plants. The Company has not made that calculation.

WITNESS: Ranie K. Wohnhas

Kentucky Power Company

REQUEST

Refer to Kentucky Power's response to Staff's First Request, Item 84. Provide the date this analysis was performed.

RESPONSE

The analysis was completed in March 2011.

WITNESS: Ranie K Wohnhas

Kentucky Power Company

REQUEST

Refer to Kentucky Power's response to Staff's First Request, Item 88.

- a. Using Exhibit LPM-2, page 1, column 3, provide the change in the annual revenue requirement using the 3.78 percent depreciation rate versus the 6.67 percent depreciation rate used in this proceeding.
- b. Using Exhibit LPM-2, page 1, column 3, provide the change in the annual revenue requirement assuming that the current AEP East Pool is terminated January 1, 2014 and also assuming a 3.78 percent depreciation rate.
- c. Explain why Scrubber assets at other AEP plants are depreciated over the remaining life of the plant and not 15 years.

RESPONSE

- a. The change in the annual revenue requirement using the 3.78% depreciation rate versus the 6.67% rate is estimated to be a decrease of \$19,428,368.
- b. There are no AEP East Pool charges associated with Exhibit LPM-2; therefore, the change in the revenue requirement due to the termination of the AEP East Pool and the change in the depreciation rate noted above is still estimated to be \$19,428,368.
- c. The depreciation rate used for any given plant is based on a number of factors. Without regard to other AEP plants, the depreciation rate used in this filing is based on the expected useful life of the plant in order to prevent the possibility of stranded costs.

WITNESS: Ranie K Wohnhas

Kentucky Power Company

REQUEST

Refer to Kentucky Power's response to Kentucky Industrial Utility Customer's First Set of Data Requests ("KIUC's First Request"), Item 9, concerning expected retirements of existing assets as a result of the proposed DFGD construction. The Commission has historically required the impact of any such retired assets be removed from base rates and operating expenses, disallowing future recovery of those retired assets.¹

- a. Provide the original cost and accumulated depreciation at September 30, 2009 of any utility plant equipment which is going to be retired as a result of installing new facilities proposed in this proceeding to comply with environmental requirements.
- b. Provide, by year and plant, the associated retirements for all facilities included in the monthly environmental surcharge reports for the expense months for years 2009, 2010, and 2011.

¹ Case No. 96-489, Application of Kentucky Power Company d/b/a American Electric Power to Assess a Surcharge Under KKS 278.183 to Recover Costs of Compliance with the Clean Air Act and Those Environmental Requirements Which Apply to Coal Combustion Waste and By-products (Ky. PSC Jul. 8, 1997).

RESPONSE

- a. Please see the Company's response to KPSC 2-13.
- b. Please see page 2 of this response for a list, by year and plant, the associated retirements for all facilities included in the monthly environmental surcharge report.

WITNESS: Ranie K Wohnhas

**Kentucky Power Company
Associated Plant Retirements**

Location	2009	2010	2011
Big Sandy Generating Plant	150,033	-	848,197
Cardinal Generating Plant	685,301	372,350	1,042,395
Gavin Generating Plant	8,119,934	936,544	1,359,288
John E Amos Generating Plant	30,792,475	1,550,926	1,253,986
Kammer Generating Plant	15,399	55,513	70,035
Mitchell Generating Plant	367,333	196,262	794,100
Muskingum River Generating Plant	1,152,129	1,314,843	1,376,783
Phillip Sporn Generating Plant	18,980	31,615	178,104
Rockport Generating Plant	79,795	565,500	156,514
Tanners Creek Generating Plant	509,755	139,313	344,247
Total Retirements	41,891,134	5,162,866	7,423,649

Kentucky Power Company

REQUEST

Refer to Kentucky Power's response to KIUC's First Request, Item 17. Explain whether the FERC-approved annual rate is 16.49 percent, as stated in Kentucky Power's response, or 16.44 percent (1 .37 percent X 12).

RESPONSE

Yes, the FERC-approved annual rate is 16.49% (1.374167 X 12) as provided for by Orders dated July 27, 1979 and September 24, 1979 in FERC Docket No. E-9408.

WITNESS: Ranie K. Wohnhas

Kentucky Power Company

REQUEST

Refer to Kentucky Power's response to KIUC's First Request, Item 22. Provide, in electronic format with formulas intact and unprotected, the detail, by year, for the basis the Jurisdictional Annual Revenue Increase, Percent Increase, Monthly Bill Effect with 1,000 kWh usage, and the average monthly usage for years 2012-2016.

RESPONSE

The requested documents are attached:

Attachment 1 includes all ECR projects in this filing that are expected to be in-service by 2016;

Attachment 2 includes only those projects that will be in-service by 2013; and

Attachment 3 includes only those projects that are already in-service.

Please see enclosed CD for the excel file with formulas intact, unprotected, and labeled by year to match the response to KIUC's First Request, Item 22.

WITNESS: Lila P Munsey

**Kentucky Power Company
 Pollution Control Environmental Facilities
 Big Sandy Plant
 Dry Flue Gas Desulfurization (DFGD)**

Line No. (1)	Big Sandy Unit #2 Description (2)	Dry Flue Gas Desulfurization Unit (DFGD) (3)
	In-Service Date: Second Quarter of 2016	
1	Total Capital Environmental Costs	\$ 940,300,067
2	Preliminary Scrubber Analysis 2004-2006	\$ 15,212,425
3	Capital Costs Not Associated with CAA	\$ -
4	Capital Booked in Last Base Case	<u>\$ -</u>
5	KPCo's Net In-Service Investment (L1 + L2 - L3 - L4)	<u>\$ 955,512,492</u>
6	Annual Operation Expense	\$ 46,067,000
7	Annual Maintenance Expense	<u>\$ 2,600,000</u>
8	Total Operation & Maintenance Expense	<u>\$ 48,667,000</u>

**Kentucky Power Company
 Pollution Control Environmental Facilities
 Annual Revenue Requirement
 Associated with Big Sandy Plant**

Line No. (1)	Description (2)	Capital Costs of KY Retail Revenues (3)
<u>Return on Rate Base</u>		
1	Utility Plant Installed Net (Exhibit LPM-1, L5)	\$ 955,512,492
2	Less: Accumulated Depreciation	\$ 63,732,683
3	Less: Accumulated Deferred Income Taxes	<u>\$ 23,505,607</u>
4	Net Utility Plant (L1- L2 - L3)	\$ 868,274,202
5	Annual Weighted Average Cost of Capital (Exhibit LPM-3, L5, C8)	<u>10.69%</u>
6	Annual Return on Rate Base (L4 X L5)	<u>\$ 92,818,512</u>
<u>Operating Expenses</u>		
7	Annual Depreciation (L2)	\$ 63,732,683
8	Annual Property Tax Expense (Exhibit LPM-4, L5)	\$ 1,337,670
9	Annual Non-Fuel O&M Expense (Exhibit LPM-1, L8)	<u>\$ 48,667,000</u>
10	Total Operating Expenses (L7 + L8 + L9)	\$ 113,737,353
11	Total Revenue Requirement Associated with BS Env. Facilities (L6 + L10)	\$ 206,555,865
12	Annual Revenue Allocation Factor (Exhibit LPM-5, L15, C3 or C6)	<u>78.91%</u>
13	Subtotal (L11 X L12)	\$ 162,993,233
14	KY Jurisdiction Revenue Allocation Factor (Exhibit LPM-5, L14, C3)	
15	Total KY Retail Revenue Requirement (L13 X L14)	<u>\$ 162,993,233</u>
16	KY Jurisdiction 12-month Revenue (Exhibit LPM-5, L13, C3)	\$ 569,593,245
17	Percent Change (L15 / L16)	28.62%

Kentucky Power Company
Pollution Control Environmental Facilities
Weighted Cost of Capital Calculations for August 2011

KPSC Case No. 2011-00401
Commission Staff's Second Set of Data Requests
Order Dated February 8, 2012
Item No. 23
Attachment 1
Page 3 of 15

Line No. (1)	Description (2)	Capital Balance as of April 30, 2010 ² (3)	Capital Structure (4)	Cost of Capital Rates (5)	WACC Net of Tax (6)	Gross Revenue Conversion Factor (7)	WACC Pre Tax (8)
1	Long-term Debt	\$ 550,000,000	51.941%	6.48%	3.37%		3.37%
2	Short-term Debt	\$ -	0.000%	0.83%	0.00%		0.00%
3	A/R Financing	\$ 43,588,933	4.116%	1.22%	0.05%		0.05%
4	Common Equity	\$ 465,314,088	43.943%	10.50% ¹	4.61%	1.5762 ³	7.27%
5	Total	\$ 1,058,903,021	100.000%		8.03%		10.69%

¹ Weighted Average Cost of Capital (WACC) ROR on Common Equity per Case No. 2010-00020.

² WACC Balances As of 4/30/2010 based on Case No. 2010-00318, dated September 7, 2010.

³ Gross Revenue Conversion Factor Calculations per Order in Case No. 2010-00318:

1	OPERATING REVENUE						100.0000
2	UNCOLLECTIBLE ACCOUNTS EXPENSE (0.24%)						0.2400
3	Kentucky Public Service Commission Assessment (0.15%)						0.1500
4	STATE TAXABLE PRODUCTION INCOME BEFORE 199 DEDUCTION						99.6100
5	STATE INCOME TAX EXPENSE, NET OF 199 DEDUCTION (SEE BELOW)						5.6384
6	FEDERAL TAXABLE PRODUCTION INCOME BEFORE 199 DEDUCTION						93.9716
7	199 DEDUCTION PHASE-IN						5.6372
8	FEDERAL TAXABLE PRODUCTION INCOME						88.3344
9	FEDERAL INCOME TAX EXPENSE AFTER 199 DEDUCTION (35%)						30.9171
10	AFTER-TAX PRODUCTION INCOME						57.4173
11	GROSS-UP FACTOR FOR PRODUCTION INCOME:						
12	AFTER-TAX PRODUCTION INCOME						57.4173
13	199 DEDUCTION PHASE-IN						5.6372
14	UNCOLLECTIBLE ACCOUNTS EXPENSE						0.2400
15	Kentucky Public Service Commission Assessment (0.15%)						0.1500
16	TOTAL GROSS-UP FACTOR FOR PRODUCTION INCOME (ROUNDED)						63.4445
17	BLENDED FEDERAL AND STATE TAX RATE:						
18	FEDERAL (LINE 9)						30.9171
19	STATE (LINE 5)						5.6384
20	BLENDED TAX RATE						36.5555
21	GROSS REVENUE CONVERSION FACTOR (100 / Line 16)						1.5762
	STATE INCOME TAX CALCULATION:						
1	PRE-TAX PRODUCTION INCOME						100.0000
2	COLLECTIBLE ACCOUNTS EXPENSE (0.24%)						0.2400
3	Kentucky Public Service Commission Assessment (0.15%)						0.1500
4	STATE TAXABLE PRODUCTION INCOME BEFORE 199 DEDUCTION						99.6100
5	LESS: STATE 199 DEDUCTION						5.6372
6	STATE TAXABLE PRODUCTION INCOME BEFORE 199 DEDUCTION						93.9728
7	STATE INCOME TAX RATE						6.0000
8	STATE INCOME TAX EXPENSE (LINE 6 X LINE 7)						5.6384

**Kentucky Power Company
Pollution Control Environmental Facilities
Estimated Property Taxes
Associated with Big Sandy Plant Pollution Control Facilities**

Line No. (1)	Description (2)	Installed Costs (3)
1	DFGD Installed Capital at BS#2 (LPM-2, L1, C3)	\$ 955,512,492
2	Less: Accumulated Depreciation (LPM-2, L2, C3)	<u>\$ 63,732,683</u>
3	Net Plant Investment Assessed Value (L1 - L2)	\$ 891,779,809
4	Property Tax Rate	<u>0.15%</u>
5	Increase in Property Tax (L3 X L4)	<u>\$ 1,337,670</u>

Kentucky Power Company
Pollution Control Environmental Facilities
Revenue Allocation Percentages
12-months ended August 31, 2011

Line No. (1)	Month (2)	KY Retail Jurisdiction (3)	FERC W/wholesale (4)	Total KY Full Requirement Revenues (5)=(3)+(4)	Associated Utilities (6)	Non-Associated Utilities (7)	Total Rev for Surcharge Purposes (8)=(5)+(6)+(7)
1	September 2010	\$ 40,903,323	\$ 495,401	\$ 41,398,724	\$ 6,337,586	\$ 5,270,698	\$ 53,007,008
2	October 2010	\$ 39,106,852	\$ 386,166	\$ 39,493,018	\$ 6,800,222	\$ 4,192,455	\$ 50,485,695
3	November 2010	\$ 40,488,923	\$ 410,737	\$ 40,899,660	\$ 4,661,941	\$ 3,884,802	\$ 49,446,403
4	December 2010	\$ 56,106,329	\$ 639,267	\$ 56,745,596	\$ 2,533,257	\$ 5,561,003	\$ 64,839,856
5	January 2011	\$ 65,952,346	\$ 603,837	\$ 66,556,183	\$ 5,085,114	\$ 6,199,202	\$ 77,840,499
6	February 2011	\$ 58,755,458	\$ 529,203	\$ 59,284,661	\$ 4,720,801	\$ 5,024,766	\$ 69,030,228
7	March 2011	\$ 44,307,469	\$ 459,737	\$ 44,767,206	\$ 5,691,192	\$ 5,445,168	\$ 55,903,566
8	April 2011	\$ 42,540,201	\$ 427,836	\$ 42,968,037	\$ 4,530,299	\$ 6,578,375	\$ 54,076,711
9	May 2011	\$ 40,424,987	\$ 784,420	\$ 41,209,407	\$ 6,373,043	\$ 4,536,768	\$ 52,119,218
10	June 2011	\$ 46,953,714	\$ 462,091	\$ 47,415,805	\$ 6,987,065	\$ 10,149,681	\$ 64,552,551
11	July 2011	\$ 46,534,433	\$ 530,987	\$ 47,065,420	\$ 8,031,761	\$ 13,076,250	\$ 68,173,431
12	August 2011	\$ 47,519,210	\$ 525,287	\$ 48,044,497	\$ 5,676,708	\$ 8,673,690	\$ 62,394,895
13	12-month Total	\$ 569,593,245	\$ 6,254,969	\$ 575,848,214	\$ 67,428,989	\$ 78,592,858	\$ 721,870,061
14	Rev. Alloc. %s	98.91%	1.09%	100.00%	9.34%	10.88%	100.00%
15	Rev. Alloc. %s	78.91%	0.87%				

Kentucky Power Company
 Pollution Control Environmental Facilities
 AEP Pool Surplus Companies
 Net Investment in
 Environmental Facilities

Line No. (1)	Generating Unit (2)	Description of Environmental Facilities (3)	In-Service Date (4)	Cost of Environmental Facilities (5)	Less Original Facility Cost in Base Rates (6)	OPCo or I&M Percentage (7)	I&M's Environmental Investment (8)=[(5)-(6)]x(7)	OPCo's Environmental Investment (9)=[(5)-(6)]x(7)
Surplus Companies								
1	Amos Unit-3	Dry Fly Ash Disposal Conversion	8/3/2010	\$ 58,717,352	\$ -	66.67%	\$ -	\$ 39,146,859
2	Amos Common	Hg In-Pond Chemical Treatment	7/15/2011	\$ 2,484,972	\$ -	29.89%	\$ -	\$ 742,758
3	Amos Common	FGD Hg Waste Water Treatment	4th Qtr 2012	\$ 12,827,197	\$ -	29.89%	\$ -	\$ 3,834,049
4	Amos Common	Ash Pond Discharge Diffuser	4th Qtr 2012	\$ 2,447,711	\$ -	29.89%	\$ -	\$ 731,621
5	Amos Subtotal	Sum of Lines 1 to 4		\$ 76,477,232	\$ -		\$ -	\$ 44,455,287
6	Rockport Units 1 & 2	Activated Carbon Injection (ACI)	9/28/2009	\$ 23,405,482	\$ -	85%	\$ 19,894,660	
7	Tanners Creek Units 1, 2, & 3	Selective Non-Catalytic Reduction (SNCR) System	12/11/2009	\$ 14,152,243	\$ -	100%	\$ 14,152,243	\$ -
8	Total Surplus Companies	L5 + L6 + L7		\$ 114,034,957	\$ -		\$ 34,046,903	\$ 44,455,287

Kentucky Power Company
 Pollution Control Environmental Facilities
 AEP System Pool
 Capacity Equalization Settlement for
 August 2011

Calculation of Member Capacity Surplus / (Deficit) (kW)

Line No.	Generating Company	Internal (MLR) Max 60-Minute Integrated Demand in 12 ME 8/31/11 (MW)		Member Load Ratio	Member Primary Capacity (kW)	Primary Capacity Reservation (kW)	Capacity Surplus (Deficit) (kW)
		(3)	(4)				
(1)	(2)			(4)	(5)	(6)=Total kW x (4)	(7)=(5)-(6)
1	APCo	7,542	31.181%	6,377,000	8,293,500	(1,916,500)	
2	KPCo	1,596	6.598%	1,471,000	1,754,900	(283,900)	
3	I&M	4,837	19.998%	5,428,000	5,319,100	108,900	
4	OPCo	5,544	22.920%	8,465,000	6,096,300	2,368,700	
5	CSP	4,669	19.303%	4,857,000	5,134,200	(277,200)	
6	Total	24,188	100.000%	26,598,000	26,598,000	-	

Calculation of Member Capacity Settlement

Generating Company	Capacity Surplus (Deficit) (kW)	Capacity Rate (\$/kW)	Estimated Credit (Charge) (\$)
(2)	(7)=(5)-(6)		
7 APCo	(1,916,500)	\$13.60	(26,070,502)
8 KPCo	(283,900)	\$13.60	(3,861,944)
9 I&M	108,900	\$14.76	1,607,364
10 OPCo	2,368,700	\$13.55	32,095,885
11 CSP	(277,200)	\$13.60	(3,770,803)
12 Total	-		\$ -

Equalization capacity rate (The is the average \$/kW rate paid by deficit members.): **13.6032**

Kentucky Power Company
 Pollution Control Environmental Facilities
 AEP System Pool
 Capacity Rate Calculations for
 Surplus Member Companies
 August 2011

<u>Line No.</u>	<u>Description</u>	<u>Formula</u>	<u>Units</u>	<u>I&M</u>	<u>OPCo</u>
(1)	(2)	(3)	(4)	(5)	(6)
	<u>Primary Capacity Investment Rate:</u>				
1	Steam Production Plant as of 12-mo ended 12/31/10		(\$)	4,040,461,038	6,654,950,782
2	Steam Capacity as of 12-mo ended 12/31/10		(kW)	<u>5,414,000</u>	<u>8,440,000</u>
3	Average Cost of Investment	L1 / L2	(\$/kW)	\$746.30	\$788.50
4	Carrying Charge (16.44% / 12 months)		(\$/kW/Month)	<u>0.0137</u>	<u>0.0137</u>
5	Primary Capacity Investment Rate	L3 X L4		\$10.22	\$10.80
	<u>Monthly Fixed Operating Rate:</u>				
6	Steam Plant Operation Expense (less: fuel)		(\$)	18,440,310	17,311,512
7	1/2 Maintenance Expense		(\$)	<u>6,117,393</u>	<u>5,856,913</u>
8	Subtotal - Fixed Operating Expense	L6 + L7	(\$)	24,557,703	23,168,425
9	Steam Capability	L2	(kW)	<u>5,414,000</u>	<u>8,440,000</u>
10	Fixed Operating Rate	L8 / L9	(\$/kW)	\$4.54	\$2.75
11	Capacity Rate	L5 + L10	(\$/kW)	<u>\$14.76</u>	<u>\$13.55</u>
	<u>Calculate AEP Pool Average Capacity Rate:</u>				
12	Surplus Capacity	Exhibit LPM-7, C7, L3 or L4	(kW)	108,900	2,368,700
13	Member's Percent of Pool's Total Surplus		(%)	4.40%	95.60%
14	Surplus Member's Capacity Rate	L11	(\$/kW)	\$14.76	\$13.55
15	Surpl. Memb. CAP Rate Recv. From Deficit Memb.	L13 X L14	(\$/kW)	<u>\$0.65</u>	<u>\$12.95</u>
16	AEP Pool's Average Capacity Rate		(\$/kW)		<u>\$13.60</u>

**Kentucky Power Company
 Pollution Control Environmental Facilities
 AEP System Pool Monthly
 Environmental Capacity Costs**

Line No.	Description	Exhibit or Formula	I&M (4)	OPCo (5)	KPCo (6)
(1)	(2)	(3)	(4)	(5)	(6)
1	Net Cost of Environmental Facilities Investment Installed	Exhibit LPM-6, L8	\$ 34,046,903	\$ 44,455,287	
2	Installed Capacity (kW)	Exhibit LPM-8, L2	<u>5,414,000</u>	<u>8,440,000</u>	
3	Weighted Average Installed Cost (\$/kW)	L1 / L2	\$6.29	\$5.27	
4	Monthly Return on Investment	Exhibit LPM-8, L4	<u>0.0137</u>	<u>0.0137</u>	
5	Envir. Member Capacity Investment Rate (\$/kW/Mo.)	L3 X L4	\$0.09	\$0.07	
	Plus: Operations & 1/2 Maintenance				
6	OPCo's Amos Unit No. 3 & Common Plant	Exhibit LPM-10, L21, C14		<u>\$0.01</u>	
7	I&M's: Rockport & Tanners Creek Units	Exhibit LPM-11, L15, C14	<u>\$0.06</u>		
8	Subtotal	L5 + L6 + L7	\$0.15	\$0.08	
9	Surplus Company Weighting	Exhibit LPM-8, L13	<u>4.40%</u>	<u>95.60%</u>	
10	Surplus Capacity	L8 X L9	\$0.01	\$0.08	\$0.09
11	KPCo's Pool Capacity Deficit	Exhibit LPM-7, L2, C7	<u>283,900</u>	<u>283,900</u>	<u>283,900</u>
12	KPCo's Monthly Envir. Pool Capacity Charge	L10 X L11	\$ 2,839	\$ 22,712	\$ 25,551
13	Number of months				<u>12</u>
14	Annual Effect of Envir. Pool Capacity Charge	L12 X L13			<u>\$ 306,612</u>

Kentucky Power Company
 Pollution Control Environmental Facilities
 Ohio Power Company

Line No.	Description	Month 1 (3)	Month 2 (4)	Month 3 (5)	Month 4 (6)	Month 5 (7)	Month 6 (8)	Month 7 (9)	Month 8 (10)	Month 9 (11)	Month 10 (12)	Month 11 (13)	Month 12 (14)	Annual (15)
(1)	Operations:													
1	Amos Unit #3 Dry Fly Ash Disposal Conversion	\$ 3,042	\$ 3,042	\$ 3,041	\$ 3,042	\$ 3,042	\$ 3,041	\$ 3,042	\$ 3,042	\$ 3,041	\$ 3,042	\$ 3,042	\$ 3,041	\$36,500.00
2	Amos Common - FGD Hg Waste Water Treatment	\$ 86,125	\$ 86,125	\$ 86,125	\$ 86,125	\$ 86,125	\$ 86,125	\$ 86,125	\$ 86,125	\$ 86,125	\$ 86,125	\$ 86,125	\$ 86,125	\$1,033,500.00
3	Amos Common - Hg In-Pond Chemical Treatment	\$ 138,125	\$ 138,125	\$ 138,125	\$ 138,125	\$ 138,125	\$ 138,125	\$ 138,125	\$ 138,125	\$ 138,125	\$ 138,125	\$ 138,125	\$ 138,125	\$1,657,500.00
4	Amos Common - Ash Pond Discharge Diffuser	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$0.00
5	Total Common Plant Operations (L2 + L3 + L4)	\$ 224,250	\$ 224,250	\$ 224,250	\$ 224,250	\$ 224,250	\$ 224,250	\$ 224,250	\$ 224,250	\$ 224,250	\$ 224,250	\$ 224,250	\$ 224,250	\$2,691,000.00
	Maintenance:													
6	Amos Unit #3 Dry Fly Ash Disposal Conversion	\$ 3,042	\$ 3,042	\$ 2,867	\$ 762	\$ 20,802	\$ 1,706	\$ 4,042	\$ 3,896	\$ (4,704)	\$ 22,701	\$ 4,431	\$ 877	\$63,463.44
7	1/2 Amos Unit #3 Maintenance (L6 / 2)	\$ 1,521	\$ 1,521	\$ 1,433	\$ 381	\$ 10,401	\$ 853	\$ 2,021	\$ 1,948	\$ (2,352)	\$ 11,350	\$ 2,216	\$ 439	\$31,732.00
8	Amos Common - FGD Hg Waste Water Treatment	\$ 2,208	\$ 2,208	\$ 2,208	\$ 2,208	\$ 2,208	\$ 2,209	\$ 2,208	\$ 2,208	\$ 2,209	\$ 2,208	\$ 2,208	\$ 2,209	\$26,500.00
9	Amos Common - Hg In-Pond Chemical Treatment	\$ 3,542	\$ 3,542	\$ 3,541	\$ 3,542	\$ 3,542	\$ 3,541	\$ 3,542	\$ 3,542	\$ 3,541	\$ 3,542	\$ 3,542	\$ 3,541	\$42,500.00
10	Amos Common - Ash Pond Discharge Diffuser	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$0.00
11	Total Common Plant Maintenance (L8 + L9 + L10)	\$ 5,750	\$ 10,313	\$ 10,050	\$ 6,893	\$ 36,953	\$ 8,309	\$ 11,813	\$ 11,594	\$ (1,306)	\$ 39,801	\$ 12,397	\$ 7,066	\$159,632.44
12	1/2 Common Plant Maintenance (L11 / 2)	\$ 2,875	\$ 5,157	\$ 5,025	\$ 3,446	\$ 18,477	\$ 4,154	\$ 5,906	\$ 5,797	\$ (653)	\$ 19,900	\$ 6,199	\$ 3,533	\$79,816.00
13	Total Amos Unit #3 Fixed O&M (L1 + L7)	\$ 4,563	\$ 4,563	\$ 4,474	\$ 3,423	\$ 13,443	\$ 3,894	\$ 5,063	\$ 4,990	\$ 689	\$ 14,392	\$ 5,258	\$ 3,480	\$68,232.00
14	OPCo's % Ownership (Exh. LPM-6, L1, C7)	66.67%	66.67%	66.67%	66.67%	66.67%	66.67%	66.67%	66.67%	66.67%	66.67%	66.67%	66.67%	66.67%
15	OPCo's Share of Amos #3 Fixed O&M (L13 X L14)	\$ 3,042	\$ 3,042	\$ 2,983	\$ 2,282	\$ 8,962	\$ 2,596	\$ 3,376	\$ 3,327	\$ 459	\$ 9,595	\$ 3,506	\$ 2,320	\$45,490.00
16	Total Amos Common Plant Fixed O&M (L5 + L12)	\$ 227,125	\$ 229,407	\$ 229,275	\$ 227,696	\$ 242,727	\$ 228,404	\$ 230,156	\$ 230,047	\$ 223,597	\$ 244,150	\$ 230,449	\$ 227,783	\$2,770,816.00
17	OPCo's % Ownership (Exh. LPM-6, L2, C7)	29.89%	29.89%	29.89%	29.89%	29.89%	29.89%	29.89%	29.89%	29.89%	29.89%	29.89%	29.89%	29.89%
18	OPCo's Share of Common PI Fixed O&M (L16 X L17)	\$ 67,888	\$ 68,570	\$ 68,530	\$ 68,058	\$ 72,551	\$ 68,270	\$ 68,794	\$ 68,761	\$ 66,833	\$ 72,976	\$ 68,881	\$ 69,084	\$828,196.00
19	OPCo's Share of Fixed O&M (L15 + L18)	\$ 70,930	\$ 71,612	\$ 71,513	\$ 70,340	\$ 81,513	\$ 70,866	\$ 72,170	\$ 72,068	\$ 67,292	\$ 82,571	\$ 72,387	\$ 70,404	\$873,686.00
20	OPCo Steam Capacity (kW) (Exh. LPM-9, L2, C5)	8,440,000	8,440,000	8,440,000	8,440,000	8,440,000	8,440,000	8,440,000	8,440,000	8,440,000	8,440,000	8,440,000	8,440,000	8,440,000
21	OPCo Rate (\$/kW) (L19 / L20)	\$0.01	\$0.01	\$0.01	\$0.01	\$0.01	\$0.01	\$0.01	\$0.01	\$0.01	\$0.01	\$0.01	\$0.01	\$0.01
22	OPCo Surplus Weighting (%) (Exh. LPM-9, L9, C5)	95.60%	95.60%	95.60%	95.60%	95.60%	95.60%	95.60%	95.60%	95.60%	95.60%	95.60%	95.60%	95.60%
23	Effect on Wt. Ave. Rate (\$/kW) (L21 X L22)	\$0.01	\$0.01	\$0.01	\$0.01	\$0.01	\$0.01	\$0.01	\$0.01	\$0.01	\$0.01	\$0.01	\$0.01	\$0.01
24	Portion of Weighted Average Capacity Rate													
25	Attributed to OPCo Facilities (L23)	\$0.01	\$0.01	\$0.01	\$0.01	\$0.01	\$0.01	\$0.01	\$0.01	\$0.01	\$0.01	\$0.01	\$0.01	\$0.01
26	KPCo's Pool Capacity Deficit (Exh. LPM-7, L2, C7)	283,900	283,900	283,900	283,900	283,900	283,900	283,900	283,900	283,900	283,900	283,900	283,900	283,900
26	KPCo's Share of OPCo (L24 X L25)	\$ 2,839	\$ 2,839	\$ 2,839	\$ 2,839	\$ 2,839	\$ 2,839	\$ 2,839	\$ 2,839	\$ 2,839	\$ 2,839	\$ 2,839	\$ 2,839	\$34,068

Kentucky Power Company
 Pollution Control Environmental Facilities
 Indiana and Michigan Power Company

Line No. (1)	Description (2)	Month 1 (3)	Month 2 (4)	Month 3 (5)	Month 4 (6)	Month 5 (7)	Month 6 (8)	Month 7 (9)	Month 8 (10)	Month 9 (11)	Month 10 (12)	Month 11 (13)	Month 12 (14)	Total (15)
Operations:														
1	Rxp11&2 Activated Carbon Injection (ACI)	\$ 471,649	\$ 613,139	\$ 463,686	\$ 536,123	\$ 448,647	\$ 290,791	\$ 288,112	\$ 165,345	\$ 30,592	\$ 165,068	\$ 134,893	\$ 379,076	\$3,987,119.48
2	TC 1, 2, & 3 Selective Non-Catalytic Reduction (SNCR)	\$ 1,235	\$ 26	\$ (392)	\$ (32)	\$ 5	\$ 8	\$ (16)	\$ 20	\$ 26	\$ (43)	\$ 2	\$ 107	\$945.14
Maintenance:														
3	Rxp11&2 Activated Carbon Injection (ACI)	\$ 2,314	\$ -	\$ 558	\$ 1,349	\$ 650	\$ -	\$ -	\$ 4,047	\$ 8,642	\$ 32,485	\$ 23,769	\$ 279	\$74,093.50
4	1/2 Rockport Maintenance (L3 / 2)	\$ 1,157	\$ -	\$ 279	\$ 675	\$ 325	\$ -	\$ -	\$ 2,024	\$ 4,321	\$ 16,243	\$ 11,884	\$ 139	\$37,047.00
5	TC 1, 2, & 3 Selective Non-Catalytic Reduction (SNCR)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$0
6	1/2 Tanners Creek Maintenance (L5 / 2)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$0
7	Total Rockport Fixed O&M (L1 + L4)	\$ 472,806	\$ 613,139	\$ 463,965	\$ 535,798	\$ 448,972	\$ 290,791	\$ 288,112	\$ 167,369	\$ 34,913	\$ 181,311	\$ 146,777	\$ 379,215	\$4,024,166.48
8	I&M's Percentage Ownership (Exh. LPM-6, L6, C7;	85.00%	85.00%	85.00%	85.00%	85.00%	85.00%	85.00%	85.00%	85.00%	85.00%	85.00%	85.00%	85.00%
9	I&M's Share of Rockport Fixed O&M (L7 X L8)	\$ 401,885	\$ 521,168	\$ 394,370	\$ 456,278	\$ 381,626	\$ 247,172	\$ 244,895	\$ 142,264	\$ 29,676	\$ 154,114	\$ 124,761	\$ 322,333	\$3,420,542.00
10	Total Tanners Creek Fixed O&M (L2 + L6)	\$ 1,235	\$ 26	\$ (392)	\$ (32)	\$ 5	\$ 8	\$ (16)	\$ 20	\$ 26	\$ (43)	\$ 2	\$ 107	\$945.14
11	I&M's Percentage Ownership (Exh. LPM-6, L7, C7;	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%
12	I&M's Share of TC Fixed O&M (L10 X L11)	\$ 1,235	\$ 26	\$ (392)	\$ (32)	\$ 5	\$ 8	\$ (16)	\$ 20	\$ 26	\$ (43)	\$ 2	\$ 107	\$945.14
13	I&M's Share of Fixed O&M (L9 + L12)	\$ 403,120	\$ 521,194	\$ 393,978	\$ 456,246	\$ 381,631	\$ 247,180	\$ 244,879	\$ 142,284	\$ 29,702	\$ 154,071	\$ 124,763	\$ 322,440	\$3,421,488.00
14	I&M Steam Capacity (KW) (Exh. LPM-9, L2, C4)	5,414,000	5,414,000	5,414,000	5,414,000	5,414,000	5,414,000	5,414,000	5,414,000	5,414,000	5,414,000	5,414,000	5,414,000	5,414,000
15	Indiana Rate (\$/KW) (L13 / L14)	\$0.07	\$0.10	\$0.07	\$0.08	\$0.07	\$0.05	\$0.05	\$0.03	\$0.01	\$0.03	\$0.02	\$0.06	\$0.06
16	I&M Surplus Weighting (%) (Exh. LPM-9, L9, C4)	4.40%	4.40%	4.40%	4.40%	4.40%	4.40%	4.40%	4.40%	4.40%	4.40%	4.40%	4.40%	4.40%
17	Effect on Wt. Ave. Rate (\$/KW) (L15 X L16)	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
18	Portion of Weighted Average Capacity Rate	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
19	Attributed to I&M Environmental Controls	283,900	283,900	283,900	283,900	283,900	283,900	283,900	283,900	283,900	283,900	283,900	283,900	283,900
20	KPCo's Pool Capacity Deficit (Exh. LPM-7, L2, C7;	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
20	KPCo's Share: ACI & SNCR (L18 X L19)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -

**Kentucky Power Company
 Pollution Control Environmental Facilities
 Rockport Environmental Surcharge Calculations
 Revenue Requirement**

<u>Line No.</u>	<u>Cost Component</u>	<u>Formula</u>	<u>Rockport Total</u>
(1)	(2)	(3)	(4)
1	Rockport #1 & #2 Activated Carbon Injection (ACI)	Exhibit LPM-6, L6, C5	\$23,405,482
2	Less: Accumulated Depreciation	L1 X 3.52%	\$823,873
3	Less: Accumulated Deferred Income Tax	L1 X 1.3%	<u>\$304,271</u>
4	Total Rate Base	L1 - L2 - L3	\$22,277,338
5	Weighted Average Cost of Capital for Aug. 2011	Exhibit LPM-3, L5, C8	10.69%
6	Monthly Weighted Average Cost of Capital	L5 / 12	<u>0.8908%</u>
7	Monthly Return on Rate Base	L4 X L6	\$198,447
<u>Operating Expenses</u>			
8	Monthly Depreciation Expense	L2 / 12	<u>\$68,656</u>
9	Total Operating Expense		\$68,656
10	Total Revenue Requirement Associated with Rockport ACI	L7 + L9	\$267,103
11	KPCo's Percentage of Rockport's upgrades	100% - Exhibit LPM-6, L6, C7	15%
12	KPCo's Portion of Rockport's upgrades	L10 X L11	\$40,065
13	Annualize		<u>12</u>
14	Annualized Revenue Requirement	L12 X L13	<u>\$ 480,780</u>

**Kentucky Power Company
Pollution Control Environmental Facilities
New Environmental Costs Associated with
Allowance Inventory**

<u>Line No.</u>	<u>Description</u>	<u>Formula</u>	<u>KY Retail Rev Requirement</u>
(1)	(2)	(3)	(4)
1	Estimated Monthly CSAPR SO2 Allowance Inventory	KIUC 1-20	\$ 425,976
2	Estimated Monthly CSAPR NOx Allowance Inventory	KIUC 1-20	\$ 2,053
3	Estimated Monthly CSAPR SO2 Consumption Expense	L11 / 12	\$ 517,667
4	Estimated Monthly CSAPR NOx Consumption Expense	L12 / 12	<u>\$ (54,167)</u>
5	Net Monthly Expenses (Consumption less Gains)	L3 + L4	\$ 463,500
6	Cash Working Capital Allowance (in accordance with ES FORM 3.13)	L5 / 8	<u>\$ 57,938</u>
7	Total Rate Base	L1 + L2 + L6	\$ 485,967
8	Annual Weighted Average Cost of Capital	Exhibit LPM-3, L5, C8	<u>10.69%</u>
9	Return of Rate Base	L7 X L8	\$ 51,950
10	Estimated Monthly CSAPR SO2 Consumption Expense	Wohnhas testimony	\$ 6,212,000
11	Estimated Monthly CSAPR NOx Consumption Expense	Wohnhas testimony	<u>\$ (650,000)</u>
12	Total Operating Expenses	L10 + L11	\$ 5,562,000
13	Total Revenue Requirement	L9 + L12	\$ 5,613,950
14	Annual Revenue Allocation Factor	Exhibit LPM-5, L15, C3	<u>78.91%</u>
15	Subtotal	L13 X L14	\$ 4,429,968
16	KY Jurisdiction Revenue Allocation Factor	Exhibit LPM-5, L14, C3	<u>98.91%</u>
17	Total KY Retail Revenue Requirement	L15 X L16	<u>\$ 4,381,681</u>
18	KY Jurisdiction 12-month Revenue	Exhibit LPM-5, L13, C3	\$ 569,593,245
19	Percent Change	L17 / L18	<u>0.77%</u>

Kentucky Power Company
Pollution Control Environmental Facilities
New Environmental Costs
Effect on Residential Customers

<u>Line No.</u>	<u>Description</u>	<u>Formula</u>	<u>Annual Amount</u>	<u>Percent Increase</u>
(1)	(2)	(3)	(5)	(6)
1	Annual Effect of New Environmental Pool Capacity Charges	Exhibit LPM-9, L14	\$306,612	
2	KPCo's Share of Rockport	Exhibit LPM-12, L14	<u>\$480,780</u>	
3	Total Environmental Cost	L1 + L2	\$787,392	
4	KPCo's Average Retail Allocation for 12 months ended August 2011	Exhibit LPM-5, L.15, C3	<u>78.91%</u>	
5	Net Annual Impact on the Kentucky Retail Customers	L3 X L4	\$621,331	0.10%
6	KY Retail Allowances	Exhibit LPM-13, L17, C4	\$4,381,681	0.77%
7	KY Retail Revenue Requirement for Big Sandy Environmental Additions	Exhibit LPM-2, L15, C3	<u>\$162,993,233</u>	<u>28.62%</u>
8	Total Environmental Projects in this Filing	L5 + L6 + L7	\$167,996,245	29.49%
9	Billed Revenues for 12 months ended August 2011	Exhibit LPM-5, L13, C3	<u>\$569,593,245</u>	
10	Percent Increase	L8 / L9	29.49%	
		Usage in kWh:	<u>1,000</u>	
11	Monthly Effect on a Residential Customers		\$ 28.88	
12	Annualize		<u>12</u>	
13	Annual Effect on a Residential Customers	L11 X L12	<u>\$ 346.56</u>	

Kentucky Power Company
 New Environmental Costs
 Effect on Residential Customer

Typical Residential Bill - computed on average monthly kWh usage of:		1,000 kWh		Monthly	Annual
	Rate	Now	If Approved	Increase	Increase
Service Charge (\$/customer)	\$8.00	\$ 8.00	\$ 8.00		
Energy Usage (\$/kWh)	\$0.0859	\$ 85.90	\$ 85.90		
Fuel Adjustment Charge for August 2011 (\$/kWh)	(\$0.0006513)	\$ (0.65)	\$ (0.65)		
Capacity Charge (\$/kWh)	\$0.00097	\$ 0.97	\$ 0.97		
Demand-side Management (\$/kWh)	\$0.000774	\$ 0.77	\$ 0.77		
Home Energy Assistance Program (\$/customer)		\$ 0.15	\$ 0.15		
Subtotal 1		\$ 95.14	\$ 95.14		
Environmental Surcharge for August 2011 (Subtotal 1 x rate)	2.9277%	\$ 2.79	\$ 33.54	\$ 30.75	
Subtotal 2		\$ 97.93	\$ 128.68		
Monthly effect on a Residential Customer				\$ 30.75	\$ 369.00
Percent Increase (As Filed)					31.40%
Subtotal 1		\$ 95.14	\$ 95.14		
Environmental Surcharge for August 2011 (Subtotal 1 x rate)	2.9277%	\$ 2.79	\$ 31.67	\$ 28.88	
Subtotal 2		\$ 97.93	\$ 126.81		
Monthly effect on a Residential Customer				\$ 28.88	\$ 346.56
Percent Increase (Revised)					29.49%

Typical Residential Bill - computed on average monthly kWh usage of:		1,376 kWh		Monthly	Annual
	Rate	Now	If Approved	Increase	Increase
Service Charge (\$/customer)	\$8.00	\$ 8.00	\$ 8.00		
Energy Usage (\$/kWh)	\$0.0859	\$ 118.20	\$ 118.20		
Fuel Adjustment Charge for August 2011 (\$/kWh)	(\$0.0006513)	\$ (0.90)	\$ (0.90)		
Capacity Charge (\$/kWh)	\$0.00097	\$ 1.33	\$ 1.33		
Demand-side Management (\$/kWh)	\$0.000774	\$ 1.07	\$ 1.07		
Home Energy Assistance Program (\$/customer)		\$ 0.15	\$ 0.15		
Subtotal 1		\$ 127.85	\$ 127.85		
Environmental Surcharge for August 2011 (Subtotal 1 x rate)	2.9277%	\$ 3.74	\$ 45.06	\$ 41.32	
Subtotal 2		\$ 131.59	\$ 172.91		
Monthly effect on a Residential Customer				\$ 41.32	\$ 495.84
Percent Increase (As Filed)					31.40%
Subtotal 1		\$ 127.85	\$ 127.85		
Environmental Surcharge for August 2011 (Subtotal 1 x rate)	2.9277%	\$ 3.74	\$ 42.55	\$ 38.81	
Subtotal 2		\$ 131.59	\$ 170.40		
Monthly effect on a Residential Customer				\$ 38.81	\$ 465.72
Percent Increase					29.49%

Big Sandy Capital in \$Ms	\$ 956
Rockport Capital in \$Ms	\$ 23
Amos & Tanners Creek Pool Capital in \$Ms	\$ 91
	\$ 1,070

**Kentucky Power Company
 Pollution Control Environmental Facilities
 Big Sandy Plant
 Dry Flue Gas Desulfurization (DFGD)**

Line No. (1)	Big Sandy Unit #2 Description (2)	Dry Flue Gas Desulfurization Unit (DFGD) (3)
	In-Service Date: Second Quarter of 2016	
1	Total Capital Environmental Costs	\$ -
2	Preliminary Scrubber Analysis 2004-2006	\$ -
3	Capital Costs Not Associated with CAA	\$ -
4	Capital Booked in Last Base Case	<u>\$ -</u>
5	KPCo's Net In-Service Investment (L1 + L2 - L3 - L4)	<u>\$ -</u>
6	Annual Operation Expense	\$ -
7	Annual Maintenance Expense	<u>\$ -</u>
8	Total Operation & Maintenance Expense	<u>\$ -</u>

**Kentucky Power Company
 Pollution Control Environmental Facilities
 Annual Revenue Requirement
 Associated with Big Sandy Plant**

Line No. (1)	Description (2)	Capital Costs of KY Retail Revenues (3)
	<u>Return on Rate Base</u>	
1	Utility Plant Installed Net (Exhibit LPM-1, L5)	\$ -
2	Less: Accumulated Depreciation	\$ -
3	Less: Accumulated Deferred Income Taxes	\$ -
4	Net Utility Plant (L1- L2 - L3)	\$ -
5	Annual Weighted Average Cost of Capital (Exhibit LPM-3, L5, C8)	<u>10.69%</u>
6	Annual Return on Rate Base (L4 X L5)	<u>\$ -</u>
	<u>Operating Expenses</u>	
7	Annual Depreciation (L2)	\$ -
8	Annual Property Tax Expense (Exhibit LPM-4, L5)	\$ -
9	Annual Non-Fuel O&M Expense (Exhibit LPM-1, L8)	\$ -
10	Total Operating Expenses (L7 + L8 + L9)	\$ -
11	Total Revenue Requirement Associated with BS Env. Facilities (L6 + L10)	\$ -
12	Annual Revenue Allocation Factor (Exhibit LPM-5, L15, C3 or C6)	<u>78.91%</u>
13	Subtotal (L11 X L12)	\$ -
14	KY Jurisdiction Revenue Allocation Factor (Exhibit LPM-5, L14, C3)	
15	Total KY Retail Revenue Requirement (L13 X L14)	<u>\$ -</u>
16	KY Jurisdiction 12-month Revenue (Exhibit LPM-5, L13, C3)	\$ 569,593,245
17	Percent Change (L15 / L16)	0.00%

**Kentucky Power Company
Pollution Control Environmental Facilities
Weighted Cost of Capital Calculations for August 2011**

KPSC Case No. 2011-00401
Commission Staff's Second Set of Data Requests
Order Dated February 8, 2012
Item No. 23
Attachment 2
Page 3 of 15

Line No. (1)	Description (2)	Capital Balance as of April 30, 2010 ² (3)	Capital Structure (4)	Cost of Capital Rates (5)	WACC Net of Tax (6)	Gross Revenue Conversion Factor (7)	WACC Pre Tax (8)
1	Long-term Debt	\$ 550,000,000	51.941%	6.48%	3.37%		3.37%
2	Short-term Debt	\$ -	0.000%	0.83%	0.00%		0.00%
3	A/R Financing	\$ 43,588,933	4.116%	1.22%	0.05%		0.05%
4	Common Equity	\$ 465,314,088	43.943%	10.50% ¹	4.61%	1.5762 ³	7.27%
5	Total	\$ 1,058,903,021	100.000%		8.03%		10.69%

¹ Weighted Average Cost of Capital (WACC) ROR on Common Equity per Case No. 2010-00020.

² WACC Balances As of 4/30/2010 based on Case No. 2010-00318, dated September 7, 2010.

³ Gross Revenue Conversion Factor Calculations per Order in Case No. 2010-00318:

1	OPERATING REVENUE						100.0000
2	UNCOLLECTIBLE ACCOUNTS EXPENSE (0.24%)						0.2400
3	Kentucky Public Service Commission Assessment (0.15%)						0.1500
4	STATE TAXABLE PRODUCTION INCOME BEFORE 199 DEDUCTION						99.6100
5	STATE INCOME TAX EXPENSE, NET OF 199 DEDUCTION (SEE BELOW)						5.6384
6	FEDERAL TAXABLE PRODUCTION INCOME BEFORE 199 DEDUCTION						93.9716
7	199 DEDUCTION PHASE-IN						5.6372
8	FEDERAL TAXABLE PRODUCTION INCOME						88.3344
9	FEDERAL INCOME TAX EXPENSE AFTER 199 DEDUCTION (35%)						30.9171
10	AFTER-TAX PRODUCTION INCOME						57.4173
11	GROSS-UP FACTOR FOR PRODUCTION INCOME:						
12	AFTER-TAX PRODUCTION INCOME						57.4173
13	199 DEDUCTION PHASE-IN						5.6372
14	UNCOLLECTIBLE ACCOUNTS EXPENSE						0.2400
15	Kentucky Public Service Commission Assessment (0.15%)						0.1500
16	TOTAL GROSS-UP FACTOR FOR PRODUCTION INCOME (ROUNDED)						63.4445
17	BLENDED FEDERAL AND STATE TAX RATE:						
18	FEDERAL (LINE 9)						30.9171
19	STATE (LINE 5)						5.6384
20	BLENDED TAX RATE						36.5555
21	GROSS REVENUE CONVERSION FACTOR (100 / Line 16)						1.5762
	STATE INCOME TAX CALCULATION:						
1	PRE-TAX PRODUCTION INCOME						100.0000
2	COLLECTIBLE ACCOUNTS EXPENSE (0.24%)						0.2400
3	Kentucky Public Service Commission Assessment (0.15%)						0.1500
4	STATE TAXABLE PRODUCTION INCOME BEFORE 199 DEDUCTION						99.6100
5	LESS: STATE 199 DEDUCTION						5.6372
6	STATE TAXABLE PRODUCTION INCOME BEFORE 199 DEDUCTION						93.9728
7	STATE INCOME TAX RATE						6.0000
8	STATE INCOME TAX EXPENSE (LINE 6 X LINE 7)						5.6384

**Kentucky Power Company
 Pollution Control Environmental Facilities
 Estimated Property Taxes
 Associated with Big Sandy Plant Pollution Control Facilities**

Line No. (1)	Description (2)	Installed Costs (3)
1	DFGD Installed Capital at BS#2 (LPM-2, L1, C3)	\$ -
2	Less: Accumulated Depreciation (LPM-2, L2, C3)	\$ -
3	Net Plant Investment Assessed Value (L1 - L2)	\$ -
4	Property Tax Rate	<u>0.15%</u>
5	Increase in Property Tax (L3 X L4)	<u>\$ -</u>

Kentucky Power Company
Pollution Control Environmental Facilities
Revenue Allocation Percentages
12-months ended August 31, 2011

Line No. (1)	Month (2)	KY Retail Jurisdiction (3)	FERC Wholesale (4)	Total KY Full Requirement Revenues (5)=(3)+(4)	Associated Utilities (6)	Non-Associated Utilities (7)	Total Rev for Surcharge Purposes (8)=(5)+(6)+(7)
1	September 2010	\$ 40,903,323	\$ 495,401	\$ 41,398,724	\$ 6,337,586	\$ 5,270,698	\$ 53,007,008
2	October 2010	\$ 39,106,852	\$ 386,166	\$ 39,493,018	\$ 6,800,222	\$ 4,192,455	\$ 50,485,695
3	November 2010	\$ 40,488,923	\$ 410,737	\$ 40,899,660	\$ 4,661,941	\$ 3,884,802	\$ 49,446,403
4	December 2010	\$ 56,106,329	\$ 639,267	\$ 56,745,596	\$ 2,533,257	\$ 5,561,003	\$ 64,839,856
5	January 2011	\$ 65,952,346	\$ 603,837	\$ 66,556,183	\$ 5,085,114	\$ 6,199,202	\$ 77,840,499
6	February 2011	\$ 58,755,458	\$ 529,203	\$ 59,284,661	\$ 4,720,801	\$ 5,024,766	\$ 69,030,228
7	March 2011	\$ 44,307,469	\$ 459,737	\$ 44,767,206	\$ 5,691,192	\$ 5,445,168	\$ 55,903,566
8	April 2011	\$ 42,540,201	\$ 427,836	\$ 42,968,037	\$ 4,530,299	\$ 6,578,375	\$ 54,076,711
9	May 2011	\$ 40,424,987	\$ 784,420	\$ 41,209,407	\$ 6,373,043	\$ 4,536,768	\$ 52,119,218
10	June 2011	\$ 46,953,714	\$ 462,091	\$ 47,415,805	\$ 6,987,065	\$ 10,149,681	\$ 64,552,551
11	July 2011	\$ 46,534,433	\$ 530,987	\$ 47,065,420	\$ 8,031,761	\$ 13,076,250	\$ 68,173,431
12	August 2011	\$ 47,519,210	\$ 525,287	\$ 48,044,497	\$ 5,676,708	\$ 8,673,690	\$ 62,394,895
13	12-month Total	\$ 569,593,245	\$ 6,254,969	\$ 575,848,214	\$ 67,428,989	\$ 78,592,858	\$ 721,870,061
14	Rev. Alloc. %s	98.91%	1.09%	100.00%	9.34%	10.88%	100.00%
15	Rev. Alloc. %s	78.91%	0.87%				

Kentucky Power Company
 Pollution Control Environmental Facilities
 AEP Pool Surplus Companies
 Net Investment in
 Environmental Facilities

Line No. (1)	Generating Unit (2)	Description of Environmental Facilities (3)	In-Service Date (4)	Cost of Environmental Facilities (5)	Less Original Facility Cost in Base Rates (6)	OPCo or I&M Percentage (7)	I&M's Environmental Investment (8)=[(5)-(6)]x(7)	OPCo's Environmental Investment (9)=[(5)-(6)]x(7)
Surplus Companies								
1	Amos Unit 3	Dry Fly Ash Disposal Conversion	8/3/2010	\$ 58,717,352	\$ -	66.67%	\$ -	\$ 39,146,859
2	Amos Common	Hg In-Pond Chemical Treatment	7/15/2011	\$ 2,484,972	\$ -	29.89%	\$ -	\$ 742,758
3	Amos Common	FGD Hg Waste Water Treatment	4th Qtr 2012	\$ 12,827,197	\$ -	29.89%	\$ -	\$ 3,834,049
4	Amos Common	Ash Pond Discharge Diffuser	4th Qtr 2012	\$ 2,447,711	\$ -	29.89%	\$ -	\$ 731,621
5	Amos Subtotal	Sum of Lines 1 to 4		\$ 76,477,232	\$ -		\$ -	\$ 44,455,287
6	Rockport Units 1 & 2	Activated Carbon Injection (ACI)	9/28/2009	\$ 23,405,482	\$ -	85%	\$ 19,894,660	\$ -
7	Tanners Creek Units 1, 2, & 3	Selective Non-Catalytic Reduction (SNCR) System	12/11/2009	\$ 14,152,243	\$ -	100%	\$ 14,152,243	\$ -
8	Total Surplus Companies	L5 + L6 + L7		\$ 114,034,957	\$ -		\$ 34,046,903	\$ 44,455,287

Kentucky Power Company
 Pollution Control Environmental Facilities
 AEP System Pool
 Capacity Equalization Settlement for
 August 2011

Calculation of Member Capacity Surplus / (Deficit) (kW)

Line No.	Generating Company	Internal (MLR) Max 60-Minute		Member Load Ratio	Member Primary Capacity (kW)	Primary Capacity Reservation (kW)	Capacity Surplus (Deficit) (kW)
		Integrated Demand in 12 ME 8/31/11 (MW)	(3)				
1	APCo	7,542		31.181%	6,377,000	8,293,500	(1,916,500)
2	KPCo	1,596		6.598%	1,471,000	1,754,900	(283,900)
3	I&M	4,837		19.998%	5,428,000	5,319,100	108,900
4	OPCo	5,544		22.920%	8,465,000	6,096,300	2,368,700
5	CSP	4,669		19.303%	4,857,000	5,134,200	(277,200)
6	Total	24,188		100.000%	26,598,000	26,598,000	-

Calculation of Member Capacity Settlement

Generating Company	Capacity Surplus (Deficit) (kW)	Capacity Rate (\$/kW)	Estimated Credit (Charge) (\$)
7 APCo	(1,916,500)	\$13.60	(26,070,502)
8 KPCo	(283,900)	\$13.60	(3,861,944)
9 I&M	108,900	\$14.76	1,607,364
10 OPCo	2,368,700	\$13.55	32,095,885
11 CSP	(277,200)	\$13.60	(3,770,803)
12 Total	-	-	\$ -

Equalization capacity rate (The is the average \$/kW rate paid by deficit members.): **13.6032**

Kentucky Power Company
 Pollution Control Environmental Facilities
 AEP System Pool
 Capacity Rate Calculations for
 Surplus Member Companies
 August 2011

<u>Line No.</u>	<u>Description</u>	<u>Formula</u>	<u>Units</u>	<u>I&M</u>	<u>OPCo</u>
(1)	(2)	(3)	(4)	(5)	(6)
<u>Primary Capacity Investment Rate:</u>					
1	Steam Production Plant as of 12-mo ended 12/31/10		(\$)	4,040,461,038	6,654,950,782
2	Steam Capacity as of 12-mo ended 12/31/10		(kW)	<u>5,414,000</u>	<u>8,440,000</u>
3	Average Cost of Investment	L1 / L2	(\$/kW)	\$746.30	\$788.50
4	Carrying Charge (16.44% / 12 months)		(\$/kW/Month)	<u>0.0137</u>	<u>0.0137</u>
5	Primary Capacity Investment Rate	L3 X L4		\$10.22	\$10.80
<u>Monthly Fixed Operating Rate:</u>					
6	Steam Plant Operation Expense (less: fuel)		(\$)	18,440,310	17,311,512
7	1/2 Maintenance Expense		(\$)	<u>6,117,393</u>	<u>5,856,913</u>
8	Subtotal - Fixed Operating Expense	L6 + L7	(\$)	24,557,703	23,168,425
9	Steam Capability	L2	(kW)	<u>5,414,000</u>	<u>8,440,000</u>
10	Fixed Operating Rate	L8 / L9	(\$/kW)	\$4.54	\$2.75
11	Capacity Rate	L5 + L10	(\$/kW)	<u>\$14.76</u>	<u>\$13.55</u>
<u>Calculate AEP Pool Average Capacity Rate:</u>					
12	Surplus Capacity	Exhibit LPM-7, C7, L3 or L4	(kW)	108,900	2,368,700
13	Member's Percent of Pool's Total Surplus		(%)	4.40%	95.60%
14	Surplus Member's Capacity Rate	L11	(\$/kW)	\$14.76	\$13.55
15	Surpl. Memb. CAP Rate Recv. From Deficit Memb.	L13 X L14	(\$/kW)	<u>\$0.65</u>	<u>\$12.95</u>
16	AEP Pool's Average Capacity Rate		(\$/kW)		<u>\$13.60</u>

**Kentucky Power Company
 Pollution Control Environmental Facilities
 AEP System Pool Monthly
 Environmental Capacity Costs**

Line No.	Description	Exhibit or Formula	I&M	OPCo	KPCo
(1)	(2)	(3)	(4)	(5)	(6)
1	Net Cost of Environmental Facilities Investment Installed	Exhibit LPM-6, L8	\$ 34,046,903	\$ 44,455,287	
2	Installed Capacity (kW)	Exhibit LPM-8, L2	5,414,000	8,440,000	
3	Weighted Average Installed Cost (\$/kW)	L1 / L2	\$6.29	\$5.27	
4	Monthly Return on Investment	Exhibit LPM-8, L4	0.0137	0.0137	
5	Envir. Member Capacity Investment Rate (\$/kW/Mo.)	L3 X L4	\$0.09	\$0.07	
Plus: Operations & 1/2 Maintenance					
6	OPCo's Amos Unit No. 3 & Common Plant	Exhibit LPM-10, L21, C14		\$0.01	
7	I&M's: Rockport & Tanners Creek Units	Exhibit LPM-11, L15, C14	\$0.06		
8	Subtotal	L5 + L6 + L7	\$0.15	\$0.08	
9	Surplus Company Weighting	Exhibit LPM-8, L13	4.40%	95.60%	
10	Surplus Capacity	L8 X L9	\$0.01	\$0.08	\$0.09
11	KPCo's Pool Capacity Deficit	Exhibit LPM-7, L2, C7	283,900	283,900	283,900
12	KPCo's Monthly Envir. Pool Capacity Charge	L10 X L11	\$ 2,839	\$ 22,712	\$ 25,551
13	Number of months				12
14	Annual Effect of Envir. Pool Capacity Charge	L12 X L13			<u>\$ 306,612</u>

Kentucky Power Company
 Pollution Control Environmental Facilities
 Ohio Power Company

Line No.	Description	Month 1 (3)	Month 2 (4)	Month 3 (5)	Month 4 (6)	Month 5 (7)	Month 6 (8)	Month 7 (9)	Month 8 (10)	Month 9 (11)	Month 10 (12)	Month 11 (13)	Month 12 (14)	Annual (15)
Operations:														
1	Amos Unit #3 Dry Fly Ash Disposal Conversion	\$ 3,042	\$ 3,042	\$ 3,041	\$ 3,042	\$ 3,042	\$ 3,041	\$ 3,042	\$ 3,042	\$ 3,041	\$ 3,042	\$ 3,042	\$ 3,041	\$36,500.00
2	Amos Common - FGD Hg Waste Water Treatment	\$ 86,125	\$ 86,125	\$ 86,125	\$ 86,125	\$ 86,125	\$ 86,125	\$ 86,125	\$ 86,125	\$ 86,125	\$ 86,125	\$ 86,125	\$ 86,125	\$1,033,500.00
3	Amos Common - Hg In-Pond Chemical Treatment	\$ 138,125	\$ 138,125	\$ 138,125	\$ 138,125	\$ 138,125	\$ 138,125	\$ 138,125	\$ 138,125	\$ 138,125	\$ 138,125	\$ 138,125	\$ 138,125	\$1,657,500.00
4	Amos Common - Ash Pond Discharge Diffuser	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$0.00
5	Total Common Plant Operations (L2 + L3 + L4)	\$224,250	\$224,250	\$224,250	\$224,250	\$224,250	\$224,250	\$224,250	\$224,250	\$224,250	\$224,250	\$224,250	\$224,250	\$2,691,000.00
Maintenance:														
6	Amos Unit #3 Dry Fly Ash Disposal Conversion	\$ 3,042	\$ 3,042	\$ 2,867	\$ 762	\$ 20,802	\$ 1,706	\$ 4,042	\$ 3,896	\$ (4,704)	\$ 22,701	\$ 4,431	\$ 877	\$63,463.44
7	1/2 Amos Unit #3 Maintenance (L6 / 2)	\$ 1,521	\$ 1,521	\$ 1,433	\$ 381	\$ 10,401	\$ 853	\$ 2,021	\$ 1,948	\$ (2,352)	\$ 11,350	\$ 2,216	\$ 439	\$31,732.00
8	Amos Common - FGD Hg Waste Water Treatment	\$ 2,208	\$ 2,208	\$ 2,209	\$ 2,208	\$ 2,208	\$ 2,209	\$ 2,208	\$ 2,208	\$ 2,209	\$ 2,208	\$ 2,208	\$ 2,208	\$26,500.00
9	Amos Common - Hg In-Pond Chemical Treatment	\$ 3,542	\$ 3,542	\$ 3,541	\$ 3,542	\$ 3,542	\$ 3,541	\$ 3,542	\$ 3,542	\$ 3,541	\$ 3,542	\$ 3,542	\$ 3,541	\$42,500.00
10	Amos Common - Ash Pond Discharge Diffuser	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$0.00
11	Total Common Plant Maintenance (L8 + L9 + L10)	\$ 5,750	\$ 10,313	\$ 10,050	\$ 6,893	\$ 36,953	\$ 8,309	\$ 11,813	\$ 11,594	\$ (1,306)	\$ 39,801	\$ 12,397	\$ 7,066	\$159,632.44
12	1/2 Common Plant Maintenance (L11 / 2)	\$ 2,875	\$ 5,157	\$ 5,025	\$ 3,446	\$ 18,477	\$ 4,154	\$ 5,906	\$ 5,797	\$ (653)	\$ 19,900	\$ 6,199	\$ 3,533	\$79,816.00
13	Total Amos Unit #3 Fixed O&M (L1 + L7)	\$ 4,563	\$ 4,563	\$ 4,474	\$ 3,423	\$ 13,443	\$ 3,894	\$ 5,063	\$ 4,990	\$ 689	\$ 14,392	\$ 5,258	\$ 3,480	\$66,232.00
14	OPCo's % Ownership (Exh. LPM-6, L1, C7)	66.67%	66.67%	66.67%	66.67%	66.67%	66.67%	66.67%	66.67%	66.67%	66.67%	66.67%	66.67%	66.67%
15	OPCo's Share of Amos #3 Fixed O&M (L13 X L14)	\$ 3,042	\$ 3,042	\$ 2,983	\$ 2,282	\$ 8,962	\$ 2,596	\$ 3,376	\$ 3,327	\$ 459	\$ 9,595	\$ 3,506	\$ 2,320	\$45,490.00
16	Total Amos Common Plant Fixed O&M (L5 + L12)	\$ 227,125	\$ 229,407	\$ 229,275	\$ 227,696	\$ 242,727	\$ 228,404	\$ 230,156	\$ 230,047	\$ 223,597	\$ 244,150	\$ 230,449	\$ 227,783	\$2,770,816.00
17	OPCo's % Ownership (Exh. LPM-6, L2, C7)	29.89%	29.89%	29.89%	29.89%	29.89%	29.89%	29.89%	29.89%	29.89%	29.89%	29.89%	29.89%	29.89%
18	OPCo's Share of Common PI Fixed O&M (L16 X L17)	\$ 67,888	\$ 68,570	\$ 68,530	\$ 68,058	\$ 72,551	\$ 68,270	\$ 68,794	\$ 68,761	\$ 66,833	\$ 72,976	\$ 68,881	\$ 68,084	\$828,196.00
19	OPCo's Share of Fixed O&M (L15 + L16)	\$ 70,930	\$ 71,612	\$ 71,513	\$ 70,340	\$ 81,513	\$ 70,866	\$ 72,170	\$ 72,088	\$ 67,292	\$ 82,571	\$ 72,387	\$ 70,404	\$873,666.00
20	OPCo Steam Capacity (kW) (Exh. LPM-9, L2, C5)	8,440,000	8,440,000	8,440,000	8,440,000	8,440,000	8,440,000	8,440,000	8,440,000	8,440,000	8,440,000	8,440,000	8,440,000	8,440,000
21	OPCo Rate (\$/kW) (L19 / L20)	\$0.01	\$0.01	\$0.01	\$0.01	\$0.01	\$0.01	\$0.01	\$0.01	\$0.01	\$0.01	\$0.01	\$0.01	\$0.01
22	OPCo Surplus Weighting (%) (Exh. LPM-9, L9, C5)	95.60%	95.60%	95.60%	95.60%	95.60%	95.60%	95.60%	95.60%	95.60%	95.60%	95.60%	95.60%	95.60%
23	Effect on Wt. Ave. Rate (\$/kW) (L21 X L22)	\$0.01	\$0.01	\$0.01	\$0.01	\$0.01	\$0.01	\$0.01	\$0.01	\$0.01	\$0.01	\$0.01	\$0.01	\$0.01
24	Portion of Weighted Average Capacity Rate	\$0.01	\$0.01	\$0.01	\$0.01	\$0.01	\$0.01	\$0.01	\$0.01	\$0.01	\$0.01	\$0.01	\$0.01	\$0.01
25	Attributed to OPCo Facilities (L23)	283,900	283,900	283,900	283,900	283,900	283,900	283,900	283,900	283,900	283,900	283,900	283,900	283,900
26	KPCo's Pool Capacity Deficit (Exh. LPM-7, L2, C7)	\$ 2,839	\$ 2,839	\$ 2,839	\$ 2,839	\$ 2,839	\$ 2,839	\$ 2,839	\$ 2,839	\$ 2,839	\$ 2,839	\$ 2,839	\$ 2,839	\$283,900
26	KPCo's Share of OPCo (L24 X L25)	\$ 2,839	\$ 2,839	\$ 2,839	\$ 2,839	\$ 2,839	\$ 2,839	\$ 2,839	\$ 2,839	\$ 2,839	\$ 2,839	\$ 2,839	\$ 2,839	\$34,066

Kentucky Power Company
 Pollution Control Environmental Facilities
 Indiana and Michigan Power Company

Line No. (1)	Description (2)	Month 1 (3)	Month 2 (4)	Month 3 (5)	Month 4 (6)	Month 5 (7)	Month 6 (8)	Month 7 (9)	Month 8 (10)	Month 9 (11)	Month 10 (12)	Month 11 (13)	Month 12 (14)	Total (15)
	Operations:													
1	Rkpt1&2 Activated Carbon Injection (ACI)	\$ 471,649	\$ 613,139	\$ 463,686	\$ 536,123	\$ 448,647	\$ 290,791	\$ 288,112	\$ 185,345	\$ 30,592	\$ 165,068	\$ 134,893	\$ 379,076	\$3,987,119.48
2	TC 1, 2, & 3 Selective Non-Catalytic Reduction (SNCR)	\$ 1,235	\$ 26	\$ (392)	\$ (32)	\$ 5	\$ 8	\$ (16)	\$ 20	\$ 26	\$ (43)	\$ 2	\$ 107	\$945.14
	Maintenance:													
3	Rkpt1&2 Activated Carbon Injection (ACI)	\$ 2,314	\$ -	\$ 558	\$ 1,349	\$ 650	\$ -	\$ -	\$ 4,047	\$ 8,642	\$ 32,485	\$ 23,769	\$ 279	\$74,093.50
4	1/2 Rockport Maintenance (L3 / 2)	\$ 1,157	\$ -	\$ 279	\$ 675	\$ 325	\$ -	\$ -	\$ 2,024	\$ 4,321	\$ 16,243	\$ 11,884	\$ 139	\$37,047.00
5	TC 1, 2, & 3 Selective Non-Catalytic Reduction (SNCR)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$0
6	1/2 Tanners Creek Maintenance (L5 / 2)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$0
7	Total Rockport Fixed O&M (L1 + L4)	\$ 472,806	\$ 613,139	\$ 463,965	\$ 536,798	\$ 448,972	\$ 290,791	\$ 288,112	\$ 167,369	\$ 34,913	\$ 181,311	\$ 146,777	\$ 379,215	\$4,024,166.48
8	I&M's Percentage Ownership (Exh. LPM-6, L6, C7)	85.00%	85.00%	85.00%	85.00%	85.00%	85.00%	85.00%	85.00%	85.00%	85.00%	85.00%	85.00%	85.00%
9	I&M's Share of Rockport Fixed O&M (L7 X L8)	\$ 401,885	\$ 521,168	\$ 394,370	\$ 456,278	\$ 381,626	\$ 247,172	\$ 244,895	\$ 142,264	\$ 29,676	\$ 154,114	\$ 124,761	\$ 322,333	\$3,420,542.00
10	Total Tanners Creek Fixed O&M (L2 + L6)	\$ 1,235	\$ 26	\$ (392)	\$ (32)	\$ 5	\$ 8	\$ (16)	\$ 20	\$ 26	\$ (43)	\$ 2	\$ 107	\$945.14
11	I&M's Percentage Ownership (Exh. LPM-6, L7, C7)	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%
12	I&M's Share of TC Fixed O&M (L10 X L11)	\$ 1,235	\$ 26	\$ (392)	\$ (32)	\$ 5	\$ 8	\$ (16)	\$ 20	\$ 26	\$ (43)	\$ 2	\$ 107	\$946.00
13	I&M's Share of Fixed O&M (L9 + L12)	\$ 403,120	\$ 521,194	\$ 393,978	\$ 456,246	\$ 381,631	\$ 247,180	\$ 244,879	\$ 142,284	\$ 29,702	\$ 154,071	\$ 124,763	\$ 322,440	\$3,421,488.00
14	I&M Steam Capacity (kW) (Exh. LPM-9, L2, C4)	5,414,000	5,414,000	5,414,000	5,414,000	5,414,000	5,414,000	5,414,000	5,414,000	5,414,000	5,414,000	5,414,000	5,414,000	5,414,000
15	Indiana Rate (\$/kW) (L13 / L14)	\$0.07	\$0.10	\$0.07	\$0.08	\$0.07	\$0.05	\$0.05	\$0.03	\$0.01	\$0.03	\$0.02	\$0.06	\$0.06
16	I&M Surplus Weighting (%) (Exh. LPM-9, L9, C4)	4.40%	4.40%	4.40%	4.40%	4.40%	4.40%	4.40%	4.40%	4.40%	4.40%	4.40%	4.40%	4.40%
17	Effect on Wt. Ave. Rate (\$/kW) (L15 X L16)	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
18	Portion of Weighted Average Capacity Rate Attributed to I&M Environmental Controls	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
19	KPCo's Pool Capacity Deficit (Exh. LPM-7, L2, C7)	283,900	283,900	283,900	283,900	283,900	283,900	283,900	283,900	283,900	283,900	283,900	283,900	283,900
20	KPCo's Share: ACI & SNCR (L18 X L19)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$0

**Kentucky Power Company
 Pollution Control Environmental Facilities
 Rockport Environmental Surcharge Calculations
 Revenue Requirement**

<u>Line No.</u>	<u>Cost Component</u>	<u>Formula</u>	<u>Rockport Total</u>
(1)	(2)	(3)	(4)
1	Rockport #1 & #2 Activated Carbon Injection (ACI)	Exhibit LPM-6, L6, C5	\$23,405,482
2	Less: Accumulated Depreciation	L1 X 3.52%	\$823,873
3	Less: Accumulated Deferred Income Tax	L1 X 1.3%	<u>\$304,271</u>
4	Total Rate Base	L1 - L2 - L3	\$22,277,338
5	Weighted Average Cost of Capital for Aug. 2011	Exhibit LPM-3, L5, C8	10.69%
6	Monthly Weighted Average Cost of Capital	L5 / 12	<u>0.8908%</u>
7	Monthly Return on Rate Base	L4 X L6	\$198,447
<u>Operating Expenses</u>			
8	Monthly Depreciation Expense	L2 / 12	<u>\$68,656</u>
9	Total Operating Expense		\$68,656
10	Total Revenue Requirement Associated with Rockport ACI	L7 + L9	\$267,103
11	KPCo's Percentage of Rockport's upgrades	100% - Exhibit LPM-6, L6, C7	15%
12	KPCo's Portion of Rockport's upgrades	L10 X L11	\$40,065
13	Annualize		<u>12</u>
14	Annualized Revenue Requirement	L12 X L13	<u>\$ 480,780</u>

**Kentucky Power Company
 Pollution Control Environmental Facilities
 New Environmental Costs Associated with
 Allowance Inventory**

<u>Line No.</u>	<u>Description</u>	<u>Formula</u>	<u>KY Retail Rev Requirement</u>
(1)	(2)	(3)	(4)
1	Estimated Monthly CSAPR SO2 Allowance Inventory	KIUC 1-20	\$ 425,976
2	Estimated Monthly CSAPR NOx Allowance Inventory	KIUC 1-20	\$ 2,053
3	Estimated Monthly CSAPR SO2 Consumption Expense	L11 / 12	\$ 517,667
4	Estimated Monthly CSAPR NOx Consumption Expense	L12 / 12	<u>\$ (54,167)</u>
5	Net Monthly Expenses (Consumption less Gains)	L3 + L4	\$ 463,500
6	Cash Working Capital Allowance (in accordance with ES FORM 3.13)	L5 / 8	<u>\$ 57,938</u>
7	Total Rate Base	L1 + L2 + L6	\$ 485,967
8	Annual Weighted Average Cost of Capital	Exhibit LPM-3, L5, C8	<u>10.69%</u>
9	Return of Rate Base	L7 X L8	\$ 51,950
10	Estimated Monthly CSAPR SO2 Consumption Expense	Wohnhas testimony	\$ 6,212,000
11	Estimated Monthly CSAPR NOx Consumption Expense	Wohnhas testimony	<u>\$ (650,000)</u>
12	Total Operating Expenses	L10 + L11	\$ 5,562,000
13	Total Revenue Requirement	L9 + L12	\$ 5,613,950
14	Annual Revenue Allocation Factor	Exhibit LPM-5, L15, C3	<u>78.91%</u>
15	Subtotal	L13 X L14	\$ 4,429,968
16	KY Jurisdiction Revenue Allocation Factor	Exhibit LPM-5, L14, C3	<u>98.91%</u>
17	Total KY Retail Revenue Requirement	L15 X L16	<u>\$ 4,381,681</u>
18	KY Jurisdiction 12-month Revenue	Exhibit LPM-5, L13, C3	\$ 569,593,245
19	Percent Change	L17 / L18	<u>0.77%</u>

**Kentucky Power Company
 Pollution Control Environmental Facilities
 New Environmental Costs
 Effect on Residential Customers**

<u>Line No.</u>	<u>Description</u>	<u>Formula</u>	<u>Annual Amount</u>	<u>Percent Increase</u>
(1)	(2)	(3)	(5)	(6)
1	Annual Effect of New Environmental Pool Capacity Charges	Exhibit LPM-9, L14	\$306,612	
2	KPCo's Share of Rockport	Exhibit LPM-12, L14	<u>\$480,780</u>	
3	Total Environmental Cost	L1 + L2	<u>\$787,392</u>	
4	KPCo's Average Retail Allocation for 12 months ended August 2011	Exhibit LPM-5, L.15, C3	<u>78.91%</u>	
5	Net Annual Impact on the Kentucky Retail Customers	L3 X L4	\$621,331	0.11%
6	KY Retail Allowances	Exhibit LPM-13, L17, C4	\$4,381,681	0.77%
7	KY Retail Revenue Requirement for Big Sandy Environmental Additions	Exhibit LPM-2, L15, C3	<u>\$0</u>	<u>0.00%</u>
8	Total Environmental Projects in this Filing	L5 + L6 + L7	\$5,003,012	0.88%
9	Billed Revenues for 12 months ended August 2011	Exhibit LPM-5, L13, C3	<u>\$569,593,245</u>	
10	Percent Increase	L8 / L9	0.88%	
		Usage in kWh:	<u>1,000</u>	
11	Monthly Effect on a Residential Customers		\$ 0.86	
12	Annualize		<u>12</u>	
13	Annual Effect on a Residential Customers	L11 X L12	<u>\$ 10.32</u>	

Kentucky Power Company
 New Environmental Costs
 Effect on Residential Customer

Typical Residential Bill - computed on average monthly kWh usage of:		1,000 kWh			
	<u>Rate</u>	<u>Now</u>	<u>If Approved</u>	<u>Monthly Increase</u>	<u>Annual Increase</u>
Service Charge (\$/customer)	\$8.00	\$ 8.00	\$ 8.00		
Energy Usage (\$/kWh)	\$0.0859	\$ 85.90	\$ 85.90		
Fuel Adjustment Charge for August 2011 (\$/kWh)	(\$0.0006513)	\$ (0.65)	\$ (0.65)		
Capacity Charge (\$/kWh)	\$0.00097	\$ 0.97	\$ 0.97		
Demand-side Management (\$/kWh)	\$0.000774	\$ 0.77	\$ 0.77		
Home Energy Assistance Program (\$/customer)		\$ 0.15	\$ 0.15		
Subtotal 1		\$ 95.14	\$ 95.14		
Environmental Surcharge for August 2011 (Subtotal 1 x rate)	2.9277%	\$ 2.79	\$ 33.54	\$ 30.75	
Subtotal 2		\$ 97.93	\$ 128.68		
Monthly effect on a Residential Customer				\$ 30.75	\$ 369.00
Percent Increase (As Filed)			31.40%		
Subtotal 1		\$ 95.14	\$ 95.14		
Environmental Surcharge for August 2011 (Subtotal 1 x rate)	2.9277%	\$ 2.79	\$ 3.65	\$ 0.86	
Subtotal 2		\$ 97.93	\$ 98.79		
Monthly effect on a Residential Customer				\$ 0.86	\$ 10.32
Percent Increase (Revised)			0.88%		

Typical Residential Bill - computed on average monthly kWh usage of:		1,376 kWh			
	<u>Rate</u>	<u>Now</u>	<u>If Approved</u>	<u>Monthly Increase</u>	<u>Annual Increase</u>
Service Charge (\$/customer)	\$8.00	\$ 8.00	\$ 8.00		
Energy Usage (\$/kWh)	\$0.0859	\$ 118.20	\$ 118.20		
Fuel Adjustment Charge for August 2011 (\$/kWh)	(\$0.0006513)	\$ (0.90)	\$ (0.90)		
Capacity Charge (\$/kWh)	\$0.00097	\$ 1.33	\$ 1.33		
Demand-side Management (\$/kWh)	\$0.000774	\$ 1.07	\$ 1.07		
Home Energy Assistance Program (\$/customer)		\$ 0.15	\$ 0.15		
Subtotal 1		\$ 127.85	\$ 127.85		
Environmental Surcharge for August 2011 (Subtotal 1 x rate)	2.9277%	\$ 3.74	\$ 45.06	\$ 41.32	
Subtotal 2		\$ 131.59	\$ 172.91		
Monthly effect on a Residential Customer				\$ 41.32	\$ 495.84
Percent Increase (As Filed)			31.40%		
Subtotal 1		\$ 127.85	\$ 127.85		
Environmental Surcharge for August 2011 (Subtotal 1 x rate)	2.9277%	\$ 3.74	\$ 4.90	\$ 1.16	
Subtotal 2		\$ 131.59	\$ 132.75		
Monthly effect on a Residential Customer				\$ 1.16	\$ 13.92
Percent Increase			0.88%		

Big Sandy Capital in \$Ms	\$ -
Rockport Capital in \$Ms	\$ 23
Amos & Tanners Creek Pool Capital in \$Ms	\$ 91
	\$ 114

**Kentucky Power Company
 Pollution Control Environmental Facilities
 Big Sandy Plant
 Dry Flue Gas Desulfurization (DFGD)**

Line No. (1)	Big Sandy Unit #2 Description (2)	Dry Flue Gas Desulfurization Unit (DFGD) (3)
	In-Service Date: Second Quarter of 2016	
1	Total Capital Environmental Costs	\$ -
2	Preliminary Scrubber Analysis 2004-2006	\$ -
3	Capital Costs Not Associated with CAA	\$ -
4	Capital Booked in Last Base Case	\$ -
5	KPCo's Net In-Service Investment (L1 + L2 - L3 - L4)	<u>\$ -</u>
6	Annual Operation Expense	\$ -
7	Annual Maintenance Expense	\$ -
8	Total Operation & Maintenance Expense	<u>\$ -</u>

**Kentucky Power Company
 Pollution Control Environmental Facilities
 Annual Revenue Requirement
 Associated with Big Sandy Plant**

Line No. (1)	Description (2)	Capital Costs of KY Retail Revenues (3)
	<u>Return on Rate Base</u>	
1	Utility Plant Installed Net (Exhibit LPM-1, L5)	\$ -
2	Less: Accumulated Depreciation	\$ -
3	Less: Accumulated Deferred Income Taxes	\$ -
4	Net Utility Plant (L1- L2 - L3)	\$ -
5	Annual Weighted Average Cost of Capital (Exhibit LPM-3, L5, C8)	<u>10.69%</u>
6	Annual Return on Rate Base (L4 X L5)	<u>\$ -</u>
	<u>Operating Expenses</u>	
7	Annual Depreciation (L2)	\$ -
8	Annual Property Tax Expense (Exhibit LPM-4, L5)	\$ -
9	Annual Non-Fuel O&M Expense (Exhibit LPM-1, L8)	\$ -
10	Total Operating Expenses (L7 + L8 + L9)	\$ -
11	Total Revenue Requirement Associated with BS Env. Facilities (L6 + L10)	\$ -
12	Annual Revenue Allocation Factor (Exhibit LPM-5, L15, C3 or C6)	<u>78.91%</u>
13	Subtotal (L11 X L12)	\$ -
14	KY Jurisdiction Revenue Allocation Factor (Exhibit LPM-5, L14, C3)	
15	Total KY Retail Revenue Requirement (L13 X L14)	<u>\$ -</u>
16	KY Jurisdiction 12-month Revenue (Exhibit LPM-5, L13, C3)	\$ 569,593,245
17	Percent Change (L15 / L16)	0.00%

Kentucky Power Company
Pollution Control Environmental Facilities
Weighted Cost of Capital Calculations for August 2011

Line No. (1)	Description (2)	Capital Balance as of April 30, 2010 ² (3)	Capital Structure (4)	Cost of Capital Rates (5)	WACC Net of Tax (6)	Gross Revenue Conversion Factor (7)	WACC Pre Tax (8)
1	Long-term Debt	\$ 550,000,000	51.941%	6.48%	3.37%		3.37%
2	Short-term Debt	\$ -	0.000%	0.83%	0.00%		0.00%
3	A/R Financing	\$ 43,588,933	4.116%	1.22%	0.05%		0.05%
4	Common Equity	\$ 465,314,088	43.943%	10.50% ¹	4.61%	1.5762 ³	7.27%
5	Total	\$ 1,058,903,021	100.000%		8.03%		10.69%

¹ Weighted Average Cost of Capital (WACC) ROR on Common Equity per Case No. 2010-00020.

² WACC Balances As of 4/30/2010 based on Case No. 2010-00318, dated September 7, 2010.

³ Gross Revenue Conversion Factor Calculations per Order in Case No. 2010-00318:

1	OPERATING REVENUE						100.0000
2	UNCOLLECTIBLE ACCOUNTS EXPENSE (0.24%)						0.2400
3	Kentucky Public Service Commission Assessment (0.15%)						0.1500
4	STATE TAXABLE PRODUCTION INCOME BEFORE 199 DEDUCTION						99.6100
5	STATE INCOME TAX EXPENSE, NET OF 199 DEDUCTION (SEE BELOW)						5.6384
6	FEDERAL TAXABLE PRODUCTION INCOME BEFORE 199 DEDUCTION						93.9716
7	199 DEDUCTION PHASE-IN						5.6372
8	FEDERAL TAXABLE PRODUCTION INCOME						88.3344
9	FEDERAL INCOME TAX EXPENSE AFTER 199 DEDUCTION (35%)						30.9171
10	AFTER-TAX PRODUCTION INCOME						57.4173
11	GROSS-UP FACTOR FOR PRODUCTION INCOME:						
12	AFTER-TAX PRODUCTION INCOME						57.4173
13	199 DEDUCTION PHASE-IN						5.6372
14	UNCOLLECTIBLE ACCOUNTS EXPENSE						0.2400
15	Kentucky Public Service Commission Assessment (0.15%)						0.1500
16	TOTAL GROSS-UP FACTOR FOR PRODUCTION INCOME (ROUNDED)						63.4445
17	BLENDED FEDERAL AND STATE TAX RATE:						
18	FEDERAL (LINE 9)						30.9171
19	STATE (LINE 5)						5.6384
20	BLENDED TAX RATE						36.5555
21	GROSS REVENUE CONVERSION FACTOR (100 / Line 16)						1.5762
	STATE INCOME TAX CALCULATION:						
1	PRE-TAX PRODUCTION INCOME						100.0000
2	COLLECTIBLE ACCOUNTS EXPENSE (0.24%)						0.2400
3	Kentucky Public Service Commission Assessment (0.15%)						0.1500
4	STATE TAXABLE PRODUCTION INCOME BEFORE 199 DEDUCTION						99.6100
5	LESS: STATE 199 DEDUCTION						5.6372
6	STATE TAXABLE PRODUCTION INCOME BEFORE 199 DEDUCTION						93.9728
7	STATE INCOME TAX RATE						6.0000
8	STATE INCOME TAX EXPENSE (LINE 6 X LINE 7)						5.6384

**Kentucky Power Company
 Pollution Control Environmental Facilities
 Estimated Property Taxes
 Associated with Big Sandy Plant Pollution Control Facilities**

Line No. (1)	Description (2)	Installed Costs (3)
1	DFGD Installed Capital at BS#2 (LPM-2, L1, C3)	\$ -
2	Less: Accumulated Depreciation (LPM-2, L2, C3)	\$ -
3	Net Plant Investment Assessed Value (L1 - L2)	\$ -
4	Property Tax Rate	<u>0.15%</u>
5	Increase in Property Tax (L3 X L4)	<u>\$ -</u>

Kentucky Power Company
 Pollution Control Environmental Facilities
 Revenue Allocation Percentages
 12-months ended August 31, 2011

Line No. (1)	Month (2)	KY Retail Jurisdiction (3)	FERC Wholesale (4)	Total KY Full Requirement Revenues (5)=(3)+(4)	Associated Utilities (6)	Non-Associated Utilities (7)	Total Rev for Surcharge Purposes (8)=(5)+(6)+(7)
1	September 2010	\$ 40,903,323	\$ 495,401	\$ 41,398,724	\$ 6,337,586	\$ 5,270,698	\$ 53,007,008
2	October 2010	\$ 39,106,852	\$ 386,166	\$ 39,493,018	\$ 6,800,222	\$ 4,192,455	\$ 50,485,695
3	November 2010	\$ 40,488,923	\$ 410,737	\$ 40,899,660	\$ 4,661,941	\$ 3,884,802	\$ 49,446,403
4	December 2010	\$ 56,106,329	\$ 639,267	\$ 56,745,596	\$ 2,533,257	\$ 5,561,003	\$ 64,839,856
5	January 2011	\$ 65,952,346	\$ 603,837	\$ 66,556,183	\$ 5,085,114	\$ 6,199,202	\$ 77,840,499
6	February 2011	\$ 58,755,458	\$ 529,203	\$ 59,284,661	\$ 4,720,801	\$ 5,024,766	\$ 69,030,228
7	March 2011	\$ 44,307,469	\$ 459,737	\$ 44,767,206	\$ 5,691,192	\$ 5,445,168	\$ 55,903,566
8	April 2011	\$ 42,540,201	\$ 427,836	\$ 42,968,037	\$ 4,530,299	\$ 6,578,375	\$ 54,076,711
9	May 2011	\$ 40,424,987	\$ 784,420	\$ 41,209,407	\$ 6,373,043	\$ 4,536,768	\$ 52,119,218
10	June 2011	\$ 46,953,714	\$ 462,091	\$ 47,415,805	\$ 6,987,065	\$ 10,149,681	\$ 64,552,551
11	July 2011	\$ 46,534,433	\$ 530,987	\$ 47,065,420	\$ 8,031,761	\$ 13,076,250	\$ 68,173,431
12	August 2011	\$ 47,519,210	\$ 525,287	\$ 48,044,497	\$ 5,676,708	\$ 8,673,690	\$ 62,394,895
13	12-month Total	\$ 569,593,245	\$ 6,254,969	\$ 575,848,214	\$ 67,428,989	\$ 78,592,858	\$ 721,870,061
14	Rev. Alloc. %s	98.91%	1.09%	100.00%	9.34%	10.88%	100.00%
15	Rev. Alloc. %s	78.91%	0.87%				

Kentucky Power Company
 Pollution Control Environmental Facilities
 AEP Pool Surplus Companies
 Net Investment in
 Environmental Facilities

Line No. (1)	Generating Unit (2)	Description of Environmental Facilities (3)	In-Service Date (4)	Cost of Environmental Facilities (5)	Less Original Facility Cost in Base Rates (6)	OPCo or I&M Percentage (7)	I&M's Environmental Investment (8)=[(5)-(6)]X(7)	OPCo's Environmental Investment (9)=[(5)-(6)]X(7)
<u>Surplus Companies</u>								
1	Amos Unit 3	Dry Fly Ash Disposal Conversion	8/3/2010	\$ 58,717,352	\$ -	66.67%	\$ -	\$ 39,146,859
2	Amos Common	Hg In-Pond Chemical Treatment	7/15/2011	\$ 2,484,972	\$ -	29.89%	\$ -	\$ 742,758
3	Amos Common	FGD Hg Waste Water Treatment	4th Qtr 2012	\$ -	\$ -	29.89%	\$ -	\$ -
4	Amos Common	Ash Pond Discharge Diffuser	4th Qtr 2012	\$ -	\$ -	29.89%	\$ -	\$ -
5	Amos Subtotal	Sum of Lines 1 to 4		\$ 61,202,324	\$ -		\$ -	\$ 39,889,617
6	Rockport Units 1 & 2	Activated Carbon Injection (ACI)	9/28/2009	\$ 23,405,482	\$ -	85%	\$ 19,894,660	\$ -
7	Tanners Creek Units 1, 2, & 3	Selective Non-Catalytic Reduction (SNCR) System	12/11/2009	\$ 14,152,243	\$ -	100%	\$ 14,152,243	\$ -
8	Total Surplus Companies	L5 + L6 + L7		\$ 98,760,049	\$ -		\$ 34,046,903	\$ 39,889,617

Kentucky Power Company
 Pollution Control Environmental Facilities
 AEP System Pool
 Capacity Equalization Settlement for
 August 2011

Calculation of Member Capacity Surplus / (Deficit) (kW)

Line No.	Generating Company	Internal (MLR) Max 60-Minute		Member Load Ratio	Member Primary Capacity (kW)	Primary Capacity Reservation (kW)	Capacity Surplus (Deficit) (kW)
		Integrated Demand in 12 ME 8/31/11 (MW)	(3)				
1	APCo	7,542		31.181%	6,377,000	8,293,500	(1,916,500)
2	KPCo	1,596		6.598%	1,471,000	1,754,900	(283,900)
3	I&M	4,837		19.998%	5,428,000	5,319,100	108,900
4	OPCo	5,544		22.920%	8,465,000	6,096,300	2,368,700
5	CSP	4,669		19.303%	4,857,000	5,134,200	(277,200)
6	Total	24,188		100.000%	26,598,000	26,598,000	-

Calculation of Member Capacity Settlement

Generating Company	Capacity Surplus (Deficit) (kW)	Capacity Rate (\$/kW)	Estimated Credit (Charge) (\$)
7 APCo	(7)=(5)-(6) (1,916,500)	\$13.60	(26,070,502)
8 KPCo	(283,900)	\$13.60	(3,861,944)
9 I&M	108,900	\$14.76	1,607,364
10 OPCo	2,368,700	\$13.55	32,095,885
11 CSP	(277,200)	\$13.60	(3,770,803)
12 Total	-		\$ -

Equalization capacity rate (The is the average \$/kW rate paid by deficit members.): **13.6032**

Kentucky Power Company
Pollution Control Environmental Facilities
AEP System Pool
Capacity Rate Calculations for
Surplus Member Companies
August 2011

Line No.	Description	Formula	Units	I&M	OPCo
(1)	(2)	(3)	(4)	(5)	(6)
Primary Capacity Investment Rate:					
1	Steam Production Plant as of 12-mo ended 12/31/10		(\$)	4,040,461,038	6,654,950,782
2	Steam Capacity as of 12-mo ended 12/31/10		(kW)	<u>5,414,000</u>	<u>8,440,000</u>
3	Average Cost of Investment	L1 / L2	(\$/kW)	\$746.30	\$788.50
4	Carrying Charge (16.44% / 12 months)		(\$/kW/Month)	<u>0.0137</u>	<u>0.0137</u>
5	Primary Capacity Investment Rate	L3 X L4		\$10.22	\$10.80
Monthly Fixed Operating Rate:					
6	Steam Plant Operation Expense (less: fuel)		(\$)	18,440,310	17,311,512
7	1/2 Maintenance Expense		(\$)	<u>6,117,393</u>	<u>5,856,913</u>
8	Subtotal - Fixed Operating Expense	L6 + L7	(\$)	24,557,703	23,168,425
9	Steam Capability	L2	(kW)	<u>5,414,000</u>	<u>8,440,000</u>
10	Fixed Operating Rate	L8 / L9	(\$/kW)	\$4.54	\$2.75
11	Capacity Rate	L5 + L10	(\$/kW)	<u>\$14.76</u>	<u>\$13.55</u>
Calculate AEP Pool Average Capacity Rate:					
12	Surplus Capacity	Exhibit LPM-7, C7, L3 or L4	(kW)	108,900	2,368,700
13	Member's Percent of Pool's Total Surplus		(%)	4.40%	95.60%
14	Surplus Member's Capacity Rate	L11	(\$/kW)	\$14.76	\$13.55
15	Surpl. Memb. CAP Rate Recv. From Deficit Memb.	L13 X L14	(\$/kW)	<u>\$0.65</u>	<u>\$12.95</u>
16	AEP Pool's Average Capacity Rate		(\$/kW)		<u>\$13.60</u>

Kentucky Power Company
 Pollution Control Environmental Facilities
 AEP System Pool Monthly
 Environmental Capacity Costs

Line No.	Description	Exhibit or Formula	I&M (4)	OPCo (5)	KPCo (6)
(1)	(2)	(3)	(4)	(5)	(6)
1	Net Cost of Environmental Facilities Investment Installed	Exhibit LPM-6, L8	\$ 34,046,903	\$ 39,889,617	
2	Installed Capacity (kW)	Exhibit LPM-8, L2	5,414,000	8,440,000	
3	Weighted Average Installed Cost (\$/kW)	L1 / L2	\$6.29	\$4.73	
4	Monthly Return on Investment	Exhibit LPM-8, L4	0.0137	0.0137	
5	Envir. Member Capacity Investment Rate (\$/kW/Mo.)	L3 X L4	\$0.09	\$0.06	
Plus: Operations & 1/2 Maintenance					
6	OPCo's Amos Unit No. 3 & Common Plant	Exhibit LPM-10, L21, C14		\$0.01	
7	I&M's: Rockport & Tanners Creek Units	Exhibit LPM-11, L15, C14	\$0.06		
8	Subtotal	L5 + L6 + L7	\$0.15	\$0.07	
9	Surplus Company Weighting	Exhibit LPM-8, L13	4.40%	95.60%	
10	Surplus Capacity	L8 X L9	\$0.01	\$0.07	\$0.08
11	KPCo's Pool Capacity Deficit	Exhibit LPM-7, L2, C7	283,900	283,900	283,900
12	KPCo's Monthly Envir. Pool Capacity Charge	L10 X L11	\$ 2,839	\$ 19,873	\$ 22,712
13	Number of months				<u>12</u>
14	Annual Effect of Envir. Pool Capacity Charge	L12 X L13			<u>\$ 272,544</u>

Kentucky Power Company
 Pollution Control Environmental Facilities
 Ohio Power Company

Line No.	Description	Month 1 (3)	Month 2 (4)	Month 3 (5)	Month 4 (6)	Month 5 (7)	Month 6 (8)	Month 7 (9)	Month 8 (10)	Month 9 (11)	Month 10 (12)	Month 11 (13)	Month 12 (14)	Annual (15)
(1)	Operations:													
1	Amos Unit #3 Dry Fly Ash Disposal Conversion	\$ 3,042	\$ 3,042	\$ 3,041	\$ 3,042	\$ 3,042	\$ 3,041	\$ 3,042	\$ 3,042	\$ 3,041	\$ 3,042	\$ 3,042	\$ 3,041	\$36,500.00
2	Amos Common - FGD Hg Waste Water Treatment	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$0.00
3	Amos Common - Hg In-Pond Chemical Treatment	\$ 138,125	\$ 138,125	\$ 138,125	\$ 138,125	\$ 138,125	\$ 138,125	\$ 138,125	\$ 138,125	\$ 138,125	\$ 138,125	\$ 138,125	\$ 138,125	\$1,657,500.00
4	Amos Common - Ash Pond Discharge Diffuser	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$0.00
5	Total Common Plant Operations (L2 + L3 + L4)	\$ 138,125	\$ 138,125	\$ 138,125	\$ 138,125	\$ 138,125	\$ 138,125	\$ 138,125	\$ 138,125	\$ 138,125	\$ 138,125	\$ 138,125	\$ 138,125	\$1,657,500.00
	Maintenance:													
6	Amos Unit #3 Dry Fly Ash Disposal Conversion	\$ 3,042	\$ 3,042	\$ 2,867	\$ 762	\$ 20,802	\$ 1,706	\$ 4,042	\$ 3,896	\$ (4,704)	\$ 22,701	\$ 4,431	\$ 877	\$63,463.44
7	1/2 Amos Unit #3 Maintenance (L6 / 2)	\$ 1,521	\$ 1,521	\$ 1,433	\$ 381	\$ 10,401	\$ 853	\$ 2,021	\$ 1,948	\$ (2,352)	\$ 11,350	\$ 2,216	\$ 439	\$31,732.00
8	Amos Common - FGD Hg Waste Water Treatment	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$0.00
9	Amos Common - Hg In-Pond Chemical Treatment	\$ 3,542	\$ 3,542	\$ 3,541	\$ 3,542	\$ 3,542	\$ 3,541	\$ 3,542	\$ 3,542	\$ 3,541	\$ 3,542	\$ 3,542	\$ 3,541	\$42,500.00
10	Amos Common - Ash Pond Discharge Diffuser	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$0.00
11	Total Common Plant Maintenance (L8 + L9 + L10)	\$ 3,542	\$ 8,105	\$ 7,841	\$ 4,685	\$ 34,745	\$ 6,100	\$ 9,605	\$ 9,386	\$ (3,515)	\$ 37,593	\$ 10,189	\$ 4,857	\$133,132.44
12	1/2 Common Plant Maintenance (L11 / 2)	\$ 1,771	\$ 4,053	\$ 3,920	\$ 2,342	\$ 17,373	\$ 3,050	\$ 4,802	\$ 4,693	\$ (1,758)	\$ 18,796	\$ 5,095	\$ 2,429	\$56,566.00
13	Total Amos Unit #3 Fixed O&M (L1 + L7)	\$ 4,563	\$ 4,563	\$ 4,474	\$ 3,423	\$ 13,443	\$ 3,894	\$ 5,063	\$ 4,990	\$ 689	\$ 14,392	\$ 5,258	\$ 3,480	\$68,232.00
14	OPCo's % Ownership (Exh. LPM-6, L1, C7)	66.67%	66.67%	66.67%	66.67%	66.67%	66.67%	66.67%	66.67%	66.67%	66.67%	66.67%	66.67%	
15	OPCo's Share of Amos #3 Fixed O&M (L13 X L14)	\$ 3,042	\$ 3,042	\$ 2,983	\$ 2,282	\$ 8,962	\$ 2,596	\$ 3,376	\$ 3,327	\$ 459	\$ 9,595	\$ 3,506	\$ 2,320	\$45,490.00
16	Total Amos Common Plant Fixed O&M (L5 + L12)	\$ 139,896	\$ 142,178	\$ 142,045	\$ 140,467	\$ 155,498	\$ 141,175	\$ 142,827	\$ 142,818	\$ 136,367	\$ 156,921	\$ 143,220	\$ 140,554	\$1,724,066.00
17	OPCo's % Ownership (Exh. LPM-6, L2, C7)	29.89%	29.89%	29.89%	29.89%	29.89%	29.89%	29.89%	29.89%	29.89%	29.89%	29.89%	29.89%	
18	OPCo's Share of Common PI Fixed O&M (L16 X L17)	\$ 41,815	\$ 42,487	\$ 42,457	\$ 41,986	\$ 46,478	\$ 42,197	\$ 42,721	\$ 42,868	\$ 40,760	\$ 46,904	\$ 42,808	\$ 42,012	\$515,323.00
19	OPCo's Share of Fixed O&M (L15 + L18)	\$ 44,857	\$ 45,539	\$ 45,440	\$ 44,268	\$ 55,440	\$ 44,793	\$ 46,097	\$ 46,015	\$ 41,219	\$ 56,499	\$ 46,314	\$ 44,332	\$560,813.00
20	OPCo Steam Capacity (kW) (Exh. LPM-9, L2, C5)	9,440,000	9,440,000	9,440,000	9,440,000	9,440,000	9,440,000	9,440,000	9,440,000	9,440,000	9,440,000	9,440,000	9,440,000	
21	OPCo Rate (\$/kW) (L19 / L20)	\$0.01	\$0.01	\$0.01	\$0.01	\$0.01	\$0.01	\$0.01	\$0.01	\$0.01	\$0.01	\$0.01	\$0.01	
22	OPCo Surplus Weighting (%) (Exh. LPM-9, L9, C5)	95.60%	95.60%	95.60%	95.60%	95.60%	95.60%	95.60%	95.60%	95.60%	95.60%	95.60%	95.60%	
23	Effect on Wt. Ave. Rate (\$/kW) (L21 X L22)	\$0.01	\$0.01	\$0.01	\$0.01	\$0.01	\$0.01	\$0.01	\$0.01	\$0.01	\$0.01	\$0.01	\$0.01	
24	Portion of Weighted Average Capacity Rate	\$0.01	\$0.01	\$0.01	\$0.01	\$0.01	\$0.01	\$0.01	\$0.01	\$0.01	\$0.01	\$0.01	\$0.01	
25	Attributed to OPCo Facilities (L23)	283,900	283,900	283,900	283,900	283,900	283,900	283,900	283,900	283,900	283,900	283,900	283,900	283,900
26	KPCo's Pool Capacity Deficit (Exh. LPM-7, L2, C7)	\$ 2,839	\$ 2,839	\$ 2,839	\$ 2,839	\$ 2,839	\$ 2,839	\$ 2,839	\$ 2,839	\$ -	\$ 2,839	\$ 2,839	\$ 2,839	\$31,229
26	KPCo's Share of OPCo (L24 X L25)													

Kentucky Power Company
 Pollution Control Environmental Facilities
 Indiana and Michigan Power Company

Line No. (1)	Description (2)	Month 1 (3)	Month 2 (4)	Month 3 (5)	Month 4 (6)	Month 5 (7)	Month 6 (8)	Month 7 (9)	Month 8 (10)	Month 9 (11)	Month 10 (12)	Month 11 (13)	Month 12 (14)	Total (15)
Operations:														
1	Rkp11&2 Activated Carbon Injection (ACI)	\$ 471,649	\$ 613,139	\$ 463,686	\$ 536,123	\$ 448,647	\$ 290,791	\$ 288,112	\$ 165,345	\$ 30,592	\$ 165,068	\$ 134,993	\$ 379,076	\$3,987,119.48
2	TC 1, 2, &3 Selective Non-Catalytic Reduction (SNCR)	\$ 1,235	\$ 26	\$ (392)	\$ (32)	\$ 5	\$ 8	\$ (16)	\$ 20	\$ 26	\$ (43)	\$ 2	\$ 107	\$945.14
Maintenance:														
3	Rkp11&2 Activated Carbon Injection (ACI)	\$ 2,314	\$ -	\$ 558	\$ 1,349	\$ 650	\$ -	\$ -	\$ 4,047	\$ 8,642	\$ 32,485	\$ 23,769	\$ 279	\$74,093.50
4	1/2 Rockport Maintenance (L3 / 2)	\$ 1,157	\$ -	\$ 279	\$ 675	\$ 325	\$ -	\$ -	\$ 2,024	\$ 4,321	\$ 16,243	\$ 11,884	\$ 139	\$37,047.00
5	TC 1, 2, &3 Selective Non-Catalytic Reduction (SNCR)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$0
6	1/2 Tanners Creek Maintenance (L5 / 2)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$0
7	Total Rockport Fixed O&M (L1 + L4)	\$ 472,806	\$ 613,139	\$ 463,965	\$ 536,798	\$ 448,972	\$ 290,791	\$ 288,112	\$ 167,369	\$ 34,913	\$ 181,311	\$ 146,777	\$ 379,215	\$4,024,166.48
8	I&M's Percentage Ownership (Exh. LPM-6, L6, C7, L8)	85.00%	85.00%	85.00%	85.00%	85.00%	85.00%	85.00%	85.00%	85.00%	85.00%	85.00%	85.00%	85.00%
9	I&M's Share of Rockport Fixed O&M (L7 X L8)	\$ 401,885	\$ 521,168	\$ 394,370	\$ 456,278	\$ 381,626	\$ 247,172	\$ 244,895	\$ 142,264	\$ 29,676	\$ 154,114	\$ 124,761	\$ 322,333	\$3,420,542.00
10	Total Tanners Creek Fixed O&M (L2 + L6)	\$ 1,235	\$ 26	\$ (392)	\$ (32)	\$ 5	\$ 8	\$ (16)	\$ 20	\$ 26	\$ (43)	\$ 2	\$ 107	\$945.14
11	I&M's Percentage Ownership (Exh. LPM-6, L7, C7, L8)	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%
12	I&M's Share of TC Fixed O&M (L10 X L11)	\$ 1,235	\$ 26	\$ (392)	\$ (32)	\$ 5	\$ 8	\$ (16)	\$ 20	\$ 26	\$ (43)	\$ 2	\$ 107	\$945.14
13	I&M's Share of Fixed O&M (L9 + L12)	\$ 403,120	\$ 521,194	\$ 393,978	\$ 456,246	\$ 381,631	\$ 247,180	\$ 244,879	\$ 142,284	\$ 29,702	\$ 154,071	\$ 124,763	\$ 322,440	\$3,421,488.00
14	I&M Steam Capacity (KW) (Exh. LPM-9, L2, C4)	5,414,000	5,414,000	5,414,000	5,414,000	5,414,000	5,414,000	5,414,000	5,414,000	5,414,000	5,414,000	5,414,000	5,414,000	5,414,000
15	Indiana Rate (\$/kW) (L13 / L14)	\$0.07	\$0.10	\$0.07	\$0.08	\$0.07	\$0.05	\$0.05	\$0.03	\$0.01	\$0.03	\$0.02	\$0.06	\$0.06
16	I&M Surplus Weighting (%) (Exh LPM-9, L9, C4)	4.40%	4.40%	4.40%	4.40%	4.40%	4.40%	4.40%	4.40%	4.40%	4.40%	4.40%	4.40%	4.40%
17	Effect on Wtr. Ave. Rate (\$/kW) (L15 X L16)	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
18	Portion of Weighted Average Capacity Rate Attributed to I&M Environmental Controls	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
19	KPCo's Pool Capacity Deficit (Exh. LPM-7, L2, C7, L8)	283,900	283,900	283,900	283,900	283,900	283,900	283,900	283,900	283,900	283,900	283,900	283,900	283,900
20	KPCo's Share: ACI & SNCR (L18 X L19)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -

**Kentucky Power Company
 Pollution Control Environmental Facilities
 Rockport Environmental Surcharge Calculations
 Revenue Requirement**

<u>Line No.</u>	<u>Cost Component</u>	<u>Formula</u>	<u>Rockport Total</u>
(1)	(2)	(3)	(4)
1	Rockport #1 & #2 Activated Carbon Injection (ACI)	Exhibit LPM-6, L6, C5	\$23,405,482
2	Less: Accumulated Depreciation	L1 X 3.52%	\$823,873
3	Less: Accumulated Deferred Income Tax	L1 X 1.3%	<u>\$304,271</u>
4	Total Rate Base	L1 - L2 - L3	\$22,277,338
5	Weighted Average Cost of Capital for Aug. 2011	Exhibit LPM-3, L5, C8	10.69%
6	Monthly Weighted Average Cost of Capital	L5 / 12	<u>0.8908%</u>
7	Monthly Return on Rate Base	L4 X L6	\$198,447
<u>Operating Expenses</u>			
8	Monthly Depreciation Expense	L2 / 12	<u>\$68,656</u>
9	Total Operating Expense		\$68,656
10	Total Revenue Requirement Associated with Rockport ACI	L7 + L9	\$267,103
11	KPCo's Percentage of Rockport's upgrades	100% - Exhibit LPM-6, L6, C7	15%
12	KPCo's Portion of Rockport's upgrades	L10 X L11	\$40,065
13	Annualize		<u>12</u>
14	Annualized Revenue Requirement	L12 X L13	<u>\$ 480,780</u>

**Kentucky Power Company
 Pollution Control Environmental Facilities
 New Environmental Costs Associated with
 Allowance Inventory**

<u>Line No.</u>	<u>Description</u>	<u>Formula</u>	<u>KY Retail Rev Requirement</u>
(1)	(2)	(3)	(4)
1	Estimated Monthly CSAPR SO2 Allowance Inventory	KIUC 1-20	\$ 425,976
2	Estimated Monthly CSAPR NOx Allowance Inventory	KIUC 1-20	\$ 2,053
3	Estimated Monthly CSAPR SO2 Consumption Expense	L11 / 12	\$ 517,667
4	Estimated Monthly CSAPR NOx Consumption Expense	L12 / 12	<u>\$ (54,167)</u>
5	Net Monthly Expenses (Consumption less Gains)	L3 + L4	\$ 463,500
6	Cash Working Capital Allowance (in accordance with ES FORM 3.13)	L5 / 8	<u>\$ 57,938</u>
7	Total Rate Base	L1 + L2 + L6	\$ 485,967
8	Annual Weighted Average Cost of Capital	Exhibit LPM-3, L5, C8	<u>10.69%</u>
9	Return of Rate Base	L7 X L8	\$ 51,950
10	Estimated Monthly CSAPR SO2 Consumption Expense	Wohnhas testimony	\$ 6,212,000
11	Estimated Monthly CSAPR NOx Consumption Expense	Wohnhas testimony	<u>\$ (650,000)</u>
12	Total Operating Expenses	L10 + L11	\$ 5,562,000
13	Total Revenue Requirement	L9 + L12	\$ 5,613,950
14	Annual Revenue Allocation Factor	Exhibit LPM-5, L15, C3	<u>78.91%</u>
15	Subtotal	L13 X L14	\$ 4,429,968
16	KY Jurisdiction Revenue Allocation Factor	Exhibit LPM-5, L14, C3	<u>98.91%</u>
17	Total KY Retail Revenue Requirement	L15 X L16	<u>\$ 4,381,681</u>
18	KY Jurisdiction 12-month Revenue	Exhibit LPM-5, L13, C3	\$ 569,593,245
19	Percent Change	L17 / L18	<u>0.77%</u>

**Kentucky Power Company
 Pollution Control Environmental Facilities
 New Environmental Costs
 Effect on Residential Customers**

<u>Line No.</u>	<u>Description</u>	<u>Formula</u>	<u>Annual Amount</u>	<u>Percent Increase</u>
(1)	(2)	(3)	(5)	(6)
1	Annual Effect of New Environmental Pool Capacity Charges	Exhibit LPM-9, L14	\$272,544	
2	KPCo's Share of Rockport	Exhibit LPM-12, L14	<u>\$480,780</u>	
3	Total Environmental Cost	L1 + L2	\$753,324	
4	KPCo's Average Retail Allocation for 12 months ended August 2011	Exhibit LPM-5, L.15, C3	<u>78.91%</u>	
5	Net Annual Impact on the Kentucky Retail Customers	L3 X L4	\$594,448	0.10%
6	KY Retail Allowances	Exhibit LPM-13, L17, C4	\$4,381,681	0.77%
7	KY Retail Revenue Requirement for Big Sandy Environmental Additions	Exhibit LPM-2, L15, C3	<u>\$0</u>	<u>0.00%</u>
8	Total Environmental Projects in this Filing	L5 + L6 + L7	\$4,976,129	0.87%
9	Billed Revenues for 12 months ended August 2011	Exhibit LPM-5, L13, C3	<u>\$569,593,245</u>	
10	Percent Increase	L8 / L9	0.87%	
		Usage in kWh:	<u>1,000</u>	
11	Monthly Effect on a Residential Customers		\$ 0.85	
12	Annualize		<u>12</u>	
13	Annual Effect on a Residential Customers	L11 X L12	<u>\$ 10.20</u>	

Kentucky Power Company
 New Environmental Costs
 Effect on Residential Customer

Typical Residential Bill - computed on average monthly kWh usage of:		1,000 kWh		Monthly	Annual
	Rate	Now	If Approved	Increase	Increase
Service Charge (\$/customer)	\$8.00	\$ 8.00	\$ 8.00		
Energy Usage (\$/kWh)	\$0.0859	\$ 85.90	\$ 85.90		
Fuel Adjustment Charge for August 2011 (\$/kWh)	(\$0.0006513)	\$ (0.65)	\$ (0.65)		
Capacity Charge (\$/kWh)	\$0.00097	\$ 0.97	\$ 0.97		
Demand-side Management (\$/kWh)	\$0.000774	\$ 0.77	\$ 0.77		
Home Energy Assistance Program (\$/customer)		\$ 0.15	\$ 0.15		
Subtotal 1		\$ 95.14	\$ 95.14		
Environmental Surcharge for August 2011 (Subtotal 1 x rate)	2.9277%	\$ 2.79	\$ 33.54	\$ 30.75	
Subtotal 2		\$ 97.93	\$ 128.68		
Monthly effect on a Residential Customer				\$ 30.75	\$ 369.00
Percent Increase (As Filed)					31.40%
Subtotal 1		\$ 95.14	\$ 95.14		
Environmental Surcharge for August 2011 (Subtotal 1 x rate)	2.9277%	\$ 2.79	\$ 3.64	\$ 0.85	
Subtotal 2		\$ 97.93	\$ 98.78		
Monthly effect on a Residential Customer				\$ 0.85	\$ 10.20
Percent Increase (Revised)					0.87%

Typical Residential Bill - computed on average monthly kWh usage of:		1,376 kWh		Monthly	Annual
	Rate	Now	If Approved	Increase	Increase
Service Charge (\$/customer)	\$8.00	\$ 8.00	\$ 8.00		
Energy Usage (\$/kWh)	\$0.0859	\$ 118.20	\$ 118.20		
Fuel Adjustment Charge for August 2011 (\$/kWh)	(\$0.0006513)	\$ (0.90)	\$ (0.90)		
Capacity Charge (\$/kWh)	\$0.00097	\$ 1.33	\$ 1.33		
Demand-side Management (\$/kWh)	\$0.000774	\$ 1.07	\$ 1.07		
Home Energy Assistance Program (\$/customer)		\$ 0.15	\$ 0.15		
Subtotal 1		\$ 127.85	\$ 127.85		
Environmental Surcharge for August 2011 (Subtotal 1 x rate)	2.9277%	\$ 3.74	\$ 45.06	\$ 41.32	
Subtotal 2		\$ 131.59	\$ 172.91		
Monthly effect on a Residential Customer				\$ 41.32	\$ 495.84
Percent Increase (As Filed)					31.40%
Subtotal 1		\$ 127.85	\$ 127.85		
Environmental Surcharge for August 2011 (Subtotal 1 x rate)	2.9277%	\$ 3.74	\$ 4.88	\$ 1.14	
Subtotal 2		\$ 131.59	\$ 132.73		
Monthly effect on a Residential Customer				\$ 1.14	\$ 13.68
Percent Increase					0.87%

Big Sandy Capital in \$Ms	\$ -
Rockport Capital in \$Ms	\$ 23
Amos & Tanners Creek Pool Capital in \$Ms	\$ 75
	\$ 99

Kentucky Power Company

REQUEST

Refer to Kentucky's Power's response to KIUC's First Request, Item 38. Kentucky Power collects its environmental surcharge monthly, which provides "current" cost recovery, with a two-month lag, on environmental projects previously approved as part of an environmental compliance plan. With such a timeframe for recovery of costs, identify and explain in detail all factors Kentucky Power has considered, and believes the Commission should consider, regarding the use of a cash return on the Construction Work in Progress approach for the costs of the proposed Big Sandy Unit 2 DFGD.

RESPONSE

The environmental surcharge allows the Company a timely recovery of costs for an environmental project after it is placed in service. However the customer will experience a large increase when the environmental project is placed into service. The cash return on CWIP approach provides a transition period prior to the in-service date of the project that will ease that one time large increase with smaller stepped increases and reduce the in-service cost of the project which will provide benefits to customers over the life of the asset.

WITNESS: Ranie K Wohnhas

Kentucky Power Company

REQUEST

Refer to Kentucky Power's response to Sierra Club, et al.'s Initial Requests for Information ("Sierra Club's First Request"), Item 15.

- a. Explain whether there are retirements associated with the boiler modifications.
- b. If the answer to part a. of this request is yes, provide the total amount of associated retirement.
- c. Does Kentucky Power anticipate that it will remove the associated retirement amount from the environmental surcharge revenue requirement calculations? If no, explain why.

RESPONSE

- a. There are no anticipated retirements associated with the boiler modifications.
- b. N/A.
- c. There are no anticipated boiler retirements. More generally, any retirements are accounted for in the annual plant updates at the beginning of each year.

WITNESS: Robert L Walton and Lila P Munsey

Kentucky Power Company

REQUEST

Refer to Kentucky Power's response to Sierra Club's First Request, Item 17.f., concerning Indiana & Michigan Power Company's ("I&M") Certificate of Public Convenience and Necessity filing in Indiana for a flue gas desulfurization ("FGD") on one of its Rockport Units. Explain whether the FGD is going to be placed on Rockport Unit 1, which is jointly owned by I&M and AEP Generating, or Rockport Unit 2, which is under lease.

RESPONSE

That decision had not been made as of the date of this response.

WITNESS: Ranie K Wohnhas

Kentucky Power Company

REQUEST

Refer to Kentucky Power's response to Sierra Club's First Request, Item 18.

- a. Was a depreciation study filed in Kentucky Power's last base rate case? ²
- b. If the answer to part a. of this request is yes:
 - (1) Explain whether a demolition study was prepared or updated for that depreciation study.
 - (2) Provide the estimated salvage value by functional plant or plant account used in the depreciation study.

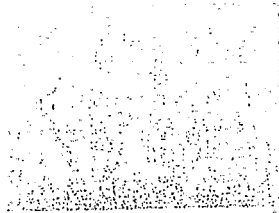
² Case No. 2009-00459, Application of Kentucky Power Company for a General Adjustment of Electric Rates (Ky. PSC Jun. 28, 2010).

RESPONSE

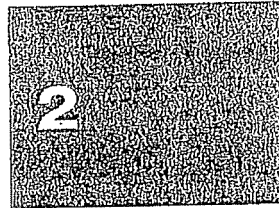
- a. Yes, a depreciation study was filed in Case No. 2009-00459.
- b. (1) The depreciation study completed was based on a June 2005 demolition study prepared by Brandenburg Industrial Service Company. Please see attachment 1 on the enclosed CD for a full copy of the demolition study.
 - (2) Please see attachment 2 on the enclosed CD for the complete depreciation study by functional plant.

WITNESS: Ranie K Wohnhas

Table of Contents

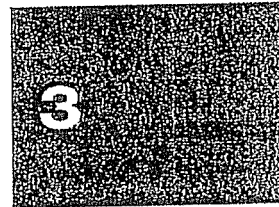


Conceptual Specification/ Cost Estimate



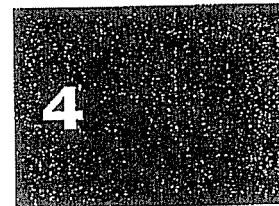
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Assumptions



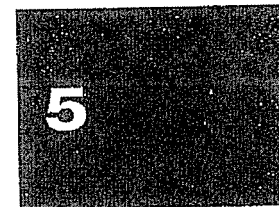
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Schedule



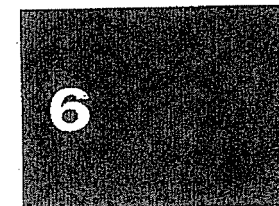
4

Method Statement



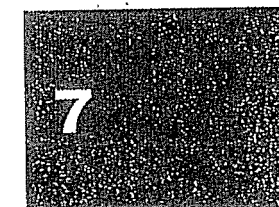
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Volume Estimates



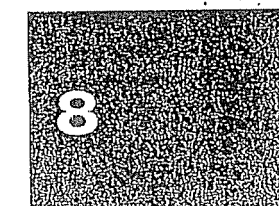
6

Quantitative Units



7

Recommendations



8

American Electric Power Company
Big Sandy Power
LOUISA, KY

Dismantling Information

June 1, 2005

**BIG SANDY AEP POWER PLANT
CONCEPTUAL DEMOLITION PLAN**

DEFINITIONS:

RACM (estimated 3,000 cubic yards)

Regulated Asbestos Containing Material as defined in 40 CFR 61, Subpart M and any other applicable Federal, State, and/or Local rules, regulations and/or ordinances.

Concrete Debris

Concrete stacks, cooling towers, and floor slabs (estimated 35,000 cubic yards)

Construction / Demolition Debris

Any solid waste resulting from the construction, remodeling, repair, or demolition of structures. Such wastes may

include, but not limited to;

roof material/drywall/ceiling tiles/fiberglass (estimated 3,500 yards)

brick (estimated 6,500 yards)

railroad ties (estimated 30,650 ties)

Contractor

The individual, partnership or corporation with which AEP Company enters into a contract to perform all of the work described in the Specification.

Contract

A purchase order placed by Purchaser and accepted by Contractor, together with this Specification and all other documents referred to in such purchase order, or a formal contract executed by Purchaser and Contractor, together with this Specification and all other documents referred to in such formal contract.

Engineer

The Engineer or his authorized representative designated by AEP Company to be assigned to this contract.

Fill Material

Material to be used to bring area to grade.

Greases

Any used or unused greases or waste containing grease.

Hazardous Waste

Hazardous waste as defined in 40 CFR 261.3 or as defined in any applicable state regulation.

HAZMATs

Any hazardous, toxic or regulated substance controlled under RCRA, CERCLA or any other Federal, State, or Local law, statute, regulation or ordinance pertaining to the handling, transportation, or disposal of any controlled substance.

Landfill

River City Disposal
1837 River Cities Drive
Ashland, KY 41102

MSDS

Material Safety Data Sheet.

Non-Ferrous Scrap (estimated 290,000 lbs)

All non-ferrous scrap such as copper or brass (estimated 290,000 lbs).

Oils (estimated 50,000 gallons)

Any used or unused hydraulic, lubrication, rolling, waste or other such oil or oily waste.

OSHA

Occupational Safety and Health Act and amendments thereto.

PCBs

Polychlorinated By-phenols (plant personnel verified that there are no PCB's present at the site).

Process Materials

Any raw materials, blended raw materials, recyclable process generated dusts (such as flue dust), fly ash, ash slurry and etc.

SCR Unit

Selective Catalytic Reduction Unit

Scrap Ferrous (estimated 22,000 tons)

All ferrous scrap designated by the Engineer to be suitable for melting at a steel processing plant.

Structural Removal

As in the Specification, shall mean all work of every nature described herein, implied herein, or necessary to complete the work described or implied herein, with the exception of Asbestos Abatement.

AEP Company

American Electric Power Company

**American Electric Power Company
Big Sandy Power
LOUISA, KY**

Information Sheets

Dismantling Information

June 1, 2005

BIG SANDY POWER

1. GENERAL SCOPE OF WORK

- 1.1. The work to be performed under the terms of this specification shall consist of the dismantling and removal of all facilities, machinery, equipment, all associated structures, foundations, debris, asbestos containing materials, hazardous substances and hazardous waste as directed by the Engineer. Upon completion each dismantling site shall be left in a neat, clean, safe condition.
- 1.2. Work under this specification shall be performed in accordance with the terms and conditions of the Contract, entered into between AEP Company and the Contractor, and in accordance with all EPA, OSHA, Federal, State, County, and Local laws, statutes, ordinances, and regulations.
- 1.3. The Contractor shall perform all utility disconnection and/or relocation work which is necessary to complete the proposed dismantling and removal work, without disrupting active utilities.
- 1.4. The Contractor shall perform all excavation, back-filling, construction and closure work which is necessary to complete the proposed dismantling work.
- 1.5. The Contractor shall provide all labor, materials, equipment, services and pay all necessary taxes, in addition to securing all required permits, to perform the dismantling.
- 1.6. The Contractor is responsible to clean up and dispose of any and all materials which are generated as a result of a spill caused by the Contractor, or which are generated as a result of the improper handling of any materials by the Contractor. This includes all RACM, Hazardous Substances, Hazardous Waste, Special wastes, Non-process Debris, Demolition Debris, and combustible materials.

2. FACILITY DISMANTLEMENT AND RELATED WORK

- 2.1. Perform the environment abatement of the following:
 - 2.1.1. Vacuum, transport and dispose of dust accumulations inside area of Unit 1 Boiler
 - 2.1.2. HAZMAT sweep of structures, tanks and pipe in Unit 1 Boiler area
 - 2.1.3. Abate tank insulation in Unit 1 Boiler along with all connected pipes
 - 2.1.4. Abate Unit 1 Boiler, boiler breeching and piping
 - 2.1.5. Abate Unit 1 Boiler building siding, office and turbine building siding, Unit 1 coil conveyor, Unit 1

- coil conveyor transfer building, Unit 1 train coal unload station house and miscellaneous outside structures.
- 2.1.6. Remove Units 1 fluorescent light bulbs, PCB ballast, mercury vapor light, HID vapor lights and mercury containing instruments.
 - 2.1.7. Vacuum, transport and dispose of dust accumulations inside area of Unit 2 Boiler
 - 2.1.8. HAZMAT sweep of structures, tanks and pipe in Unit 2 Boiler area
 - 2.1.9. Abate tank insulation in Unit 2 Boiler along with all connected pipes
 - 2.1.10. Abate Unit 2 Boiler, boiler breeching and piping
 - 2.1.11. Abate Unit 2 miscellaneous outside structures.
 - 2.1.12. Remove Unit 2 fluorescent light bulbs, PCB ballast, mercury vapor light, HID vapor lights and mercury containing instruments.
 - 2.1.13. Remove office, storage and maintenance building fluorescent light bulbs, PCB ballast, mercury vapor light, HID vapor lights and mercury containing instruments.
 - 2.1.14. Remove the secondary and primary river water pump house building fluorescent light bulbs, PCB ballast, mercury vapor light, HID vapor lights and mercury containing instruments.
- 2.2. Perform the building dismantling, equipment removal, concrete removal to surrounding grade elevation of the following.
- 2.2.1. Unit 1 boiler building, turbine generator building, precipitators, office and maintenance building, coal conveyor.
 - 2.2.2. Unit 2 boiler building, turbine generator building, precipitators, office and maintenance building the chemical lab building, coal conveyor to Unit 2 coal pile, the SCR building and the Unit 1 & 2 concrete smoke stack.
- 2.3. Perform the removal of the following to grade elevation.
- 2.3.1. Unit 1 water cooling tower structure, adjacent pump structures, adjacent condensate water tank to surround grade elevation. Fill the pits and trenches to surround grade elevation.
 - 2.3.2. The pump house and metal cleaning waste treatment tank located west of Unit 1 boiler building.
 - 2.3.3. The coal train car unload building, adjacent control building, the coal conveyor and coal transfer and sampling building.
 - 2.3.4. The tractor shed and locomotive house building.
 - 2.3.5. The remains of the standby river water make-up equipment, railroad ties and pipes to the Big Sandy River.
 - 2.3.6. The in-service sanitary treatment equipment, trenches and tanks located adjacent to the Big Sandy River.
 - 2.3.7. The secondary and primary river water pump building structures, the two electrical control buildings. Remove building and water intakes to surrounding grade elevation. Install a barricade in the water inlet from the Big Sandy River. Remove the water inlet screens from the river.
 - 2.3.8. The ammonia storage building and chemical manufacturing building structure and ammonia storage tank structures.
 - 2.3.9. The 500,000 gallon fuel oil tank and oil pump station. Remove the oil tank dike down to surround

grade elevation.

- 2.3.10. The six single story maintenance, storage and office buildings located south of the Unit 2 boiler building.
- 2.3.11. The Unit 2 water cooling tower structure, adjacent pump structures, adjacent clean condensate water tank, dirty condensate water tank, the fire water control building, the sulfuric acid storage and control building, the chlorine tank and control building to surround grade elevation. Fill the pits and trenches to surround grade elevation.
- 2.3.12. The Unit 2 coal conveyor from the coil pile to the Unit 2 boiler.
- 2.3.13. The coal train unload building, coal conveyor from the unload building to the coal transfer building to the coal storage area. Remove all bents and transfer building to surround grade elevation. Remove the coal truck unload equipment from grade elevation to the bottom of the pit. Fill the truck unload pit and the coal train unload pit to surrounding grade elevation. Fill the pit from the coal train station to the coal conveyor exit with fill material to surround grade elevation.
- 2.3.14. The coal system sample building, trailer and sample equipment to surrounding grade elevation.
- 2.3.15. The coal system transportation office and maintenance building located east of the coal storage area.
- 2.3.16. The two truck scales, control building, and coal train car warming structure and equipment down to surrounding grade elevation.
- 2.3.17. The abandoned 3,400,000 gallon fuel storage tank. Remove the dike wall surrounding the fuel tank to surrounding grade elevation. Remove all pumps, pipe, wires, and controls from the tank area to the Unit 2 boiler structure.
- 2.3.18. Remove the maintenance parts storage building located north of the Unit 2 turbine building.
- 2.3.19. Remove the electrical wire, and electric towers from the transformers located adjacent to Unit 2 boiler building to the 345,000 volt electrical station located north of Highway 23.
- 2.3.20. Remove the electrical wires and electrical tower from the transformers located adjacent to Unit 1 boiler building to the 134,000 volt electrical station. Remove the four step-down transformers and connections between the 134,000 volt switch yard and the block building. Remove the block building down to surrounding grade elevation.

3. WORK BY CONTRACTOR

The Contractor Shall:

- 3.1. Furnish all supervision, labor, materials, tools, supplies and equipment necessary to perform the work, including dismantling and removal of all the facilities, equipment, structures, etc. noted herein with the exception of specific structures which are designated in this Specification to remain.
- 3.2. Furnish on the site, during the performance of the work, an experienced supervisor who shall be duly authorized to represent and act for the Contractor in all matters pertaining to the work covered by this Specification.
- 3.3. Provide all written instructions, orders, and other communications delivered to the Contractor's construction office shall be considered as having been delivered to the Contractor himself.
- 3.4. Develop detailed written demolition plans for each area to be dismantled, and submit them to the Engineer for his review prior to the start of work in an area. Such plans shall include, but limited to:
 - 3.4.1. A detailed and complete schedule for the performance of the work.

- 3.4.2. A survey of each area, identifying all materials to be disposed of other than scrap and equipment.
- 3.4.3. Identification and protection of demolition areas.
- 3.4.4. Termination and/or relocation of utilities.
- 3.4.5. Asbestos abatement and disposal.
- 3.4.6. Handling and disposal of hazardous wastes and materials.
- 3.4.7. Handling and disposal of oils and greases.
- 3.4.8. Handling and disposal of non-hazardous debris and materials.
- 3.4.9. Handling and disposal of ODC's.
- 3.4.10. Fire prevention and protection.
- 3.4.11. Handling and storage locations for ferrous and non-ferrous scrap.
- 3.4.12. Method of demolition and/or equipment removal.
- 3.4.13. Clean-out, breaking open, and filling of basements, pits, and tunnels.
- 3.4.14. Final grading and restoration of demolition site.
- 3.5. Clear each site of existing equipment, structures, and material designated to be removed. Each site will be left in a neat, clean, safe condition in conformity with all applicable Federal, State, or Local laws, statutes and/or regulations, including but not limited to CAA, OSHA, RCRA, SARA, TSCA, and/or CERCLA. The finished condition of each site will be approved by the Engineer.
- 3.6. Remove all structures down to final grade except where otherwise noted. Final grade will generally be the adjacent grade surrounding the facility to be removed. The removal of concrete & debris and grading will be done concurrent with the demolition work. As one area is cleared of structures, the required concrete removal work in that area will be done simultaneously with the demolition of structures in the next area of work. If the Contractor breaches the provisions of this section AEP Company reserves the right, in AEP Company's sole opinion, to stop the Contractor from doing further demolition until the concrete and debris removal is current.
- 3.7. Perform all material removal and asbestos abatement work in accordance with all applicable Federal, State, and/or Local rules, regulations and/or ordinances, which is necessary to complete the proposed removal work.
- 3.8. Perform all utility, telecommunications and telemetering disconnection and/or relocation work which is necessary to complete the proposed removal work.
- 3.9. Prior to beginning demolition of any facility, Contractor shall ascertain that no live utilities remain in the facility and identify and locate all underground utilities. It shall be the Contractor's exclusive responsibility to determine that all utility systems in each area remain isolated from active utility systems.
- 3.10. Perform all excavation, back-filling, construction and closure work which is necessary to complete the proposed dismantling and removal work.
- 3.11. Remove all debris generated as a result of the proposed removal work.
- 3.12. Break the floors of all pits, trenches and depressions sufficiently to provide drainage and to prevent the accumulation of water within the underground structure.
- 3.13. Tunnel and basement roof structures which do not support structures designated to remain and which are located less than 3 feet below finish grade elevation will be broken in. Said tunnel excavations will be filled with fill materials approved by the Site Engineer up to finish grade elevation.
- 3.14. Properly drain and capture all contents of pipelines prior to dismantling any pipelines.

- 3.15. Empty and shovel clean all pits, sumps, basements, and depressions to the satisfaction of the Engineer. Areas will be inspected by the Site Engineer prior to filling. Any pits, sumps, basements or depressions in contact with a hazardous waste or PCB shall be decontaminated in accordance with any applicable Federal and/or State rules and/or regulations.
- 3.16. Back-fill all pits, sumps, and depressions up to existing grade. Each site shall be rough graded and left in a neat, clean, safe condition. Contractor will use fill material approved by the Engineer. The final six inches of fill shall be other select fill material approved by the Engineer.
- 3.17. Furnish all fill material in accordance with the Specification. If the work activity generates more fill material than needed, the Contractor shall pay for the transportation and disposal off site. If the work activity is fill negative, the Contractor shall pay for the purchase and transportation of required fill to the site. Such purchased material shall be approved by the Site Engineer.
- 3.18. Furnish portable sanitary facilities and drinking water for Contractor's personnel in areas of removal.
- 3.19. Furnish electric power and temporary lighting in those areas of removal where active utilities are not available.
- 3.20. Provide adequate protective barriers for open pits, holes and depressions, as a result of the equipment removal work, until they are properly backfilled. Temporary barricades shall conform to all applicable Federal, State and Local, rules and regulations or standards including, but not limited to OSHA.
- 3.21. Remove above ground utility support systems such as poles, structural steel towers or guy wires which have been designated to be removed by the Engineer.
- 3.22. Remove and scrap all tanks, including supporting steel and concrete structures. Prior to removal work Contractor shall remove the contents of each tank, drain each tank and otherwise purge each tank in accordance with all applicable rules or regulations to render them safe for removal. Notify Engineer of any potentially contaminated soils. Remove of these tanks shall conform to all applicable Federal, State, and Local laws, statutes, regulations or ordinances.
- 3.23. Secure the approval of local Fire Department for the Fire Prevention Plan. Contractor shall meet with representatives of the Fire Department prior to commencement of work on each facility. Prior to the commencement of removal work, Contractor shall inspect all fire hydrants in the work area and shall notify the Engineer of those that are not in good operating condition.
- 3.24. Provide fire extinguishers and fire hoses as required to immediately control any fires resulting from the work. Implement all fire prevention measures as directed by the Fire Department. Measures required by Fire Department may include, but will not be limited to, the maintenance of pressurized fire hoses at each removal site.
- 3.25. Attend a safety meeting with AEP Company's representatives prior to starting work in each facility or designed area.
- 3.26. Furnish all temporary or permanent supports or protective devices which are necessary to preserve active pipes, electrical lines or other structures which AEP Company designates to remain in place.
- 3.27. Abide by AEP Company Contractor Safety Responsibilities, AEP Company Energy Control-Lockout and Tryout Rules, as well as all Federal, State, and Local regulations.
- 3.28. Secure the Engineer's approval prior to using any railroad track or mobile crane movements to or from the dismantling site.
- 3.29. Schedule rail movements, order all railroad cars and be solely responsible for demurrage charges resulting from the Contractor's operations.
- 3.30. Where Contractor removes railroad track, the Contractor shall remove all wooden and concrete ties, and load

and transport them to an approved disposal site approved by the Engineer. Contractor shall be responsible for the cost of all removal, loading, transportation, and disposal of such material.

3.31. ACM ABATEMENT

- 3.31.1. Contractor shall provide all supervision, labor, consumable materials, tools, equipment, documentation, services and permits required to identify, remove, and dispose of all ACM located on, in, adjacent to or forming a part of each structure designated for removal. RACM removal work shall include but is not necessarily limited to the work described herein.
- 3.31.2. Prepare a complete, written ACM removal plan for each dismantling site. Contractor shall obtain and analyze all bulk sample analyses of any suspect RACM. Prior to the commencement of work, Contractor shall provide the Engineer with the results of the analyses and Contractor's removal plan.
- 3.31.3. Provide all respirators, protective clothing and equipment required to protect all personnel associated with the RACM removal work. All respirators, protective clothing and equipment shall conform to all applicable rules, regulations, and standards, including but not limited to OSHA..
- 3.31.4. Employ only competent persons, trained, knowledgeable and qualified in the techniques of abatement, handling and disposal of RACM and subsequent cleaning of contaminated areas. Employees who perform RACM removal work shall possess current, valid asbestos abatement licenses as required by any governmental agency having jurisdiction over the work.
- 3.31.5. Perform all RACM removal in strict accordance with all applicable Federal, State, and Local laws, statutes, ordinances and regulations. Contractor shall provide timely and accurate notification in accordance with all Federal, State, and Local laws, statutes, and regulations and ordinances.
- 3.31.6. Adequately wet all friable RACM prior to removal. Adequately wet RACM debris shall be packaged in bags provided by Contractor. Bags of ACM debris shall promptly be placed in dumpster boxes provided by Contractor.
- 3.31.7. Haul all RACM debris from each RACM removal site to the disposal site approved by AEP Company. Contractor shall unload RACM at the disposal site. All transportation of RACM shall be performed in enclosed dumpster boxes.
- 3.31.8. Be responsible for any spilling, escape or release of RACM which occurs during the transportation of RACM to the disposal site. AEP Company shall be responsible for any spilling, escape or release of RACM which occurs after the RACM has been unloaded by Contractor at the disposal site approved by AEP Company. Contractor shall immediately report to AEP Company any spilling, escape or release of RACM which occurs during the transportation of RACM. Contractor shall submit copies of reports of spilling, escape or release of RACM to all authorities as required by Federal, State or Local laws, statutes, regulations and ordinances.
- 3.31.9. Maintain complete and accurate records of all removal, transportation and disposal activities in accordance with all Federal, State and Local laws, statutes, regulations and ordinances. Contractor shall submit copies of all such records to AEP Company on a daily basis.
- 3.31.10. Perform personal and area air monitoring as necessary to assure the safety of all persons associated with the removal of ACM and as required by Federal, State and Local laws, statutes, regulations and ordinances. Contractor shall perform environmental air monitoring in the area at each location where RACM removal work is performed. Environmental air monitoring shall conform to all applicable Federal, State, and Local laws, statutes, regulations and ordinances.

3.32. HAZARDOUS WASTE HANDLING AND DISPOSAL

- 3.32.1. Contractor shall provide all supervision, labor, consumable materials, tools, equipment,

documentation, services and permits required to identify, remove and load any hazardous waste located in, adjacent to or forming a part of the equipment designated for removal. Contractor shall be responsible to perform all in-plant handling of such materials, including, but not limited to removal, loading, and in-plant transportation. Hazardous waste removal work shall include, but is not necessarily limited to, the work described herein.

- 3.32.2. Contractor is required to secure samples of all materials, which are suspected of being a hazardous waste, located in the areas defined in this Specification. Samples shall be collected in accordance with all applicable regulations. Contractor shall deliver all samples of suspected hazardous waste to the Engineer. AEP Company shall secure required analyses of all such samples.
- 3.32.3. Prepare a complete written hazardous waste removal plan for each work site that will be submitted to the Engineer for his review prior to the start of work in an area.
- 3.32.4. Contractor shall provide all respirators, protective clothing and equipment required to protect all personnel associated with the handling or removal of any Hazardous Wastes. All said respirators, protective clothing and equipment shall conform to all applicable rules, regulations and standards, including but not limited to OSHA.
- 3.32.5. Employ only competent persons, trained, knowledgeable and qualified in the techniques of handling and disposal of hazardous wastes and subsequent cleaning of contaminated areas. Employees who perform hazardous waste removal work shall possess current, valid licenses as required by any government agency having jurisdiction over the work. Perform all hazardous waste removal in strict accordance with all applicable Federal, State and Local laws, statutes, ordinances and regulations. Contractor shall provide timely and accurate notification in accordance with all Federal, State and Local laws, statutes, regulations and ordinances.
- 3.32.6. Contractor shall post all appropriate warning signs at each work area, as is required by applicable regulations.
- 3.32.7. Maintain complete and accurate records of all removal activities in accordance with all Federal, State, and Local laws, statutes, regulations and ordinances. Contractor shall submit copies of all such records to AEP Company on a weekly basis.
- 3.32.8. Perform personal monitoring as necessary to assure the safety of all persons associated with the removal of hazardous wastes and as required by Federal, State, and Local laws, statutes, regulations and ordinances. If so required, Contractor shall perform environmental air monitoring in the area of each location where hazardous waste removal work is performed. Environmental air monitoring shall comply with applicable Federal, State, and Local laws, statutes, regulations and ordinances.
- 3.32.9. AEP Company shall be responsible for disposal, the method of disposal and the disposal site for all identified hazardous waste except asbestos waste. Contractor shall load all such wastes into trucks or containers provided by AEP Company.

3.33. CONSTRUCTION / DEMOLITION WASTE

- 3.33.1. Contractor is required to perform the work described herein in a manner that will separate construction / demolition waste from ferrous scrap, combustible waste, non-ferrous scrap, ferrous scrap, process demolition waste, oils and greases, hazardous wastes, and all other materials.
- 3.33.2. Contractor shall identify all quantities of construction / demolition waste to the Engineer. The Engineer shall positively identify all such materials as being construction / demolition waste.
- 3.33.3. For all materials which have been positively identified by the Engineer as construction / demolition waste, Contractor shall use such materials as clean fill in locations approved for filling by the Engineer.

- 3.33.4. Contractor shall be responsible to perform all in-plant handling of such materials, including, but not limited to, screening, separation, from other materials, loading, crushing and transportation.
- 3.33.5. Contractor shall be responsible for any costs that are incurred as a result of his handling construction / demolition waste, including, but not limited to, sampling, analysis, permit applications, loading, on and off-site transportation, and disposal at an approved disposal site.

3.34. OILS

- 3.34.1. Contractor is required to secure samples of all oils and oily wastes located in the areas defined in this Specification. Samples shall be collected in accordance with all applicable regulations.
- 3.34.2. AEP Company shall secure analyses required by the applicable regulations, or by the disposal facility, of all such samples, including, but not limited to, analysis for PCB contamination.
- 3.34.3. For all oils which have been positively identified as being free of PCB contamination (i.e. less than 50 ppm), Contractor shall be responsible to perform all handling of such materials, including, but not limited to, removal, clean up, loading and transportation.
- 3.34.4. Contractor shall be responsible to pay for fees to dispose of all oils and oily waste in accordance with all applicable regulations. The Engineer shall approve all methods of disposal and disposal sites for all oils and oily waste.

3.35. GREASES

- 3.35.1. Contractor is required to secure samples of all greases and wastes containing grease located in the areas defined in this Specification. Samples shall be collected in accordance with all applicable regulations.
- 3.35.2. AEP Company shall secure analyses required by the applicable regulations, or by the disposal facility, of all such samples.
- 3.35.3. Contractor shall be responsible to perform all handling of such materials, including, but not limited to, removal, clean up, loading, and transportation.
- 3.35.4. AEP Company shall be responsible for the disposal of all special and hazardous greases and waste containing greases in accordance with all applicable regulations.

3.36. PROCESS MATERIALS

- 3.36.1. Contractor is required to perform the work described herein in a manner that will separate process demolition debris from ferrous scrap, combustible debris, non-ferrous scrap, construction / demolition waste, oils and greases, hazardous wastes, and all other materials.
- 3.36.2. Prior to the start of demolition in an area, Contractor shall identify all quantities of process materials to the Engineer. The Engineer shall positively identify all such materials as being process materials.
- 3.36.3. All ash process materials will remain on-site. A two foot clay cap will be utilized to cap process material areas of concern.

3.37. PCBs AND EQUIPMENT CONTAINING PCBs

- 3.37.1. Prior to dismantling, Contractor shall conduct a survey of each dismantling area to locate and identify any electrical or hydraulic equipment which has not been clearly identified as being free of PCB contamination and, therefore, may contain PCBs. Contractor shall provide the Engineer with the location and description of any surveyed equipment which may contain PCBs. Where so directed by AEP Company, Contractor shall provide AEP Company with a sample of the oil contained in the piece of equipment. AEP Company will secure analysis and provide Contractor with the written results.

3.37.2. Prior to dismantling the facility, the Contractor shall remove, intact each piece of PCB contaminated equipment. Contractor shall transport said PCB equipment to AEP Company's designated PCB storage facility. Contractor shall schedule and coordinate said deliveries with the Engineer. Alternatively, at the direction of the Engineer, Contractor shall load PCB equipment onto vehicles provided by AEP Company. Contractor shall schedule and coordinate said loading with the Engineer. Contractor shall schedule and coordinate the pumping and removal of PCB dielectric fluid from transformers prior to loading when so directed by the Engineer.

3.37.3. AEP Company shall be responsible for the disposal of all PCB equipment and fluids.

3.38. PIPING SYSTEMS

3.38.1. Prior to the commencement of dismantling work, Contractor shall identify, plan and perform all piping shut offs, disconnections, and relocation work necessary to complete the work specified in a safe, orderly manner.

3.38.2. Piping shall be purged (where necessary) and shall be removed to a point of origin as designated by the Engineer.

3.38.3. Contractor shall submit plans, procedures and working drawings showing design details for all piping work to the Engineer for review. Contractor shall secure the Engineer's review of all designs, plans and procedures prior to the commencement of work. The correctness of the design shall remain the Contractor's responsibility.

3.38.4. Contractor shall provide all supervision, labor, materials, tools and equipment necessary to complete all piping work required for the work as specified herein. Contractor shall be responsible for the identification of all piping construction, disconnection and relocation work which will be required to complete all work specified herein.

3.38.5. Contractor shall perform all piping construction, disconnection and relocation work using methods which will not interrupt AEP Company's ongoing operations.

3.38.6. Secure the Engineer's permission prior to any utility outage. In the absence of the Engineer's approval of Contractor's proposed outage, Contractor shall perform the proposed work on live pressurized lines.

3.39. ELECTRICAL SYSTEMS

3.39.1. Prior to the commencement of dismantling work, Contractor shall identify, plan and perform all electrical shut offs, disconnections, and relocation work necessary to complete the work specified in a safe and orderly manner.

3.39.2. Conduit, cable, wireways, and buss shall be removed to a point of origin as designated by the Engineer.

3.39.3. Contractor shall submit plans, procedures and working drawings showing design details for all electrical and related work to the Engineer for review. Contractor shall secure the Engineer's review of all designs prior to the commencement of work. The correctness of design shall remain the Contractor's responsibility.

3.39.4. Contractor shall provide all supervision, labor, materials, tools and equipment necessary to complete all electrical, telecommunication and telemetering work required for the dismantling work specified herein. Contractor shall be responsible for the identification of all electrical, telecommunication and telemetering construction, disconnection and relocation work which will be required to complete all work specified herein.

3.39.5. Contractor shall perform all electrical construction, disconnection and relocation work using methods

which will not interrupt AEP Company's ongoing operations.

3.39.6. Contractor shall secure the Engineer's permission prior to any utility outage. In the absence of the Engineer's approval of Contractor's proposed outage, Contractor shall perform the proposed work on live energized lines.

4. WORK BY PURCHASER:

AEP Company Shall:

- 4.1. Provide Material Safety Data Sheets (MSDS) in accordance with OSHA "Right to Know" regulations for each substance listed under said regulations.
- 4.2. Provide, where available, utility services such as 460 Volt, 3 phase, 60 Hz power, 250 Volt DC current, potable water, oxygen, compressed air, or natural gas, which are deemed available by AEP Company. Contractor may, at his own expense and approval of the Engineer, make necessary connections provided there is no interruption to normal production operations. AEP Company assumes no responsibility or liability for loss of, or damage to, the equipment or materials of the Contractor or his subcontractors. Contractor will pay charges that may be assessed. The assessment of charges and/or the availability of utilities may change through the course of the contract as determined.
- 4.3. Provide existing railroad tracks, railroad tracks sidings, and roadways on plant site, if available, for Contractor's use when and where the Engineer may designate. Contractor shall keep traffic lanes free of congestion so as to avoid interference with normal plant operations.
- 4.4. Provide one copy of all available drawings necessary for the completion of the work specified. These drawings are to be used by the Contractor for reference only in the performance of the work. Said drawings are not to be construed as a complete description of the Scope of Work, nor as fully depicting existing conditions. Additional copies may be purchased by Contractor through the Purchaser.
- 4.5. Approve the selection of all subcontractors before they will be allowed to enter the job site and perform work. Subcontractors are subject to all applicable terms and conditions contained herein.
- 4.6. Provide written releases for the demolition of each specific area or facility as identified in the Schedule of Values. Demolition shall not commence without the receipt of said release.
- 4.7. Assign to Contractor ownership of each facility to be dismantled. The assignment shall include:
 - 4.7.1. All ferrous and non-ferrous scrap resulting from the dismantling work
 - 4.7.2. All ferrous and non-ferrous scrap located within each dismantling area as identified by Engineer during the site visitation.
 - 4.7.3. Spare parts and/or spare equipment.
 - 4.7.4. All railroad track designated for removal.
 - 4.7.5. All vehicles and mobile equipment located within each dismantling area as identified in the Specification.
- 4.8. AEP Company will maintain ownership of all real estate

5. Pricing

- 5.1. Demolition and environmental abatement of Unit 1, 2, structures, equipment, cooling towers, stacks, buildings, railroad tracks and tanks
\$12,000,000
- 5.2. Removal of piping, dewatering and capping of bottom and slurry ash ponds
\$20,000,000

Assumptions

This estimate is based on all roadways, concrete slabs, and foundations remaining in place.

This estimate is based on AEP providing an on-site clay source for the capping of the ash ponds.

This estimate is based on treating and disposal of all water to either the ground or into the river system.

This estimate is based on dewatering 150 acres at 3 feet deep.

This estimate is based on capping a 150 acre site.

This estimate does not include any survey work to establish grades.

This estimate is based on preserving all storm water sewers to the Big Sandy River.

This estimate is based on saving the two electrical sub-stations located on the AEP property.

This estimate is based on disposing all concrete and brick material at the ash slurry ponds.

This proposal does not include any PCB oil and/or equipment disposal.

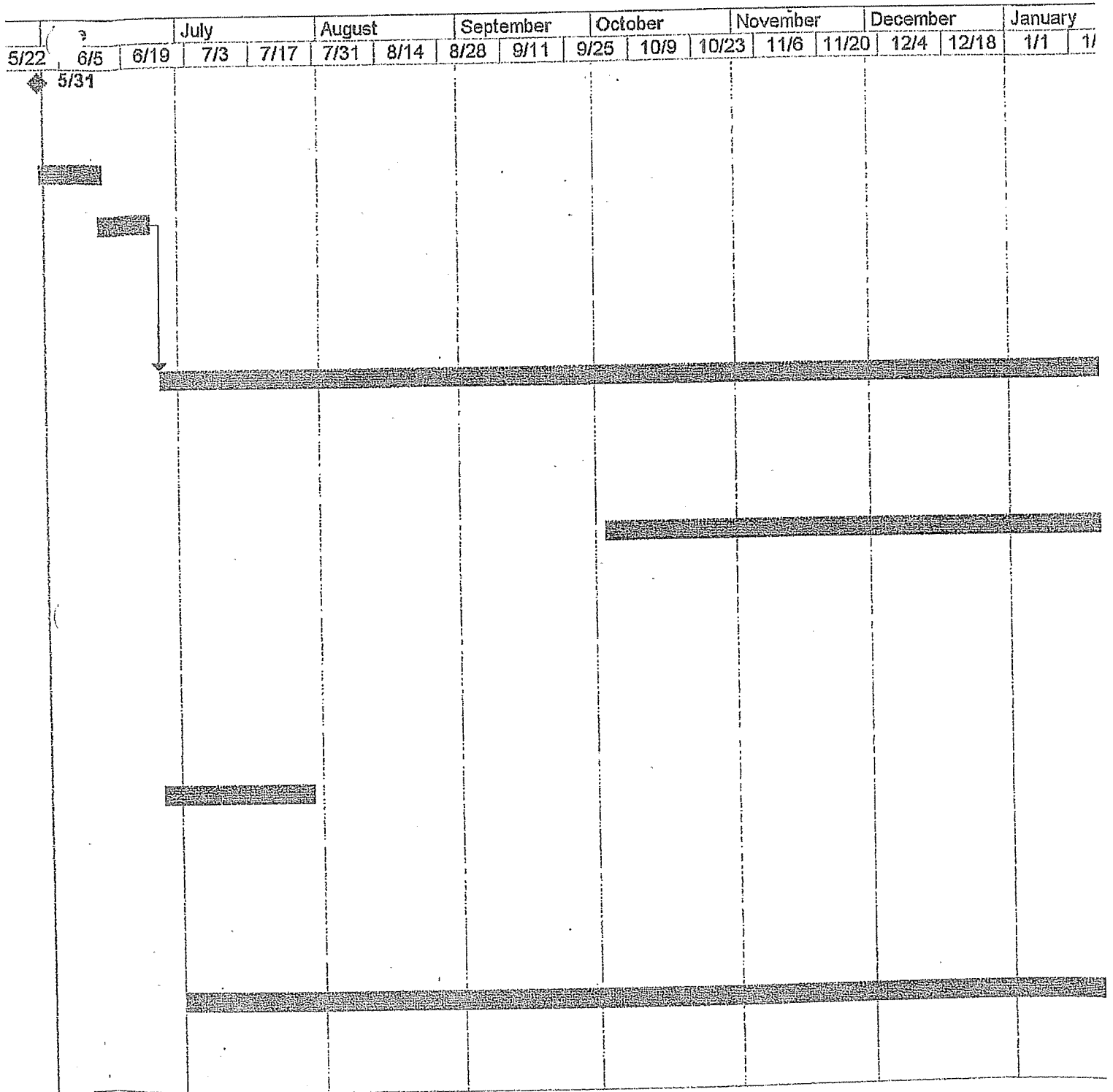
This proposal is based on Brandenburg receiving ownership of all ferrous and non-ferrous scrap.

This proposal does not include any site security.

This proposal is based on Pittsburgh ferrous and non-ferrous pricing from the December 29, 2004 American Metal Market publication minus transportation and preparation.

AEP Company
 Big Sandy River Power Plant
 Louisa, Kentucky

ID	Icon	Text1	Task Name	Duration	Start	5/22		Jur
1		General Conditions		0 days	Tue 5/31/05			5/
2			meetings	10 days	Tue 5/31/05			
3	HE		mobilization	10 days	Mon 6/13/05			
4			demobilization	10 days	Mon 8/6/07			
5								
6			Unit 1 environmental abatement	150 days	Mon 6/27/05			
7	HE		demolition	40 days	Mon 1/23/06			
8								
9	HE		Unit 2 environmental abatement	175 days	Mon 10/3/05			
10			demolition	50 days	Mon 6/5/06			
11								
12	HE		SCR demolition	20 days	Mon 7/10/06			
13								
14	HE		Support Bldgs demolition	25 days	Mon 6/27/05			
15								
16		Stack & Cooling Towers	demolition	120 days	Mon 8/7/06			
17								
18	HE	Slurry Ash/Bottom Ash Pits	dewater	260 days	Fri 7/1/05			
19	HE		grade/place cap	220 days	Mon 10/2/06			



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Brandenburg.

Methodology

General Project Consistent Activities

The following details Brandenburg's methodology in order to complete the scope of work safely and in a cost effective manner for the decontamination and demolition of the AEP Big Sandy Power Plant.

Mobilization will include bringing equipment on-site, set-up of hydraulic excavators, loaders, unloading of manlifts, bobcats, portable decontamination trailer, job tool and supply box, and the job office/break box.

Brandenburg will conduct a utility verification walk through on each building and/or work area in order to substantiate that all utilities servicing the removal area have been cut, capped, and / or air-gapped prior to proceeding with the removal efforts. During this verification, the color coding of all structures, buildings and tanks will also be verified as painted green and ready for removal. This task will be followed by environmental work including; gathering, staging and packaging of any loose chemicals and/or oils remaining in the buildings, removal of light bulbs and ballasts and followed by asbestos abatement. Once these tasks are complete, Brandenburg will perform a final walk through and complete a facility assessment report that signs off that the utility disconnection/isolation work, the environmental decommissioning and abatement work are complete and the building or structure is ready for demolition. Brandenburg will request the AEP representative to verify this facility assessment and sign the assessment form that concurrence is given to perform the demolition. Brandenburg will install geo-textile fabric over catch basins and / or sewer inlets within the demolition areas scheduled to remain in order to keep material from flowing into the existing system during the removal efforts. Following this preparatory work, the buildings and structures will be demolished.

Work specific to each Building or Structure is discussed below.

Boiler Units 1 and 2

Barricades consisting of snow fence and caution or danger tape will be placed at entry areas of the building to limit access into the building. Barricade tags obtained through the AEP representative will be complete and attached to the barricade fencing at points of egress.

Brandenburg crews will next "sweep" the units looking for loose chemical containers and remove, stage and package the materials to ready them for disposal. All light bulbs, light ballasts, and self-illuminating exit signs will then be taken down, packaged and staged. Brandenburg crews will access the lights within the units off of A-frame step ladders, lights and ballasts will be carefully removed by hand and through the use of small hand tools as necessary. Manlifts may be used if lights or other regulated materials are present at elevations higher than safely accessible with the ladders. Generally the crew will work in pairs with one person working on the ladder and a ground person retrieving the bulb or ballast after removal to place in a storage container.

Brandenburg shall utilize trained Kentucky licensed asbestos abatement personnel to perform asbestos remediation throughout the structures. Brandenburg shall conform to all state and federal regulations during the abatement efforts.

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General Practices

Regulated Areas

All Class I, II asbestos work will be conducted within regulated areas.

Access to the regulated area shall be limited to authorized persons.

Demarcation

Warning signs that demarcate the regulated area will be provided and displayed at each location where a regulated area is required to be established. The warning signs shall bear the following information: Danger, Asbestos, Cancer and Lung Disease Hazard, Authorized Personnel Only, Respirators and Protection Clothing Are Required In This Area.

Respiratory Selection

Brandenburg will provide at no cost to the employee the appropriate respirator as specified in Table 1 paragraph (h)(2)(iii), (iv),(v)-(h)(4)(ii) of 29 CFR 1926.1101 and maintain a respirator program in accordance with 1910.134(b), (d), (e), and (f).

Brandenburg will ensure that the employee uses the respirator as provided below.

During all Class I work.

During all Class II work where ACM is not removed in a "substantially intact state".

During all Class II work which is not performed using wet methods.

During Class II work where a "negative exposure assessment" has not been prepared.

During any work where exposure occurs above the PEL or excursion limit.

Brandenburg will provide and require the use of an approved half-face air purifying respirator for Class II jobs where a negative exposure assessment has not been performed.

Protective Clothing

Brandenburg will provide and require the use of protective clothing, such as Tyvek coveralls, head coverings, gloves and foot coverings for all employees performing abatement activities. The competent person will examine work suits worn by employees at least once per work shift for rips or tears that may occur during performance of work and will mend or replace work suits immediately if needed.

Hygiene Facilities and Practices

Will be provided and performed as required in section (j) of 29 CFR 1926.110.

Engineering Controls

HEPA vacuums will be used as needed.

Wet methods will be used.

Prompt clean up and disposal of waste in leak tight containers.

Local exhaust ventilation equipped with HEPA filters as needed.

Enclosures will be used whenever feasible.

Specific Removal

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Thermal System Insulation:

The TSI identified in the facility are the asbestos containing pipe runs, breaching, boiler insulation and tank insulation. Sections of the pipe wrap will be glove bagged to remove the asbestos insulation and expose the pipe surface. Glove bag removal will continue along the pipe runs either continuously until complete or at approximately spacing of 8-feet between glove bags. The pipe runs between the glove bagged areas will be wetted and double wrapped with 6-mil poly-sheeting and duct taped and sealed at the ends to the pipe. Once wrapped and sealed, individual sections of the pipe will be secured with ropes, the pipe torch cut and lowered to the ground. Ground men will then move the pipe to the lined and sealed roll-off box for storage. A containment using the power house existing structure will be erected to abate the boiler breaching, boiler insulation and tank insulation. ACM will be wetted, immediately double bagged and placed into roll off containers for disposal.

Vinyl Asbestos Tile and Mastic

Brandenburg shall remove asbestos containing floor tile within sealed critical areas by way of hand scrapers to "pop up" each tile. The tile removal will use wet methods during the removal work. Mastic associated with the removal of asbestos floor tile shall be accomplished utilizing a chemical adhesive remover. Said adhesive remover shall be collected, loaded, and transported to the landfill for disposal.

Window & Door Caulk

Prior to razing the structures, Brandenburg will remove windows containing asbestos caulk from the building. The windows will be wrapped in polyethylene sheeting and placed in a roll-off box for disposal as non friable asbestos. Brandenburg will then remove any remaining caulk from the structure using hand labor. Any removed window caulk will be placed in the roll off box with the windows. Polyethylene sheeting will be placed on the ground beneath all caulk removal work. Any caulk collected on the poly will be bagged and placed in the non friable asbestos roll off box. All work will be conducted using wet methods.

Transite Panels & Fire Doors

Brandenburg shall remove transite panels and fire doors by utilizing asbestos laborers to remove the panels intact. If necessary, man-lifts may be utilized to access the panels for removal. The panels and fire doors will be removed intact, wrapped in polyethylene sheeting, loaded in a lined roll-off box, and hauled to landfill for disposal.

Ceiling tiles

Ceiling tiles will be located within the building and critical areas sealed. The ceiling tiles will be removed by accessing the ceiling working off of A-frame ladders. The individual tiles will be wetted and removed intact. The removed tiles will be placed into 6-mil polyethylene asbestos

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bags. When the tile removal is complete the bags will be removed from the building and placed in a sealed and lined roll-off box for transport to the landfill for disposal.

Roofing Materials

The roofing materials identified in the survey will be removed as part of the demolition of the building. The roof will be wetted with water from fire hoses during the demolition process. Once the roofing materials are pulled to the ground the material will be loaded into Brandenburg trucks for transporting to the landfill as C&D waste material.

Following the removal of all regulated materials, Brandenburg will prepare for the demolition.

Brandenburg will use a hydraulic excavators equipped with a grapple or shear in order to raze the existing structure in a controlled manner. The building structure will be wetted with a fire hose throughout the demolition effort to control dust emissions. The building debris (C&D) will be placed in a stock pile as the building is being demolished. As the material accumulates it will be loaded via a CAT 980 wheel loader into a Brandenburg trailer and transported to the landfill for disposal. Each load will have a separate bill of lading or manifest associated with the load. These tickets will be kept in the log book at the Brandenburg office area and a concurrent log will be completed to track out going waste volumes.

The basement floor slabs will be cracked for drainage and filled. Existing grade will be determined at the perimeter of the existing structure. Removal of above grade concrete will be accomplished with the excavator equipped with a bucket, concrete processor or hydraulic breaker. Continued misting of the work area with water will be performed to control dust emissions.

Scrap steel shall be segregated, loaded, and hauled off site to a steel recycler.

Brandenburg will utilize onsite concrete as backfill material for the area affected by the removal efforts. Backfill shall be placed and rough graded to the top of the elevation of the surrounding grade.

Office/Support Buildings

Brandenburg crews will next "sweep" the building looking for loose chemical containers and remove, stage and package the materials to ready them for disposal. All light bulbs, light ballasts, and self-illuminating exit signs will then be taken down, packaged and staged. Brandenburg crews will access the lights within the building off of A-frame step ladders, lights and ballasts will be carefully removed by hand and through the use of small hand tools as necessary. Generally the crew will work in pairs with one person working on the ladder and a ground person retrieving the bulb or ballast after removal to place in a storage container.

Brandenburg shall utilize trained Kentucky licensed asbestos abatement personnel to perform asbestos remediation throughout the structures. Brandenburg shall conform to all state and federal regulations during the abatement efforts.

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General Practices

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Brandenburg will ensure that the employee uses the respirator as provided below.

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During all Class II work where ACM is not removed in a "substantially intact state".

During all Class II work which is not performed using wet methods.

During Class II work where a "negative exposure assessment" has not been prepared.

During any work where exposure occurs above the PEL or excursion limit.

Brandenburg will provide and require the use of an approved half-face air purifying respirator for Class II jobs where a negative exposure assessment has not been performed.

Protective Clothing

Brandenburg will provide and require the use of protective clothing, such as Tyvek coveralls, head coverings, gloves and foot coverings for all employees performing abatement activities. The competent person will examine work suits worn by employees at least once per work shift for rips or tears that may occur during performance of work and will mend or replace work suits immediately if needed

Hygiene Facilities and Practices

Will be provided and performed as required in section (j) of 29 CFR 1926.110.

Engineering Controls

HEPA vacuums will be used as needed.

Wet methods will be used.

Prompt clean up and disposal of waste in leak tight containers.

Local exhaust ventilation equipped with HEPA filters as needed.

Enclosures will be used whenever feasible.

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Thermal system Insulation:

The TSI identified in the facility are the asbestos containing pipe runs. Sections of the pipe wrap will be glove bagged to remove the asbestos insulation and expose the pipe surface. Glove bag removal will continue along the pipe runs either continuously until complete or at approximately spacing of 8-feet between glove bags. The pipe runs between the glove bagged areas will wetted and then double wrapped with 6-mil poly-sheeting and duct taped and sealed at the ends to the pipe. Once wrapped and sealed, individual sections of the pipe will be secured with ropes, the pipe torch cut and lowered to the ground. Ground men will then move the pipe to the lined and sealed roll-off box for storage.

Vinyl Asbestos Tile and Mastic

Brandenburg shall remove asbestos containing floor tile within sealed critical areas by way of hand scrapers to "pop up" each tile. The tile removal will use wet methods during the removal work. Mastic associated with the removal of asbestos floor tile shall be accomplished utilizing a chemical adhesive remover. Said adhesive remover shall be collected, loaded, and transported to the landfill for disposal.

Window & Door Caulk

Prior to razing the structures, Brandenburg will remove windows containing asbestos caulk from the building. The windows will be wrapped in polyethylene sheeting and placed in a roll-off box for disposal as non friable asbestos. Brandenburg will then remove any remaining caulk from the structure using hand labor. Any removed window caulk will be placed in the roll off box with the windows. Polyethylene sheeting will be placed on the ground beneath all caulk removal work. Any caulk collected on the poly will be bagged and placed in the non friable asbestos roll off box. All work will be conducted using wet methods.

Transite Panels & Fire Doors

Brandenburg shall remove transite panels and fire doors by utilizing asbestos laborers to remove the panels intact. If necessary, man-lifts may be utilized to access the panels for removal. The panels and fire doors will be removed intact, wrapped in polyethylene sheeting, loaded in a lined roll-off box, and hauled to the landfill for disposal.

Ceiling tiles

Ceiling tiles will be located within the building and critical areas sealed. The ceiling tiles will be removed by accessing the ceiling working off of A-frame ladders. The individual tiles will be wetted and removed intact. The removed tiles will be placed into 6-mil polyethylene asbestos bags. When the tile removal is complete the bags will be removed from the building and placed in a sealed and lined roll-off box for transport to the landfill for disposal.

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Lincoln Park, Michigan 48146-1462
Phone (313) 382-2500
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Roofing Materials

The roofing materials identified in the survey will be removed as part of the demolition of the building. The roof will be wetted with water from fire hoses during the demolition process. Once the roofing materials are pulled to the ground the material will be loaded into Brandenburg trucks for transporting to the landfill as C&D waste material.

Following the removal of all regulated materials, Brandenburg will prepare for the demolition. Brandenburg shall utilize skid steers equipped with biter buckets placed inside of the existing structure to remove the remaining combustible materials from the structure. These materials shall be removed from the building by way of an access opening within an existing exterior wall. Said opening shall be large enough for the easy ingress and egress of the skid steers operating within the structure. Once the material is outside of the existing structure, Brandenburg shall load and transport the waste to the landfill. A combination of a CAT 980 wheel loader and the Bobcat Skid Steer Loaders will be used to load the trucks.

Following, the interior strip out of the existing structure, Brandenburg shall begin the structural removal efforts. Brandenburg will utilize one or two Leibherr 954 hydraulic excavators equipped with whip hammers, hydraulic shears, grapples, and /or hydraulic hammers in order to raze the existing structure in a controlled manner. The excavating equipment will "bite" into the structure and pull the building apart.

The scrap steel material will be pulled from the building and separated from the building debris. The debris will be loaded into Brandenburg trucks for shipment to the landfill. As the building is removed, an area may be established for hot work in order to size some of the structure steel or other heavy steel. The steel will be eventually be loaded and shipped off site to a scrap steel recycler.

Brandenburg will utilize onsite concrete as backfill material for the areas affected by the removal efforts. Backfill shall be placed and rough graded to the top of the elevation of the surrounding grade.

Unit 1 and 2 Stack & Cooling Towers

Following the completion of demolition of Units 1 & 2 and all supporting building structures, tanks, conveyors and equipment, Brandenburg crews will implode the stack and (2) cooling towers.

Brandenburg crews will go through the structures performing the initial walk through to verify that the utilities have been disconnected, isolated or air gapped. Following the walk through, barricades consisting of snow fence and caution or danger tape will be placed at entry areas of the structure to limit access.

Once the concrete structures are imploded, Brandenburg will segregate the scrap steel from the concrete. The steel will be loaded and shipped off-site to a scrap recycler. The concrete will be processed to two feet or less in size and used as bridging material at the slurry ash ponds prior to capping with clay.

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Bottom Ash Ponds

Brandenburg will remove, transport and dispose of the piping from the boiler units to the ponds. Brandenburg will dewater the bottom ash ponds. The water will be filtered and discharged into the Big Sandy River. Brandenburg will then import clay from the AEP clay borough and place a two foot clay cap on any remaining bottom ash accumulations.

Slurry Ash Ponds

Brandenburg will remove, transport and dispose of the piping from the boiler units to the ponds. Brandenburg will allow the slurry ash ponds to drain naturally. Once drained, concrete from the demolition of the stack and cooling towers will be utilized to stabilize bridge the ground. The area will be graded and Brandenburg will import clay from the on-site AEP clay borough and place a two foot clay cap over the 150 acre area. Brandenburg will grade the area to allow for water to drain toward Blaine Creek.

Aboveground/Underground Storage Tanks

Brandenburg shall remove all above ground tanks, including pipe racks, supports, and appurtenances utilizing a hydraulic excavator equipped with a hydraulic shear to cut the existing piping, tank, and appurtenances. Scrap steel shall be segregated, loaded, and hauled off site to a steel recycler. Brandenburg will then remove the tank dike walls down to surrounding grade elevation or top of tank slab. The Tank Ring foundations shall remain in place.

Brandenburg will remove all below grade tanks, pumps and below grade product lines. The tanks will be emptied by conventional means. A hydraulic excavator will be used to excavate and remove the tanks. Brandenburg will utilize onsite concrete as backfill material for the areas affected by the removal efforts. Backfill shall be placed and rough graded to the top of the elevation of the surrounding grade.

Volumes

Demolition Material	Volume
Concrete	35,000 yards
Asbestos	3,000 yards
Demolition Debris	5,000 yards
Railroad Ties	30,666 ties
Brick	6,500 yards
Scrap Ferrous Steel	22,000 tons
Scrap Non-ferrous Steel	290,000 lbs
Oils/Greases	50,000 gallons

AEP Company
Re-sale of Equipment

May 31, 2005

Resalable valve of equipment

The equipment that has re-sale value are as follows:

The coal pulverizers used to pulverize the coal blown into the boiler as fuel.

The Unit 1 cooling tower water pumps and motors used to move the cooling water from the cooling tower to the turbine generator condensers.

The Unit 2 cooling tower pumps and motors used to move the cooling water from the cooling tower to the turbine generator condensers.

The three, Unit 1 step-up transformers, after the generator.

The five, Unit 2 step-up transformers, after the generator.

The four, plant step-down transformers, at the west substation yard.

The amount of money that the equipment is worth is a small amount. Because of the age of the equipment, the transformers will range in price from \$2.00 to \$4.00 per KVA. The pumps and AC motors will range around \$5.00 per horsepower. And the coal pulverizers will range in resale value of \$3,500.00 to \$5,000.00 each depending on condition and date of rebuild. The total resalable value today for equipment that is resalable is \$250,000.00.

Recommendations

Brandenburg recommends that a detailed asbestos survey be performed to determine the exact volume of asbestos present on the property.

Brandenburg recommends that instead of capping the slurry ash ponds, AEP request a variance from the State of Kentucky to maintain the area as a protected wetland/ wildlife habitat.

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KENTUCKY POWER COMPANY
DEPRECIATION STUDY AS OF 12-31-08

STEAM PRODUCTION PLANT WORKPAPERS

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KENTUCKY POWER COMPANY
Depreciation Study as of December 31, 2008
Production Plant

This investment consists of two generating units located on the Big Sandy River near Louisa, Kentucky. Unit 1 is rated at 260 MW and was placed in service in 1963. Unit 2 is rated at 800MW and was placed in service in 1969. The estimated final retirement dates for the units were provided by the Asset and Outage Planning Section of AEP's Generating Division.

Life Analysis

Interim retirements for the Big Sandy Plant were determined by analyzing past history for each of the accounts in the production plant function. Interim retirement ratios were developed based on the period 1975 through 2008. Interim retirements are not usually considered representative of the future until the generating units have experienced a few years of actual operation. Since Unit 2 was placed in-service in 1969, the period beginning in 1975 provided for five years of operational experience.

In addition to the interim retirements experienced to date, the Selective Catalytic Reduction (SCR) system that is installed at Big Sandy Plant will have the SCR Catalysts replaced at future intervals. The AEP Engineering group provided the following details for replacement of the SCR Catalysts:

Layer 1 will be replaced in year 2015
Layer 2 will be replaced in year 2016
Layer 3 will be replaced in year 2011

The original cost of the catalysts are as follows:

Layer 1	\$3,259,048
Layer 2	\$3,259,049
Layer 3	\$1,629,524

After determining the interim retirements and the retirement of the SCR catalysts, a remaining life was calculated for each of the primary production plant accounts. The surviving plant balances by primary plant account at 12/31/08 were also aged. The age of the surviving balances plus the remaining life were summed to determine the total life of the investments.

Salvage and Cost of Removal

Kentucky Power Company engaged the firm of Brandenburg Industrial Service Company to perform a conceptual demolition cost estimate for the Big Sandy Plant. The demolition cost is estimated to be \$32,000,000 in current (2008) dollars. It is appropriate to include the final retirement costs for the Big Sandy plant in depreciation rates in order to ensure that the generation of customers that are receiving service from the plant also share in the final removal costs of the plant.

There are also gross salvage and removal costs associated with the removal/replacement of equipment during the operating life of the plant. An analysis of interim retirements was made for the production plant function and the fifteen year period of 1994-2008 was used as the basis to determine a gross salvage percentage and a gross removal percentage. The estimates of salvage and removal for both the final plant retirement and the interim retirements were combined to calculate a net salvage for each plant account. That calculation is as follows:

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KENTUCKY POWER COMPANY
 Depreciation Study as of December 31, 2008
 Production Plant

Calculation of Removal and Salvage:

Interim Retirements:

Account	Interim Retirements (From Remaining Life Workpaper)	Gross Removal Percent	Gross Salvage Percent	Interim Retirement Net Salvage Percent
311	1,250,309	34%	6%	-28%
312	76,510,548	34%	6%	-28%
314	24,276,603	34%	6%	-28%
315	1,086,040	34%	6%	-28%
316	1,354,889	34%	6%	-28%
Total	104,478,389			

Account	Plant In-Service at 12/31/08	Net Salvage on Interim Retirement	Final Demolition Cost (a)	Total Net Salvage Costs	Net Salvage as Percent of Plant
311	40,583,921	-350,087	-3,342,154	-3,692,240	-9%
312	355,237,890	-21,422,953	-29,254,434	-50,677,387	-14%
314	104,506,857	-6,797,449	-8,606,314	-15,403,763	-15%
315	15,303,286	-304,091	-1,260,251	-1,564,342	-10%
316	6,518,954	-379,369	-536,847	-916,216	-14%
Total	522,150,908	-29,253,949	-43,000,000	-72,253,949	-14%

Notes: (a) Costs allocated to plant accounts based on Plant-In-Service Balances at 12/31/08

Calculation of Theoretical Reserve and Depreciation Rates

A theoretical reserve was determined based on the above calculations of average age, remaining life and net salvage. The theoretical reserve was used to allocate the actual book reserve to the individual plant accounts.

Based on plant balances at 12/31/08 and the allocated book reserve, remaining life depreciation rates were calculated for each primary plant account.

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KENTUCKY POWER COMPANY
DEPRECIATION STUDY AS OF 12-31-08
STEAM PRODUCTION PLANT WORKPAPERS

INTERIM RETIRMENT RATIOS

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KENTUCKY POWER COMPANY
 CALCULATION OF INTERIM RETIREMENT RATIOS
 STEAM PRODUCTION PLANT
 ACCOUNT 311.0 STRUCTURES & IMPROVEMENTS

<u>YEAR</u>	<u>ADDITIONS</u>	<u>RETIREMENTS</u>	<u>BALANCE</u>	<u>AVERAGE BALANCE</u>	<u>RETIREMENT RATIO</u>
1963	6,127,706	0	6,127,706	N. A.	N. A.
1964	13,194	0	6,140,900	6,134,303	0.0000
1965	18,607	255	6,159,252	6,150,076	0.0000
1966	4,255	7,338	6,156,169	6,157,711	0.0012
1967	575	69,333	6,087,411	6,121,790	0.0113
1968	21,282	0	6,108,693	6,098,052	0.0000
1969	15,770,374	0	21,879,067	13,993,880	0.0000
1970	803,526	7,182	22,675,411	22,277,239	0.0003
1971	163,043	37,002	22,801,452	22,738,432	0.0016
1972	56,860	0	22,858,312	22,829,882	0.0000
1973	2,605	0	22,860,917	22,859,615	0.0000
1974	66,090	1,665	22,925,342	22,893,130	0.0001
1975	29,219	0	22,954,561	22,939,952	0.0000
1976	65,662	0	23,020,223	22,987,392	0.0000
1977	87,499	0	23,107,722	23,063,973	0.0000
1978	297,729	24,379	23,381,072	23,244,397	0.0010
1979	214,311	5,000	23,590,383	23,485,728	0.0002
1980	27,547	6,618	23,611,312	23,600,848	0.0003
1981	212,801	358	23,823,755	23,717,534	0.0000
1982	716,535	44,396	24,495,894	24,159,825	0.0018
1983	389,851	307,808	24,577,937	24,536,916	0.0125
1984	81,115	469	24,658,583	24,618,260	0.0000
1985	64,741	1,605	24,721,719	24,690,151	0.0001
1986	0	0	24,721,719	24,721,719	0.0000
1987	34,955	966	24,755,708	24,738,714	0.0000
1988	171,684	718	24,926,674	24,841,191	0.0000
1989	28,362	2,856	24,952,180	24,939,427	0.0001
1990	484,041	3,690	25,432,531	25,192,356	0.0001
1991	18,357	35,387	25,415,501	25,424,016	0.0014
1992	22,217	13,640	25,424,078	25,419,790	0.0005
1993	168,711	56,800	25,535,989	25,480,034	0.0022
1994	1,254,912	4,050	26,786,851	26,161,420	0.0002
1995	45,725	9,070	26,823,506	26,805,179	0.0003
1996	113,294	94,931	26,841,869	26,832,688	0.0035
1997	0	101,804	26,740,065	26,790,967	0.0038
1998	2,448,051	54,548	29,133,568	27,936,817	0.0020
1999	220,173	4,000	29,349,741	29,241,655	0.0001
2000	46,629	17,282	29,379,088	29,364,415	0.0006
2001	20,444	8,355	29,391,177	29,385,133	0.0003
2002	431	1,168	29,390,440	29,390,809	0.0000
2003	6,265,695	5,061	35,651,074	32,520,757	0.0002
2004	630,676	74,097	36,207,653	35,929,364	0.0021
2005	2,005,164	60,910	38,151,907	37,179,780	0.0016
2006	484,134	118,897	38,517,144	38,334,526	0.0031
2007	1,141,080	258,942	39,399,282	38,958,213	0.0066
2008	1,533,583	348,944	40,583,921	39,991,602	0.0087
TOTAL 1975-2008	14,161,367	879,056	788,802,573	782,161,418	0.0537

Used 1975 through 2008 interim retirements. Based on retirements five years after in-service date of Unit 2.

AVERAGE INTERIM RATE $\frac{0.0537}{34}$ 0.0016

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KENTUCKY POWER COMPANY
 CALCULATION OF INTERIM RETIREMENT RATIOS
 STEAM PRODUCTION PLANT
 ACCOUNT 312.0 BOILER PLANT EQUIPMENT

<u>YEAR</u>	<u>ADDITIONS</u>	<u>RETIREMENTS</u>	<u>BALANCE</u>	<u>AVERAGE BALANCE</u>	<u>RETIREMENT RATIO</u>
1963	27,271,786	0	27,271,786	N. A.	N. A.
1964	119,842	8,093	27,383,535	27,327,661	0.0003
1965	33,135	7,505	27,409,165	27,396,350	0.0003
1966	176,256	19,803	27,565,618	27,487,392	0.0007
1967	7,026	3,196	27,569,448	27,567,533	0.0001
1968	39,011	127,966	27,480,493	27,524,971	0.0046
1969	57,241,411	5,000	84,716,904	56,098,699	0.0001
1970	2,611,299	569,493	86,758,710	85,737,807	0.0066
1971	1,703,522	87,366	88,374,866	87,566,788	0.0010
1972	773,998	23,261	89,125,603	88,750,235	0.0003
1973	124,697	24,700	89,225,600	89,175,602	0.0003
1974	795,833	128,171	89,893,262	89,559,431	0.0014
1975	1,177,739	43,910	91,027,091	90,460,177	0.0005
1976	4,699,081	1,136,240	94,589,932	92,808,512	0.0122
1977	1,500,565	738,415	95,352,082	94,971,007	0.0078
1978	3,596,304	210,933	98,737,453	97,044,768	0.0022
1979	3,702,290	690,851	101,748,892	100,243,173	0.0069
1980	1,574,173	1,302,708	102,020,357	101,884,625	0.0128
1981	2,710,157	1,947,465	102,783,049	102,401,703	0.0190
1982	4,780,741	1,372,184	106,191,606	104,487,328	0.0131
1983	2,053,897	244,647	108,000,856	107,096,231	0.0023
1984	1,928,226	583,176	109,345,906	108,673,381	0.0054
1985	1,775,366	79,270	111,042,002	110,193,954	0.0007
1986	1,302,549	1,199,650	111,144,901	111,093,452	0.0108
1987	2,870,827	941,836	113,073,892	112,109,397	0.0084
1988	2,769,412	757,438	115,085,866	114,079,879	0.0066
1989	1,780,224	543,698	116,322,392	115,704,129	0.0047
1990	2,114,057	841,371	117,595,078	116,958,735	0.0072
1991	1,503,783	964,562	118,134,299	117,864,689	0.0082
1992	3,022,972	929,688	120,227,583	119,180,941	0.0078
1993	6,037,402	2,619,487	123,645,498	121,936,541	0.0215
1994	11,992,454	1,471,709	134,166,243	128,905,871	0.0114
1995	10,399,357	5,694,627	138,870,973	136,518,608	0.0417
1996	12,608,246	12,608,246	138,870,973	138,870,973	0.0908
1997	0	3,024,973	135,846,000	137,358,487	0.0220
1998	10,554,688	901,600	145,499,088	140,672,544	0.0064
1999	1,940,785	263,258	147,176,615	146,337,852	0.0018
2000	2,930,632	704,876	149,402,371	148,289,493	0.0048
2001	925,934	356,729	149,971,576	149,686,974	0.0024
2002	3,329,584	560,581	152,740,579	151,356,078	0.0037
2003	183,221,112	15,170,924	320,790,767	236,765,673	0.0641
2004	6,041,203	2,293,276	324,538,694	322,664,731	0.0071
2005	6,490,044	946,348	330,082,390	327,310,542	0.0029
2006	7,880,638	2,730,271	335,232,757	332,657,574	0.0082
2007	4,975,558	2,668,838	337,539,477	336,386,117	0.0079
2008	23,004,352	5,305,939	355,237,890	346,388,684	0.0153
TOTAL 1975-2008	294,843,760	60,198,328	3,993,942,614	3,876,619,898	0.4486

Used 1975 through 2008 interim retirements. Based on retirements five years after in-service date of Unit 2.

AVERAGE INTERIM RATE $\frac{0.4486}{0.0132}$

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KENTUCKY POWER COMPANY
 CALCULATION OF INTERIM RETIREMENT RATIOS
 STEAM PRODUCTION PLANT
 ACCOUNT 314.0 TURBO-GENERATOR UNITS

<u>YEAR</u>	<u>ADDITIONS</u>	<u>RETIREMENTS</u>	<u>BALANCE</u>	<u>AVERAGE BALANCE</u>	<u>RETIREMENT RATIO</u>
1963	11,920,700	0	11,920,700	N. A.	N. A.
1964	19,361	0	11,940,061	11,930,381	0.0000
1965	12,601	755	11,951,907	11,945,984	0.0001
1966	7,592	872	11,958,627	11,955,267	0.0001
1967	7,158	0	11,965,785	11,962,206	0.0000
1968	52,378	0	12,018,163	11,991,974	0.0000
1969	26,377,737	0	38,395,900	25,207,032	0.0000
1970	1,024,372	180,383	39,239,889	38,817,895	0.0046
1971	713,082	0	39,952,971	39,596,430	0.0000
1972	272,380	0	40,225,351	40,089,161	0.0000
1973	63,768	0	40,289,119	40,257,235	0.0000
1974	63,140	0	40,352,259	40,320,689	0.0000
1975	336,271	80,578	40,607,952	40,480,106	0.0020
1976	74,777	2,746	40,679,983	40,643,968	0.0001
1977	33,676	1,548	40,712,111	40,696,047	0.0000
1978	45,149	6,818	40,750,442	40,731,277	0.0002
1979	1,007,454	398,443	41,359,453	41,054,948	0.0097
1980	66,913	214,355	41,212,011	41,285,732	0.0052
1981	1,916,304	618,632	42,509,683	41,860,847	0.0148
1982	1,006,642	82,616	43,433,709	42,971,696	0.0019
1983	1,067,481	549,626	43,951,564	43,692,637	0.0126
1984	237,266	2,944	44,185,886	44,068,725	0.0001
1985	528,415	7,819	44,706,482	44,446,184	0.0002
1986	634,657	709,776	44,631,363	44,668,923	0.0159
1987	229,683	307,098	44,553,948	44,592,656	0.0069
1988	5,606,623	58,088	50,102,483	47,328,216	0.0012
1989	3,103,073	2,768,504	50,437,052	50,269,768	0.0551
1990	2,320,315	1,094,464	51,662,903	51,049,978	0.0214
1991	2,065,521	138,353	53,590,071	52,626,487	0.0026
1992	836,989	1,593,641	52,833,419	53,211,745	0.0299
1993	2,739,309	550,206	55,022,522	53,927,971	0.0102
1994	2,265,960	2,354,678	54,933,804	54,978,163	0.0428
1995	1,186,873	444,477	55,676,200	55,305,002	0.0080
1996	126,815	477,746	55,325,269	55,500,735	0.0086
1997	13,047,841	4,684,964	63,688,146	59,506,708	0.0787
1998	0	695,946	62,992,200	63,340,173	0.0110
1999	0	205,238	62,786,962	62,889,581	0.0033
2000	227,801	52,538	62,962,225	62,874,594	0.0008
2001	47,682	141,367	62,868,540	62,915,383	0.0022
2002	1,505,312	257,582	64,116,270	63,492,405	0.0041
2003	9,648,825	1,427,668	72,337,427	68,226,849	0.0209
2004	1,394,539	692,983	73,038,983	72,688,205	0.0095
2005	1,257,589	333,750	73,962,822	73,500,903	0.0045
2006	1,053,124	493,138	74,522,808	74,242,815	0.0066
2007	1,393,818	884,733	75,031,893	74,777,351	0.0118
2008	29,686,507	211,543	104,506,857	89,769,375	0.0024
TOTAL 1975-2008	53,308,166	20,621,442	1,557,669,063	1,541,325,701	0.4054

Used 1975 through 2008 interim retirements. Based on retirements five years after in-service date of Unit 2.

AVERAGE INTERIM RATE $\frac{0.4054}{0.0119}$

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KENTUCKY POWER COMPANY
 CALCULATION OF INTERIM RETIREMENT RATIOS
 STEAM PRODUCTION PLANT
 ACCOUNT 315.0 ACCESSORY ELECTRICAL EQUIPMENT

<u>YEAR</u>	<u>ADDITIONS</u>	<u>RETIREMENTS</u>	<u>BALANCE</u>	<u>AVERAGE BALANCE</u>	<u>RETIREMENT RATIO</u>
1963	2,298,368	0	2,298,368	N. A.	N. A.
1964	9,817	2,835	2,305,350	2,301,859	0.0012
1965	2,265	0	2,307,615	2,306,483	0.0000
1966	20,284	0	2,327,899	2,317,757	0.0000
1967	4,595	0	2,332,494	2,330,197	0.0000
1968	947	0	2,333,441	2,332,968	0.0000
1969	6,451,294	0	8,784,735	5,559,088	0.0000
1970	555,696	0	9,340,431	9,062,583	0.0000
1971	356,319	0	9,696,750	9,518,591	0.0000
1972	13,318	2,910	9,707,158	9,701,954	0.0003
1973	114,131	12,654	9,808,635	9,757,897	0.0013
1974	1,489	4,680	9,805,444	9,807,040	0.0005
1975	0	0	9,805,444	9,805,444	0.0000
1976	425,620	0	10,231,064	10,018,254	0.0000
1977	113,934	0	10,344,998	10,288,031	0.0000
1978	226,909	0	10,571,907	10,458,453	0.0000
1979	40,978	0	10,612,885	10,592,396	0.0000
1980	81,148	0	10,694,033	10,653,459	0.0000
1981	607,835	49,582	11,252,286	10,973,160	0.0045
1982	369,121	120,858	11,500,549	11,376,418	0.0106
1983	92,707	10,516	11,582,740	11,541,645	0.0009
1984	88,302	5,454	11,665,588	11,624,164	0.0005
1985	108,963	11,203	11,763,348	11,714,468	0.0010
1986	38,938	19,802	11,782,484	11,772,916	0.0017
1987	119,792	27,283	11,874,993	11,828,739	0.0023
1988	187,376	71,442	11,990,927	11,932,960	0.0060
1989	100,224	0	12,091,151	12,041,039	0.0000
1990	286,615	24,236	12,353,530	12,222,341	0.0020
1991	106,173	12,852	12,446,851	12,400,191	0.0010
1992	38,842	10,027	12,475,666	12,461,259	0.0008
1993	115,632	9,068	12,582,230	12,528,948	0.0007
1994	79,021	1,052	12,660,199	12,621,215	0.0001
1995	35,386	91,239	12,604,346	12,632,273	0.0072
1996	12,996	0	12,617,342	12,610,844	0.0000
1997	1,139,691	324,810	13,432,223	13,024,783	0.0249
1998	363,986	24,960	13,771,249	13,601,736	0.0018
1999	8,929	1,372	13,778,806	13,775,028	0.0001
2000	368,049	80,920	14,065,935	13,922,371	0.0058
2001	46,339	32,876	14,079,398	14,072,667	0.0023
2002	7,426	2,009	14,084,815	14,082,107	0.0001
2003	244,780	587,860	13,741,735	13,913,275	0.0423
2004	4,907	4,041	13,742,601	13,742,168	0.0003
2005	1,210,759	12,798	14,940,562	14,341,582	0.0009
2006	206,091	57,499	15,089,154	15,014,858	0.0038
2007	173,582	46,468	15,216,268	15,152,711	0.0031
2008	103,305	16,287	15,303,286	15,259,777	0.0011
TOTAL 1975-2008	5,460,619	1,523,462	366,201,323	364,232,745	0.1259

Used 1975 through 2008 interim retirements. Based on retirements five years after in-service date of Unit 2.

AVERAGE INTERIM RATE $\frac{0.1259}{0.0037}$
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KENTUCKY POWER COMPANY
 CALCULATION OF INTERIM RETIREMENT RATIOS
 STEAM PRODUCTION PLANT
 ACCOUNT 316.0 MISCELLANEOUS POWER PLANT EQUIPMENT

<u>YEAR</u>	<u>ADDITIONS</u>	<u>RETIREMENTS</u>	<u>BALANCE</u>	<u>AVERAGE BALANCE</u>	<u>RETIREMENT RATIO</u>
1963	726,100	0	726,100	N. A.	N. A.
1964	5,839	1,922	730,017	728,059	0.0026
1965	5,676	0	735,693	732,855	0.0000
1966	15,702	292	751,103	743,398	0.0004
1967	2,344	394	753,053	752,078	0.0005
1968	8,129	150	761,032	757,043	0.0002
1969	1,686,335	1,226	2,446,141	1,603,587	0.0008
1970	204,242	8,507	2,641,876	2,544,009	0.0033
1971	88,954	1,728	2,729,102	2,685,489	0.0006
1972	58,425	83	2,787,444	2,758,273	0.0000
1973	93,582	1,700	2,879,326	2,833,385	0.0006
1974	555	37,702	2,842,179	2,860,753	0.0132
1975	132,129	1,473	2,972,835	2,907,507	0.0005
1976	20,739	6,251	2,987,323	2,980,079	0.0021
1977	66,965	13,849	3,040,439	3,013,881	0.0046
1978	37,660	27,895	3,050,204	3,045,322	0.0092
1979	25,265	5,173	3,070,296	3,060,250	0.0017
1980	17,868	15,971	3,072,193	3,071,245	0.0052
1981	117,316	3,482	3,186,027	3,129,110	0.0011
1982	122,076	54,567	3,253,536	3,219,782	0.0169
1983	6,160	14,806	3,244,890	3,249,213	0.0046
1984	78,342	5,857	3,317,375	3,281,133	0.0018
1985	101,194	2,086	3,416,483	3,366,929	0.0006
1986	108,695	11,296	3,513,882	3,465,183	0.0033
1987	32,012	12,552	3,533,342	3,523,612	0.0036
1988	29,324	12,736	3,549,930	3,541,636	0.0036
1989	169,870	5,926	3,713,874	3,631,902	0.0016
1990	34,137	10,400	3,737,611	3,725,743	0.0028
1991	41,416	3,814	3,775,213	3,756,412	0.0010
1992	127,431	70,529	3,832,115	3,803,664	0.0185
1993	21,290	623	3,852,782	3,842,449	0.0002
1994	803,660	136,159	4,520,283	4,186,533	0.0325
1995	91,614	104,801	4,507,096	4,513,690	0.0232
1996	39,964	9,510	4,537,550	4,522,323	0.0021
1997	865,744	31,903	5,371,391	4,954,471	0.0064
1998	6,545	51,000	5,326,936	5,349,164	0.0095
1999	31,382	805	5,357,513	5,342,225	0.0002
2000	64,253	0	5,421,766	5,389,640	0.0000
2001	59,062	4,330	5,476,498	5,449,132	0.0008
2002	67,283	38,540	5,505,241	5,490,870	0.0070
2003	442,131	62,105	5,885,267	5,695,254	0.0109
2004	698,136	64,449	6,518,954	6,202,111	0.0104
2005	191,000	31,593	6,678,361	6,598,658	0.0048
2006	176,384	20,681	6,834,064	6,756,213	0.0031
2007	302,266	15,563	7,120,767	6,977,416	0.0022
2008	78,252	25,877	7,173,142	7,146,955	0.0036
TOTAL 1975-2008	4,459,663	782,888	122,548,845	120,710,458	0.1996

Used 1975 through 2008 interim retirements. Based on retirements five years after in-service date of Unit 2.

AVERAGE INTERIM RATE 0.1996

0.0059
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KENTUCKY POWER COMPANY
DEPRECIATION STUDY AS OF 12-31-08
STEAM PRODUCTION PLANT WORKPAPERS

AVERAGE AGE CALCULATIONS

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KENTUCKY POWER COMPANY
 DEPRECIATION STUDY AS OF DECEMBER 31, 2008
 CALCULATION OF AVERAGE AGE OF SURVIVING PLANT
 BIG SANDY GENERATING PLANT

311

<u>VINTAGE</u> <u>YEAR</u>	<u>SURVIVING</u> <u>BALANCE</u>	<u>AGE</u> <u>(YEARS)</u>	<u>DOLLAR</u> <u>YEARS</u>	<u>AVERAGE AGE</u> <u>(YEARS)</u>
1963	5,733,371	45.5	260,868,402	
1964	13,194	44.5	587,133	
1965	18,352	43.5	798,312	
1966	3,636	42.5	154,530	
1967	217	41.5	9,006	
1968	21,282	40.5	861,921	
1969	15,030,655	39.5	593,710,888	
1970	798,917	38.5	30,758,305	
1971	162,704	37.5	6,101,400	
1972	56,780	36.5	2,072,470	
1973	2,605	35.5	92,478	
1974	5,005	34.5	172,673	
1975	28,389	33.5	951,032	
1976	65,662	32.5	2,134,015	
1977	76,759	31.5	2,417,909	
1978	290,514	30.5	8,860,677	
1979	163,014	29.5	4,808,925	
1980	23,035	28.5	656,501	
1981	212,801	27.5	5,852,028	
1982	659,475	26.5	17,476,075	
1983	334,415	25.5	8,527,595	
1984	2,624	24.5	64,287	
1985	-2,666	23.5	-62,648	
1986	0	22.5	0	
1987	34,955	21.5	751,533	
1988	171,684	20.5	3,519,522	
1989	15,604	19.5	304,278	
1990	452,845	18.5	8,377,626	
1991	11,250	17.5	196,875	
1992	20,716	16.5	341,814	
1993	157,920	15.5	2,447,760	
1994	1,185,417	14.5	17,188,551	
1995	21,942	13.5	296,214	
1996	465,478	12.5	5,818,479	
1997	719,120	11.5	8,269,880	
1998	1,341,044	10.5	14,080,965	
1999	56,378	9.5	535,594	
2000	202,044	8.5	1,717,378	
2001	431	7.5	3,229	
2002	6,208,831	6.5	40,357,401	
2003	315,933	5.5	1,737,633	
2004	555,899	4.5	2,501,544	
2005	1,838,533	3.5	6,434,866	
2006	864,204	2.5	2,160,510	
2007	941,391	1.5	1,412,086	
2008	<u>1,301,560</u>	0.5	<u>650,780</u>	
TOTALS	<u>40,583,920</u>		<u>1,066,978,425</u>	<u>26.29</u>

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KENTUCKY POWER COMPANY
 DEPRECIATION STUDY AS OF DECEMBER 31, 2008
 CALCULATION OF AVERAGE AGE OF SURVIVING PLANT
 BIG SANDY GENERATING PLANT 312

VINTAGE YEAR	SURVIVING BALANCE	AGE (YEARS)	DOLLAR YEARS	AVERAGE AGE (YEARS)
1963	5,221,363	45.5	237,572,034	
1964	104,317	44.5	4,642,107	
1965	28,441	43.5	1,237,184	
1966	31,857	42.5	1,353,923	
1967	1,203	41.5	49,925	
1968	35,690	40.5	1,445,452	
1969	35,005,251	39.5	1,382,707,404	
1970	2,331,209	38.5	89,751,554	
1971	1,583,333	37.5	59,374,988	
1972	650,002	36.5	23,725,065	
1973	54,734	35.5	1,943,057	
1974	634,949	34.5	21,905,735	
1975	927,822	33.5	31,082,037	
1976	656,789	32.5	21,345,633	
1977	569,745	31.5	17,946,956	
1978	3,517,702	30.5	107,289,911	
1979	2,834,222	29.5	83,609,546	
1980	1,520,576	28.5	43,336,409	
1981	2,042,101	27.5	56,157,778	
1982	3,684,145	26.5	97,629,838	
1983	1,682,108	25.5	42,893,758	
1984	1,270,809	24.5	31,134,815	
1985	1,591,926	23.5	37,410,250	
1986	1,277,585	22.5	28,745,664	
1987	2,803,811	21.5	60,281,934	
1988	2,626,915	20.5	53,851,762	
1989	1,288,604	19.5	25,127,785	
1990	1,606,399	18.5	29,718,378	
1991	1,132,899	17.5	19,825,725	
1992	2,519,831	16.5	41,577,219	
1993	2,527,668	15.5	39,178,861	
1994	11,283,386	14.5	163,609,095	
1995	10,084,567	13.5	136,141,654	
1996	7,699,950	12.5	96,249,369	
1997	6,801,256	11.5	78,214,444	
1998	6,103,229	10.5	64,083,902	
1999	180,737	9.5	1,717,006	
2000	814,117	8.5	6,919,997	
2001	359,889	7.5	2,699,167	
2002	33,455,436	6.5	217,460,335	
2003	152,049,189	5.5	836,270,539	
2004	5,715,692	4.5	25,720,613	
2005	4,740,964	3.5	16,593,373	
2006	7,054,669	2.5	17,636,672	
2007	4,413,992	1.5	6,620,989	
2008	<u>22,716,813</u>	0.5	<u>11,358,406</u>	
TOTALS	<u>355,237,890</u>		<u>4,375,148,243</u>	<u>12.32</u>

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KENTUCKY POWER COMPANY
 DEPRECIATION STUDY AS OF DECEMBER 31, 2008
 CALCULATION OF AVERAGE AGE OF SURVIVING PLANT
 BIG SANDY GENERATING PLANT 314

VINTAGE YEAR	SURVIVING BALANCE	AGE (YEARS)	DOLLAR YEARS	AVERAGE AGE (YEARS)
1963	5,378,356	45.5	244,715,205	
1964	0	44.5	0	
1965	14	43.5	619	
1966	59,271	42.5	2,518,999	
1967	-2,274	41.5	-94,366	
1968	-30	40.5	-1,199	
1969	20,503,966	39.5	809,906,637	
1970	905,886	38.5	34,876,600	
1971	702,552	37.5	26,345,700	
1972	263,990	36.5	9,635,635	
1973	59,137	35.5	2,099,364	
1974	14,534	34.5	501,419	
1975	240,134	33.5	8,044,489	
1976	9,309	32.5	302,543	
1977	19,103	31.5	601,745	
1978	11,239	30.5	342,787	
1979	529,416	29.5	15,617,786	
1980	-9,347	28.5	-266,396	
1981	1,893,106	27.5	52,060,415	
1982	412,999	26.5	10,944,474	
1983	1,014,327	25.5	25,865,339	
1984	96,771	24.5	2,370,878	
1985	353	23.5	8,304	
1986	182,239	22.5	4,100,366	
1987	226,283	21.5	4,865,090	
1988	3,248,362	20.5	66,591,426	
1989	1,951,999	19.5	38,063,981	
1990	949,491	18.5	17,565,589	
1991	1,613,279	17.5	28,232,379	
1992	0	16.5	0	
1993	2,630,759	15.5	40,776,761	
1994	2,166,603	14.5	31,415,744	
1995	1,138,602	13.5	15,371,132	
1996	1,599,423	12.5	19,992,791	
1997	127	11.5	1,461	
1998	11,093,444	10.5	116,481,159	
1999	7,235	9.5	68,737	
2000	79,722	8.5	677,637	
2001	17,232	7.5	129,237	
2002	9,082,076	6.5	59,033,493	
2003	1,861,942	5.5	10,240,681	
2004	1,510,645	4.5	6,797,904	
2005	614,020	3.5	2,149,069	
2006	1,779,841	2.5	4,449,602	
2007	993,516	1.5	1,490,273	
2008	<u>29,657,206</u>	0.5	<u>14,828,603</u>	
TOTALS	<u>104,506,857</u>		<u>1,729,720,089</u>	<u>16.55</u>

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KENTUCKY POWER COMPANY
 DEPRECIATION STUDY AS OF DECEMBER 31, 2008
 CALCULATION OF AVERAGE AGE OF SURVIVING PLANT
 BIG SANDY GENERATING PLANT 315

VINTAGE YEAR	SURVIVING BALANCE	AGE (YEARS)	DOLLAR YEARS	AVERAGE AGE (YEARS)
1963	1,461,926	45.5	66,517,635	
1964	0	44.5	0	
1965	1,390	43.5	60,467	
1966	0	42.5	0	
1967	0	41.5	0	
1968	0	40.5	0	
1969	6,089,160	39.5	240,521,819	
1970	555,061	38.5	21,369,840	
1971	355,383	37.5	13,326,863	
1972	13,318	36.5	486,107	
1973	114,131	35.5	4,051,651	
1974	1,489	34.5	51,371	
1975	0	33.5	0	
1976	289,966	32.5	9,423,895	
1977	113,934	31.5	3,588,921	
1978	216,942	30.5	6,616,731	
1979	40,978	29.5	1,208,851	
1980	79,680	28.5	2,270,877	
1981	429,265	27.5	11,804,776	
1982	353,773	26.5	9,374,985	
1983	89,002	25.5	2,269,551	
1984	88,303	24.5	2,163,424	
1985	87,208	23.5	2,049,380	
1986	486	22.5	10,935	
1987	119,792	21.5	2,575,528	
1988	187,376	20.5	3,841,208	
1989	100,224	19.5	1,954,368	
1990	259,710	18.5	4,804,635	
1991	106,173	17.5	1,858,028	
1992	38,842	16.5	640,893	
1993	115,632	15.5	1,792,296	
1994	29,209	14.5	423,535	
1995	18,207	13.5	245,799	
1996	360,098	12.5	4,501,225	
1997	945,619	11.5	10,874,619	
1998	405,268	10.5	4,255,314	
1999	2,861	9.5	27,180	
2000	228,090	8.5	1,938,763	
2001	77,560	7.5	581,698	
2002	548,314	6.5	3,564,041	
2003	893,356	5.5	4,913,459	
2004	19,722	4.5	88,750	
2005	6,829	3.5	23,902	
2006	182,121	2.5	455,302	
2007	173,582	1.5	260,374	
2008	<u>103,306</u>	0.5	<u>51,653</u>	
TOTALS	<u>15,303,286</u>		<u>446,840,645</u>	<u>29.20</u>

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KENTUCKY POWER COMPANY
 DEPRECIATION STUDY AS OF DECEMBER 31, 2008
 CALCULATION OF AVERAGE AGE OF SURVIVING PLANT
 BIG SANDY GENERATING PLANT 316

VINTAGE YEAR	SURVIVING BALANCE	AGE (YEARS)	DOLLAR YEARS	AVERAGE AGE (YEARS)
1963	787,153	45.5	35,815,443	
1964	4,644	44.5	206,658	
1965	5,340	43.5	232,290	
1966	8,383	42.5	356,278	
1967	2,344	41.5	97,276	
1968	3,755	40.5	152,078	
1969	1,535,776	39.5	60,663,158	
1970	197,493	38.5	7,603,481	
1971	84,826	37.5	3,180,975	
1972	48,144	36.5	1,757,256	
1973	23,088	35.5	819,624	
1974	94	34.5	3,243	
1975	124,869	33.5	4,183,112	
1976	18,611	32.5	604,858	
1977	8,980	31.5	282,868	
1978	34,424	30.5	1,049,932	
1979	25,081	29.5	739,890	
1980	11,193	28.5	318,991	
1981	97,226	27.5	2,673,715	
1982	72,372	26.5	1,917,863	
1983	0	25.5	0	
1984	65,241	24.5	1,598,405	
1985	87,922	23.5	2,066,167	
1986	96,287	22.5	2,166,458	
1987	32,012	21.5	688,258	
1988	29,324	20.5	601,142	
1989	82,538	19.5	1,609,491	
1990	17,035	18.5	315,142	
1991	29,306	17.5	512,855	
1992	93,344	16.5	1,540,169	
1993	11,344	15.5	175,839	
1994	1,249,784	14.5	18,121,868	
1995	125,591	13.5	1,695,479	
1996	184,929	12.5	2,311,613	
1997	217,359	11.5	2,499,627	
1998	58,674	10.5	616,077	
1999	42,911	9.5	407,653	
2000	7,491	8.5	63,670	
2001	50,660	7.5	379,952	
2002	73,297	6.5	476,432	
2003	611,808	5.5	3,364,943	
2004	195,654	4.5	880,445	
2005	197,186	3.5	690,150	
2006	214,203	2.5	535,508	
2007	264,613	1.5	396,919	
2008	<u>40,836</u>	0.5	<u>20,418</u>	
TOTALS	<u>7,173,143</u>		<u>166,393,664</u>	<u>23.20</u>

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KENTUCKY POWER COMPANY

DEPRECIATION STUDY AS OF 12-31-08

STEAM PRODUCTION PLANT WORKPAPERS

AVERAGE REMAINING LIFE CALCULATIONS

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KENTUCKY POWER COMPANY
 DEPRECIATION STUDY AS OF DECEMBER 31, 2008
 CALCULATION OF AVERAGE REMAINING LIFE
 BIG SANDY PLANT ACCOUNT 311
 RETIREMENT YEARS - UNIT 1 2023; UNIT 2 2029

ANNUAL INTERIM RETIREMENT RATE 0.0016

<u>YEAR</u>	<u>AMOUNT RETIRED</u>	<u>REM. LIFE (YEARS)</u>	<u>DOLLAR YEARS</u>	<u>AVERAGE REM. LIFE</u>
2009	64,934	0.5	32,467	
2010	64,934	1.5	97,401	
2011	64,934	2.5	162,336	
2012	64,934	3.5	227,270	
2013	64,934	4.5	292,204	
2014	64,934	5.5	357,139	
2015	64,934	6.5	422,073	
2016	64,934	7.5	487,007	
2017	64,934	8.5	551,941	
2018	64,934	9.5	616,876	
2019	64,934	10.5	681,810	
2020	64,934	11.5	746,744	
2021	64,934	12.5	811,678	
2022	64,934	13.5	876,613	
2023	6,111,995	14.5	88,623,931	
2024	55,259	15.5	856,514	
2025	55,259	16.5	911,773	
2026	55,259	17.5	967,032	
2027	55,259	18.5	1,022,291	
2028	55,259	19.5	1,077,550	
2029	33,286,551	20.5	682,374,296	
TOTALS	40,583,921		782,196,947	19.27

INTERIM RETIREMENTS:

Total Plant at 12/31/08	40,583,921
Less Retirement of Unit 1 in 2023	-6,047,061
Less Final Retirement in year 2029	<u>-33,286,551</u>
Total Interim Retirements	<u>1,250,309</u>

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KENTUCKY POWER COMPANY
 DEPRECIATION STUDY AS OF DECEMBER 31, 2008
 CALCULATION OF AVERAGE REMAINING LIFE
 BIG SANDY PLANT ACCOUNT 312
 RETIREMENT YEARS - UNIT 1 2023; UNIT 2 2029

ANNUAL INTERIM RETIREMENT RATE 0.0132

<u>YEAR</u>	<u>AMOUNT RETIRED</u>	<u>REM. LIFE (YEARS)</u>	<u>DOLLAR YEARS</u>	<u>AVERAGE REM. LIFE</u>
2009	4,689,140	0.5	2,344,570	
2010	4,689,140	1.5	7,033,710	
2011	6,318,664	2.5	15,796,660	
2012	4,667,630	3.5	16,336,707	
2013	4,667,630	4.5	21,004,337	
2014	4,667,630	5.5	25,671,967	
2015	7,926,679	6.5	51,523,416	
2016	7,883,660	7.5	59,127,450	
2017	4,581,592	8.5	38,943,528	
2018	4,581,592	9.5	43,525,120	
2019	4,581,592	10.5	48,106,711	
2020	4,581,592	11.5	52,688,303	
2021	4,581,592	12.5	57,269,894	
2022	4,581,592	13.5	61,851,486	
2023	4,581,592	14.5	66,433,077	
2024	4,581,592	15.5	71,014,669	
2025	4,581,592	16.5	75,596,261	
2026	4,581,592	17.5	80,177,852	
2027	4,581,592	18.5	84,759,444	
2028	4,581,592	19.5	89,341,035	
2029	254,748,616	20.5	5,222,346,633	
TOTALS	355,237,890		6,190,892,831	17.43

INTERIM RETIREMENTS:

Total Plant at 12/31/08	355,237,890
Less Retirement of Unit 1 in 2023	-22,537,880
Less Final Retirement in year 2029	<u>-254,748,616</u>
Total Interim Retirements	<u>77,951,394</u>

Retirement of SCR Catalysts

Layer 1 2015	3,259,048
Layer 2 2016	3,259,049
Layer 3 2011	<u>1,629,524</u>
	<u>8,147,621</u>

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KENTUCKY POWER COMPANY
 DEPRECIATION STUDY AS OF DECEMBER 31, 2008
 CALCULATION OF AVERAGE REMAINING LIFE
 BIG SANDY PLANT ACCOUNT 314
 RETIREMENT YEARS - UNIT 1 2023; UNIT 2 2029

ANNUAL INTERIM RETIREMENT RATE 0.0119

<u>YEAR</u>	<u>AMOUNT RETIRED</u>	<u>REM. LIFE (YEARS)</u>	<u>DOLLAR YEARS</u>	<u>AVERAGE REM. LIFE</u>
2009	1,243,632	0.5	621,816	
2010	1,243,632	1.5	1,865,447	
2011	1,243,632	2.5	3,109,079	
2012	1,243,632	3.5	4,352,711	
2013	1,243,632	4.5	5,596,342	
2014	1,243,632	5.5	6,839,974	
2015	1,243,632	6.5	8,083,605	
2016	1,243,632	7.5	9,327,237	
2017	1,243,632	8.5	10,570,869	
2018	1,243,632	9.5	11,814,500	
2019	1,243,632	10.5	13,058,132	
2020	1,243,632	11.5	14,301,763	
2021	1,243,632	12.5	15,545,395	
2022	1,243,632	13.5	16,789,027	
2023	11,260,925	14.5	163,283,407	
2024	1,124,426	15.5	17,428,600	
2025	1,124,426	16.5	18,553,026	
2026	1,124,426	17.5	19,677,452	
2027	1,124,426	18.5	20,801,878	
2028	1,124,426	19.5	21,926,303	
2029	70,212,961	20.5	1,439,365,700	
TOTALS	104,506,857		1,822,912,262	17.44

INTERIM RETIREMENTS:

Total Plant at 12/31/08	104,506,857
Less Retirement of Unit 1 in 2023	-10,017,293
Less Final Retirement in year 2029	<u>-70,212,961</u>
Total Interim Retirements	<u>24,276,603</u>

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KENTUCKY POWER COMPANY
 DEPRECIATION STUDY AS OF DECEMBER 31, 2008
 CALCULATION OF AVERAGE REMAINING LIFE
 BIG SANDY PLANT ACCOUNT 315
 RETIREMENT YEARS - UNIT 1 2023; UNIT 2 2029

ANNUAL INTERIM RETIREMENT RATE 0.0037

<u>YEAR</u>	<u>AMOUNT RETIRED</u>	<u>REM. LIFE (YEARS)</u>	<u>DOLLAR YEARS</u>	<u>AVERAGE REM. LIFE</u>
2009	56,622	0.5	28,311	
2010	56,622	1.5	84,933	
2011	56,622	2.5	141,555	
2012	56,622	3.5	198,178	
2013	56,622	4.5	254,800	
2014	56,622	5.5	311,422	
2015	56,622	6.5	368,044	
2016	56,622	7.5	424,666	
2017	56,622	8.5	481,288	
2018	56,622	9.5	537,911	
2019	56,622	10.5	594,533	
2020	56,622	11.5	651,155	
2021	56,622	12.5	707,777	
2022	56,622	13.5	764,399	
2023	2,266,458	14.5	32,863,639	
2024	48,426	15.5	750,598	
2025	48,426	16.5	799,024	
2026	48,426	17.5	847,450	
2027	48,426	18.5	895,876	
2028	48,426	19.5	944,301	
2029	12,001,989	20.5	246,040,782	
TOTALS	15,303,286		288,690,642	18.86

INTERIM RETIREMENTS:

Total Plant at 12/31/08	15,303,286
Less Retirement of Unit 1 in 2023	-2,215,257
Less Final Retirement in year 2029	<u>-12,001,989</u>
Total Interim Retirements	<u>1,086,040</u>

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KENTUCKY POWER COMPANY
 DEPRECIATION STUDY AS OF DECEMBER 31, 2008
 CALCULATION OF AVERAGE REMAINING LIFE
 BIG SANDY PLANT ACCOUNT 316
 RETIREMENT YEARS -- UNIT 1 2023; UNIT 2 2029

ANNUAL INTERIM RETIREMENT RATE 0.0059

<u>YEAR</u>	<u>AMOUNT RETIRED</u>	<u>REM. LIFE (YEARS)</u>	<u>DOLLAR YEARS</u>	<u>AVERAGE REM. LIFE</u>
2009	42,322	0.5	21,161	
2010	42,322	1.5	63,482	
2011	42,322	2.5	105,804	
2012	42,322	3.5	148,125	
2013	42,322	4.5	190,447	
2014	42,322	5.5	232,768	
2015	42,322	6.5	275,090	
2016	42,322	7.5	317,412	
2017	42,322	8.5	359,733	
2018	42,322	9.5	402,055	
2019	42,322	10.5	444,376	
2020	42,322	11.5	486,698	
2021	42,322	12.5	529,019	
2022	42,322	13.5	571,341	
2023	743,023	14.5	10,773,827	
2024	38,187	15.5	591,905	
2025	38,187	16.5	630,092	
2026	38,187	17.5	668,280	
2027	38,187	18.5	706,467	
2028	38,187	19.5	744,654	
2029	5,646,681	20.5	115,756,959	
TOTALS	7,173,142		134,019,694	18.68

INTERIM RETIREMENTS:

Total Plant at 12/31/08	7,173,142
Less Retirement of Unit 1 in 2023	-700,701
Less Final Retirement in year 2029	<u>-5,646,681</u>
Total Interim Retirements	<u>825,760</u>

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KENTUCKY POWER COMPANY
 Depreciation Study as of December 31, 2008
 Retirement of Big Sandy Unit 1

Account	311	312	314	315	316
12/31/08 Vintage 1963-1968	6,185,619	27,647,056	12,019,790	2,336,276	763,790
Interim Retirement Ratios	0.0016	0.0132	0.0119	0.0037	0.0059
Interim Retirements 2009-2022	138,558	5,109,176	2,002,497	121,019	63,089
Unit 1 Balance at 2023	6,047,061	22,537,880	10,017,293	2,215,257	700,701

Note: Big Sandy Plant is not identified by unit in the property record. Therefore only plant balances prior to the in-service date of Unit 2 in 1969 were used to determine the amount to retire for Unit 1.

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KENTUCKY POWER COMPANY
DEPRECIATION STUDY AS OF 12-31-08
STEAM PRODUCTION PLANT WORKPAPERS

INTERIM SALVAGE AND REMOVAL ANALYSIS

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KENTUCKY POWER COMPANY
 Depreciation Study as of December 31, 2008
 Analysis of Removal and Salvage Activity from 1994 through 2008
 Steam Production Plant

<u>Year</u>	<u>Original Cost Retired</u>	<u>Gross Cost of Removal</u>	<u>Gross Salvage</u>
1994	3,969,598	2,038,522	60,472
1995	6,338,609	2,274,820	1,919,772
1996	2,883,635	2,268,116	-108,297
1997	8,213,501	1,652,784	1,622,235
1998	1,885,004	2,094,579	-109,746
1999	474,672	8,266	3,780
2000	855,616	203,653	1,711
2001	543,659	-80,513	172,103
2002	875,114	55,395	30,879
2003	17,253,619	1,578,174	-28,698
2004	3,134,846	4,362,183	39,640
2005	1,385,399	712,514	-561
2006	3,420,486	979,945	-336
2007	3,874,545	1,820,214	60,127
2008	<u>5,908,590</u>	<u>936,547</u>	<u>97,941</u>
Total	<u>61,016,893</u>	<u>20,905,199</u>	<u>3,761,022</u>
Percent		34%	6%

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KENTUCKY POWER COMPANY
DEPRECIATION STUDY AS OF 12-31-08
STEAM PRODUCTION PLANT WORKPAPERS

DEMOLITION REPORT

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American Electric Power Company
Big Sandy Power
LOUISA, KY

Dismantling Information

October 13, 2009

**BIG SANDY AEP POWER PLANT
CONCEPTUAL DEMOLITION PLAN**

DEFINITIONS:

ACM

Asbestos Containing Material

CFC's

Chlorofluorocarbons.

Construction / Demolition Debris

Any solid waste resulting from the construction, remodeling, repair, or demolition of structures. Such wastes may include, but not limited to, brick, stone, and concrete.

Contractor

The individual, partnership or corporation with which AEP Company enters into a contract to perform all of the work described in the Specification.

Contract

A purchase order placed by Purchaser and accepted by Contractor, together with this Specification and all other documents referred to in such purchase order, or a formal contract executed by Purchaser and Contractor, together with this Specification and all other documents referred to in such formal contract.

Engineer

The Engineer or his authorized representative designated by AEP Company to be assigned to this contract.

Fill Material

Material to be used to bring area to grade. Material shall meet the requirements of all applicable Federal and/or State rules and/or regulations. Material shall also meet the requirements of the Engineer.

Greases

Any used or unused greases or waste containing grease.

Hazardous Substance

This definition shall be the same definition as found in CERCLA Section 101(14), and shall include but limited to any substance or pollutant defined under Sections 311(b)(2)(A) and 307(a) of the Federal Water Pollution Control Act, Section 102 of CERCLA, Section 3001 of the Solid Waste Disposal Act and Section 112 of the Clean Air Act.

Hazardous Waste

Hazardous waste as defined in 40 CFR 261.3 or as defined in any applicable state regulation.

HAZMATs

Any hazardous, toxic or regulated substance controlled under RCRA, CERCLA or any other Federal, State, or Local law, statute, regulation or ordinance pertaining to the handling, transportation, or disposal of any controlled substance.

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Industrial Process Waste

Any solid waste generated by manufacturing or industrial process waste that is not a hazardous waste. Such waste may include, but not limited to, refractory brick, fire clay refractory earth brick, and ceramic block.

Landfill

River City Disposal
1837 River Cities Drive
Ashland, KY 41102

MSDS

Material Safety Data Sheet.

ODCS

Ozone Depleting Chemicals as defined under Title VI of the CAA Amendments of 1990

Oils

Any used or unused hydraulic, lubrication, rolling, waste or other such oil or oily waste.

OSHA

Occupational Safety and Health Act and amendments thereto.

PCBs

Polychlorinated By-phenols.

Process Materials

Any raw materials, blended raw materials, recyclable process generated dusts (such as flue dust), fly ash, ash slurry and etc.

RACM

Regulated Asbestos Containing Material as defined in 40 CFR 61, Subpart M and any other applicable Federal, State, and/or Local rules, regulations and/or ordinances.

Scrap

All ferrous scrap designated by the Engineer to be suitable for melting at a steel processing plant.

Structural Removal

As in the Specification, shall mean all work of every nature described herein, implied herein, or necessary to complete the work described or implied herein, with the exception of Asbestos Abatement.

AEP Company

American Electric Power Company

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American Electric Power Company
Big Sandy Power
LOUISA, KY

Information Sheets

Dismantling Information

October 13, 2009

BIG SANDY POWER

-
1. GENERAL SCOPE OF WORK
 - 1.1. The work to be performed under the terms of this specification shall consist of the dismantling and removal of all facilities, machinery, equipment, all associated structures, foundations, debris, asbestos containing materials, hazardous substances and hazardous waste as directed by the Engineer. Upon completion each dismantling site shall be left in a neat, clean, safe condition.
 - 1.2. Work under this specification shall be performed in accordance with the terms and conditions of the Contract, entered into between AEP Company and the Contractor, and in accordance with all EPA, OSHA, Federal, State, County, and Local laws, statutes, ordinances, and regulations.
 - 1.3. The Contractor shall perform all utility disconnection and/or relocation work which is necessary to complete the proposed dismantling and removal work, without disrupting active utilities.
 - 1.4. The Contractor shall perform all excavation, back-filling, construction and closure work which is necessary to complete the proposed dismantling work.
 - 1.5. The Contractor shall provide all labor, materials, equipment, services and pay all necessary taxes, in addition to securing all required permits, to perform the dismantling.
 - 1.6. The Contractor is responsible to clean up and dispose of any and all materials which are generated as a result of a spill caused by the Contractor, or which are generated as a result of the improper handling of any materials by the Contractor. This includes all RACM, Hazardous Substances, Hazardous Waste, Special wastes, Non-process Debris, Demolition Debris, and combustible materials.
 2. FACILITY DISMANTLEMENT AND RELATED WORK
 - 2.1. Perform the environment abatement of the following:
 - 2.1.1. Vacuum the inside area of Unit 1 Boiler
 - 2.1.2. Chemical sweep of structures, tanks and pipe in Unit 1 Boiler area
 - 2.1.3. Abate tank insulation in Unit 1 Boiler along with all connected pipes
 - 2.1.4. Abate Unit 1 Boiler, boiler breeching and piping
 - 2.1.5. Abate Unit 1 Boiler building siding, office and turbine building siding, Unit 1 coil conveyor, Unit 1 coil conveyor transfer building, Unit 1 train coal unload station house and miscellaneous outside structures.
 - 2.1.6. Remove Units 1 fluorescent light bulbs, PCB ballast, mercury vapor light, HID vapor lights and mercury containing instruments.
 - 2.1.7. Vacuum the inside area of Unit 2 Boiler

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- 2.1.8. Chemical sweep of structures, tanks and pipe in Unit 2 Boiler area
- 2.1.9. Abate tank insulation in Unit 2 Boiler along with all connected pipes
- 2.1.10. Abate Unit 2 Boiler, boiler breeching and piping
- 2.1.11. Abate Unit 2 miscellaneous outside structures.
- 2.1.12. Remove Unit 2 fluorescent light bulbs, PCB ballast, mercury vapor light, HID vapor lights and mercury containing instruments.
- 2.1.13. Remove storage building fluorescent light bulbs, PCB ballast, mercury vapor light, HID vapor lights and mercury containing instruments.
- 2.1.14. Remove the secondary and primary river water pump house building fluorescent light bulbs, PCB ballast, mercury vapor light, HID vapor lights and mercury containing instruments.
- 2.2. Perform the building dismantling, equipment removal, concrete removal to surrounding grade elevation of the following.
 - 2.2.1. Unit 1 boiler building, turbine generator building, precipitators, office and maintenance building, coal conveyor.
 - 2.2.2. Unit 2 boiler building, turbine generator building, precipitators, office and maintenance building the chemical lab building, coal conveyor to Unit 2 coal pile the SCR building and the Unit 1 & 2 concrete smoke stack.
- 2.3. Perform the removal of the following to grade elevation.
 - 2.3.1. Unit 1 water cooling tower structure, adjacent pump structures, adjacent condensate water tank to surround grade elevation. Fill the pits and trenches to surround grade elevation.
 - 2.3.2. The pump house and metal cleaning waste treatment tank located west of Unit 1 boiler building.
 - 2.3.3. The coal train car unload building, adjacent control building, the coal conveyor and coal transfer and sampling building.
 - 2.3.4. The tractor shed and locomotive house building.
 - 2.3.5. The remains of the standby river water make-up equipment, railroad ties and pipes to the Big Sandy River.
 - 2.3.6. The in-service sanitary treatment equipment, trenches and tanks located adjacent to the Big Sandy River.
 - 2.3.7. The secondary and primary river water pump building structures, the two electrical control buildings. Remove building and water intakes to surrounding grade elevation. Install a barricade in the water inlet from the Big Sandy River. Remove the water inlet screens from the river.
 - 2.3.8. The ammonia storage building and chemical manufacturing building structure and ammonia storage tank structures.
 - 2.3.9. The 500,000 gallon fuel oil tank and oil pump station. Remove the oil tank dyke down to surround grade elevation.
 - 2.3.10. The six single story maintenance, storage and office buildings located south of the Unit 2 boiler building.
 - 2.3.11. The Unit 2 water cooling tower structure, adjacent pump structures, adjacent clean condensate water tank, dirty condensate water tank, the fire water control building, the sulfuric acid storage and control building, the chlorine tank and control building to surround grade elevation. Fill the pits and trenches to surround grade elevation.
 - 2.3.12. The Unit 2 coal conveyor from the coil pile to the Unit 2 boiler.
 - 2.3.13. The coal train unload building, coal conveyor from the unload building to the coal transfer building to the coal storage area. Remove all bents and transfer building to surround grade elevation. Remove the coal

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truck unload equipment from grade elevation to the bottom of the pit. Fill the truck unload pit and the coal train unload pit to surrounding grade elevation. Fill the pit from the coal train station to the coal conveyor exit with fill material to surround grade elevation.

- 2.3.14. The coal system sample building, trailer and sample equipment to surrounding grade elevation.
- 2.3.15. The coal system transportation office and maintenance building located east of the coal storage area.
- 2.3.16. The two truck scales, control building, and coal train car warming structure and equipment down to surrounding grade elevation.
- 2.3.17. The abandoned 3,400,000 gallon fuel storage tank. Remove the dyke wall surrounding the fuel tank to surrounding grade elevation. Remove all pumps, pipe, wires, and controls from the tank area to the Unit 2 boiler structure.
- 2.3.18. Remove the maintenance parts storage building located north of the Unit 2 turbine building.
- 2.3.19. Remove the electrical wire, and electric towers from the transformers located adjacent to Unit 2 boiler building to the 345,000 volt electrical station located north of highway 23.

3. WORK BY CONTRACTOR

The Contractor Shall:

- 3.1. Furnish all supervision, labor, materials, tools, supplies and equipment necessary to perform the work, including dismantling and removal of all the facilities, equipment, structures, etc. noted herein with the exception of specific structures which are designated in this Specification to remain.
- 3.2. Furnish on the site, during the performance of the work, an experienced supervisor who shall be duly authorized to represent and act for the Contractor in all matters pertaining to the work covered by this Specification.
- 3.3. Provide all written instructions, orders, and other communications delivered to the Contractor's construction office shall be considered as having been delivered to the Contractor himself.
- 3.4. Develop detailed written demolition plans for each area to be dismantled, and submit them to the Engineer for his review prior to the start of work in an area. Such plans shall include, but limited to:
 - 3.4.1. A detailed and complete schedule for the performance of the work.
 - 3.4.2. A survey of each area, identifying all materials to be disposed of other than scrap and equipment.
 - 3.4.3. Identification and protection of demolition areas.
 - 3.4.4. Termination and/or relocation of utilities.
 - 3.4.5. Asbestos abatement and disposal.
 - 3.4.6. Handling and disposal of hazardous wastes and materials.
 - 3.4.7. Handling and disposal of oils and greases.
 - 3.4.8. Handling and disposal of non-hazardous debris and materials.
 - 3.4.9. Handling and disposal of ODC's.
 - 3.4.10. Fire prevention and protection.
 - 3.4.11. Handling and storage locations for ferrous and non-ferrous scrap.
 - 3.4.12. Method of demolition and/or equipment removal.
 - 3.4.13. Clean-out, breaking open, and filling of basements, pits, and tunnels.
 - 3.4.14. Final grading and restoration of demolition site.
- 3.5. Clear each site of existing equipment, structures, and material designated to be removed. Each site will be left in a neat, clean, safe condition in conformity with all applicable Federal, State, or Local laws, statutes and/or regulations, including

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but not limited to CAA, OSHA, RCRA, SARA, TSCA, and/or CERCLA. The finished condition of each site will be approved by the Engineer.

- 3.6. Remove all structures down to final grade except where otherwise noted. Final grade will generally be the adjacent grade surrounding the facility to be removed. The removal of concrete & debris and grading will be done concurrent with the demolition work. As one area is cleared of structures, the required concrete removal work in that area will be done simultaneously with the demolition of structures in the next area of work. If the Contractor breaches the provisions of this section AEP Company reserves the right, in AEP Company's sole opinion, to stop the Contractor from doing further demolition until the concrete and debris removal is current.
- 3.7. Perform all material removal and asbestos abatement work in accordance with all applicable Federal, State, and/or Local rules, regulations and/or ordinances, which is necessary to complete the proposed removal work.
- 3.8. Perform all utility, telecommunications and telemetering disconnection and/or relocation work which is necessary to complete the proposed removal work.
- 3.9. Prior to beginning demolition of any facility, Contractor shall ascertain that no live utilities remain in the facility and identify and locate all underground utilities. It shall be the Contractor's exclusive responsibility to determine that all utility systems in each area remain isolated from active utility systems.
- 3.10. Perform all excavation, back-filling, construction and closure work which is necessary to complete the proposed dismantling and removal work.
- 3.11. Remove all debris generated as a result of the proposed removal work.
- 3.12. Break the floors of all pits, trenches and depressions sufficiently to provide drainage and to prevent the accumulation of water within the underground structure.
- 3.13. Tunnel and basement roof structures which do not support structures designated to remain and which are located less than 3 feet below finish grade elevation will be broken in. Said tunnel excavations will be filled with fill materials approved by the Site Engineer up to finish grade elevation.
- 3.14. Properly drain and capture all contents of pipelines prior to dismantling any pipelines.
- 3.15. Empty and shovel clean all pits, sumps, basements, and depressions to the satisfaction of the Engineer. Areas will be inspected by the Site Engineer prior to filling. Any pits, sumps, basements or depressions in contact with a hazardous waste or PCB shall be decontaminated in accordance with any applicable Federal and/or State rules and/or regulations.
- 3.16. Back-fill all pits, sumps, and depressions up to existing grade. Each site shall be rough graded and left in a neat, clean, safe condition. Contractor will use fill material approved by the Engineer. The final six inches of fill shall be other select fill material approved by the Engineer.
- 3.17. Furnish all fill material in accordance with the Specification. If the work activity generates more fill material than needed, the Contractor shall pay for the transportation and disposal off site. If the work activity is fill negative, the Contractor shall pay for the purchase and transportation of required fill to the site. Such purchased material shall be approved by the Site Engineer.
- 3.18. Furnish portable sanitary facilities and drinking water for Contractor's personnel in areas of removal.
- 3.19. Furnish electric power and temporary lighting in those areas of removal where active utilities are not available.
- 3.20. Provide adequate protective barriers for open pits, holes and depressions, as a result of the equipment removal work, until they are properly backfilled. Temporary barricades shall conform to all applicable Federal, State and Local, rules and regulations or standards including, but not limited to OSHA.
- 3.21. Remove above ground utility support systems such as poles, structural steel towers or guy wires which have been designated to be removed by the Engineer.
- 3.22. Remove and scrap all tanks, including supporting steel and concrete structures. Prior to removal work Contractor shall remove the contents of each tank, drain each tank and otherwise purge each tank in accordance with all applicable rules or regulations to render them safe for removal. Notify Engineer of any potentially contaminated soils. Remove of these

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tanks shall conform to all applicable Federal, State, and Local laws, statutes, regulations or ordinances.

- 3.23. Secure the approval of local Fire Department for the Fire Prevention Plan. Contractor shall meet with representatives of the Fire Department prior to commencement of work on each facility. Prior to the commencement of removal work, Contractor shall inspect all fire hydrants in the work area and shall notify the Engineer of those that are not in good operating condition.
- 3.24. Provide fire extinguishers and fire hoses as required to immediately control any fires resulting from the work. Implement all fire prevention measures as directed by the Fire Department. Measures required by Fire Department may include, but will not be limited to, the maintenance of pressurized fire hoses at each removal site.
- 3.25. Attend a safety meeting with AEP Company's representatives prior to starting work in each facility or designed area.
- 3.26. Furnish all temporary or permanent supports or protective devices which are necessary to preserve active pipes, electrical lines or other structures which AEP Company designates to remain in place.
- 3.27. Abide by AEP Company Contractor Safety Responsibilities, AEP Company Energy Control-Lockout and Tryout Rules, as well as all Federal, State, and Local regulations.
- 3.28. Secure the Engineer's approval prior to using any railroad track or mobile crane movements to or from the dismantling site.
- 3.29. Schedule rail movements, order all railroad cars and be solely responsible for demurrage charges resulting from the Contractor's operations.
- 3.30. Where Contractor removes railroad track, the Contractor shall remove all wooden and concrete ties, and load and transport them to an approved disposal site approved by the Engineer. Contractor shall be responsible for the cost of all removal, loading, transportation, and disposal of such material.
- 3.31. ACM ABATEMENT
 - 3.31.1. Contractor shall provide all supervision, labor, consumable materials, tools, equipment, documentation, services and permits required to identify, remove, and dispose of all ACM located on, in, adjacent to or forming a part of each structure designated for removal. RACM removal work shall include but is not necessarily limited to the work described herein.
 - 3.31.2. Prepare a complete, written ACM removal plan for each dismantling site. Contractor shall obtain and analyze all bulk sample analyses of any suspect RACM. Prior to the commencement of work, Contractor shall provide the Engineer with the results of the analyses and Contractor's removal plan.
 - 3.31.3. Provide all respirators, protective clothing and equipment required to protect all personnel associated with the RACM removal work. All respirators, protective clothing and equipment shall conform to all applicable rules, regulations, and standards, including but not limited to OSHA.
 - 3.31.4. Employ only competent persons, trained, knowledgeable and qualified in the techniques of abatement, handling and disposal of RACM and subsequent cleaning of contaminated areas. Employees who perform RACM removal work shall possess current, valid asbestos abatement licenses as required by any governmental agency having jurisdiction over the work.
 - 3.31.5. Perform all RACM removal in strict accordance with all applicable Federal, State, and Local laws, statutes, ordinances and regulations. Contractor shall provide timely and accurate notification in accordance with all Federal, State, and Local laws, statutes, and regulations and ordinances.
 - 3.31.6. Adequately wet all friable RACM prior to removal. Adequately wet RACM debris shall be packaged in bags provided by Contractor. Bags of ACM debris shall promptly be placed in dumpster boxes provided by Contractor.
 - 3.31.7. Haul all RACM debris from each RACM removal site to the disposal site approved by AEP Company. Contractor shall unload RACM at the disposal site. All transportation of RACM shall be performed in enclosed dumpster boxes.
 - 3.31.8. Be responsible for any spilling, escape or release of RACM which occurs during the transportation of RACM to

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the disposal site. AEP Company shall be responsible for any spilling, escape or release of RACM which occurs after the RACM has been unloaded by Contractor at the disposal site approved by AEP Company. Contractor shall immediately report to AEP Company any spilling, escape or release of RACM which occurs during the transportation of RACM. Contractor shall submit copies of reports of spilling, escape or release of RACM to all authorities as required by Federal, State or Local laws, statutes, regulations and ordinances.

- 3.31.9. Maintain complete and accurate records of all removal, transportation and disposal activities in accordance with all Federal, State and Local laws, statutes, regulations and ordinances. Contractor shall submit copies of all such records to AEP Company on a daily basis.
- 3.31.10. Perform personal and area air monitoring as necessary to assure the safety of all persons associated with the removal of ACM and as required by Federal, State and Local laws, statutes, regulations and ordinances. Contractor shall perform environmental air monitoring in the area at each location where RACM removal work is performed. Environmental air monitoring shall conform to all applicable Federal, State, and Local laws, statutes, regulations and ordinances.

3.32. HAZARDOUS WASTE HANDLING AND DISPOSAL

- 3.32.1. Contractor shall provide all supervision, labor, consumable materials, tools, equipment, documentation, services and permits required to identify, remove and load any hazardous waste located in, adjacent to or forming a part of the equipment designated for removal. Contractor shall be responsible to perform all in-plant handling of such materials, including, but not limited to removal, loading, and in-plant transportation. Hazardous waste removal work shall include, but is not necessarily limited to, the work described herein.
- 3.32.2. Contractor is required to secure samples of all materials, which are suspected of being a hazardous waste, located in the areas defined in this Specification. Samples shall be collected in accordance with all applicable regulations. Contractor shall deliver all samples of suspected hazardous waste to the Engineer. AEP Company shall secure required analyses of all such samples.
- 3.32.3. Prepare a complete written hazardous waste removal plan for each work site that will be submitted to the Engineer for his review prior to the start of work in an area.
- 3.32.4. Contractor shall provide all respirators, protective clothing and equipment required to protect all personnel associated with the handling or removal of any Hazardous Wastes. All said respirators, protective clothing and equipment shall conform to all applicable rules, regulations and standards, including but not limited to OSHA.
- 3.32.5. Employ only competent persons, trained, knowledgeable and qualified in the techniques of handling and disposal of hazardous wastes and subsequent cleaning of contaminated areas. Employees who perform hazardous waste removal work shall possess current, valid licenses as required by any government agency having jurisdiction over the work. Perform all hazardous waste removal in strict accordance with all applicable Federal, State and Local laws, statutes, ordinances and regulations. Contractor shall provide timely and accurate notification in accordance with all Federal, State and Local laws, statutes, regulations and ordinances.
- 3.32.6. Contractor shall post all appropriate warning signs at each work area, as is required by applicable regulations.
- 3.32.7. Contractor shall be solely responsible for any spills, releases, escapes or improper handling of hazardous wastes caused by the Contractor (or by their approved subcontractor). Contractor shall pay all penalties, clean up, and disposal costs incurred as a result of improper handling by Contractor. Contractor shall immediately report any spilling, escape or release of any hazardous waste to the Engineer in accordance with Section 6.48 of the Specification.
- 3.32.8. Maintain complete and accurate records of all removal activities in accordance with all Federal, State, and Local laws, statutes, regulations and ordinances. Contractor shall submit copies of all such records to AEP Company on a weekly basis.
- 3.32.9. Perform personal monitoring as necessary to assure the safety of all persons associated with the removal of hazardous wastes and as required by Federal, State, and Local laws, statutes, regulations and ordinances. If so required, Contractor shall perform environmental air monitoring in the area of each location where hazardous

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waste removal work is performed. Environmental air monitoring shall comply with applicable Federal, State, and Local laws, statutes, regulations and ordinances.

3.32.10. AEP Company shall be responsible for disposal, the method of disposal and the disposal site for all identified hazardous waste except asbestos waste. Contractor shall load all such wastes into trucks or containers provided by AEP Company.

3.33. COMBUSTIBLE DEBRIS

3.33.1. Contractor is responsible for identification, (including sampling and testing if required), removal, transportation, and disposal of all combustible debris located in the areas defined in this Specification, or which are generated by the Contractor in the performance of the work defined herein.

3.33.2. Contractor shall dispose of all combustible debris to a licensed off-plant disposal site. Such disposal site shall be approved by the Engineer.

3.34. CONSTRUCTION / DEMOLITION WASTE

3.34.1. Contractor is required to perform the work described herein in a manner that will separate construction / demolition waste from ferrous scrap, combustible waste, non-ferrous scrap, ferrous scrap, process demolition waste, oils and greases, hazardous wastes, and all other materials.

3.34.2. Contractor shall identify all quantities of construction / demolition waste to the Engineer. The Engineer shall positively identify all such materials as being construction / demolition waste.

3.34.3. For all materials which have been positively identified by the Engineer as construction / demolition waste, Contractor shall use such materials as clean fill in locations approved for filling by the Engineer.

3.34.4. Contractor shall be responsible to perform all in-plant handling of such materials, including, but not limited to, screening, separation, from other materials, loading, crushing and transportation.

3.34.5. Contractor shall be responsible for any costs that are incurred as a result of his handling construction / demolition waste, including, but not limited to, sampling, analysis, permit applications, loading, on and off-site transportation, and disposal at an approved disposal site.

3.35. OILS

3.35.1. Contractor is required to secure samples of all oils and oily wastes located in the areas defined in this Specification. Samples shall be collected in accordance with all applicable regulations.

3.35.2. AEP Company shall secure analyses required by the applicable regulations, or by the disposal facility, of all such samples, including, but not limited to, analysis for PCB contamination.

3.35.3. For all oils which have been positively identified as being free of PCB contamination (i.e. less than 50 ppm), Contractor shall be responsible to perform all handling of such materials, including, but not limited to, removal, clean up, loading and transportation.

3.35.4. Contractor shall be responsible to pay for fees to dispose of all oils and oily waste in accordance with all applicable regulations. The Engineer shall approve all methods of disposal and disposal sites for all oils and oily waste.

3.36. GREASES

3.36.1. Contractor is required to secure samples of all greases and wastes containing grease located in the areas defined in this Specification. Samples shall be collected in accordance with all applicable regulations.

3.36.2. AEP Company shall secure analyses required by the applicable regulations, or by the disposal facility, of all such samples.

3.36.3. Contractor shall be responsible to perform all handling of such materials, including, but not limited to, removal, clean up, loading, and transportation.

3.36.4. AEP Company shall be responsible for the disposal of all special and hazardous greases and waste containing

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greases in accordance with all applicable regulations.

3.37. PROCESS MATERIALS

- 3.37.1. Contractor is required to perform the work described herein in a manner that will separate process demolition debris from ferrous scrap, combustible debris, non-ferrous scrap, construction / demolition waste, oils and greases, hazardous wastes, and all other materials.
- 3.37.2. Prior to the start of demolition in an area, Contractor shall identify all quantities of process materials to the Engineer. The Engineer shall positively identify all such materials as being process materials.
- 3.37.3. Contractor is required to secure samples of all process materials located in the areas defined in this Specification. Contractor must provide samples to the Engineer with sufficient lead time so as not to interfere with the dismantling work.

3.38. PCBs AND EQUIPMENT CONTAINING PCBs

- 3.38.1. Prior to dismantling, Contractor shall conduct a survey of each dismantling area to locate and identify any electrical or hydraulic equipment which has not been clearly identified as being free of PCB contamination and, therefore, may contain PCBs. Contractor shall provide the Engineer with the location and description of any surveyed equipment which may contain PCBs. Where so directed by AEP Company, Contractor shall provide AEP Company with a sample of the oil contained in the piece of equipment. AEP Company will secure analysis and provide Contractor with the written results.
- 3.38.2. Prior to dismantling the facility, the Contractor shall remove, intact each piece of PCB contaminated equipment. Contractor shall transport said PCB equipment to AEP Company's designated PCB storage facility. Contractor shall schedule and coordinate said deliveries with the Engineer. Alternatively, at the direction of the Engineer, Contractor shall load PCB equipment onto vehicles provided by AEP Company. Contractor shall schedule and coordinate said loading with the Engineer. Contractor shall schedule and coordinate the pumping and removal of PCB dielectric fluid from transformers prior to loading when so directed by the Engineer.
- 3.38.3. AEP Company shall be responsible for the disposal of all PCB equipment and fluids.
- 3.38.4. Contractor shall be solely responsible for any spills, releases, escapes, or improper handling of the hazardous substance caused by the Contractor. Contractor shall pay all penalties, clean up, and disposal costs incurred as a result of improper handling by Contractor. Contractor shall immediately report any spilling, escape, or release of any hazardous substance to the Engineer in accordance with Section 6.48 of the Specification.

3.39. ODC's:

- 3.39.1. Prior to dismantling, Contractor shall conduct a survey to locate and identify any equipment which may contain ODCs, including, but not limited to CFCs. Contractor shall provide the engineer with the location and description of any surveyed equipment which may contain ODCs.
- 3.39.2. Prior to dismantling the facility, the Contractor shall remove, intact, any piece of equipment which contains ODCs. Contractor shall transport said ODC containing equipment to a designated location.
- 3.39.3. Contractor shall be responsible for the removal and disposal of ODCs from equipment in accordance with all applicable regulations. Contractor shall provide the Engineer with documentation showing proper removal and disposal.
- 3.39.4. Contractor shall be responsible for the disposal of all equipment after all ODCs have been properly removed.
- 3.39.5. Contractor shall be solely responsible for any spills, releases, escapes, or improper handling of ODCs caused by the Contractor (or by their approved subcontractor). Contractor shall pay all penalties, clean up, and disposal costs incurred as a result of improper handling by Contractor. Contractor shall immediately report any spilling, escape, or release of any ODCs to the Engineer in accordance with Section 6.48 of this Specification.

3.40. PIPING SYSTEMS

- 3.40.1. Prior to the commencement of dismantling work, Contractor shall identify, plan and perform all piping shut

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offs, disconnections, and relocation work necessary to complete the work specified in a safe, orderly manner.

- 3.40.2. Piping shall be purged (where necessary) and shall be removed to a point of origin as designated by the Engineer.
- 3.40.3. Contractor shall submit plans, procedures and working drawings showing design details for all piping work to the Engineer for review. Contractor shall secure the Engineer's review of all designs, plans and procedures prior to the commencement of work. The correctness of the design shall remain the Contractor's responsibility.
- 3.40.4. Contractor shall provide all supervision, labor, materials, tools and equipment necessary to complete all piping work required for the work as specified herein. Contractor shall be responsible for the identification of all piping construction, disconnection and relocation work which will be required to complete all work specified herein.
- 3.40.5. Contractor shall perform all piping construction, disconnection and relocation work using methods which will not interrupt AEP Company's ongoing operations.
- 3.40.6. Secure the Engineer's permission prior to any utility outage. In the absence of the Engineer's approval of Contractor's proposed outage, Contractor shall perform the proposed work on live pressurized lines.

3.41. ELECTRICAL SYSTEMS

- 3.41.1. Prior to the commencement of dismantling work, Contractor shall identify, plan and perform all electrical shut offs, disconnections, and relocation work necessary to complete the work specified in a safe and orderly manner.
- 3.41.2. Conduit, cable, wireways, and buss shall be removed to a point of origin as designated by the Engineer.
- 3.41.3. Contractor shall submit plans, procedures and working drawings showing design details for all electrical and related work to the Engineer for review. Contractor shall secure the Engineer's review of all designs prior to the commencement of work. The correctness of design shall remain the Contractor's responsibility.
- 3.41.4. Contractor shall provide all supervision, labor, materials, tools and equipment necessary to complete all electrical, telecommunication and telemetering work required for the dismantling work specified herein. Contractor shall be responsible for the identification of all electrical, telecommunication and telemetering construction, disconnection and relocation work which will be required to complete all work specified herein.
- 3.41.5. Contractor shall perform all electrical construction, disconnection and relocation work using methods which will not interrupt AEP Company's ongoing operations.
- 3.41.6. Contractor shall secure the Engineer's permission prior to any utility outage. In the absence of the Engineer's approval of Contractor's proposed outage, Contractor shall perform the proposed work on live energized lines.

4. WORK BY PURCHASER:

AEP Company Shall:

- 4.1. Provide Material Safety Data Sheets (MSDS) in accordance with OSHA "Right to Know" regulations for each substance listed under said regulations.
- 4.2. Provide, where available, utility services such as 460 Volt, 3 phase, 60 Hz power, 250 Volt DC current, potable water, oxygen, compressed air, or natural gas, which are deemed available by AEP Company. Contractor may, at his own expense and approval of the Engineer, make necessary connections provided there is no interruption to normal production operations. AEP Company assumes no responsibility or liability for loss of, or damage to, the equipment or materials of the Contractor or his subcontractors. Contractor will pay charges that may be assessed. The assessment of charges and/or the availability of utilities may change through the course of the contract as determined.
- 4.3. Provide existing railroad tracks, railroad tracks sidings, and roadways on plant site, if available, for Contractor's use when and where the Engineer may designate. Contractor shall keep traffic lanes free of congestion so as to avoid interference with normal plant operations.

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- 4.4. Provide one copy of all available drawings necessary for the completion of the work specified. These drawings are to be used by the Contractor for reference only in the performance of the work. Said drawings are not to be construed as a complete description of the Scope of Work, nor as fully depicting existing conditions. Additional copies may be purchased by Contractor through the Purchaser.
 - 4.5. Approve the selection of all subcontractors before they will be allowed to enter the job site and perform work. Subcontractors are subject to all applicable terms and conditions contained herein.
 - 4.6. Provide written releases for the demolition of each specific area or facility as identified in the Schedule of Values. Demolition shall not commence without the receipt of said release.
 - 4.7. Assign to Contractor ownership of each facility to be dismantled. The assignment shall include:
 - 4.7.1. All ferrous and non-ferrous scrap resulting from the dismantling work
 - 4.7.2. All ferrous and non-ferrous scrap located within each dismantling area as identified by Engineer during the site visitation.
 - 4.7.3. Spare parts and/or spare equipment.
 - 4.7.4. All railroad track designated for removal.
 - 4.7.5. All vehicles and mobile equipment located within each dismantling area as identified in the Specification.
 - 4.8. AEP Company will maintain ownership of all real estate
5. Pricing
- 5.1. Environmental Abatement
\$4,000,000
 - 5.2. Demolition of Unit 1, 2, cooling towers, stacks, buildings, railroad tracks and tanks
\$9,000,000
 - 5.3. Capping of bottom and slurry ash ponds
\$30,000,000

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KENTUCKY POWER COMPANY
DEPRECIATION STUDY AS OF 12-31-08
STEAM PRODUCTION PLANT WORKPAPERS

CALCULATED ACCUMULATED DEPRECIATION

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KENTUCKY POWER COMPANY
 DEPRECIATION STUDY AS OF DECEMBER 31, 2008
 CALCULATED DEPRECIATION RESERVE
 STEAM PRODUCTION PLANT

ACCOUNT	PLANT BALANCE AT 12-31-08	AVERAGE AGE	AVERAGE REM. LIFE	AVERAGE LIFE	NET SALVAGE	% REM. LIFE TO AVG. LIFE	CALCULATED RESERVE %	CALCULATED RESERVE W/O NET SALVAGE	CALCULATED RESERVE WITH NET SALVAGE
BIG SANDY									
311	40,583,921	26.29	19.27	45.56	-9%	42.30%	57.70%	23,418,597	25,526,271
312	355,237,890	12.32	17.43	29.75	-14%	56.59%	41.41%	147,110,279	167,705,718
314	104,506,857	16.55	17.44	33.99	-15%	51.31%	48.69%	50,885,216	58,517,998
315	15,303,286	29.20	18.86	48.06	-10%	39.24%	60.76%	9,297,877	10,227,664
316	<u>6,518,954</u>	23.20	18.68	41.88	-14%	44.60%	55.40%	<u>3,611,264</u>	<u>4,116,841</u>
Total	<u>522,150,908</u>							<u>234,323,233</u>	<u>266,094,492</u>

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KENTUCKY POWER COMPANY
DEPRECIATION STUDY AS OF 12-31-08
TRANSMISSION PLANT WORKPAPERS

LIFE ANALYSIS

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KENTUCKY POWER COMPANY
 Depreciation Study as of December 31, 2008
 Transmission Plant

Account	<u>3502 RIGHTS OF WAY</u>	
Depreciable Balance	\$23,482,119	
	<u>Current</u>	<u>Recommended</u>
Average Service Life (Yrs)	75	75
lowa Curve	R4.0	R4.0
Gross Removal, %		0%
Gross Salvage, %		0%
Net Salvage %	0%	0%

 An actuarial analysis was not performed on this account because of the minimal retirements.
 The recommendation is to continue the current average service and retirement dispersion
 for this account.

Retirements from this account should not be expected to incur removal costs or receive any salvage.

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KENTUCKY POWER COMPANY
 Depreciation Study as of December 31, 2008
 Transmission Plant

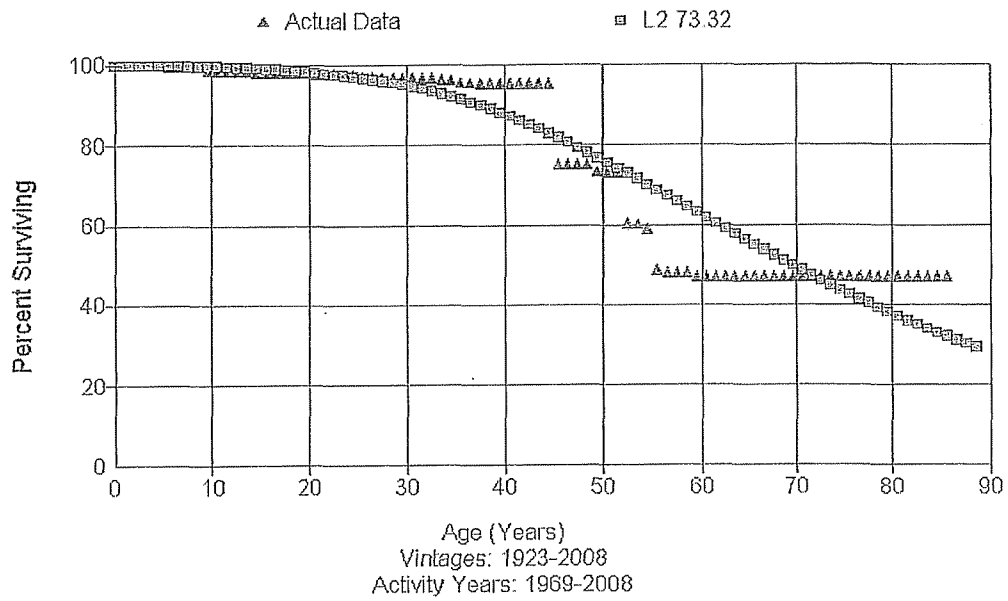
Account	<u>352 STRUCTURES & IMPROVEMENTS</u>	
Depreciable Balance	\$6,369,900	
	<u>Current</u>	<u>Recommended</u>
Average Service Life (Yrs)	55	73
Iowa Curve	S1.5	L2.0
Gross Removal, %		0%
Gross Salvage, %		10%
Net Salvage %	0%	10%

The 40 year band analysis of the account shows the best fit curve is an L2.0 with a 73 year average service life. Due to minimal retirement experience in the 20 year and 10 year bands, the actuarial analyses were not meaningful.

Retirements from the structures account should provide some salvage but no measureable removal costs would be expected.

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Account: KEPCo 101/6 352 - KY
Scenario: KEPCO TRANSMISSION 2008



Actuarial Life Analysis

Account: KEPCo 101/6 352 - KY
Scenario: KEPCO TRANSMISSION 2008
Placement Band: 1923 - 2008
Function: Survivorship Annual Rate Method
Weighting: Unweighted
T-Cut: None

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Observation	Censoring		Error Sum	Best Fit	
Band	Age	Percent	of Squares	Disp	ASL
1969 -2008	85.5	46.97	0.49268125	L2	73.32

Observed Life Table

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Scenario: KEPCO TRANSMISSION 2008
 Account: KEPCo 101/6 352 - KY
 Placement Band: 1923 - 2008

Observation Band: 1969 - 2008

Age at Beginning of Interval	Exposures at Beginning of Interval	Retirements During Interval	Refirement Ratio	Survivor Ratio	Percent Surv at Beginning of Interval
0	6,292,828.06	0.00	0.00000	1.00000	100.00
0.5	6,184,874.74	0.00	0.00000	1.00000	100.00
1.5	6,201,894.40	0.00	0.00000	1.00000	100.00
2.5	6,237,136.40	1,954.00	0.00031	0.99969	100.00
3.5	6,173,534.45	1,667.00	0.00027	0.99973	99.97
4.5	6,180,313.45	3,388.00	0.00055	0.99945	99.94
5.5	6,197,626.45	2,007.00	0.00032	0.99968	99.89
6.5	5,401,409.10	1,459.00	0.00027	0.99973	99.86
7.5	5,400,005.93	1,986.00	0.00037	0.99963	99.83
8.5	5,316,655.55	61,166.00	0.01150	0.98850	99.79
9.5	5,241,108.40	5,840.00	0.00111	0.99889	98.64
10.5	5,184,749.40	841.00	0.00016	0.99984	98.53
11.5	4,981,474.39	271.00	0.00005	0.99995	98.51
12.5	4,859,681.24	8,260.00	0.00170	0.99830	98.51
13.5	4,740,203.24	9,144.00	0.00193	0.99807	98.34
14.5	4,721,383.24	1,281.00	0.00027	0.99973	98.15
15.5	4,351,122.24	724.00	0.00017	0.99983	98.12
16.5	4,242,767.24	0.00	0.00000	1.00000	98.10
17.5	4,208,519.24	684.00	0.00016	0.99984	98.10
18.5	4,142,040.24	7,165.00	0.00173	0.99827	98.08
19.5	4,133,365.24	9,049.00	0.00219	0.99781	97.91
20.5	4,119,120.24	369.00	0.00009	0.99991	97.70
21.5	4,104,291.24	318.00	0.00008	0.99992	97.69
22.5	3,947,748.24	544.00	0.00014	0.99986	97.68
23.5	3,845,679.24	11,644.00	0.00303	0.99697	97.67
24.5	3,720,801.24	7,387.00	0.00199	0.99801	97.37
25.5	3,671,314.33	2,500.00	0.00068	0.99932	97.18
26.5	3,481,599.33	5,102.00	0.00147	0.99853	97.11
27.5	1,834,638.33	359.00	0.00020	0.99980	96.97
28.5	1,735,063.33	1,237.00	0.00071	0.99929	96.95
29.5	1,730,686.33	4,232.00	0.00245	0.99755	96.88
30.5	1,726,668.33	0.00	0.00000	1.00000	96.64
31.5	1,568,043.94	0.00	0.00000	1.00000	96.64
32.5	1,480,504.94	5,298.00	0.00358	0.99642	96.64
33.5	1,464,196.77	852.00	0.00058	0.99942	96.29
34.5	308,999.77	2,213.00	0.00716	0.99284	96.23
35.5	259,904.00	325.00	0.00125	0.99875	95.54
36.5	259,579.00	200.00	0.00077	0.99923	95.42
37.5	248,274.00	0.00	0.00000	1.00000	95.35
38.5	227,424.00	0.00	0.00000	1.00000	95.35
39.5	242,062.00	0.00	0.00000	1.00000	95.35
40.5	210,013.00	0.00	0.00000	1.00000	95.35
41.5	189,894.09	0.00	0.00000	1.00000	95.35
42.5	168,387.09	0.00	0.00000	1.00000	95.35
43.5	168,090.09	44.00	0.00026	0.99974	95.35
44.5	159,600.09	33,904.00	0.21243	0.78757	95.33
45.5	109,107.09	0.00	0.00000	1.00000	75.08
46.5	102,135.09	0.00	0.00000	1.00000	75.08
47.5	102,014.09	0.00	0.00000	1.00000	75.08
48.5	99,097.09	2,428.00	0.02450	0.97550	75.08
49.5	94,870.09	339.00	0.00357	0.99643	73.24
50.5	90,117.09	0.00	0.00000	1.00000	72.98
51.5	89,538.09	15,534.00	0.17349	0.82651	72.98
52.5	73,623.09	241.00	0.00327	0.99673	60.32

Observed Life Table

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Scenario: KEPCO TRANSMISSION 2008

Account: KEPCo 101/6 352 - KY

Placement Band: 1923 - 2008

Observation Band: 1969 - 2008

Age at Beginning of Interval	Exposures at Beginning of Interval	Retirements During Interval	Retirement Ratio	Survivor Ratio	Percent Surv at Beginning of Interval
53.5	72,866.09	1,476.00	0.02026	0.97974	60.12
54.5	32,596.09	5,704.00	0.17499	0.82501	58.90
55.5	26,181.09	356.00	0.01360	0.98640	48.59
56.5	25,733.09	0.00	0.00000	1.00000	47.93
57.5	17,332.09	0.00	0.00000	1.00000	47.93
58.5	17,332.09	352.00	0.02031	0.97969	47.93
59.5	16,980.09	0.00	0.00000	1.00000	46.96
60.5	16,980.09	0.00	0.00000	1.00000	46.96
61.5	16,980.09	0.00	0.00000	1.00000	46.96
62.5	16,828.09	0.00	0.00000	1.00000	46.96
63.5	16,828.09	0.00	0.00000	1.00000	46.96
64.5	14,691.09	0.00	0.00000	1.00000	46.96
65.5	8,951.00	0.00	0.00000	1.00000	46.96
66.5	1,616.00	0.00	0.00000	1.00000	46.96
67.5	1,616.00	0.00	0.00000	1.00000	46.96
68.5	0.00	0.00	0.00000	1.00000	46.96

Surviving Percent Report

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Scenario: KEPCO TRANSMISSION 2008

Account: KEPCo 101/6 352 - KY

Placement Band: 1923 - 2008

Observation Band: 1969- 2008

Age	Actual	L2 73.32
0.0	100.00	100.00
0.5	100.00	100.00
1.5	100.00	100.00
2.5	100.00	100.00
3.5	99.97	99.99
4.5	99.94	99.98
5.5	99.89	99.96
6.5	99.85	99.94
7.5	99.83	99.89
8.5	99.79	99.86
9.5	98.64	99.81
10.5	98.53	99.71
11.5	98.52	99.65
12.5	98.51	99.50
13.5	98.34	99.41
14.5	98.15	99.32
15.5	98.13	99.10
16.5	98.11	98.97
17.5	98.11	98.84
18.5	98.10	98.54
19.5	97.93	98.38
20.5	97.71	98.20
21.5	97.70	97.82
22.5	97.70	97.62
23.5	97.68	97.17
24.5	97.39	96.93
25.5	97.19	96.68
26.5	97.13	96.14
27.5	96.98	95.85
28.5	96.97	95.54
29.5	96.90	94.86
30.5	96.66	94.49
31.5	96.66	94.10
32.5	96.66	93.24
33.5	96.31	92.78
34.5	96.26	91.78
35.5	95.57	91.24
36.5	95.45	90.67
37.5	95.37	89.46
38.5	95.37	88.82
39.5	95.37	88.15
40.5	95.37	86.73
41.5	95.37	85.99
42.5	95.37	85.22
43.5	95.37	83.62
44.5	95.35	82.78
45.5	75.09	81.06
46.5	75.09	80.17
47.5	75.09	79.26
48.5	75.09	77.40
49.5	73.25	76.45
50.5	72.99	75.49
51.5	72.99	73.54
52.5	60.33	72.55
53.5	60.13	71.55

Surviving Percent Report

Scenario: KEPCO TRANSMISSION 2008

Account: KEPCO 101/6 352 - KY

Placement Band: 1923 - 2008

Observation Band: 1969- 2008

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Age	Actual	L2
54.5	58.91	69.53
55.5	48.60	68.52
56.5	47.94	66.48
57.5	47.94	65.46
58.5	47.94	64.44
59.5	46.97	62.40
60.5	46.97	61.39
61.5	46.97	60.38
62.5	46.97	58.37
63.5	46.97	57.37
64.5	46.97	56.38
65.5	46.97	54.42
66.5	46.97	53.45
67.5	46.97	51.53
68.5	46.97	50.59
69.5	46.97	49.66
70.5	46.97	47.82
71.5	46.97	46.92
72.5	46.97	46.03
73.5	46.97	44.28
74.5	46.97	43.42
75.5	46.97	42.57
76.5	46.97	40.91
77.5	46.97	40.09
78.5	46.97	38.50
79.5	46.97	37.72
80.5	46.97	36.95
81.5	46.97	35.45
82.5	46.97	34.71
83.5	46.97	33.99
84.5	46.97	32.57
85.5	46.97	31.88

Actuarial Life Analysis

Account: KEPCo 101/6 352 - KY
Scenario: KEPCO TRANSMISSION 2008
Placement Band: 1923 - 2008
Function: Survivorship Annual Rate Method
Weighting: Unweighted
T-Cut: None

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Observation Band	Censoring		Error Sum of Squares	Best Fit	
	Age	Percent		Disp	ASL
1989 -2008	85.5	94.05	0.00635642	R1.5	251.32

Observed Life Table

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Scenario: KEPCO TRANSMISSION 2008

Account: KEPCo 101/6 352 - KY

Placement Band: 1923 - 2008

Observation Band: 1989 - 2008

Age at Beginning of Interval	Exposures at Beginning of Interval	Retirements During Interval	Retirement Ratio	Survivor Ratio	Percent Surv at Beginning of Interval
0	2,333,502.73	0.00	0.00000	1.00000	100.00
0.5	2,197,565.41	0.00	0.00000	1.00000	100.00
1.5	2,206,020.16	0.00	0.00000	1.00000	100.00
2.5	2,362,397.16	410.00	0.00017	0.99983	100.00
3.5	2,397,622.21	119.00	0.00005	0.99995	99.98
4.5	2,513,082.21	3,388.00	0.00135	0.99865	99.98
5.5	2,568,898.21	270.00	0.00011	0.99989	99.85
6.5	1,957,550.86	0.00	0.00000	1.00000	99.84
7.5	3,599,698.69	636.00	0.00018	0.99982	99.84
8.5	3,617,687.31	61,166.00	0.01691	0.98309	99.82
9.5	3,544,927.16	649.00	0.00018	0.99982	98.13
10.5	3,485,743.16	0.00	0.00000	1.00000	98.11
11.5	3,441,977.54	271.00	0.00008	0.99992	98.11
12.5	3,406,980.39	943.00	0.00028	0.99972	98.10
13.5	3,304,785.56	7,381.00	0.00223	0.99777	98.07
14.5	4,405,019.56	418.00	0.00009	0.99991	97.85
15.5	4,093,432.33	89.00	0.00002	0.99998	97.84
16.5	3,979,800.33	0.00	0.00000	1.00000	97.84
17.5	3,945,938.33	406.00	0.00010	0.99990	97.84
18.5	3,931,311.33	0.00	0.00000	1.00000	97.83
19.5	3,931,053.33	7,625.00	0.00194	0.99806	97.83
20.5	3,950,281.33	79.00	0.00002	0.99998	97.64
21.5	3,958,222.24	0.00	0.00000	1.00000	97.64
22.5	3,836,797.24	0.00	0.00000	1.00000	97.64
23.5	3,738,355.24	3,162.00	0.00085	0.99915	97.64
24.5	3,628,060.24	7,217.00	0.00199	0.99801	97.56
25.5	3,585,106.24	0.00	0.00000	1.00000	97.37
26.5	3,397,528.24	1,293.00	0.00038	0.99962	97.37
27.5	1,754,241.24	103.00	0.00006	0.99994	97.33
28.5	1,654,238.24	522.00	0.00032	0.99968	97.32
29.5	1,652,375.24	3,791.00	0.00229	0.99771	97.29
30.5	1,652,873.24	0.00	0.00000	1.00000	97.07
31.5	1,494,827.85	0.00	0.00000	1.00000	97.07
32.5	1,407,669.85	3,313.00	0.00235	0.99765	97.07
33.5	1,393,862.68	852.00	0.00061	0.99939	96.84
34.5	277,459.68	2,213.00	0.00798	0.99202	96.78
35.5	229,074.91	0.00	0.00000	1.00000	96.01
36.5	229,166.91	0.00	0.00000	1.00000	96.01
37.5	226,468.91	0.00	0.00000	1.00000	96.01
38.5	175,848.91	0.00	0.00000	1.00000	96.01
39.5	174,596.91	0.00	0.00000	1.00000	96.01
40.5	142,547.91	0.00	0.00000	1.00000	96.01
41.5	120,959.00	0.00	0.00000	1.00000	96.01
42.5	91,187.00	0.00	0.00000	1.00000	96.01
43.5	90,890.00	0.00	0.00000	1.00000	96.01
44.5	84,581.00	0.00	0.00000	1.00000	96.01
45.5	74,084.09	0.00	0.00000	1.00000	96.01
46.5	74,447.09	0.00	0.00000	1.00000	96.01
47.5	74,326.09	0.00	0.00000	1.00000	96.01
48.5	73,025.09	0.00	0.00000	1.00000	96.01
49.5	71,226.09	0.00	0.00000	1.00000	96.01
50.5	66,812.09	0.00	0.00000	1.00000	96.01
51.5	66,233.09	0.00	0.00000	1.00000	96.01
52.5	65,852.09	0.00	0.00000	1.00000	96.01

Observed Life Table

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Scenario: KEPCO TRANSMISSION 2008

Account: KEPCo 101/6 352 - KY

Placement Band: 1923 - 2008

Observation Band: 1989 - 2008

Age at Beginning of Interval	Exposures at Beginning of Interval	Retirements During Interval	Retirement Ratio	Survivor Ratio	Percent Surv at Beginning of Interval
53.5	65,336.09	6.00	0.00009	0.99991	96.01
54.5	26,536.09	0.00	0.00000	1.00000	96.00
55.5	25,825.09	0.00	0.00000	1.00000	96.00
56.5	25,733.09	0.00	0.00000	1.00000	96.00
57.5	17,332.09	0.00	0.00000	1.00000	96.00
58.5	17,332.09	352.00	0.02031	0.97969	96.00
59.5	16,980.09	0.00	0.00000	1.00000	94.05
60.5	16,980.09	0.00	0.00000	1.00000	94.05
61.5	16,980.09	0.00	0.00000	1.00000	94.05
62.5	16,828.09	0.00	0.00000	1.00000	94.05
63.5	16,828.09	0.00	0.00000	1.00000	94.05
64.5	14,691.09	0.00	0.00000	1.00000	94.05
65.5	8,951.00	0.00	0.00000	1.00000	94.05
66.5	1,616.00	0.00	0.00000	1.00000	94.05
67.5	1,616.00	0.00	0.00000	1.00000	94.05
68.5	0.00	0.00	0.00000	1.00000	94.05

Surviving Percent Report

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Scenario: KEPCO TRANSMISSION 2008

Account: KEPCo 101/6 352 - KY

Placement Band: 1923 - 2008

Observation Band: 1989- 2008

Age	Actual	R1.5 251.32	L2 73.00
0.0	100.00	100.00	100.00
0.5	100.00	100.00	100.00
1.5	100.00	100.00	100.00
2.5	100.00	100.00	100.00
3.5	99.98	99.82	99.99
4.5	99.98	99.82	99.98
5.5	99.84	99.64	99.96
6.5	99.83	99.64	99.94
7.5	99.83	99.64	99.89
8.5	99.81	99.46	99.86
9.5	98.13	99.46	99.77
10.5	98.11	99.27	99.71
11.5	98.11	99.27	99.65
12.5	98.10	99.27	99.50
13.5	98.07	99.08	99.41
14.5	97.86	99.08	99.32
15.5	97.85	98.89	99.10
16.5	97.84	98.89	98.97
17.5	97.84	98.89	98.84
18.5	97.83	98.69	98.54
19.5	97.83	98.69	98.38
20.5	97.64	98.49	98.02
21.5	97.64	98.49	97.82
22.5	97.64	98.49	97.62
23.5	97.64	98.28	97.17
24.5	97.56	98.28	96.93
25.5	97.37	98.08	96.68
26.5	97.37	98.08	96.14
27.5	97.33	98.08	95.85
28.5	97.32	97.86	95.21
29.5	97.29	97.86	94.86
30.5	97.07	97.64	94.49
31.5	97.07	97.64	93.68
32.5	97.07	97.64	93.24
33.5	96.84	97.42	92.78
34.5	96.78	97.42	91.78
35.5	96.01	97.20	91.24
36.5	96.01	97.20	90.08
37.5	96.01	97.20	89.46
38.5	96.01	96.97	88.82
39.5	96.01	96.97	87.45
40.5	96.01	96.74	86.73
41.5	96.01	96.74	85.99
42.5	96.01	96.74	84.43
43.5	96.01	96.50	83.62
44.5	96.01	96.50	82.78
45.5	96.01	96.26	81.06
46.5	96.01	96.26	80.17
47.5	96.01	96.26	78.34
48.5	96.01	96.01	77.40
49.5	96.01	96.01	76.45
50.5	96.01	95.76	74.52
51.5	96.01	95.76	73.54
52.5	96.01	95.76	72.55
53.5	96.01	95.51	70.54

Surviving Percent Report

Scenario: KEPCO TRANSMISSION 2008

Account: KEPCo 101/6 352 - KY

Placement Band: 1923 - 2008

Observation Band: 1989- 2008

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Age	Actual	R1.5 251.32	L2 73.00
54.5	96.00	95.51	69.53
55.5	96.00	95.25	67.50
56.5	96.00	95.25	66.48
57.5	96.00	95.25	65.46
58.5	96.00	94.99	63.42
59.5	94.05	94.99	62.40
60.5	94.05	94.72	61.39
61.5	94.05	94.72	59.37
62.5	94.05	94.72	58.37
63.5	94.05	94.44	57.37
64.5	94.05	94.44	55.39
65.5	94.05	94.17	54.42
66.5	94.05	94.17	52.49
67.5	94.05	94.17	51.53
68.5	94.05	93.89	50.59
69.5	94.05	93.89	48.74
70.5	94.05	93.60	47.82
71.5	94.05	93.60	46.92
72.5	94.05	93.60	45.15
73.5	94.05	93.31	44.28
74.5	94.05	93.31	42.57
75.5	94.05	93.01	41.73
76.5	94.05	93.01	40.91
77.5	94.05	93.01	39.29
78.5	94.05	92.71	38.50
79.5	94.05	92.71	37.72
80.5	94.05	92.40	36.19
81.5	94.05	92.40	35.45
82.5	94.05	92.40	33.99
83.5	94.05	92.09	33.27
84.5	94.05	92.09	32.57
85.5	94.05	91.78	31.20

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Actuarial Life Analysis

Account: KEPCo 101/6 352 - KY
Scenario: KEPCO TRANSMISSION 2008
Placement Band: 1923 - 2008
Function: Survivorship Annual Rate Method
Weighting: Unweighted
T-Cut: None

Observation Band	Censoring		Error Sum of Squares	Best Fit	
	Age	Percent		Disp	ASL
1999 -2008	85.5	91.63	0.03130360	R0.5	280.35

Observed Life Table

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Scenario: KEPCO TRANSMISSION 2008

Account: KEPCo 101/6 352 - KY

Placement Band: 1923 - 2008

Observation Band: 1999 - 2008

Age at Beginning of Interval	Exposures at Beginning of Interval	Retirements During Interval	Retirement Ratio	Survivor Ratio	Percent Surv at Beginning of Interval
0	1,125,852.57	0.00	0.00000	1.00000	100.00
0.5	1,043,379.25	0.00	0.00000	1.00000	100.00
1.5	1,239,877.01	0.00	0.00000	1.00000	100.00
2.5	1,419,991.16	0.00	0.00000	1.00000	100.00
3.5	1,469,351.21	0.00	0.00000	1.00000	100.00
4.5	1,518,538.21	1,180.00	0.00078	0.99922	100.00
5.5	1,888,743.21	270.00	0.00014	0.99986	99.92
6.5	1,196,345.86	0.00	0.00000	1.00000	99.91
7.5	1,240,714.69	0.00	0.00000	1.00000	99.91
8.5	1,222,228.31	60,792.00	0.04974	0.95026	99.91
9.5	1,146,766.16	0.00	0.00000	1.00000	94.94
10.5	1,093,302.16	0.00	0.00000	1.00000	94.94
11.5	904,170.15	0.00	0.00000	1.00000	94.94
12.5	938,203.00	0.00	0.00000	1.00000	94.94
13.5	924,478.00	0.00	0.00000	1.00000	94.94
14.5	990,870.00	0.00	0.00000	1.00000	94.94
15.5	672,081.00	0.00	0.00000	1.00000	94.94
16.5	752,713.00	0.00	0.00000	1.00000	94.94
17.5	2,349,758.00	0.00	0.00000	1.00000	94.94
18.5	2,386,780.00	0.00	0.00000	1.00000	94.94
19.5	2,388,410.00	0.00	0.00000	1.00000	94.94
20.5	2,383,339.00	0.00	0.00000	1.00000	94.94
21.5	2,528,705.39	0.00	0.00000	1.00000	94.94
22.5	2,459,867.39	0.00	0.00000	1.00000	94.94
23.5	2,372,340.56	0.00	0.00000	1.00000	94.94
24.5	3,411,106.56	0.00	0.00000	1.00000	94.94
25.5	3,407,876.33	0.00	0.00000	1.00000	94.94
26.5	3,213,326.33	0.00	0.00000	1.00000	94.94
27.5	1,582,419.33	103.00	0.00007	0.99993	94.94
28.5	1,530,119.33	0.00	0.00000	1.00000	94.93
29.5	1,528,231.33	1,202.00	0.00079	0.99921	94.93
30.5	1,558,953.33	0.00	0.00000	1.00000	94.86
31.5	1,422,769.85	0.00	0.00000	1.00000	94.86
32.5	1,365,154.85	3,313.00	0.00243	0.99757	94.86
33.5	1,351,128.68	852.00	0.00063	0.99937	94.63
34.5	204,377.68	2,213.00	0.01083	0.98917	94.57
35.5	171,870.91	0.00	0.00000	1.00000	93.55
36.5	178,842.91	0.00	0.00000	1.00000	93.55
37.5	167,858.91	0.00	0.00000	1.00000	93.55
38.5	120,155.91	0.00	0.00000	1.00000	93.55
39.5	120,702.91	0.00	0.00000	1.00000	93.55
40.5	93,067.91	0.00	0.00000	1.00000	93.55
41.5	72,058.00	0.00	0.00000	1.00000	93.55
42.5	42,515.00	0.00	0.00000	1.00000	93.55
43.5	42,734.00	0.00	0.00000	1.00000	93.55
44.5	73,082.00	0.00	0.00000	1.00000	93.55
45.5	57,204.00	0.00	0.00000	1.00000	93.55
46.5	50,324.00	0.00	0.00000	1.00000	93.55
47.5	58,610.00	0.00	0.00000	1.00000	93.55
48.5	55,693.00	0.00	0.00000	1.00000	93.55
49.5	53,894.00	0.00	0.00000	1.00000	93.55
50.5	49,480.00	0.00	0.00000	1.00000	93.55
51.5	48,901.00	0.00	0.00000	1.00000	93.55
52.5	48,672.00	0.00	0.00000	1.00000	93.55

Observed Life Table

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Scenario: KEPCO TRANSMISSION 2008

Account: KEPCo 101/6 352 - KY

Placement Band: 1923 - 2008

Observation Band: 1999 - 2008

Age at Beginning of Interval	Exposures at Beginning of Interval	Retirements During Interval	Retirement Ratio	Survivor Ratio	Percent Surv at Beginning of Interval
53.5	48,156.00	6.00	0.00012	0.99988	93.55
54.5	11,493.00	0.00	0.00000	1.00000	93.54
55.5	16,874.09	0.00	0.00000	1.00000	93.54
56.5	24,117.09	0.00	0.00000	1.00000	93.54
57.5	15,716.09	0.00	0.00000	1.00000	93.54
58.5	17,332.09	352.00	0.02031	0.97969	93.54
59.5	16,980.09	0.00	0.00000	1.00000	91.64
60.5	16,980.09	0.00	0.00000	1.00000	91.64
61.5	16,980.09	0.00	0.00000	1.00000	91.64
62.5	16,828.09	0.00	0.00000	1.00000	91.64
63.5	16,828.09	0.00	0.00000	1.00000	91.64
64.5	14,691.09	0.00	0.00000	1.00000	91.64
65.5	8,951.00	0.00	0.00000	1.00000	91.64
66.5	1,616.00	0.00	0.00000	1.00000	91.64
67.5	1,616.00	0.00	0.00000	1.00000	91.64
68.5	0.00	0.00	0.00000	1.00000	91.64

Surviving Percent Report

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Scenario: KEPCO TRANSMISSION 2008

Account: KEPCo 101/6 352 - KY

Placement Band: 1923 - 2008

Observation Band: 1999- 2008

Age	Actual	R0.5 280.35	L3 73.00
0.0	100.00	100.00	100.00
0.5	100.00	100.00	100.00
1.5	100.00	100.00	100.00
2.5	100.00	100.00	100.00
3.5	100.00	99.62	100.00
4.5	100.00	99.62	100.00
5.5	99.92	99.62	100.00
6.5	99.91	99.24	100.00
7.5	99.91	99.24	100.00
8.5	99.91	98.86	100.00
9.5	94.94	98.86	100.00
10.5	94.94	98.86	99.99
11.5	94.94	98.47	99.99
12.5	94.94	98.47	99.97
13.5	94.94	98.47	99.96
14.5	94.94	98.09	99.94
15.5	94.94	98.09	99.90
16.5	94.94	98.09	99.87
17.5	94.94	97.70	99.84
18.5	94.94	97.70	99.76
19.5	94.94	97.70	99.71
20.5	94.94	97.31	99.59
21.5	94.94	97.31	99.52
22.5	94.94	96.92	99.45
23.5	94.94	96.92	99.28
24.5	94.94	96.92	99.18
25.5	94.94	96.52	99.07
26.5	94.94	96.52	98.83
27.5	94.94	96.52	98.70
28.5	94.93	96.13	98.40
29.5	94.93	96.13	98.23
30.5	94.86	96.13	98.06
31.5	94.86	95.73	97.67
32.5	94.86	95.73	97.45
33.5	94.63	95.73	97.22
34.5	94.57	95.33	96.72
35.5	93.54	95.33	96.44
36.5	93.54	94.93	95.83
37.5	93.54	94.93	95.49
38.5	93.54	94.93	95.13
39.5	93.54	94.53	94.33
40.5	93.54	94.53	93.89
41.5	93.54	94.53	93.42
42.5	93.54	94.12	92.39
43.5	93.54	94.12	91.82
44.5	93.54	94.12	91.21
45.5	93.54	93.72	89.89
46.5	93.54	93.72	89.17
47.5	93.54	93.72	87.60
48.5	93.54	93.31	86.76
49.5	93.54	93.31	85.87
50.5	93.54	92.90	83.98
51.5	93.54	92.90	82.97
52.5	93.54	92.90	81.92
53.5	93.54	92.49	79.70

Surviving Percent Report

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Scenario: KEPCO TRANSMISSION 2008

Account: KEPCo 101/6 352 - KY

Placement Band: 1923 - 2008

Observation Band: 1999 - 2008

Age	Actual	R0.5 280.35	L3 73.00
54.5	93.53	92.49	78.54
55.5	93.53	92.49	76.12
56.5	93.53	92.08	74.86
57.5	93.53	92.08	73.57
58.5	93.53	92.08	70.93
59.5	91.63	91.66	69.58
60.5	91.63	91.66	68.21
61.5	91.63	91.66	65.43
62.5	91.63	91.24	64.03
63.5	91.63	91.24	62.62
64.5	91.63	90.82	59.81
65.5	91.63	90.82	58.40
66.5	91.63	90.82	55.61
67.5	91.63	90.40	54.23
68.5	91.63	90.40	52.87
69.5	91.63	90.40	50.18
70.5	91.63	89.98	48.86
71.5	91.63	89.98	47.57
72.5	91.63	89.98	45.04
73.5	91.63	89.56	43.81
74.5	91.63	89.56	41.43
75.5	91.63	89.56	40.28
76.5	91.63	89.13	39.16
77.5	91.63	89.13	36.99
78.5	91.63	88.71	35.94
79.5	91.63	88.71	34.92
80.5	91.63	88.71	32.96
81.5	91.63	88.28	32.02
82.5	91.63	88.28	30.21
83.5	91.63	88.28	29.35
84.5	91.63	87.85	28.50
85.5	91.63	87.85	26.88

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KENTUCKY POWER COMPANY
 Depreciation Study as of December 31, 2008
 Transmission Plant

Account	<u>353 STATION EQUIPMENT</u>	
Depreciable Balance	\$146,458,490	
	<u>Current</u>	<u>Recommended</u>
Average Service Life (Yrs)	50	42
Iowa Curve	R0.5	R2.0
Gross Removal, %		20%
Gross Salvage, %		15%
Net Salvage %	25%	-5%

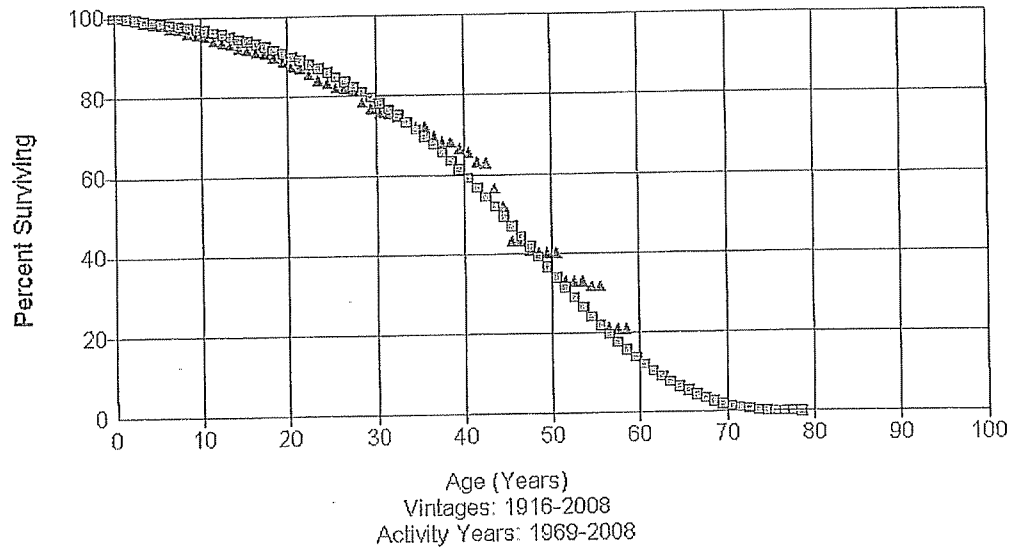
 The actuarial analysis indicate that the current 50 year average service life for this account should be shortened. Based on the analysis of the 40 year band, recommendation is to move to a 42 year average service life following an R2.0 type dispersion.

The removal of station equipment will require labor and equipment costs and some salvage would be expected from the scrap values and reuse of the material.

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Account: KEPCo 101/6 353 - KY
Scenario: KEPCO TRANSMISSION 2008

△ Actual Data □ R2 42.22



Actuarial Life Analysis

Account: KEPCo 101/6 353 - KY
Scenario: KEPCO TRANSMISSION 2008
Placement Band: 1916 - 2008
Function: Survivorship Annual Rate Method
Weighting: Unweighted
T-Cut: None

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Observation Band	Censoring		Error Sum of Squares	Best Fit	
	Age	Percent		Disp	ASL
1969 -2008	92.5	0.00	0.14609933	R2	42.22

Observed Life Table

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Scenario: KEPCO TRANSMISSION 2008

Account: KEPCo 101/6 353 - KY

Placement Band: 1916 - 2008

Observation Band: 1969 - 2008

Age at Beginning of Interval	Exposures at Beginning of Interval	Retirements During Interval	Retirement Ratio	Survivor Ratio	Percent Surv at Beginning of Interval
0	158,770,054.58	88,301.00	0.00056	0.99944	100.00
0.5	146,237,516.57	161,021.00	0.00110	0.99890	99.94
1.5	144,768,267.99	313,688.00	0.00217	0.99783	99.83
2.5	134,563,930.14	1,085,702.00	0.00807	0.99193	99.61
3.5	131,727,554.56	655,240.00	0.00497	0.99503	98.81
4.5	128,279,079.69	516,028.00	0.00402	0.99598	98.32
5.5	124,894,734.49	753,720.00	0.00603	0.99397	97.92
6.5	120,507,580.51	575,370.00	0.00477	0.99523	97.33
7.5	116,974,854.15	944,062.00	0.00807	0.99193	96.87
8.5	113,596,404.96	636,873.00	0.00561	0.99439	96.09
9.5	111,658,793.55	302,826.00	0.00271	0.99729	95.55
10.5	100,386,632.37	1,229,866.00	0.01225	0.98775	95.29
11.5	62,477,651.11	362,851.00	0.00581	0.99419	94.12
12.5	59,747,607.67	273,968.00	0.00459	0.99541	93.57
13.5	58,654,324.63	683,381.00	0.01165	0.98835	93.14
14.5	56,082,909.51	196,811.00	0.00351	0.99649	92.05
15.5	50,277,130.40	275,537.00	0.00548	0.99452	91.73
16.5	48,182,592.24	261,269.00	0.00542	0.99458	91.23
17.5	44,178,678.91	409,131.00	0.00926	0.99074	90.74
18.5	40,802,355.30	457,121.00	0.01120	0.98880	89.90
19.5	39,267,091.78	716,735.00	0.01825	0.98175	88.89
20.5	38,028,239.21	89,639.00	0.00236	0.99764	87.27
21.5	35,921,425.59	653,577.00	0.01819	0.98181	87.05
22.5	34,773,226.59	618,190.00	0.01778	0.98222	85.48
23.5	33,439,336.67	237,217.00	0.00709	0.99291	83.96
24.5	31,995,181.67	469,737.00	0.01468	0.98532	83.36
25.5	30,321,935.27	153,185.00	0.00505	0.99495	82.14
26.5	28,576,586.24	43,402.00	0.00152	0.99848	81.73
27.5	21,350,804.22	831,854.00	0.03896	0.96104	81.61
28.5	15,242,898.36	333,833.00	0.02190	0.97810	78.43
29.5	13,973,393.06	171,898.00	0.01230	0.98770	76.71
30.5	13,897,099.27	97,331.00	0.00700	0.99300	75.77
31.5	11,809,345.14	73,709.00	0.00624	0.99376	75.24
32.5	10,688,901.70	182,578.00	0.01708	0.98292	74.77
33.5	9,742,596.70	188,855.00	0.01938	0.98062	73.49
34.5	8,524,898.95	14,310.00	0.00168	0.99832	72.07
35.5	8,349,277.24	259,105.00	0.03103	0.96897	71.95
36.5	7,921,386.16	164,669.00	0.02081	0.97919	69.72
37.5	7,555,200.74	13,605.00	0.00180	0.99820	68.27
38.5	6,851,704.99	152,639.00	0.02228	0.97772	68.15
39.5	1,961,198.63	30,716.00	0.01566	0.98434	66.63
40.5	1,871,058.63	72,083.00	0.03853	0.96147	65.59
41.5	1,560,051.16	5,110.00	0.00328	0.99672	63.06
42.5	1,549,478.16	158,998.00	0.10261	0.89739	62.85
43.5	1,294,284.54	102,193.00	0.07896	0.92104	56.40
44.5	1,189,747.28	199,980.00	0.16809	0.83191	51.95
45.5	428,806.28	2,021.00	0.00471	0.99529	43.22
46.5	441,292.28	23,804.00	0.05394	0.94606	43.02
47.5	417,141.28	6,012.00	0.01441	0.98559	40.70
48.5	385,745.31	177.00	0.00046	0.99954	40.11
49.5	333,200.76	0.00	0.00000	1.00000	40.09
50.5	332,623.76	59,244.00	0.17811	0.82189	40.09
51.5	264,399.25	403.00	0.00152	0.99848	32.95
52.5	264,130.25	327.00	0.00124	0.99876	32.90

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Observed Life Table

Scenario: KEPCO TRANSMISSION 2008

Account: KEPCo 101/6 353 - KY

Placement Band: 1916 - 2008

Observation Band: 1969 - 2008

Age at Beginning of Interval	Exposures at Beginning of Interval	Retirements During Interval	Retirement Ratio	Survivor Ratio	Percent Surv at Beginning of Interval
53.5	262,906.25	8,887.00	0.03380	0.96620	32.86
54.5	28,122.00	0.00	0.00000	1.00000	31.75
55.5	20,547.00	6,860.00	0.33387	0.66613	31.75
56.5	13,687.00	134.00	0.00979	0.99021	21.15
57.5	13,553.00	0.00	0.00000	1.00000	20.94
58.5	13,553.00	13,553.00	1.00000	0.00000	20.94
59.5	0.00	0.00	0.00000	1.00000	0.00

Surviving Percent Report

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Scenario: KEPCO TRANSMISSION 2008

Account: KEPCo 101/6 353 - KY

Placement Band: 1916 - 2008

Observation Band: 1969- 2008

Age	Actual	R2 42.22
0.0	100.00	100.00
0.5	99.94	99.91
1.5	99.83	99.71
2.5	99.62	99.49
3.5	98.81	99.15
4.5	98.32	98.89
5.5	97.93	98.49
6.5	97.34	98.19
7.5	96.87	97.88
8.5	96.09	97.37
9.5	95.55	97.01
10.5	95.29	96.63
11.5	94.12	96.01
12.5	93.58	95.56
13.5	93.15	95.09
14.5	92.06	94.34
15.5	91.74	93.80
16.5	91.24	92.93
17.5	90.74	92.32
18.5	89.90	91.67
19.5	88.90	90.64
20.5	87.27	89.90
21.5	87.07	89.13
22.5	85.48	87.89
23.5	83.96	87.02
24.5	83.37	85.63
25.5	82.14	84.65
26.5	81.73	83.62
27.5	81.60	81.98
28.5	78.42	80.83
29.5	76.71	79.63
30.5	75.76	77.73
31.5	75.23	76.39
32.5	74.76	75.00
33.5	73.49	72.82
34.5	72.06	71.28
35.5	71.94	68.88
36.5	69.71	67.21
37.5	68.26	65.48
38.5	68.13	62.79
39.5	66.62	60.93
40.5	65.57	59.01
41.5	63.05	56.05
42.5	62.84	54.02
43.5	56.39	50.91
44.5	51.94	48.79
45.5	43.21	46.65
46.5	43.01	43.40
47.5	40.69	41.21
48.5	40.10	39.02
49.5	40.08	35.75
50.5	40.08	33.59
51.5	32.94	31.44
52.5	32.89	28.30
53.5	32.85	26.25

Surviving Percent Report

Scenario: KEPCO TRANSMISSION 2008

Account: KEPCo 101/6 353 - KY

Placement Band: 1916 - 2008

Observation Band: 1969- 2008

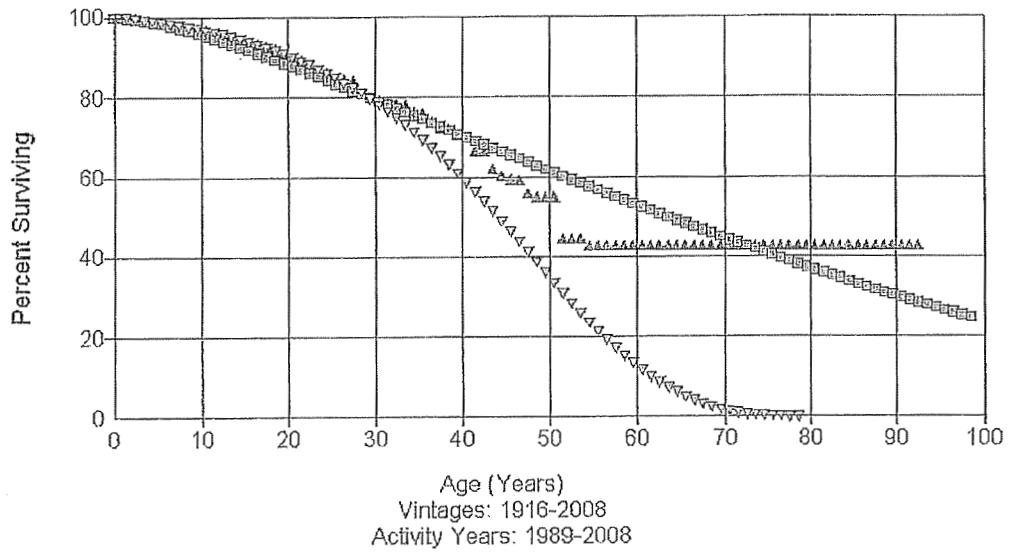
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Age	Actual	R242.22
54.5	31.74	23.28
55.5	31.74	21.38
56.5	21.14	19.54
57.5	20.94	16.93
58.5	20.94	15.30
59.5	0	13.74
60.5	0	11.58
61.5	0	10.25
62.5	0	8.43
63.5	0	7.33
64.5	0	6.32
65.5	0	4.96
66.5	0	4.16
67.5	0	3.44
68.5	0	2.51
69.5	0	1.99
70.5	0	1.53
71.5	0	0.98
72.5	0	0.69
73.5	0	0.36
74.5	0	0.21
75.5	0	0.11
76.5	0	0.03
77.5	0	0.01
78.5	0	0
79.5	0	0
80.5	0	
81.5	0	
82.5	0	
83.5	0	
84.5	0	
85.5	0	
86.5	0	
87.5	0	
88.5	0	
89.5	0	
90.5	0	
91.5	0	
92.5	0	

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Account: KEPCo 101/6 353 - KY
Scenario: KEPCO TRANSMISSION 2008

△ Actual Data □ L0 69.07 ▽ R2 42.00



Actuarial Life Analysis

Account: KEPCo 101/6 353 - KY
Scenario: KEPCO TRANSMISSION 2008
Placement Band: 1916 - 2008
Function: Survivorship Annual Rate Method
Weighting: Unweighted
T-Cut: None

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Observation Band	Censoring		Error Sum of Squares	Best Fit	
	Age	Percent		Disp	ASL
1989 -2008	92.5	42.70	0.39718772	LD	69.07

Observed Life Table

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Scenario: KEPCO TRANSMISSION 2008

Account: KEPCo 101/6 353 - KY

Placement Band: 1916 - 2008

Observation Band: 1989 - 2008

Age at Beginning of Interval	Exposures at Beginning of Interval	Retirements During Interval	Refirment Ratio	Survivor Ratio	Percent Surv at Beginning of Interval
0	115,554,490.43	6,132.00	0.00005	0.99995	100.00
0.5	103,556,584.99	41,737.00	0.00040	0.99960	100.00
1.5	104,287,231.56	207,662.00	0.00199	0.99801	99.96
2.5	94,469,559.71	429,862.00	0.00455	0.99545	99.76
3.5	92,738,977.43	493,160.00	0.00532	0.99468	99.31
4.5	90,644,141.30	153,844.00	0.00170	0.99830	98.78
5.5	88,533,672.50	694,506.00	0.00784	0.99216	98.61
6.5	85,991,728.55	131,698.00	0.00153	0.99847	97.84
7.5	91,995,174.21	325,680.00	0.00354	0.99646	97.69
8.5	95,261,679.91	300,469.00	0.00315	0.99685	97.34
9.5	94,523,591.25	153,218.00	0.00162	0.99838	97.03
10.5	83,689,694.86	962,618.00	0.01150	0.98850	96.87
11.5	48,209,037.22	150,774.00	0.00313	0.99687	95.76
12.5	46,727,918.22	155,095.00	0.00332	0.99668	95.46
13.5	46,493,103.18	576,403.00	0.01240	0.98760	95.14
14.5	44,862,485.56	77,616.00	0.00173	0.99827	93.96
15.5	39,510,742.16	149,478.00	0.00378	0.99622	93.80
16.5	37,443,890.08	250,921.00	0.00670	0.99330	93.45
17.5	33,670,268.17	332,352.00	0.00987	0.99013	92.82
18.5	31,090,390.31	266,591.00	0.00857	0.99143	91.90
19.5	36,713,988.15	649,282.00	0.01768	0.98232	91.11
20.5	35,629,931.58	65,030.00	0.00183	0.99817	89.50
21.5	33,869,878.43	639,232.00	0.01887	0.98113	89.34
22.5	32,780,230.43	507,975.00	0.01550	0.98450	87.65
23.5	31,684,108.13	97,460.00	0.00308	0.99692	86.29
24.5	30,450,428.39	465,455.00	0.01529	0.98471	86.02
25.5	29,188,835.99	152,166.00	0.00521	0.99479	84.70
26.5	27,453,651.96	28,241.00	0.00103	0.99897	84.26
27.5	20,198,547.94	800,841.00	0.03965	0.96035	84.17
28.5	14,154,315.05	168,119.00	0.01188	0.98812	80.83
29.5	13,145,034.30	123,396.00	0.00939	0.99061	79.87
30.5	12,968,856.51	88,497.00	0.00682	0.99318	79.12
31.5	10,900,981.89	40,033.00	0.00367	0.99633	78.58
32.5	9,769,519.45	63,477.00	0.00650	0.99350	78.29
33.5	8,943,341.45	188,744.00	0.02110	0.97890	77.78
34.5	8,131,209.95	14,310.00	0.00176	0.99824	76.14
35.5	7,963,163.24	233,376.00	0.02931	0.97069	76.01
36.5	7,561,001.16	163,760.00	0.02166	0.97834	73.78
37.5	7,195,924.74	11,618.00	0.00161	0.99839	72.18
38.5	6,494,729.99	152,065.00	0.02341	0.97659	72.06
39.5	1,604,797.63	11,504.00	0.00717	0.99283	70.37
40.5	1,533,869.63	72,076.00	0.04699	0.95301	69.87
41.5	1,222,869.16	5,110.00	0.00418	0.99582	66.59
42.5	1,211,916.16	80,090.00	0.06609	0.93391	66.31
43.5	1,035,630.54	30,513.00	0.02946	0.97054	61.93
44.5	1,002,773.28	13,293.00	0.01326	0.98674	60.11
45.5	428,519.28	1,734.00	0.00405	0.99595	59.31
46.5	420,879.28	23,804.00	0.05656	0.94344	59.07
47.5	396,728.28	6,012.00	0.01515	0.98485	55.73
48.5	365,332.31	177.00	0.00048	0.99952	54.89
49.5	312,787.76	0.00	0.00000	1.00000	54.86
50.5	312,210.76	59,244.00	0.18976	0.81024	54.86
51.5	243,986.25	403.00	0.00165	0.99835	44.45
52.5	243,583.25	327.00	0.00134	0.99866	44.38

Observed Life Table

Scenario: KEPCO TRANSMISSION 2008

Account: KEPCo 101/6 353 - KY

Placement Band: 1916 - 2008

Observation Band: 1989 - 2008

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Age at Beginning of Interval	Exposures at Beginning of Interval	Retirements During Interval	Retirement Ratio	Survivor Ratio	Percent Surv at Beginning of Interval
53.5	242,359.25	8,887.00	0.03667	0.96333	44.32
54.5	7,575.00	0.00	0.00000	1.00000	42.69
55.5	0.00	0.00	0.00000	1.00000	42.69

Surviving Percent Report

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Scenario: KEPCO TRANSMISSION 2008

Account: KEPCo 101/6 353 - KY

Placement Band: 1916 - 2008

Observation Band: 1989- 2008

Age	Actual	L0 69.07	R2 42.00
0.0	100.00	100.00	100.00
0.5	99.99	100.00	99.91
1.5	99.95	99.68	99.71
2.5	99.76	99.45	99.49
3.5	99.30	98.89	99.15
4.5	98.77	98.58	98.89
5.5	98.61	98.24	98.49
6.5	97.83	97.50	98.19
7.5	97.68	97.11	97.88
8.5	97.34	96.27	97.37
9.5	97.03	95.83	97.01
10.5	96.87	94.92	96.43
11.5	95.76	94.45	96.01
12.5	95.46	93.47	95.56
13.5	95.14	92.97	94.85
14.5	93.96	92.46	94.34
15.5	93.80	91.41	93.80
16.5	93.44	90.88	92.93
17.5	92.82	89.78	92.32
18.5	91.90	89.23	91.34
19.5	91.11	88.10	90.64
20.5	89.50	87.53	89.90
21.5	89.34	86.37	88.73
22.5	87.65	85.78	87.89
23.5	86.30	84.59	87.02
24.5	86.03	83.99	85.63
25.5	84.71	83.39	84.65
26.5	84.27	82.18	83.09
27.5	84.19	81.57	81.98
28.5	80.85	80.34	80.83
29.5	79.89	79.72	79.01
30.5	79.14	78.48	77.73
31.5	78.60	77.86	76.39
32.5	78.31	76.62	74.29
33.5	77.80	75.99	72.82
34.5	76.16	75.37	70.50
35.5	76.02	74.12	68.88
36.5	73.80	73.50	67.21
37.5	72.20	72.25	64.60
38.5	72.08	71.62	62.79
39.5	70.39	70.38	59.97
40.5	69.89	69.76	58.04
41.5	66.61	68.51	56.05
42.5	66.33	67.89	53.00
43.5	61.94	67.27	50.91
44.5	60.12	66.04	48.79
45.5	59.32	65.42	45.57
46.5	59.08	64.19	43.40
47.5	55.74	63.57	40.12
48.5	54.90	62.35	37.93
49.5	54.87	61.74	35.75
50.5	54.87	60.52	32.51
51.5	44.46	59.91	30.39
52.5	44.38	58.70	27.27
53.5	44.32	58.10	25.25

Surviving Percent Report

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Scenario: KEPCO TRANSMISSION 2008

Account: KEPCo 101/6 353 - KY

Placement Band: 1916 - 2008

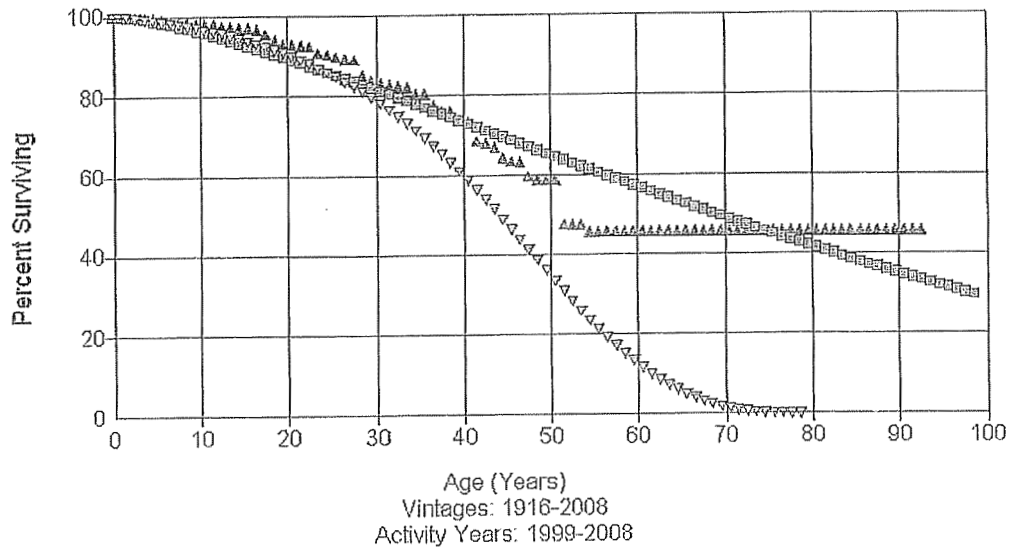
Observation Band: 1989- 2008

Age	Actual	L0 69.07	R2 42.00
54.5	42.70	57.50	23.28
55.5	42.70	56.31	20.45
56.5	42.70	55.71	18.65
57.5	42.70	54.53	16.93
58.5	42.70	53.94	14.51
59.5	42.70	52.77	13.00
60.5	42.70	52.18	10.91
61.5	42.70	51.02	9.62
62.5	42.70	50.45	8.43
63.5	42.70	49.87	6.81
64.5	42.70	48.73	5.84
65.5	42.70	48.17	4.96
66.5	42.70	47.04	3.79
67.5	42.70	46.48	3.12
68.5	42.70	45.37	2.24
69.5	42.70	44.82	1.75
70.5	42.70	43.73	1.33
71.5	42.70	43.18	0.82
72.5	42.70	42.64	0.56
73.5	42.70	41.57	0.28
74.5	42.70	41.04	0.16
75.5	42.70	39.99	0.07
76.5	42.70	39.47	0.01
77.5	42.70	38.44	0
78.5	42.70	37.93	0
79.5	42.70	36.91	0
80.5	42.70	36.41	
81.5	42.70	35.92	
82.5	42.70	34.93	
83.5	42.70	34.44	
84.5	42.70	33.48	
85.5	42.70	33.00	
86.5	42.70	32.06	
87.5	42.70	31.59	
88.5	42.70	30.67	
89.5	42.70	30.21	
90.5	42.70	29.31	
91.5	42.70	28.87	
92.5	42.70	28.43	

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Account: KEPCo 101/6 353 - KY
Scenario: KEPCO TRANSMISSION 2008

△ Actual Data □ LO 75.00 ▽ R2 42.00



Actuarial Life Analysis

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Account: KEPCo 101/6 353 - KY
Scenario: KEPCO TRANSMISSION 2008
Placement Band: 1916 - 2008
Inflation: Survivorship Annual Rate Method
Weighting: Unweighted
T-Cut: None

Observation	Censoring		Error Sum	Best Fit	
Band	Age	Percent	of Squares	Disp	ASL
1999 -2008	92.5	45.55	0.41200720	L0	75.00

Observed Life Table

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Scenario: KEPCO TRANSMISSION 2008

Account: KEPCo 101/6 353 - KY

Placement Band: 1916 - 2008

Observation Band: 1999 - 2008

Age at Beginning of Interval	Exposures at Beginning of Interval	Retirements During Interval	Retirement Ratio	Survivor Ratio	Percent Surv at Beginning of Interval
0	44,599,905.90	3,244.00	0.00007	0.99993	100.00
0.5	43,170,970.07	9,526.00	0.00022	0.99978	99.99
1.5	78,371,483.79	12,591.00	0.00016	0.99984	99.97
2.5	70,703,385.38	307,249.00	0.00435	0.99565	99.95
3.5	69,143,420.22	19,460.00	0.00028	0.99972	99.92
4.5	68,569,086.46	120,453.00	0.00176	0.99824	99.49
5.5	70,669,612.37	480,898.00	0.00680	0.99320	99.31
6.5	68,692,544.55	25,042.00	0.00036	0.99964	98.63
7.5	69,424,688.52	24,865.00	0.00036	0.99964	98.59
8.5	69,936,940.97	198,466.00	0.00284	0.99716	98.55
9.5	69,602,838.53	76,596.00	0.00110	0.99890	98.27
10.5	58,933,874.92	34,320.00	0.00058	0.99942	98.16
11.5	24,482,929.77	112,016.00	0.00458	0.99542	98.10
12.5	22,410,921.33	73,392.00	0.00327	0.99673	97.65
13.5	22,287,451.21	49,097.00	0.00220	0.99780	97.33
14.5	21,166,695.84	7,252.00	0.00034	0.99966	97.12
15.5	17,030,286.13	52,243.00	0.00307	0.99693	97.09
16.5	16,636,893.00	227,186.00	0.01366	0.98634	96.79
17.5	20,531,430.69	325,948.00	0.01588	0.98412	95.47
18.5	23,262,944.94	214,296.00	0.00921	0.99079	93.95
19.5	22,842,095.72	64,297.00	0.00281	0.99719	93.08
20.5	22,351,801.94	44,522.00	0.00199	0.99801	92.82
21.5	22,414,758.45	61,935.00	0.00276	0.99724	92.64
22.5	22,963,782.89	438,930.00	0.01911	0.98089	92.38
23.5	22,546,287.97	65,904.00	0.00292	0.99708	90.61
24.5	22,386,670.72	175,539.00	0.00784	0.99216	90.35
25.5	21,085,004.03	127,912.00	0.00607	0.99393	89.64
26.5	19,537,947.08	20,927.00	0.00107	0.99893	89.10
27.5	12,503,582.48	528,416.00	0.04226	0.95774	89.00
28.5	7,397,338.37	131,193.00	0.01774	0.98226	85.24
29.5	11,837,909.43	80,115.00	0.00677	0.99323	83.73
30.5	11,764,986.64	83,958.00	0.00714	0.99286	83.16
31.5	10,004,284.98	27,160.00	0.00271	0.99729	82.57
32.5	8,891,538.54	35,081.00	0.00395	0.99605	82.35
33.5	8,198,407.16	168,446.00	0.02055	0.97945	82.02
34.5	7,013,328.67	14,245.00	0.00203	0.99797	80.33
35.5	7,398,732.96	233,206.00	0.03152	0.96848	80.17
36.5	7,002,646.88	161,806.00	0.02311	0.97689	77.64
37.5	6,642,923.46	4,463.00	0.00067	0.99933	75.85
38.5	5,974,378.68	151,509.00	0.02536	0.97464	75.80
39.5	1,179,474.87	11,504.00	0.00975	0.99025	73.88
40.5	1,109,123.87	72,076.00	0.06498	0.93502	73.16
41.5	809,168.91	5,110.00	0.00632	0.99368	68.41
42.5	798,215.91	13,107.00	0.01642	0.98358	67.98
43.5	689,810.29	28,247.00	0.04095	0.95905	66.86
44.5	995,198.28	13,293.00	0.01336	0.98664	64.12
45.5	428,519.28	1,734.00	0.00405	0.99595	63.26
46.5	420,879.28	23,804.00	0.05656	0.94344	63.00
47.5	395,728.28	6,012.00	0.01515	0.98485	59.44
48.5	365,332.31	177.00	0.00048	0.99952	58.54
49.5	312,787.76	0.00	0.00000	1.00000	58.51
50.5	312,210.76	59,244.00	0.18976	0.81024	58.51
51.5	243,986.25	403.00	0.00165	0.99835	47.41
52.5	243,583.25	327.00	0.00134	0.99866	47.33

Observed Life Table

Scenario: KEPCO TRANSMISSION 2008

Account: KEPCo 101/6 353 - KY

Placement Band: 1916 - 2008

Observation Band: 1999 - 2008

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Age at Beginning of Interval	Exposures at Beginning of Interval	Retirements During Interval	Retirement Ratio	Survivor Ratio	Percent Surv at Beginning of Interval
53.5	242,359.25	8,887.00	0.03667	0.96333	47.27
54.5	7,575.00	0.00	0.00000	1.00000	45.54
55.5	0.00	0.00	0.00000	1.00000	45.54

Surviving Percent Report

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Scenario: KEPCO TRANSMISSION 2008

Account: KEPCo 101/6 353 - KY

Placement Band: 1916 - 2008

Observation Band: 1999- 2008

Age	Actual	L0 75.00	R2 42.00
0.0	100.00	100.00	100.00
0.5	99.99	100.00	99.91
1.5	99.97	99.68	99.71
2.5	99.95	99.45	99.49
3.5	99.52	99.19	99.15
4.5	99.49	98.89	98.89
5.5	99.32	98.24	98.49
6.5	98.64	97.88	98.19
7.5	98.61	97.11	97.88
8.5	98.57	96.70	97.37
9.5	98.29	96.27	97.01
10.5	98.18	95.38	96.43
11.5	98.13	94.92	96.01
12.5	97.68	94.45	95.56
13.5	97.36	93.47	94.85
14.5	97.14	92.97	94.34
15.5	97.11	92.46	93.80
16.5	96.81	91.41	92.93
17.5	95.49	90.88	92.32
18.5	93.97	90.33	91.34
19.5	93.11	89.78	90.64
20.5	92.85	88.67	89.90
21.5	92.66	88.10	88.73
22.5	92.40	87.53	87.89
23.5	90.64	86.37	87.02
24.5	90.37	85.78	85.63
25.5	89.66	85.19	84.65
26.5	89.12	83.99	83.09
27.5	89.02	83.39	81.98
28.5	85.26	82.79	80.83
29.5	83.75	81.57	79.01
30.5	83.18	80.95	77.73
31.5	82.59	80.34	76.39
32.5	82.37	79.10	74.29
33.5	82.04	78.48	72.82
34.5	80.36	77.86	70.50
35.5	80.19	76.62	68.88
36.5	77.66	75.99	67.21
37.5	75.87	75.37	64.60
38.5	75.82	74.12	62.79
39.5	73.90	73.50	59.97
40.5	73.18	72.87	58.04
41.5	68.42	71.62	56.05
42.5	67.99	71.00	53.00
43.5	66.87	70.38	50.91
44.5	64.13	69.13	48.79
45.5	63.28	68.51	45.57
46.5	63.02	67.89	43.40
47.5	59.46	66.65	40.12
48.5	58.56	66.04	37.93
49.5	58.53	65.42	35.75
50.5	58.53	64.19	32.51
51.5	47.42	63.57	30.39
52.5	47.34	62.96	27.27
53.5	47.28	61.74	25.25

Surviving Percent Report

Scenario: KEPCO TRANSMISSION 2008

Account: KEPCO 101/6 353 - KY

Placement Band: 1916 - 2008

Observation Band: 1999- 2008

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Age	Actual	L0 75.00	R2 42.00
54.5	45.55	61.13	23.28
55.5	45.55	60.52	20.45
56.5	45.55	59.31	18.65
57.5	45.55	58.70	16.93
58.5	45.55	58.10	14.51
59.5	45.55	56.90	13.00
60.5	45.55	56.31	10.91
61.5	45.55	55.71	9.62
62.5	45.55	54.53	8.43
63.5	45.55	53.94	6.81
64.5	45.55	53.35	5.84
65.5	45.55	52.18	4.96
66.5	45.55	51.60	3.79
67.5	45.55	51.02	3.12
68.5	45.55	49.87	2.24
69.5	45.55	49.30	1.75
70.5	45.55	48.17	1.33
71.5	45.55	47.60	0.82
72.5	45.55	47.04	0.56
73.5	45.55	45.92	0.28
74.5	45.55	45.37	0.16
75.5	45.55	44.82	0.07
76.5	45.55	43.73	0.01
77.5	45.55	43.18	0
78.5	45.55	42.64	0
79.5	45.55	41.57	0
80.5	45.55	41.04	
81.5	45.55	40.52	
82.5	45.55	39.47	
83.5	45.55	38.95	
84.5	45.55	38.44	
85.5	45.55	37.42	
86.5	45.55	36.91	
87.5	45.55	36.41	
88.5	45.55	35.42	
89.5	45.55	34.93	
90.5	45.55	34.44	
91.5	45.55	33.48	
92.5	45.55	33.00	

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KENTUCKY POWER COMPANY
 Depreciation Study as of December 31, 2008
 Transmission Plant

Account	<u>354 TOWERS & FIXTURES</u>	
Depreciable Balance	\$94,722,543	
	<u>Current</u>	<u>Recommended</u>
Average Service Life (Yrs)	45	50
Iowa Curve	R3.0	R3.0
Gross Removal, %		75%
Gross Salvage, %		10%
Net Salvage %	0%	-65%

 This account has experienced minimal retirements. The simulation analyses of all bands do not provide meaningful results. Based on the limited retirements and the age of the investments in this account, the recommendation is to retain the current average service life of 45 years following an R3.0 type dispersion.

The cost of removing the towers will be labor and equipment intensive. Scrap salvage should be expected from the sale of the towers.

Simulated Plant Record Analysis
 Kentucky Power - Transm

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Account: KEPCo 101/6 354 - KY
 Version: KEPCO TRANSMISSION 2008
 Method: Simulated Balances

No. of Test Points: 40 Interval: 0 Observation Band: 1969 - 2008

Dispersion	Avg Service Life	Sum of Squared Differences	Index of Variation	Conformance Index	Retirement Experience Index
R0.5	1243.0	4.80E+11	1.9546	511.61	2.52
R1	852.1	4.86E+11	1.9662	508.60	2.62
R1.5	593.5	4.94E+11	1.9836	504.13	2.74
S-.5	891.5	5.01E+11	1.9980	500.50	2.78
R2	344.9	5.26E+11	2.0470	488.52	3.30
R2.5	225.0	5.73E+11	2.1351	468.36	4.35
L0.5	478.9	6.58E+11	2.2896	436.76	4.14
L1	289.7	6.62E+11	2.2951	435.71	5.79
L0	641.4	6.68E+11	2.3064	433.58	4.04
L1.5	201.7	7.98E+11	2.5207	396.72	8.64
R3	121.3	8.38E+11	2.5837	387.04	12.84
S0	312.1	8.78E+11	2.6445	378.14	5.98
S0.5	226.2	9.28E+11	2.7176	367.97	7.57
SQ	47.0	1.10E+12	2.9531	338.63	100.00
J6	48.2	1.14E+12	3.0183	331.31	100.00
S1	141.8	1.27E+12	3.1741	315.05	15.45
L2	127.7	1.30E+12	3.2114	311.39	20.57
S1.5	116.5	1.31E+12	3.2281	309.78	21.07
S5	51.0	1.39E+12	3.3252	300.73	100.00
R4	70.5	1.47E+12	3.4223	292.20	77.15
S2	88.7	1.59E+12	3.5649	281.30	40.39
R5	53.5	1.60E+12	3.5720	279.96	100.00
L3	83.3	1.61E+12	3.5765	279.60	53.49
L5	54.3	1.63E+12	3.6002	277.76	99.49
S4	56.4	1.71E+12	3.6940	270.71	99.62
S3	68.0	1.76E+12	3.7425	267.20	78.42
L4	63.8	1.78E+12	3.7653	265.58	87.60

Simulated Plant Record Analysis
 Kentucky Power - Transm

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Account: KEPCo 101/6 354 - KY
 Version: KEPCO TRANSMISSION 2008
 Method: Simulated Balances

No. of Test Points: 20 Interval: 0 Observation Band: 1989 - 2008

Dispersion	Avg Service Life	Sum of Squared Differences	Index of Variation	Conformance Index	Retirement Experience Index
R0.5	1279.3	3.20E+11	1.4803	675.54	2.45
R1	877.0	3.24E+11	1.4904	670.96	2.54
R1.5	610.8	3.31E+11	1.5056	664.19	2.65
S-.5	918.8	3.36E+11	1.5188	658.41	2.69
R2	351.5	3.55E+11	1.5605	640.82	3.22
R2.5	229.3	3.90E+11	1.6359	611.28	4.21
L0.5	486.0	4.58E+11	1.7727	564.11	4.06
L1	293.9	4.60E+11	1.7759	563.09	5.63
L0	657.3	4.68E+11	1.7919	558.07	3.90
L1.5	204.7	5.69E+11	1.9753	506.25	8.36
R3	123.6	6.01E+11	2.0305	492.49	12.13
S0	315.3	6.30E+11	2.0785	481.12	5.88
S0.5	230.8	6.70E+11	2.1432	466.59	7.28
SQ	46.3	7.20E+11	2.2227	449.90	100.00
.6	48.4	8.54E+11	2.4342	410.81	100.00
S1	142.4	9.53E+11	2.5562	391.21	15.29
L2	129.6	9.77E+11	2.5888	386.28	19.73
S1.5	118.2	9.89E+11	2.6042	384.00	20.27
S5	51.2	1.09E+12	2.7288	366.46	100.00
R4	71.1	1.13E+12	2.7884	358.63	75.26
S2	89.1	1.23E+12	2.9048	344.26	39.92
L3	83.7	1.25E+12	2.9223	342.20	52.92
R5	54.2	1.27E+12	2.9460	339.44	100.00
L5	54.8	1.29E+12	2.9790	335.68	99.39
S4	56.6	1.37E+12	3.0657	326.19	99.57
S3	68.3	1.39E+12	3.0891	323.72	77.79
L4	63.8	1.41E+12	3.1109	321.45	87.71

Simulated Plant Record Analysis
 Kentucky Power - Transm

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Account: KEPCo 101/6 354 - KY
 Version: KEPCO TRANSMISSION 2008
 Method: Simulated Balances

No. of Test Points: 10 Interval: 0 Observation Band: 1999 - 2008

Dispersion	Avg Service Life	Sum of Squared Differences	Index of Variation	Conformance Index	Retirement Experience Index
R0.5	1462.1	2.08E+10	0.4941	2023.88	2.14
R1	1002.3	2.12E+10	0.4988	2004.81	2.20
R1.5	698.1	2.19E+10	0.5071	1972.00	2.29
S-.5	1046.7	2.24E+10	0.5125	1951.22	2.33
R2	401.7	2.47E+10	0.5386	1856.67	2.68
R2.5	256.9	2.88E+10	0.5811	1720.87	3.44
L0.5	542.2	3.61E+10	0.6511	1535.86	3.45
L0	726.1	3.75E+10	0.6632	1507.84	3.40
L1	324.7	3.76E+10	0.6646	1504.66	4.63
L1.5	222.6	5.39E+10	0.7954	1257.23	6.93
S0	343.2	5.92E+10	0.8340	1199.04	5.10
R3	133.0	5.94E+10	0.8351	1197.46	9.77
S0.5	248.7	6.60E+10	0.8805	1135.72	6.29
S1	151.9	1.22E+11	1.1981	834.65	13.12
L2	136.0	1.28E+11	1.2258	815.79	17.17
S1.5	123.6	1.32E+11	1.2427	804.70	17.96
R4	73.1	1.77E+11	1.4429	693.05	68.99
S2	92.3	2.01E+11	1.5373	650.49	36.32
L3	86.9	2.08E+11	1.5641	639.35	48.14
S6	49.4	2.24E+11	1.6227	616.26	100.00
S5	52.2	2.36E+11	1.6634	601.18	100.00
R5	55.2	2.46E+11	1.7012	587.82	100.00
S3	69.6	2.61E+11	1.7494	571.62	75.00
L4	65.6	2.61E+11	1.7518	570.84	85.27
L5	55.8	2.74E+11	1.7947	557.20	99.13
S4	57.7	2.90E+11	1.8437	542.39	99.26
SQ	49.1	3.95E+11	2.1547	464.10	100.00

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10/20/2009

Act/Y	Additions	Retirements	Ending Balance
2008	\$2,400,232	\$646	\$94,722,543
2007	\$0	\$0	\$92,322,958
2006	\$0	\$20,749	\$92,322,958
2005	\$16,026	\$36,676	\$92,343,707
2004	\$5,437	\$0	\$92,364,357
2003	\$27,463	\$2,124	\$92,358,920
2002	\$96,142	\$4,473	\$92,333,581
2001	\$994,594	\$405	\$92,241,911
2000	\$657,177	\$0	\$91,247,723
1999	\$4,771,185	\$0	\$90,590,545
1998	\$6,759,532	\$0	\$85,819,360
1997	\$860,276	\$9,923	\$79,059,828
1996	\$363,575	\$894	\$78,209,475
1995	\$315,635	\$0	\$77,846,794
1994	\$0	\$0	\$77,531,159
1993	\$182,665	\$5,820	\$77,531,159
1992	\$41,132	\$2,222	\$77,354,314
1991	\$15	\$1,436	\$77,315,404
1990	\$427,812	\$68,846	\$77,316,825
1989	\$0	\$14,276	\$76,957,859
1988	\$0	\$0	\$76,972,135
1987	\$0	\$0	\$76,972,135
1986	\$783,128	\$193,509	\$76,972,135
1985	\$59,889,883	\$0	\$76,382,916
1984	\$177,806	\$43,412	\$16,493,033
1983	\$0	\$11,161	\$16,358,639
1982	\$273,723	\$17,051	\$16,369,800
1981	\$0	\$0	\$16,113,128
1980	\$0	\$15,975	\$16,113,128
1979	\$0	\$0	\$16,129,103
1978	\$81,431	\$0	\$16,129,103
1977	\$28,623	\$0	\$16,047,672
1976	\$158,516	\$9,324	\$16,019,049
1975	\$72,763	\$3,317	\$15,869,857
1974	\$20,383	\$2,557	\$15,800,411

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Act.Yr.	Additions	Retirements	Ending Balance
1973	\$112,943	\$0	\$15,782,585
1972	\$8,487,428	\$8,796	\$15,669,642
1971	\$26,158	\$0	\$7,241,010
1970	\$4,036,456	\$0	\$7,184,852
1969	\$0	\$0	\$3,148,396
1968	\$768,389	\$0	\$3,148,396
1967	\$370,618	\$33,709	\$2,380,007
1966	\$19,067	\$0	\$2,043,098
1965	\$450,200	\$259	\$2,024,031
1964	\$97,303	\$0	\$1,574,091
1963	\$681,030	\$5,906	\$1,476,788
1962	\$115,749	\$0	\$801,663
1961	\$227	\$0	\$685,914
1960	\$0	\$0	\$685,687
1959	\$376,337	\$0	\$685,687
1958	\$9,324	\$0	\$309,350
1957	\$0	\$0	\$300,026
1956	\$8,760	\$0	\$300,026
1955	\$0	\$0	\$291,266
1954	\$65,848	\$0	\$291,266
1953	\$0	\$0	\$225,418
1952	\$0	\$0	\$225,418
1951	\$0	\$0	\$225,418
1950	\$0	\$0	\$225,418
1949	\$0	\$0	\$225,418
1948	\$0	\$0	\$225,418
1947	\$0	\$0	\$225,418
1946	\$0	\$0	\$225,418
1945	\$0	\$0	\$225,418
1944	\$1,370	\$0	\$225,418
1943	\$0	\$0	\$224,048
1942	\$184,841	\$0	\$224,048
1941	\$0	\$0	\$39,207
1940	\$2,696	\$0	\$39,207
1939	\$848	\$0	\$36,571

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Acct Yr	Additions	Retirements	Ending Balance
1938	\$7,093	\$0	\$35,723
1937	\$0	\$0	\$28,630
1936	\$462	\$0	\$28,630
1935	\$0	\$0	\$28,168
1934	\$0	\$0	\$28,168
1933	\$45	\$0	\$28,168
1932	\$539	\$0	\$28,123
1931	\$0	\$0	\$27,584
1930	\$2,645	\$0	\$27,584
1929	\$18,867	\$0	\$24,939
1928	\$5,349	\$0	\$6,072
1927	\$723	\$0	\$723

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KENTUCKY POWER COMPANY
Depreciation Study as of December 31, 2008
Transmission Plant

Account	<u>355 POLES & FIXTURES</u>	
Depreciable Balance	\$48,384,844	
	<u>Current</u>	<u>Recommended</u>
Average Service Life (Yrs)	43	38
Iowa Curve	R3.0	S4.0
Gross Removal, %		55%
Gross Salvage, %		2%
Net Salvage %	0%	-53%

Both the 40 year and 20 year simulation band analyses indicate that the average service life for this account is 38 years following an S4.0 type retirement dispersion pattern.

The removal cost for poles involves significant labor, equipment and transportation costs since the poles must be transported back to the storeroom for disposal. There could be some reuse salvage of insulators and crossarms.

Simulated Plant Record Analysis
 Kentucky Power - Transm

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Account: KEPCo 101/6 355 - KY
 Version: KEPCO TRANSMISSION 2008
 Method: Simulated Balances

No. of Test Points: 40 Interval: 0 Observation Band: 1969 - 2008

Dispersion	Avg Service Life	Sum of Squared Differences	Index of Variation	Conformance Index	Retirement Experience Index
S4	37.6	7.87E+11	8.2291	121.52	100.00
L4	39.0	7.95E+11	8.2697	120.92	99.90
L5	37.3	8.11E+11	8.3571	119.66	100.00
S3	39.7	8.96E+11	8.7819	113.87	99.99
S5	36.6	9.34E+11	8.9655	111.54	100.00
L3	42.3	9.37E+11	8.9812	111.34	95.73
R5	36.9	1.00E+12	9.3005	107.52	100.00
R4	38.6	1.05E+12	9.5136	105.11	100.00
S2	42.6	1.11E+12	9.7532	102.53	98.72
R3	41.9	1.22E+12	10.2399	97.66	100.00
L2	48.3	1.25E+12	10.3932	96.22	84.53
S1.5	45.3	1.27E+12	10.4616	95.59	94.09
R2.5	45.4	1.36E+12	10.8139	92.47	97.29
S6	36.4	1.40E+12	10.9634	91.21	100.00
J1	48.2	1.43E+12	11.0913	90.16	86.81
L1.5	53.9	1.48E+12	11.2712	88.72	74.94
R2	50.3	1.52E+12	11.4235	87.54	86.45
S0.5	53.9	1.62E+12	11.8173	84.62	73.68
L1	60.9	1.63E+12	11.8496	84.39	64.37
R1.5	58.5	1.76E+12	12.2889	81.37	65.55
S0	61.4	1.79E+12	12.3998	80.65	60.21
L0.5	72.7	1.82E+12	12.5164	79.90	52.95
R1	69.8	1.93E+12	12.8958	77.54	47.89
L0	86.7	1.96E+12	12.9760	77.07	44.46
S-.5	80.6	1.97E+12	13.0146	76.84	42.50
R0.5	88.4	2.04E+12	13.2631	75.40	36.55
SQ	38.1	5.71E+12	22.1617	45.12	100.00

Simulated Plant Record Analysis
 Kentucky Power - Transm

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Account: KEPCo 101/6 355 - KY
 Version: KEPCO TRANSMISSION 2008
 Method: Simulated Balances

No. of Test Points: 20 Interval: 0 Observation Band: 1989 - 2008

Dispersion	Avg Service Life	Sum of Squared Differences	Index of Variation	Conformance Index	Retirement Experience Index
S4	37.5	6.29E+11	6.4535	154.95	100.00
L4	39.0	6.33E+11	6.4752	154.44	99.91
L5	37.3	6.60E+11	6.6129	151.22	100.00
S3	39.7	7.32E+11	6.9601	143.68	99.99
S5	36.6	7.67E+11	7.1272	140.31	100.00
L3	42.3	7.67E+11	7.1273	140.31	95.74
R5	36.9	8.26E+11	7.3934	135.26	100.00
R4	38.6	8.42E+11	7.4682	133.90	100.00
S2	42.2	9.16E+11	7.7896	128.38	98.95
R3	41.9	1.00E+12	8.1355	122.92	100.00
L2	48.3	1.04E+12	8.3083	120.36	84.55
S1.5	44.9	1.06E+12	8.3759	119.39	94.68
R2.5	45.4	1.11E+12	8.5565	116.87	97.31
S1	48.2	1.18E+12	8.8448	113.06	86.82
.1.5	53.9	1.21E+12	8.9514	111.71	74.96
S6	36.4	1.22E+12	8.9698	111.49	100.00
R2	49.7	1.22E+12	8.9728	111.45	87.52
S0.5	53.9	1.31E+12	9.3257	107.23	73.69
L1	60.9	1.33E+12	9.3763	106.65	64.38
R1.5	57.9	1.36E+12	9.4958	105.31	66.71
S0	60.8	1.43E+12	9.7159	102.92	61.00
L0.5	71.9	1.43E+12	9.7381	102.69	53.56
R1	69.0	1.47E+12	9.8537	101.48	48.68
S-.5	79.8	1.50E+12	9.9688	100.31	43.02
L0	85.8	1.52E+12	10.0271	99.73	44.95
R0.5	86.6	1.53E+12	10.0605	99.40	37.47
SQ	38.1	5.40E+12	18.9172	52.86	100.00

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Simulated Plant Record Analysis
 Kentucky Power - Transm

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Account: KEPCo 101/6 355 - KY
 Version: KEPCO TRANSMISSION 2008
 Method: Simulated Balances

No. of Test Points: 10 Interval: 0 Observation Band: 1999 - 2008

Dispersion	Avg Service Life	Sum of Squared Differences	Index of Variation	Conformance Index	Retirement Experience Index
R0.5	82.4	7.15E+10	2.2592	442.63	39.85
R1	66.4	7.94E+10	2.3800	420.17	51.80
S-.5	76.3	8.00E+10	2.3901	418.39	45.45
L0	82.1	9.09E+10	2.5465	392.70	47.14
R1.5	56.2	9.10E+10	2.5486	392.37	70.04
L0.5	69.5	9.72E+10	2.6343	379.61	55.64
L1	58.8	9.87E+10	2.6545	376.72	66.77
S0	59.1	1.07E+11	2.7665	361.47	53.34
R2	48.8	1.14E+11	2.8476	351.17	89.44
S0.5	52.3	1.15E+11	2.8636	349.21	76.36
L1.5	52.6	1.16E+11	2.8726	348.12	76.64
S1	47.3	1.28E+11	3.0212	330.99	88.43
R2.5	44.5	1.36E+11	3.1117	321.37	98.05
L2	47.6	1.39E+11	3.1527	317.19	85.43
L1.5	44.5	1.46E+11	3.2285	309.74	95.19
S2	41.8	1.52E+11	3.2899	303.96	99.15
R3	41.0	1.84E+11	3.6274	275.68	100.00
L3	41.7	1.88E+11	3.6645	272.89	96.25
S3	38.9	2.38E+11	4.1173	242.88	100.00
L4	38.8	3.05E+11	4.6655	214.34	99.92
R4	38.2	3.52E+11	5.0137	199.45	100.00
S4	37.6	3.99E+11	5.3398	187.27	100.00
L5	37.1	5.00E+11	5.9767	167.32	100.00
S5	36.6	6.15E+11	6.6230	150.99	100.00
R5	36.9	6.46E+11	6.7913	147.25	100.00
S6	36.4	1.02E+12	8.5424	117.06	100.00
SQ	38.9	7.67E+12	23.4019	42.73	100.00

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Act. Yr.	Additions	Retirements	Ending Balance
2008	\$7,821,843	\$331,274	\$48,384,844
2007	\$547,335	\$147,838	\$40,894,275
2006	\$1,905,268	\$267,008	\$40,494,778
2005	\$1,400,727	\$45,454	\$38,856,517
2004	\$1,450,694	\$358,451	\$37,501,245
2003	\$725,788	\$23,421	\$36,409,002
2002	\$1,374,086	\$169,001	\$35,706,635
2001	\$3,034,077	\$129,176	\$34,501,550
2000	\$2,016,921	\$380,242	\$31,596,649
1999	\$7,276,249	\$459,086	\$29,959,970
1998	\$246,198	\$70,017	\$23,142,807
1997	\$2,200,205	\$189,108	\$22,966,626
1996	\$966,627	\$46,630	\$20,955,529
1995	\$502,094	\$39,055	\$20,035,533
1994	\$2,853,695	\$49,130	\$19,572,494
1993	\$2,024,333	\$250,034	\$16,767,929
1992	\$1,980,376	\$164,329	\$14,993,630
1991	\$1,225,759	\$71,533	\$13,177,583
1990	\$379,655	\$23,776	\$12,023,357
1989	\$526,772	\$0	\$11,667,478
1988	\$501,638	\$3,739	\$11,140,706
1987	\$203,776	\$6,838	\$10,642,607
1986	\$743,795	\$0	\$10,440,869
1985	\$286,320	\$11,886	\$9,697,074
1984	\$129,011	\$5,073	\$9,422,640
1983	\$472,313	\$207	\$9,298,701
1982	\$1,190,540	\$14,204	\$8,826,595
1981	\$831,547	\$661	\$7,650,160
1980	\$971,067	\$6,242	\$6,819,174
1979	\$163,523	\$2,975	\$5,954,349
1978	\$400,964	\$0	\$5,693,801
1977	\$372,518	\$0	\$5,292,837
1976	\$465,135	\$91,810	\$4,920,319
1975	\$413,882	\$1,556	\$4,546,994
1974	\$343,018	\$34,862	\$4,134,968

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Act. Yr.	Additions	Retirements	Ending Balance
1973	\$125,643	\$5,370	\$3,826,812
1972	\$154,289	\$5,093	\$3,706,539
1971	\$241,075	\$2,120	\$3,557,343
1970	\$5,279	\$1,424	\$3,318,387
1969	\$331,595	\$1,640	\$3,314,532
1968	\$245,351	\$245	\$2,984,577
1967	\$434,577	\$110,772	\$2,739,471
1966	\$672,143	\$0	\$2,415,666
1965	\$586,942	\$818	\$1,743,523
1964	\$116,699	\$3,754	\$1,157,398
1963	\$40,074	\$3,221	\$1,044,453
1962	\$83,740	\$461	\$1,007,600
1961	\$83,310	\$91	\$924,321
1960	\$80,558	\$330	\$871,102
1959	\$72,589	\$1,163	\$790,873
1958	\$31,500	\$2,062	\$719,448
1957	\$12,111	\$1,344	\$690,009
1956	\$52,891	\$1,562	\$679,242
1955	\$11,248	\$2,462	\$628,013
1954	\$159,562	\$5,534	\$619,227
1953	\$59,562	\$0	\$465,179
1952	\$9,029	\$0	\$405,617
1951	\$4,317	\$0	\$396,588
1950	\$2,849	\$0	\$392,271
1949	\$16,466	\$0	\$389,422
1948	\$2,881	\$0	\$372,956
1947	\$802	\$0	\$370,075
1946	\$1,398	\$0	\$369,273
1945	\$11,766	\$0	\$367,875
1944	\$76,227	\$0	\$356,089
1943	\$0	\$0	\$279,862
1942	\$164,194	\$0	\$279,862
1941	\$2,006	\$0	\$115,668
1940	\$0	\$0	\$113,662
1939	\$0	\$0	\$113,662

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Act Yr	Additions	Retirements	Ending Balance
1938	\$113,662	\$0	\$113,662

\$0

\$0

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KENTUCKY POWER COMPANY
 Depreciation Study as of December 31, 2008
 Transmission Plant

Account	<u>356 OVERHEAD CONDUCTOR & DEVICES</u>	
Depreciable Balance	\$109,075,670	
	<u>Current</u>	<u>Recommended</u>
Average Service Life (Yrs)	50	50
Iowa Curve	R3.0	R3.0
Gross Removal, %		25%
Gross Salvage, %		15%
Net Salvage %	10%	-10%

 The simulation analyses for all bands do not provide meaningful guidance since the retirements from this account have been minimal. The recommendation is to continue the current 50 year average service life following an R3.0 type retirement dispersion.

Removal costs should be expected from the labor and transportation costs involved in removing the conductor. Salvage costs would be expected from the sale of the conductor and the reuse of circuit breakers, insulators and switches.

Simulated Plant Record Analysis
 Kentucky Power - Transm

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Account: KEPCo 101/6 356 - KY
 Version: KEPCO TRANSMISSION 2008
 Method: Simulated Balances

No. of Test Points: 40 Interval: 0 Observation Band: 1969 - 2008

Dispersion	Avg Service Life	Sum of Squared Differences	Index of Variation	Conformance Index	Retirement Experience Index
L0	302.1	3.09E+11	1.5234	656.43	12.26
L0.5	225.6	3.13E+11	1.5344	651.72	14.39
R2	146.7	3.16E+11	1.5424	648.34	14.83
R2.5	106.3	3.27E+11	1.5688	637.43	26.08
S-.5	343.7	3.42E+11	1.6042	623.36	9.10
R1.5	227.2	3.48E+11	1.6167	618.54	9.57
R1	316.6	3.63E+11	1.6533	604.85	8.35
L1	151.6	3.72E+11	1.6736	597.51	23.41
R0.5	450.1	3.78E+11	1.6856	593.26	7.60
S0	170.1	4.07E+11	1.7484	571.95	17.94
S0.5	131.6	4.88E+11	1.9149	522.22	23.96
L1.5	118.5	5.06E+11	1.9508	512.61	32.35
R3	77.1	6.43E+11	2.1992	454.71	63.83
S1	96.3	9.19E+11	2.6286	380.43	40.79
.2	90.3	1.00E+12	2.7471	364.02	52.03
S1.5	82.8	1.06E+12	2.8200	354.61	54.64
S6	46.8	1.11E+12	2.8876	346.31	100.00
S5	48.9	1.36E+12	3.1945	313.04	100.00
R5	50.5	1.41E+12	3.2519	307.51	100.00
S2	70.1	1.53E+12	3.3870	295.25	76.06
L3	67.4	1.55E+12	3.4159	292.75	80.86
R4	58.1	1.57E+12	3.4329	291.30	99.99
L5	51.0	1.59E+12	3.4589	289.11	99.99
L4	56.6	1.66E+12	3.5322	283.11	97.73
SQ	47.0	1.74E+12	3.6178	276.41	100.00
S4	52.0	1.77E+12	3.6480	274.12	100.00
S3	58.7	1.83E+12	3.7096	269.57	97.54

Simulated Plant Record Analysis
 Kentucky Power - Transm

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Account: KEPCo 101/6 356 - KY
 Version: KEPCO TRANSMISSION 2008
 Method: Simulated Balances

No. of Test Points: 20 Interval: 0 Observation Band: 1989 - 2008

Dispersion	Avg Service Life	Sum of Squared Differences	Index of Variation	Conformance Index	Retirement Experience Index
L0	302.2	1.81E+11	1.0805	925.50	12.26
L0.5	227.9	1.85E+11	1.0916	916.09	14.16
R2.5	107.4	1.99E+11	1.1327	882.85	25.40
R2	146.7	2.10E+11	1.1637	859.33	14.83
L1	151.6	2.21E+11	1.1936	837.80	23.40
S0	170.1	2.27E+11	1.2103	826.24	17.94
S-.5	347.2	2.50E+11	1.2688	788.15	8.99
R1.5	227.2	2.56E+11	1.2840	778.82	9.57
R1	316.6	2.75E+11	1.3306	751.54	8.35
S0.5	131.6	2.85E+11	1.3557	737.63	23.95
R0.5	450.1	2.91E+11	1.3685	730.73	7.60
L1.5	119.7	3.10E+11	1.4134	707.51	31.72
R3	77.1	4.14E+11	1.6335	612.18	63.82
S1	97.3	6.26E+11	2.0083	497.93	39.99
L2	90.3	6.87E+11	2.1047	475.13	52.02
S6	47.2	7.18E+11	2.1516	464.77	100.00
S1.5	83.7	7.41E+11	2.1847	457.73	53.55
S5	48.9	9.50E+11	2.4741	404.19	100.00
R5	50.5	9.56E+11	2.4818	402.93	100.00
S2	70.1	1.14E+12	2.7078	369.30	76.04
L3	67.4	1.15E+12	2.7175	367.99	80.85
R4	58.7	1.16E+12	2.7285	366.50	99.98
L5	51.0	1.17E+12	2.7404	364.91	99.99
SQ	47.0	1.17E+12	2.7500	363.64	100.00
L4	56.5	1.21E+12	2.7895	358.49	97.73
S4	52.0	1.36E+12	2.9563	338.26	100.00
S3	58.8	1.41E+12	3.0115	332.06	97.54

Simulated Plant Record Analysis
 Kentucky Power - Transm

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Account: KEPCo 101/6 356 - KY
 Version: KEPCO TRANSMISSION 2008
 Method: Simulated Balances

No. of Test Points: 10 Interval: 0 Observation Band: 1999 - 2008

Dispersion	Avg Service Life	Sum of Squared Differences	Index of Variation	Conformance Index	Retirement Experience Index
R0.5	432.6	3.30E+10	0.5700	1754.39	7.92
R1	307.3	3.89E+10	0.6191	1615.25	8.64
R1.5	220.5	4.62E+10	0.6744	1482.80	9.97
S-.5	333.5	4.75E+10	0.6841	1461.77	9.44
R2	143.8	8.03E+10	0.8892	1124.61	15.42
L0	297.8	1.08E+11	1.0332	967.87	12.50
L0.5	224.6	1.16E+11	1.0704	934.23	14.50
R2.5	106.3	1.36E+11	1.1578	863.71	26.08
L1	150.9	1.91E+11	1.3716	729.08	23.60
S0	169.3	2.04E+11	1.4163	706.07	18.06
S0.5	132.3	2.63E+11	1.6081	621.85	23.71
L1.5	119.1	2.88E+11	1.6836	593.97	32.01
SQ	45.4	3.73E+11	1.9164	521.81	100.00
R3	77.1	3.77E+11	1.9262	519.16	63.82
J1	97.8	5.06E+11	2.2321	448.01	39.56
L2	90.7	5.52E+11	2.3319	428.83	51.56
S1.5	84.1	5.85E+11	2.4004	416.60	52.96
S6	47.0	6.58E+11	2.5457	392.82	100.00
R5	50.5	8.23E+11	2.8478	351.15	100.00
S2	70.5	8.54E+11	2.9011	344.70	75.39
R4	58.7	8.55E+11	2.9021	344.58	99.98
L3	67.8	8.71E+11	2.9288	341.44	80.45
L4	56.8	9.03E+11	2.9822	335.32	97.57
S5	49.2	9.07E+11	2.9886	334.60	100.00
L5	51.3	1.01E+12	3.1493	317.53	99.98
S3	59.1	1.04E+12	3.2072	311.80	97.31
S4	52.3	1.09E+12	3.2804	304.84	100.00

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Act Yr	Additions	Retirements	Ending Balance
2008	\$7,616,245	\$149,255	\$109,076,670
2007	\$388,254	\$2,896	\$101,609,681
2006	\$278,653	\$126,720	\$101,224,323
2005	\$743,703	\$35,213	\$101,072,390
2004	\$244,995	\$55,180	\$100,363,900
2003	\$653,965	\$102,595	\$100,174,085
2002	\$203,910	\$107,844	\$99,622,715
2001	\$1,212,538	\$8,636	\$99,526,649
2000	\$1,907,562	\$112,146	\$98,322,748
1999	\$11,988,969	\$315,114	\$96,527,332
1998	\$4,941,738	\$140,443	\$84,853,476
1997	\$712,207	\$65,900	\$80,052,182
1996	\$1,377,965	\$34,379	\$79,425,875
1995	\$1,023,703	\$0	\$78,082,289
1994	\$3,258,062	\$17,616	\$77,058,586
1993	\$1,695,513	\$152,787	\$73,818,140
1992	\$2,241,118	\$80,152	\$72,275,414
1991	\$704,245	\$62,359	\$70,114,448
1990	\$430,845	\$3,248	\$69,472,562
1989	\$273,872	\$28,688	\$69,044,965
1988	\$187,297	\$71	\$68,799,781
1987	\$131,020	\$0	\$68,612,555
1986	\$838,491	\$73,842	\$68,481,535
1985	\$46,009,402	\$6,075	\$67,716,886
1984	\$171,899	\$26,128	\$21,713,559
1983	\$42,428	\$0	\$21,557,788
1982	\$1,827,109	\$78,806	\$21,525,360
1981	\$694,030	\$489	\$19,777,057
1980	\$452,258	\$31,345	\$19,083,516
1979	\$91,746	\$28	\$18,662,604
1978	\$2,009,798	\$0	\$18,570,886
1977	\$512,195	\$0	\$16,561,088
1976	\$229,904	\$0	\$16,048,893
1975	\$299,105	\$2,437	\$15,818,989
1974	\$44,958	\$22	\$15,522,321

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Act:Yr	Additions	Retirements	Ending Balance
1973	\$72,762	\$8,297	\$15,477,385
1972	\$158,182	\$4,566	\$15,412,920
1971	\$1,144,132	\$44	\$15,259,304
1970	\$8,258,593	\$0	\$14,115,216
1969	\$306,367	\$29,269	\$5,856,623
1968	\$1,214,668	\$124	\$5,579,525
1967	\$622,934	\$134,776	\$4,364,981
1966	\$235,126	\$0	\$3,876,823
1965	\$750,175	\$0	\$3,641,697
1964	\$332,032	\$1,576	\$2,891,522
1963	\$516,316	\$0	\$2,561,066
1962	\$116,770	\$0	\$2,044,750
1961	\$35,760	\$0	\$1,927,980
1960	\$34,230	\$0	\$1,892,220
1959	\$203,931	\$17	\$1,857,990
1958	\$363,538	\$101	\$1,654,076
1957	\$9,636	\$0	\$1,290,639
1956	\$41,375	\$0	\$1,281,003
1955	\$4,298	\$17	\$1,239,627
1954	\$318,765	\$489	\$1,235,346
1953	\$63,843	\$0	\$917,080
1952	\$15,004	\$0	\$853,237
1951	\$13,420	\$0	\$838,233
1950	\$4,533	\$0	\$824,813
1949	\$63,341	\$0	\$820,280
1948	\$14,823	\$0	\$766,939
1947	\$11,563	\$0	\$742,116
1946	\$5,928	\$0	\$730,553
1945	\$27,493	\$0	\$724,625
1944	\$5,349	\$0	\$687,132
1943	\$5,002	\$0	\$691,783
1942	\$378,305	\$0	\$686,781
1941	\$6,577	\$0	\$308,476
1940	\$101,822	\$0	\$301,895
1939	\$476	\$0	\$200,077

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10/20/2009

Act Yr	Additions	Retirements	Ending Balance
1938	\$129,975	\$0	\$199,601
1937	\$8,842	\$0	\$69,626
1936	\$9,973	\$0	\$60,784
1935	\$1,327	\$0	\$50,811
1934	\$2,159	\$0	\$49,484
1933	\$1,642	\$0	\$47,325
1932	\$2,108	\$0	\$45,683
1931	\$2,112	\$0	\$43,575
1930	\$4,553	\$0	\$41,463
1929	\$15,583	\$0	\$36,910
1928	\$3,395	\$0	\$21,327
1927	\$4,792	\$0	\$17,932
1926	\$8,395	\$0	\$13,140
1925	\$1,862	\$0	\$4,745
1924	\$369	\$0	\$2,883
1923	\$1,121	\$0	\$2,514
1922	\$1,393	\$0	\$1,393

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KENTUCKY POWER COMPANY
Depreciation Study as of December 31, 2008
Transmission Plant

Account	<u>356 UNDERGROUND CONDUIT</u>	
Depreciable Balance	\$11,590	
	<u>Current</u>	<u>Recommended</u>
Average Service Life (Yrs)	37	37
Iowa Curve	R2.0	R2.0
Gross Removal, %		0%
Gross Salvage, %		0%
Net Salvage %	0%	0%

No life analysis was performed for this account since there have been no retirements. The recommendation is to continue the current average service life of 37 years following an R2.0 type dispersion.

The underground conduit will likely be retired in place. Therefore the investment is not anticipated to incur removal or salvage cost.

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KENTUCKY POWER COMPANY
 Depreciation Study as of December 31, 2008
 Transmission Plant

Account	<u>358 UNDERGROUND CONDUCTOR & DEVICES</u>	
Depreciable Balance	\$106,066	
	<u>Current</u>	<u>Recommended</u>
Average Service Life (Yrs)	44	44
Iowa Curve	R1.0	R1.0
Gross Removal, %		0%
Gross Salvage, %		0%
Net Salvage %	0%	0%

As in account 357, there have been no retirements from this account. No life analysis was performed. The recommendation is to continue the current 44 year average service life following an R1.0 dispersion.

Do the minimal investment, neither removal or salvage is expected from the investment in this account.

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KENTUCKY POWER COMPANY
DEPRECIATION STUDY AS OF 12-31-08
TRANSMISSION PLANT WORKPAPERS

SALVAGE AND REMOVAL ANALYSIS

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KENTUCKY POWER COMPANY
 Transmission Plant Net Salvage Test

Year	Original Cost Retired by Plant Account								Total	Removal %	Net Salvage
	352	353	354.0	355.0	356.0	357	358	358			
1994	522	807,484	0	51,836	12,669	0	0	872,511	12%	101,360	
1995	2,589	143,408	0	50,733	0	0	0	196,730	-55%	-109,112	
1996	11,283	32,475	894	58,862	40,165	0	0	143,679	-8%	-11,869	
1997	6,190	1,056,611	9,923	205,721	85,900	0	0	1,364,345	1%	12,548	
1998	373	165,269	0	126,426	170,083	0	0	462,151	15%	68,230	
1999	852	357,124	0	459,086	315,114	0	0	1,132,176	18%	198,240	
2000	0	308,529	0	307,215	112,148	0	0	727,892	-4%	-29,822	
2001	852	104,157	405	129,175	8,636	0	0	243,225	-281%	-683,524	
2002	352	167,185	4,473	169,000	107,845	0	0	448,855	-4%	-17,372	
2003	0	462,374	2,124	23,422	102,595	0	0	590,515	-103%	-606,791	
2004	0	698,507	0	368,451	55,179	0	0	1,113,137	-9%	-95,408	
2005	57,776	687,089	36,676	45,455	35,212	0	0	862,208	-21%	-176,866	
2006	0	783,966	20,749	267,008	126,720	0	0	1,198,443	0%	4,099	
2007	2,382	298,345	0	147,839	2,897	0	0	451,463	-92%	-417,573	
2008	8458	1369350	646	331275	149255	0	0	1,858,984	-10%	-186,146	
TOTAL	91,629	7,442,873	75,890	2,731,504	1,324,418	0	0	11,666,314	-17%	-1,950,006	

EVALUATION BASED ON 1994-2008 ACTUAL

Total Retmits	91,629	7,442,873	75,890	2,731,504	1,324,418	0	0	11,666,314
Gross Removal %	0	-5	-65	-53	-10	0	0	-17
Gross Removal \$	0	-372,144	-49,329	-1,447,697	-132,442	0	0	-2,001,611

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KENTUCKY POWER COMPANY
 Transmission Plant Gross Removal Test

Year	Original Cost Retired by Plant Account								Total	Removal %	Functional Gross Removal
	352	353	354.0	355.0	356.0	357	358	359			
1994	522	807,484	0	51,836	12,669	0	0	872,511	11%	92,692	
1995	2,589	143,408	0	50,733	0	0	0	196,730	77%	151,723	
1996	11,283	32,475	894	58,862	40,165	0	0	143,679	-4%	-6,225	
1997	6,190	1,056,611	9,923	205,721	85,900	0	0	1,364,345	3%	39,136	
1998	373	165,269	0	126,426	170,083	0	0	462,151	47%	215,982	
1999	852	357,124	0	459,086	315,114	0	0	1,132,176	3%	33,535	
2000	0	308,529	0	307,215	112,148	0	0	727,892	7%	53,562	
2001	852	104,157	405	129,175	8,636	0	0	243,225	323%	785,132	
2002	352	167,185	4,473	169,000	107,845	0	0	448,855	11%	48,654	
2003	0	462,374	2,124	23,422	102,595	0	0	590,515	155%	912,736	
2004	0	699,507	0	358,451	55,179	0	0	1,113,137	20%	224,657	
2005	57,776	687,089	36,676	45,455	35,212	0	0	862,208	21%	176,975	
2006	0	783,966	20,749	267,008	126,720	0	0	1,198,443	12%	141,984	
2007	2,382	298,345	0	147,839	2,897	0	0	451,463	65%	292,847	
2008	8458	1369350	646	331275	149255	0	0	1,858,984	9%	176,513	
TOTAL	91,629	7,442,873	75,890	2,731,504	1,324,418	0	0	11,666,314	29%	3,339,903	

EVALUATION BASED ON 1994-2008 ACTUAL

	352	353	354	355	356	357	358	Total
Total Reimts	91,629	7,442,873	75,890	2,731,504	1,324,418	0	0	11,666,314
Gross Removal %	10	20	75	55	25	0	0	29
Gross Removal \$	9,163	1,488,575	56,918	1,502,327	331,105	0	0	3,388,087

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KENTUCKY POWER COMPANY
 Transmission Plant Gross Salvage Test

Year	Retirements						358	357	356.0	Total	Salvage %	Functional Gross Salvage
	352	353	354.0	355.0	356.0	357						
1994	522	807,484	0	51,836	12,669	0	0	0	872,511	22%	194,052	
1995	2,589	143,408	0	50,733	0	0	0	0	196,730	22%	42,611	
1996	11,283	32,475	894	58,862	40,165	0	0	0	143,679	-4%	-5,644	
1997	6,190	1,056,611	9,923	205,721	85,900	0	0	0	1,364,345	4%	51,684	
1998	373	165,269	0	126,426	170,083	0	0	0	462,151	61%	284,212	
1999	852	357,124	0	459,086	315,114	0	0	0	1,132,176	20%	231,775	
2000	0	308,529	0	307,215	112,148	0	0	0	727,892	3%	23,740	
2001	852	104,157	405	129,175	8,636	0	0	0	243,225	42%	101,608	
2002	352	167,185	4,473	169,000	107,845	0	0	0	448,855	7%	31,282	
2003	0	462,374	2,124	23,422	102,595	0	0	0	590,515	52%	305,945	
2004	0	699,507	0	358,451	55,179	0	0	0	1,113,137	12%	129,249	
2005	57,776	687,089	36,676	45,455	35,212	0	0	0	862,208	0%	109	
2006	0	783,966	20,749	267,008	126,720	0	0	0	1,198,443	12%	146,083	
2007	2,382	298,345	0	147,839	2,897	0	0	0	451,463	-28%	-124,726	
2008	8458	1369350	646	331275	149255	0	0	0	1,858,984	-1%	-9,633	
TOTAL	91,629	7,442,873	75,890	2,731,504	1,324,418	0	0	0	11,666,314	12%	1,402,347	

EVALUATION BASED ON 1994-2008 ACTUAL

Total Retmris	352	353	354	355	356	357	358	Total
Gross Salvage %	10	15	10	2	15	0	0	12
Gross Salvage \$	9,163	1,116,431	7,589	54,630	198,663	0	0	1,386,476

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KENTUCKY POWER COMPANY
DEPRECIATION STUDY AS OF 12-31-08
TRANSMISSION PLANT WORKPAPERS

CALCULATION OF AGE OF SIMULATED PLANT
BALANCES

Computed Age Distribution Report

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Account: KEPCo 101/6 354 - KY
 Version: KEPCO TRANSMISSION 2008
 Dispersion: 50 - R3

Vintage	Additions	Age 2009	Theoretical Survivors		Computed Survivors		Realized Life
			Percent	Amount	Percent	Amount	
2008	2,400,231	0.5	99.99	2,399,871	100.00	2,400,232	0.50
2005	16,025	3.5	99.86	16,003	100.00	16,026	3.50
2004	5,437	4.5	99.80	5,426	100.01	5,438	4.50
2003	27,462	5.5	99.74	27,390	100.00	27,463	5.50
2002	96,142	6.5	99.66	95,817	100.00	96,143	6.50
2001	994,593	7.5	99.58	990,366	100.00	994,594	7.50
2000	657,177	8.5	99.48	653,727	100.00	657,178	8.50
1999	4,771,185	9.5	99.36	4,740,697	100.00	4,771,186	9.50
1998	6,759,531	10.5	99.23	6,707,618	100.00	6,759,532	10.50
1997	860,276	11.5	99.09	852,413	100.00	860,277	11.50
1996	363,575	12.5	98.92	359,652	100.00	363,576	12.50
1995	315,635	13.5	98.74	311,642	100.00	315,636	13.50
1993	182,665	15.5	98.30	179,551	100.00	182,666	15.50
1992	41,132	16.5	98.04	40,325	100.00	41,133	16.50
1991	15	17.5	97.75	15	103.33	16	17.79
1990	427,812	18.5	97.43	416,830	100.00	427,813	18.50
1986	783,128	22.5	95.81	750,338	100.00	783,129	22.50
1985	59,889,883	23.5	95.31	57,079,850	100.00	59,889,884	23.50
1984	177,806	24.5	94.76	168,485	100.00	177,807	24.50
1982	273,723	26.5	93.51	255,964	100.00	273,724	26.50
1978	81,431	30.5	90.35	73,572	100.00	81,432	30.50
1977	28,623	31.5	89.40	25,589	100.00	28,624	31.50
1976	158,516	32.5	88.38	140,096	100.00	158,517	32.50
1975	72,763	33.5	87.29	63,511	100.00	72,764	33.50
1974	20,383	34.5	86.11	17,552	100.00	20,384	34.50
1973	112,943	35.5	84.85	95,834	100.00	112,944	35.50
1972	8,467,428	36.5	83.51	7,070,810	100.00	8,467,429	36.50
1971	26,158	37.5	82.07	21,467	100.00	26,159	37.50
1970	4,036,456	38.5	80.53	3,250,477	100.00	4,036,457	38.50
1968	768,389	40.5	77.14	592,728	99.70	766,108	40.44
1967	370,618	41.5	75.28	278,998	97.30	360,608	40.94
1966	19,067	42.5	73.30	13,977	94.75	18,066	41.38
1965	450,199	43.5	71.21	320,582	92.04	414,357	41.77
1964	97,303	44.5	69.00	67,134	89.18	86,772	42.09
1963	681,030	45.5	66.66	453,975	86.16	586,767	42.35
1962	115,749	46.5	64.21	74,317	82.99	96,055	42.54
1961	227	47.5	61.64	140	79.88	181	42.72
1959	376,337	49.5	56.17	211,385	72.60	273,216	42.72
1958	9,324	50.5	53.29	4,969	68.89	6,423	42.64
1956	8,760	52.5	47.32	4,145	61.16	5,358	42.31
1954	65,848	54.5	41.16	27,106	53.20	35,034	41.75
1944	1,370	64.5	13.92	191	18.03	247	38.07
1942	184,841	66.5	10.20	18,850	13.18	24,363	37.63
1940	2,636	68.5	7.17	189	9.28	245	37.43
1939	848	69.5	5.91	50	7.68	65	37.42

Computed Age Distribution Report

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Account: KEPCo 101/6 354 - KY
 Version: KEPCO TRANSMISSION 2008
 Dispersion: 50 - R3

Vintage	Additions	Age 2009	Theoretical Survivors		Computed Survivors		Realized Life
			Percent	Amount	Percent	Amount	
1938	7,093	70.5	4.80	340	6.19	439	37.43
1936	462	72.5	3.01	14	3.97	18	37.69
1933	45	75.5	1.24	1	2.69	1	38.77
1932	539	76.5	0.86	5	1.18	6	38.70
1930	2,645	78.5	0.35	9	0.45	12	39.43
1929	18,866	79.5	0.19	36	0.24	46	39.85
1928	5,349	80.5	0.09	5	0.12	6	40.30
1927	722	81.5	0.04		0.04		40.77
95,236,401				88,880,032		94,722,544 *	

* Recorded Balance January 1, 2009: 94,722,544

Computed Age Distribution Report

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Account: KEPCo 101/6 355 - KY
 Version: KEPCO TRANSMISSION 2008
 Dispersion: 38 - S4

Age	Additions	Age 2009	Theoretical Survivors		Computed Survivors		Realized Life
			Percent	Amount	Percent	Amount	
2008	7,821,842	0.5	100.00	7,821,842	100.00	7,821,843	0.50
2007	547,335	1.5	100.00	547,335	100.00	547,336	1.50
2006	1,905,268	2.5	100.00	1,905,268	100.00	1,905,269	2.50
2005	1,400,726	3.5	100.00	1,400,726	100.00	1,400,727	3.50
2004	1,450,693	4.5	100.00	1,450,693	100.00	1,450,694	4.50
2003	725,787	5.5	100.00	725,787	100.00	725,788	5.50
2002	1,374,086	6.5	100.00	1,374,086	100.00	1,374,087	6.50
2001	3,034,077	7.5	100.00	3,034,077	100.00	3,034,078	7.50
2000	2,016,920	8.5	100.00	2,016,920	100.00	2,016,921	8.50
1999	7,276,249	9.5	100.00	7,276,249	100.00	7,276,250	9.50
1998	246,197	10.5	100.00	246,197	100.00	246,198	10.50
1997	2,200,205	11.5	100.00	2,200,205	100.00	2,200,206	11.50
1996	966,626	12.5	100.00	966,626	100.00	966,627	12.50
1995	502,094	13.5	100.00	502,089	100.00	502,095	13.50
1994	2,853,694	14.5	100.00	2,853,604	100.00	2,853,695	14.50
1993	2,024,333	15.5	99.99	2,024,180	100.00	2,024,334	15.50
1992	1,980,376	16.5	99.98	1,980,029	100.00	1,980,377	16.50
1991	1,225,759	17.5	99.96	1,225,285	100.00	1,225,760	17.50
1990	379,655	18.5	99.92	379,352	100.00	379,656	18.50
1989	526,772	19.5	99.85	525,968	100.00	526,773	19.50
1988	501,637	20.5	99.72	500,257	100.00	501,638	20.50
1987	208,776	21.5	99.52	207,780	100.00	208,777	21.50
1986	743,795	22.5	99.21	737,944	100.00	743,796	22.50
1985	286,320	23.5	98.75	282,748	99.69	285,437	23.46
1984	129,011	24.5	98.09	126,546	99.02	127,749	24.38
1983	472,313	25.5	97.18	458,978	98.10	463,342	25.26
1982	1,190,639	26.5	95.95	1,142,372	96.86	1,153,232	26.08
1981	831,647	27.5	94.35	784,623	95.24	792,082	26.85
1980	971,066	28.5	92.33	896,576	93.21	905,099	27.53
1979	163,523	29.5	89.82	146,883	90.68	148,280	28.13
1978	400,964	30.5	86.82	348,129	87.55	351,438	28.62
1977	372,517	31.5	83.30	310,308	84.09	313,258	28.99
1976	465,134	32.5	79.25	368,619	80.00	372,123	29.25
1975	413,881	33.5	74.72	309,237	75.43	312,177	29.38
1974	343,018	34.5	69.73	239,201	70.40	241,475	29.39
1973	125,643	35.5	64.38	80,887	64.99	81,656	29.29
1972	154,289	36.5	58.75	90,640	59.31	91,501	29.07
1971	241,075	37.5	52.93	127,612	53.44	128,825	28.77
1970	5,279	38.5	47.07	2,485	47.52	2,509	28.40
1969	331,594	39.5	41.25	136,794	41.65	138,094	27.98
1968	245,350	40.5	35.62	87,397	35.96	88,228	27.53
67	434,577	41.5	30.27	131,528	30.55	132,778	27.09
1966	672,143	42.5	25.28	169,942	25.52	171,556	26.67
1965	586,942	43.5	20.75	121,790	20.95	122,947	26.31
1964	116,699	44.5	16.70	19,488	16.86	19,674	26.00

Computed Age Distribution Report

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Account: KEPCo 101/6 355 - KY
 Version: KEPCO TRANSMISSION 2008
 Dispersion: 3B - S4

Age	Additions	Age 2009	Theoretical Survivors		Computed Survivors		Realized Life
			Percent	Amount	Percent	Amount	
1963	40,074	45.5	13.18	5,291	13.30	5,331	25.78
1962	83,740	46.5	10.18	8,521	10.27	8,602	25.64
1961	53,310	47.5	7.67	4,089	7.74	4,128	25.59
1960	80,558	48.5	5.65	4,555	5.71	4,598	25.63
1959	72,588	49.5	4.05	2,942	4.09	2,970	25.76
1958	31,500	50.5	2.82	889	2.85	898	25.97
1957	12,111	51.5	1.91	231	1.93	234	26.25
1956	52,890	52.5	1.25	660	1.25	666	26.58
1955	11,248	53.5	0.79	88	0.80	90	26.96
1954	159,581	54.5	0.48	761	0.48	767	27.38
1953	59,562	55.5	0.28	164	0.28	165	27.83
1952	9,028	56.5	0.15	14	0.16	14	28.29
1951	4,317	57.5	0.08	3	0.08	4	28.77
1950	2,849	58.5	0.04	1	0.05	1	29.26
1949	16,466	59.5	0.02	3	0.01	2	29.75
1948	2,881	60.5	0.01		0.01		30.25
1947	802	61.5	0.00		0.02		30.76
1946	1,398	62.5	0.00		-0.02	()	31.25
1945	11,785	63.5	0.00		-0.00	(1)	31.75
1944	76,227	64.5	0.00		0.00		0.00
1942	164,194	66.5	0.00		0.00		0.00
1941	2,006	67.5	0.00		0.00		0.00
1938	113,662	70.5	0.00		0.00		0.00
51,929,303				48,313,486		48,384,844 *	

* Recorded Balance January 1, 2009: 48,384,844

Computed Age Distribution Report

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Account: KEPCo 101/6 356 - KY
 Version: KEPCO TRANSMISSION 2008
 Dispersion: 50 - R3

Age	Additions	Age 2009	Theoretical Survivors		Computed Survivors		Realized Life
			Percent	Amount	Percent	Amount	
2008	7,615,244	0.5	99.99	7,614,102	100.00	7,615,245	0.50
2007	388,254	1.5	99.95	388,056	100.00	388,255	1.50
2006	278,652	2.5	99.91	278,396	100.00	278,653	2.50
2005	743,702	3.5	99.86	742,661	100.00	743,703	3.50
2004	244,994	4.5	99.80	244,511	100.00	244,995	4.50
2003	653,964	5.5	99.74	652,251	100.00	653,965	5.50
2002	203,909	6.5	99.66	203,220	100.00	203,910	6.50
2001	1,212,537	7.5	99.58	1,207,384	100.00	1,212,538	7.50
2000	1,907,562	8.5	99.48	1,897,547	100.00	1,907,563	8.50
1999	11,988,969	9.5	99.36	11,912,359	100.00	11,988,970	9.50
1998	4,941,737	10.5	99.23	4,903,784	100.00	4,941,738	10.50
1997	712,207	11.5	99.09	705,697	100.00	712,208	11.50
1996	1,377,964	12.5	98.92	1,363,096	100.00	1,377,965	12.50
1995	1,023,703	13.5	98.74	1,010,753	100.00	1,023,704	13.50
1994	3,258,061	14.5	98.53	3,210,070	100.00	3,258,062	14.50
1993	1,695,512	15.5	98.30	1,666,604	100.00	1,695,513	15.50
1992	2,241,118	16.5	98.04	2,197,125	100.00	2,241,119	16.50
1991	704,245	17.5	97.75	688,399	100.00	704,246	17.50
1990	430,845	18.5	97.43	419,785	100.00	430,846	18.50
1989	273,872	19.5	97.08	265,883	100.00	273,873	19.50
1988	187,297	20.5	96.70	181,112	100.00	187,298	20.50
1987	131,020	21.5	96.28	126,141	100.00	131,021	21.50
1986	838,491	22.5	95.81	803,383	100.00	838,492	22.50
1985	46,009,402	23.5	95.31	43,850,641	100.00	46,009,403	23.50
1984	171,899	24.5	94.76	162,888	100.00	171,900	24.50
1983	42,428	25.5	94.16	39,950	100.00	42,429	25.50
1982	1,827,109	26.5	93.51	1,708,566	100.00	1,827,110	26.50
1981	694,030	27.5	92.81	644,129	100.00	694,031	27.50
1980	452,257	28.5	92.05	416,307	100.00	452,258	28.50
1979	91,746	29.5	91.23	83,702	100.00	91,747	29.50
1978	2,009,798	30.5	90.35	1,815,832	100.00	2,009,799	30.50
1977	512,195	31.5	89.40	457,902	100.00	512,196	31.50
1976	229,904	32.5	88.38	203,189	100.00	229,905	32.50
1975	299,105	33.5	87.29	261,074	100.00	299,106	33.50
1974	44,958	34.5	86.11	38,713	100.00	44,959	34.50
1973	72,762	35.5	84.85	61,740	100.00	72,763	35.50
1972	158,182	36.5	83.51	132,091	99.80	157,862	36.46
1971	1,144,131	37.5	82.07	938,943	98.08	1,122,122	37.14
1970	8,258,592	38.5	80.53	6,650,479	96.24	7,947,927	37.78
1969	306,367	39.5	78.89	241,684	94.28	288,835	38.37
1968	1,214,668	40.5	77.14	936,983	92.19	1,119,780	38.92
1967	622,934	41.5	75.28	468,938	89.97	560,424	39.42
1966	235,126	42.5	73.30	172,354	87.60	205,980	39.87
1965	750,174	43.5	71.21	534,191	85.10	638,407	40.26
1964	332,032	44.5	69.00	229,085	82.46	273,778	40.60

Computed Age Distribution Report

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Account: KEPCo 101/6 356 - KY
 Version: KEPCO TRANSMISSION 2008
 Dispersion: 50 - R3

Age	Additions	Age 2009	Theoretical Survivors		Computed Survivors		Realized Life
			Percent	Amount	Percent	Amount	
1963	516,316	45.5	66.66	344,176	79.66	411,322	40.87
1962	116,770	46.5	64.21	74,972	76.73	89,599	41.09
1961	35,760	47.5	61.64	22,041	73.66	26,341	41.24
1960	34,229	48.5	58.95	20,179	70.46	24,116	41.34
1959	203,931	49.5	56.17	114,546	67.13	136,893	41.36
1958	363,538	50.5	53.29	193,737	63.69	231,532	41.33
1957	9,636	51.5	50.34	4,850	60.16	5,797	41.24
1956	41,375	52.5	47.32	19,577	56.55	23,397	41.09
1955	4,298	53.5	44.25	1,902	52.90	2,274	40.90
1954	318,755	54.5	41.16	131,212	49.19	156,809	40.66
1953	63,843	55.5	38.07	24,308	45.50	29,050	40.38
1952	15,004	56.5	35.01	5,252	41.84	6,277	40.07
1951	13,420	57.5	31.98	4,292	38.22	5,130	39.74
1950	4,533	58.5	29.03	1,316	34.70	1,573	39.40
1949	63,340	59.5	26.17	16,576	31.28	19,810	39.05
1948	14,823	60.5	23.42	3,472	28.00	4,150	38.72
1947	11,563	61.5	20.81	2,407	24.88	2,876	38.40
1946	5,928	62.5	18.35	1,088	21.94	1,301	38.11
1945	27,492	63.5	16.05	4,413	19.18	5,274	37.84
1944	5,349	64.5	13.92	745	16.65	891	37.62
1943	5,002	65.5	11.97	599	14.32	716	37.44
1942	378,305	66.5	10.20	38,580	12.19	46,103	37.30
1941	6,577	67.5	8.60	566	10.28	676	37.22
1940	101,822	68.5	7.17	7,302	8.57	8,726	37.19
1939	476	69.5	5.91	28	7.16	34	37.24
1938	129,975	70.5	4.80	6,238	5.73	7,453	37.27
1937	8,842	71.5	3.84	339	4.59	406	37.39
1936	9,973	72.5	3.01	300	3.59	358	37.55
1935	1,327	73.5	2.31	31	2.78	37	37.77
1934	2,159	74.5	1.72	37	2.07	45	38.02
1933	1,642	75.5	1.24	20	1.50	25	38.32
1932	2,108	76.5	0.86	18	1.03	22	38.65
1931	2,112	77.5	0.56	12	0.68	14	39.01
1930	4,553	78.5	0.35	16	0.41	19	39.41
1929	15,583	79.5	0.19	30	0.22	35	39.84
1928	3,395	80.5	0.09	3	0.11	4	40.30
1927	4,792	81.5	0.04	2	0.04	2	40.77
1926	8,394	82.5	0.01	1	0.01	1	41.25
1925	1,862	83.5	0.00		0.00		41.75
1924	369	84.5	0.00		-0.14	(1)	42.19
1923	1,121	85.5	0.00		0.00		0.00
22	1,393	86.5	0.00		0.00		0.00
	111,095,343			103,776,885		109,075,670 *	

* Recorded Balance January 1, 2009: 109,075,670

Computed Age Distribution Report

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Account: KEPCo 101/6 357 - KY
 Version: KEPCO TRANSMISSION 2008
 Dispersion: 37 - R2

Age	Additions	Age 2009	Theoretical Survivors		Computed Survivors		Realized Life
			Percent	Amount	Percent	Amount	
1997	11,590	11.5	95.07	11,019	100.00	11,591	11.50
	11,590			11,019		11,591 *	

* Recorded Balance January 1, 2009: 11,591

Computed Age Distribution Report

Page 114 of 350

Account: KEPCo 101/6 358 - KY
 Version: KEPCO TRANSMISSION 2008
 Dispersion: 44 - R1

Age	Additions	Age 2009	Theoretical Survivors		Computed Survivors		Realized Life
			Percent	Amount	Percent	Amount	
1983	106,066	25.5	78.95	83,738	100.00	106,067	25.50
	106,066			83,738		106,067 *	

* Recorded Balance January 1, 2009: 106,067

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KENTUCKY POWER COMPANY
DEPRECIATION STUDY AS OF 12-31-08
TRANSMISSION PLANT WORKPAPERS

CALCULATED RESERVE

Depreciation Reserve Summary

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Account: KEPCo 101/6 350 Land Rights
 Scenario: KEPCO TRANSMISSION 2008 NEW
 Dispersion: 75 - R4

Age Net Salvage Rate: 0.00%
 Future Net Salvage Rate: 0.00%

Broad Group Procedure

January 1, 2009

	Plant Amt	Depreciation Reserve		Net Plant	
		Amount	Ratio	Amount	Ratio
Recorded	\$23,482,119.13	\$4,193,440.40	0.1786	\$19,288,678.73	0.8214
Computed	\$23,482,119.13	\$6,833,405.81	0.2910	\$16,648,713.32	0.7090
Difference		(\$2,639,965.41)	-0.1124	\$2,639,965.41	0.1124

Generation Arrangement Report

Page 117 of 350

Account: KEPCo 101/6 350 Land Rights

Dispersion: 75.00 - R4

Average Net Salvage Rate: 0.00%

Future Net Salvage Rate: 0.00%

Broad Group Procedure

January 1, 2009

Vintage	Age	Surviving Plant	Avg Life	Remaining Life	Net Plant Ratio	Alloc Factor	Computed Net Plant	Accruaf
2008	0.50	\$7,611.97	75.00	74.50	0.9933	1.0000	\$7,561.27	\$101.49
2007	1.50	\$2,274.15	75.00	73.50	0.9800	1.0000	\$2,228.71	\$30.32
2006	2.50	\$103,998.38	75.00	72.50	0.9667	1.0000	\$100,535.18	\$1,386.65
2005	3.50	\$92,305.72	75.00	71.50	0.9534	1.0000	\$88,003.21	\$1,230.74
2004	4.50	\$33,991.00	75.00	70.51	0.9401	1.0000	\$31,953.84	\$453.21
2003	5.50	(\$9,734.24)	75.00	69.51	0.9268	1.0000	(\$9,021.33)	(\$129.79)
2002	6.50	(\$200,238.00)	75.00	68.51	0.9135	1.0000	(\$182,908.75)	(\$2,669.84)
2001	7.50	\$480,775.90	75.00	67.51	0.9002	1.0000	\$432,775.09	\$6,410.35
2000	8.50	\$321,568.93	75.00	66.51	0.8869	1.0000	\$285,188.25	\$4,287.59
1999	9.50	\$966,674.32	75.00	65.52	0.8736	1.0000	\$844,471.77	\$12,888.99
1998	10.50	\$1,280,236.00	75.00	64.52	0.8603	1.0000	\$1,101,398.63	\$17,069.81
1997	11.50	\$580,453.00	75.00	63.53	0.8470	1.0000	\$491,664.30	\$7,739.37
1996	12.50	\$126,373.00	75.00	62.53	0.8338	1.0000	\$105,366.30	\$1,684.97
1995	13.50	\$339,788.00	75.00	61.54	0.8205	1.0000	\$278,805.29	\$4,530.51
1994	14.50	\$321,828.00	75.00	60.55	0.8073	1.0000	\$259,809.91	\$4,291.04
1993	15.50	\$316,776.00	75.00	59.56	0.7941	1.0000	\$251,545.01	\$4,223.68
1992	16.50	\$75,805.00	75.00	58.57	0.7809	1.0000	\$59,193.95	\$1,010.73
1991	17.50	\$325,286.00	75.00	57.58	0.7677	1.0000	\$249,718.09	\$4,337.15
1990	18.50	\$104,145.00	75.00	56.59	0.7545	1.0000	\$78,578.91	\$1,388.60
1989	19.50	\$15,874.00	75.00	55.60	0.7414	1.0000	\$11,768.68	\$211.65
1988	20.50	\$3,265.00	75.00	54.62	0.7283	1.0000	\$2,377.77	\$43.53
1987	21.50	\$1,327.00	75.00	53.64	0.7152	1.0000	\$949.02	\$17.69
1986	22.50	\$82,584.00	75.00	52.66	0.7021	1.0000	\$57,983.06	\$1,101.12
1985	23.50	\$12,474,189.00	75.00	51.68	0.6891	1.0000	\$8,595,731.04	\$166,322.52
1984	24.50	\$294,262.00	75.00	50.71	0.6761	1.0000	\$198,943.70	\$3,923.49
1983	25.50	\$502,031.00	75.00	49.73	0.6631	1.0000	\$332,911.24	\$6,693.75
1982	26.50	\$148,856.00	75.00	48.77	0.6502	1.0000	\$96,789.13	\$1,984.75
1981	27.50	\$154,641.00	75.00	47.80	0.6373	1.0000	\$98,558.83	\$2,061.88
1980	28.50	\$259,692.00	75.00	46.84	0.6245	1.0000	\$162,185.69	\$3,462.56
1979	29.50	\$4,236,751.00	75.00	45.88	0.6118	1.0000	\$2,591,909.23	\$56,490.01
1975	33.50	\$38,729.00	75.00	42.10	0.5613	1.0000	\$21,738.31	\$516.39
		\$23,482,119.13	75.00	53.17	0.7090	1.0000	\$16,648,713.32	\$313,094.92

Depreciation Reserve Summary

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Account: KEPCo 101/6 352 - KY
 Scenario: KEPCO TRANSMISSION 2008 NEW
 Dispersion: 73 - L2
 Average Net Salvage Rate: 10.00%
 Future Net Salvage Rate: 10.00%

Broad Group Procedure

January 1, 2009

	Plant Amt	Depreciation Reserve		Net Plant	
		Amount	Ratio	Amount	Ratio
Recorded	\$6,369,901.06	\$1,008,870.00	0.1584	\$4,724,040.95	0.7416
Computed	\$6,369,901.06	\$1,644,000.50	0.2581	\$4,088,910.45	0.6419
Difference		(\$635,130.50)	-0.0997	\$635,130.50	0.0997

Generation Arrangement Report

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Account: KEPCo 101/6 352 - KY
 Dispersion: 73.00 - 1.2
 Average Net Salvage Rate: 10.00%
 Future Net Salvage Rate: 10.00%

Broad Group Procedure
 January 1, 2009

Vintage	Age	Surviving Plant	Avg Life	Remaining Life	Net Plant Ratio	Alloc Factor	Computed Net Plant	Accrual
2008	0.50	\$141,133.32	73.00	72.50	0.0938	1.0000	\$126,149.59	\$1,740.00
2007	1.50	\$7,094.25	73.00	71.50	0.8815	1.0000	\$6,253.70	\$87.46
2005	3.50	\$66,214.95	73.00	69.51	0.8570	1.0000	\$56,742.99	\$816.35
2002	6.50	\$806,045.35	73.00	66.55	0.8205	1.0000	\$661,376.97	\$9,937.55
2001	7.50	\$701.17	73.00	65.58	0.8085	1.0000	\$566.92	\$8.64
2000	8.50	\$84,281.38	73.00	64.61	0.7966	1.0000	\$67,138.29	\$1,039.09
1999	9.50	\$16,180.15	73.00	63.66	0.7848	1.0000	\$12,698.02	\$199.48
1998	10.50	\$58,660.00	73.00	62.70	0.7731	1.0000	\$45,348.49	\$723.21
1997	11.50	\$203,592.01	73.00	61.76	0.7614	1.0000	\$155,021.64	\$2,510.04
1996	12.50	\$122,344.15	73.00	60.83	0.7499	1.0000	\$91,749.93	\$1,508.35
1995	13.50	\$115,575.00	73.00	59.90	0.7385	1.0000	\$85,355.56	\$1,424.90
1994	14.50	\$49,187.00	73.00	58.99	0.7272	1.0000	\$35,770.12	\$606.42
1993	15.50	\$371,115.00	73.00	58.08	0.7161	1.0000	\$265,737.61	\$4,575.39
1992	16.50	\$113,918.00	73.00	57.18	0.7050	1.0000	\$80,307.64	\$1,404.47
1991	17.50	\$45,070.00	73.00	56.29	0.6940	1.0000	\$31,279.31	\$555.66
1990	18.50	\$65,795.00	73.00	55.41	0.6832	1.0000	\$44,950.13	\$811.17
1989	19.50	\$1,510.00	73.00	54.54	0.6724	1.0000	\$1,015.37	\$18.62
1988	20.50	\$5,196.00	73.00	53.68	0.6618	1.0000	\$3,438.87	\$64.06
1987	21.50	\$14,460.00	73.00	52.83	0.6513	1.0000	\$9,418.20	\$178.27
1986	22.50	\$156,377.00	73.00	51.99	0.6409	1.0000	\$100,224.41	\$1,927.94
1985	23.50	\$101,850.00	73.00	51.15	0.6306	1.0000	\$64,230.05	\$1,255.68
1984	24.50	\$115,579.00	73.00	50.32	0.6204	1.0000	\$71,708.29	\$1,424.95
1983	25.50	\$52,326.00	73.00	49.51	0.6104	1.0000	\$31,939.06	\$645.12
1982	26.50	\$194,550.00	73.00	48.71	0.6005	1.0000	\$116,824.01	\$2,398.56
1981	27.50	\$1,642,115.00	73.00	47.91	0.5907	1.0000	\$969,982.75	\$20,245.25
1980	28.50	\$102,817.00	73.00	47.14	0.5811	1.0000	\$59,750.53	\$1,267.61
1979	29.50	\$3,140.00	73.00	46.38	0.5718	1.0000	\$1,795.33	\$38.71
1978	30.50	\$125.00	73.00	45.63	0.5625	1.0000	\$70.32	\$1.54
1977	31.50	\$158,624.39	73.00	44.90	0.5536	1.0000	\$87,816.70	\$1,955.64
1976	32.50	\$87,539.00	73.00	44.19	0.5448	1.0000	\$47,693.67	\$1,079.25
1975	33.50	\$11,010.17	73.00	43.51	0.5364	1.0000	\$5,905.65	\$135.74
1974	34.50	\$1,154,345.00	73.00	42.84	0.5282	1.0000	\$609,685.70	\$14,231.65
1973	35.50	\$46,882.77	73.00	42.19	0.5201	1.0000	\$24,384.77	\$578.01

Generation Arrangement Report

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Account: KEPCo 101/6 352 - KY
 Dispersion: 73.00 - L2

Age Net Salvage Rate: 10.00%
 Future Net Salvage Rate: 10.00%

Broad Group Procedure
 January 1, 2009

Vintage	Age	Surviving Plant	Avg Life	Remaining Life	Net Plant Ratio	Alloc Factor	Computed Net Plant	Accrual
1971	37.50	\$11,105.00	73.00	40.96	0.5050	1.0000	\$5,607.58	\$136.91
1970	38.50	\$50,620.00	73.00	40.37	0.4977	1.0000	\$25,192.98	\$624.08
1969	39.50	\$1,252.00	73.00	39.80	0.4907	1.0000	\$614.40	\$15.44
1968	40.50	\$32,049.00	73.00	39.26	0.4840	1.0000	\$15,511.89	\$395.12
1967	41.50	\$21,588.91	73.00	38.73	0.4775	1.0000	\$10,308.25	\$266.16
1966	42.50	\$29,924.00	73.00	38.22	0.4712	1.0000	\$14,101.16	\$368.93
1965	43.50	\$297.00	73.00	37.73	0.4652	1.0000	\$138.15	\$3.66
1964	44.50	\$8,446.00	73.00	37.26	0.4594	1.0000	\$3,879.79	\$104.13
1963	45.50	\$16,589.00	73.00	36.81	0.4538	1.0000	\$7,527.58	\$204.52
1962	46.50	\$6,972.00	73.00	36.37	0.4483	1.0000	\$3,125.82	\$85.96
1961	47.50	\$121.00	73.00	35.94	0.4432	1.0000	\$53.62	\$1.49
1960	48.50	\$2,917.00	73.00	35.54	0.4381	1.0000	\$1,278.04	\$35.96
1959	49.50	\$1,799.00	73.00	35.14	0.4333	1.0000	\$779.47	\$22.18
1958	50.50	\$4,414.00	73.00	34.77	0.4286	1.0000	\$1,891.88	\$54.42
1957	51.50	\$579.00	73.00	34.40	0.4241	1.0000	\$245.54	\$7.14
1956	52.50	\$381.00	73.00	34.04	0.4197	1.0000	\$159.92	\$4.70
1955	53.50	\$516.00	73.00	33.70	0.4155	1.0000	\$214.40	\$6.36
1954	54.50	\$38,794.00	73.00	33.37	0.4114	1.0000	\$15,960.63	\$478.28
1953	55.50	\$711.00	73.00	33.05	0.4075	1.0000	\$289.70	\$8.77
1952	56.50	\$92.00	73.00	32.74	0.4036	1.0000	\$37.13	\$1.13
1951	57.50	\$8,401.00	73.00	32.43	0.3999	1.0000	\$3,359.34	\$103.57
1946	62.50	\$152.00	73.00	31.03	0.3825	1.0000	\$58.15	\$1.87
1944	64.50	\$2,137.00	73.00	30.50	0.3761	1.0000	\$803.63	\$26.35
1943	65.50	\$5,740.89	73.00	30.25	0.3729	1.0000	\$2,140.60	\$70.77
1942	66.50	\$7,335.00	73.00	29.99	0.3698	1.0000	\$2,712.49	\$90.43
1940	68.50	\$1,616.00	73.00	29.50	0.3637	1.0000	\$587.72	\$19.92
		\$6,369,901.06	73.00	52.07	0.6419	1.0000	\$4,088,910.45	\$78,533.03

Depreciation Reserve Summary

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Account: KEPCo 101/6 353 - KY
 Scenario: KEPCO TRANSMISSION 2008 NEW
 Dispersion: 42 - R2
 Average Net Salvage Rate: -5.00%
 Future Net Salvage Rate: -5.00%

Broad Group Procedure

January 1, 2009

	Plant Amt	Depreciation Reserve		Net Plant	
		Amount	Ratio	Amount	Ratio
Recorded	\$146,458,490.21	\$25,983,249.06	0.1774	\$127,798,165.66	0.8726
Computed	\$146,458,490.21	\$42,340,910.64	0.2891	\$111,440,504.08	0.7609
Difference		(\$16,357,661.58)	-0.1117	\$16,357,661.58	0.1117

Generation Arrangement Report

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Account: KEPCo 101/6 353 - KY

Dispersion: 42.00 - R2

Average Net Salvage Rate: -5.00%

Future Net Salvage Rate: -5.00%

Broad Group Procedure

January 1, 2009

Vintage	Age	Surviving Plant	Avg Life	Remaining Life	Net Plant Ratio	Alloc Factor	Computed Net Plant	Accrual
2008	0.50	\$12,624,818.01	42.00	41.55	1.0387	1.0000	\$13,113,243.81	\$315,620.45
2007	1.50	\$1,708,499.05	42.00	40.65	1.0161	1.0000	\$1,736,082.91	\$42,712.48
2006	2.50	\$10,134,361.85	42.00	39.75	0.9938	1.0000	\$10,071,455.97	\$253,359.05
2005	3.50	\$2,121,353.20	42.00	38.86	0.9716	1.0000	\$2,061,072.13	\$53,033.83
2004	4.50	\$2,898,108.13	42.00	37.98	0.9495	1.0000	\$2,751,820.68	\$72,452.70
2003	5.50	\$3,593,864.20	42.00	37.11	0.9277	1.0000	\$3,333,850.25	\$89,846.61
2002	6.50	\$3,657,236.98	42.00	36.24	0.9059	1.0000	\$3,313,266.14	\$91,430.92
2001	7.50	\$3,023,907.36	42.00	35.38	0.8844	1.0000	\$2,674,367.88	\$75,597.68
2000	8.50	\$2,475,078.16	42.00	34.52	0.8631	1.0000	\$2,136,165.10	\$61,876.95
1999	9.50	\$1,485,510.96	42.00	33.68	0.8419	1.0000	\$1,250,648.56	\$37,137.77
1998	10.50	\$11,131,808.18	42.00	32.84	0.8209	1.0000	\$9,138,580.73	\$278,295.20
1997	11.50	\$36,704,773.77	42.00	32.01	0.8002	1.0000	\$29,370,648.11	\$917,619.34
1996	12.50	\$2,459,852.44	42.00	31.18	0.7796	1.0000	\$1,917,729.27	\$61,496.31
1995	13.50	\$843,447.04	42.00	30.37	0.7593	1.0000	\$640,402.43	\$21,086.18
1994	14.50	\$2,295,811.37	42.00	29.56	0.7391	1.0000	\$1,696,827.34	\$57,395.28
1993	15.50	\$5,624,959.11	42.00	28.77	0.7192	1.0000	\$4,045,453.03	\$140,623.98
1992	16.50	\$2,112,501.16	42.00	27.98	0.6995	1.0000	\$1,477,703.46	\$52,812.53
1991	17.50	\$3,780,305.33	42.00	27.20	0.6800	1.0000	\$2,570,663.40	\$94,507.63
1990	18.50	\$2,980,615.61	42.00	26.43	0.6608	1.0000	\$1,969,555.23	\$74,515.39
1989	19.50	\$1,181,931.52	42.00	25.67	0.6418	1.0000	\$758,563.92	\$29,548.29
1988	20.50	\$525,646.57	42.00	24.92	0.6230	1.0000	\$327,492.99	\$13,141.16
1987	21.50	\$2,020,844.62	42.00	24.18	0.6045	1.0000	\$1,221,689.24	\$50,521.12
1986	22.50	\$499,860.00	42.00	23.45	0.5863	1.0000	\$293,051.21	\$12,496.50
1985	23.50	\$742,291.92	42.00	22.73	0.5683	1.0000	\$421,849.16	\$18,557.30
1984	24.50	\$1,222,337.00	42.00	22.02	0.5506	1.0000	\$673,019.96	\$30,558.43
1983	25.50	\$1,385,202.40	42.00	21.33	0.5331	1.0000	\$738,505.73	\$34,630.06
1982	26.50	\$1,592,738.03	42.00	20.64	0.5160	1.0000	\$821,850.07	\$39,818.45
1981	27.50	\$7,233,381.02	42.00	19.97	0.4991	1.0000	\$3,510,417.34	\$180,834.53
1980	28.50	\$5,281,891.86	42.00	19.30	0.4825	1.0000	\$2,548,706.77	\$132,047.30
1979	29.50	\$935,672.30	42.00	18.65	0.4663	1.0000	\$436,279.26	\$23,391.81
1978	30.50	\$54,420.79	42.00	18.01	0.4503	1.0000	\$24,504.32	\$1,360.52
1977	31.50	\$1,990,423.13	42.00	17.39	0.4346	1.0000	\$865,124.87	\$49,760.58
1976	32.50	\$1,091,429.44	42.00	16.77	0.4193	1.0000	\$457,653.68	\$27,285.74

Generation Arrangement Report

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Account: KEPCo 101/G 353 - KY

Dispersion: 42.00 - R2

Average Net Salvage Rate: -5.00%

Future Net Salvage Rate: -5.00%

Broad Group Procedure

January 1, 2009

Vintage	Age	Surviving Plant	Avg Life	Remaining Life	Net Plant Ratio	Alloc Factor	Computed Net Plant	Accrual
1975	33.50	\$763,727.00	42.00	16.17	0.4043	1.0000	\$308,764.37	\$19,093.18
1974	34.50	\$1,028,842.75	42.00	15.58	0.3896	1.0000	\$400,856.74	\$25,721.07
1973	35.50	\$161,311.71	42.00	15.01	0.3752	1.0000	\$60,531.72	\$4,032.79
1972	36.50	\$168,786.08	42.00	14.45	0.3613	1.0000	\$60,977.02	\$4,219.65
1971	37.50	\$201,316.42	42.00	13.91	0.3476	1.0000	\$69,983.09	\$5,032.91
1970	38.50	\$690,132.75	42.00	13.37	0.3343	1.0000	\$230,713.43	\$17,253.32
1969	39.50	\$4,737,867.36	42.00	12.85	0.3214	1.0000	\$1,522,583.50	\$118,446.68
1968	40.50	\$59,424.00	42.00	12.35	0.3088	1.0000	\$18,348.59	\$1,485.60
1967	41.50	\$238,924.47	42.00	11.86	0.2965	1.0000	\$70,845.91	\$5,973.11
1966	42.50	\$5,843.00	42.00	11.39	0.2846	1.0000	\$1,663.18	\$146.08
1965	43.50	\$96,195.62	42.00	10.92	0.2731	1.0000	\$26,270.94	\$2,404.89
1964	44.50	\$2,344.26	42.00	10.48	0.2619	1.0000	\$614.02	\$58.61
1963	45.50	\$560,961.00	42.00	10.04	0.2511	1.0000	\$140,856.61	\$14,024.03
1962	46.50	\$5,906.00	42.00	9.62	0.2406	1.0000	\$1,421.00	\$147.65
1961	47.50	\$347.00	42.00	9.22	0.2304	1.0000	\$79.96	\$8.68
1960	48.50	\$25,383.97	42.00	8.82	0.2206	1.0000	\$5,599.99	\$634.60
1959	49.50	\$52,367.55	42.00	8.44	0.2111	1.0000	\$11,054.41	\$1,309.19
1958	50.50	\$577.00	42.00	8.07	0.2019	1.0000	\$116.48	\$14.43
1957	51.50	\$8,980.51	42.00	7.72	0.1930	1.0000	\$1,732.85	\$224.51
1955	53.50	\$897.00	42.00	7.03	0.1758	1.0000	\$157.73	\$22.42
1954	54.50	\$225,897.25	42.00	6.71	0.1677	1.0000	\$37,878.20	\$5,647.43
1953	55.50	\$7,575.00	42.00	6.39	0.1597	1.0000	\$1,209.41	\$189.38
		\$146,458,490.21	42.00	30.44	0.7609	1.0000	\$111,440,504.09	\$3,661,462.26

Depreciation Reserve Summary

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Account: KEPCo 101/6 354 - KY
 Scenario: KEPCO TRANSMISSION 2008 NEW
 Dispersion: 50 - R3
 Current Net Salvage Rate: -65.00%
 Future Net Salvage Rate: -65.00%

Broad Group Procedure

January 1, 2009

	Plant Amt	Depreciation Reserve		Net Plant	
		Amount	Ratio	Amount	Ratio
Recorded	\$94,722,543.90	\$40,691,154.00	0.4296	\$115,601,043.44	1.2204
Computed	\$94,722,543.90	\$66,308,124.56	0.7000	\$89,984,072.88	0.9500
Difference		(\$25,616,970.56)	-0.2704	\$25,616,970.56	0.2704

Generation Arrangement Report

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Account: KEPCo 101/6 354 - KY
 Dispersion: 50.00 - R3
 Average Net Salvage Rate: -65.00%
 Mature Net Salvage Rate: -65.00%

Broad Group Procedure

January 1, 2009

Vintage	Age	Surviving Plant	Avg Life	Remaining Life	Net Plant Ratio	Alloc Factor	Computed Net Plant	Accrual
2008	0.50	\$2,400,231.50	50.00	49.51	1.6337	1.0000	\$3,921,369.33	\$79,207.64
2005	3.50	\$16,025.50	50.00	46.57	1.5367	1.0000	\$24,626.79	\$528.84
2004	4.50	\$5,437.50	50.00	45.59	1.5046	1.0000	\$8,181.23	\$179.44
2003	5.50	\$27,462.50	50.00	44.62	1.4726	1.0000	\$40,440.27	\$906.26
2002	6.50	\$96,142.50	50.00	43.66	1.4407	1.0000	\$138,509.98	\$3,172.70
2001	7.50	\$994,593.50	50.00	42.69	1.4089	1.0000	\$1,401,300.82	\$32,821.59
2000	8.50	\$657,177.50	50.00	41.74	1.3773	1.0000	\$905,142.34	\$21,686.86
1999	9.50	\$4,771,185.50	50.00	40.78	1.3459	1.0000	\$6,421,439.40	\$157,449.12
1998	10.50	\$6,759,531.50	50.00	39.84	1.3146	1.0000	\$8,886,130.04	\$223,064.54
1997	11.50	\$860,276.50	50.00	38.89	1.2835	1.0000	\$1,104,182.18	\$28,389.12
1996	12.50	\$363,575.50	50.00	37.96	1.2526	1.0000	\$455,426.85	\$11,997.99
1995	13.50	\$315,635.50	50.00	37.03	1.2220	1.0000	\$385,694.64	\$10,415.97
1993	15.50	\$182,665.50	50.00	35.19	1.1613	1.0000	\$212,125.85	\$6,027.96
1992	16.50	\$41,132.50	50.00	34.28	1.1313	1.0000	\$46,532.91	\$1,357.37
1991	17.50	\$15.50	50.00	33.38	1.1016	1.0000	\$17.07	\$0.51
1990	18.50	\$427,812.50	50.00	32.49	1.0721	1.0000	\$458,656.22	\$14,117.81
1986	22.50	\$783,128.50	50.00	29.00	0.9570	1.0000	\$749,487.35	\$25,843.24
1985	23.50	\$59,889,883.50	50.00	28.15	0.9290	1.0000	\$55,639,270.15	\$1,976,366.16
1984	24.50	\$177,806.50	50.00	27.31	0.9013	1.0000	\$160,261.04	\$5,867.61
1982	26.50	\$273,723.50	50.00	25.66	0.8469	1.0000	\$231,812.01	\$9,032.88
1978	30.50	\$81,431.50	50.00	22.49	0.7421	1.0000	\$60,431.26	\$2,687.24
1977	31.50	\$28,623.50	50.00	21.72	0.7168	1.0000	\$20,517.72	\$944.58
1976	32.50	\$158,516.50	50.00	20.97	0.6919	1.0000	\$109,676.99	\$5,231.04
1975	33.50	\$72,763.50	50.00	20.22	0.6674	1.0000	\$48,560.12	\$2,401.20
1974	34.50	\$20,383.50	50.00	19.49	0.6433	1.0000	\$13,111.70	\$672.66
1973	35.50	\$112,943.50	50.00	18.77	0.6195	1.0000	\$69,973.32	\$3,727.14
1972	36.50	\$8,467,428.50	50.00	18.07	0.5963	1.0000	\$5,048,813.32	\$279,425.14
1971	37.50	\$26,158.50	50.00	17.38	0.5734	1.0000	\$15,000.22	\$863.23
1970	38.50	\$4,036,456.50	50.00	16.70	0.5511	1.0000	\$2,224,381.30	\$133,203.06
1968	40.50	\$766,108.49	50.00	15.39	0.5078	1.0000	\$389,038.11	\$25,281.58
1967	41.50	\$360,608.27	50.00	14.76	0.4870	1.0000	\$175,598.22	\$11,900.07
1966	42.50	\$18,065.53	50.00	14.14	0.4666	1.0000	\$8,429.95	\$596.16
1965	43.50	\$414,356.72	50.00	13.54	0.4469	1.0000	\$185,162.99	\$13,673.77

Generation Arrangement Report

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Account: KEPCo 101/6 354 - KY
 Dispersion: 50.00 - R3
 Average Net Salvage Rate: -65.00%
 Future Net Salvage Rate: -65.00%

Broad Group Procedure

January 1, 2009

Vintage	Age	Surviving Plant	Avg Life	Remaining Life	Net Plant Ratio	Alloc Factor	Computed Net Plant	Accrual
1964	44.50	\$86,772.20	50.00	12.96	0.4277	1.0000	\$37,110.63	\$2,863.48
1963	45.50	\$586,767.39	50.00	12.40	0.4091	1.0000	\$240,035.82	\$19,363.32
1962	46.50	\$96,055.43	50.00	11.85	0.3911	1.0000	\$37,566.59	\$3,169.83
1961	47.50	\$181.34	50.00	11.32	0.3737	1.0000	\$67.77	\$5.98
1959	49.50	\$273,216.36	50.00	10.33	0.3408	1.0000	\$93,122.56	\$9,016.14
1958	50.50	\$6,422.84	50.00	9.86	0.3253	1.0000	\$2,089.66	\$211.95
1956	52.50	\$5,357.82	50.00	8.98	0.2962	1.0000	\$1,587.21	\$176.81
1954	54.50	\$35,033.92	50.00	8.17	0.2696	1.0000	\$9,444.46	\$1,156.12
1944	64.50	\$247.05	50.00	5.01	0.1655	1.0000	\$40.89	\$8.15
1942	66.50	\$24,362.82	50.00	4.49	0.1482	1.0000	\$3,610.36	\$803.97
1940	68.50	\$244.68	50.00	3.98	0.1312	1.0000	\$32.10	\$8.07
1939	69.50	\$65.15	50.00	3.72	0.1227	1.0000	\$8.00	\$2.15
1938	70.50	\$439.39	50.00	3.46	0.1143	1.0000	\$50.21	\$14.50
1936	72.50	\$18.32	50.00	2.95	0.0974	1.0000	\$1.78	\$0.60
1933	75.50	\$1.21	50.00	2.19	0.0724	1.0000	\$0.09	\$0.04
1932	76.50	\$6.36	50.00	1.95	0.0642	1.0000	\$0.41	\$0.21
1930	78.50	\$11.96	50.00	1.47	0.0485	1.0000	\$0.58	\$0.39
1929	79.50	\$45.59	50.00	1.24	0.0409	1.0000	\$1.86	\$1.50
1928	80.50	\$6.25	50.00	1.02	0.0336	1.0000	\$0.21	\$0.21
1927	81.50	\$0.31	50.00	0.81	0.0266	1.0000	\$0.01	\$0.01
		\$94,722,543.90	50.00	28.79	0.9500	1.0000	\$89,984,072.88	\$3,125,843.95

Depreciation Reserve Summary

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Account: KEPCo 101/6 355 - KY
 Scenario: KEPCO TRANSMISSION 2008 NEW
 Dispersion: 38 - S4
 Average Net Salvage Rate: -53.00%
 Future Net Salvage Rate: -53.00%

Broad Group Procedure

January 1, 2009

	Plant Amt	Depreciation Reserve		Net Plant	
		Amount	Ratio	Amount	Ratio
Recorded	\$48,384,843.88	\$13,536,317.96	0.2798	\$60,492,493.18	1.2502
Computed	\$48,384,843.88	\$22,058,058.55	0.4559	\$51,970,752.59	1.0741
Difference		(\$8,521,740.59)	-0.1761	\$8,521,740.59	0.1761

Generation Arrangement Report

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Account: KEPCo 101/6 355 - KY
 Dispersion: 38.00 - S4
 Average Net Salvage Rate: -53.00%
 Structure Net Salvage Rate: -53.00%

Broad Group Procedure
 January 1, 2009

Vintage	Age	Surviving Plant	Avg Life	Remaining Life	Net Plant Ratio	Alloc Factor	Computed Net Plant	Accrual
2008	0.50	\$7,821,842.50	38.00	37.50	1.5099	1.0000	\$11,809,952.91	\$314,932.08
2007	1.50	\$547,335.50	38.00	36.50	1.4696	1.0000	\$804,367.13	\$22,037.46
2006	2.50	\$1,905,268.50	38.00	35.50	1.4293	1.0000	\$2,723,280.47	\$76,712.13
2005	3.50	\$1,400,726.50	38.00	34.50	1.3891	1.0000	\$1,945,719.68	\$56,397.67
2004	4.50	\$1,450,693.50	38.00	33.50	1.3488	1.0000	\$1,956,718.29	\$58,409.50
2003	5.50	\$725,787.50	38.00	32.50	1.3086	1.0000	\$949,731.14	\$29,222.50
2002	6.50	\$1,374,086.50	38.00	31.50	1.2683	1.0000	\$1,742,739.43	\$55,325.06
2001	7.50	\$3,034,077.50	38.00	30.50	1.2280	1.0000	\$3,725,926.99	\$122,161.54
2000	8.50	\$2,016,920.50	38.00	29.50	1.1878	1.0000	\$2,395,623.84	\$81,207.59
1999	9.50	\$7,276,249.50	38.00	28.50	1.1475	1.0000	\$8,349,496.24	\$292,964.78
1998	10.50	\$246,197.50	38.00	27.50	1.1072	1.0000	\$272,598.94	\$9,912.69
1997	11.50	\$2,200,205.50	38.00	26.50	1.0670	1.0000	\$2,347,561.35	\$88,587.22
1996	12.50	\$966,626.50	38.00	25.50	1.0267	1.0000	\$992,445.59	\$38,919.44
1995	13.50	\$502,094.50	38.00	24.50	0.9865	1.0000	\$495,292.45	\$20,215.91
1994	14.50	\$2,853,694.50	38.00	23.50	0.9462	1.0000	\$2,700,208.34	\$114,898.75
1993	15.50	\$2,024,333.50	38.00	22.50	0.9060	1.0000	\$1,834,027.45	\$81,506.06
1992	16.50	\$1,980,376.50	38.00	21.50	0.8658	1.0000	\$1,714,644.84	\$79,736.21
1991	17.50	\$1,225,759.50	38.00	20.50	0.8257	1.0000	\$1,012,150.08	\$49,352.95
1990	18.50	\$379,655.50	38.00	19.52	0.7858	1.0000	\$298,329.74	\$15,286.13
1989	19.50	\$526,772.50	38.00	18.53	0.7461	1.0000	\$393,023.36	\$21,209.52
1988	20.50	\$501,637.50	38.00	17.55	0.7067	1.0000	\$354,517.64	\$20,197.51
1987	21.50	\$208,776.50	38.00	16.59	0.6678	1.0000	\$139,421.75	\$8,406.00
1986	22.50	\$743,795.50	38.00	15.64	0.6296	1.0000	\$468,300.66	\$29,947.56
1985	23.50	\$285,436.75	38.00	14.71	0.5922	1.0000	\$169,024.55	\$11,492.58
1984	24.50	\$127,749.47	38.00	13.80	0.5558	1.0000	\$71,002.33	\$5,143.60
1983	25.50	\$463,341.68	38.00	12.93	0.5206	1.0000	\$241,197.64	\$18,655.60
1982	26.50	\$1,153,231.59	38.00	12.09	0.4866	1.0000	\$561,210.07	\$46,432.75
1981	27.50	\$792,082.06	38.00	11.28	0.4544	1.0000	\$359,891.97	\$31,891.73
1980	28.50	\$905,098.61	38.00	10.52	0.4236	1.0000	\$383,384.82	\$36,442.13
1979	29.50	\$148,279.51	38.00	9.80	0.3944	1.0000	\$58,488.54	\$5,970.20
1978	30.50	\$351,438.34	38.00	9.12	0.3672	1.0000	\$129,061.82	\$14,150.02
1977	31.50	\$313,258.24	38.00	8.48	0.3416	1.0000	\$107,015.31	\$12,612.77
1976	32.50	\$372,123.11	38.00	7.89	0.3177	1.0000	\$118,216.15	\$14,982.85

Generation Arrangement Report

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Account: KEPCo 101/6 355 - KY
 Dispersion: 38.00 - S4
 Average Net Salvage Rate: -53.00%
 Future Net Salvage Rate: -53.00%
 Broad Group Procedure
 January 1, 2009

Vintage	Age	Surviving Plant	Avg Life	Remaining Life	Net Plant Ratio	Alloc Factor	Computed Net Plant	Accrual
1975	33.50	\$312,176.72	38.00	7.34	0.2956	1.0000	\$92,280.05	\$12,569.22
1974	34.50	\$241,474.61	38.00	6.83	0.2750	1.0000	\$66,398.82	\$9,722.53
1973	35.50	\$81,656.47	38.00	6.36	0.2560	1.0000	\$20,900.30	\$3,287.75
1972	36.50	\$91,501.36	38.00	5.92	0.2383	1.0000	\$21,804.72	\$3,684.13
1971	37.50	\$128,825.29	38.00	5.51	0.2220	1.0000	\$28,596.66	\$5,186.91
1970	38.50	\$2,508.69	38.00	5.14	0.2069	1.0000	\$519.04	\$101.01
1969	39.50	\$138,094.05	38.00	4.79	0.1930	1.0000	\$26,645.94	\$5,560.10
1968	40.50	\$88,227.81	38.00	4.47	0.1801	1.0000	\$15,891.13	\$3,552.33
1967	41.50	\$132,778.29	38.00	4.17	0.1681	1.0000	\$22,315.13	\$5,346.07
1966	42.50	\$171,556.34	38.00	3.90	0.1570	1.0000	\$26,938.13	\$6,907.40
1965	43.50	\$122,947.01	38.00	3.64	0.1466	1.0000	\$18,024.27	\$4,950.23
1964	44.50	\$19,673.57	38.00	3.40	0.1370	1.0000	\$2,695.56	\$792.12
1963	45.50	\$5,331.06	38.00	3.18	0.1282	1.0000	\$683.56	\$214.65
1962	46.50	\$8,602.44	38.00	2.97	0.1196	1.0000	\$1,029.06	\$346.36
1961	47.50	\$4,128.34	38.00	2.78	0.1119	1.0000	\$461.77	\$166.22
1960	48.50	\$4,597.83	38.00	2.60	0.1048	1.0000	\$481.88	\$185.12
1959	49.50	\$2,970.18	38.00	2.42	0.0975	1.0000	\$289.62	\$119.59
1958	50.50	\$897.89	38.00	2.26	0.0912	1.0000	\$81.85	\$36.15
1957	51.50	\$233.96	38.00	2.12	0.0856	1.0000	\$20.02	\$9.42
1956	52.50	\$665.93	38.00	1.97	0.0792	1.0000	\$52.75	\$26.81
1955	53.50	\$89.69	38.00	1.84	0.0741	1.0000	\$6.65	\$3.61
1954	54.50	\$767.23	38.00	1.70	0.0684	1.0000	\$52.46	\$30.89
1953	55.50	\$165.21	38.00	1.58	0.0635	1.0000	\$10.49	\$6.65
1952	56.50	\$13.99	38.00	1.47	0.0593	1.0000	\$0.83	\$0.56
1951	57.50	\$3.64	38.00	1.34	0.0540	1.0000	\$0.20	\$0.15
1950	58.50	\$1.38	38.00	1.23	0.0495	1.0000	\$0.07	\$0.06
1949	59.50	\$2.38	38.00	1.14	0.0457	1.0000	\$0.11	\$0.10
1948	60.50	\$0.21	38.00	0.98	0.0393	1.0000	\$0.01	\$0.01
1947	61.50	\$0.16	38.00	0.79	0.0319	1.0000	\$0.01	\$0.01
1946	62.50	(\$0.21)	38.00	0.29	0.0117	1.0000	\$0.00	(\$0.01)
1945	63.50	(\$0.50)	38.00	0.00	0.0000	0.0000	\$0.00	\$0.00
		\$48,384,843.88	38.00	26.68	1.0741	1.0000	\$51,970,752.59	\$1,948,126.63

Depreciation Reserve Summary

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Account: KEPCo 101/6 356 - KY
 Scenario: KEPCO TRANSMISSION 2008 NEW
 Dispersion: 50 - R3
 Average Net Salvage Rate: -10.00%
 Future Net Salvage Rate: -10.00%

Broad Group Procedure

January 1, 2009

	Plant Amt	Depreciation Reserve		Net Plant	
		Amount	Ratio	Amount	Ratio
Recorded	\$109,075,670.29	\$27,414,811.52	0.2513	\$92,568,425.80	0.8487
Computed	\$109,075,670.29	\$44,673,708.12	0.4096	\$75,309,529.20	0.6904
Difference		(\$17,258,896.60)	-0.1582	\$17,258,896.60	0.1582

Generation Arrangement Report

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Account: KEPCo 101/6 356 - KY

Dispersion: 50.00 - R3

Average Net Salvage Rate: -10.00%

Future Net Salvage Rate: -10.00%

Broad Group Procedure

January 1, 2009

Vintage	Age	Surviving Plant	Avg Life	Remaining Life	Net Plant Ratio	Alloc Factor	Computed Net Plant	Accrual
2008	0.50	\$7,615,244.50	50.00	49.51	1.0892	1.0000	\$8,294,251.68	\$167,535.38
2007	1.50	\$388,254.50	50.00	48.53	1.0676	1.0000	\$414,482.08	\$8,541.60
2006	2.50	\$278,652.50	50.00	47.54	1.0460	1.0000	\$291,466.65	\$6,130.36
2005	3.50	\$743,702.50	50.00	46.57	1.0245	1.0000	\$761,911.02	\$16,361.46
2004	4.50	\$244,994.50	50.00	45.59	1.0031	1.0000	\$245,744.78	\$5,389.88
2003	5.50	\$653,964.50	50.00	44.62	0.9817	1.0000	\$642,002.82	\$14,387.22
2002	6.50	\$203,909.50	50.00	43.66	0.9604	1.0000	\$195,844.72	\$4,486.01
2001	7.50	\$1,212,537.50	50.00	42.69	0.9393	1.0000	\$1,138,910.72	\$26,675.83
2000	8.50	\$1,907,562.50	50.00	41.74	0.9182	1.0000	\$1,751,546.66	\$41,966.38
1999	9.50	\$11,988,969.50	50.00	40.78	0.8973	1.0000	\$10,757,136.58	\$263,757.33
1998	10.50	\$4,941,737.50	50.00	39.84	0.8764	1.0000	\$4,330,963.08	\$108,718.23
1997	11.50	\$712,207.50	50.00	38.89	0.8557	1.0000	\$609,421.76	\$15,668.57
1996	12.50	\$1,377,964.50	50.00	37.96	0.8351	1.0000	\$1,150,722.99	\$30,315.22
1995	13.50	\$1,023,703.50	50.00	37.03	0.8146	1.0000	\$833,951.29	\$22,521.48
1994	14.50	\$3,258,061.50	50.00	36.11	0.7943	1.0000	\$2,588,002.07	\$71,677.35
1993	15.50	\$1,695,512.50	50.00	35.19	0.7742	1.0000	\$1,312,643.52	\$37,301.28
1992	16.50	\$2,241,118.50	50.00	34.28	0.7542	1.0000	\$1,690,241.08	\$49,304.61
1991	17.50	\$704,245.50	50.00	33.38	0.7344	1.0000	\$517,181.97	\$15,493.40
1990	18.50	\$430,845.50	50.00	32.49	0.7147	1.0000	\$307,938.59	\$9,478.60
1989	19.50	\$273,872.50	50.00	31.60	0.6953	1.0000	\$190,414.78	\$6,025.20
1988	20.50	\$187,297.50	50.00	30.73	0.6760	1.0000	\$126,611.68	\$4,120.55
1987	21.50	\$131,020.50	50.00	29.86	0.6569	1.0000	\$86,068.31	\$2,882.45
1986	22.50	\$838,491.50	50.00	29.00	0.6380	1.0000	\$534,981.40	\$18,446.81
1985	23.50	\$46,009,402.50	50.00	28.15	0.6194	1.0000	\$28,495,959.87	\$1,012,206.86
1984	24.50	\$171,899.50	50.00	27.31	0.6009	1.0000	\$103,291.28	\$3,781.79
1983	25.50	\$42,428.50	50.00	26.48	0.5826	1.0000	\$24,720.04	\$933.43
1982	26.50	\$1,827,109.50	50.00	25.66	0.5646	1.0000	\$1,031,566.37	\$40,196.41
1981	27.50	\$694,030.50	50.00	24.85	0.5468	1.0000	\$379,479.57	\$15,268.67
1980	28.50	\$452,257.50	50.00	24.05	0.5292	1.0000	\$239,332.05	\$9,949.67
1979	29.50	\$91,746.50	50.00	23.27	0.5116	1.0000	\$46,960.09	\$2,018.42
1978	30.50	\$2,009,798.50	50.00	22.49	0.4947	1.0000	\$994,329.66	\$44,215.57
1977	31.50	\$512,195.50	50.00	21.72	0.4779	1.0000	\$244,765.93	\$11,268.30
1976	32.50	\$229,904.50	50.00	20.97	0.4613	1.0000	\$106,046.72	\$5,057.90

Generation Arrangement Report

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Account: KEPCo 101/6 356 - KY
 Dispersion: 50.00 - R3
 Average Net Salvage Rate: -10.00%
 Mature Net Salvage Rate: -10.00%

Broad Group Procedure
 January 1, 2009

Vintage	Age	Surviving Plant	Avg Life	Remaining Life	Net Plant Ratio	Alloc Factor	Computed Net Plant	Accrual
1975	33.50	\$299,105.50	50.00	20.22	0.4449	1.0000	\$133,075.88	\$6,580.32
1974	34.50	\$44,958.50	50.00	19.49	0.4288	1.0000	\$19,279.72	\$989.09
1973	35.50	\$72,762.50	50.00	18.77	0.4130	1.0000	\$30,052.98	\$1,600.78
1972	36.50	\$157,861.81	50.00	18.07	0.3975	1.0000	\$62,751.43	\$3,472.96
1971	37.50	\$1,122,122.22	50.00	17.38	0.3823	1.0000	\$428,976.77	\$24,686.69
1970	38.50	\$7,947,927.28	50.00	16.70	0.3674	1.0000	\$2,919,924.24	\$174,854.40
1969	39.50	\$288,834.50	50.00	16.04	0.3528	1.0000	\$101,899.45	\$6,354.36
1968	40.50	\$1,119,779.77	50.00	15.39	0.3385	1.0000	\$379,090.79	\$24,635.15
1967	41.50	\$560,424.38	50.00	14.76	0.3246	1.0000	\$181,932.46	\$12,329.34
1966	42.50	\$205,979.56	50.00	14.14	0.3111	1.0000	\$64,077.74	\$4,531.55
1965	43.50	\$638,407.23	50.00	13.54	0.2979	1.0000	\$190,189.41	\$14,044.96
1964	44.50	\$273,778.14	50.00	12.96	0.2851	1.0000	\$78,059.40	\$6,023.12
1963	45.50	\$411,321.74	50.00	12.40	0.2727	1.0000	\$112,176.14	\$9,049.08
1962	46.50	\$89,598.87	50.00	11.85	0.2607	1.0000	\$23,360.98	\$1,971.18
1961	47.50	\$26,341.04	50.00	11.32	0.2491	1.0000	\$6,562.65	\$579.50
1960	48.50	\$24,116.18	50.00	10.82	0.2380	1.0000	\$5,739.06	\$530.56
1959	49.50	\$136,892.80	50.00	10.33	0.2272	1.0000	\$31,105.53	\$3,011.64
1958	50.50	\$231,532.24	50.00	9.86	0.2169	1.0000	\$50,218.99	\$5,093.71
1957	51.50	\$5,797.10	50.00	9.41	0.2070	1.0000	\$1,199.94	\$127.54
1956	52.50	\$23,397.09	50.00	8.98	0.1975	1.0000	\$4,620.80	\$514.74
1955	53.50	\$2,273.53	50.00	8.56	0.1884	1.0000	\$428.35	\$50.02
1954	54.50	\$156,809.32	50.00	8.17	0.1797	1.0000	\$28,181.81	\$3,449.81
1953	55.50	\$29,049.83	50.00	7.79	0.1714	1.0000	\$4,979.52	\$639.10
1952	56.50	\$6,277.17	50.00	7.43	0.1635	1.0000	\$1,026.17	\$138.10
1951	57.50	\$5,129.69	50.00	7.09	0.1559	1.0000	\$799.66	\$112.85
1950	58.50	\$1,573.06	50.00	6.76	0.1486	1.0000	\$233.80	\$34.61
1949	59.50	\$19,809.74	50.00	6.44	0.1417	1.0000	\$2,806.33	\$435.81
1948	60.50	\$4,149.85	50.00	6.14	0.1350	1.0000	\$560.15	\$91.30
1947	61.50	\$2,876.48	50.00	5.84	0.1285	1.0000	\$369.73	\$63.28
1946	62.50	\$1,300.51	50.00	5.56	0.1223	1.0000	\$159.06	\$28.61
1945	63.50	\$5,274.13	50.00	5.28	0.1162	1.0000	\$613.09	\$116.03
1944	64.50	\$890.54	50.00	5.01	0.1103	1.0000	\$98.25	\$19.59
1943	65.50	\$716.11	50.00	4.75	0.1045	1.0000	\$74.85	\$15.75

Generation Arrangement Report

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Account: KEPCo 101/6 356 - KY
 Dispersion: 50.00 - R3
 Average Net Salvage Rate: -10.00%
 Future Net Salvage Rate: -10.00%

Broad Group Procedure
 January 1, 2009

Vintage	Age	Surviving Plant	Avg Life	Remaining Life	Net Plant Ratio	Alloc Factor	Computed Net Plant	Accrual
1942	66.50	\$46,102.67	50.00	4.49	0.0988	1.0000	\$4,554.68	\$1,014.26
1941	67.50	\$676.35	50.00	4.23	0.0931	1.0000	\$62.98	\$14.88
1940	68.50	\$8,726.26	50.00	3.98	0.0875	1.0000	\$763.21	\$191.98
1939	69.50	\$34.10	50.00	3.72	0.0818	1.0000	\$2.79	\$0.75
1938	70.50	\$7,452.94	50.00	3.46	0.0762	1.0000	\$567.79	\$163.96
1937	71.50	\$405.52	50.00	3.21	0.0705	1.0000	\$28.61	\$8.92
1936	72.50	\$358.49	50.00	2.95	0.0649	1.0000	\$23.27	\$7.89
1935	73.50	\$36.94	50.00	2.70	0.0593	1.0000	\$2.19	\$0.81
1934	74.50	\$44.60	50.00	2.44	0.0538	1.0000	\$2.40	\$0.98
1933	75.50	\$24.60	50.00	2.19	0.0483	1.0000	\$1.19	\$0.54
1932	76.50	\$21.80	50.00	1.95	0.0428	1.0000	\$0.93	\$0.48
1931	77.50	\$14.41	50.00	1.71	0.0375	1.0000	\$0.54	\$0.32
1930	78.50	\$18.70	50.00	1.47	0.0323	1.0000	\$0.60	\$0.41
1929	79.50	\$34.80	50.00	1.24	0.0273	1.0000	\$0.95	\$0.77
1928	80.50	\$3.87	50.00	1.02	0.0224	1.0000	\$0.09	\$0.09
1927	81.50	\$2.05	50.00	0.81	0.0177	1.0000	\$0.04	\$0.05
1926	82.50	\$0.77	50.00	0.60	0.0132	1.0000	\$0.01	\$0.02
1925	83.50	\$0.01	50.00	0.25	0.0055	1.0000	\$0.00	\$0.00
1924	84.50	(\$0.50)	50.00	0.00	0.0000	0.0000	\$0.00	\$0.00
		\$109,075,670.29	50.00	31.38	0.6904	1.0000	\$75,309,529.20	\$2,399,664.76

Depreciation Reserve Summary

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Account: KEPCo 101/6 357 - KY
 Scenario: KEPCO TRANSMISSION 2008 NEW
 Dispersion: 37 - R2
 Average Net Salvage Rate: 0.00%
 Future Net Salvage Rate: 0.00%

Broad Group Procedure

January 1, 2009

	Plant Amt	Depreciation Reserve		Net Plant	
		Amount	Ratio	Amount	Ratio
Recorded	\$11,590.50	\$1,908.11	0.1646	\$9,682.39	0.8354
Computed	\$11,590.50	\$3,109.35	0.2683	\$8,481.15	0.7317
Difference		(\$1,201.24)	-0.1036	\$1,201.24	0.1036

Generation Arrangement Report

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Account: KEPCo 101/6 357 - KY

Dispersion: 37.00 - R2

Average Net Salvage Rate: 0.00%

Future Net Salvage Rate: 0.00%

Broad Group Procedure

January 1, 2009

Vintage	Age	Surviving Plant	Avg Life	Remaining Life	Net Plant Ratio	Alloc Factor	Computed Net Plant	Accrual
1997	11.50	\$11,590.50	37.00	27.07	0.7317	1.0000	\$8,481.15	\$313.26
		\$11,590.50	37.00	27.07	0.7317	1.0000	\$8,481.15	\$313.26

Depreciation Reserve Summary

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Account: KEPCo 101/6 358 - KY
 Scenario: KEPCO TRANSMISSION 2008 NEW
 Dispersion: 44 - R1
 Average Net Salvage Rate: 0.00%
 Future Net Salvage Rate: 0.00%

Broad Group Procedure

January 1, 2009

	Plant Amt	Depreciation Reserve		Net Plant	
		Amount	Ratio	Amount	Ratio
Recorded	\$106,066.50	\$25,908.95	0.2443	\$80,157.55	0.7557
Computed	\$106,066.50	\$42,219.85	0.3981	\$63,846.65	0.6019
Difference		(\$16,310.90)	-0.1538	\$16,310.90	0.1538

Generation Arrangement Report

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Account: KEPCo 101/6 358 - KY

Dispersion: 44.00 - R1

Average Net Salvage Rate: 0.00%

Future Net Salvage Rate: 0.00%

Broad Group Procedure

January 1, 2009

Vintage	Age	Surviving Plant	Avg Life	Remaining Life	Net Plant Ratio	Alloc Factor	Computed Net Plant	Accrual
1983	25.50	\$106,066.50	44.00	26.49	0.6019	1.0000	\$63,846.65	\$2,410.60
		\$106,066.50	44.00	26.49	0.6019	1.0000	\$63,846.65	\$2,410.60

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KENTUCKY POWER COMPANY
DEPRECIATION STUDY AS OF 12-31-08
DISTRIBUTION PLANT WORKPAPERS

LIFE ANALYSIS

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KENTUCKY POWER COMPANY
 Depreciation Study as of December 31, 2008
 Distribution Plant

Account	<u>3602 LAND RIGHTS</u>	
Depreciable Balance	\$4,178,635	
	<u>Current</u>	<u>Recommended</u>
Average Service Life (Yrs)	75	75
Iowa Curve	R4.0	R4.0
Gross Removal, %		0%
Gross Salvage, %		0%
Net Salvage %	0%	0%

No actuarial analysis was performed for the investment in this account due to the minimal retirement history. The recommendation is to continue the current current average service life and dispersion.

No removal cost or salvage is expected from retirements from this account.

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KENTUCKY POWER COMPANY
 Depreciation Study as of December 31, 2008
 Distribution Plant

Account	<u>361 STRUCTURES & IMPROVEMENTS</u>	
Depreciable Balance	\$4,273,118	
	<u>Current</u>	<u>Recommended</u>
Average Service Life (Yrs)	65	75
Iowa Curve	L0.5	L2.0
Gross Removal, %		5%
Gross Salvage, %		15%
Net Salvage %	0%	10%

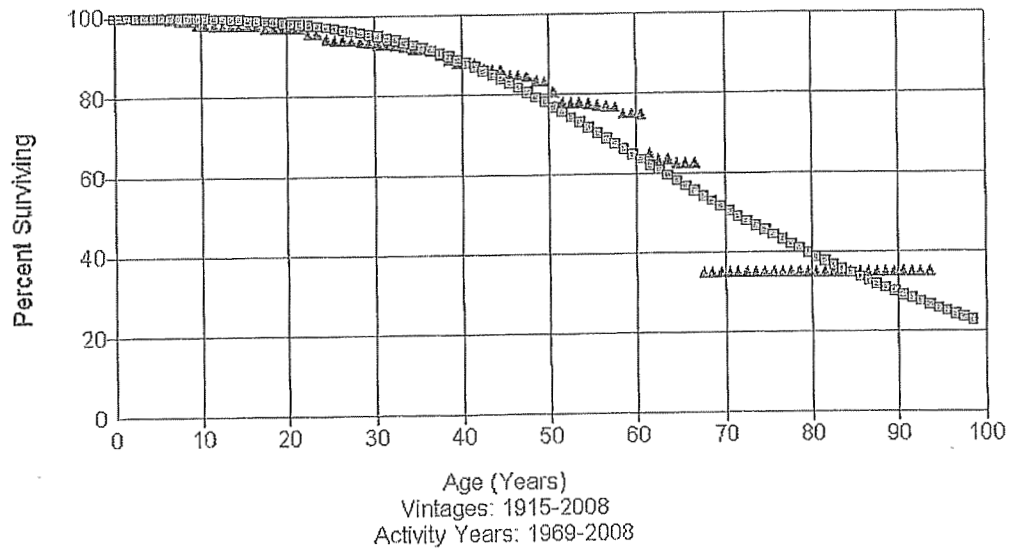
The actuarial analyses indicated the average service life for the investment in this account is increasing. Based on the analysis of the 40 year band, the recommendation is to move to a 75 year average service life following an L2.0 type retirement dispersion.

Removal costs would be expected from the removal and replacement of retirement units in this account. Salvage would likely be received from the scrap materials removed or replaced.

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Account: KEPCo 101/6 361 - KY
Scenario: KEPCO DISTRIBUTION 2008

▲ Actual Data □ L2 74.78



Actuarial Life Analysis

Account: KEPCo 101/6 361 - KY
Scenario: KEPCO DISTRIBUTION 2008
Placement Band: 1915 - 2008
Function: Survivorship Annual Rate Method
Weighting: Unweighted
T-Cut: None

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Observation Band	Censoring		Error Sum of Squares	Best Fit	
	Age	Percent		Disp	ASL
1969 -2008	93.5	35.02	0.32561113	L2	74.78

Surviving Percent Report

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Scenario: KEPCO DISTRIBUTION 2008
 Account: KEPCo 101/6 361 - KY
 Placement Band: 1915 - 2008

Observation Band: 1969- 2008

Age	Actual	L274.78
0.0	100.00	100.00
0.5	100.00	100.00
1.5	99.96	100.00
2.5	99.93	100.00
3.5	99.85	99.99
4.5	99.77	99.98
5.5	99.72	99.96
6.5	99.48	99.94
7.5	99.02	99.89
8.5	99.00	99.86
9.5	97.91	99.81
10.5	97.86	99.71
11.5	97.81	99.65
12.5	97.77	99.58
13.5	97.73	99.41
14.5	97.65	99.32
15.5	97.63	99.21
16.5	97.53	98.97
17.5	97.09	98.84
18.5	97.07	98.70
19.5	97.00	98.38
20.5	96.99	98.20
21.5	96.85	98.02
22.5	95.44	97.62
23.5	95.43	97.40
24.5	94.37	97.17
25.5	93.98	96.68
26.5	93.96	96.42
27.5	93.84	96.14
28.5	93.53	95.54
29.5	93.15	95.21
30.5	93.04	94.86
31.5	92.96	94.10
32.5	92.60	93.68
33.5	92.10	93.24
34.5	91.61	92.29
35.5	91.40	91.78
36.5	91.14	91.24
37.5	90.09	90.08
38.5	88.63	89.46
39.5	88.06	88.82
40.5	87.95	87.45
41.5	87.92	86.73
42.5	86.57	85.99
43.5	86.31	84.43
44.5	86.31	83.62
45.5	84.87	82.78
46.5	84.87	81.06
47.5	84.52	80.17
48.5	83.34	79.26
49.5	83.15	77.40
50.5	80.57	76.45
51.5	77.94	75.49
52.5	77.94	73.54
53.5	77.94	72.55

Surviving Percent Report

Scenario: KEPCO DISTRIBUTION 2008
Account: KEPCo 101/6 361 - KY
Placement Band: 1915 - 2008

Observation Band: 1969- 2008

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Age	Actual	L2 74.78
54.5	77.57	71.55
55.5	77.06	69.53
56.5	76.75	68.52
57.5	76.60	67.50
58.5	74.89	65.46
59.5	74.89	64.44
60.5	74.75	63.42
61.5	65.02	61.39
62.5	63.39	60.38
63.5	63.39	59.37
64.5	62.33	57.37
65.5	62.33	56.38
66.5	62.33	55.39
67.5	35.02	53.45
68.5	35.02	52.49
69.5	35.02	51.53
70.5	35.02	49.66
71.5	35.02	48.74
72.5	35.02	47.82
73.5	35.02	46.03
74.5	35.02	45.15
75.5	35.02	44.28
76.5	35.02	42.57
77.5	35.02	41.73
78.5	35.02	40.91
79.5	35.02	39.29
80.5	35.02	38.50
81.5	35.02	37.72
82.5	35.02	36.19
83.5	35.02	35.45
84.5	35.02	34.71
85.5	35.02	33.27
86.5	35.02	32.57
87.5	35.02	31.20
88.5	35.02	30.53
89.5	35.02	29.87
90.5	35.02	28.58
91.5	35.02	27.95
92.5	35.02	27.33
93.5	35.02	26.12

Observed Life Table

Scenario: KEPCO DISTRIBUTION 2008
 Account: KEPCo 101/6 361 - KY
 Placement Band: 1915 - 2008

Observation Band: 1969 - 2008

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Age at Beginning of Interval	Exposures at Beginning of Interval	Retirements During Interval	Retirement Ratio	Survivor Ratio	Percent Surv at Beginning of Interval
0	4,246,979.32	0.00	0.00000	1.00000	100.00
0.5	4,151,022.10	1,747.00	0.00042	0.99958	100.00
1.5	4,170,137.10	1,155.00	0.00028	0.99972	99.96
2.5	4,200,776.10	3,479.00	0.00083	0.99917	99.93
3.5	4,190,894.95	3,444.00	0.00082	0.99918	99.85
4.5	4,193,737.95	1,793.00	0.00043	0.99957	99.77
5.5	3,801,467.04	9,431.00	0.00248	0.99752	99.73
6.5	3,753,732.32	17,098.00	0.00455	0.99545	99.48
7.5	3,732,107.78	853.00	0.00023	0.99977	99.03
8.5	3,630,793.58	40,022.00	0.01102	0.98898	99.01
9.5	3,203,761.73	1,662.00	0.00052	0.99948	97.92
10.5	3,175,203.70	1,676.00	0.00053	0.99947	97.87
11.5	3,114,285.70	1,008.00	0.00032	0.99968	97.82
12.5	3,087,145.70	1,550.00	0.00050	0.99950	97.79
13.5	2,481,939.70	1,888.00	0.00076	0.99924	97.74
14.5	2,381,075.70	402.00	0.00017	0.99983	97.67
15.5	2,135,258.70	2,252.00	0.00105	0.99895	97.65
16.5	2,029,772.70	9,268.00	0.00457	0.99543	97.55
17.5	1,880,469.70	193.00	0.00011	0.99989	97.10
18.5	1,651,785.70	1,357.00	0.00082	0.99918	97.09
19.5	1,621,326.70	106.00	0.00007	0.99993	97.01
20.5	1,591,956.70	2,211.00	0.00139	0.99861	97.00
21.5	1,464,363.70	21,325.00	0.01456	0.98544	96.87
22.5	1,295,002.70	158.00	0.00012	0.99988	95.46
23.5	1,176,707.70	13,130.00	0.01116	0.98884	95.45
24.5	1,153,074.70	4,779.00	0.00414	0.99586	94.38
25.5	1,142,914.70	244.00	0.00021	0.99979	93.99
26.5	1,081,255.70	1,363.00	0.00126	0.99874	93.97
27.5	987,192.70	3,194.00	0.00324	0.99676	93.85
28.5	616,734.70	2,550.00	0.00413	0.99587	93.55
29.5	609,393.70	726.00	0.00119	0.99881	93.16
30.5	601,390.74	491.00	0.00082	0.99918	93.05
31.5	517,234.74	1,985.00	0.00384	0.99616	92.97
32.5	491,388.74	2,658.00	0.00541	0.99459	92.61
33.5	416,026.74	2,247.00	0.00540	0.99460	92.11
34.5	350,914.74	787.00	0.00224	0.99776	91.61
35.5	306,309.74	873.00	0.00285	0.99715	91.40
36.5	255,642.74	2,945.00	0.01152	0.98848	91.14
37.5	193,004.74	3,124.00	0.01619	0.98381	90.09
38.5	176,623.74	1,141.00	0.00646	0.99354	88.63
39.5	169,469.74	200.00	0.00118	0.99882	88.06
40.5	149,621.74	53.00	0.00035	0.99965	87.96
41.5	136,485.74	2,100.00	0.01539	0.98461	87.93
42.5	103,289.74	306.00	0.00296	0.99704	86.58
43.5	101,171.04	0.00	0.00000	1.00000	86.32
44.5	100,676.04	1,679.00	0.01668	0.98332	86.32
45.5	100,216.04	0.00	0.00000	1.00000	84.88
46.5	100,026.04	423.00	0.00423	0.99577	84.88
47.5	98,018.04	1,362.00	0.01390	0.98610	84.52
48.5	96,365.04	225.00	0.00233	0.99767	83.35
49.5	96,383.04	2,991.00	0.03103	0.96897	83.16
50.5	94,244.04	3,077.00	0.03265	0.96735	80.58
51.5	84,811.04	0.00	0.00000	1.00000	77.95
52.5	79,657.04	0.00	0.00000	1.00000	77.95

Observed Life Table

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Scenario: KEPCO DISTRIBUTION 2008
 Account: KEPCo 101/6 361 - KY
 Placement Band: 1915 - 2008

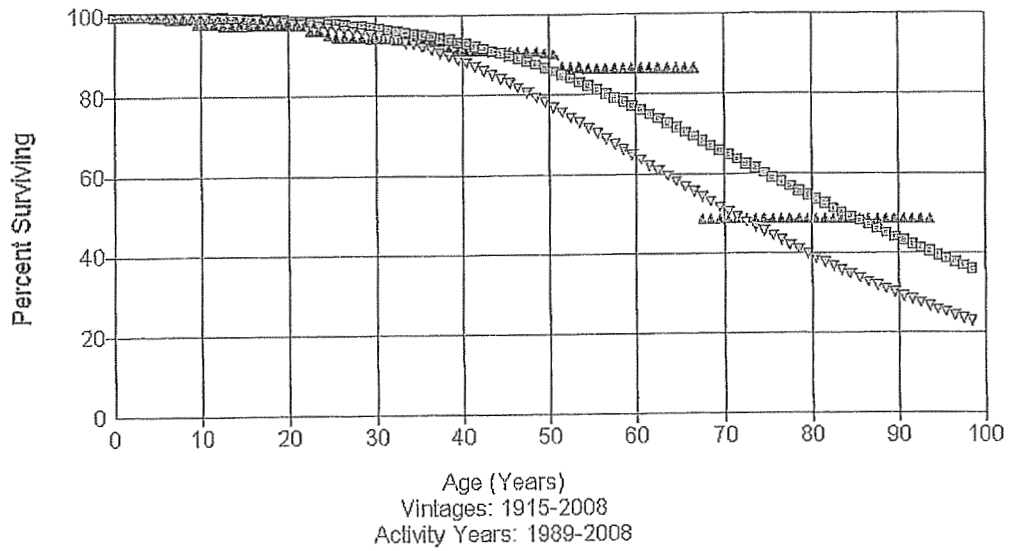
Observation Band: 1969 - 2008

Age at Beginning of Interval	Exposures at Beginning of Interval	Retirements During Interval	Refirment Ratio	Survivor Ratio	Percent Surv at Beginning of Interval
53.5	79,039.04	370.37	0.00468	0.99532	77.95
54.5	73,762.67	483.00	0.00655	0.99345	77.59
55.5	63,964.67	261.00	0.00408	0.99592	77.08
56.5	59,221.67	111.00	0.00187	0.99813	76.77
57.5	56,244.67	1,262.00	0.02244	0.97756	76.63
58.5	51,211.04	0.00	0.00000	1.00000	74.91
59.5	47,349.04	83.00	0.00175	0.99825	74.91
60.5	42,092.04	5,484.00	0.13029	0.86971	74.78
61.5	34,100.04	852.00	0.02499	0.97501	65.04
62.5	33,206.04	0.00	0.00000	1.00000	63.41
63.5	32,260.04	540.00	0.01674	0.98326	63.41
64.5	31,720.04	0.00	0.00000	1.00000	62.35
65.5	30,048.04	0.00	0.00000	1.00000	62.35
66.5	29,071.04	12,737.00	0.43813	0.56187	62.35
67.5	16,194.04	0.00	0.00000	1.00000	35.03
68.5	12,655.04	0.00	0.00000	1.00000	35.03
69.5	12,655.04	0.00	0.00000	1.00000	35.03
70.5	0.00	0.00	0.00000	1.00000	35.03

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Account: KEPCo 101/6 361 - KY
Scenario: KEPCO DISTRIBUTION 2008

△ Actual Data ■ L2 88.45 ▽ L2 74.78



Actuarial Life Analysis

Account: KEPCo 101/6 361 - KY
Scenario: KEPCO DISTRIBUTION 2008
Placement Band: 1915 - 2008
Function: Survivorship Annual Rate Method
Weighting: Unweighted
T-Cut: None

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Observation	Censoring		Error Sum	Best Fit	
Band	Age	Percent	of Squares	Disp	ASL
1989 -2008	93.5	48.54	0.45063600	1.2	88.45

Observed Life Table

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Scenario: KEPCO DISTRIBUTION 2008

Account: KEPCO 101/6 361 - KY

Placement Band: 1915 - 2008

Observation Band: 1989 - 2008

Age at Beginning of Interval	Exposures at Beginning of Interval	Retirements During Interval	Retirement Ratio	Survivor Ratio	Percent Surv at Beginning of Interval
0	2,737,953.32	0.00	0.00000	1.00000	100.00
0.5	2,653,484.10	234.00	0.00009	0.99991	100.00
1.5	2,781,948.10	448.00	0.00016	0.99984	99.99
2.5	2,929,705.10	829.00	0.00028	0.99972	99.97
3.5	3,040,132.25	2,497.00	0.00082	0.99918	99.94
4.5	3,048,138.25	1,793.00	0.00059	0.99941	99.86
5.5	2,657,614.34	7,015.00	0.00264	0.99736	99.80
6.5	2,674,560.62	6,923.00	0.00259	0.99741	99.54
7.5	2,754,921.08	408.00	0.00015	0.99985	99.28
8.5	3,031,509.88	40,011.00	0.01320	0.98680	99.27
9.5	2,611,749.03	837.00	0.00032	0.99968	97.96
10.5	2,624,916.00	1,563.00	0.00060	0.99940	97.93
11.5	2,639,490.00	808.00	0.00031	0.99969	97.87
12.5	2,628,438.00	156.00	0.00006	0.99994	97.84
13.5	2,096,381.00	0.00	0.00000	1.00000	97.83
14.5	2,063,729.00	0.00	0.00000	1.00000	97.83
15.5	1,854,687.00	1,792.00	0.00097	0.99903	97.83
16.5	1,810,935.00	432.00	0.00024	0.99976	97.74
17.5	1,526,962.00	193.00	0.00013	0.99987	97.72
18.5	1,507,912.00	127.00	0.00008	0.99992	97.71
19.5	1,481,479.00	106.00	0.00007	0.99993	97.70
20.5	1,468,035.00	462.00	0.00031	0.99969	97.69
21.5	1,359,260.00	20,039.00	0.01474	0.98526	97.66
22.5	1,222,603.00	80.00	0.00007	0.99993	96.22
23.5	1,105,672.70	12,591.00	0.01139	0.98861	96.21
24.5	1,085,045.70	4,779.00	0.00440	0.99560	95.11
25.5	1,078,539.70	158.00	0.00015	0.99985	94.69
26.5	1,016,106.70	1,314.00	0.00129	0.99871	94.68
27.5	924,428.70	916.00	0.00099	0.99901	94.56
28.5	550,326.70	351.00	0.00064	0.99936	94.47
29.5	544,218.70	726.00	0.00133	0.99867	94.41
30.5	501,659.70	491.00	0.00098	0.99902	94.28
31.5	424,059.70	1,972.00	0.00465	0.99535	94.19
32.5	403,696.70	0.00	0.00000	1.00000	93.75
33.5	331,855.70	0.00	0.00000	1.00000	93.75
34.5	273,996.70	49.00	0.00018	0.99982	93.75
35.5	238,571.70	0.00	0.00000	1.00000	93.73
36.5	193,259.70	0.00	0.00000	1.00000	93.73
37.5	135,949.70	3,058.00	0.02249	0.97751	93.73
38.5	123,776.70	350.00	0.00283	0.99717	91.62
39.5	120,318.70	200.00	0.00166	0.99834	91.36
40.5	104,499.70	0.00	0.00000	1.00000	91.21
41.5	91,899.70	75.00	0.00082	0.99918	91.21
42.5	60,770.70	306.00	0.00504	0.99496	91.14
43.5	59,598.00	0.00	0.00000	1.00000	90.68
44.5	59,103.00	0.00	0.00000	1.00000	90.68
45.5	55,573.00	0.00	0.00000	1.00000	90.68
46.5	56,360.00	0.00	0.00000	1.00000	90.68
47.5	54,915.00	0.00	0.00000	1.00000	90.68
48.5	58,163.00	225.00	0.00387	0.99613	90.68
49.5	57,745.00	162.00	0.00281	0.99719	90.33
50.5	86,052.04	3,077.00	0.03576	0.96424	90.08
51.5	76,619.04	0.00	0.00000	1.00000	86.86
52.5	70,664.04	0.00	0.00000	1.00000	86.86

Observed Life Table

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Scenario: KEPCO DISTRIBUTION 2008
 Account: KEPCo 101/6 361 - KY
 Placement Band: 1915 - 2008

Observation Band: 1989 - 2008

Age at Beginning of Interval	Exposures at Beginning of Interval	Retirements During Interval	Retirement Ratio	Survivor Ratio	Percent Surv at Beginning of Interval
53.5	69,963.04	370.37	0.00529	0.99471	86.86
54.5	64,686.67	0.00	0.00000	1.00000	86.40
55.5	55,371.67	0.00	0.00000	1.00000	86.40
56.5	50,889.67	0.00	0.00000	1.00000	86.40
57.5	48,023.67	0.00	0.00000	1.00000	86.40
58.5	44,252.04	0.00	0.00000	1.00000	86.40
59.5	40,390.04	0.00	0.00000	1.00000	86.40
60.5	35,216.04	0.00	0.00000	1.00000	86.40
61.5	32,708.04	0.00	0.00000	1.00000	86.40
62.5	32,666.04	0.00	0.00000	1.00000	86.40
63.5	31,720.04	0.00	0.00000	1.00000	86.40
64.5	31,720.04	0.00	0.00000	1.00000	86.40
65.5	30,048.04	0.00	0.00000	1.00000	86.40
66.5	29,071.04	12,737.00	0.43813	0.56187	86.40
67.5	16,194.04	0.00	0.00000	1.00000	48.55
68.5	12,655.04	0.00	0.00000	1.00000	48.55
69.5	12,655.04	0.00	0.00000	1.00000	48.55
70.5	0.00	0.00	0.00000	1.00000	48.55

Surviving Percent Report

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Scenario: KEPCO DISTRIBUTION 2008

Account: KEPCo 101/6 361 - KY

Placement Band: 1915 - 2008

Observation Band: 1989- 2008

Age	Actual	L2 88.45	L2 75.00
0.0	100.00	100.00	100.00
0.5	100.00	100.00	100.00
1.5	99.99	100.00	100.00
2.5	99.98	100.00	100.00
3.5	99.95	100.00	99.99
4.5	99.86	99.99	99.99
5.5	99.81	99.98	99.96
6.5	99.54	99.96	99.94
7.5	99.28	99.94	99.89
8.5	99.27	99.92	99.86
9.5	97.96	99.89	99.81
10.5	97.93	99.86	99.71
11.5	97.87	99.77	99.65
12.5	97.84	99.71	99.58
13.5	97.83	99.65	99.41
14.5	97.83	99.58	99.32
15.5	97.83	99.50	99.21
16.5	97.74	99.41	98.97
17.5	97.72	99.32	98.84
18.5	97.70	99.21	98.70
19.5	97.70	98.97	98.54
20.5	97.69	98.84	98.20
21.5	97.66	98.70	98.02
22.5	96.22	98.54	97.82
23.5	96.21	98.38	97.40
24.5	95.12	98.20	97.17
25.5	94.70	98.02	96.93
26.5	94.68	97.82	96.42
27.5	94.56	97.40	96.14
28.5	94.47	97.17	95.85
29.5	94.41	96.93	95.21
30.5	94.28	96.68	94.86
31.5	94.19	96.42	94.49
32.5	93.75	96.14	93.68
33.5	93.75	95.85	93.24
34.5	93.75	95.21	92.78
35.5	93.73	94.86	91.78
36.5	93.73	94.49	91.24
37.5	93.73	94.10	90.67
38.5	91.63	93.68	89.46
39.5	91.37	93.24	88.82
40.5	91.22	92.78	88.15
41.5	91.22	92.29	86.73
42.5	91.14	91.24	85.99
43.5	90.68	90.67	85.22
44.5	90.68	90.08	83.62
45.5	90.68	89.46	82.78
46.5	90.68	88.82	81.93
47.5	90.68	88.15	80.17
48.5	90.68	87.45	79.26
49.5	90.33	86.73	78.34
50.5	90.08	85.22	76.45
51.5	86.86	84.43	75.49
52.5	86.86	83.62	74.52
53.5	86.86	82.78	72.55

Surviving Percent Report

Scenario: KEPCO DISTRIBUTION 2008

Account: KEPCo 101/6 361 - KY

Placement Band: 1915 - 2008

Observation Band: 1989- 2008

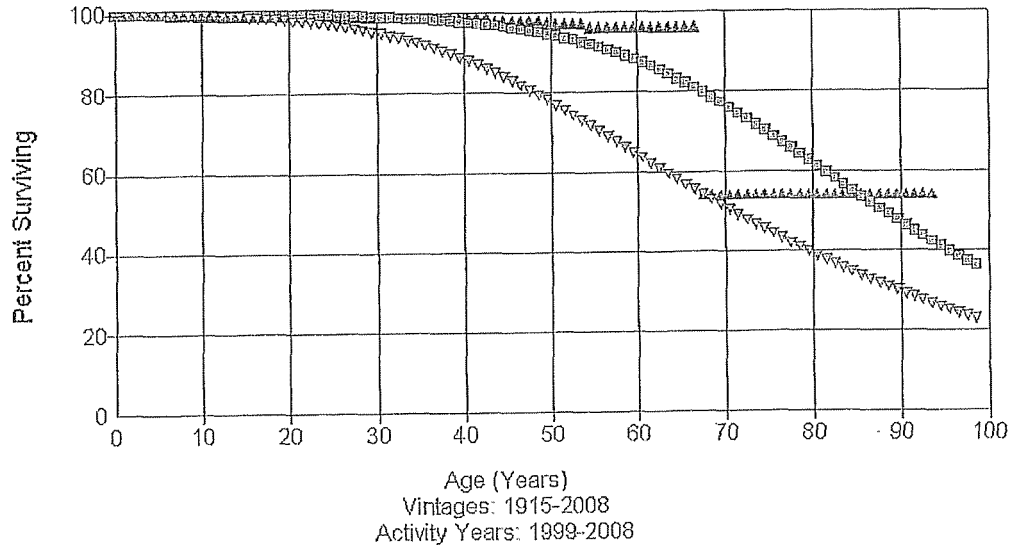
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Age	Actual	L2 88.45	L2 75.00
54.5	86.40	81.93	71.55
55.5	86.40	81.06	70.54
56.5	86.40	80.17	68.62
57.5	86.40	78.34	67.50
58.5	86.40	77.40	66.46
59.5	86.40	76.45	64.44
60.5	86.40	75.49	63.42
61.5	86.40	74.52	62.40
62.5	86.40	73.54	60.38
63.5	86.40	72.55	59.37
64.5	86.40	71.55	58.37
65.5	86.40	69.53	56.38
66.5	86.40	68.52	55.39
67.5	48.54	67.50	54.42
68.5	48.54	66.48	52.49
69.5	48.54	65.46	51.53
70.5	48.54	64.44	49.66
71.5	48.54	63.42	48.74
72.5	48.54	62.40	47.82
73.5	48.54	60.38	46.03
74.5	48.54	59.37	45.15
75.5	48.54	58.37	44.28
76.5	48.54	57.37	42.57
77.5	48.54	56.38	41.73
78.5	48.54	55.39	40.91
79.5	48.54	54.42	39.29
80.5	48.54	52.49	38.50
81.5	48.54	51.53	37.72
82.5	48.54	50.59	36.19
83.5	48.54	49.66	35.45
84.5	48.54	48.74	34.71
85.5	48.54	47.82	33.27
86.5	48.54	46.92	32.57
87.5	48.54	46.03	31.88
88.5	48.54	44.28	30.53
89.5	48.54	43.42	29.87
90.5	48.54	42.57	29.22
91.5	48.54	41.73	27.95
92.5	48.54	40.91	27.33
93.5	48.54	40.09	26.72

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Account: KEPCo 101/6 361 - KY
Scenario: KEPCO DISTRIBUTION 2008

▲ Actual Data ■ L3 91.45 ▼ L2 74.78



Actuarial Life Analysis

Account: KEPCo 101/6 361 - KY
Scenario: KEPCO DISTRIBUTION 2008
Placement Band: 1915 - 2008
Function: Survivorship Annual Rate Method
Weighting: Unweighted
T-Cut: None

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Observation	<u>Censoring</u>		Error Sum		<u>Best Fit</u>
Band	Age	Percent	<u>of Squares</u>	Disp	ASL
1999 -2008	93.5	53.99	0.60583962	L3	91.45

Observed Life Table

Scenario: KEPCO DISTRIBUTION 2008
 Account: KEPCo 101/6 361 - KY
 Placement Band: 1915 - 2008

Observation Band: 1999 - 2008

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Age at Beginning of Interval	Exposures at Beginning of Interval	Retirements During Interval	Retirement Ratio	Survivor Ratio	Percent Surv at Beginning of Interval
0	1,064,766.29	0.00	0.00000	1.00000	100.00
0.5	974,413.10	0.00	0.00000	1.00000	100.00
1.5	1,042,350.10	0.00	0.00000	1.00000	100.00
2.5	1,079,786.10	0.00	0.00000	1.00000	100.00
3.5	1,676,279.25	0.00	0.00000	1.00000	100.00
4.5	1,780,340.25	0.00	0.00000	1.00000	100.00
5.5	1,639,286.34	5,551.00	0.00339	0.99661	100.00
6.5	1,707,240.62	0.00	0.00000	1.00000	99.66
7.5	2,044,400.08	45.00	0.00002	0.99998	99.66
8.5	1,976,313.88	1,858.00	0.00094	0.99906	99.66
9.5	1,620,567.03	523.00	0.00032	0.99968	99.57
10.5	1,624,956.00	0.00	0.00000	1.00000	99.54
11.5	1,684,954.00	0.00	0.00000	1.00000	99.54
12.5	1,797,581.00	0.00	0.00000	1.00000	99.54
13.5	1,312,059.00	0.00	0.00000	1.00000	99.54
14.5	1,218,501.00	0.00	0.00000	1.00000	99.54
15.5	970,824.00	0.00	0.00000	1.00000	99.54
16.5	921,270.00	0.00	0.00000	1.00000	99.54
17.5	669,948.00	0.00	0.00000	1.00000	99.54
18.5	1,014,554.00	0.00	0.00000	1.00000	99.54
19.5	987,130.00	0.00	0.00000	1.00000	99.54
20.5	996,222.00	0.00	0.00000	1.00000	99.54
21.5	952,361.00	364.00	0.00038	0.99962	99.54
22.5	828,713.00	0.00	0.00000	1.00000	99.50
23.5	782,334.00	0.00	0.00000	1.00000	99.50
24.5	834,696.00	3,840.00	0.00460	0.99540	99.50
25.5	868,494.00	0.00	0.00000	1.00000	99.04
26.5	855,823.00	0.00	0.00000	1.00000	99.04
27.5	823,134.00	0.00	0.00000	1.00000	99.04
28.5	462,914.00	0.00	0.00000	1.00000	99.04
29.5	464,032.00	98.00	0.00021	0.99979	99.04
30.5	439,836.00	0.00	0.00000	1.00000	99.02
31.5	371,279.00	0.00	0.00000	1.00000	99.02
32.5	377,454.00	0.00	0.00000	1.00000	99.02
33.5	306,768.70	0.00	0.00000	1.00000	99.02
34.5	244,398.70	0.00	0.00000	1.00000	99.02
35.5	204,984.70	0.00	0.00000	1.00000	99.02
36.5	155,380.70	0.00	0.00000	1.00000	99.02
37.5	96,789.70	0.00	0.00000	1.00000	99.02
38.5	83,823.70	0.00	0.00000	1.00000	99.02
39.5	77,046.70	0.00	0.00000	1.00000	99.02
40.5	56,253.70	0.00	0.00000	1.00000	99.02
41.5	47,501.70	75.00	0.00158	0.99842	99.02
42.5	22,510.70	206.00	0.00915	0.99085	98.86
43.5	21,355.00	0.00	0.00000	1.00000	97.96
44.5	25,766.00	0.00	0.00000	1.00000	97.96
45.5	29,879.00	0.00	0.00000	1.00000	97.96
46.5	34,171.00	0.00	0.00000	1.00000	97.96
47.5	35,452.00	0.00	0.00000	1.00000	97.96
48.5	39,303.00	225.00	0.00572	0.99428	97.96
49.5	42,747.00	162.00	0.00379	0.99621	97.40
50.5	47,759.00	0.00	0.00000	1.00000	97.03
51.5	43,911.00	0.00	0.00000	1.00000	97.03
52.5	37,998.00	0.00	0.00000	1.00000	97.03

Observed Life Table

Scenario: KEPCO DISTRIBUTION 2008
 Account: KEPCo 101/6 361 - KY
 Placement Band: 1915 - 2008

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Observation Band: 1999 - 2008

Age at Beginning of Interval	Exposures at Beginning of Interval	Retirements During Interval	Retirement Ratio	Survivor Ratio	Percent Surv at Beginning of Interval
53.5	38,243.00	370.37	0.00967	0.99033	97.03
54.5	32,966.63	0.00	0.00000	1.00000	96.09
55.5	25,323.63	0.00	0.00000	1.00000	96.09
56.5	21,818.63	0.00	0.00000	1.00000	96.09
57.5	19,092.63	0.00	0.00000	1.00000	96.09
58.5	18,860.00	0.00	0.00000	1.00000	96.09
59.5	14,998.00	0.00	0.00000	1.00000	96.09
60.5	35,216.04	0.00	0.00000	1.00000	96.09
61.5	32,708.04	0.00	0.00000	1.00000	96.09
62.5	32,666.04	0.00	0.00000	1.00000	96.09
63.5	31,720.04	0.00	0.00000	1.00000	96.09
64.5	31,720.04	0.00	0.00000	1.00000	96.09
65.5	30,048.04	0.00	0.00000	1.00000	96.09
66.5	29,071.04	12,737.00	0.43813	0.56187	96.09
67.5	16,194.04	0.00	0.00000	1.00000	53.99
68.5	12,655.04	0.00	0.00000	1.00000	53.99
69.5	12,655.04	0.00	0.00000	1.00000	53.99
70.5	0.00	0.00	0.00000	1.00000	53.99

Surviving Percent Report

Scenario: KEPCO DISTRIBUTION 2008

Account: KEPCo 101/6 361 - KY

Placement Band: 1915 - 2008

Observation Band: 1999- 2008

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Age	Actual	L3 91.45	L2 75.00
0.0	100.00	100.00	100.00
0.5	100.00	100.00	100.00
1.5	100.00	100.00	100.00
2.5	100.00	100.00	100.00
3.5	100.00	100.00	99.99
4.5	100.00	100.00	99.99
5.5	100.00	100.00	99.96
6.5	99.66	100.00	99.94
7.5	99.66	100.00	99.89
8.5	99.66	100.00	99.86
9.5	99.57	100.00	99.81
10.5	99.53	100.00	99.71
11.5	99.53	100.00	99.65
12.5	99.53	100.00	99.58
13.5	99.53	99.99	99.41
14.5	99.53	99.99	99.32
15.5	99.53	99.98	99.21
16.5	99.53	99.96	98.97
17.5	99.53	99.94	98.84
18.5	99.53	99.92	98.70
19.5	99.53	99.90	98.54
20.5	99.53	99.87	98.20
21.5	99.53	99.84	98.02
22.5	99.50	99.80	97.82
23.5	99.50	99.76	97.40
24.5	99.50	99.71	97.17
25.5	99.04	99.65	96.93
26.5	99.04	99.59	96.42
27.5	99.04	99.45	96.14
28.5	99.04	99.37	95.85
29.5	99.04	99.28	95.21
30.5	99.02	99.18	94.86
31.5	99.02	99.07	94.49
32.5	99.02	98.95	93.68
33.5	99.02	98.83	93.24
34.5	99.02	98.70	92.78
35.5	99.02	98.55	91.78
36.5	99.02	98.40	91.24
37.5	99.02	98.06	90.67
38.5	99.02	97.87	89.46
39.5	99.02	97.67	88.82
40.5	99.02	97.45	88.15
41.5	99.02	97.22	86.73
42.5	98.86	96.98	85.99
43.5	97.96	96.72	85.22
44.5	97.96	96.44	83.62
45.5	97.96	96.15	82.78
46.5	97.96	95.83	81.93
47.5	97.96	95.49	80.17
48.5	97.96	94.75	79.26
49.5	97.39	94.33	78.34
50.5	97.03	93.89	76.45
51.5	97.03	93.42	75.49
52.5	97.03	92.92	74.52
53.5	97.03	92.39	72.55

Surviving Percent Report

Scenario: KEPCO DISTRIBUTION 2008

Account: KEPCo 101/6 361 - KY

Placement Band: 1915 - 2008

Observation Band: 1999- 2008

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Age	Actual	L3 91.45	L2 75.00
54.5	96.09	91.82	71.55
55.5	96.09	91.21	70.54
56.5	96.09	90.57	68.52
57.5	96.09	89.89	67.50
58.5	96.09	89.17	66.48
59.5	96.09	87.60	64.44
60.5	96.09	86.76	63.42
61.5	96.09	85.87	62.40
62.5	96.09	84.94	60.38
63.5	96.09	83.98	59.37
64.5	96.09	82.97	58.37
65.5	96.09	81.92	56.38
66.5	96.09	80.83	55.39
67.5	53.99	79.70	54.42
68.5	53.99	78.54	52.49
69.5	53.99	77.34	51.53
70.5	53.99	74.86	49.66
71.5	53.99	73.57	48.74
72.5	53.99	72.26	47.82
73.5	53.99	70.93	46.03
74.5	53.99	69.58	45.15
75.5	53.99	68.21	44.28
76.5	53.99	66.83	42.57
77.5	53.99	65.43	41.73
78.5	53.99	64.03	40.91
79.5	53.99	62.62	39.29
80.5	53.99	59.81	38.50
81.5	53.99	58.40	37.72
82.5	53.99	57.00	36.19
83.5	53.99	55.61	35.45
84.5	53.99	54.23	34.71
85.5	53.99	52.87	33.27
86.5	53.99	51.51	32.57
87.5	53.99	50.18	31.88
88.5	53.99	48.86	30.53
89.5	53.99	47.57	29.87
90.5	53.99	46.29	29.22
91.5	53.99	43.81	27.95
92.5	53.99	42.61	27.33
93.5	53.99	41.43	26.72

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KENTUCKY POWER COMPANY
 Depreciation Study as of December 31, 2008
 Distribution Plant

Account	<u>362 STATION EQUIPMENT</u>	
Depreciable Balance	\$48,811,224	
	<u>Current</u>	<u>Recommended</u>
Average Service Life (Yrs)	25	32
Iowa Curve	L.O.O	R1.0
Gross Removal, %		25%
Gross Salvage, %		35%
Net Salvage %	25%	10%

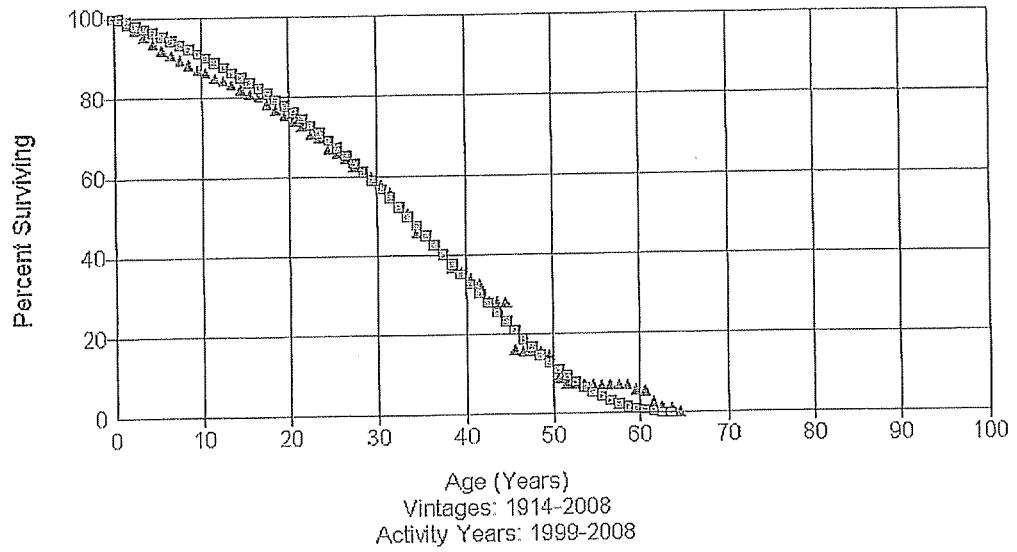
 The actuarial analysis of the 40 year band indicated the investment has experienced a complete life cycle. Based on the analysis of the 40 year band, the recommendation is to move to a 32 year average service life following an R1.0 type retirement dispersion.

Removal costs would be expected from labor, machine and transportation cost incurred in the retirement and replacement of equipment. Salvage could be received from the sale of equipment.

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Account: KEPCo 101/6 362 - KY
Scenario: KEPCO DISTRIBUTION 2008

▲ Actual Data □ R1 31 86



Actuarial Life Analysis

Account: KEPCo 101/6 362 - KY
Scenario: KEPCO DISTRIBUTION 2008
Placement Band: 1914 - 2008
Function: Survivorship Annual Rate Method
Weighting: Unweighted
T-Cut: None

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Observation	Censoring		Error Sum	Best Fit	
Band	Age	Percent	of Squares	Disp	ASL
1969 -2008	94.5	0.00	0.03943455	R1	31.86

Observed Life Table

Scenario: KEPCO DISTRIBUTION 2008

Account: KEPCo 101/6 362 - KY

Placement Band: 1914 - 2008

Observation Band: 1969 - 2008

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Age at Beginning of Interval	Exposures at Beginning of Interval	Retirements During Interval	Retirement Ratio	Survivor Ratio	Percent Surv at Beginning of Interval
0	59,985,742.89	95,997.00	0.00160	0.99840	100.00
0.5	59,323,302.21	787,640.82	0.01328	0.98672	99.84
1.5	56,260,881.34	961,667.23	0.01709	0.98291	98.51
2.5	52,496,365.06	787,381.07	0.01500	0.98500	96.83
3.5	48,262,548.88	883,989.43	0.01832	0.98168	95.38
4.5	46,863,612.93	870,467.55	0.01857	0.98143	93.63
5.5	45,040,509.33	564,357.53	0.01253	0.98747	91.89
6.5	43,870,474.71	590,977.03	0.01347	0.98653	90.74
7.5	41,310,178.14	608,387.84	0.01473	0.98527	89.52
8.5	39,025,002.34	509,696.24	0.01306	0.98694	88.20
9.5	37,488,552.39	375,115.70	0.01001	0.98999	87.05
10.5	36,399,250.11	516,939.35	0.01420	0.98580	86.18
11.5	34,269,086.91	340,545.36	0.00994	0.99006	84.96
12.5	32,265,407.49	380,919.42	0.01181	0.98819	84.12
13.5	27,506,410.48	353,632.11	0.01286	0.98714	83.13
14.5	25,870,415.65	379,032.58	0.01465	0.98535	82.06
15.5	22,316,533.76	223,168.02	0.01000	0.99000	80.86
16.5	21,122,946.21	479,248.43	0.02269	0.97731	80.05
17.5	19,283,088.40	326,077.46	0.01691	0.98309	78.23
18.5	18,638,065.72	392,058.95	0.02104	0.97896	76.91
19.5	17,924,689.42	295,941.08	0.01651	0.98349	75.29
20.5	17,446,790.83	322,228.18	0.01847	0.98153	74.05
21.5	15,461,836.06	458,812.55	0.02967	0.97033	72.68
22.5	13,817,901.14	219,271.18	0.01587	0.98413	70.52
23.5	12,968,924.12	506,496.37	0.03905	0.96095	69.40
24.5	11,819,895.00	166,890.39	0.01412	0.98588	66.69
25.5	10,947,470.25	210,003.59	0.01918	0.98082	65.75
26.5	9,762,598.13	344,075.32	0.03524	0.96476	64.49
27.5	8,734,296.39	140,671.46	0.01611	0.98389	62.22
28.5	6,162,356.68	163,183.85	0.02648	0.97352	61.22
29.5	5,571,673.14	182,596.92	0.03277	0.96723	59.60
30.5	4,565,331.66	170,685.72	0.03739	0.96261	57.65
31.5	3,697,547.84	220,582.40	0.05966	0.94034	55.49
32.5	3,338,844.77	107,673.01	0.03225	0.96775	52.18
33.5	2,899,794.83	292,997.95	0.10104	0.89896	50.50
34.5	2,322,768.13	35,180.41	0.01515	0.98485	45.40
35.5	1,863,045.96	94,900.00	0.05094	0.94906	44.71
36.5	1,260,741.63	70,970.12	0.05629	0.94371	42.43
37.5	921,418.79	79,953.11	0.08677	0.91323	40.04
38.5	765,507.98	19,569.00	0.02556	0.97444	36.57
39.5	728,441.97	34,540.43	0.04742	0.95258	35.64
40.5	572,590.96	23,938.39	0.04181	0.95819	33.95
41.5	437,736.97	56,689.84	0.12951	0.87049	32.53
42.5	329,186.59	2,981.00	0.00906	0.99094	28.32
43.5	325,218.59	1,312.00	0.00403	0.99597	28.06
44.5	304,618.57	129,889.59	0.42640	0.57360	27.95
45.5	107,889.15	1,647.00	0.01527	0.98473	16.03
46.5	111,031.21	823.00	0.00741	0.99259	15.79
47.5	83,649.55	409.00	0.00489	0.99511	15.67
48.5	93,364.55	5,126.00	0.05490	0.94510	15.59
49.5	93,290.55	36,688.00	0.39326	0.60674	14.73
50.5	61,392.55	10,337.00	0.16837	0.83163	8.94
51.5	35,019.00	0.00	0.00000	1.00000	7.43
52.5	40,616.00	954.00	0.02349	0.97651	7.43

Observed Life Table

Scenario: **KEPCO DISTRIBUTION 2008**
 Account: **KEPCo 101/6 362 - KY**
 Placement Band: **1914 - 2008**

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Observation Band: **1969 - 2008**

Age at Beginning of Interval	Exposures at Beginning of Interval	Retirements During Interval	Retirement Ratio	Survivor Ratio	Percent Surv at Beginning of Interval
53.5	41,790.00	906.00	0.02168	0.97832	7.26
54.5	41,960.00	870.00	0.02073	0.97927	7.10
55.5	41,090.00	379.00	0.00922	0.99078	6.95
56.5	40,711.00	0.00	0.00000	1.00000	6.89
57.5	40,711.00	0.00	0.00000	1.00000	6.89
58.5	40,711.00	6,534.00	0.16050	0.83950	6.89
59.5	34,177.00	2,128.00	0.06226	0.93774	5.78
60.5	32,049.00	16,211.00	0.50582	0.49418	5.42
61.5	15,838.00	7,606.00	0.48024	0.51976	2.68
62.5	8,232.00	3,014.00	0.36613	0.63387	1.39
63.5	5,218.00	4,350.00	0.83365	0.16635	0.88
64.5	868.00	868.00	1.00000	0.00000	0.15
65.5	0.00	0.00	0.00000	1.00000	0.00

Surviving Percent Report

Scenario: KEPCO DISTRIBUTION 2008
Account: KEPCo 101/6 362 - KY
Placement Band: 1914 - 2008

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Observation Band: 1969 - 2008

Age	Actual	R1 31.86
0.0	100.00	100.00
0.5	99.84	99.74
1.5	98.51	98.95
2.5	96.83	98.12
3.5	95.38	97.26
4.5	93.63	96.06
5.5	91.89	95.12
6.5	90.74	94.15
7.5	89.52	93.15
8.5	88.20	92.12
9.5	87.05	91.05
10.5	86.18	89.96
11.5	84.95	88.45
12.5	84.11	87.28
13.5	83.12	86.08
14.5	82.05	84.83
15.5	80.85	83.55
16.5	80.04	82.22
17.5	78.22	80.84
18.5	76.90	78.93
19.5	75.28	77.43
20.5	74.04	75.88
21.5	72.67	74.28
22.5	70.51	72.61
23.5	69.39	70.89
24.5	66.68	69.11
25.5	65.74	66.66
26.5	64.48	64.74
27.5	62.21	62.77
28.5	61.21	60.74
29.5	59.59	58.66
30.5	57.63	56.54
31.5	55.48	54.36
32.5	52.17	51.40
33.5	50.49	49.14
34.5	45.39	46.85
35.5	44.70	44.53
36.5	42.42	42.20
37.5	40.03	39.85
38.5	36.56	37.50
39.5	35.63	35.15
40.5	33.94	32.04
41.5	32.52	29.73
42.5	28.31	27.45
43.5	28.05	25.21
44.5	27.94	23.02
45.5	16.02	20.89
46.5	15.78	18.83
47.5	15.66	16.19
48.5	15.59	14.31
49.5	14.73	12.53
50.5	8.94	10.86
51.5	7.43	9.29
52.5	7.43	7.84
53.5	7.26	6.52

Surviving Percent Report

Scenario: KEPCO DISTRIBUTION 2008
Account: KEPCO 101/6 362 - KY
Placement Band: 1914 - 2008

Observation Band: 1969 - 2008

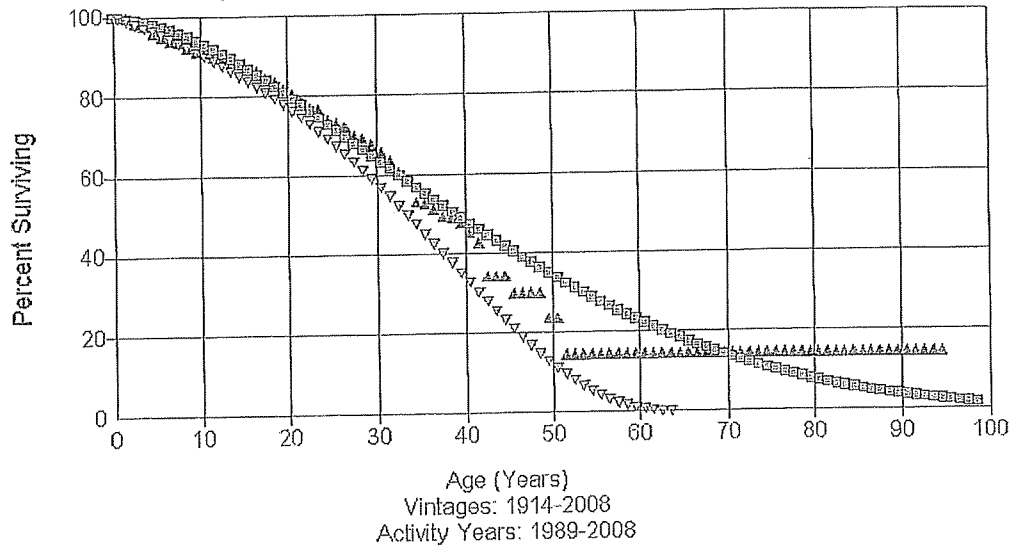
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Age	Actual	R1 31.86
54.5	7.10	4.95
55.5	6.95	3.93
56.5	6.89	3.04
57.5	6.89	2.23
58.5	6.89	1.65
59.5	5.78	1.14
60.5	5.42	0.73
61.5	2.68	0.33
62.5	1.39	0.13
63.5	0.88	0.03
64.5	0.15	0
65.5	0	0
66.5	0	
67.5	0	
68.5	0	
69.5	0	
70.5	0	
71.5	0	
72.5	0	
73.5	0	
74.5	0	
75.5	0	
76.5	0	
77.5	0	
78.5	0	
79.5	0	
80.5	0	
81.5	0	
82.5	0	
83.5	0	
84.5	0	
85.5	0	
86.5	0	
87.5	0	
88.5	0	
89.5	0	
90.5	0	
91.5	0	
92.5	0	
93.5	0	
94.5	0	

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Account: KEPCo 101/6 362 - KY
Scenario: KEPCO DISTRIBUTION 2008

△ Actual Data □ L0.5 41.66 ▽ R1 31.86



Actuarial Life Analysis

Account: KEPCo 101/6 362 - KY
Scenario: KEPCO DISTRIBUTION 2008
Placement Band: 1914 - 2008
Function: Survivorship Annual Rate Method
Weighting: Unweighted
T-Cut: None

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Observation Band	Censoring		Error Sum of Squares	Best Fit	
	Age	Percent		Disp	ASL
1989 -2008	94.5	14.28	0.54205905	10.5	41.66

Observed Life Table

Scenario: KEPCO DISTRIBUTION 2008
 Account: KEPCo 101/6 362 - KY
 Placement Band: 1914 - 2008

Observation Band: 1989 - 2008

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Age at Beginning of Interval	Exposures at Beginning of Interval	Retirements During Interval	Retirement Ratio	Survivor Ratio	Percent Surv at Beginning of Interval
0	37,957,986.01	16,504.00	0.00043	0.99957	100.00
0.5	37,300,146.32	51,511.82	0.00138	0.99862	99.96
1.5	36,461,883.03	498,479.23	0.01367	0.98633	99.82
2.5	34,689,274.60	267,113.07	0.00770	0.99230	98.46
3.5	31,755,382.20	562,794.43	0.01772	0.98228	97.70
4.5	31,189,687.75	334,487.55	0.01072	0.98928	95.97
5.5	30,735,830.39	322,047.53	0.01048	0.98952	94.94
6.5	30,865,836.23	88,848.03	0.00288	0.99712	93.95
7.5	29,727,140.51	420,317.84	0.01414	0.98586	93.68
8.5	30,367,823.90	403,059.24	0.01327	0.98673	92.36
9.5	29,380,405.09	152,391.70	0.00519	0.99481	91.13
10.5	29,986,166.96	301,335.35	0.01005	0.98995	90.66
11.5	28,933,244.35	139,100.36	0.00481	0.99519	89.75
12.5	27,274,422.60	237,548.42	0.00871	0.99129	89.32
13.5	23,040,336.16	146,148.11	0.00634	0.99366	88.54
14.5	22,099,722.38	299,057.58	0.01353	0.98647	87.98
15.5	19,156,963.00	116,162.02	0.00606	0.99394	86.79
16.5	18,918,290.84	378,903.43	0.02003	0.97997	86.26
17.5	17,415,568.57	251,522.46	0.01444	0.98556	84.53
18.5	17,010,660.06	330,036.95	0.01940	0.98060	83.31
19.5	16,263,927.76	246,577.08	0.01516	0.98484	81.69
20.5	15,934,437.04	305,586.18	0.01918	0.98082	80.45
21.5	14,082,897.88	355,474.55	0.02524	0.97476	78.91
22.5	12,707,922.78	71,642.18	0.00564	0.99436	76.92
23.5	12,003,443.76	421,134.37	0.03508	0.96492	76.49
24.5	11,005,971.60	96,852.39	0.00880	0.99120	73.81
25.5	10,315,144.85	130,060.59	0.01261	0.98739	73.16
26.5	9,246,955.73	326,467.32	0.03531	0.96469	72.24
27.5	8,266,777.25	64,674.46	0.00782	0.99218	69.69
28.5	5,762,620.54	138,862.85	0.02410	0.97590	69.15
29.5	5,195,648.00	138,480.92	0.02665	0.97335	67.48
30.5	4,152,656.52	145,231.72	0.03497	0.96503	65.68
31.5	3,332,000.84	157,259.40	0.04720	0.95280	63.38
32.5	3,033,410.77	78,033.01	0.02572	0.97428	60.39
33.5	2,625,717.83	263,309.95	0.10028	0.89972	58.84
34.5	2,078,826.13	17,202.41	0.00827	0.99173	52.94
35.5	1,632,459.96	42,392.00	0.02597	0.97403	52.50
36.5	1,083,256.63	40,515.12	0.03740	0.96260	51.14
37.5	774,364.79	6,744.11	0.00871	0.99129	49.23
38.5	594,709.98	15,499.00	0.02606	0.97394	48.80
39.5	558,988.97	28,997.43	0.05187	0.94813	47.53
40.5	404,996.96	23,426.39	0.05784	0.94216	45.06
41.5	270,245.97	53,032.84	0.19624	0.80376	42.45
42.5	163,531.59	0.00	0.00000	1.00000	34.12
43.5	162,544.59	0.00	0.00000	1.00000	34.12
44.5	143,256.57	17,999.59	0.12565	0.87435	34.12
45.5	57,184.15	0.00	0.00000	1.00000	29.83
46.5	46,920.21	0.00	0.00000	1.00000	29.83
47.5	20,361.55	0.00	0.00000	1.00000	29.83
48.5	20,361.55	4,325.00	0.21241	0.78759	29.83
49.5	16,036.55	0.00	0.00000	1.00000	23.49
50.5	26,373.55	10,337.00	0.39194	0.60806	23.49
51.5	0.00	0.00	0.00000	1.00000	14.28

Surviving Percent Report

Scenario: KEPCO DISTRIBUTION 2008
 Account: KEPCo 101/6 362 - KY
 Placement Band: 1914 - 2008

Observation Band: 1989 - 2008

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Age	Actual	L0.5 41.66	R1 32.00
0.0	100.00	100.00	100.00
0.5	99.96	99.91	99.74
1.5	99.82	99.63	98.95
2.5	98.45	99.06	98.12
3.5	97.70	98.60	97.26
4.5	95.96	98.08	96.06
5.5	94.94	97.21	95.12
6.5	93.94	96.56	94.15
7.5	93.67	95.50	93.15
8.5	92.35	94.73	92.12
9.5	91.12	93.92	91.05
10.5	90.65	92.61	89.96
11.5	89.74	91.68	88.84
12.5	89.30	90.20	87.28
13.5	88.53	89.16	86.08
14.5	87.97	88.08	84.83
15.5	86.78	86.39	83.55
16.5	86.25	85.22	82.22
17.5	84.52	83.40	80.84
18.5	83.30	82.15	79.41
19.5	81.68	80.87	77.94
20.5	80.45	78.92	76.88
21.5	78.90	77.66	74.28
22.5	76.91	75.52	72.61
23.5	76.48	74.15	70.89
24.5	73.80	72.78	69.11
25.5	73.15	70.74	67.28
26.5	72.22	69.37	65.38
27.5	69.67	67.33	63.43
28.5	69.13	65.98	60.74
29.5	67.46	64.63	58.66
30.5	65.66	62.61	56.54
31.5	63.37	61.27	54.36
32.5	60.38	59.27	52.15
33.5	58.82	57.95	49.90
34.5	52.93	56.63	47.62
35.5	52.49	54.67	45.31
36.5	51.12	53.38	42.20
37.5	49.21	51.45	39.85
38.5	48.78	50.18	37.50
39.5	47.51	48.93	35.15
40.5	45.05	47.06	32.81
41.5	42.44	45.83	30.50
42.5	34.11	44.01	28.21
43.5	34.11	42.82	25.95
44.5	34.11	41.63	23.02
45.5	29.83	39.89	20.89
46.5	29.83	38.74	18.83
47.5	29.83	37.05	16.84
48.5	29.83	35.95	14.93
49.5	23.49	34.86	13.12
50.5	23.49	33.26	11.40
51.5	14.28	32.21	9.80
52.5	14.28	30.67	7.84
53.5	14.28	29.66	6.52

Surviving Percent Report

Scenario: KEPCO DISTRIBUTION 2008

Account: KEPCo 101/6 362 - KY

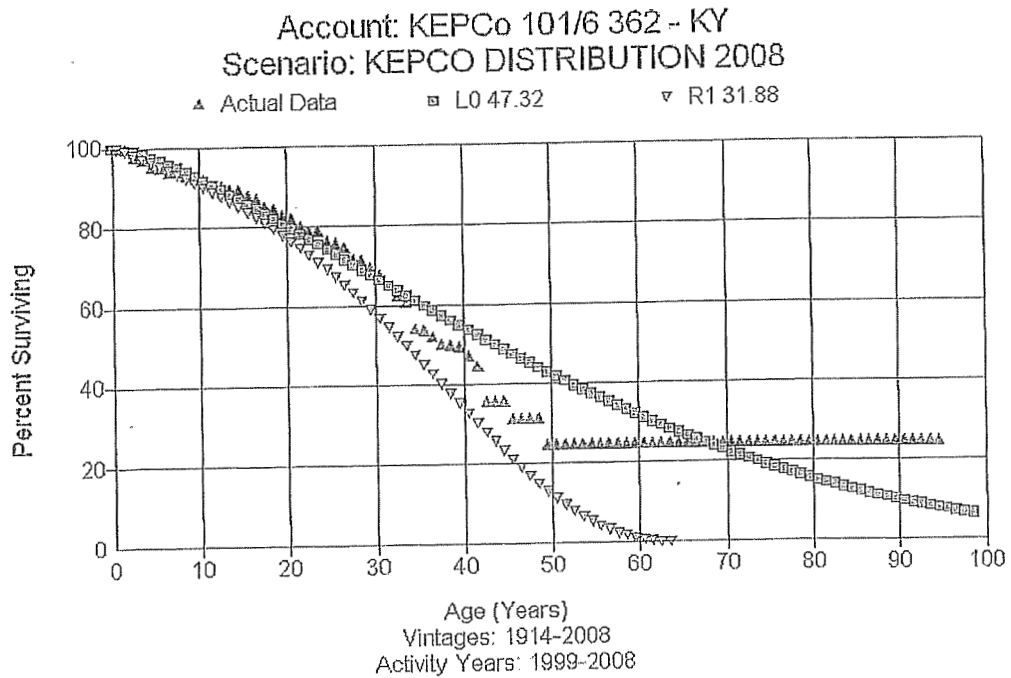
Placement Band: 1914 - 2008

Observation Band: 1989- 2008

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Age	Actual	L0.5 41.66	R1 32.00
54.5	14.28	28.68	5.32
55.5	14.28	27.23	4.25
56.5	14.28	26.29	3.32
57.5	14.28	24.92	2.52
58.5	14.28	24.03	1.84
59.5	14.28	23.15	1.30
60.5	14.28	21.88	0.73
61.5	14.28	21.05	0.41
62.5	14.28	19.85	0.19
63.5	14.28	19.07	0.05
64.5	14.28	18.32	0
65.5	14.28	17.22	0
66.5	14.28	16.51	
67.5	14.28	15.48	
68.5	14.28	14.82	
69.5	14.28	14.17	
70.5	14.28	13.25	
71.5	14.28	12.65	
72.5	14.28	11.79	
73.5	14.28	11.24	
74.5	14.28	10.71	
75.5	14.28	9.95	
76.5	14.28	9.46	
77.5	14.28	8.76	
78.5	14.28	8.32	
79.5	14.28	7.89	
80.5	14.28	7.28	
81.5	14.28	6.89	
82.5	14.28	6.34	
83.5	14.28	5.99	
84.5	14.28	5.65	
85.5	14.28	5.18	
86.5	14.28	4.88	
87.5	14.28	4.45	
88.5	14.28	4.19	
89.5	14.28	3.93	
90.5	14.28	3.57	
91.5	14.28	3.35	
92.5	14.28	3.04	
93.5	14.28	2.84	
94.5	14.28	2.65	

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Actuarial Life Analysis

Account: KEPCo 101/6 362 - KY
Scenario: KEPCO DISTRIBUTION 2008
Placement Band: 1914 - 2008
Function: Survivorship Annual Rate Method
Weighting: Unweighted
T-Cut: None

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Observation Band	Censoring		Error Sum of Squares	Best Fit	
	Age	Percent		Disp	ASL
1999 -2008	94.5	24.55	0.72537950	L0	47.32

Observed Life Table

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Scenario: KEPCO DISTRIBUTION 2008
 Account: KEPCo 101/6 362 - KY
 Placement Band: 1914 - 2008

Observation Band: 1999 - 2008

Age at Beginning of Interval	Exposures at Beginning of Interval	Retirements During Interval	Retirement Ratio	Survivor Ratio	Percent Surv at Beginning of Interval
0	18,620,137.60	0.00	0.00000	1.00000	100.00
0.5	18,484,500.18	12,446.82	0.00067	0.99933	100.00
1.5	17,769,316.42	412,437.23	0.02321	0.97679	99.93
2.5	16,114,584.22	111,518.07	0.00692	0.99308	97.61
3.5	16,989,947.79	303,627.43	0.01787	0.98213	96.93
4.5	17,515,445.34	30,509.55	0.00174	0.99826	95.20
5.5	19,878,524.35	224,615.53	0.01130	0.98870	95.03
6.5	20,163,669.69	34,778.03	0.00172	0.99828	93.96
7.5	19,738,975.08	210,394.84	0.01066	0.98934	93.80
8.5	18,182,056.50	109,542.24	0.00602	0.99398	92.80
9.5	17,523,694.99	70,593.70	0.00403	0.99597	92.24
10.5	16,953,099.57	232,867.35	0.01374	0.98626	91.87
11.5	16,870,723.42	74,533.36	0.00442	0.99558	90.61
12.5	16,746,953.67	107,773.42	0.00644	0.99356	90.21
13.5	12,910,001.44	50,175.11	0.00389	0.99611	89.63
14.5	12,207,607.07	204,400.58	0.01674	0.98326	89.28
15.5	9,521,461.42	67,920.02	0.00713	0.99287	87.79
16.5	9,544,610.33	213,636.43	0.02238	0.97762	87.16
17.5	8,762,174.63	62,887.46	0.00718	0.99282	85.21
18.5	10,949,283.14	209,011.95	0.01909	0.98091	84.60
19.5	10,721,353.98	138,259.08	0.01290	0.98710	82.98
20.5	11,543,816.54	269,998.18	0.02339	0.97661	81.91
21.5	10,435,816.50	116,508.55	0.01116	0.98884	79.99
22.5	9,280,736.25	36,453.18	0.00393	0.99607	79.10
23.5	8,994,976.80	291,755.37	0.03244	0.96756	78.79
24.5	8,495,720.73	56,832.39	0.00669	0.99331	76.23
25.5	8,347,695.49	117,823.59	0.01411	0.98589	75.72
26.5	8,026,414.76	299,542.32	0.03732	0.96268	74.65
27.5	7,364,494.56	37,844.46	0.00514	0.99486	71.86
28.5	5,093,262.02	131,311.85	0.02578	0.97422	71.49
29.5	4,586,363.48	136,865.92	0.02984	0.97016	69.65
30.5	3,679,398.87	141,708.72	0.03851	0.96149	67.57
31.5	2,960,403.66	119,092.40	0.04023	0.95977	64.97
32.5	2,762,042.41	74,820.01	0.02709	0.97291	62.36
33.5	2,357,051.47	261,784.95	0.11106	0.88894	60.67
34.5	1,834,546.73	16,711.41	0.00911	0.99089	53.93
35.5	1,497,139.56	42,196.00	0.02818	0.97182	53.44
36.5	1,004,343.23	35,488.12	0.03533	0.96467	51.93
37.5	732,916.65	6,744.11	0.00920	0.99080	50.10
38.5	556,478.84	2,760.00	0.00496	0.99504	49.64
39.5	533,444.83	25,750.43	0.04827	0.95173	49.39
40.5	382,699.82	21,662.39	0.05660	0.94340	47.01
41.5	270,245.97	53,032.84	0.19624	0.80376	44.35
42.5	163,531.59	0.00	0.00000	1.00000	35.65
43.5	162,544.59	0.00	0.00000	1.00000	35.65
44.5	143,256.57	17,999.59	0.12565	0.87435	35.65
45.5	57,184.15	0.00	0.00000	1.00000	31.17
46.5	46,920.21	0.00	0.00000	1.00000	31.17
47.5	20,361.55	0.00	0.00000	1.00000	31.17
48.5	20,361.55	4,325.00	0.21241	0.78759	31.17
49.5	16,036.55	0.00	0.00000	1.00000	24.55
50.5	16,036.55	0.00	0.00000	1.00000	24.55
51.5	0.00	0.00	0.00000	1.00000	24.55

Surviving Percent Report

Scenario: KEPCO DISTRIBUTION 2008

Account: KEPCo 101/6 362 - KY

Placement Band: 1914 - 2008

Observation Band: 1999- 2008

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Age	Actual	L0 47.32	R1 32.00
0.0	100.00	100.00	100.00
0.5	100.00	99.87	99.74
1.5	99.93	99.45	98.95
2.5	97.61	98.89	98.12
3.5	96.94	98.24	97.26
4.5	95.21	97.50	96.06
5.5	95.04	96.70	95.12
6.5	93.97	95.83	94.15
7.5	93.80	94.92	93.15
8.5	92.80	93.97	92.12
9.5	92.24	92.46	91.05
10.5	91.87	91.41	89.96
11.5	90.61	90.33	88.84
12.5	90.21	89.23	87.28
13.5	89.63	88.10	86.08
14.5	89.28	86.95	84.83
15.5	87.79	85.78	83.55
16.5	87.16	84.59	82.22
17.5	85.21	83.39	80.84
18.5	84.60	81.57	79.41
19.5	82.98	80.34	77.94
20.5	81.91	79.10	75.88
21.5	80.00	77.86	74.28
22.5	79.10	76.62	72.61
23.5	78.79	75.37	70.89
24.5	76.24	74.12	69.11
25.5	75.73	72.87	67.28
26.5	74.66	71.00	65.38
27.5	71.87	69.76	63.43
28.5	71.50	68.51	60.74
29.5	69.66	67.27	58.66
30.5	67.58	66.04	56.54
31.5	64.98	64.80	54.36
32.5	62.36	63.57	52.15
33.5	60.67	62.35	49.90
34.5	53.94	61.13	47.62
35.5	53.44	59.31	45.31
36.5	51.94	58.10	42.20
37.5	50.10	56.90	39.85
38.5	49.64	55.71	37.50
39.5	49.40	54.53	35.15
40.5	47.01	53.35	32.81
41.5	44.35	52.18	30.50
42.5	35.65	51.02	28.21
43.5	35.65	49.87	25.95
44.5	35.65	48.17	23.02
45.5	31.17	47.04	20.89
46.5	31.17	45.92	18.83
47.5	31.17	44.82	16.84
48.5	31.17	43.73	14.93
49.5	24.55	42.64	13.12
50.5	24.55	41.57	11.40
51.5	24.55	40.52	9.80
52.5	24.55	39.47	7.84
53.5	24.55	37.93	6.52

Surviving Percent Report

Scenario: KEPCO DISTRIBUTION 2008

Account: KEPCo 101/6 362 - KY

Placement Band: 1914 - 2008

Observation Band: 1999- 2008

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Age	Actual	L0 47.32	R1 32.00
54.5	24.55	36.91	5.32
55.5	24.55	35.92	4.25
56.5	24.55	34.93	3.32
57.5	24.55	33.96	2.52
58.5	24.55	33.00	1.84
59.5	24.55	32.06	1.30
60.5	24.55	31.13	0.73
61.5	24.55	30.21	0.41
62.5	24.55	28.87	0.19
63.5	24.55	27.99	0.05
64.5	24.55	27.13	0
65.5	24.55	26.28	0
66.5	24.55	25.45	
67.5	24.55	24.64	
68.5	24.55	23.84	
69.5	24.55	23.06	
70.5	24.55	22.29	
71.5	24.55	21.17	
72.5	24.55	20.44	
73.5	24.55	19.72	
74.5	24.55	19.03	
75.5	24.55	18.35	
76.5	24.55	17.68	
77.5	24.55	17.03	
78.5	24.55	16.40	
79.5	24.55	15.48	
80.5	24.55	14.88	
81.5	24.55	14.30	
82.5	24.55	13.74	
83.5	24.55	13.19	
84.5	24.55	12.66	
85.5	24.55	12.14	
86.5	24.55	11.63	
87.5	24.55	11.14	
88.5	24.55	10.44	
89.5	24.55	9.98	
90.5	24.55	9.54	
91.5	24.55	9.12	
92.5	24.55	8.71	
93.5	24.55	8.31	
94.5	24.55	7.92	

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KENTUCKY POWER COMPANY
 Depreciation Study as of December 31, 2008
 Distribution Plant

Account	<u>364 POLES, TOWERS & FIXTURES</u>	
Depreciable Balance	\$147,634,354	
	<u>Current</u>	<u>Recommended</u>
Average Service Life (Yrs)	28	30
Iowa Curve	L.O.O	R0.5
Gross Removal, %		65%
Gross Salvage, %		12%
Net Salvage %	25%	-53%

The simulation analyses for all bands indicate a retirement dispersion of an R0.5 type curve with an average service life of 30 years is appropriate for the investments in this account.

Extensive labor, equipment and transportation costs will be incurred in removing and replacing the equipment in this account. Some salvage could be experienced from the sale of scrap and the reuse of material.

Simulated Plant Record Analysis
 Kentucky Power - Distr

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Account: KEPCo 101/6 364 - KY
 Version: KEPCO DISTRIBUTION 2008
 Method: Simulated Balances

No. of Test Points: 40 Interval: 0 Observation Band: 1969 - 2008

Dispersion	Avg Service Life	Sum of Squared Differences	Index of Variation	Conformance Index	Retirement Experience Index
R0.5	30.4	6.04E+14	57.2584	17.46	100.00
R1	28.3	6.64E+14	60.0226	16.66	100.00
S-.5	30.5	6.73E+14	60.4641	16.54	100.00
L0	33.4	6.93E+14	61.3421	16.30	94.97
R1.5	27.0	7.60E+14	64.2570	15.56	100.00
L0.5	31.1	7.93E+14	65.6179	15.24	97.92
S0	28.4	8.12E+14	66.4026	15.06	100.00
S0.5	27.1	9.06E+14	70.1271	14.26	100.00
R2	25.8	9.10E+14	70.2920	14.23	100.00
L1	29.3	9.18E+14	70.6170	14.16	99.60
L1.5	28.0	1.03E+15	74.9007	13.35	99.91
S1	26.2	1.04E+15	75.0362	13.33	100.00
R2.5	25.2	1.07E+15	76.2524	13.11	100.00
S1.5	25.5	1.15E+15	79.0789	12.65	100.00
L2	26.7	1.19E+15	80.2815	12.46	100.00
R3	24.6	1.27E+15	83.1635	12.02	100.00
S2	24.9	1.30E+15	83.9522	11.91	100.00
L3	25.1	1.43E+15	88.0319	11.36	100.00
S3	24.3	1.55E+15	91.6566	10.91	100.00
R4	23.9	1.61E+15	93.5496	10.69	100.00
L4	24.0	1.67E+15	95.1517	10.51	100.00
S4	23.7	1.82E+15	99.3129	10.07	100.00
L5	23.6	1.89E+15	101.4303	9.86	100.00
R5	23.6	1.94E+15	102.7345	9.73	100.00
S5	23.3	2.02E+15	104.6839	9.55	100.00
S6	23.2	2.14E+15	107.8984	9.27	100.00
SQ	25.2	2.77E+15	122.6529	8.15	100.00

Simulated Plant Record Analysis
 Kentucky Power - Distr

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Account: KEPCo 101/6 364 - KY
 Version: KEPCO DISTRIBUTION 2008
 Method: Simulated Balances

No. of Test Points: 20 Interval: 0 Observation Band: 1989 - 2008

Dispersion	Avg Service Life	Sum of Squared Differences	Index of Variation	Conformance Index	Retirement Experience Index
R0.5	30.7	5.62E+14	50.7187	19.72	100.00
R1	28.6	6.24E+14	53.4006	18.73	100.00
S-.5	30.8	6.25E+14	53.4478	18.71	100.00
L0	33.8	6.40E+14	54.1176	18.48	94.67
R1.5	27.3	7.22E+14	57.4521	17.44	100.00
L0.5	31.4	7.34E+14	57.9397	17.26	97.74
S0	28.7	7.54E+14	58.7326	17.03	100.00
S0.5	27.4	8.47E+14	62.2338	16.07	100.00
L1	29.6	8.51E+14	62.3731	16.03	99.53
R2	26.1	8.68E+14	62.9960	15.87	100.00
L1.5	28.0	9.64E+14	66.3926	15.06	99.91
S1	26.4	9.75E+14	66.7782	14.97	100.00
R2.5	25.4	1.03E+15	68.5536	14.59	100.00
S1.5	25.8	1.09E+15	70.6360	14.16	100.00
_2	27.0	1.11E+15	71.3435	14.02	100.00
R3	24.6	1.22E+15	74.8219	13.37	100.00
S2	25.1	1.23E+15	75.1512	13.31	100.00
L3	25.4	1.36E+15	78.7368	12.70	100.00
S3	24.3	1.48E+15	82.3208	12.15	100.00
R4	23.9	1.55E+15	84.1745	11.88	100.00
L4	24.3	1.60E+15	85.5041	11.70	100.00
S4	23.7	1.75E+15	89.4260	11.18	100.00
L5	23.6	1.82E+15	91.3354	10.95	100.00
R5	23.6	1.87E+15	92.5067	10.81	100.00
S5	23.5	1.94E+15	94.2925	10.61	100.00
S6	23.4	2.07E+15	97.2606	10.28	100.00
SQ	25.2	2.65E+15	110.0287	9.09	100.00

Simulated Plant Record Analysis
 Kentucky Power - Distr

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Account: KEPCo 101/6 364 - KY
 Version: KEPCO DISTRIBUTION 2008
 Method: Simulated Balances

No. of Test Points: 10 Interval: 0 Observation Band: 1999 - 2008

Dispersion	Avg Service Life	Sum of Squared Differences	Index of Variation	Conformance Index	Retirement Experience Index
R0.5	32.9	9.24E+13	24.1807	41.36	100.00
L0	36.0	1.04E+14	25.6438	39.00	92.49
S-.5	32.7	1.04E+14	25.6576	38.97	100.00
R1	30.3	1.12E+14	26.5624	37.65	100.00
L0.5	33.5	1.26E+14	28.2749	35.37	96.32
S0	30.4	1.36E+14	29.2973	34.13	100.00
R1.5	28.8	1.41E+14	29.8738	33.47	100.00
L1	31.5	1.55E+14	31.2700	31.98	98.86
S0.5	29.1	1.62E+14	31.9889	31.26	100.00
R2	27.5	1.84E+14	34.1625	29.27	100.00
L1.5	30.0	1.86E+14	34.3339	29.13	99.67
S1	27.8	1.98E+14	35.3557	28.28	100.00
L2	28.6	2.26E+14	37.8498	26.42	99.98
R2.5	26.6	2.32E+14	38.3185	26.10	100.00
S1.5	27.1	2.33E+14	38.4052	26.04	100.00
S2	26.4	2.77E+14	41.8588	23.89	100.00
R3	25.6	2.92E+14	43.0057	23.25	100.00
L3	26.7	3.06E+14	43.9842	22.74	100.00
S3	25.5	3.59E+14	47.6854	20.97	100.00
R4	25.0	4.01E+14	50.3591	19.86	100.00
L4	25.2	4.04E+14	50.5587	19.78	100.00
S4	24.6	4.63E+14	54.1358	18.47	100.00
L5	24.6	5.00E+14	56.2499	17.78	100.00
R5	24.4	5.30E+14	57.8986	17.27	100.00
S5	24.5	5.62E+14	59.6024	16.78	100.00
S6	24.1	6.39E+14	63.5673	15.73	100.00
SQ	26.0	1.18E+15	86.5088	11.56	100.00

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Act. Yr.	Additions	Retirements	Ending Balance
2008	\$7,943,638	\$1,315,032	\$147,624,353
2007	\$8,178,275	\$1,283,667	\$140,990,747
2006	\$6,214,520	\$839,957	\$134,096,139
2005	\$4,777,960	\$728,627	\$128,721,576
2004	\$4,606,929	\$3,264,700	\$124,672,243
2003	\$3,549,389	\$770,546	\$123,330,114
2002	\$4,243,750	\$1,100,199	\$120,551,271
2001	\$5,491,237	\$1,402,184	\$117,407,710
2000	\$5,193,673	\$1,459,576	\$112,318,657
1999	\$7,750,006	\$779,722	\$107,584,560
1998	\$2,259,261	\$1,082,705	\$100,614,276
1997	\$2,175,205	\$1,542,829	\$89,437,720
1996	\$9,692,750	\$1,128,837	\$88,805,344
1995	\$5,532,239	\$1,671,011	\$90,241,421
1994	\$6,419,736	\$144,412	\$86,380,193
1993	\$5,227,092	\$1,304,149	\$80,104,569
1992	\$6,185,410	\$1,465,072	\$76,181,926
1991	\$6,088,191	\$1,480,558	\$71,461,588
1990	\$5,783,242	\$2,752,129	\$66,853,955
1989	\$5,307,552	\$3,823,950	\$63,822,842
1988	\$4,827,488	\$1,966,798	\$62,339,240
1987	\$5,327,380	\$1,507,747	\$59,478,550
1986	\$5,369,391	\$1,438,007	\$55,758,917
1985	\$4,909,635	\$837,730	\$51,827,533
1984	\$4,313,710	\$808,923	\$47,855,628
1983	\$4,439,316	\$768,785	\$44,350,841
1982	\$4,665,175	\$635,786	\$40,680,310
1981	\$5,303,340	\$1,253,167	\$36,650,921
1980	\$4,304,915	\$714,013	\$32,100,748
1979	\$3,884,010	\$638,797	\$28,009,846
1978	\$3,251,569	\$641,825	\$24,764,633
1977	\$3,061,702	\$373,298	\$22,054,889
1976	\$2,270,319	\$328,987	\$19,371,485
1975	\$1,611,041	\$258,071	\$17,430,153
1974	\$1,552,522	\$299,128	\$16,077,183

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Act. Yr.	Additions	Retirements	Ending Balance
1973	\$1,515,199	\$360,031	\$14,823,789
1972	\$1,255,246	\$292,633	\$13,666,621
1971	\$1,229,340	\$314,758	\$12,706,008
1970	\$840,500	\$269,359	\$11,791,426
1969	\$775,929	\$321,093	\$11,220,285
1968	\$779,145	\$366,869	\$10,765,449
1967	\$736,064	\$292,779	\$10,353,173
1966	\$623,348	\$243,858	\$9,909,888
1965	\$625,458	\$234,974	\$9,530,398
1964	\$510,960	\$197,965	\$9,139,914
1963	\$412,308	\$173,515	\$8,826,919
1962	\$374,871	\$151,846	\$8,588,126
1961	\$499,550	\$198,316	\$8,365,101
1960	\$350,996	\$152,841	\$8,063,867
1959	\$417,502	\$179,999	\$7,865,712
1958	\$460,209	\$145,963	\$7,628,209
1957	\$421,180	\$101,977	\$7,313,963
1956	\$364,630	\$98,076	\$6,994,760
1955	\$300,304	\$83,548	\$6,728,206
1954	\$286,975	\$69,917	\$6,511,450
1953	\$314,622	\$80,158	\$6,294,392
1952	\$352,512	\$62,890	\$6,059,928
1951	\$535,120	\$86,968	\$5,770,306
1950	\$649,686	\$74,781	\$5,322,154
1949	\$716,821	\$84,381	\$4,747,249
1948	\$927,453	\$64,525	\$4,114,809
1947	\$1,015,765	\$52,850	\$3,251,881
1946	\$836,816	\$19,182	\$2,288,966
1945	\$176,492	\$14,956	\$1,471,332
1944	\$51,306	\$15,239	\$1,309,796
1943	\$39,257	\$42,361	\$1,263,729
1942	\$117,724	\$4,914	\$1,256,853
1941	\$118,223	\$48,820	\$1,154,043
1940	\$206,783	\$83,909	\$1,084,640
1939	\$181,871	\$88,380	\$981,766

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10/20/2009	Act:Yr	Additions	Retirements	Ending Balance		
	1938	\$160,568	\$160,633	\$868,275	\$0	\$0
	1937	\$146,719	\$139,472	\$888,340	\$0	\$0
	1936	\$861,093	\$0	\$861,093	\$0	\$0

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KENTUCKY POWER COMPANY
 Depreciation Study as of December 31, 2008
 Distribution Plant

Account	<u>365 OVERHEAD CONDUCTOR & DEVICES</u>	
Depreciable Balance	\$129,155,638	
	<u>Current</u>	<u>Recommended</u>
Average Service Life (Yrs)	26	30
Iowa Curve	R1.5	R0.5
Gross Removal, %		25%
Gross Salvage, %		50%
Net Salvage %	25%	25%

 The simulation analyses for all bands indicate a retirement dispersion of an R0.5 type curve with an average service life of 30 years is appropriate for the investments in this account.

Removal costs should be expected from the labor and transportation costs involved in removing the conductor. Salvage costs would be expected from the sale of the conductor and the reuse of circuit breakers, insulators and switches.

Simulated Plant Record Analysis
 Kentucky Power - Distr

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Account: KEPCo 101/6 365 - KY
 Version: KEPCO DISTRIBUTION 2008
 Method: Simulated Balances

No. of Test Points: 40 Interval: 0 Observation Band: 1969 - 2008

Dispersion	Avg Service Life	Sum of Squared Differences	Index of Variation	Conformance Index	Retirement Experience Index
R0.5	30.4	2.53E+13	14.7225	67.92	100.00
L0	32.9	2.79E+13	15.4526	64.71	95.40
S-.5	30.3	2.99E+13	16.0078	62.47	100.00
R1	28.3	3.21E+13	16.5670	60.36	100.00
L0.5	30.7	3.84E+13	18.1235	55.18	98.17
S0	28.2	4.29E+13	19.1736	52.16	100.00
R1.5	27.1	4.44E+13	19.4854	51.32	100.00
L1	29.1	5.17E+13	21.0378	47.53	99.63
S0.5	27.3	5.53E+13	21.7619	45.95	100.00
R2	25.9	6.45E+13	23.4915	42.57	100.00
L1.5	27.8	6.79E+13	24.1080	41.48	99.92
S1	26.3	7.25E+13	24.9181	40.13	100.00
R2.5	25.2	8.92E+13	27.6272	35.20	100.00
L2	26.6	9.02E+13	27.7852	35.99	100.00
S1.5	25.7	9.11E+13	27.9291	35.80	100.00
S2	25.0	1.15E+14	31.3451	31.90	100.00
R3	24.6	1.22E+14	32.3320	30.93	100.00
L3	25.2	1.35E+14	34.0135	29.40	100.00
S3	24.4	1.64E+14	37.5224	26.65	100.00
R4	24.0	1.86E+14	39.9434	25.04	100.00
L4	24.3	1.91E+14	40.4413	24.73	100.00
S4	23.8	2.28E+14	44.1547	22.65	100.00
L5	23.7	2.50E+14	46.2385	21.63	100.00
R5	23.6	2.65E+14	47.6049	21.01	100.00
S5	23.7	2.84E+14	49.2787	20.29	100.00
S6	23.5	3.26E+14	52.8006	18.94	100.00
SQ	25.1	5.84E+14	70.7259	14.14	100.00

Simulated Plant Record Analysis
 Kentucky Power - Distr

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Account: KEPCo 101/6 365 - KY
 Version: KEPCO DISTRIBUTION 2008
 Method: Simulated Balances

No. of Test Points: 20 Interval: 0 Observation Band: 1989 - 2008

Dispersion	Avg Service Life	Sum of Squared Differences	Index of Variation	Conformance Index	Retirement Experience Index
R0.5	30.2	2.23E+13	12.9389	77.29	100.00
L0	32.9	2.44E+13	13.5099	74.02	95.40
S-.5	30.3	2.57E+13	13.8693	72.10	100.00
R1	28.4	2.88E+13	14.6810	68.12	100.00
L0.5	31.0	3.26E+13	15.6347	63.96	98.01
S0	28.2	3.67E+13	16.5783	60.32	100.00
R1.5	27.2	4.09E+13	17.5025	57.13	100.00
L1	29.1	4.33E+13	18.0185	55.50	99.63
S0.5	27.3	4.75E+13	18.8618	53.02	100.00
L1.5	27.8	5.84E+13	20.9304	47.78	99.92
R2	26.0	5.99E+13	21.1857	47.20	100.00
S1	26.3	6.33E+13	21.7764	45.92	100.00
L2	26.9	7.80E+13	24.1863	41.35	100.00
S1.5	25.7	8.16E+13	24.7340	40.43	100.00
R2.5	25.3	8.37E+13	25.0529	39.92	100.00
S2	25.0	1.05E+14	28.0258	35.68	100.00
R3	24.7	1.15E+14	29.2957	34.13	100.00
L3	25.3	1.22E+14	30.1992	33.11	100.00
S3	24.4	1.52E+14	33.7434	29.64	100.00
R4	24.1	1.74E+14	36.1153	27.69	100.00
L4	24.4	1.77E+14	36.4377	27.44	100.00
S4	23.8	2.13E+14	39.9727	25.02	100.00
L5	23.8	2.32E+14	41.7331	23.96	100.00
R5	23.7	2.47E+14	43.0138	23.25	100.00
S5	23.7	2.65E+14	44.5427	22.45	100.00
S6	23.5	3.04E+14	47.7480	20.94	100.00
SQ	25.1	5.38E+14	63.5296	15.74	100.00

Simulated Plant Record Analysis
 Kentucky Power - Distr

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Account: KEPCo 101/6 365 - KY
 Version: KEPCO DISTRIBUTION 2008
 Method: Simulated Balances

No. of Test Points: 10 Interval: 0 Observation Band: 1999 - 2008

Dispersion	Avg Service Life	Sum of Squared Differences	Index of Variation	Conformance Index	Retirement Experience Index
R0.5	30.7	5.09E+12	7.0698	141.45	100.00
S-.5	30.8	5.37E+12	7.2624	137.70	100.00
L0	33.4	5.39E+12	7.2726	137.50	94.98
R1	28.9	6.34E+12	7.8908	126.73	100.00
L0.5	31.4	6.52E+12	7.9977	125.04	97.75
S0	28.9	7.58E+12	8.6276	115.91	100.00
L1	29.8	8.38E+12	9.0704	110.25	99.46
R1.5	27.6	9.47E+12	9.6404	103.73	100.00
S0.5	27.7	1.02E+13	9.9849	100.15	100.00
L1.5	28.5	1.12E+13	10.4725	95.49	99.86
S1	27.0	1.39E+13	11.6758	85.65	100.00
R2	26.6	1.48E+13	12.0633	82.90	100.00
L2	27.5	1.50E+13	12.1489	82.31	100.00
S1.5	26.3	1.80E+13	13.3091	75.14	100.00
R2.5	25.9	2.13E+13	14.4553	69.18	100.00
S2	25.6	2.30E+13	15.0381	66.50	100.00
L3	25.9	2.56E+13	15.8474	63.10	100.00
R3	25.3	2.88E+13	16.8085	59.49	100.00
S3	25.0	3.54E+13	18.6302	53.68	100.00
L4	25.0	4.44E+13	20.8776	47.90	100.00
R4	24.7	4.63E+13	21.3134	46.92	100.00
S4	24.6	5.62E+13	23.4851	42.58	100.00
L5	24.4	6.60E+13	25.4440	39.30	100.00
R5	24.3	7.41E+13	26.9688	37.08	100.00
S5	24.2	8.09E+13	28.1716	35.50	100.00
S6	24.1	1.08E+14	32.6190	30.66	100.00
SQ	26.0	3.98E+14	62.4713	16.01	100.00

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Acct.Yr	Additions	Retirements	Ending Balance
2008	\$10,259,055	\$3,155,687	\$129,155,638
2007	\$14,237,195	\$2,993,281	\$122,052,270
2006	\$8,984,427	\$2,373,219	\$110,808,356
2005	\$6,436,239	\$1,665,652	\$104,197,148
2004	\$5,364,176	\$1,048,651	\$99,426,561
2003	\$4,069,103	\$1,665,159	\$95,111,036
2002	\$5,622,594	\$2,020,300	\$92,707,092
2001	\$5,169,647	\$1,323,285	\$89,104,798
2000	\$5,230,644	\$1,553,565	\$85,258,436
1999	\$6,688,639	\$767,232	\$81,581,367
1998	\$2,314,364	\$867,054	\$75,659,950
1997	\$7,910,940	\$1,666,505	\$74,212,640
1996	\$3,270,420	\$1,662,236	\$67,968,205
1995	\$5,785,493	\$2,549,129	\$66,360,021
1994	\$4,473,083	\$1,379,552	\$63,123,657
1993	\$2,861,816	\$758,447	\$60,030,126
1992	\$3,277,536	\$909,965	\$57,926,757
1991	\$3,654,148	\$1,060,633	\$55,559,086
1990	\$3,794,891	\$1,114,551	\$52,965,571
1989	\$3,611,129	\$899,096	\$50,286,231
1988	\$3,229,945	\$1,188,810	\$47,673,198
1987	\$3,764,540	\$1,004,247	\$45,532,063
1986	\$3,340,589	\$919,744	\$42,771,770
1985	\$2,604,959	\$519,259	\$40,350,925
1984	\$2,380,654	\$517,838	\$38,265,215
1983	\$2,562,107	\$598,823	\$36,402,399
1982	\$2,865,659	\$452,557	\$34,439,115
1981	\$4,443,270	\$876,800	\$32,026,013
1980	\$3,591,035	\$532,297	\$28,459,543
1979	\$3,199,783	\$516,238	\$25,400,805
1978	\$2,734,482	\$472,645	\$22,717,260
1977	\$3,143,781	\$369,728	\$20,455,423
1976	\$1,782,930	\$302,893	\$17,681,370
1975	\$1,026,632	\$230,227	\$16,201,333
1974	\$1,088,826	\$298,710	\$15,404,928

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Act.Yr.	Additions	Retirements	Ending Balance
1973	\$1,108,750	\$379,766	\$14,614,812
1972	\$1,152,475	\$309,059	\$13,885,928
1971	\$1,451,307	\$334,232	\$13,042,412
1970	\$1,150,481	\$281,292	\$11,925,337
1969	\$992,508	\$307,427	\$11,056,148
1968	\$949,626	\$293,616	\$10,371,067
1967	\$869,418	\$235,317	\$9,715,057
1966	\$728,131	\$219,295	\$9,080,956
1965	\$688,379	\$162,223	\$8,572,120
1964	\$600,173	\$118,173	\$8,065,964
1963	\$342,519	\$115,279	\$7,683,964
1962	\$356,863	\$110,412	\$7,456,724
1961	\$431,518	\$83,006	\$7,210,273
1960	\$309,663	\$119,535	\$6,861,761
1959	\$332,979	\$85,363	\$6,671,633
1958	\$411,734	\$100,947	\$6,425,017
1957	\$370,826	\$75,501	\$6,114,230
1956	\$335,384	\$67,420	\$5,818,905
1955	\$247,836	\$54,244	\$5,550,941
1954	\$237,566	\$58,761	\$5,357,349
1953	\$254,683	\$55,985	\$5,178,544
1952	\$291,012	\$43,132	\$4,979,846
1951	\$393,824	\$52,380	\$4,731,956
1950	\$509,472	\$43,539	\$4,390,522
1949	\$591,741	\$38,785	\$3,924,589
1948	\$780,371	\$33,031	\$3,371,633
1947	\$845,275	\$23,250	\$2,624,293
1946	\$521,149	\$8,911	\$1,802,268
1945	\$107,824	\$7,008	\$1,270,030
1944	\$34,927	\$8,392	\$1,169,214
1943	\$14,300	\$15,652	\$1,142,679
1942	\$71,460	\$1,863	\$1,144,031
1941	\$90,549	\$26,224	\$1,074,434
1940	\$125,801	\$56,768	\$1,010,109
1939	\$132,698	\$43,031	\$941,076

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Act. Yr.	Additions	Retirements	Ending Balance
1938	\$124,001	\$56,193	\$687,409
1937	\$120,859	\$109,143	\$788,601
1936	\$771,885	\$0	\$771,885

\$0
 \$0
 \$0

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KENTUCKY POWER COMPANY
 Depreciation Study as of December 31, 2008
 Distribution Plant

Account	<u>386 UNDERGROUND CONDUIT</u>	
Depreciable Balance	\$4,302,754	
	<u>Current</u>	<u>Recommended</u>
Average Service Life (Yrs)	37	50
Iowa Curve	R2.0	R0.5
Gross Removal, %		0%
Gross Salvage, %		0%
Net Salvage %	0%	0%

The simulation analyses for this account do not provide meaningful guidance for the selection of an average service life. However, it is obvious that the service life should be increased from the current 37 years. The recommendation is to move to a 50 year average service life following an R0.5 type curve.

Neither salvage nor removal is expected from this investment as it is likely the conduit will be retired in place.

Simulated Plant Record Analysis
 Kentucky Power - Distr

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Account: KEPCo 101/6 366 - KY
 Version: KEPCO DISTRIBUTION 2008
 Method: Simulated Balances

No. of Test Points: 40 Interval: 0 Observation Band: 1969 - 2008

Dispersion	Avg Service Life	Sum of Squared Differences	Index of Variation	Conformance Index	Retirement Experience Index
R0.5	145.3	4.23E+09	7.7780	128.57	21.12
R1	107.4	4.52E+09	8.0422	124.34	26.00
S-.5	121.7	4.74E+09	8.2384	121.38	26.43
R1.5	82.3	4.98E+09	8.4403	118.48	36.64
L0	123.2	5.60E+09	8.9570	111.64	30.77
L0.5	96.3	6.16E+09	9.3913	106.48	38.93
R2	62.1	6.40E+09	9.5694	104.50	64.07
S0	78.6	7.00E+09	10.0140	99.86	44.62
L1	73.8	8.11E+09	10.7753	92.80	53.19
R2.5	51.5	8.15E+09	10.8053	92.55	90.98
S0.5	65.2	8.22E+09	10.8452	92.21	58.92
L1.5	62.4	9.54E+09	11.6897	85.55	66.38
S1	54.1	1.11E+10	12.5957	79.39	78.78
R3	43.6	1.23E+10	13.2597	75.42	100.00
S1.5	48.4	1.30E+10	13.6185	73.43	91.63
L2	52.3	1.34E+10	13.8580	72.16	81.15
S2	43.7	1.68E+10	15.5096	64.48	98.78
L3	43.0	2.02E+10	17.0230	58.74	96.19
R4	37.8	2.23E+10	17.8689	55.96	100.00
S3	39.1	2.41E+10	18.5762	53.83	100.00
L4	38.1	2.83E+10	20.1302	49.68	99.98
S4	36.4	3.55E+10	22.5507	44.34	100.00
R5	35.6	4.00E+10	23.9263	41.80	100.00
L5	36.0	4.03E+10	24.0130	41.64	100.00
S5	35.2	4.72E+10	26.0049	38.45	100.00
S6	34.6	5.78E+10	28.7693	34.76	100.00
SQ	37.0	9.13E+10	36.1532	27.66	100.00

Simulated Plant Record Analysis
 Kentucky Power - Distr

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Account: KEPCo 101/6 366 - KY
 Version: KEPCO DISTRIBUTION 2008
 Method: Simulated Balances

No. of Test Points: 20 Interval: 0 Observation Band: 1989 - 2008

Dispersion	Avg Service Life	Sum of Squared Differences	Index of Variation	Conformance Index	Retirement Experience Index
R0.5	146.5	3.19E+09	5.5820	179.15	20.93
R1	108.3	3.40E+09	5.7638	173.50	25.70
S-.5	122.9	3.55E+09	5.8924	169.71	26.10
R1.5	83.0	3.73E+09	6.0432	165.48	36.07
L0	124.5	4.15E+09	6.3706	155.97	30.40
L0.5	97.3	4.57E+09	6.6843	149.60	38.42
R2	62.0	4.80E+09	6.8530	145.92	64.28
S0	79.4	5.15E+09	7.0974	140.90	43.99
L1	74.1	6.02E+09	7.6742	130.31	52.90
S0.5	65.2	6.05E+09	7.6955	129.95	58.92
R2.5	51.4	6.18E+09	7.7737	128.64	91.13
L1.5	62.7	7.13E+09	8.3495	119.77	66.06
S1	54.1	8.19E+09	8.9493	111.74	78.77
R3	43.8	9.49E+09	9.6339	103.80	99.99
S1.5	48.4	9.78E+09	9.7800	102.25	91.63
L2	52.6	1.03E+10	10.0216	99.78	80.87
S2	43.7	1.30E+10	11.2622	88.79	98.77
L3	43.2	1.63E+10	12.6079	79.32	96.04
R4	38.0	1.84E+10	13.4201	74.52	100.00
S3	39.1	1.97E+10	13.8964	71.96	100.00
L4	38.2	2.38E+10	15.2694	65.49	99.98
S4	36.4	3.10E+10	17.4127	57.43	100.00
R5	35.4	3.54E+10	18.6100	53.73	100.00
L5	36.0	3.58E+10	18.7034	53.47	100.00
S5	35.2	4.27E+10	20.4431	48.92	100.00
S6	34.6	5.33E+10	22.8350	43.79	100.00
SQ	37.0	8.68E+10	29.1354	34.32	100.00

Simulated Plant Record Analysis
 Kentucky Power - Distr

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Account: KEPCo 101/6 366 - KY
 Version: KEPCO DISTRIBUTION 2008
 Method: Simulated Balances

No. of Test Points: 10 Interval: 0 Observation Band: 1999 - 2008

Dispersion	Avg Service Life	Sum of Squared Differences	Index of Variation	Conformance Index	Retirement Experience Index
R0.5	153.3	1.05E+09	3.3244	300.81	19.89
R1	113.4	1.11E+09	3.4291	291.62	24.09
S-.5	128.6	1.17E+09	3.5073	285.12	24.67
R1.5	86.3	1.22E+09	3.5929	278.33	33.49
L0	129.0	1.37E+09	3.7999	263.16	29.14
L0.5	100.8	1.50E+09	3.9791	251.31	36.68
R2	63.8	1.57E+09	4.0747	245.42	60.51
S0	81.4	1.70E+09	4.2307	236.37	42.42
L1	76.8	1.95E+09	4.5371	220.41	50.59
S0.5	67.5	1.99E+09	4.5818	218.25	55.88
R2.5	53.0	2.03E+09	4.6350	215.75	88.27
L1.5	64.3	2.35E+09	4.9761	200.96	64.15
S1	55.5	2.67E+09	5.3050	188.50	76.30
S1.5	49.6	3.18E+09	5.7909	172.68	89.73
R3	44.8	3.23E+09	5.8439	171.12	99.93
L2	53.4	3.43E+09	6.0184	166.16	79.82
S2	44.9	4.18E+09	6.6422	150.55	98.05
L3	43.8	5.67E+09	7.7342	129.30	95.47
R4	38.2	6.68E+09	8.3999	119.05	100.00
S3	39.7	6.69E+09	8.4034	119.00	100.00
L4	38.5	9.03E+09	9.7661	102.40	99.98
S4	36.6	1.24E+10	11.4255	87.52	100.00
R5	35.5	1.57E+10	12.8799	77.64	100.00
L5	36.2	1.57E+10	12.8859	77.60	100.00
S5	35.4	2.06E+10	14.7515	67.79	100.00
S6	34.8	2.98E+10	17.7469	56.35	100.00
SQ	37.9	7.42E+10	27.9934	35.72	100.00

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	Acct	Additions	Retirements	Ending Balance
2008		\$332,819	\$694	\$4,302,754
2007		\$312,381	\$3,259	\$3,970,829
2006		\$509,176	\$7,368	\$3,661,507
2005		\$199,943	\$143	\$3,159,699
2004		\$173,356	\$2,052	\$2,959,899
2003		\$116,994	\$2,529	\$2,786,595
2002		\$134,439	\$16,353	\$2,672,530
2001		\$123,659	\$9,421	\$2,555,044
2000		\$182,080	\$6,479	\$2,440,806
1999		\$137,692	\$2,608	\$2,265,205
1998		\$60,158	\$1,777	\$2,130,121
1997		\$291,323	\$4,035	\$2,071,740
1996		\$131,833	\$3,248	\$1,784,452
1995		\$133,289	\$5,842	\$1,655,867
1994		\$118,922	\$199	\$1,528,420
1993		\$270,669	\$0	\$1,409,697
1992		\$131,413	\$0	\$1,139,028
1991		\$51,993	\$1,608	\$1,007,615
1990		\$207,078	\$7,201	\$957,230
1989		\$49,004	\$3,823	\$757,353
1988		\$25,065	\$172	\$712,172
1987		\$9,664	\$6,968	\$687,279
1986		\$35,686	\$896	\$684,583
1985		\$75,471	\$5,819	\$649,763
1984		\$4,604	\$3,998	\$660,131
1983		\$39,828	\$78	\$579,525
1982		\$48,652	\$0	\$539,775
1981		\$79,179	\$71	\$491,123
1980		\$46,085	\$13,388	\$412,015
1979		\$8,197	\$0	\$379,318
1978		\$28,154	\$216	\$371,121
1977		\$37,280	\$0	\$343,183
1976		\$51,203	\$138	\$305,903
1975		\$31,345	\$0	\$254,838
1974		\$53,663	\$352	\$223,493

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Act/Yr	Additions	Retirements	Ending Balance
1973	\$60,340	\$679	\$170,182
1972	\$27,833	\$104	\$110,621
1971	\$37,062	\$83	\$82,792
1970	\$30,547	\$34	\$45,813
1969	\$3,136	\$0	\$15,300
1968	\$820	\$0	\$12,164
1967	\$6,556	\$0	\$11,344
1966	\$4,153	\$237	\$4,788
1965	\$0	\$0	\$872
1964	\$0	\$0	\$872
1963	\$0	\$0	\$872
1962	\$0	\$0	\$872
1961	\$0	\$0	\$872
1960	\$0	\$0	\$872
1959	\$0	\$0	\$872
1958	\$0	\$0	\$872
1957	\$0	\$0	\$872
1956	\$0	\$0	\$872
1955	\$0	\$0	\$872
1954	\$0	\$0	\$872
1953	\$0	\$0	\$872
1952	\$0	\$0	\$872
1951	\$0	\$18	\$872
1950	\$0	\$0	\$890
1949	\$0	\$0	\$890
1948	\$0	\$78	\$890
1947	\$55	\$259	\$968
1946	\$0	\$107	\$1,172
1945	\$0	\$389	\$1,279
1944	\$0	\$122	\$1,668
1943	\$0	\$14	\$1,790
1942	\$144	\$0	\$1,804
1941	\$0	\$0	\$1,660
1940	\$77	\$115	\$1,660
1939	\$315	\$0	\$1,698

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10/20/2009	Act'g	Additions	Retirements	Ending Balance		
1938		\$0	\$0	\$1,383	\$0	\$0
1937		\$0	\$0	\$1,383	\$0	\$0
1936		\$1,383	\$0	\$1,383	\$0	\$0

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KENTUCKY POWER COMPANY
 Depreciation Study as of December 31, 2008
 Distribution Plant

Account	<u>367 UNDERGROUND CONDUCTOR & DEVICES</u>	
Depreciable Balance	\$7,652,121	
	<u>Current</u>	<u>Recommended</u>
Average Service Life (Yrs)	44	50
Iowa Curve	R1.0	S-.5
Gross Removal, %		0%
Gross Salvage, %		0%
Net Salvage %	0%	0%

 As in the related underground conduit account, the simulation analyses indicates an increase in average, although the increase is not as dramatic. Based on the analyses, the recommendation is to move to a 50 year average service life following an S-.5 type dispersion.

The recommendation of 0% for both salvage and removal is based on the fact that the conductor may be abandoned in place. If the conductor is removed, it may be likely that the scrap price would be equal to the cost of removal.

Simulated Plant Record Analysis
 Kentucky Power - Distr

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Account: KEPCo 101/6 367 - KY
 Version: KEPCO DISTRIBUTION 2008
 Method: Simulated Balances

No. of Test Points: 40 Interval: 0 Observation Band: 1969 - 2008

Dispersion	Avg Service Life	Sum of Squared Differences	Index of Variation	Conformance Index	Retirement Experience Index
S-.5	49.6	1.19E+10	7.1041	140.76	76.77
R1	43.0	1.21E+10	7.1537	139.79	94.11
R0.5	51.8	1.24E+10	7.2383	138.15	73.74
L0	54.8	1.26E+10	7.2917	137.14	71.23
L0.5	47.1	1.64E+10	8.3340	119.99	81.60
R1.5	37.7	1.77E+10	8.6522	115.58	99.80
S0	40.7	1.96E+10	9.1087	109.79	95.53
L1	41.3	2.81E+10	10.8986	91.75	90.54
S0.5	36.8	3.23E+10	11.6972	85.49	99.93
R2	34.1	3.89E+10	12.8274	77.96	100.00
L1.5	37.7	4.61E+10	13.9653	71.61	95.71
S1	33.9	5.73E+10	15.5764	64.20	100.00
R2.5	31.7	7.47E+10	17.7842	56.23	100.00
L2	34.4	8.02E+10	18.4262	54.27	98.86
S1.5	32.4	8.62E+10	19.0977	52.36	100.00
S2	30.7	1.29E+11	23.3729	42.78	100.00
R3	30.3	1.36E+11	23.9983	41.67	100.00
L3	31.1	1.50E+11	26.0489	38.39	100.00
S3	29.3	2.20E+11	30.5292	32.76	100.00
L4	29.0	2.67E+11	33.6344	29.73	100.00
R4	28.7	2.68E+11	33.6871	29.68	100.00
S4	28.3	3.45E+11	38.2156	26.17	100.00
L5	28.3	3.79E+11	40.0704	24.96	100.00
R5	28.0	4.17E+11	42.0333	23.79	100.00
S5	27.9	4.50E+11	43.6313	22.92	100.00
S6	27.4	5.16E+11	46.7445	21.39	100.00
SQ	29.9	9.82E+11	64.4743	15.51	100.00

Simulated Plant Record Analysis
 Kentucky Power - Distr

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Account: KEPCo 101/6 367 - KY
 Version: KEPCO DISTRIBUTION 2008
 Method: Simulated Balances

No. of Test Points: 20 Interval: 0 Observation Band: 1989 - 2008

Dispersion	Avg Service Life	Sum of Squared Differences	Index of Variation	Conformance Index	Retirement Experience Index
R0.5	51.8	1.10E+10	5.8400	171.23	73.85
S-.5	49.6	1.13E+10	5.9078	169.27	76.77
R1	43.0	1.15E+10	5.9602	167.78	94.20
L0	55.0	1.20E+10	6.0837	164.37	71.00
L0.5	47.3	1.48E+10	6.7608	147.91	81.38
R1.5	37.7	1.68E+10	7.2030	138.83	99.81
S0	40.7	1.71E+10	7.2767	137.42	95.53
L1	41.5	2.28E+10	8.3860	119.25	90.35
S0.5	37.2	2.67E+10	9.0785	110.15	99.82
R2	34.1	3.43E+10	10.2968	97.12	100.00
L1.5	37.5	3.70E+10	10.6881	93.56	95.90
S1	33.9	4.54E+10	11.8378	84.48	100.00
L2	34.6	6.19E+10	13.8245	72.34	98.81
R2.5	32.0	6.51E+10	14.1815	70.51	100.00
S1.5	32.4	6.82E+10	14.5116	68.91	100.00
S2	31.0	1.02E+11	17.7646	56.29	100.00
R3	30.4	1.16E+11	18.9691	52.72	100.00
L3	31.3	1.29E+11	19.9334	50.17	100.00
S3	29.4	1.81E+11	23.6775	42.23	100.00
L4	29.1	2.24E+11	26.3133	38.00	100.00
R4	28.9	2.31E+11	26.7094	37.44	100.00
S4	28.4	2.97E+11	30.2775	33.03	100.00
L5	28.1	3.28E+11	31.8485	31.40	100.00
R5	27.9	3.67E+11	33.6838	29.69	100.00
S5	27.7	3.98E+11	35.0834	28.50	100.00
S6	27.5	4.64E+11	37.8562	26.42	100.00
SQ	30.0	9.30E+11	53.5918	18.66	100.00

Simulated Plant Record Analysis
 Kentucky Power - Distr

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Account: KEPCo 101/6 367 - KY
 Version: KEPCO DISTRIBUTION 2008
 Method: Simulated Balances

No. of Test Points: 10 Interval: 0 Observation Band: 1999 - 2008

Dispersion	Avg Service Life	Sum of Squared Differences	Index of Variation	Conformance Index	Retirement Experience Index
R1.5	38.1	5.39E+09	4.3288	231.01	99.71
S0	41.1	5.73E+09	4.4654	223.94	94.91
L1	42.2	5.78E+09	4.4826	223.08	89.57
L0.5	47.6	5.91E+09	4.5323	220.64	81.03
R1	43.4	5.93E+09	4.5417	220.18	93.45
S0.5	37.5	6.02E+09	4.5772	218.47	99.67
L0	55.4	6.53E+09	4.7669	209.78	70.66
S-.5	49.6	6.54E+09	4.7685	209.71	76.77
R0.5	51.8	7.12E+09	4.9780	200.88	73.77
L1.5	38.1	7.13E+09	4.9813	200.75	95.39
R2	34.4	7.37E+09	5.0619	197.55	100.00
S1	34.6	8.09E+09	5.3041	188.53	100.00
L2	35.1	9.96E+09	5.8661	169.89	98.55
S1.5	32.7	1.19E+10	6.4215	155.73	100.00
R2.5	32.4	1.32E+10	6.7710	147.69	100.00
S2	31.3	1.74E+10	7.7796	128.54	100.00
L3	31.8	1.92E+10	8.1700	122.40	100.00
R3	30.6	2.38E+10	9.1067	109.81	100.00
S3	29.9	3.09E+10	10.3749	96.39	100.00
L4	29.6	3.53E+10	11.0842	90.22	100.00
R4	29.3	4.82E+10	12.9491	77.23	100.00
L5	28.8	5.03E+10	13.2259	75.61	100.00
S4	28.9	5.12E+10	13.3404	74.96	100.00
S6	28.3	6.33E+10	14.8384	67.39	100.00
S5	28.4	6.39E+10	14.9032	67.10	100.00
R5	28.5	6.71E+10	15.2791	65.45	100.00
SQ	30.2	3.31E+11	33.9287	29.47	100.00

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Act.Yr	Additions	Retirements	Ending Balance
2006	\$578,819	\$53,234	\$7,652,121
2007	\$973,386	\$36,512	\$7,126,536
2006	\$784,947	\$144,643	\$6,189,662
2005	\$104,018	\$36,728	\$5,549,358
2004	\$811,825	\$37,052	\$5,482,068
2003	\$245,976	\$23,089	\$4,707,295
2002	\$150,681	\$71,261	\$4,484,408
2001	\$293,525	\$11,194	\$4,404,988
2000	\$259,570	\$36,661	\$4,122,657
1999	\$377,491	\$11,656	\$3,899,748
1998	\$147,054	\$16,729	\$3,533,913
1997	\$339,985	\$46,345	\$3,403,588
1996	\$190,902	\$37,421	\$3,109,948
1995	\$209,851	\$19,071	\$2,956,467
1994	\$177,719	\$18,365	\$2,765,687
1993	\$285,294	\$9,042	\$2,606,333
1992	\$155,416	\$69,723	\$2,330,081
1991	\$141,320	\$19,317	\$2,244,388
1990	\$367,094	\$11,675	\$2,122,385
1989	\$177,298	\$8,169	\$1,766,966
1988	\$78,161	\$12,299	\$1,657,937
1987	\$108,890	\$20,306	\$1,591,975
1986	\$79,589	\$8,069	\$1,503,391
1985	\$119,906	\$6,814	\$1,431,571
1984	\$21,545	\$1,761	\$1,317,779
1983	\$100,965	\$8,742	\$1,287,995
1982	\$263,053	\$5,334	\$1,205,772
1981	\$112,466	\$6,587	\$948,053
1980	\$86,392	\$18,792	\$842,274
1979	\$45,415	\$8,720	\$774,674
1978	\$83,270	\$175	\$737,979
1977	\$52,882	\$3,175	\$654,884
1976	\$67,240	\$2,083	\$605,177
1975	\$23,860	\$1,477	\$540,020
1974	\$76,050	\$2,226	\$517,637

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Ac.Yr.	Additions	Retirements	Ending Balance
1973	\$137,903	\$8,385	\$443,813
1972	\$109,531	\$60	\$314,295
1971	\$86,370	\$0	\$204,824
1970	\$76,458	\$927	\$118,454
1969	\$11,767	\$0	\$42,923
1968	\$4,973	\$0	\$31,156
1967	\$15,264	\$0	\$26,183
1966	\$4,745	\$60	\$10,319
1965	\$2,102	\$0	\$6,234
1964	\$0	\$0	\$4,132
1963	\$1,638	\$0	\$4,132
1962	\$0	\$0	\$2,494
1961	\$0	\$0	\$2,494
1960	\$0	\$0	\$2,494
1959	\$0	\$0	\$2,494
1958	\$0	\$0	\$2,494
1957	\$474	\$58	\$2,494
1956	\$0	\$0	\$2,078
1955	\$0	\$0	\$2,078
1954	\$0	\$0	\$2,078
1953	\$0	\$0	\$2,078
1952	\$0	\$0	\$2,078
1951	\$0	\$513	\$2,078
1950	\$0	\$0	\$2,591
1949	\$0	\$0	\$2,591
1948	\$0	\$26	\$2,591
1947	\$563	\$48	\$2,617
1946	\$0	\$39	\$2,122
1945	\$0	\$851	\$2,161
1944	\$0	\$116	\$3,012
1943	\$0	\$11	\$3,128
1942	\$306	\$0	\$3,139
1941	\$0	\$0	\$2,832
1940	\$198	\$563	\$2,833
1939	\$1,515	\$0	\$3,198

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Acct Yr	Additions	Retirements	Ending Balance
1938	\$0	\$0	\$1,683
1937	\$0	\$0	\$1,683
1936	\$1,683	\$0	\$1,683

\$0
\$0
\$0

\$0
\$0
\$0

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KENTUCKY POWER COMPANY
 Depreciation Study as of December 31, 2008
 Distribution Plant

Account	<u>368 LINE TRANSFORMERS</u>	
Depreciable Balance	\$98,415,053	
	<u>Current</u>	<u>Recommended</u>
Average Service Life (Yrs)	25	30
Iowa Curve	R1.5	R0.5
Gross Removal, %		10%
Gross Salvage, %		35%
Net Salvage %	15%	25%

The results of the simulation analyses for the investment in this account indicate a slight increase in the average service life. Based on the analyses of all bands, the recommendation is to move to a 30 year average service life following an R0.5 type dispersion.

Labor, equipment and transportation costs will result in a cost of removal for the investments in this account. The reuse of materials and scrap sales would be expected to result in salvage received.

Simulated Plant Record Analysis
 Kentucky Power - Distr

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Account: KEPCo 101/G 368 - KY
 Version: KEPCO DISTRIBUTION 2008
 Method: Simulated Balances

No. of Test Points: 40 Interval: 0 Observation Band: 1969 - 2008

Dispersion	Avg Service Life	Sum of Squared Differences	Index of Variation	Conformance Index	Retirement Experience Index
R0.5	30.1	4.72E+13	21.8580	45.75	100.00
L0	32.9	5.41E+13	23.4099	42.72	95.40
S-.5	30.0	5.72E+13	24.0647	41.55	100.00
R1	28.0	6.85E+13	26.3301	37.98	100.00
L0.5	30.7	7.71E+13	27.9431	35.79	98.17
S0	28.2	9.31E+13	30.6943	32.58	100.00
R1.5	27.1	9.70E+13	31.3406	31.91	100.00
L1	29.0	1.07E+14	32.9706	30.33	99.66
S0.5	27.3	1.21E+14	34.9733	28.59	100.00
R2	25.9	1.38E+14	37.3784	26.75	100.00
L1.5	28.0	1.41E+14	37.7457	26.49	99.91
S1	26.3	1.57E+14	39.8194	25.11	100.00
L2	26.7	1.82E+14	42.9118	23.30	100.00
R2.5	25.2	1.95E+14	43.2610	23.12	100.00
S1.5	25.6	1.90E+14	43.8568	22.80	100.00
S2	25.0	2.32E+14	48.4146	20.65	100.00
R3	24.8	2.43E+14	49.5566	20.18	100.00
L3	25.4	2.59E+14	51.1628	19.55	100.00
S3	24.4	3.08E+14	55.8030	17.92	100.00
L4	24.3	3.45E+14	59.0680	16.93	100.00
R4	24.2	3.47E+14	59.2796	16.87	100.00
S4	24.0	4.01E+14	63.7388	15.69	100.00
L5	23.9	4.27E+14	65.7758	15.20	100.00
R5	23.8	4.57E+14	67.9926	14.71	100.00
S5	23.7	4.80E+14	69.6686	14.35	100.00
S6	23.5	5.31E+14	73.3343	13.64	100.00
SQ	25.1	7.70E+14	88.3045	11.32	100.00

Simulated Plant Record Analysis
 Kentucky Power - Distr

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Account: KEPCo 101/6 368 - KY
 Version: KEPCO DISTRIBUTION 2008
 Method: Simulated Balances

No. of Test Points: 20 Interval: 0 Observation Band: 1989 - 2008

Dispersion	Avg Service Life	Sum of Squared Differences	Index of Variation	Conformance Index	Retirement Experience Index
R0.5	30.1	4.25E+13	19.8800	50.30	100.00
L0	32.9	4.73E+13	20.9746	47.68	95.40
S-.5	30.0	5.09E+13	21.7532	45.97	100.00
R1	28.3	6.13E+13	23.8870	41.86	100.00
L0.5	31.0	6.62E+13	24.8148	40.30	98.01
S0	28.2	8.02E+13	27.3158	36.61	100.00
R1.5	27.1	8.70E+13	28.4565	35.14	100.00
L1	29.1	9.13E+13	29.1422	34.31	99.63
S0.5	27.3	1.04E+14	31.1130	32.14	100.00
L1.5	28.1	1.20E+14	33.4436	29.90	99.90
R2	26.1	1.24E+14	33.9875	29.42	100.00
S1	26.3	1.36E+14	35.5583	28.12	100.00
L2	26.9	1.57E+14	38.1728	26.20	100.00
S1.5	25.9	1.67E+14	39.4519	25.35	100.00
R2.5	25.5	1.68E+14	39.5114	25.31	100.00
S2	25.3	2.05E+14	43.6400	22.91	100.00
R3	24.8	2.22E+14	45.4630	22.00	100.00
L3	25.4	2.29E+14	46.1121	21.69	100.00
S3	24.6	2.79E+14	50.9738	19.62	100.00
L4	24.5	3.15E+14	54.0981	18.48	100.00
R4	24.2	3.21E+14	54.6798	18.29	100.00
S4	24.0	3.71E+14	58.7755	17.01	100.00
L5	23.9	3.97E+14	60.7880	16.45	100.00
R5	23.8	4.27E+14	63.0001	15.87	100.00
S5	23.9	4.49E+14	64.6387	15.47	100.00
S6	23.8	5.01E+14	68.2660	14.65	100.00
SQ	25.9	9.99E+14	96.4328	10.37	100.00

Simulated Plant Record Analysis
 Kentucky Power - Distr

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Account: KEPCo 101/G 368 - KY
 Version: KEPCO DISTRIBUTION 2008
 Method: Simulated Balances

No. of Test Points: 10 Interval: 0 Observation Band: 1999 - 2008

Dispersion	Avg Service Life	Sum of Squared Differences	Index of Variation	Conformance Index	Retirement Experience Index
R0.5	30.8	1.98E+13	16.5762	60.33	100.00
L0	33.8	2.10E+13	17.0841	58.53	94.68
S-5	30.8	2.23E+13	17.6038	56.81	100.00
R1	28.7	2.74E+13	19.4928	51.30	100.00
L0.5	31.7	2.76E+13	19.5559	51.14	97.56
S0	28.9	3.31E+13	21.4261	46.67	100.00
L1	30.1	3.61E+13	22.3654	44.71	99.37
R1.5	27.7	3.74E+13	22.7689	43.92	100.00
S0.5	27.9	4.17E+13	24.0441	41.59	100.00
L1.5	28.8	4.53E+13	25.0708	39.89	99.83
R2	26.8	5.16E+13	26.7536	37.38	100.00
S1	27.2	5.27E+13	27.0431	36.98	100.00
L2	27.8	5.63E+13	27.9480	35.78	99.99
S1.5	26.6	6.36E+13	29.6980	33.67	100.00
R2.5	26.1	6.81E+13	30.7418	32.53	100.00
S2	25.9	7.66E+13	32.5946	30.68	100.00
L3	26.4	8.03E+13	33.3803	29.96	100.00
R3	25.4	8.84E+13	35.0164	28.56	100.00
S3	25.3	1.01E+14	37.4861	26.68	100.00
L4	25.2	1.13E+14	39.5789	25.27	100.00
R4	25.0	1.24E+14	41.4631	24.12	100.00
S4	24.9	1.35E+14	43.2115	23.14	100.00
L6	24.9	1.46E+14	44.9528	22.25	100.00
R5	24.7	1.63E+14	47.5617	21.03	100.00
S5	24.5	1.69E+14	48.4435	20.64	100.00
S6	24.4	1.99E+14	52.5040	19.05	100.00
SQ	26.0	4.25E+14	76.7513	13.03	100.00

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Act.Yr.	Additions	Retirements	Ending Balance
2008	\$7,450,618	\$2,310,335	\$98,415,054
2007	\$7,254,032	\$2,367,716	\$93,274,771
2006	\$4,661,413	\$1,756,227	\$88,388,455
2005	\$2,488,476	\$1,190,629	\$85,483,269
2004	\$2,607,713	\$1,076,234	\$84,185,422
2003	\$1,347,430	\$1,073,924	\$82,653,943
2002	\$3,758,604	\$1,055,795	\$82,380,437
2001	\$2,996,046	\$1,029,459	\$79,677,628
2000	\$3,420,485	\$1,443,110	\$78,311,041
1999	\$4,458,378	\$1,278,242	\$76,333,666
1998	\$3,482,894	\$1,560,837	\$73,153,530
1997	\$4,777,388	\$2,186,374	\$71,231,473
1996	\$3,287,901	\$1,578,917	\$68,640,459
1995	\$4,198,526	\$1,313,309	\$66,931,475
1994	\$5,479,512	\$1,164,053	\$64,046,258
1993	\$4,268,443	\$1,105,536	\$69,730,799
1992	\$3,210,065	\$1,618,104	\$66,667,987
1991	\$3,837,537	\$1,219,271	\$64,976,023
1990	\$3,902,514	\$959,910	\$62,357,757
1989	\$3,776,952	\$1,161,193	\$49,415,153
1988	\$2,317,695	\$601,750	\$46,799,394
1987	\$3,159,121	\$784,243	\$45,083,449
1986	\$3,654,901	\$716,994	\$42,708,571
1985	\$2,911,382	\$640,462	\$39,768,664
1984	\$3,261,356	\$609,740	\$37,497,744
1983	\$2,530,599	\$816,897	\$34,746,128
1982	\$2,206,738	\$667,258	\$33,032,326
1981	\$2,989,960	\$1,160,266	\$31,492,846
1980	\$3,636,711	\$707,768	\$29,663,752
1979	\$2,852,002	\$411,317	\$26,734,809
1978	\$3,851,592	\$627,160	\$24,294,124
1977	\$3,541,256	\$312,212	\$21,069,692
1976	\$4,711,891	\$266,974	\$17,840,648
1975	\$1,610,300	\$253,830	\$16,394,731
1974	\$1,473,612	\$242,975	\$15,038,261

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Acct	Additions	Retirements	Ending Balance
1973	\$1,402,782	\$229,211	\$1,807,624
1972	\$1,089,601	\$396,582	\$1,263,453
1971	\$1,128,076	\$205,337	\$1,941,034
1970	\$954,361	\$193,411	\$1,018,295
1969	\$633,909	\$349,749	\$10,257,345
1968	\$994,850	\$191,068	\$9,973,185
1967	\$823,498	\$131,999	\$9,169,403
1966	\$699,015	\$131,560	\$8,477,904
1965	\$474,052	\$144,033	\$7,910,449
1964	\$376,312	\$67,553	\$7,550,430
1963	\$318,004	\$67,861	\$7,261,671
1962	\$290,851	\$71,202	\$7,011,528
1961	\$386,601	\$64,955	\$6,791,879
1960	\$377,379	\$69,198	\$6,470,233
1959	\$463,712	\$81,628	\$6,162,052
1958	\$493,518	\$64,683	\$5,779,968
1957	\$284,379	\$51,169	\$5,351,133
1956	\$694,523	\$48,821	\$5,117,923
1955	\$438,445	\$52,899	\$4,472,221
1954	\$265,710	\$32,894	\$4,086,675
1953	\$295,026	\$43,675	\$3,853,859
1952	\$222,457	\$24,126	\$3,602,508
1951	\$500,026	\$34,643	\$3,404,177
1950	\$463,556	\$56,812	\$2,938,794
1949	\$433,985	\$39,333	\$2,531,050
1948	\$489,204	\$27,858	\$2,136,398
1947	\$491,803	\$12,232	\$1,675,052
1946	\$332,267	\$10,975	\$1,195,481
1945	\$161,745	\$5,865	\$874,189
1944	\$30,578	\$7,340	\$718,309
1943	\$6,171	\$9,985	\$695,071
1942	\$25,547	\$505	\$698,885
1941	\$126,413	\$23,827	\$673,843
1940	\$83,745	\$28,729	\$571,257
1939	\$107,763	\$36,711	\$516,241

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10/20/2009	Act.Yr.	Additions	Retirements	Ending Balance
	1938	\$101,940	\$37,399	\$445,189
	1937	\$94,566	\$84,031	\$380,648
	1936	\$370,113	\$0	\$370,113
				\$0
				\$0
				\$0

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KENTUCKY POWER COMPANY
 Depreciation Study as of December 31, 2008
 Distribution Plant

Account	<u>369 SERVICES</u>	
Depreciable Balance	\$38,162,243	
	<u>Current</u>	<u>Recommended</u>
Average Service Life (Yrs)	18	25
Iowa Curve	R2.0	L0
Gross Removal, %		15%
Gross Salvage, %		0%
Net Salvage %	0%	-15%

 Based on the results of the simulation analyses for all the observation bands, the recommendation is to move to a 25 year average service life following an LO.0 type dispersion.

The removal and replacements of services will involve labor and equipment costs. No reuse or scrap value is expected.

Simulated Plant Record Analysis
 Kentucky Power - Distr

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Account: KEPCo 101/6 369 - KY
 Version: KEPCO DISTRIBUTION 2008
 Method: Simulated Balances

No. of Test Points: 40 Interval: 0 Observation Band: 1969 - 2008

Dispersion	Avg Service Life	Sum of Squared Differences	Index of Variation	Conformance Index	Retirement Experience Index
L0	25.1	1.68E+13	41.7244	23.97	99.59
S-.5	23.6	1.81E+13	43.2746	23.11	100.00
R0.5	23.6	1.82E+13	43.3900	23.05	100.00
L0.5	24.0	1.84E+13	43.6412	22.91	99.89
L1	23.0	2.00E+13	45.4951	21.98	100.00
S0	22.5	2.04E+13	45.9923	21.74	100.00
R1	22.6	2.09E+13	46.4943	21.51	100.00
L1.5	22.4	2.19E+13	47.6540	20.98	100.00
S0.5	22.0	2.26E+13	48.3238	20.69	100.00
R1.5	21.8	2.37E+13	49.5336	20.19	100.00
L2	21.6	2.38E+13	49.6046	20.16	100.00
S1	21.4	2.47E+13	50.5928	19.77	100.00
R2	21.2	2.65E+13	52.4096	19.08	100.00
S1.5	21.1	2.69E+13	52.7341	18.96	100.00
L3	20.9	2.80E+13	53.8430	18.57	100.00
S2	20.6	2.90E+13	54.7409	18.27	100.00
R2.5	20.9	2.91E+13	54.8389	18.24	100.00
R3	20.6	3.16E+13	57.1944	17.48	100.00
S3	20.3	3.24E+13	57.9267	17.26	100.00
L4	20.1	3.29E+13	58.3904	17.13	100.00
R4	20.1	3.49E+13	60.1391	16.63	100.00
S4	20.0	3.58E+13	60.9097	16.42	100.00
L5	19.8	3.63E+13	61.2561	16.32	100.00
R5	19.8	3.76E+13	62.4026	16.02	100.00
S5	19.9	3.81E+13	62.8057	15.92	100.00
S6	19.8	3.93E+13	63.8009	15.67	100.00
SQ	21.1	6.09E+13	79.3843	12.60	100.00

Simulated Plant Record Analysis
 Kentucky Power - Distr

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Account: KEPCo 101/6 369 - KY
 Version: KEPCO DISTRIBUTION 2008
 Method: Simulated Balances

No. of Test Points: 20 Interval: 0 Observation Band: 1989 - 2008

Dispersion	Avg Service Life	Sum of Squared Differences	Index of Variation	Conformance Index	Retirement Experience Index
L0	25.4	1.12E+13	31.9215	31.33	99.53
S-.5	23.8	1.19E+13	32.8255	30.46	100.00
L0.5	24.3	1.19E+13	32.8823	30.41	99.87
R0.5	23.9	1.23E+13	33.3600	29.98	100.00
L1	23.4	1.27E+13	33.8619	29.53	100.00
S0	22.8	1.32E+13	34.5762	28.92	100.00
L1.5	22.6	1.36E+13	35.1451	28.45	100.00
R1	22.8	1.43E+13	35.9567	27.81	100.00
S0.5	22.2	1.46E+13	36.3957	27.48	100.00
L2	22.0	1.46E+13	36.3978	27.47	100.00
S1	21.7	1.60E+13	38.1057	26.24	100.00
R1.5	22.2	1.64E+13	38.4907	25.98	100.00
L3	21.1	1.73E+13	39.5868	25.26	100.00
S1.5	21.3	1.75E+13	39.7727	25.14	100.00
R2	21.5	1.84E+13	40.8375	24.49	100.00
S2	21.0	1.88E+13	41.2758	24.23	100.00
R2.5	21.1	2.00E+13	42.5650	23.49	100.00
L4	20.5	2.10E+13	43.6618	22.90	100.00
S3	20.5	2.11E+13	43.7045	22.88	100.00
R3	20.8	2.15E+13	44.0989	22.68	100.00
S4	20.2	2.32E+13	45.8249	21.82	100.00
L5	20.2	2.32E+13	45.8488	21.81	100.00
R4	20.3	2.33E+13	45.9600	21.76	100.00
S5	20.1	2.44E+13	47.0501	21.25	100.00
R5	20.2	2.45E+13	47.1259	21.22	100.00
S6	20.0	2.52E+13	47.7571	20.94	100.00
SQ	21.7	6.88E+13	78.9456	12.67	100.00

Simulated Plant Record Analysis
 Kentucky Power - Distr

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Account: KEPCo 101/6 369 - KY
 Version: KEPCO DISTRIBUTION 2008
 Method: Simulated Balances

No. of Test Points: 10 Interval: 0 Observation Band: 1999 - 2008

Dispersion	Avg Service Life	Sum of Squared Differences	Index of Variation	Conformance Index	Retirement Experience Index
L0	26.4	1.80E+12	13.9501	71.68	99.25
L0.5	25.3	1.83E+12	14.1034	70.90	99.78
L1	24.1	1.85E+12	14.1460	70.69	100.00
L2	22.7	1.88E+12	14.2785	70.04	100.00
L1.5	23.5	1.93E+12	14.4454	69.23	100.00
S-.5	24.6	1.94E+12	14.5108	68.91	100.00
L3	21.9	1.95E+12	14.5383	68.78	100.00
R0.5	24.6	2.06E+12	14.9569	66.86	100.00
S0	23.5	2.09E+12	15.0661	66.37	100.00
L4	21.4	2.15E+12	15.2774	65.46	100.00
L5	21.1	2.19E+12	15.3970	64.95	100.00
S0.5	22.9	2.22E+12	15.5220	64.42	100.00
S4	21.2	2.26E+12	15.6594	63.86	100.00
S5	21.1	2.30E+12	15.7814	63.37	100.00
S1	22.5	2.33E+12	15.9081	62.86	100.00
S6	21.0	2.34E+12	15.9283	62.78	100.00
S3	21.3	2.35E+12	15.9456	62.71	100.00
R5	21.0	2.37E+12	16.0151	62.44	100.00
R1	23.7	2.39E+12	16.0846	62.17	100.00
S1.5	22.2	2.39E+12	16.1100	62.07	100.00
S2	21.9	2.40E+12	16.1132	62.06	100.00
R4	21.3	2.54E+12	16.5934	60.26	100.00
R1.5	22.9	2.57E+12	16.6835	59.94	100.00
R3	21.7	2.66E+12	16.9955	58.84	100.00
R2	22.3	2.70E+12	17.1188	58.42	100.00
R2.5	22.0	2.71E+12	17.1441	58.33	100.00
SQ	22.9	3.04E+13	57.3850	17.43	100.00

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Acct Yr	Additions	Retirements	Ending Balance
2008	\$2,815,091	\$720,680	\$38,162,243
2007	\$2,552,906	\$887,176	\$36,057,832
2006	\$2,696,436	\$1,144,609	\$34,402,102
2005	\$2,370,702	\$760,371	\$32,850,275
2004	\$2,034,573	\$511,999	\$31,239,944
2003	\$2,678,347	\$630,850	\$29,717,370
2002	\$1,907,359	\$508,684	\$27,669,873
2001	\$1,931,126	\$390,080	\$26,271,198
2000	\$2,630,192	\$569,287	\$24,730,152
1999	\$2,508,736	\$344,502	\$22,619,247
1998	\$795,815	\$431,172	\$20,455,113
1997	\$2,636,990	\$522,610	\$20,090,470
1996	\$816,459	\$475,561	\$17,976,090
1995	\$1,107,925	\$497,449	\$17,635,192
1994	\$1,352,925	\$562,012	\$17,024,716
1993	\$1,656,956	\$696,650	\$16,233,803
1992	\$1,167,485	\$415,580	\$15,271,495
1991	\$1,236,345	\$456,573	\$14,519,590
1990	\$945,888	\$396,795	\$13,739,818
1989	\$1,182,480	\$374,943	\$13,190,725
1988	\$888,422	\$392,321	\$12,383,088
1987	\$931,227	\$429,089	\$11,886,987
1986	\$733,462	\$304,874	\$11,384,849
1985	\$712,353	\$281,524	\$10,956,261
1984	\$807,358	\$304,542	\$10,525,432
1983	\$969,567	\$319,764	\$10,022,616
1982	\$716,135	\$166,004	\$9,372,813
1981	\$668,594	\$281,371	\$8,822,682
1980	\$864,476	\$216,061	\$8,235,459
1979	\$711,506	\$322,670	\$7,587,044
1978	\$830,075	\$201,569	\$7,198,208
1977	\$723,397	\$177,138	\$6,569,702
1976	\$596,974	\$176,814	\$6,023,443
1975	\$524,332	\$168,457	\$5,603,263
1974	\$483,476	\$160,110	\$5,247,408

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Act/Yr Additions Retirements Ending Balance

1973	\$654,650	\$163,509	\$4,924,042	\$0
1972	\$683,325	\$158,801	\$4,432,901	\$0
1971	\$509,551	\$118,146	\$3,908,377	\$0
1970	\$423,419	\$108,673	\$3,616,972	\$0
1969	\$373,867	\$126,343	\$3,202,226	\$0
1968	\$328,382	\$128,889	\$2,954,702	\$0
1967	\$299,067	\$97,914	\$2,755,209	\$0
1966	\$231,692	\$101,048	\$2,554,056	\$0
1965	\$186,261	\$91,455	\$2,423,412	\$0
1964	\$161,204	\$84,465	\$2,328,606	\$0
1963	\$125,832	\$91,492	\$2,251,867	\$0
1962	\$128,946	\$70,456	\$2,207,527	\$0
1961	\$166,728	\$71,168	\$2,149,037	\$0
1960	\$142,251	\$71,016	\$2,053,477	\$0
1959	\$148,227	\$65,607	\$1,982,242	\$0
1958	\$169,015	\$72,705	\$1,899,622	\$0
1957	\$144,373	\$61,021	\$1,803,312	\$0
1956	\$136,713	\$54,615	\$1,719,960	\$0
1955	\$113,139	\$50,921	\$1,637,862	\$0
1954	\$115,530	\$47,791	\$1,575,644	\$0
1953	\$124,065	\$43,728	\$1,507,905	\$0
1952	\$128,566	\$36,275	\$1,427,568	\$0
1951	\$139,333	\$35,506	\$1,335,277	\$0
1950	\$161,544	\$24,246	\$1,230,950	\$0
1949	\$219,751	\$29,813	\$1,093,652	\$0
1948	\$243,279	\$16,194	\$903,714	\$0
1947	\$218,255	\$11,858	\$676,529	\$0
1946	\$112,216	\$6,923	\$470,232	\$0
1945	\$39,254	\$4,137	\$364,939	\$0
1944	\$14,444	\$3,671	\$329,822	\$0
1943	\$11,021	\$8,861	\$319,049	\$0
1942	\$29,900	\$971	\$316,889	\$0
1941	\$25,996	\$10,956	\$287,960	\$0
1940	\$54,016	\$15,722	\$272,920	\$0
1939	\$45,804	\$12,835	\$234,526	\$0

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10/20/2009		Act. Yr.	Additions	Retirements	Ending Balance
1938	\$46,593	\$14,239	\$201,657	\$0	\$0
1937	\$37,203	\$11,112	\$169,303	\$0	\$0
1936	\$143,212	\$0	\$143,212	\$0	\$0

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KENTUCKY POWER COMPANY
 Depreciation Study as of December 31, 2008
 Distribution Plant

Account	<u>370 METERS</u>	
Depreciable Balance	\$22,962,067	
	<u>Current</u>	<u>Recommended</u>
Average Service Life (Yrs)	27	17
Iowa Curve	R0.5	S6.0
Gross Removal, %		10%
Gross Salvage, %		2%
Net Salvage %	0%	-8%

 The results of the simulation analyses for the investment in this account point to a shortening of the average service life. Based on the analyses, the recommendation is to move to a 17 year average service life following an S6.0 type retirement dispersion as indicated in both the 40 year and 20 year band analyses.

Labor and transportation costs will be incurred in the removal of the meters. A minimal amount of scrap value may be obtained.

Simulated Plant Record Analysis
 Kentucky Power - Distr

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Account: KEPCo 101/6 370 - KY
 Version: KEPCO DISTRIBUTION 2008
 Method: Simulated Balances

No. of Test Points: 40 Interval: 0 Observation Band: 1969 - 2008

Dispersion	Avg Service Life	Sum of Squared Differences	Index of Variation	Conformance Index	Retirement Experience Index
S6	16.9	4.74E+14	234.4046	4.27	100.00
S5	17.0	4.76E+14	235.3818	4.25	100.00
R5	16.9	4.80E+14	235.7537	4.24	100.00
L5	17.0	4.84E+14	236.8425	4.22	100.00
S4	16.9	4.85E+14	237.1622	4.22	100.00
R4	17.0	4.89E+14	238.0943	4.20	100.00
L4	17.1	4.98E+14	240.2378	4.16	100.00
SQ	18.2	4.98E+14	240.2643	4.16	100.00
S3	17.0	5.00E+14	240.6232	4.16	100.00
R3	17.0	5.03E+14	241.4064	4.14	100.00
R2.5	17.0	5.13E+14	243.8979	4.10	100.00
S2	17.1	5.19E+14	245.2971	4.08	100.00
R2	17.1	5.26E+14	246.7887	4.05	100.00
L3	17.1	5.28E+14	247.4611	4.04	100.00
S1.5	17.2	5.33E+14	248.5863	4.02	100.00
R1.5	17.2	5.41E+14	250.3929	3.99	100.00
S1	17.1	5.49E+14	252.1514	3.97	100.00
R1	17.3	5.59E+14	254.5650	3.93	100.00
L2	17.6	5.63E+14	255.5268	3.91	100.00
S0.5	17.4	5.64E+14	255.7180	3.91	100.00
L1.5	17.7	5.80E+14	259.3025	3.86	100.00
S0	17.4	5.82E+14	259.6932	3.85	100.00
R0.5	17.6	5.86E+14	260.5791	3.84	100.00
S-.5	17.7	5.97E+14	263.0474	3.80	100.00
L1	17.9	5.99E+14	263.4576	3.80	100.00
L0.5	18.4	6.13E+14	266.5306	3.75	100.00
L0	18.9	6.29E+14	269.9156	3.70	100.00

Simulated Plant Record Analysis
 Kentucky Power - Distr

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Account: KEPCo 101/6 370 - KY
 Version: KEPCO DISTRIBUTION 2008
 Method: Simulated Balances

No. of Test Points: 20 Interval: 0 Observation Band: 1989 - 2008

Dispersion	Avg Service Life	Sum of Squared Differences	Index of Variation	Conformance Index	Retirement Experience Index
S6	16.9	4.58E+14	228.6109	4.37	100.00
S5	16.8	4.62E+14	229.4931	4.36	100.00
R5	16.8	4.63E+14	229.8526	4.35	100.00
L5	16.8	4.68E+14	230.9681	4.33	100.00
S4	16.9	4.69E+14	231.2329	4.32	100.00
R4	16.9	4.71E+14	231.9272	4.31	100.00
L4	16.9	4.81E+14	234.2141	4.27	100.00
S3	16.8	4.82E+14	234.4693	4.26	100.00
R3	16.8	4.83E+14	234.7333	4.26	100.00
SQ	18.2	4.86E+14	235.5782	4.24	100.00
R2.5	16.9	4.91E+14	236.7002	4.22	100.00
S2	16.9	5.00E+14	238.7483	4.19	100.00
R2	16.8	5.01E+14	238.9892	4.18	100.00
L3	17.0	5.10E+14	241.2251	4.15	100.00
S1.5	16.8	5.12E+14	241.6659	4.14	100.00
R1.5	16.9	5.12E+14	241.7463	4.14	100.00
S1	16.9	5.25E+14	244.7635	4.09	100.00
R1	17.0	5.26E+14	244.9701	4.08	100.00
S0.5	17.0	5.38E+14	247.6522	4.04	100.00
L2	17.2	5.42E+14	248.7798	4.02	100.00
R0.5	17.2	5.48E+14	249.9897	4.00	100.00
S0	17.1	5.52E+14	250.8797	3.99	100.00
L1.5	17.5	5.57E+14	251.9986	3.97	100.00
S-.5	17.2	5.61E+14	252.9295	3.95	100.00
L1	17.6	5.72E+14	255.5763	3.91	100.00
L0.5	18.0	5.83E+14	258.0198	3.88	100.00
L0	18.3	5.96E+14	260.7674	3.83	100.00

Simulated Plant Record Analysis
 Kentucky Power - Distr

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Account: KEPCo 101/S 370 - KY
 Division: KEPCO DISTRIBUTION 2008
 Method: Simulated Balances

No. of Test Points: 10 Interval: 0 Observation Band: 1999 - 2008

Dispersion	Avg Service Life	Sum of Squared Differences	Index of Variation	Conformance Index	Retirement Experience Index
R0.5	15.7	4.29E+14	292.8819	3.41	100.00
R1	15.6	4.30E+14	293.3488	3.41	100.00
R1.5	15.7	4.33E+14	294.4440	3.40	100.00
R2	15.8	4.37E+14	295.5392	3.38	100.00
S6	16.2	4.38E+14	296.1187	3.38	100.00
R2.5	15.9	4.39E+14	296.1798	3.38	100.00
S-.5	15.6	4.39E+14	296.2908	3.38	100.00
S5	16.1	4.39E+14	296.3114	3.37	100.00
R6	16.1	4.39E+14	296.3614	3.37	100.00
R3	16.0	4.40E+14	296.7793	3.37	100.00
R4	16.0	4.40E+14	296.8139	3.37	100.00
S4	16.2	4.41E+14	296.9180	3.37	100.00
L5	16.1	4.41E+14	297.0000	3.37	100.00
SQ	17.3	4.44E+14	298.0337	3.36	100.00
S3	16.1	4.44E+14	298.0448	3.36	100.00
L4	16.0	4.45E+14	298.3521	3.35	100.00
S2	15.9	4.48E+14	299.4942	3.34	100.00
S0	15.7	4.51E+14	300.2361	3.33	100.00
S1.5	15.8	4.51E+14	300.2998	3.33	100.00
S0.5	15.8	4.52E+14	300.6594	3.33	100.00
S1	15.7	4.53E+14	301.0741	3.32	100.00
L3	16.0	4.56E+14	302.0115	3.31	100.00
L0	16.1	4.62E+14	303.8610	3.29	100.00
L0.5	16.0	4.64E+14	304.6868	3.28	100.00
L2	15.9	4.66E+14	305.1628	3.28	100.00
L1.5	15.8	4.66E+14	305.4216	3.27	100.00
L1	15.9	4.67E+14	305.7060	3.27	100.00

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Act Yr	Additions	Retirements	Ending Balance
2008	\$2,963,121	\$1,023,534	\$22,962,066
2007	\$2,353,738	\$9,974,912	\$21,022,479
2006	\$14,223,681	\$9,319,669	\$28,643,653
2005	\$4,183,747	\$1,515,899	\$23,739,641
2004	\$1,006,674	\$832,607	\$21,071,793
2003	\$617,066	\$624,632	\$20,897,726
2002	\$489,075	\$970,185	\$20,905,292
2001	\$648,901	\$639,511	\$21,385,402
2000	\$1,514,864	\$1,709,961	\$21,377,012
1999	\$980,778	\$979,544	\$21,572,109
1998	\$1,324,431	\$723,727	\$21,570,875
1997	\$1,105,728	\$836,156	\$20,970,171
1996	\$669,427	\$817,207	\$20,700,599
1995	\$850,393	\$631,063	\$20,548,379
1994	\$1,413,819	\$576,545	\$20,329,049
1993	\$1,029,446	\$502,234	\$19,491,775
1992	\$999,844	\$381,788	\$18,964,563
1991	\$1,093,280	\$293,127	\$18,346,507
1990	\$1,278,153	\$363,340	\$17,546,354
1989	\$1,133,142	\$320,905	\$16,631,541
1988	\$1,252,548	\$409,799	\$15,819,304
1987	\$1,107,129	\$373,822	\$14,966,555
1986	\$1,253,695	\$350,900	\$14,233,248
1985	\$1,086,299	\$388,485	\$13,330,453
1984	\$1,266,454	\$385,107	\$12,632,639
1983	\$1,584,355	\$279,281	\$11,751,292
1982	\$1,226,850	\$248,786	\$10,446,218
1981	\$1,149,365	\$261,646	\$9,468,154
1980	\$890,564	\$217,875	\$8,580,435
1979	\$814,814	\$196,583	\$7,907,746
1978	\$925,839	\$174,912	\$7,289,515
1977	\$940,534	\$249,384	\$6,537,588
1976	\$667,327	\$144,244	\$5,846,438
1975	\$497,286	\$105,836	\$5,323,355
1974	\$480,510	\$105,229	\$4,931,905

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Act/Yr	Additions	Retirements	Ending Balance
1973	\$423,051	\$70,531	\$4,556,624
1972	\$371,979	\$61,436	\$4,204,104
1971	\$279,535	\$60,702	\$3,893,561
1970	\$255,663	\$51,994	\$3,674,728
1969	\$205,326	\$114,258	\$3,471,059
1968	\$181,449	\$84,855	\$3,379,991
1967	\$181,316	\$37,032	\$3,283,397
1966	\$145,871	\$55,662	\$3,139,143
1965	\$209,404	\$56,012	\$3,048,904
1964	\$184,491	\$72,716	\$2,895,512
1963	\$169,199	\$68,235	\$2,783,736
1962	\$139,771	\$47,026	\$2,682,772
1961	\$122,140	\$44,649	\$2,590,027
1960	\$128,169	\$41,245	\$2,512,536
1959	\$166,474	\$47,096	\$2,425,512
1958	\$131,604	\$40,319	\$2,316,234
1957	\$153,490	\$46,355	\$2,224,949
1956	\$128,652	\$31,269	\$2,117,814
1955	\$118,059	\$31,785	\$2,020,431
1954	\$81,155	\$31,742	\$1,934,157
1953	\$119,866	\$34,715	\$1,884,744
1952	\$94,922	\$32,524	\$1,799,593
1951	\$155,600	\$36,312	\$1,737,195
1950	\$177,105	\$31,485	\$1,617,907
1949	\$195,423	\$35,189	\$1,472,287
1948	\$260,771	\$12,529	\$1,312,053
1947	\$271,471	\$12,466	\$1,063,811
1946	\$139,564	\$8,366	\$804,806
1945	\$60,653	\$9,191	\$673,618
1944	\$25,218	\$4,542	\$622,156
1943	\$10,056	\$9,581	\$601,480
1942	\$18,454	\$460	\$601,005
1941	\$84,476	\$19,344	\$663,011
1940	\$59,490	\$13,467	\$517,879
1939	\$46,100	\$15,560	\$471,856

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Act Yr	Additions	Retirements	Ending Balance
1938	\$52,663	\$14,262	\$439,316
1937	\$50,591	\$20,604	\$400,915
1936	\$370,928	\$0	\$370,928
			\$0
			\$0
			\$0

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KENTUCKY POWER COMPANY
 Depreciation Study as of December 31, 2008
 Distribution Plant

Account	<u>371 INSTALLATIONS ON CUSTOMERS PREMISES</u>	
Depreciable Balance	\$18,001,253	
	<u>Current</u>	<u>Recommended</u>
Average Service Life (Yrs)	11	14
Iowa Curve	L.O.O	R0.5
Gross Removal, %		20%
Gross Salvage, %		5%
Net Salvage %	30%	-15%

The simulation analyses of the 40 and 20 year bands indicate an R0.5 type dispersion is appropriate for the investments in this account. The resultant average service life is 14 years.

Labor and equipment costs will result in removal costs being incurred for the retirement of this investment. A minimum amount of scrap value may result in some salvage.

Simulated Plant Record Analysis
 Kentucky Power - Distr

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Account: KEPCo 101/6 371 - KY
 Version: KEPCO DISTRIBUTION 2008
 Method: Simulated Balances

No. of Test Points: 40 Interval: 0 Observation Band: 1969 - 2008

Dispersion	Avg Service Life	Sum of Squared Differences	Index of Variation	Conformance Index	Retirement Experience Index
R0.5	13.5	9.47E+12	80.3693	12.44	100.00
L0	14.2	9.55E+12	80.7068	12.39	100.00
S-.5	13.4	9.55E+12	80.7306	12.39	100.00
L0.5	13.8	9.95E+12	82.3701	12.14	100.00
R1	13.0	1.01E+13	82.9905	12.05	100.00
S0	13.0	1.02E+13	83.5687	11.97	100.00
L1	13.3	1.04E+13	84.0400	11.90	100.00
R1.5	12.7	1.07E+13	85.5805	11.68	100.00
S0.5	12.8	1.08E+13	85.7979	11.66	100.00
L1.5	12.9	1.09E+13	86.0865	11.62	100.00
S1	12.5	1.13E+13	87.9345	11.37	100.00
L2	12.6	1.14E+13	88.1986	11.34	100.00
R2	12.5	1.14E+13	88.3663	11.32	100.00
S1.5	12.3	1.19E+13	89.9393	11.12	100.00
R2.5	12.3	1.21E+13	90.8543	11.01	100.00
S2	12.1	1.24E+13	92.0207	10.87	100.00
L3	12.2	1.25E+13	92.4725	10.81	100.00
R3	12.1	1.28E+13	93.4063	10.71	100.00
S3	11.9	1.34E+13	95.5014	10.47	100.00
L4	11.9	1.38E+13	96.8893	10.32	100.00
R4	11.9	1.39E+13	97.4720	10.26	100.00
S4	11.8	1.45E+13	99.3421	10.07	100.00
L5	11.8	1.48E+13	100.3095	9.97	100.00
R5	11.7	1.51E+13	101.3687	9.86	100.00
S5	11.8	1.53E+13	102.3179	9.77	100.00
S6	11.7	1.59E+13	104.2172	9.60	100.00
SQ	12.8	2.92E+13	141.1578	7.08	100.00

Simulated Plant Record Analysis
 Kentucky Power - Distr

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Account: KEPCo 101/6 371 - KY
 Version: KEPCO DISTRIBUTION 2008
 Method: Simulated Balances

No. of Test Points: 20 Interval: 0 Observation Band: 1989 - 2008

Dispersion	Avg Service Life	Sum of Squared Differences	Index of Variation	Conformance Index	Retirement Experience Index
R0.5	13.5	7.63E+12	60.3148	16.58	100.00
S-.5	13.6	7.73E+12	60.7055	16.47	100.00
L0	14.2	7.90E+12	61.3677	16.30	100.00
R1	13.1	8.16E+12	62.3697	16.03	100.00
L0.5	13.8	8.18E+12	62.4616	16.01	100.00
S0	13.1	8.31E+12	62.9560	15.88	100.00
L1	13.3	8.51E+12	63.7196	15.69	100.00
R1.5	12.7	8.73E+12	64.5291	15.50	100.00
S0.5	12.8	8.79E+12	64.7351	15.45	100.00
L1.5	13.1	8.96E+12	65.3735	15.30	100.00
S1	12.6	9.29E+12	66.5454	15.03	100.00
R2	12.5	9.33E+12	66.7055	14.99	100.00
L2	12.7	9.43E+12	67.0742	14.91	100.00
R1.5	12.4	9.76E+12	68.2092	14.66	100.00
R2.5	12.3	9.93E+12	68.9187	14.53	100.00
S2	12.2	1.03E+13	69.9369	14.30	100.00
L3	12.3	1.05E+13	70.5981	14.16	100.00
R3	12.2	1.06E+13	71.0095	14.08	100.00
S3	12.0	1.12E+13	72.9311	13.71	100.00
L4	12.0	1.16E+13	74.2337	13.47	100.00
R4	12.0	1.16E+13	74.5259	13.42	100.00
S4	11.8	1.22E+13	76.3157	13.10	100.00
L5	11.8	1.25E+13	77.2086	12.95	100.00
R5	11.8	1.28E+13	78.0546	12.81	100.00
S5	11.8	1.30E+13	78.8412	12.68	100.00
S6	11.8	1.36E+13	80.5478	12.41	100.00
SQ	12.9	2.46E+13	108.2238	9.24	100.00

Simulated Plant Record Analysis
 Kentucky Power - Distr

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Account: KEPCo 101/6 371 - KY
 Version: KEPCO DISTRIBUTION 2008
 Method: Simulated Balances

No. of Test Points: 10 Interval: 0 Observation Band: 1999 - 2008

Dispersion	Avg Service Life	Sum of Squared Differences	Index of Variation	Conformance Index	Retirement Experience Index
L0	14.9	3.19E+12	39.7824	25.14	100.00
S-.5	14.1	3.21E+12	39.9151	25.05	100.00
R0.5	14.0	3.22E+12	39.9584	25.03	100.00
L0.5	14.3	3.29E+12	40.4041	24.75	100.00
L1	13.8	3.41E+12	41.1335	24.31	100.00
S0	13.6	3.45E+12	41.3901	24.16	100.00
R1	13.5	3.50E+12	41.6730	24.00	100.00
L1.5	13.4	3.63E+12	42.4153	23.58	100.00
S0.5	13.2	3.66E+12	42.5980	23.48	100.00
R1.5	13.2	3.76E+12	43.1966	23.15	100.00
L2	13.2	3.84E+12	43.6727	22.90	100.00
S1	13.0	3.89E+12	43.9540	22.75	100.00
R2	12.9	4.04E+12	44.7529	22.34	100.00
S1.5	12.8	4.11E+12	45.1409	22.15	100.00
R2.5	12.7	4.29E+12	46.1334	21.68	100.00
S2	12.6	4.32E+12	46.3067	21.60	100.00
L3	12.8	4.42E+12	46.8369	21.35	100.00
R3	12.6	4.56E+12	47.5494	21.03	100.00
S3	12.5	4.79E+12	48.7364	20.52	100.00
R4	12.4	5.05E+12	50.0646	19.97	100.00
L4	12.4	5.06E+12	50.1100	19.96	100.00
S4	12.3	5.40E+12	51.7530	19.32	100.00
L5	12.2	5.62E+12	52.8145	18.93	100.00
R5	12.2	5.74E+12	53.3432	18.75	100.00
S5	12.2	5.95E+12	54.3376	18.40	100.00
S6	12.3	6.37E+12	56.2214	17.79	100.00
SQ	13.4	1.05E+13	72.1963	13.85	100.00

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Act.Yr	Additions	Retirements	Ending Balance
2008	\$1,469,673	\$1,060,049	\$18,001,253
2007	\$1,459,010	\$930,355	\$17,591,629
2006	\$1,577,577	\$1,063,929	\$17,062,974
2005	\$1,768,968	\$818,524	\$16,549,326
2004	\$1,563,148	\$115,921	\$15,598,882
2003	\$2,356,246	\$155,468	\$14,151,655
2002	\$1,536,211	\$370,170	\$11,960,867
2001	\$856,732	\$553,686	\$10,784,826
2000	\$1,331,176	\$637,697	\$10,489,780
1999	\$1,742,973	\$465,115	\$9,796,301
1998	\$600,987	\$553,968	\$8,518,443
1997	\$1,583,946	\$529,850	\$8,471,424
1996	\$496,928	\$246,115	\$7,417,328
1995	\$559,153	\$350,093	\$7,166,516
1994	\$1,062,578	\$354,006	\$6,957,455
1993	\$1,380,740	\$349,338	\$6,248,883
1992	\$843,872	\$292,580	\$5,217,481
1991	\$757,210	\$317,371	\$4,666,189
1990	\$574,638	\$261,542	\$4,226,350
1989	\$673,733	\$291,379	\$3,913,254
1988	\$464,215	\$257,746	\$3,530,900
1987	\$478,198	\$421,123	\$3,324,431
1986	\$500,633	\$195,928	\$3,267,356
1985	\$430,816	\$184,064	\$2,962,651
1984	\$455,174	\$152,915	\$2,715,899
1983	\$359,728	\$156,108	\$2,413,640
1982	\$259,270	\$102,664	\$2,210,020
1981	\$301,789	\$124,056	\$2,053,414
1980	\$217,442	\$114,552	\$1,875,681
1979	\$195,902	\$87,903	\$1,772,791
1978	\$183,648	\$67,643	\$1,664,792
1977	\$122,908	\$58,498	\$1,548,787
1976	\$245,454	\$66,077	\$1,484,377
1975	\$182,106	\$64,832	\$1,305,000
1974	\$198,910	\$85,653	\$1,187,726

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Act/Yr	Additions	Retirements	Ending Balance
1973	\$226,725	\$64,412	\$1,054,469
1972	\$193,516	\$65,976	\$892,156
1971	\$118,336	\$55,327	\$764,616
1970	\$118,346	\$59,938	\$701,607
1969	\$134,430	\$67,189	\$643,199
1968	\$94,059	\$73,277	\$575,958
1967	\$112,403	\$61,218	\$555,176
1966	\$83,111	\$59,600	\$503,991
1965	\$113,528	\$57,173	\$480,480
1964	\$95,784	\$49,551	\$424,125
1963	\$117,412	\$40,351	\$377,922
1962	\$155,649	\$36,416	\$300,861
1961	\$133,773	\$7,257	\$181,628
1960	\$52,064	\$513	\$55,112
1959	\$3,085	\$0	\$3,561
1958	\$0	\$0	\$476
1957	\$62	\$0	\$476
1956	\$46	\$0	\$414
1955	\$0	\$0	\$368
1954	\$0	\$0	\$368
1953	\$45	\$0	\$368
1952	\$0	\$0	\$323
1951	\$0	\$0	\$323
1950	\$323	\$0	\$323
1949	\$0	\$0	\$0
1948	\$0	\$0	\$0
1947	\$0	\$0	\$0
1946	\$0	\$0	\$0
1945	\$0	\$0	\$0
1944	\$0	\$0	\$0
1943	\$0	\$0	\$0
1942	\$0	\$0	\$0
1941	\$0	\$0	\$0
1940	\$0	\$0	\$0
1939	\$0	\$0	\$0

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Act Yr	Additions	Retirements	Ending Balance
1938	\$0	\$0	\$0
1937	\$0	\$0	\$0
1936	\$0	\$0	\$0

\$0
\$0
\$0

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KENTUCKY POWER COMPANY
 Depreciation Study as of December 31, 2008
 Distribution Plant

Account	<u>373 STREET LIGHTING & SIGNAL SYSTEMS</u>	
Depreciable Balance	\$2,939,603	
	<u>Current</u>	<u>Recommended</u>
Average Service Life (Yrs)	15	24
Iowa Curve	L.O.O	L.O.O
Gross Removal, %		5%
Gross Salvage, %		3%
Net Salvage %	15%	-2%

 The simulation analyses for the investment in this account show a fluctuation in the retirement dispersion between the L and S type Iowa Curves. Both dispersion types show a slight increase is occurring in the average service life. Based on the analysis of the 40 year band, the recommendation is to increase the average service life to 24 years and to retain the L.O.O type dispersion.

Labor and material costs will result in removal costs for this investment. Some net salvage may be expected from the sale of material.

Simulated Plant Record Analysis
 Kentucky Power - Distr

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Account: KEPCo 101/6 373 - KY
 Version: KEPCO DISTRIBUTION 2008
 Method: Simulated Balances

No. of Test Points: 40 Interval: 0 Observation Band: 1969 - 2008

Dispersion	Avg Service Life	Sum of Squared Differences	Index of Variation	Conformance Index	Retirement Experience Index
L0	23.7	3.10E+12	170.7820	5.86	99.83
R0.5	22.6	3.13E+12	171.5114	5.83	100.00
S-.5	22.6	3.21E+12	173.7581	5.76	100.00
R1	21.8	3.25E+12	174.7951	5.72	100.00
L0.5	23.1	3.29E+12	175.8772	5.69	99.94
R1.5	21.5	3.32E+12	176.5712	5.66	100.00
R2	21.2	3.39E+12	178.5424	5.60	100.00
R2.5	20.8	3.41E+12	179.1276	5.58	100.00
S0	22.0	3.43E+12	179.6259	5.57	100.00
R3	20.7	3.46E+12	180.3085	5.55	100.00
S6	20.5	3.48E+12	180.7552	5.53	100.00
L1	22.5	3.49E+12	181.1295	5.52	100.00
R4	20.4	3.50E+12	181.3813	5.51	100.00
S0.5	21.7	3.52E+12	182.0057	5.49	100.00
R5	20.5	3.53E+12	182.0686	5.49	100.00
S5	20.4	3.55E+12	182.5666	5.48	100.00
L1.5	22.2	3.61E+12	184.2537	5.43	100.00
L5	20.6	3.61E+12	184.2959	5.43	100.00
S4	20.5	3.62E+12	184.3425	5.42	100.00
S1	21.3	3.62E+12	184.5427	5.42	100.00
S1.5	21.0	3.65E+12	185.1562	5.40	100.00
S3	20.6	3.67E+12	185.7864	5.38	100.00
S2	20.9	3.68E+12	186.0825	5.37	100.00
L4	20.8	3.70E+12	186.3771	5.37	100.00
L2	21.8	3.76E+12	187.9327	5.32	100.00
L3	21.3	3.82E+12	189.5722	5.28	100.00
SQ	22.1	4.19E+12	198.4941	5.04	100.00

Simulated Plant Record Analysis
 Kentucky Power - Distr

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Account: KEPCo 101/6 373 - KY
 Version: KEPCO DISTRIBUTION 2008
 Method: Simulated Balances

No. of Test Points: 20 Interval: 0 Observation Band: 1989 - 2008

Dispersion	Avg Service Life	Sum of Squared Differences	Index of Variation	Conformance Index	Retirement Experience Index
S6	21.4	9.90E+11	93.1515	10.74	100.00
S5	21.5	1.08E+12	97.2519	10.28	100.00
R5	21.7	1.09E+12	97.7171	10.23	100.00
R4	21.8	1.17E+12	101.1999	9.88	100.00
L5	21.8	1.18E+12	101.5662	9.85	100.00
R0.5	24.1	1.20E+12	102.6310	9.74	100.00
S4	21.6	1.21E+12	102.7983	9.73	100.00
L0	26.5	1.24E+12	104.3183	9.59	99.50
R3	21.9	1.25E+12	104.4927	9.57	100.00
S-.5	24.3	1.26E+12	105.1720	9.51	100.00
R1	23.5	1.26E+12	105.2683	9.50	100.00
R2.5	22.2	1.27E+12	105.4939	9.48	100.00
R1.5	22.9	1.29E+12	106.1548	9.42	100.00
R2	22.6	1.31E+12	106.9762	9.35	100.00
L4	21.9	1.33E+12	108.0478	9.26	100.00
L0.5	24.9	1.35E+12	108.6375	9.20	99.82
S3	22.0	1.36E+12	109.0772	9.17	100.00
S0	23.7	1.40E+12	110.7626	9.03	100.00
SQ	23.1	1.41E+12	111.1748	8.99	100.00
S0.5	23.4	1.45E+12	112.5642	8.88	100.00
S2	22.3	1.46E+12	113.2549	8.83	100.00
L1	24.3	1.46E+12	113.2695	8.83	100.00
S1.5	22.7	1.48E+12	113.7163	8.79	100.00
S1	22.8	1.49E+12	114.4577	8.74	100.00
L1.5	23.7	1.51E+12	115.1355	8.69	100.00
L3	22.7	1.53E+12	115.9609	8.62	100.00
L2	23.3	1.58E+12	117.7177	8.49	100.00

Simulated Plant Record Analysis
 Kentucky Power - Distr

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Account: KEPCo 101/6 373 - KY
 Version: KEPCO DISTRIBUTION 2008
 Method: Simulated Balances

No. of Test Points: 10 Interval: 0 Observation Band: 1999 - 2008

Dispersion	Avg Service Life	Sum of Squared Differences	Index of Variation	Conformance Index	Retirement Experience Index
L0	28.5	5.31E+10	27.3103	36.62	98.41
R0.5	26.8	5.39E+10	27.5115	36.35	100.00
S-.5	26.7	5.76E+10	28.4264	35.18	100.00
R1	25.9	6.09E+10	29.2306	34.21	100.00
L0.5	27.5	6.45E+10	30.0957	33.23	99.37
R1.5	25.5	6.59E+10	30.4143	32.88	100.00
R2.5	24.4	6.94E+10	31.2148	32.04	100.00
S0	26.1	6.97E+10	31.2756	31.97	100.00
R2	24.8	7.02E+10	31.4046	31.84	100.00
R3	24.1	7.17E+10	31.7399	31.51	100.00
L1	26.8	7.84E+10	33.1753	30.14	99.94
S0.5	25.7	7.91E+10	33.3181	30.01	100.00
R4	23.5	8.35E+10	34.2417	29.20	100.00
R1	25.3	9.06E+10	35.6716	28.03	100.00
L1.5	26.1	9.21E+10	35.9616	27.81	99.98
S1.5	24.7	9.60E+10	36.7126	27.24	100.00
S2	24.3	1.03E+11	38.0980	26.25	100.00
S3	23.7	1.09E+11	39.0512	25.61	100.00
L2	25.5	1.12E+11	39.6209	25.24	100.00
S4	23.1	1.19E+11	40.9618	24.41	100.00
R5	22.9	1.22E+11	41.4034	24.15	100.00
L4	23.5	1.25E+11	41.9385	23.84	100.00
L3	24.6	1.32E+11	43.0460	23.23	100.00
L5	22.9	1.35E+11	43.4657	23.01	100.00
S5	22.7	1.37E+11	43.7795	22.84	100.00
S6	22.4	1.54E+11	46.4275	21.54	100.00
SQ	24.2	4.21E+11	76.9184	13.00	100.00

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Act.Yr.	Additions	Retirements	Ending Balance
2008	\$141,474	\$97,394	\$2,939,603
2007	\$173,112	\$102,177	\$2,895,523
2006	\$151,500	\$145,114	\$2,824,588
2005	\$155,045	\$78,077	\$2,818,202
2004	\$139,549	\$33,892	\$2,741,234
2003	\$114,834	\$39,163	\$2,635,577
2002	\$90,680	\$27,698	\$2,559,906
2001	\$106,554	\$22,268	\$2,496,924
2000	\$77,936	\$26,217	\$2,413,638
1999	\$88,549	\$15,450	\$2,361,919
1998	\$41,175	\$20,374	\$2,288,820
1997	\$40,819	\$26,937	\$2,268,019
1996	\$50,186	\$18,665	\$2,254,137
1995	\$65,504	\$30,017	\$2,222,616
1994	\$98,733	\$37,451	\$2,187,129
1993	\$183,145	\$27,095	\$2,125,847
1992	\$13,549	\$21,277	\$1,968,797
1991	\$62,428	\$48,604	\$1,977,525
1990	\$213,752	\$73,803	\$1,963,701
1989	\$347,755	\$109,998	\$1,823,752
1988	\$206,152	\$110,040	\$1,565,995
1987	\$203,850	\$73,264	\$1,489,883
1986	\$209,086	\$40,399	\$1,359,257
1985	\$120,997	\$37,932	\$1,190,570
1984	\$50,621	\$13,841	\$1,107,505
1983	\$93,110	\$28,192	\$1,070,725
1982	\$184,014	\$44,775	\$1,005,807
1981	\$142,598	\$53,310	\$866,568
1980	\$80,303	\$37,188	\$777,280
1979	\$22,164	\$17,100	\$734,165
1978	\$56,734	\$28,008	\$729,101
1977	\$19,454	\$15,865	\$700,375
1976	\$16,853	\$4,177	\$696,776
1975	\$41,522	\$16,546	\$684,100
1974	\$37,035	\$11,431	\$659,124

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Act. Yr.	Additions	Retirements	Ending Balance
1988	\$9,692	\$5,960	\$142,953
1987	\$16,031	\$3,042	\$139,221
1986	\$126,232	\$0	\$126,232

\$0
\$0
\$0
\$0
\$0

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KENTUCKY POWER COMPANY
DEPRECIATION STUDY AS OF 12-31-08
DISTRIBUTION PLANT WORKPAPERS

SALVAGE AND REMOVAL ANALYSIS

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21-Oct-09

KENTUCKY POWER COMPANY
 Distribution Plant Net Salvage Test

Year	Original Cost Retired by Plant Account										373	Total	Net Salvage %	Functional Net Salvage
	361	362	364	365	366	367	368	369	370	371				
1994	19,675	267,934	144,412	1,379,652	199	18,365	1,164,053	562,102	576,545	354,006	37,451	4,524,294	4%	200,649
1995	2,757	287,579	1,671,011	2,649,129	6,842	19,071	1,313,309	497,449	631,063	350,093	30,017	7,357,320	1%	39,259
1996	5,030	454,597	1,126,837	1,662,236	1,248	37,421	1,579,917	475,561	517,207	246,115	18,669	6,125,834	2%	96,665
1997	6,522	734,060	1,542,829	1,666,505	4,035	46,345	2,186,374	522,610	836,156	529,850	26,987	8,102,223	6%	474,137
1998	57,059	430,669	1,062,705	867,094	1,777	16,729	1,560,837	431,172	723,727	553,968	20,374	5,746,071	8%	487,840
1999	462	139,384	779,722	767,232	2,608	11,656	1,276,242	344,602	979,544	465,115	15,450	4,778,017	4%	178,028
2000	0	430,936	1,459,576	1,553,565	6,479	36,661	1,443,110	569,287	1,709,961	637,697	26,217	7,873,489	16%	1,288,086
2001	0	543,501	1,402,184	1,323,285	8,421	11,194	1,029,459	390,080	639,511	563,686	22,268	5,994,589	-7%	-403,255
2002	0	163,287	1,100,199	2,020,300	16,953	71,261	1,055,795	508,684	970,185	370,170	27,698	6,304,532	30%	1,866,215
2003	0	448,926	770,546	1,665,159	2,829	23,089	1,073,924	630,850	624,632	155,458	39,163	5,434,676	-2%	-121,659
2004	370	325,680	3,264,700	1,048,651	2,052	37,052	1,076,234	511,999	832,607	115,921	33,892	7,249,358	-15%	-1,080,231
2005	25,016	1,290,672	728,627	1,685,652	1,443	36,728	1,190,660	760,371	1,515,899	818,523	78,077	8,110,338	-7%	-556,174
2006	0	854,853	839,957	2,373,219	7,368	144,643	1,756,227	1,144,609	9,319,669	1,063,929	145,114	17,649,598	6%	1,086,023
2007	0	811,720	1,283,667	2,993,281	3,259	36,512	2,367,716	887,176	9,874,912	930,355	102,177	19,390,775	-10%	-1,905,849
2008	206	197,774	1,315,032	3,155,687	694	53,234	2,310,335	720,680	1,023,534	1,060,049	97,394	9,934,619	-22%	-2,182,453
TOTAL	117,097	7,375,782	18,514,004	26,690,507	65,007	599,961	22,385,162	8,957,232	30,875,152	8,214,935	720,894	124,515,733	0%	532,722

EVALUATION BASED ON 1994-2008 ACTUAL

Total Retirals	117,097	7,375,782	18,514,004	26,690,507	65,007	599,961	22,385,162	8,957,232	30,875,152	8,214,935	720,894	124,515,733		
Net Salvage %	10	10	-53	25	0	0	25	-15	-8	-15	-2	-1		
Net Salvage \$	11,710	737,578	-9,812,422	6,672,627	0	0	5,596,291	-1,343,585	-2,470,012	-1,232,240	-14,418	-1,854,472		

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21-Oct-09

KENTUCKY POWER COMPANY
 Distribution Plant Gross Removal Test

Year	Original Cost Retired by Plant Account										373	Total	Removal %	Functional Gross Removal
	361	362	364	365	366	367	368	369	370	371				
1994	19,675	267,934	144,412	1,379,652	199	18,365	1,164,053	562,102	576,645	354,006	37,451	4,524,294	43%	1,954,453
1995	2,757	287,578	1,671,011	2,549,129	5,842	19,071	1,313,509	487,449	531,063	350,093	30,017	7,357,320	29%	2,119,861
1996	5,030	454,597	1,728,837	1,662,236	1,246	37,421	1,578,917	475,561	517,207	246,115	18,665	6,125,834	20%	1,245,388
1997	6,522	734,060	1,542,829	1,666,505	4,035	46,345	2,186,374	522,610	836,156	529,850	26,937	8,102,223	18%	1,444,506
1998	57,059	430,669	1,082,705	867,054	1,777	16,723	1,560,837	431,172	723,727	553,868	20,374	5,748,071	14%	804,413
1999	462	133,384	779,722	787,232	2,608	11,656	1,278,242	344,602	978,544	465,115	15,450	4,778,017	5%	262,682
2000	0	430,936	1,459,576	1,553,565	6,479	36,661	1,443,110	569,287	1,709,961	637,997	26,217	7,873,489	3%	213,654
2001	0	543,501	1,402,184	1,323,265	9,421	11,194	1,029,459	508,684	639,511	563,666	22,269	5,934,589	44%	2,593,366
2002	0	163,287	1,100,199	2,020,300	16,953	71,261	1,055,795	970,185	970,185	370,170	27,698	6,304,532	47%	2,969,610
2003	0	448,926	770,546	1,685,159	2,829	23,089	1,073,924	630,850	624,632	155,458	39,163	5,434,676	31%	1,682,264
2004	370	325,880	3,264,700	1,048,651	2,052	37,052	1,078,234	511,989	832,607	115,921	33,692	7,249,358	29%	2,119,206
2005	25,016	1,290,572	728,627	1,665,632	143	36,728	1,190,630	760,371	1,515,889	818,523	78,077	6,110,338	8%	623,423
2006	0	854,963	839,957	2,373,219	7,368	144,643	1,756,227	1,144,609	9,319,669	1,063,929	145,114	17,649,588	14%	2,537,751
2007	0	811,720	1,283,667	2,993,281	3,259	36,512	2,367,716	887,176	9,974,912	930,355	102,177	19,390,775	20%	3,935,794
2008	206	197,774	1,315,032	3,156,687	694	53,234	2,310,335	720,660	1,023,534	1,060,049	97,394	9,834,619	39%	3,892,317
TOTAL	117,097	7,375,782	18,514,004	26,690,507	65,007	599,991	22,385,162	8,957,232	30,875,152	8,214,935	720,894	124,515,733	23%	28,388,728

EVALUATION BASED ON 1994-2008 ACTUAL

	361	362	364	365	366	367	368	369	370	371	373	Total
Total Reimts	117,097	7,375,782	18,514,004	26,690,507	65,007	599,991	22,385,162	8,957,232	30,875,152	8,214,935	720,894	124,515,733
Gross Removal, %	5	25	65	25	0	0	10	15	10	20	5	23
Gross Removal \$	5,855	1,843,946	12,034,103	6,672,627	0	0	2,238,516	1,343,585	3,087,515	1,642,987	36,045	28,905,178

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21-Oct-09

KENTUCKY POWER COMPANY
 Distribution Plant Gross Salvage Test

Original Cost Retired by Plant Account

Year	361	362	364	365	366	367	368	369	370	371	373	Total	Salvage %	Functional Gross Salvage
1994	19,675	267,934	144,412	1,379,552	199	18,365	1,164,053	582,102	576,545	354,006	37,451	4,524,294	48%	2,155,099
1995	2,757	287,579	1,671,011	2,549,129	6,842	19,071	1,313,309	497,449	631,063	350,093	30,017	7,357,320	29%	2,159,120
1996	5,030	454,597	1,128,837	1,662,236	1,248	37,421	1,578,917	475,561	517,207	246,115	18,665	6,125,834	22%	1,342,053
1997	6,522	734,060	1,542,829	1,666,505	4,035	46,345	2,188,374	522,610	836,156	529,850	26,937	8,102,223	24%	1,918,643
1998	57,059	430,669	1,082,705	867,054	1,777	16,729	1,560,837	431,172	723,727	553,968	20,374	5,746,071	22%	1,292,253
1999	462	133,384	779,722	767,232	2,608	11,656	1,278,242	344,602	979,544	465,115	15,450	4,778,017	9%	440,710
2000	0	430,936	1,459,576	1,553,566	6,479	36,661	1,443,110	569,287	1,709,961	637,597	26,217	7,873,489	19%	1,501,740
2001	0	543,601	1,402,184	1,323,285	9,421	11,194	1,029,459	390,080	639,511	370,170	27,698	6,304,532	37%	2,190,111
2002	0	163,287	1,100,199	2,020,300	16,953	71,261	1,055,795	508,684	970,185	370,170	27,698	6,304,532	77%	4,835,825
2003	0	448,926	770,546	1,685,159	2,929	23,069	1,073,924	630,850	624,632	155,458	39,163	5,434,676	29%	1,560,605
2004	370	325,880	3,264,700	1,048,651	2,052	37,052	1,076,234	511,999	832,607	115,921	78,077	8,110,338	14%	1,038,975
2005	25,016	1,290,672	728,627	1,665,652	143	36,728	1,190,630	760,371	1,515,899	818,523	78,077	7,249,358	1%	67,249
2006	0	854,853	839,957	2,373,219	7,368	144,643	1,756,227	1,444,609	9,319,669	1,063,929	145,114	17,649,598	21%	3,623,814
2007	0	811,720	1,283,667	2,983,281	3,259	36,512	2,367,716	887,176	9,974,912	930,355	102,177	19,390,775	10%	2,029,945
2008	206	197,774	1,315,032	3,155,687	694	53,234	2,310,336	720,680	1,023,534	1,060,049	97,394	9,994,619	17%	1,709,864
TOTAL	117,097	7,375,782	18,514,004	26,690,507	95,007	599,951	22,385,162	8,957,232	30,875,152	8,214,935	720,894	124,515,733	22%	27,866,006

EVALUATION BASED ON 1994-2008 RESERVE ACTIVITY

	361	362	364	365	366	367	368	369	370	371	373	Total
Total Retirals	117,097	7,375,782	18,514,004	26,690,507	65,007	599,961	22,385,162	8,957,232	30,875,152	8,214,935	720,894	124,515,733
Gross Salvage %	15	35	12	50	0	0	35	0	2	5	3	22
Gross Salvage \$	17,565	2,581,524	2,221,680	13,345,254	0	0	7,834,807	0	617,503	410,747	21,627	27,050,706

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KENTUCKY POWER COMPANY
DEPRECIATION STUDY AS OF 12-31-08
DISTRIBUTION PLANT WORKPAPERS

CALCULATION OF AGE OF SIMULATED PLANT
BALANCES

Computed Age Distribution Report

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Account: KEPCo 101/6 364 - KY
 Version: KEPCO DISTRIBUTION 2008
 Dispersion: 30 - R0.5

Vintage	Additions	Age 2009	Theoretical Survivors		Computed Survivors		Realized Life
			Percent	Amount	Percent	Amount	
2008	7,948,638	0.5	99.37	7,898,323	100.00	7,948,639	0.50
2007	8,178,275	1.5	98.09	8,021,825	100.00	8,178,276	1.50
2006	6,214,520	2.5	96.79	6,014,765	100.00	6,214,521	2.50
2005	4,777,960	3.5	95.47	4,561,280	100.00	4,777,961	3.50
2004	4,606,829	4.5	94.12	4,336,132	100.00	4,606,830	4.50
2003	3,549,389	5.5	92.76	3,292,508	100.00	3,549,390	5.50
2002	4,243,760	6.5	91.38	3,878,033	99.31	4,214,323	6.48
2001	6,491,237	7.5	89.98	5,840,945	97.78	6,347,452	7.42
2000	6,193,673	8.5	88.56	5,485,303	96.24	5,960,969	8.34
1999	7,750,006	9.5	87.12	6,752,167	94.68	7,337,692	9.25
1998	2,259,261	10.5	85.67	1,935,441	93.10	2,103,276	10.14
1997	2,175,205	11.5	84.19	1,831,283	91.49	1,990,086	11.01
1996	9,692,760	12.5	82.69	8,014,943	89.86	8,709,971	11.87
1995	5,532,239	13.5	81.17	4,490,297	88.20	4,879,680	12.70
1994	6,419,736	14.5	79.62	5,111,180	86.52	5,554,404	13.52
1993	5,227,092	15.5	78.04	4,079,275	84.81	4,433,016	14.32
1992	6,185,410	16.5	76.44	4,727,818	83.06	5,137,798	15.10
1991	6,088,191	17.5	74.80	4,553,886	81.28	4,948,783	15.86
1990	5,783,242	18.5	73.13	4,229,266	79.47	4,596,013	16.60
1989	5,307,552	19.5	71.43	3,791,025	77.62	4,119,770	17.32
1988	4,827,488	20.5	69.69	3,364,244	75.73	3,655,980	18.01
1987	5,327,380	21.5	67.92	3,618,179	73.81	3,931,935	18.68
1986	5,369,391	22.5	66.11	3,549,597	71.84	3,857,406	19.33
1985	4,909,636	23.5	64.26	3,155,046	69.83	3,428,641	19.96
1984	4,313,710	24.5	62.38	2,690,964	67.79	2,924,315	20.55
1983	4,439,316	25.5	60.47	2,684,232	65.71	2,917,000	21.13
1982	4,665,175	26.5	58.52	2,729,827	63.59	2,966,548	21.68
1981	5,803,340	27.5	56.53	3,280,783	61.43	3,565,281	22.20
1980	4,804,915	28.5	54.52	2,619,640	59.25	2,846,805	22.69
1979	3,884,010	29.5	52.48	2,038,238	57.03	2,214,987	23.16
1978	3,251,569	30.5	50.41	1,639,138	54.78	1,781,278	23.60
1977	3,061,702	31.5	48.32	1,479,476	52.51	1,607,770	24.02
1976	2,270,319	32.5	46.21	1,049,213	50.22	1,140,197	24.41
1975	1,611,041	33.5	44.09	710,335	47.92	771,933	24.78
1974	1,552,522	34.5	41.96	651,423	45.60	707,912	25.12
1973	1,515,199	35.5	39.82	603,352	43.27	655,673	25.43
1972	1,255,246	36.5	37.68	472,989	40.95	514,005	25.72
1971	1,229,340	37.5	35.55	436,993	38.63	474,888	25.99
1970	840,500	38.5	33.42	280,915	36.32	305,275	26.24
1969	775,929	39.5	31.31	242,980	34.03	264,050	26.47
1968	779,145	40.5	29.23	227,729	31.76	247,476	26.68
1967	736,064	41.5	27.17	199,996	29.53	217,339	26.88
1966	623,348	42.5	25.15	156,751	27.33	170,344	27.06
1965	625,458	43.5	23.16	144,875	25.17	157,438	27.22
1964	510,960	44.5	21.23	108,463	23.07	117,869	27.38

Computed Age Distribution Report

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Account: KEPCo 101/6 364 - KY
 Version: KEPCO DISTRIBUTION 2008
 Dispersion: 30 - R0.5

Vintage	Additions	Age 2009	Theoretical Survivors		Computed Survivors		Realized Life
			Percent	Amount	Percent	Amount	
1963	412,308	45.5	19.34	79,753	21.02	86,669	27.53
1962	374,871	46.5	17.52	65,666	19.04	71,361	27.68
1961	499,550	47.5	15.76	78,707	17.12	85,533	27.82
1960	350,996	48.5	14.06	49,361	15.28	53,641	27.96
1959	417,502	49.5	12.44	51,946	13.52	56,450	28.10
1958	460,209	50.5	10.90	50,163	11.85	54,513	28.24
1957	421,180	51.5	9.44	39,747	10.26	43,194	28.39
1956	364,630	52.5	8.05	29,370	8.75	31,917	28.55
1955	300,304	53.5	6.76	20,289	7.34	22,048	28.71
1954	286,975	54.5	5.54	15,890	6.02	17,268	28.89
1953	314,622	55.5	4.39	13,824	4.77	15,022	29.08
1952	352,512	56.5	3.32	11,703	3.61	12,718	29.27
1951	535,120	57.5	2.30	12,318	2.50	13,386	29.47
1950	649,686	58.5	1.34	8,693	1.45	9,447	29.68
1949	716,821	59.5	0.00		-0.00	(1)	29.75
1948	927,453	60.5	0.00		0.00		0.00
1947	1,016,765	61.5	0.00		0.00		0.00
1946	836,816	62.5	0.00		0.00		0.00
1945	176,492	63.5	0.00		0.00		0.00
1944	61,306	64.5	0.00		0.00		0.00
1943	39,257	65.5	0.00		0.00		0.00
1942	117,724	66.5	0.00		0.00		0.00
1941	118,223	67.5	0.00		0.00		0.00
1940	206,783	68.5	0.00		0.00		0.00
1939	181,871	69.5	0.00		0.00		0.00
1938	160,568	70.5	0.00		0.00		0.00
1937	146,719	71.5	0.00		0.00		0.00
1936	861,093	72.5	0.00		0.00		0.00
	194,915,033			137,508,499		147,624,353 *	

* Recorded Balance January 1, 2009: 147,624,353

Computed Age Distribution Report

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Account: KEPCo 101/6 365 - KY
 Version: KEPCO DISTRIBUTION 2008
 Dispersion: 30 - R0.5

vintage	Additions	Age 2009	Theoretical Survivors		Computed Survivors		Realized Life
			Percent	Amount	Percent	Amount	
2008	10,259,054	0.5	99.37	10,194,114	100.00	10,259,055	0.50
2007	14,237,195	1.5	98.09	13,964,837	98.84	14,071,576	1.49
2006	8,984,427	2.5	96.79	8,695,638	97.53	8,762,102	2.47
2005	6,436,239	3.5	95.47	6,144,356	96.19	6,191,320	3.43
2004	5,364,176	4.5	94.12	5,048,977	94.84	5,087,569	4.38
2003	4,069,103	5.5	92.76	3,774,608	93.47	3,803,460	5.32
2002	5,622,594	6.5	91.38	5,138,039	92.08	5,177,311	6.24
2001	5,169,647	7.5	89.98	4,651,752	90.67	4,687,307	7.15
2000	5,230,644	8.5	88.56	4,632,415	89.24	4,667,823	8.04
1999	6,688,639	9.5	87.12	5,827,454	87.79	5,871,996	8.92
1998	2,314,364	10.5	85.67	1,982,646	86.32	1,997,801	9.78
1997	7,910,940	11.5	84.19	6,660,141	84.83	6,711,047	10.63
1996	3,270,420	12.5	82.69	2,704,310	83.32	2,724,981	11.46
1995	5,785,493	13.5	81.17	4,695,853	81.79	4,731,745	12.27
1994	4,473,083	14.5	79.62	3,561,320	80.23	3,588,540	13.07
1993	2,861,816	15.5	78.04	2,233,390	78.64	2,250,461	13.84
1992	3,277,636	16.5	76.44	2,505,261	77.02	2,524,410	14.60
1991	3,654,148	17.5	74.80	2,733,254	75.37	2,754,145	15.34
1990	3,794,891	18.5	73.13	2,775,191	73.69	2,796,403	16.07
1989	3,611,129	19.5	71.43	2,579,321	71.97	2,599,036	16.77
1988	3,229,945	20.5	69.69	2,250,927	70.22	2,268,132	17.45
1987	3,764,540	21.5	67.92	2,556,750	68.44	2,576,292	18.11
1986	3,340,589	22.5	66.11	2,208,397	66.61	2,225,276	18.74
1985	2,604,969	23.5	64.26	1,674,014	64.75	1,686,809	19.36
1984	2,380,654	24.5	62.38	1,485,092	62.86	1,496,443	19.95
1983	2,562,107	25.5	60.47	1,549,178	60.93	1,561,019	20.52
1982	2,865,659	26.5	58.52	1,676,840	58.96	1,689,657	21.06
1981	4,443,270	27.5	56.53	2,511,899	56.96	2,531,098	21.58
1980	3,591,035	28.5	54.52	1,957,832	54.94	1,972,796	22.08
1979	3,199,783	29.5	52.48	1,679,171	52.88	1,692,006	22.55
1978	2,734,482	30.5	50.41	1,378,471	50.80	1,389,007	23.00
1977	3,143,761	31.5	48.32	1,519,138	48.69	1,530,749	23.42
1976	1,782,930	32.5	46.21	823,969	46.57	830,267	23.82
1975	1,026,632	33.5	44.09	452,659	44.43	456,119	24.19
1974	1,088,826	34.5	41.96	456,861	42.28	460,353	24.54
1973	1,108,750	35.5	39.82	441,504	40.12	444,879	24.87
1972	1,152,475	36.5	37.68	434,264	37.97	437,583	25.18
1971	1,451,307	37.5	35.55	515,896	35.82	519,839	25.47
1970	1,150,481	38.5	33.42	384,518	33.68	387,456	25.73
1969	992,508	39.5	31.31	310,801	31.55	313,176	25.98
1968	949,626	40.5	29.23	277,557	29.45	279,678	26.21
1967	869,418	41.5	27.17	236,230	27.38	238,035	26.43
1966	728,131	42.5	25.15	183,101	25.34	184,500	26.63
1965	688,379	43.5	23.16	159,449	23.34	160,668	26.83
1964	500,173	44.5	21.23	106,173	21.39	106,985	27.01

Computed Age Distribution Report

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Account: KEPCo 101/6 365 - KY
 Version: KEPCO DISTRIBUTION 2008
 Dispersion: 30 - R0.5

Age	Additions	Age 2009	Theoretical Survivors		Computed Survivors		Realized Life
			Percent	Amount	Percent	Amount	
1963	342,519	45.5	19.34	66,253	19.49	66,760	27.18
1962	356,863	46.5	17.52	62,512	17.65	62,990	27.35
1961	431,518	47.5	15.76	67,989	15.88	68,508	27.52
1960	309,563	48.5	14.06	43,548	14.17	43,881	27.69
1959	332,979	49.5	12.44	41,429	12.54	41,746	27.85
1958	411,734	50.5	10.90	44,879	10.98	45,222	28.02
1957	370,826	51.5	9.44	34,995	9.51	35,262	28.20
1956	335,384	52.5	8.05	27,015	8.12	27,221	28.38
1955	247,836	53.5	6.76	16,744	6.81	16,872	28.57
1954	237,566	54.5	5.54	13,154	5.58	13,255	28.77
1953	254,683	55.5	4.39	11,190	4.43	11,275	28.98
1952	291,012	56.5	3.32	9,662	3.35	9,735	29.20
1951	393,824	57.5	2.30	9,065	2.32	9,134	29.42
1950	509,472	58.5	1.34	6,817	1.35	6,869	29.64
1949	591,741	59.5	0.00		-0.00	(1)	29.75
1948	780,371	60.5	0.00		0.00		0.00
1947	845,275	61.5	0.00		0.00		0.00
1946	541,149	62.5	0.00		0.00		0.00
1945	107,824	63.5	0.00		0.00		0.00
1944	34,927	64.5	0.00		0.00		0.00
1943	14,300	65.5	0.00		0.00		0.00
1942	71,460	66.5	0.00		0.00		0.00
1941	90,549	67.5	0.00		0.00		0.00
1940	125,801	68.5	0.00		0.00		0.00
1939	132,698	69.5	0.00		0.00		0.00
1938	124,001	70.5	0.00		0.00		0.00
1937	120,859	71.5	0.00		0.00		0.00
1936	771,885	72.5	0.00		0.00		0.00
	173,544,807			128,188,820		129,155,638 *	

* Recorded Balance January 1, 2009: 129,155,638

Computed Age Distribution Report

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Account: KEPCo 101/6 366 - KY
 Version: KEPCO DISTRIBUTION 2008
 Dispersion: 50 - R0.5

Vintage	Additions	Age 2009	Theoretical Survivors		Computed Survivors		Realized Life
			Percent	Amount	Percent	Amount	
2008	332,819	0.5	99.62	331,558	100.00	332,820	0.50
2007	312,381	1.5	98.86	308,810	100.00	312,382	1.50
2006	509,176	2.5	98.09	499,435	100.00	509,177	2.50
2005	199,943	3.5	97.31	194,561	100.00	199,944	3.50
2004	173,356	4.5	96.52	167,328	100.00	173,357	4.50
2003	118,994	5.5	95.73	113,914	100.00	118,995	5.50
2002	134,439	6.5	94.93	127,624	100.00	134,440	6.50
2001	123,659	7.5	94.12	116,393	100.00	123,660	7.50
2000	182,080	8.5	93.31	169,897	100.00	182,081	8.50
1999	137,692	9.5	92.49	127,349	100.00	137,693	9.50
1998	60,158	10.5	91.66	55,141	100.00	60,159	10.50
1997	291,323	11.5	90.82	264,591	100.00	291,324	11.50
1996	131,833	12.5	89.98	118,626	100.00	131,834	12.50
1995	133,289	13.5	89.13	118,804	100.00	133,290	13.50
1994	118,922	14.5	88.28	104,981	100.00	118,923	14.50
1993	270,669	15.5	87.41	236,603	100.00	270,670	15.50
1992	131,413	16.5	86.54	113,730	100.00	131,414	16.50
1991	51,993	17.5	85.67	44,541	99.39	51,675	17.45
1990	207,078	18.5	84.78	175,567	98.36	203,685	18.35
1989	49,004	19.5	83.89	41,110	97.33	47,694	19.24
1988	25,065	20.5	82.99	20,802	96.29	24,134	20.12
1987	9,664	21.5	82.08	7,933	95.23	9,203	20.99
1986	35,696	22.5	81.17	28,973	94.17	33,613	21.84
1985	75,471	23.5	80.24	60,558	93.09	70,257	22.69
1984	4,604	24.5	79.30	3,651	92.01	4,236	23.52
1983	39,828	25.5	78.36	31,209	90.91	36,207	24.34
1982	48,652	26.5	77.40	37,658	89.80	43,689	25.15
1981	79,179	27.5	76.44	60,520	88.68	70,213	25.94
1980	46,085	28.5	75.46	34,774	87.54	40,344	26.72
1979	8,197	29.5	74.47	6,104	86.40	7,082	27.49
1978	28,154	30.5	73.47	20,684	85.23	23,997	28.25
1977	37,280	31.5	72.45	27,010	84.06	31,336	28.99
1976	51,203	32.5	71.43	36,573	82.87	42,430	29.72
1975	31,345	33.5	70.39	22,063	81.66	25,597	30.43
1974	53,663	34.5	69.34	37,209	80.44	43,167	31.13
1973	60,340	35.5	68.27	41,197	79.21	47,793	31.81
1972	27,833	36.5	67.20	18,703	77.96	21,698	32.48
1971	37,062	37.5	66.11	24,501	76.69	28,424	33.13
1970	30,547	38.5	65.01	19,857	75.41	23,036	33.77
1969	3,136	39.5	63.89	2,004	74.13	2,325	34.39
1968	820	40.5	62.76	515	72.86	597	35.00
1967	6,556	41.5	61.62	4,040	71.48	4,686	35.58
1966	4,153	42.5	60.47	2,511	70.14	2,913	35.15
1947	55	61.5	36.83	20	43.58	24	44.15
1942	144	66.5	30.48	44	35.63	51	45.10

Computed Age Distribution Report

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Account: KEPCo 101/6 366 - KY
 Version: KEPCO DISTRIBUTION 2008
 Dispersion: 50 - R0.5

Vintage	Additions	Age 2009	Theoretical Survivors		Computed Survivors		Realized Life
			Percent	Amount	Percent	Amount	
1940	77	68.5	27.99	22	33.02	25	45.56
1939	315	69.5	26.76	84	31.08	98	45.55
1936	1,383	72.5	23.16	320	26.76	370	45.96
		4,416,728	3,980,102		4,302,755 *		

* Recorded Balance January 1, 2009: 4,302,755

Computed Age Distribution Report

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Account: KEPCo 101/6 367 - KY
 Version: KEPCO DISTRIBUTION 2008
 Dispersion: 50 - S-5

Vintage	Additions	Age 2009	Theoretical Survivors		Computed Survivors		Realized Life
			Percent	Amount	Percent	Amount	
2008	578,818	0.5	99.74	577,307	99.54	576,157	0.50
2007	973,386	1.5	99.18	965,385	98.98	963,461	1.49
2006	784,947	2.5	98.58	773,762	98.38	772,220	2.48
2005	104,018	3.5	97.94	101,871	97.74	101,669	3.46
2004	811,825	4.5	97.27	789,622	97.07	788,048	4.43
2003	245,976	5.5	96.57	237,527	96.37	237,054	5.40
2002	150,681	6.5	95.84	144,408	95.65	144,121	6.36
2001	293,525	7.5	95.08	279,092	94.89	278,537	7.31
2000	259,570	8.5	94.30	244,785	94.12	244,297	8.25
1999	377,491	9.5	93.50	352,965	93.32	352,262	9.18
1998	147,054	10.5	92.68	136,290	92.50	136,018	10.11
1997	339,985	11.5	91.84	312,225	91.65	311,603	11.02
1996	190,902	12.5	90.97	173,664	90.79	173,318	11.92
1995	209,851	13.5	90.09	189,046	89.91	188,670	12.82
1994	177,719	14.5	89.18	158,497	89.01	158,181	13.70
1993	285,294	15.5	88.26	251,812	88.09	251,310	14.58
1992	155,416	16.5	87.33	135,720	87.15	135,450	15.44
1991	141,320	17.5	86.37	122,064	86.20	121,821	16.29
1990	367,094	18.5	85.41	313,520	85.24	312,895	17.13
'89	117,298	19.5	84.42	99,025	84.25	98,828	17.96
1988	78,161	20.5	83.43	65,206	83.26	65,076	18.78
1987	108,890	21.5	82.41	89,740	82.25	89,561	19.59
1986	79,589	22.5	81.39	64,777	81.23	64,648	20.39
1985	119,906	23.5	80.35	96,347	80.19	96,155	21.17
1984	21,545	24.5	79.30	17,086	79.15	17,052	21.95
1983	100,965	25.5	78.24	78,997	78.09	78,840	22.71
1982	263,053	26.5	77.17	203,001	77.02	202,595	23.45
1981	112,466	27.5	76.09	85,574	75.94	85,404	24.19
1980	86,392	28.5	75.00	64,791	74.85	64,662	24.92
1979	45,415	29.5	73.90	33,560	73.75	33,493	25.63
1978	83,270	30.5	72.79	60,609	72.64	60,488	26.33
1977	52,882	31.5	71.67	37,899	71.52	37,824	27.02
1976	67,240	32.5	70.54	47,432	70.40	47,337	27.69
1975	23,860	33.5	69.41	16,560	69.27	16,528	28.35
1974	76,050	34.5	68.27	51,916	68.13	51,812	29.00
1973	137,903	35.5	67.12	92,558	66.98	92,372	29.64
1972	109,531	36.5	65.96	72,251	65.83	72,106	30.26
1971	86,370	37.5	64.80	55,971	64.67	55,859	30.88
1970	76,458	38.5	63.64	48,657	63.51	48,559	31.48
1969	11,767	39.5	62.47	7,351	62.35	7,336	32.06
'68	4,973	40.5	61.30	3,048	61.18	3,042	32.64
1967	15,264	41.5	60.12	9,176	59.99	9,157	33.20
1966	4,745	42.5	58.94	2,796	58.82	2,791	33.75
1965	2,102	43.5	57.75	1,214	57.64	1,212	34.29
1963	1,638	45.5	55.37	907	55.26	905	35.32

Computed Age Distribution Report

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Account: KEPCo 10/1/6 367 - KY
 Version: KEPCO DISTRIBUTION 2008
 Dispersion: 50 - S-5

Vintage	Additions	Age 2009	Theoretical Survivors		Computed Survivors		Realized Life
			Percent	Amount	Percent	Amount	
1957	474	51.5	48.21	229	48.17	228	38.15
1947	543	61.5	36.36	197	36.33	197	41.92
1942	306	66.5	30.59	94	30.64	94	43.44
1940	198	68.5	28.33	56	28.46	56	44.00
1939	1,515	69.5	27.21	412	27.11	411	44.17
1936	1,683	72.5	23.91	402	23.79	400	44.87
		8,487,324	7,667,400		7,652,122 *		

* Recorded Balance January 1, 2009: 7,652,122

Computed Age Distribution Report

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Account: KEPCo 101/6 368 - KY
 Version: KEPCO DISTRIBUTION 2008
 Dispersion: 30 - R0.5

Vintage	Additions	Age 2009	Theoretical Survivors		Computed Survivors		Realized Life
			Percent	Amount	Percent	Amount	
2008	7,450,618	0.5	99.37	7,403,456	100.00	7,450,619	0.50
2007	7,254,032	1.5	98.09	7,115,262	100.00	7,254,033	1.50
2006	4,661,413	2.5	96.79	4,511,580	98.91	4,610,531	2.49
2005	2,488,476	3.5	95.47	2,375,624	97.56	2,427,728	3.46
2004	2,607,713	4.5	94.12	2,454,484	96.19	2,508,317	4.41
2003	1,347,430	5.5	92.76	1,249,912	94.80	1,277,326	5.36
2002	3,758,604	6.5	91.38	3,434,688	93.39	3,510,020	6.29
2001	2,396,046	7.5	89.98	2,156,010	91.96	2,203,297	7.20
2000	3,420,485	8.5	88.56	3,029,284	90.51	3,095,725	8.10
1999	4,458,378	9.5	87.12	3,884,347	89.04	3,969,541	8.98
1998	3,482,894	10.5	85.67	2,983,691	87.55	3,049,131	9.85
1997	4,777,388	11.5	84.19	4,022,035	86.04	4,110,249	10.70
1996	3,287,901	12.5	82.69	2,718,765	84.50	2,778,395	11.53
1995	4,198,526	13.5	81.17	3,407,776	82.95	3,482,517	12.35
1994	5,479,512	14.5	79.62	4,362,605	81.36	4,458,288	13.15
1993	4,268,448	15.5	78.04	3,331,140	79.75	3,404,200	13.93
1992	3,210,065	16.5	76.44	2,453,613	78.11	2,507,428	14.69
1991	3,837,537	17.5	74.80	2,870,427	76.44	2,933,383	15.44
1990	3,902,514	18.5	73.13	2,853,895	74.73	2,916,489	16.16
1989	3,776,952	19.5	71.43	2,697,764	72.99	2,756,933	16.87
1988	2,317,695	20.5	69.69	1,615,186	71.22	1,650,612	17.55
1987	3,159,121	21.5	67.92	2,145,570	69.41	2,192,628	18.21
1986	3,654,901	22.5	66.11	2,416,182	67.56	2,469,175	18.85
1985	2,911,382	23.5	64.26	1,870,922	65.67	1,911,956	19.47
1984	3,261,356	24.5	62.38	2,034,488	63.75	2,079,110	20.06
1983	2,530,699	25.5	60.47	1,530,187	61.79	1,563,748	20.63
1982	2,206,738	26.5	58.52	1,291,273	59.80	1,319,594	21.17
1981	2,989,360	27.5	56.53	1,689,965	57.77	1,727,030	21.69
1980	3,636,711	28.5	54.52	1,982,735	55.72	2,026,221	22.19
1979	2,852,002	29.5	52.48	1,496,664	53.63	1,529,490	22.66
1978	3,851,592	30.5	50.41	1,941,613	51.52	1,984,197	23.11
1977	3,541,256	31.5	48.32	1,711,206	49.38	1,748,736	23.53
1976	1,711,891	32.5	46.21	791,139	47.23	808,491	23.92
1975	1,610,300	33.5	44.09	710,008	45.06	725,580	24.30
1974	1,473,612	34.5	41.96	618,313	42.88	631,874	24.65
1973	1,402,782	35.5	39.82	558,588	40.69	570,839	24.97
1972	1,089,601	36.5	37.68	410,573	38.51	419,577	25.28
1971	1,128,076	37.5	35.55	400,997	36.33	409,792	25.56
1970	954,361	38.5	33.42	318,970	34.16	325,966	25.82
1969	633,909	39.5	31.31	198,506	32.00	202,860	26.07
1968	994,850	40.5	29.23	290,775	29.87	297,152	26.30
1967	823,498	41.5	27.17	223,753	27.77	228,660	26.51
1966	699,015	42.5	25.15	175,779	25.70	179,634	26.71
1965	474,052	43.5	23.16	109,805	23.67	112,213	26.90
1964	376,312	44.5	21.23	79,881	21.69	81,633	27.08

Computed Age Distribution Report

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Account: KEPCo 101/6 368 - KY
 Version: KEPCO DISTRIBUTION 2008
 Dispersion: 30 - R0.5

Age	Additions	Age 2009	Theoretical Survivors		Computed Survivors		Realized Life
			Percent	Amount	Percent	Amount	
1963	318,004	45.5	19.34	61,512	19.77	62,861	27.25
1962	290,851	46.5	17.52	50,948	17.90	52,066	27.41
1961	386,601	47.5	16.76	60,912	16.10	62,248	27.57
1960	377,379	48.5	14.06	53,071	14.37	54,235	27.74
1959	463,712	49.5	12.44	57,695	12.71	58,960	27.90
1958	493,518	50.5	10.90	53,793	11.14	54,973	28.06
1957	284,379	51.5	9.44	26,837	9.64	27,426	28.23
1956	694,523	52.5	8.05	65,942	8.23	57,169	28.41
1955	438,445	53.5	6.76	29,622	6.90	30,271	28.60
1954	265,710	54.5	5.54	14,713	5.66	15,035	28.79
1953	295,026	55.5	4.39	12,963	4.49	13,247	29.00
1952	222,457	56.5	3.32	7,386	3.39	7,548	29.21
1951	500,026	57.5	2.30	11,510	2.35	11,762	29.43
1950	463,556	58.5	1.34	6,203	1.37	6,338	29.65
1949	433,985	59.5	0.00		-0.00	(1)	29.75
1948	489,204	60.5	0.00		0.00		0.00
1947	491,803	61.5	0.00		0.00		0.00
1946	332,267	62.5	0.00		0.00		0.00
1945	161,745	63.5	0.00		0.00		0.00
1944	30,578	64.5	0.00		0.00		0.00
1943	6,171	65.5	0.00		0.00		0.00
1942	25,547	66.5	0.00		0.00		0.00
1941	126,413	67.5	0.00		0.00		0.00
1940	83,745	68.5	0.00		0.00		0.00
1939	107,763	69.5	0.00		0.00		0.00
1938	101,940	70.5	0.00		0.00		0.00
1937	94,566	71.5	0.00		0.00		0.00
1936	370,113	72.5	0.00		0.00		0.00
	138,700,031			96,432,538		98,415,054 *	

* Recorded Balance January 1, 2009: 98,415,054

Computed Age Distribution Report

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Account: KEPCo 101/6 369 - KY
 Version: KEPCO DISTRIBUTION 2008
 Dispersion: 25 - LO

Vintage	Additions	Age 2009	Theoretical Survivors		Computed Survivors		Realized Life
			Percent	Amount	Percent	Amount	
2008	2,815,091	0.5	99.68	2,806,195	100.00	2,815,092	0.50
2007	2,552,906	1.5	98.58	2,516,553	100.00	2,552,907	1.50
2006	2,696,436	2.5	97.11	2,618,374	100.00	2,696,437	2.50
2005	2,370,702	3.5	95.38	2,261,270	99.94	2,369,259	3.50
2004	2,034,573	4.5	93.47	1,901,756	97.94	1,992,576	4.45
2003	2,678,347	5.5	91.41	2,448,277	95.78	2,565,196	5.38
2002	1,907,359	6.5	89.23	1,701,898	93.49	1,783,174	6.29
2001	1,931,126	7.5	86.95	1,679,075	91.10	1,759,261	7.17
2000	2,680,192	8.5	84.59	2,267,255	88.63	2,375,529	8.02
1999	2,508,736	9.5	82.18	2,061,629	86.10	2,160,083	8.84
1998	795,815	10.5	79.72	634,440	83.53	664,738	9.64
1997	2,636,990	11.5	77.24	2,036,758	80.93	2,134,025	10.40
1996	816,459	12.5	74.74	610,246	78.31	639,389	11.14
1995	1,107,925	13.5	72.25	800,443	75.70	838,668	11.86
1994	1,352,925	14.5	69.76	943,733	73.09	988,801	12.55
1993	1,658,958	15.5	67.27	1,116,014	70.48	1,169,310	13.21
1992	1,167,486	16.5	64.80	756,542	67.90	792,671	13.85
1991	1,236,345	17.5	62.35	770,824	65.32	807,635	14.47
1990	945,888	18.5	59.91	566,700	62.77	593,764	15.06
1989	1,182,480	19.5	57.50	679,938	60.25	712,409	15.62
1988	888,422	20.5	55.12	489,680	57.75	513,065	16.17
1987	931,227	21.5	52.77	491,362	55.28	514,827	16.69
1986	733,462	22.5	50.45	370,082	52.86	387,672	17.20
1985	712,353	23.5	48.17	343,105	50.47	359,490	17.68
1984	807,358	24.5	45.92	370,771	48.12	388,477	18.14
1983	969,567	25.5	43.73	423,953	45.81	444,199	18.69
1982	716,135	26.5	41.57	297,726	43.56	311,944	19.02
1981	868,594	27.5	39.47	342,843	41.36	359,215	19.44
1980	864,476	28.5	37.42	323,478	39.21	338,926	19.84
1979	711,506	29.5	35.42	252,015	37.11	264,050	20.22
1978	830,075	30.5	33.48	277,876	35.07	291,146	20.60
1977	723,397	31.5	31.59	228,514	33.10	239,427	20.96
1976	596,974	32.5	29.76	177,665	31.18	186,150	21.32
1975	524,332	33.5	27.99	146,771	29.33	153,780	21.66
1974	483,476	34.5	26.28	127,077	27.54	133,145	22.00
1973	654,650	35.5	24.64	161,299	25.82	169,002	22.33
1972	683,325	36.5	23.06	157,541	24.16	165,064	22.66
1971	509,551	37.5	21.54	109,732	22.56	114,972	22.98
1970	423,419	38.5	20.08	85,014	21.04	89,074	23.30
1969	373,867	39.5	18.68	69,853	19.53	73,189	23.62
1968	328,382	40.5	17.35	56,987	18.18	59,709	23.93
1967	299,067	41.5	16.09	48,108	16.85	50,405	24.25
1966	231,692	42.5	14.88	34,478	15.59	36,124	24.56
1965	186,261	43.5	13.74	25,589	14.39	26,810	24.88
1964	161,204	44.5	12.66	20,400	13.26	21,375	25.20

Computed Age Distribution Report

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Account: KEPCo 101/6 369 - KY
 Version: KEPCO DISTRIBUTION 2008
 Dispersion: 25 - L0

Age	Additions	Age 2009	Theoretical Survivors		Computed Survivors		Realized Life
			Percent	Amount	Percent	Amount	
1963	125,832	45.5	11.63	14,638	12.19	15,337	25.52
1962	128,946	46.5	10.67	13,757	11.18	14,414	25.85
1961	166,728	47.5	9.76	16,276	10.23	17,053	26.18
1960	142,251	48.5	8.91	12,676	9.34	13,281	26.51
1959	148,227	49.5	0.00		-0.00	(i)	24.75
1958	169,015	50.5	0.00		0.00		0.00
1957	144,373	51.5	0.00		0.00		0.00
1956	136,713	52.5	0.00		0.00		0.00
1955	113,139	53.5	0.00		0.00		0.00
1954	115,530	54.5	0.00		0.00		0.00
1953	124,065	55.5	0.00		0.00		0.00
1952	128,566	56.5	0.00		0.00		0.00
1951	139,833	57.5	0.00		0.00		0.00
1950	161,544	58.5	0.00		0.00		0.00
1949	219,751	59.5	0.00		0.00		0.00
1948	243,279	60.5	0.00		0.00		0.00
1947	218,255	61.5	0.00		0.00		0.00
1946	112,216	62.5	0.00		0.00		0.00
1945	39,254	63.5	0.00		0.00		0.00
1944	14,444	64.5	0.00		0.00		0.00
1943	11,021	65.5	0.00		0.00		0.00
1942	29,900	66.5	0.00		0.00		0.00
1941	25,986	67.5	0.00		0.00		0.00
1940	54,016	68.5	0.00		0.00		0.00
1939	45,804	69.5	0.00		0.00		0.00
1938	46,593	70.5	0.00		0.00		0.00
1937	37,203	71.5	0.00		0.00		0.00
1936	143,212	72.5	0.00		0.00		0.00
	55,475,216			36,667,109		38,162,243 *	

* Recorded Balance January 1, 2009: 38,162,243

Computed Age Distribution Report

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Account: KEPCo 101/6 370 - KY
 Version: KEPCO DISTRIBUTION 2008
 Dispersion: 17 - S6

Vintage	Additions	Age 2009	Theoretical Survivors		Computed Survivors		Realized Life
			Percent	Amount	Percent	Amount	
2008	2,963,121	0.5	100.00	2,963,121	63.03	1,867,578	0.41
2007	2,353,738	1.5	100.00	2,353,738	63.03	1,483,500	1.22
2006	14,223,681	2.5	100.00	14,223,681	63.03	8,964,813	2.04
2005	4,183,747	3.5	100.00	4,183,747	63.03	2,636,906	2.85
2004	1,006,674	4.5	100.00	1,006,674	63.03	634,481	3.67
2003	617,066	5.5	100.00	617,066	63.03	388,921	4.48
2002	489,075	6.5	100.00	489,075	63.03	308,252	5.30
2001	648,901	7.5	100.00	648,901	63.03	408,986	6.11
2000	1,514,864	8.5	100.00	1,514,864	63.03	954,779	6.93
1999	980,778	9.5	100.00	980,778	63.03	618,159	7.74
1998	1,324,431	10.5	100.00	1,324,431	63.03	834,754	8.56
1997	1,105,728	11.5	100.00	1,105,728	63.03	696,911	9.37
1996	669,427	12.5	99.98	669,325	63.02	421,858	10.19
1995	850,393	13.5	99.71	847,953	62.85	534,443	10.99
1994	1,413,819	14.5	97.46	1,377,840	61.42	868,416	11.70
1993	1,029,446	15.5	87.77	903,577	55.32	569,500	12.04
1992	999,844	16.5	65.06	650,464	41.00	409,970	11.63
1991	1,093,280	17.5	34.94	382,030	22.02	240,783	10.68
1990	1,278,153	18.5	12.23	156,278	7.71	98,498	9.96
1989	1,133,142	19.5	2.54	28,836	1.60	18,174	9.91
1988	1,262,548	20.5	0.29	3,617	0.18	2,279	10.27
1987	1,107,129	21.5	0.02	171	0.01	108	10.75
1986	1,253,695	22.5	0.00		-0.00	(1)	11.25
1985	1,086,299	23.5	0.00		0.00		0.00
1984	1,266,454	24.5	0.00		0.00		0.00
1983	1,584,355	25.5	0.00		0.00		0.00
1982	1,226,850	26.5	0.00		0.00		0.00
1981	1,149,365	27.5	0.00		0.00		0.00
1980	890,564	28.5	0.00		0.00		0.00
1979	814,814	29.5	0.00		0.00		0.00
1978	926,839	30.5	0.00		0.00		0.00
1977	940,534	31.5	0.00		0.00		0.00
1976	667,327	32.5	0.00		0.00		0.00
1975	497,286	33.5	0.00		0.00		0.00
1974	480,510	34.5	0.00		0.00		0.00
1973	423,051	35.5	0.00		0.00		0.00
1972	371,979	36.5	0.00		0.00		0.00
1971	279,535	37.5	0.00		0.00		0.00
1970	255,663	38.5	0.00		0.00		0.00
1969	205,326	39.5	0.00		0.00		0.00
1968	181,449	40.5	0.00		0.00		0.00
1967	181,316	41.5	0.00		0.00		0.00
1966	145,871	42.5	0.00		0.00		0.00
1965	209,404	43.5	0.00		0.00		0.00
1964	184,491	44.5	0.00		0.00		0.00

Computed Age Distribution Report

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Account: KEPCo 101/6 370 - KY
 Version: KEPCO DISTRIBUTION 2008
 Dispersion: 17 - S6

Vintage	Additions	Age 2009	Theoretical Survivors		Computed Survivors		Realized Life
			Percent	Amount	Percent	Amount	
1963	169,199	45.5	0.00		0.00		0.00
1962	139,771	46.5	0.00		0.00		0.00
1961	122,140	47.5	0.00		0.00		0.00
1960	128,169	48.5	0.00		0.00		0.00
1959	156,474	49.5	0.00		0.00		0.00
1958	131,604	50.5	0.00		0.00		0.00
1957	153,490	51.5	0.00		0.00		0.00
1956	128,652	52.5	0.00		0.00		0.00
1955	118,059	53.5	0.00		0.00		0.00
1954	81,155	54.5	0.00		0.00		0.00
1953	119,866	55.5	0.00		0.00		0.00
1952	94,922	56.5	0.00		0.00		0.00
1951	155,600	57.5	0.00		0.00		0.00
1950	177,105	58.5	0.00		0.00		0.00
1949	195,423	59.5	0.00		0.00		0.00
1948	260,771	60.5	0.00		0.00		0.00
1947	271,471	61.5	0.00		0.00		0.00
1946	139,554	62.5	0.00		0.00		0.00
1945	60,653	63.5	0.00		0.00		0.00
1944	25,218	64.5	0.00		0.00		0.00
1943	10,056	65.5	0.00		0.00		0.00
1942	18,454	66.5	0.00		0.00		0.00
1941	84,476	67.5	0.00		0.00		0.00
1940	59,490	68.5	0.00		0.00		0.00
1939	48,100	69.5	0.00		0.00		0.00
1938	52,663	70.5	0.00		0.00		0.00
1937	50,591	71.5	0.00		0.00		0.00
1936	370,928	72.5	0.00		0.00		0.00
	60,996,016			36,431,895		22,962,066 *	

* Recorded Balance January 1, 2009: 22,962,066

Computed Age Distribution Report

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Account: KEPCo 101/6 371 - KY
 Version: KEPCO DISTRIBUTION 2008
 Dispersion: 14 - R0.5

Vintage	Additions	Age 2009	Theoretical Survivors		Computed Survivors		Realized Life
			Percent	Amount	Percent	Amount	
2008	1,469,673	0.5	98.64	1,449,650	99.83	1,467,152	0.50
2007	1,459,010	1.5	95.84	1,398,380	97.00	1,415,263	1.48
2006	1,577,577	2.5	92.96	1,466,491	94.08	1,484,196	2.43
2005	1,768,968	3.5	89.98	1,591,753	91.07	1,610,970	3.34
2004	1,563,148	4.5	86.92	1,358,653	87.97	1,375,056	4.23
2003	2,356,246	5.5	83.76	1,973,662	84.77	1,997,490	5.08
2002	1,536,211	6.5	80.51	1,236,729	81.48	1,251,660	5.90
2001	858,732	7.5	77.13	662,311	78.05	670,307	6.68
2000	1,331,176	8.5	73.61	979,884	74.60	991,715	7.42
1999	1,742,973	9.5	69.94	1,219,033	70.78	1,233,750	8.11
1998	600,987	10.5	66.11	397,300	66.91	402,097	8.76
1997	1,583,946	11.5	62.11	983,791	62.86	995,668	9.36
1996	496,928	12.5	57.95	287,978	58.65	291,455	9.92
1995	559,153	13.5	53.65	299,973	54.30	303,595	10.41
1994	1,062,578	14.5	49.22	522,998	49.81	529,312	10.86
1993	1,380,740	15.5	44.70	617,181	45.24	624,632	11.26
1992	843,872	16.5	40.13	338,610	40.61	342,698	11.60
1991	757,210	17.5	35.55	269,165	35.98	272,415	11.90
1990	574,638	18.5	31.02	178,226	31.39	180,377	12.15
1989	673,733	19.5	26.59	179,139	26.91	181,301	12.37
1988	464,215	20.5	22.33	103,648	22.60	104,899	12.57
1987	478,198	21.5	18.29	87,474	18.51	88,530	12.74
1986	500,633	22.5	14.54	72,788	14.71	73,667	12.91
1985	430,816	23.5	11.12	47,886	11.25	48,464	13.07
1984	455,174	24.5	8.05	36,663	8.15	37,106	13.25
1983	359,728	25.5	5.37	19,314	5.43	19,546	13.44
1982	259,270	26.5	3.02	7,839	3.06	7,934	13.66
1981	301,789	27.5	0.00		-0.00	(1)	13.75
1980	217,442	28.5	0.00		0.00		0.00
1979	195,902	29.5	0.00		0.00		0.00
1978	183,648	30.5	0.00		0.00		0.00
1977	122,908	31.5	0.00		0.00		0.00
1976	245,454	32.5	0.00		0.00		0.00
1975	182,106	33.5	0.00		0.00		0.00
1974	198,910	34.5	0.00		0.00		0.00
1973	226,725	35.5	0.00		0.00		0.00
1972	193,516	36.5	0.00		0.00		0.00
1971	118,336	37.5	0.00		0.00		0.00
1970	118,346	38.5	0.00		0.00		0.00
1969	134,430	39.5	0.00		0.00		0.00
1968	94,059	40.5	0.00		0.00		0.00
1967	112,403	41.5	0.00		0.00		0.00
1966	83,111	42.5	0.00		0.00		0.00
1965	113,528	43.5	0.00		0.00		0.00
1964	95,784	44.5	0.00		0.00		0.00

Computed Age Distribution Report

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Account: KEPCo 101/6 371 - KY
 Version: KEPCO DISTRIBUTION 2008
 Dispersion: 14 - R0.5

vintage	Additions	Age 2009	Theoretical Survivors		Computed Survivors		Realized Life
			Percent	Amount	Percent	Amount	
1963	117,412	45.5	0.00		0.00		0.00
1962	155,649	46.5	0.00		0.00		0.00
1961	133,773	47.5	0.00		0.00		0.00
1960	52,064	48.5	0.00		0.00		0.00
1959	3,085	49.5	0.00		0.00		0.00
1957	62	51.5	0.00		0.00		0.00
1956	46	52.5	0.00		0.00		0.00
1953	45	55.5	0.00		0.00		0.00
1950	323	58.5	0.00		0.00		0.00
30,546,389				17,786,518		18,001,253 *	

* Recorded Balance January 1, 2009: 18,001,253

Computed Age Distribution Report

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Account: KEPCo 101/6 373 - KY
 Version: KEPCO DISTRIBUTION 2008
 Dispersion: 24 - L0

Vintage	Additions	Age 2009	Theoretical Survivors		Computed Survivors		Realized Life
			Percent	Amount	Percent	Amount	
2008	141,474	0.5	99.66	141,000	100.00	141,475	0.50
2007	173,112	1.5	98.49	170,500	100.00	173,113	1.50
2006	151,500	2.5	96.93	146,855	100.00	151,501	2.50
2005	155,045	3.5	95.11	147,470	100.00	155,046	3.50
2004	139,549	4.5	93.09	129,913	100.00	139,550	4.50
2003	114,834	5.5	90.92	104,407	100.00	114,835	5.50
2002	90,680	6.5	88.62	80,359	100.00	90,681	6.50
2001	105,554	7.5	86.22	91,008	100.00	105,555	7.50
2000	77,936	8.5	83.74	65,266	98.65	76,888	8.44
1999	88,549	9.5	81.21	71,911	95.67	84,715	9.29
1998	41,175	10.5	78.64	32,379	92.64	38,145	10.11
1997	40,819	11.5	76.04	31,040	89.58	36,567	10.90
1996	50,186	12.5	73.44	36,858	86.52	43,421	11.66
1995	65,504	13.5	70.84	46,406	83.46	54,669	12.38
1994	98,733	14.5	68.25	67,389	80.41	79,388	13.08
1993	183,145	15.5	65.68	120,281	77.37	141,698	13.75
1992	13,549	16.5	63.11	8,551	74.35	10,074	14.38
1991	62,428	17.5	60.57	37,812	71.36	44,546	14.99
1990	213,752	18.5	58.05	124,087	68.39	146,182	15.58
1989	347,755	19.5	55.56	193,222	65.46	227,627	16.13
1988	206,152	20.5	53.11	109,480	62.56	128,973	16.66
1987	203,890	21.5	50.69	103,344	59.71	121,745	17.17
1986	209,086	22.5	48.31	101,002	56.91	118,986	17.65
1985	120,997	23.5	45.97	55,623	54.16	65,527	18.11
1984	50,621	24.5	43.68	22,112	51.46	26,049	18.55
1983	93,110	25.5	41.44	38,586	48.82	45,457	18.97
1982	184,014	26.5	39.26	72,235	46.24	85,097	19.38
1981	142,598	27.5	37.12	52,939	43.73	62,365	19.76
1980	80,303	28.5	35.05	28,148	41.29	33,160	20.13
1979	22,164	29.5	33.04	7,323	38.92	8,627	20.49
1978	56,734	30.5	31.09	17,638	36.62	20,779	20.84
1977	19,464	31.5	29.20	5,684	34.40	6,696	21.17
1976	16,853	32.5	27.38	4,614	32.26	5,436	21.49
1975	41,522	33.5	25.63	10,640	30.19	12,535	21.81
1974	37,035	34.5	23.94	8,866	28.20	10,444	22.11
1973	79,104	35.5	22.32	17,655	26.29	20,798	22.42
1972	17,862	36.5	20.77	3,710	24.47	4,370	22.72
1971	29,314	37.5	19.29	5,654	22.72	6,661	23.01
1970	82,272	38.5	17.87	14,705	21.06	17,323	23.30
1969	54,853	39.5	16.53	9,066	19.47	10,680	23.60
1968	62,051	40.5	15.25	9,464	17.97	11,149	23.89
1967	148,123	41.5	14.04	20,799	16.54	24,501	24.18
1966	65,587	42.5	12.90	8,459	15.19	9,965	24.48
1965	74,139	43.5	11.82	8,764	13.92	10,323	24.78
1964	33,854	44.5	10.81	3,658	12.73	4,310	25.08

Computed Age Distribution Report

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Account: KEPCo 101/6 373 - KY
 Version: KEPCO DISTRIBUTION 2008
 Dispersion: 24 - L0

Vintage	Additions	Age 2009	Theoretical Survivors		Computed Survivors		Realized Life
			Percent	Amount	Percent	Amount	
1963	60,199	45.5	9.85	5,932	11.61	6,988	25.39
1962	47,237	46.5	8.96	4,234	10.56	4,987	25.70
1961	47,565	47.5	0.00		-0.00	(1)	23.75
1960	34,406	48.5	0.00		0.00		0.00
1959	48,955	49.5	0.00		0.00		0.00
1958	37,190	50.5	0.00		0.00		0.00
1957	25,341	51.5	0.00		0.00		0.00
1956	16,379	52.5	0.00		0.00		0.00
1955	13,067	53.5	0.00		0.00		0.00
1954	22,190	54.5	0.00		0.00		0.00
1953	31,804	55.5	0.00		0.00		0.00
1952	31,861	56.5	0.00		0.00		0.00
1951	45,371	57.5	0.00		0.00		0.00
1950	34,099	58.5	0.00		0.00		0.00
1949	28,081	59.5	0.00		0.00		0.00
1948	23,457	60.5	0.00		0.00		0.00
1947	10,446	61.5	0.00		0.00		0.00
1946	6,221	62.5	0.00		0.00		0.00
1945	2,011	63.5	0.00		0.00		0.00
44	4,620	64.5	0.00		0.00		0.00
1943	1,495	65.5	0.00		0.00		0.00
1942	13,088	66.5	0.00		0.00		0.00
1941	12,616	67.5	0.00		0.00		0.00
1940	10,369	68.5	0.00		0.00		0.00
1939	6,365	69.5	0.00		0.00		0.00
1938	9,692	70.5	0.00		0.00		0.00
1937	16,031	71.5	0.00		0.00		0.00
1936	126,232	72.5	0.00		0.00		0.00
	5,253,369			2,597,045		2,939,603 *	

* Recorded Balance January 1, 2009: 2,939,603

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KENTUCKY POWER COMPANY
DEPRECIATION STUDY AS OF 12-31-08
DISTRIBUTION PLANT WORKPAPERS

CALCULATED RESERVE

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Depreciation Reserve Summary

Account: KEPCo 101/6 360 Land Rights
 Scenario: KEPCO DISTRIBUTION 2008 NEW
 Version: 75 - R4
 Average Net Salvage Rate: 0.00%
 Future Net Salvage Rate: 0.00%

Broad Group Procedure

January 1, 2009

	Plant Amt	Depreciation Reserve		Net Plant	
		Amount	Ratio	Amount	Ratio
Recorded	\$4,178,634.88	\$927,055.90	0.2219	\$3,251,578.98	0.7781
Computed	\$4,178,634.88	\$1,085,983.48	0.2599	\$3,092,651.40	0.7401
Difference		(\$158,927.58)	-0.0380	\$158,927.58	0.0380

Generation Arrangement Report

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Account: KEPCo 101/6 360 Land Rights

Dispersion: 75.00 - R4

Age Net Salvage Rate: 0.00%

Future Net Salvage Rate: 0.00%

Broad Group Procedure

January 1, 2009

Vintage	Age	Surviving Plant	Avg Life	Remaining Life	Net Plant Ratio	Alloc Factor	Computed Net Plant	Accrual
2006	2.50	\$174,821.73	75.00	72.50	0.9667	1.0000	\$169,000.07	\$2,330.96
2005	3.50	\$117,956.02	75.00	71.50	0.9534	1.0000	\$112,457.91	\$1,572.75
2004	4.50	\$100,775.44	75.00	70.51	0.9401	1.0000	\$94,735.75	\$1,343.67
2003	5.50	\$188,981.14	75.00	69.51	0.9268	1.0000	\$175,140.63	\$2,519.75
2002	6.50	\$131,307.26	75.00	68.51	0.9135	1.0000	\$119,943.50	\$1,750.76
2001	7.50	\$106,531.58	75.00	67.51	0.9002	1.0000	\$95,895.43	\$1,420.42
2000	8.50	\$315,016.24	75.00	66.51	0.8869	1.0000	\$279,376.88	\$4,200.22
1999	9.50	\$3,677.00	75.00	65.52	0.8736	1.0000	\$3,212.17	\$49.03
1998	10.50	\$108,643.00	75.00	64.52	0.8603	1.0000	\$93,466.56	\$1,448.57
1997	11.50	\$219,539.50	75.00	63.53	0.8470	1.0000	\$185,957.75	\$2,927.19
1996	12.50	\$53,347.00	75.00	62.53	0.8338	1.0000	\$44,479.25	\$711.29
1995	13.50	\$106,401.00	75.00	61.54	0.8205	1.0000	\$87,304.91	\$1,418.68
1994	14.50	\$14,023.00	75.00	60.55	0.8073	1.0000	\$11,320.69	\$186.97
1993	15.50	\$49,128.00	75.00	59.56	0.7941	1.0000	\$39,011.49	\$655.04
1992	16.50	\$94,764.00	75.00	58.57	0.7809	1.0000	\$73,998.49	\$1,263.52
1991	17.50	\$76,154.00	75.00	57.58	0.7677	1.0000	\$58,462.50	\$1,015.39
1990	18.50	\$54,838.00	75.00	56.59	0.7545	1.0000	\$41,376.07	\$731.17
1989	19.50	\$31,201.00	75.00	55.60	0.7414	1.0000	\$23,131.83	\$416.01
1988	20.50	\$26,380.00	75.00	54.62	0.7283	1.0000	\$19,211.53	\$351.73
1987	21.50	\$19,016.00	75.00	53.64	0.7152	1.0000	\$13,599.47	\$253.55
1986	22.50	\$47,346.00	75.00	52.66	0.7021	1.0000	\$33,242.10	\$631.28
1985	23.50	\$20,719.00	75.00	51.68	0.6891	1.0000	\$14,277.08	\$276.25
1984	24.50	\$25,934.00	75.00	50.71	0.6761	1.0000	\$17,533.37	\$345.79
1983	25.50	\$66,861.00	75.00	49.73	0.6631	1.0000	\$44,337.46	\$891.48
1982	26.50	\$48,942.00	75.00	48.77	0.6502	1.0000	\$31,823.06	\$652.56
1981	27.50	\$38,508.00	75.00	47.80	0.6373	1.0000	\$24,542.67	\$513.44
1980	28.50	\$24,590.00	75.00	46.84	0.6245	1.0000	\$16,357.22	\$327.87
1979	29.50	\$1,913,234.00	75.00	45.88	0.6118	1.0000	\$1,170,455.58	\$25,509.79
		\$4,178,634.88	75.00	55.51	0.7401	1.0000	\$3,092,651.40	\$55,715.13

Depreciation Reserve Summary

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Account: KEPCo 101/6 361 - KY
 Scenario: KEPCO DISTRIBUTION 2008 NEW
 Version: 75 - L2
 Average Net Salvage Rate: 10.00%
 Future Net Salvage Rate: 10.00%

Broad Group Procedure

January 1, 2009

	Plant Amt	Depreciation Reserve		Net Plant	
		Amount	Ratio	Amount	Ratio
Recorded	\$4,273,116.69	\$749,460.89	0.1754	\$3,096,344.13	0.7246
Computed	\$4,273,116.69	\$877,942.90	0.2055	\$2,967,862.12	0.6945
Difference		(\$128,482.01)	-0.0301	\$128,482.01	0.0301

Generation Arrangement Report

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Account: KEPCo 101/6 361 - KY
 Dispersion: 75.00 - L2
 Average Net Salvage Rate: 10.00%
 Future Net Salvage Rate: 10.00%
 Broad Group Procedure
 January 1, 2009

Vintage	Age	Surviving Plant	Avg Life	Remaining Life	Net Plant Ratio	Alloc Factor	Computed Net Plant	Accrual
2008	0.50	\$121,240.22	75.00	74.50	0.8940	1.0000	\$108,388.39	\$1,454.88
2006	3.50	\$8,634.85	75.00	71.51	0.8581	1.0000	\$7,409.48	\$103.62
2003	5.50	\$395,783.91	75.00	69.53	0.8344	1.0000	\$330,236.37	\$4,749.41
2002	6.50	\$38,513.72	75.00	68.55	0.8226	1.0000	\$31,681.44	\$462.16
2001	7.50	\$7,027.54	75.00	67.58	0.8109	1.0000	\$5,698.75	\$84.33
2000	8.50	\$100,752.20	75.00	66.61	0.7993	1.0000	\$80,532.22	\$1,209.03
1999	9.50	\$387,262.85	75.00	65.65	0.7878	1.0000	\$305,071.32	\$4,647.15
1998	10.50	\$30,887.03	75.00	64.69	0.7763	1.0000	\$23,978.77	\$370.64
1997	11.50	\$67,892.00	75.00	63.75	0.7650	1.0000	\$51,937.75	\$814.70
1996	12.50	\$35,578.00	75.00	62.81	0.7537	1.0000	\$26,816.66	\$426.94
1995	13.50	\$604,605.00	75.00	61.88	0.7426	1.0000	\$448,988.83	\$7,255.26
1994	14.50	\$104,061.00	75.00	60.97	0.7316	1.0000	\$76,129.94	\$1,248.73
1993	15.50	\$254,730.00	75.00	60.05	0.7206	1.0000	\$183,568.28	\$3,056.76
1992	16.50	\$112,019.00	75.00	59.15	0.7098	1.0000	\$79,514.72	\$1,344.23
1991	17.50	\$344,187.00	75.00	58.26	0.6991	1.0000	\$240,630.33	\$4,130.24
1990	18.50	\$32,711.00	75.00	57.37	0.6885	1.0000	\$22,521.37	\$392.53
1989	19.50	\$33,374.00	75.00	56.50	0.6780	1.0000	\$22,627.98	\$400.49
1988	20.50	\$35,799.00	75.00	55.64	0.6676	1.0000	\$23,900.34	\$429.59
1987	21.50	\$127,890.00	75.00	54.78	0.6573	1.0000	\$84,063.81	\$1,534.68
1986	22.50	\$148,205.00	75.00	53.93	0.6471	1.0000	\$95,910.27	\$1,778.46
1985	23.50	\$119,083.00	75.00	53.09	0.6371	1.0000	\$75,864.68	\$1,429.00
1984	24.50	\$10,503.00	75.00	52.26	0.6271	1.0000	\$6,586.10	\$126.04
1983	25.50	\$7,053.00	75.00	51.43	0.6172	1.0000	\$4,353.24	\$84.64
1982	26.50	\$62,465.00	75.00	50.62	0.6075	1.0000	\$37,945.95	\$749.58
1981	27.50	\$92,865.00	75.00	49.82	0.5978	1.0000	\$55,517.51	\$1,114.38
1980	28.50	\$373,477.00	75.00	49.03	0.5884	1.0000	\$219,753.51	\$4,481.72
1979	29.50	\$5,950.00	75.00	48.26	0.5791	1.0000	\$3,445.80	\$71.40
1978	30.50	\$44,891.00	75.00	47.50	0.5700	1.0000	\$25,587.22	\$538.69
1977	31.50	\$83,665.00	75.00	46.76	0.5611	1.0000	\$46,945.95	\$1,003.98
1976	32.50	\$24,921.00	75.00	46.04	0.5524	1.0000	\$13,767.45	\$299.05
1975	33.50	\$72,704.00	75.00	45.33	0.5439	1.0000	\$39,545.89	\$872.45
1974	34.50	\$62,865.00	75.00	44.64	0.5357	1.0000	\$33,678.19	\$754.38
1973	35.50	\$44,691.00	75.00	43.98	0.5277	1.0000	\$23,585.05	\$536.29

Generation Arrangement Report

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Account: KEPCo 101/6 361 - KY
 Dispersion: 75.00 - L2
 Average Net Salvage Rate: 10.00%
 Future Net Salvage Rate: 10.00%

Broad Group Procedure
 January 1, 2009

Vintage	Age	Surviving Plant	Avg Life	Remaining Life	Net Plant Ratio	Alloc Factor	Computed Net Plant	Accrual
1972	36.50	\$49,794.00	75.00	43.33	0.5199	1.0000	\$25,888.78	\$597.53
1971	37.50	\$60,176.00	75.00	42.70	0.5124	1.0000	\$30,835.90	\$722.11
1970	38.50	\$13,257.00	75.00	42.10	0.5052	1.0000	\$6,696.84	\$159.08
1969	39.50	\$6,970.00	75.00	41.50	0.4981	1.0000	\$3,471.48	\$83.64
1968	40.50	\$20,793.00	75.00	40.94	0.4913	1.0000	\$10,216.05	\$249.52
1967	41.50	\$15,108.00	75.00	40.39	0.4847	1.0000	\$7,323.01	\$181.30
1966	42.50	\$31,096.00	75.00	39.86	0.4783	1.0000	\$14,873.67	\$373.15
1965	43.50	\$1,812.70	75.00	39.35	0.4722	1.0000	\$855.97	\$21.75
1964	44.50	\$495.00	75.00	38.86	0.4663	1.0000	\$230.82	\$5.94
1963	45.50	\$5,202.00	75.00	38.38	0.4606	1.0000	\$2,395.86	\$62.42
1962	46.50	\$190.00	75.00	37.92	0.4551	1.0000	\$86.47	\$2.28
1961	47.50	\$1,585.00	75.00	37.48	0.4498	1.0000	\$712.91	\$19.02
1960	48.50	\$291.00	75.00	37.05	0.4446	1.0000	\$129.39	\$3.49
1959	49.50	\$193.00	75.00	36.64	0.4397	1.0000	\$84.86	\$2.32
1957	51.50	\$6,356.00	75.00	35.86	0.4303	1.0000	\$2,735.10	\$76.27
1956	52.50	\$5,955.00	75.00	35.49	0.4259	1.0000	\$2,536.12	\$71.46
1955	53.50	\$701.00	75.00	35.13	0.4216	1.0000	\$295.53	\$8.41
1954	54.50	\$4,906.00	75.00	34.78	0.4174	1.0000	\$2,047.74	\$58.87
1953	55.50	\$9,315.00	75.00	34.45	0.4134	1.0000	\$3,850.54	\$111.78
1952	56.50	\$4,482.00	75.00	34.12	0.4095	1.0000	\$1,835.17	\$53.78
1951	57.50	\$2,866.00	75.00	33.80	0.4056	1.0000	\$1,162.58	\$34.39
1950	58.50	\$3,771.63	75.00	33.50	0.4020	1.0000	\$1,516.03	\$46.26
1949	59.50	\$3,862.00	75.00	33.20	0.3984	1.0000	\$1,538.45	\$46.34
1948	60.50	\$5,174.00	75.00	32.90	0.3949	1.0000	\$2,043.00	\$62.09
1947	61.50	\$2,508.00	75.00	32.62	0.3914	1.0000	\$981.71	\$30.10
1946	62.50	\$42.00	75.00	32.34	0.3881	1.0000	\$16.30	\$0.50
1945	63.50	\$946.00	75.00	32.07	0.3848	1.0000	\$364.04	\$11.35
1943	65.50	\$1,672.00	75.00	31.54	0.3784	1.0000	\$632.76	\$20.06
1942	66.50	\$977.00	75.00	31.28	0.3754	1.0000	\$366.72	\$11.72
1941	67.50	\$140.00	75.00	31.02	0.3723	1.0000	\$52.12	\$1.68
1940	68.50	\$3,539.00	75.00	30.77	0.3693	1.0000	\$1,306.81	\$42.47
1938	70.50	\$12,655.04	75.00	30.28	0.3633	1.0000	\$4,597.80	\$151.86
		\$4,273,116.69	75.00	57.88	0.6945	1.0000	\$2,967,862.12	\$51,277.40

Depreciation Reserve Summary

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Account: KEPCo 101/6 362 - KY
 Scenario: KEPCO DISTRIBUTION 2008 NEW
 Version: 32 - R1
 Average Net Salvage Rate: 10.00%
 Future Net Salvage Rate: 10.00%

Broad Group Procedure

January 1, 2009

	Plant Amt	Depreciation Reserve		Net Plant	
		Amount	Ratio	Amount	Ratio
Recorded	\$48,811,222.57	\$11,516,934.53	0.2359	\$32,413,165.78	0.6641
Computed	\$48,811,222.57	\$13,491,312.23	0.2764	\$30,438,788.08	0.6236
Difference		(\$1,974,377.70)	-0.0404	\$1,974,377.70	0.0404

Generation Arrangement Report

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Account: KEPCo 101/6 362 - KY
 Dispersion: 32.00 - R1
 Average Net Salvage Rate: 10.00%
 Future Net Salvage Rate: 10.00%
 Broad Group Procedure
 January 1, 2009

Vintage	Age	Surviving Plant	Avg Life	Remaining Life	Net Plant Ratio	Alloc Factor	Computed Net Plant	Accrual
2008	0.50	\$1,007,391.55	32.00	31.53	0.8896	1.0000	\$896,135.50	\$28,332.89
2007	1.50	\$2,719,291.66	32.00	30.89	0.8689	1.0000	\$2,362,663.34	\$76,480.08
2006	2.50	\$3,162,171.87	32.00	30.16	0.8483	1.0000	\$2,682,615.85	\$88,936.08
2005	3.50	\$3,574,863.11	32.00	29.44	0.8280	1.0000	\$2,960,076.92	\$100,543.02
2004	4.50	\$722,443.48	32.00	28.73	0.8079	1.0000	\$583,656.43	\$20,318.72
2003	5.50	\$1,124,197.05	32.00	28.02	0.7879	1.0000	\$885,790.59	\$31,618.04
2002	6.50	\$727,429.09	32.00	27.31	0.7681	1.0000	\$558,763.85	\$20,458.94
2001	7.50	\$2,095,432.80	32.00	26.61	0.7485	1.0000	\$1,568,431.66	\$58,934.05
2000	8.50	\$1,754,288.96	32.00	25.92	0.7290	1.0000	\$1,278,862.97	\$49,339.38
1999	9.50	\$1,086,152.71	32.00	25.23	0.7096	1.0000	\$770,777.21	\$30,548.04
1998	10.50	\$829,599.58	32.00	24.55	0.6904	1.0000	\$572,777.94	\$23,332.49
1997	11.50	\$1,706,473.99	32.00	23.87	0.6713	1.0000	\$1,146,623.25	\$47,994.58
1996	12.50	\$1,815,306.06	32.00	23.20	0.6524	1.0000	\$1,184,285.99	\$51,055.48
1995	13.50	\$4,481,127.59	32.00	22.53	0.6336	1.0000	\$2,839,256.04	\$126,031.71
1994	14.50	\$1,330,971.72	32.00	21.87	0.6150	1.0000	\$818,534.69	\$37,433.58
1993	15.50	\$3,295,948.31	32.00	21.21	0.5966	1.0000	\$1,966,240.29	\$92,698.55
1992	16.50	\$1,031,364.53	32.00	20.56	0.5783	1.0000	\$596,459.17	\$29,007.13
1991	17.50	\$1,477,699.38	32.00	19.92	0.5603	1.0000	\$827,991.16	\$41,560.30
1990	18.50	\$396,281.22	32.00	19.29	0.5426	1.0000	\$215,007.76	\$11,145.41
1989	19.50	\$515,611.35	32.00	18.67	0.5251	1.0000	\$270,721.95	\$14,501.57
1988	20.50	\$294,675.51	32.00	18.06	0.5078	1.0000	\$149,635.77	\$8,287.75
1987	21.50	\$1,691,241.59	32.00	17.45	0.4908	1.0000	\$830,108.38	\$47,566.17
1986	22.50	\$1,192,654.37	32.00	16.86	0.4741	1.0000	\$665,483.40	\$33,543.40
1985	23.50	\$639,499.84	32.00	16.28	0.4577	1.0000	\$292,721.69	\$17,985.93
1984	24.50	\$646,616.75	32.00	15.70	0.4416	1.0000	\$285,558.04	\$18,186.10
1983	25.50	\$706,844.36	32.00	15.14	0.4258	1.0000	\$300,988.85	\$19,880.00
1982	26.50	\$995,099.53	32.00	14.59	0.4103	1.0000	\$408,315.12	\$27,987.17
1981	27.50	\$692,905.42	32.00	14.05	0.3951	1.0000	\$273,796.44	\$19,487.96
1980	28.50	\$2,456,583.25	32.00	13.52	0.3803	1.0000	\$934,166.37	\$69,091.40
1979	29.50	\$428,316.69	32.00	13.00	0.3657	1.0000	\$156,634.75	\$12,046.41
1978	30.50	\$911,780.56	32.00	12.50	0.3514	1.0000	\$320,431.49	\$25,643.83
1977	31.50	\$697,721.10	32.00	12.00	0.3375	1.0000	\$235,461.11	\$19,623.41
1976	32.50	\$146,004.67	32.00	11.51	0.3238	1.0000	\$47,276.29	\$4,106.38

Generation Arrangement Report

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Account: KEPCo 101/6 362 - KY
 Dispersion: 32.00 - R1
 Average Net Salvage Rate: 10.00%
 Future Net Salvage Rate: 10.00%

Broad Group Procedure
 January 1, 2009

Vintage	Age	Surviving Plant	Avg Life	Remaining Life	Net Plant Ratio	Alloc Factor	Computed Net Plant	Accrual
1975	33.50	\$331,376.93	32.00	11.04	0.3104	1.0000	\$102,869.66	\$9,319.98
1974	34.50	\$284,028.75	32.00	10.57	0.2974	1.0000	\$84,458.07	\$7,988.31
1973	35.50	\$429,163.76	32.00	10.12	0.2846	1.0000	\$122,125.60	\$12,070.23
1972	36.50	\$507,404.33	32.00	9.67	0.2721	1.0000	\$138,041.42	\$14,270.75
1971	37.50	\$268,376.72	32.00	9.24	0.2598	1.0000	\$69,729.42	\$7,548.10
1970	38.50	\$185,400.70	32.00	8.81	0.2479	1.0000	\$45,952.72	\$5,214.39
1969	39.50	\$20,274.01	32.00	8.40	0.2361	1.0000	\$4,787.67	\$570.21
1968	40.50	\$124,994.58	32.00	7.99	0.2247	1.0000	\$28,087.26	\$3,515.47
1967	41.50	\$111,324.60	32.00	7.59	0.2135	1.0000	\$23,769.58	\$3,131.00
1966	42.50	\$53,681.54	32.00	7.20	0.2026	1.0000	\$10,874.03	\$1,509.79
1965	43.50	\$987.00	32.00	6.82	0.1919	1.0000	\$189.37	\$27.76
1964	44.50	\$19,288.02	32.00	6.45	0.1814	1.0000	\$3,498.58	\$542.48
1963	45.50	\$68,072.83	32.00	6.08	0.1711	1.0000	\$11,649.88	\$1,914.55
1962	46.50	\$10,263.94	32.00	5.73	0.1611	1.0000	\$1,553.64	\$288.67
1961	47.50	\$26,558.66	32.00	5.38	0.1513	1.0000	\$4,018.58	\$746.96
1957	51.50	\$16,036.55	32.00	4.06	0.1143	1.0000	\$1,832.46	\$451.03
		\$46,811,222.57	32.00	22.17	0.6236	1.0000	\$30,438,788.09	\$1,372,815.63

Depreciation Reserve Summary

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Account: KEPCo 101/6 364 - KY
 Scenario: KEPCO DISTRIBUTION 2008 NEW
 Version: 30 - R0.5
 Average Net Salvage Rate: -53.00%
 Future Net Salvage Rate: -53.00%

Broad Group Procedure

January 1, 2009

	Plant Amt	Depreciation Reserve		Net Plant	
		Amount	Ratio	Amount	Ratio
Recorded	\$147,624,353.34	\$54,369,431.79	0.3683	\$171,495,828.82	1.1617
Computed	\$147,624,353.34	\$63,690,123.30	0.4314	\$162,175,137.31	1.0986
Difference		(\$9,320,691.51)	-0.0631	\$9,320,691.51	0.0631

Generation Arrangement Report

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Account: KEPCo 101/6 364 - KY

Dispersion: 30.00 - R0.5

Average Net Salvage Rate: -53.00%

Future Net Salvage Rate: -53.00%

Broad Group Procedure

January 1, 2009

Vintage	Age	Surviving Plant	Avg Life	Remaining Life	Net Plant Ratio	Alloc Factor	Computed Net Plant	Accrual
2008	0.50	\$7,948,638.50	30.00	29.69	1.5142	1.0000	\$12,035,471.82	\$405,380.56
2007	1.50	\$8,178,275.50	30.00	29.07	1.4826	1.0000	\$12,125,043.33	\$417,092.05
2006	2.50	\$6,214,520.50	30.00	28.45	1.4512	1.0000	\$9,018,407.02	\$316,940.55
2005	3.50	\$4,777,960.50	30.00	27.84	1.4199	1.0000	\$6,784,207.07	\$243,675.99
2004	4.50	\$4,606,829.50	30.00	27.23	1.3888	1.0000	\$6,397,836.62	\$234,948.30
2003	5.50	\$3,549,389.50	30.00	26.62	1.3578	1.0000	\$4,819,286.21	\$181,018.86
2002	6.50	\$4,214,322.76	30.00	26.02	1.3269	1.0000	\$5,591,977.46	\$214,930.46
2001	7.50	\$6,347,451.74	30.00	25.41	1.2962	1.0000	\$8,227,288.19	\$323,720.04
2000	8.50	\$5,960,969.40	30.00	24.81	1.2655	1.0000	\$7,543,698.37	\$304,009.44
1999	9.50	\$7,337,691.68	30.00	24.22	1.2350	1.0000	\$9,061,882.40	\$374,222.28
1998	10.50	\$2,103,276.29	30.00	23.62	1.2046	1.0000	\$2,533,536.80	\$107,267.09
1997	11.50	\$1,990,086.30	30.00	23.02	1.1743	1.0000	\$2,336,891.67	\$101,494.40
1996	12.50	\$8,709,971.42	30.00	22.43	1.1441	1.0000	\$9,964,882.15	\$444,208.54
1995	13.50	\$4,879,680.34	30.00	21.84	1.1141	1.0000	\$5,436,424.72	\$248,863.70
1994	14.50	\$5,554,403.77	30.00	21.26	1.0843	1.0000	\$6,022,522.36	\$283,274.59
1993	15.50	\$4,433,015.64	30.00	20.68	1.0546	1.0000	\$4,675,246.54	\$226,083.80
1992	16.50	\$5,137,798.24	30.00	20.10	1.0253	1.0000	\$5,267,682.32	\$262,027.71
1991	17.50	\$4,948,782.95	30.00	19.53	0.9962	1.0000	\$4,929,741.95	\$252,387.93
1990	18.50	\$4,596,012.91	30.00	18.97	0.9673	1.0000	\$4,445,708.08	\$234,396.66
1989	19.50	\$4,119,769.79	30.00	18.41	0.9388	1.0000	\$3,867,461.14	\$210,108.26
1988	20.50	\$3,655,979.86	30.00	17.85	0.9105	1.0000	\$3,328,875.63	\$186,454.97
1987	21.50	\$3,931,934.83	30.00	17.31	0.8826	1.0000	\$3,470,372.18	\$200,528.68
1986	22.50	\$3,857,405.68	30.00	16.77	0.8551	1.0000	\$3,298,390.56	\$196,727.69
1985	23.50	\$3,428,640.60	30.00	16.23	0.8279	1.0000	\$2,838,596.59	\$174,860.67
1984	24.50	\$2,924,315.25	30.00	15.71	0.8011	1.0000	\$2,342,615.02	\$149,140.08
1983	25.50	\$2,916,999.66	30.00	15.19	0.7747	1.0000	\$2,259,755.63	\$148,766.98
1982	26.50	\$2,966,548.13	30.00	14.68	0.7487	1.0000	\$2,220,914.34	\$151,293.95
1981	27.50	\$3,565,280.57	30.00	14.18	0.7230	1.0000	\$2,577,692.64	\$181,829.31
1980	28.50	\$2,846,805.41	30.00	13.68	0.6978	1.0000	\$1,986,392.42	\$145,187.08
1979	29.50	\$2,214,986.51	30.00	13.19	0.6729	1.0000	\$1,490,524.02	\$112,964.31
1978	30.50	\$1,781,277.76	30.00	12.72	0.6485	1.0000	\$1,155,099.05	\$90,845.17
1977	31.50	\$1,607,770.43	30.00	12.24	0.6244	1.0000	\$1,003,898.84	\$81,996.29
1976	32.50	\$1,140,196.79	30.00	11.78	0.6007	1.0000	\$684,939.60	\$58,150.04

Generation Arrangement Report

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Account: KEPCo 101/6 364 - KY
 Dispersion: 30.00 - R0.5
 rage Net Salvage Rate: -53.00%
 Future Net Salvage Rate: -53.00%

Broad Group Procedure
 January 1, 2009

Vintage	Age	Surviving Plant	Avg Life	Remaining Life	Net Plant Ratio	Alloc Factor	Computed Net Plant	Accrual
1975	33.50	\$771,932.62	30.00	11.32	0.5774	1.0000	\$445,722.25	\$39,368.56
1974	34.50	\$707,911.81	30.00	10.87	0.5545	1.0000	\$392,515.97	\$36,103.50
1973	35.50	\$655,672.79	30.00	10.43	0.5319	1.0000	\$348,744.29	\$33,439.31
1972	36.50	\$514,005.20	30.00	9.99	0.5096	1.0000	\$261,960.72	\$26,214.27
1971	37.50	\$474,887.97	30.00	9.56	0.4877	1.0000	\$231,605.40	\$24,219.29
1970	38.50	\$305,274.71	30.00	9.14	0.4661	1.0000	\$142,286.01	\$15,569.01
1969	39.50	\$264,049.96	30.00	8.72	0.4448	1.0000	\$117,437.65	\$13,466.55
1968	40.50	\$247,476.31	30.00	8.31	0.4237	1.0000	\$104,852.48	\$12,621.29
1967	41.50	\$217,338.86	30.00	7.90	0.4028	1.0000	\$87,552.12	\$11,084.28
1966	42.50	\$170,344.16	30.00	7.49	0.3822	1.0000	\$65,112.35	\$8,687.55
1965	43.50	\$157,437.82	30.00	7.09	0.3618	1.0000	\$56,957.28	\$8,029.33
1964	44.50	\$117,868.73	30.00	6.70	0.3414	1.0000	\$40,245.92	\$6,011.31
1963	45.50	\$86,668.67	30.00	6.30	0.3213	1.0000	\$27,843.90	\$4,420.10
1962	46.50	\$71,360.55	30.00	5.90	0.3011	1.0000	\$21,484.77	\$3,639.39
1961	47.50	\$85,532.53	30.00	5.51	0.2809	1.0000	\$24,025.10	\$4,362.16
1960	48.50	\$53,640.97	30.00	5.11	0.2607	1.0000	\$13,983.01	\$2,735.69
1959	49.50	\$56,450.03	30.00	4.71	0.2403	1.0000	\$13,564.38	\$2,878.95
1958	50.50	\$54,512.51	30.00	4.31	0.2197	1.0000	\$11,975.71	\$2,760.14
1957	51.50	\$43,193.57	30.00	3.90	0.1989	1.0000	\$8,589.57	\$2,202.87
1956	52.50	\$31,916.96	30.00	3.48	0.1776	1.0000	\$5,667.59	\$1,627.76
1955	53.50	\$22,048.26	30.00	3.06	0.1558	1.0000	\$3,435.58	\$1,124.46
1954	54.50	\$17,267.85	30.00	2.62	0.1336	1.0000	\$2,306.93	\$880.66
1953	55.50	\$15,022.13	30.00	2.17	0.1107	1.0000	\$1,662.86	\$766.13
1952	56.50	\$12,718.05	30.00	1.71	0.0873	1.0000	\$1,109.96	\$648.62
1951	57.50	\$13,385.54	30.00	1.25	0.0637	1.0000	\$852.68	\$682.66
1950	58.50	\$9,446.57	30.00	0.79	0.0402	1.0000	\$380.10	\$481.78
1949	59.50	(\$0.50)	30.00	0.40	0.0203	1.0000	(\$0.01)	(\$0.03)
		\$147,624,353.34	30.00	21.54	1.0986	1.0000	\$162,175,137.31	\$7,528,842.02

Depreciation Reserve Summary

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Account: KEPCo 101/6 365 - KY
 Scenario: KEPCO DISTRIBUTION 2008 NEW
 Version: 30 - R0.5
 Average Net Salvage Rate: 25.00%
 Future Net Salvage Rate: 25.00%

Broad Group Procedure

January 1, 2009

	Plant Amt	Depreciation Reserve		Net Plant	
		Amount	Ratio	Amount	Ratio
Recorded	\$129,155,637.73	\$19,207,656.07	0.1487	\$77,659,072.23	0.6013
Computed	\$129,155,637.73	\$22,500,473.95	0.1742	\$74,366,254.35	0.5758
Difference		(\$3,292,817.88)	-0.0255	\$3,292,817.88	0.0255

Generation Arrangement Report

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Account: KEPCo 101/6 365 - KY
 Dispersion: 30.00 - R0.5
 Average Net Salvage Rate: 25.00%
 Future Net Salvage Rate: 25.00%
 Broad Group Procedure
 January 1, 2009

Vintage	Age	Surviving Plant	Avg Life	Remaining Life	Net Plant Ratio	Alloc Factor	Computed Net Plant	Accrual
2008	0.50	\$10,259,054.50	30.00	29.69	0.7422	1.0000	\$7,614,607.88	\$256,476.36
2007	1.50	\$14,071,576.37	30.00	29.07	0.7268	1.0000	\$10,226,667.77	\$351,789.41
2006	2.50	\$8,762,102.00	30.00	28.45	0.7114	1.0000	\$6,233,046.18	\$219,052.55
2005	3.50	\$6,191,319.58	30.00	27.84	0.6960	1.0000	\$4,309,328.43	\$154,782.99
2004	4.50	\$5,087,568.64	30.00	27.23	0.6808	1.0000	\$3,463,467.53	\$127,189.22
2003	5.50	\$3,803,459.60	30.00	26.62	0.6656	1.0000	\$2,531,498.64	\$95,086.49
2002	6.50	\$5,177,311.14	30.00	26.02	0.6504	1.0000	\$3,367,531.88	\$129,432.78
2001	7.50	\$4,687,307.16	30.00	25.41	0.6354	1.0000	\$2,978,177.30	\$117,182.68
2000	8.50	\$4,667,822.82	30.00	24.81	0.6204	1.0000	\$2,895,687.01	\$116,695.57
1999	9.50	\$5,871,996.04	30.00	24.22	0.6054	1.0000	\$3,554,794.91	\$146,799.90
1998	10.50	\$1,997,800.69	30.00	23.62	0.5905	1.0000	\$1,179,649.21	\$49,945.02
1997	11.50	\$6,711,047.26	30.00	23.02	0.5756	1.0000	\$3,863,018.61	\$167,776.18
1996	12.50	\$2,724,980.64	30.00	22.43	0.5608	1.0000	\$1,528,229.89	\$68,124.52
1995	13.50	\$4,731,745.49	30.00	21.84	0.5461	1.0000	\$2,584,123.20	\$118,293.64
1994	14.50	\$3,588,540.22	30.00	21.26	0.5315	1.0000	\$1,907,342.23	\$89,713.51
1993	15.50	\$2,250,460.70	30.00	20.68	0.5170	1.0000	\$1,163,446.78	\$56,261.52
1992	16.50	\$2,524,409.91	30.00	20.10	0.5026	1.0000	\$1,268,738.85	\$63,110.25
1991	17.50	\$2,754,145.38	30.00	19.53	0.4883	1.0000	\$1,344,876.71	\$68,853.63
1990	18.50	\$2,796,403.03	30.00	18.97	0.4742	1.0000	\$1,325,956.57	\$69,910.08
1989	19.50	\$2,599,035.88	30.00	18.41	0.4602	1.0000	\$1,196,010.85	\$64,975.90
1988	20.50	\$2,268,131.89	30.00	17.85	0.4463	1.0000	\$1,012,352.86	\$56,703.30
1987	21.50	\$2,576,292.24	30.00	17.31	0.4327	1.0000	\$1,114,640.20	\$64,407.31
1986	22.50	\$2,225,276.16	30.00	16.77	0.4192	1.0000	\$932,739.81	\$55,631.90
1985	23.50	\$1,686,809.05	30.00	16.23	0.4058	1.0000	\$684,569.38	\$42,170.23
1984	24.50	\$1,496,442.83	30.00	15.71	0.3927	1.0000	\$587,633.70	\$37,411.07
1983	25.50	\$1,561,018.96	30.00	15.19	0.3797	1.0000	\$592,793.06	\$39,025.47
1982	26.50	\$1,689,657.01	30.00	14.68	0.3670	1.0000	\$620,081.53	\$42,241.43
1981	27.50	\$2,531,097.95	30.00	14.18	0.3544	1.0000	\$897,049.08	\$63,277.45
1980	28.50	\$1,972,796.40	30.00	13.68	0.3420	1.0000	\$674,775.59	\$49,319.91
1979	29.50	\$1,692,005.70	30.00	13.19	0.3299	1.0000	\$558,135.37	\$42,300.14
1978	30.50	\$1,389,006.54	30.00	12.72	0.3179	1.0000	\$441,531.51	\$34,725.16
1977	31.50	\$1,530,748.77	30.00	12.24	0.3061	1.0000	\$468,532.44	\$38,268.72
1976	32.50	\$830,267.04	30.00	11.78	0.2945	1.0000	\$244,489.43	\$20,756.68

Generation Arrangement Report

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Account: KEPCo 101/6 365 - KY
 Dispersion: 30.00 - R0.5
 Average Net Salvage Rate: 25.00%
 Future Net Salvage Rate: 25.00%
 Broad Group Procedure
 January 1, 2009

Vintage	Age	Surviving Plant	Avg Life	Remaining Life	Net Plant Ratio	Alloc Factor	Computed Net Plant	Accrual
1975	33.50	\$456,119.13	30.00	11.32	0.2830	1.0000	\$129,102.02	\$11,402.98
1974	34.50	\$460,352.53	30.00	10.87	0.2718	1.0000	\$125,123.40	\$11,508.81
1973	35.50	\$444,878.85	30.00	10.43	0.2607	1.0000	\$115,992.94	\$11,121.97
1972	36.50	\$437,583.31	30.00	9.99	0.2498	1.0000	\$109,319.90	\$10,939.58
1971	37.50	\$519,839.04	30.00	9.55	0.2391	1.0000	\$124,278.57	\$12,995.98
1970	38.50	\$387,456.46	30.00	9.14	0.2285	1.0000	\$88,524.63	\$9,686.41
1969	39.50	\$313,176.03	30.00	8.72	0.2180	1.0000	\$68,277.81	\$7,829.40
1968	40.50	\$279,678.01	30.00	8.31	0.2077	1.0000	\$58,086.24	\$6,891.95
1967	41.50	\$238,035.00	30.00	7.90	0.1975	1.0000	\$47,004.55	\$5,950.88
1966	42.50	\$184,500.08	30.00	7.49	0.1874	1.0000	\$34,570.25	\$4,612.50
1965	43.50	\$160,667.82	30.00	7.09	0.1773	1.0000	\$28,493.05	\$4,016.70
1964	44.50	\$106,984.89	30.00	6.70	0.1674	1.0000	\$17,906.70	\$2,674.62
1963	45.50	\$66,759.95	30.00	6.30	0.1575	1.0000	\$10,513.66	\$1,669.00
1962	46.50	\$62,989.54	30.00	5.90	0.1476	1.0000	\$9,296.32	\$1,574.74
1961	47.50	\$68,508.10	30.00	5.51	0.1377	1.0000	\$9,432.91	\$1,712.70
1960	48.50	\$43,880.79	30.00	5.11	0.1278	1.0000	\$5,607.23	\$1,097.02
1959	49.50	\$41,745.87	30.00	4.71	0.1178	1.0000	\$4,917.22	\$1,043.65
1958	50.50	\$45,221.82	30.00	4.31	0.1077	1.0000	\$4,869.93	\$1,130.55
1957	51.50	\$35,262.38	30.00	3.90	0.0975	1.0000	\$3,437.43	\$881.56
1956	52.50	\$27,220.81	30.00	3.48	0.0870	1.0000	\$2,369.45	\$680.52
1955	53.50	\$16,872.07	30.00	3.06	0.0764	1.0000	\$1,288.73	\$421.80
1954	54.50	\$13,254.67	30.00	2.62	0.0655	1.0000	\$868.03	\$331.37
1953	55.50	\$11,275.41	30.00	2.17	0.0543	1.0000	\$611.82	\$281.89
1952	56.50	\$9,735.21	30.00	1.71	0.0428	1.0000	\$416.49	\$243.38
1951	57.50	\$9,134.25	30.00	1.25	0.0312	1.0000	\$285.23	\$228.36
1950	58.50	\$6,868.62	30.00	0.79	0.0197	1.0000	\$135.48	\$171.72
1949	59.50	(\$0.50)	30.00	0.40	0.0100	1.0000	\$0.00	(\$0.01)
		\$129,155,637.73	30.00	23.03	0.5758	1.0000	\$74,366,254.35	\$3,228,890.94

Depreciation Reserve Summary

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Account: KEPCo 101/5 366 - KY
 Scenario: KEPCO DISTRIBUTION 2008 NEW
 Version: 50 - R0.5
 Average Net Salvage Rate: 0.00%
 Future Net Salvage Rate: 0.00%

Broad Group Procedure

January 1, 2009

	Plant Amt	Depreciation Reserve		Net Plant	
		Amount	Ratio	Amount	Ratio
Recorded	\$4,302,754.53	\$504,000.00	0.1171	\$3,798,754.53	0.8829
Computed	\$4,302,754.53	\$590,402.02	0.1372	\$3,712,352.51	0.8628
Difference		(\$86,402.02)	-0.0201	\$86,402.02	0.0201

Generation Arrangement Report

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Account: KEPCo 101/6 366 - KY

Dispersion: 50.00 - R0.5

Age Net Salvage Rate: 0.00%

Future Net Salvage Rate: 0.00%

Broad Group Procedure

January 1, 2009

Vintage	Age	Surviving Plant	Avg Life	Remaining Life	Net Plant Ratio	Alloc Factor	Computed Net Plant	Accrual
2008	0.50	\$332,819.50	50.00	49.69	0.9938	1.0000	\$330,751.16	\$6,656.39
2007	1.50	\$312,381.50	50.00	49.07	0.9814	1.0000	\$306,567.59	\$6,247.63
2006	2.50	\$509,176.50	50.00	48.45	0.9690	1.0000	\$493,399.15	\$10,183.53
2005	3.50	\$199,943.50	50.00	47.83	0.9567	1.0000	\$191,284.23	\$3,998.87
2004	4.50	\$173,356.50	50.00	47.22	0.9444	1.0000	\$163,716.26	\$3,467.13
2003	5.50	\$118,994.50	50.00	46.61	0.9321	1.0000	\$110,917.28	\$2,379.89
2002	6.50	\$134,439.50	50.00	45.99	0.9199	1.0000	\$123,669.81	\$2,688.79
2001	7.50	\$123,659.50	50.00	45.38	0.9077	1.0000	\$112,244.88	\$2,473.19
2000	8.50	\$182,080.50	50.00	44.78	0.8955	1.0000	\$163,059.28	\$3,641.61
1999	9.50	\$137,692.50	50.00	44.17	0.8834	1.0000	\$121,636.84	\$2,753.85
1998	10.50	\$60,158.50	50.00	43.56	0.8713	1.0000	\$52,615.17	\$1,203.17
1997	11.50	\$291,323.50	50.00	42.96	0.8592	1.0000	\$250,308.75	\$5,826.47
1996	12.50	\$131,833.50	50.00	42.36	0.8472	1.0000	\$111,683.91	\$2,636.67
1995	13.50	\$133,289.50	50.00	41.76	0.8351	1.0000	\$111,314.44	\$2,665.79
1994	14.50	\$118,922.50	50.00	41.16	0.8231	1.0000	\$97,889.16	\$2,378.46
1993	15.50	\$270,669.50	50.00	40.56	0.8112	1.0000	\$219,556.75	\$5,413.39
1992	16.50	\$131,413.50	50.00	39.96	0.7992	1.0000	\$105,027.73	\$2,628.27
1991	17.50	\$51,674.59	50.00	39.36	0.7873	1.0000	\$40,683.15	\$1,033.49
1990	18.50	\$203,684.51	50.00	38.77	0.7754	1.0000	\$157,936.92	\$4,073.69
1989	19.50	\$47,694.17	50.00	38.18	0.7635	1.0000	\$36,416.32	\$953.88
1988	20.50	\$24,133.84	50.00	37.59	0.7517	1.0000	\$18,141.43	\$482.68
1987	21.50	\$9,203.37	50.00	37.00	0.7399	1.0000	\$6,809.71	\$184.07
1986	22.50	\$33,613.44	50.00	36.41	0.7282	1.0000	\$24,476.00	\$672.27
1985	23.50	\$70,256.51	50.00	35.82	0.7164	1.0000	\$50,335.21	\$1,405.13
1984	24.50	\$4,236.37	50.00	35.24	0.7048	1.0000	\$2,985.74	\$84.73
1983	25.50	\$36,207.20	50.00	34.66	0.6932	1.0000	\$25,097.61	\$724.14
1982	26.50	\$43,688.68	50.00	34.08	0.6816	1.0000	\$29,778.78	\$873.77
1981	27.50	\$70,212.75	50.00	33.51	0.6701	1.0000	\$47,050.27	\$1,404.26
1980	28.50	\$40,343.58	50.00	32.93	0.6587	1.0000	\$26,572.94	\$806.87
1979	29.50	\$7,082.14	50.00	32.36	0.6473	1.0000	\$4,584.13	\$141.64
1978	30.50	\$23,996.61	50.00	31.80	0.6360	1.0000	\$15,260.98	\$479.93
1977	31.50	\$31,336.24	50.00	31.24	0.6247	1.0000	\$19,576.52	\$626.72
1976	32.50	\$42,429.68	50.00	30.68	0.6136	1.0000	\$26,032.94	\$848.59

Generation Arrangement Report

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Account: KEPCo 101/6 366 - KY
 Dispersion: 50.00 - R0.5
 Average Net Salvage Rate: 0.00%
 Future Net Salvage Rate: 0.00%

Broad Group Procedure
 January 1, 2009

Vintage	Age	Surviving Plant	Avg Life	Remaining Life	Net Plant Ratio	Alloc Factor	Computed Net Plant	Accrual
1975	33.50	\$25,596.90	50.00	30.12	0.6025	1.0000	\$15,420.99	\$511.94
1974	34.50	\$43,167.39	50.00	29.57	0.5914	1.0000	\$25,530.74	\$863.35
1973	35.50	\$47,793.41	50.00	29.02	0.5805	1.0000	\$27,743.94	\$955.87
1972	36.50	\$21,698.35	50.00	28.48	0.5696	1.0000	\$12,360.08	\$433.97
1971	37.50	\$28,424.14	50.00	27.94	0.5589	1.0000	\$15,885.11	\$568.48
1970	38.50	\$23,036.43	50.00	27.41	0.5482	1.0000	\$12,627.95	\$460.73
1969	39.50	\$2,324.70	50.00	26.88	0.5376	1.0000	\$1,249.70	\$46.49
1968	40.50	\$597.47	50.00	26.35	0.5271	1.0000	\$314.90	\$11.95
1967	41.50	\$4,686.19	50.00	25.83	0.5166	1.0000	\$2,421.07	\$93.72
1966	42.50	\$2,912.71	50.00	25.32	0.5063	1.0000	\$1,474.73	\$58.25
1947	61.50	\$23.97	50.00	16.36	0.3273	1.0000	\$7.84	\$0.48
1942	66.50	\$51.31	50.00	14.25	0.2851	1.0000	\$14.63	\$1.03
1940	68.50	\$25.42	50.00	13.43	0.2687	1.0000	\$6.83	\$0.51
1939	69.50	\$97.89	50.00	13.03	0.2605	1.0000	\$25.50	\$1.96
1936	72.50	\$370.07	50.00	11.82	0.2364	1.0000	\$87.47	\$7.40
		\$4,302,754.53	50.00	43.14	0.8628	1.0000	\$3,712,352.51	\$86,055.09

Depreciation Reserve Summary

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Account: KEPCo 101/6 367 - KY
 Scenario: KEPCO DISTRIBUTION 2008 NEW
 Version: 50 - S-5
 Average Net Salvage Rate: 0.00%
 Future Net Salvage Rate: 0.00%

Broad Group Procedure

January 1, 2009

	Plant Amt	Depreciation Reserve		Net Plant	
		Amount	Ratio	Amount	Ratio
Recorded	\$7,652,121.53	\$898,240.40	0.1174	\$6,753,881.13	0.8826
Computed	\$7,652,121.53	\$1,052,228.06	0.1375	\$6,599,893.47	0.8625
Difference		(\$153,987.66)	-0.0201	\$153,987.66	0.0201

Generation Arrangement Report

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Account: KEPCo 101/6 367 - KY

Dispersion: 50.00 - S-5

Age Net Salvage Rate: 0.00%

Future Net Salvage Rate: 0.00%

Broad Group Procedure

January 1, 2009

Vintage	Age	Surviving Plant	Avg Life	Remaining Life	Net Plant Ratio	Alloc Factor	Computed Net Plant	Accrual
2008	0.50	\$576,157.36	50.00	49.63	0.9926	1.0000	\$571,895.95	\$11,523.15
2007	1.50	\$963,461.43	50.00	48.91	0.9782	1.0000	\$942,421.21	\$19,269.23
2006	2.50	\$772,219.97	50.00	48.20	0.9641	1.0000	\$744,485.11	\$16,444.40
2005	3.50	\$101,668.54	50.00	47.52	0.9503	1.0000	\$96,616.56	\$2,033.37
2004	4.50	\$788,048.30	50.00	46.84	0.9368	1.0000	\$738,240.67	\$15,760.97
2003	5.50	\$237,053.79	50.00	46.18	0.9235	1.0000	\$218,922.63	\$4,741.08
2002	6.50	\$144,120.80	50.00	45.52	0.9105	1.0000	\$131,215.34	\$2,882.42
2001	7.50	\$278,536.52	50.00	44.88	0.8976	1.0000	\$250,012.81	\$5,570.73
2000	8.50	\$244,297.40	50.00	44.25	0.8849	1.0000	\$216,185.21	\$4,885.95
1999	9.50	\$352,262.20	50.00	43.62	0.8724	1.0000	\$307,321.11	\$7,045.24
1998	10.50	\$136,018.40	50.00	43.00	0.8601	1.0000	\$116,986.68	\$2,720.37
1997	11.50	\$311,603.14	50.00	42.40	0.8479	1.0000	\$264,208.81	\$6,232.06
1996	12.50	\$173,317.73	50.00	41.79	0.8359	1.0000	\$144,870.90	\$3,466.35
1995	13.50	\$188,669.84	50.00	41.20	0.8240	1.0000	\$155,458.86	\$3,773.40
1994	14.50	\$158,181.27	50.00	40.61	0.8122	1.0000	\$128,475.70	\$3,163.63
1993	15.50	\$251,310.07	50.00	40.03	0.8006	1.0000	\$201,190.58	\$5,026.20
1992	16.50	\$135,449.86	50.00	39.45	0.7890	1.0000	\$106,876.67	\$2,709.00
1991	17.50	\$121,820.67	50.00	38.88	0.7776	1.0000	\$94,733.27	\$2,436.41
1990	18.50	\$312,895.12	50.00	38.32	0.7663	1.0000	\$239,785.88	\$6,257.90
1989	19.50	\$98,828.16	50.00	37.76	0.7552	1.0000	\$74,631.23	\$1,976.56
1988	20.50	\$65,076.14	50.00	37.20	0.7441	1.0000	\$48,421.00	\$1,301.52
1987	21.50	\$89,560.82	50.00	36.65	0.7331	1.0000	\$65,655.34	\$1,791.22
1986	22.50	\$64,647.82	50.00	36.11	0.7222	1.0000	\$46,687.27	\$1,292.96
1985	23.50	\$96,154.90	50.00	35.57	0.7114	1.0000	\$68,401.68	\$1,923.10
1984	24.50	\$17,052.19	50.00	35.03	0.7006	1.0000	\$11,947.57	\$341.04
1983	25.50	\$78,839.64	50.00	34.50	0.6900	1.0000	\$54,400.35	\$1,576.79
1982	26.50	\$202,595.28	50.00	33.97	0.6795	1.0000	\$137,653.39	\$4,051.91
1981	27.50	\$85,403.61	50.00	33.45	0.6690	1.0000	\$57,132.44	\$1,708.07
1980	28.50	\$64,662.27	50.00	32.93	0.6586	1.0000	\$42,584.30	\$1,293.25
1979	29.50	\$33,493.19	50.00	32.41	0.6482	1.0000	\$21,711.22	\$669.86
1978	30.50	\$60,488.02	50.00	31.90	0.6380	1.0000	\$38,589.00	\$1,209.76
1977	31.50	\$37,823.50	50.00	31.39	0.6278	1.0000	\$23,744.31	\$756.47
1976	32.50	\$47,337.17	50.00	30.88	0.6176	1.0000	\$29,236.71	\$946.74

Generation Arrangement Report

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Account: KEPCo 101/6 367 - KY
 Dispersion: 50.00 - S-5
 Original Net Salvage Rate: 0.00%
 Future Net Salvage Rate: 0.00%

Broad Group Procedure
 January 1, 2009

Vintage	Age	Surviving Plant	Avg Life	Remaining Life	Net Plant Ratio	Alloc Factor	Computed Net Plant	Accrual
1975	33.50	\$16,527.54	50.00	30.38	0.6076	1.0000	\$10,041.53	\$330.55
1974	34.50	\$51,811.79	50.00	29.88	0.5976	1.0000	\$30,960.21	\$1,036.24
1973	35.50	\$92,372.24	50.00	29.38	0.5876	1.0000	\$54,277.21	\$1,847.44
1972	36.50	\$72,106.16	50.00	28.88	0.5777	1.0000	\$41,655.50	\$1,442.12
1971	37.50	\$55,858.89	50.00	28.39	0.5679	1.0000	\$31,719.96	\$1,117.18
1970	38.50	\$48,559.20	50.00	27.90	0.5581	1.0000	\$27,099.49	\$971.18
1969	39.50	\$7,336.22	50.00	27.42	0.5483	1.0000	\$4,022.71	\$146.72
1968	40.50	\$3,042.39	50.00	26.93	0.5386	1.0000	\$1,638.77	\$60.85
1967	41.50	\$9,157.48	50.00	26.45	0.5290	1.0000	\$4,844.36	\$183.15
1966	42.50	\$2,790.87	50.00	25.97	0.5194	1.0000	\$1,449.62	\$55.82
1965	43.50	\$1,211.59	50.00	25.49	0.5099	1.0000	\$617.75	\$24.23
1963	45.50	\$905.19	50.00	24.55	0.4909	1.0000	\$444.36	\$18.10
1957	51.50	\$228.34	50.00	21.75	0.4349	1.0000	\$99.32	\$4.57
1947	61.50	\$197.28	50.00	17.21	0.3442	1.0000	\$67.90	\$3.95
1942	66.50	\$93.76	50.00	14.98	0.2997	1.0000	\$28.10	\$1.88
1940	68.50	\$56.35	50.00	14.10	0.2820	1.0000	\$15.89	\$1.13
1939	69.50	\$410.72	50.00	13.66	0.2732	1.0000	\$112.21	\$8.21
1936	72.50	\$400.40	50.00	12.34	0.2468	1.0000	\$98.82	\$8.01
		\$7,652,121.53	50.00	43.12	0.8625	1.0000	\$6,599,893.47	\$153,042.43

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Depreciation Reserve Summary

Account: KEPCo 101/6 368 - KY
 Scenario: KEPCO DISTRIBUTION 2008 NEW
 Depreciation: 30 - R0.5
 Average Net Salvage Rate: 25.00%
 Future Net Salvage Rate: 25.00%

Broad Group Procedure

January 1, 2009

	Plant Amt	Depreciation Reserve		Net Plant	
		Amount	Ratio	Amount	Ratio
Recorded	\$98,415,054.43	\$17,662,832.57	0.1795	\$56,148,458.25	0.5705
Computed	\$98,415,054.43	\$20,690,817.38	0.2102	\$53,120,473.44	0.5398
Difference		(\$3,027,984.81)	-0.0308	\$3,027,984.81	0.0308

Generation Arrangement Report

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Account: KEPCo 101/6 368 - KY
 Dispersion: 30.00 - R0.5

Age Net Salvage Rate: 25.00%
 Future Net Salvage Rate: 25.00%

Broad Group Procedure
 January 1, 2009

Vintage	Age	Surviving Plant	Avg Life	Remaining Life	Net Plant Ratio	Alloc Factor	Computed Net Plant	Accrual
2008	0.50	\$7,450,618.50	30.00	29.69	0.7422	1.0000	\$5,530,094.25	\$186,265.46
2007	1.50	\$7,254,032.50	30.00	29.07	0.7268	1.0000	\$5,271,945.26	\$181,350.81
2006	2.50	\$4,610,530.84	30.00	28.45	0.7114	1.0000	\$3,279,766.84	\$115,263.27
2005	3.50	\$2,427,727.71	30.00	27.84	0.6960	1.0000	\$1,689,765.15	\$60,693.19
2004	4.50	\$2,508,317.48	30.00	27.23	0.6808	1.0000	\$1,707,588.98	\$62,707.94
2003	5.50	\$1,277,326.30	30.00	26.62	0.6656	1.0000	\$850,160.15	\$31,933.16
2002	6.50	\$3,510,019.56	30.00	26.02	0.6504	1.0000	\$2,283,058.23	\$87,750.49
2001	7.50	\$2,203,297.46	30.00	25.41	0.6354	1.0000	\$1,399,910.49	\$55,082.44
2000	8.50	\$3,095,724.60	30.00	24.81	0.6204	1.0000	\$1,920,434.83	\$77,393.11
1999	9.50	\$3,969,541.13	30.00	24.22	0.6054	1.0000	\$2,403,084.83	\$99,238.53
1998	10.50	\$3,049,131.24	30.00	23.62	0.5905	1.0000	\$1,800,432.48	\$76,228.28
1997	11.50	\$4,110,249.12	30.00	23.02	0.5756	1.0000	\$2,365,945.02	\$102,756.23
1996	12.50	\$2,778,395.23	30.00	22.43	0.5608	1.0000	\$1,558,185.99	\$69,459.88
1995	13.50	\$3,482,517.21	30.00	21.84	0.5461	1.0000	\$1,901,888.75	\$87,062.93
1994	14.50	\$4,458,288.16	30.00	21.26	0.5315	1.0000	\$2,369,621.28	\$111,457.20
1993	15.50	\$3,404,200.20	30.00	20.68	0.5170	1.0000	\$1,759,908.87	\$85,105.01
1992	16.50	\$2,507,427.51	30.00	20.10	0.5026	1.0000	\$1,260,203.70	\$62,685.69
1991	17.50	\$2,933,382.55	30.00	19.53	0.4883	1.0000	\$1,432,400.01	\$73,334.56
1990	18.50	\$2,916,488.91	30.00	18.97	0.4742	1.0000	\$1,382,897.09	\$72,912.22
1989	19.50	\$2,756,932.53	30.00	18.41	0.4602	1.0000	\$1,268,670.91	\$68,923.31
1988	20.50	\$1,650,611.63	30.00	17.85	0.4463	1.0000	\$736,730.26	\$41,265.29
1987	21.50	\$2,192,627.67	30.00	17.31	0.4327	1.0000	\$948,646.62	\$64,815.69
1986	22.50	\$2,469,175.06	30.00	16.77	0.4192	1.0000	\$1,034,971.71	\$61,729.38
1985	23.50	\$1,911,956.23	30.00	16.23	0.4058	1.0000	\$775,942.42	\$47,798.91
1984	24.50	\$2,079,109.79	30.00	15.71	0.3927	1.0000	\$816,439.47	\$51,977.74
1983	25.50	\$1,563,748.17	30.00	15.19	0.3797	1.0000	\$593,829.47	\$39,093.70
1982	26.50	\$1,319,593.78	30.00	14.68	0.3670	1.0000	\$484,273.27	\$32,989.84
1981	27.50	\$1,727,030.12	30.00	14.18	0.3544	1.0000	\$612,078.55	\$43,175.75
1980	28.50	\$2,026,221.05	30.00	13.68	0.3420	1.0000	\$693,048.97	\$50,655.53
1979	29.50	\$1,529,489.65	30.00	13.19	0.3299	1.0000	\$504,526.83	\$38,237.24
1978	30.50	\$1,984,197.33	30.00	12.72	0.3179	1.0000	\$630,728.24	\$49,604.93
1977	31.50	\$1,748,736.42	30.00	12.24	0.3061	1.0000	\$535,254.23	\$43,718.41
1976	32.50	\$808,490.71	30.00	11.78	0.2945	1.0000	\$238,076.94	\$20,212.27

Generation Arrangement Report

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Account: KEPCo 101/6 368 -KY

Dispersion: 30.00 - R0.5

Large Net Salvage Rate: 25.00%

Future Net Salvage Rate: 25.00%

Broad Group Procedure

January 1, 2009

Vintage	Age	Surviving Plant	Avg Life	Remaining Life	Net Plant Ratio	Alloc Factor	Computed Net Plant	Accrual
1975	33.50	\$725,580.37	30.00	11.32	0.2830	1.0000	\$205,371.55	\$18,139.51
1974	34.50	\$631,874.00	30.00	10.87	0.2718	1.0000	\$171,742.78	\$15,796.85
1973	35.50	\$570,838.98	30.00	10.43	0.2607	1.0000	\$148,834.43	\$14,270.97
1972	36.50	\$419,577.46	30.00	9.99	0.2498	1.0000	\$104,821.57	\$10,489.44
1971	37.50	\$409,792.00	30.00	9.56	0.2391	1.0000	\$97,969.48	\$10,244.80
1970	38.50	\$325,965.50	30.00	9.14	0.2285	1.0000	\$74,475.40	\$8,149.14
1969	39.50	\$202,860.35	30.00	8.72	0.2180	1.0000	\$44,227.08	\$5,071.51
1968	40.50	\$297,152.00	30.00	8.31	0.2077	1.0000	\$61,715.41	\$7,428.80
1967	41.50	\$228,659.98	30.00	7.90	0.1975	1.0000	\$45,153.28	\$5,716.50
1966	42.50	\$179,634.16	30.00	7.49	0.1874	1.0000	\$33,658.51	\$4,490.85
1965	43.50	\$112,213.01	30.00	7.09	0.1773	1.0000	\$19,900.01	\$2,805.33
1964	44.50	\$81,633.10	30.00	6.70	0.1674	1.0000	\$13,663.42	\$2,040.83
1963	45.50	\$62,860.75	30.00	6.30	0.1575	1.0000	\$9,899.59	\$1,571.52
1962	46.50	\$52,065.94	30.00	5.90	0.1476	1.0000	\$7,684.16	\$1,301.65
1961	47.50	\$62,247.50	30.00	5.51	0.1377	1.0000	\$8,570.88	\$1,556.19
1960	48.50	\$54,234.76	30.00	5.11	0.1278	1.0000	\$6,930.29	\$1,355.87
1959	49.50	\$58,960.27	30.00	4.71	0.1178	1.0000	\$6,944.89	\$1,474.01
1958	50.50	\$54,973.04	30.00	4.31	0.1077	1.0000	\$5,920.04	\$1,374.33
1957	51.50	\$27,425.68	30.00	3.90	0.0975	1.0000	\$2,673.50	\$685.64
1956	52.50	\$57,168.75	30.00	3.48	0.0870	1.0000	\$4,976.29	\$1,429.22
1955	53.50	\$30,271.32	30.00	3.06	0.0764	1.0000	\$2,312.21	\$756.78
1954	54.50	\$15,035.19	30.00	2.62	0.0655	1.0000	\$984.63	\$375.88
1953	55.50	\$13,246.72	30.00	2.17	0.0543	1.0000	\$718.79	\$331.17
1952	56.50	\$7,547.55	30.00	1.71	0.0428	1.0000	\$322.90	\$188.69
1951	57.50	\$11,761.92	30.00	1.25	0.0312	1.0000	\$367.28	\$294.05
1950	58.50	\$6,338.28	30.00	0.79	0.0197	1.0000	\$125.02	\$158.46
1949	59.50	(\$0.50)	30.00	0.40	0.0100	1.0000	\$0.00	(\$0.01)
		\$98,415,064.43	30.00	21.59	0.5398	1.0000	\$53,120,473.44	\$2,460,376.36

Depreciation Reserve Summary

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Account: KEPCo 101/6 369 - KY
 Scenario: KEPCO DISTRIBUTION 2008 NEW
 Version: 25 - L0

Average Net Salvage Rate: -15.00%
 Future Net Salvage Rate: -15.00%

Broad Group Procedure

January 1, 2009

	Plant Amt	Depreciation Reserve		Net Plant	
		Amount	Ratio	Amount	Ratio
Recorded	\$38,162,243.26	\$7,829,242.37	0.2052	\$36,057,337.38	0.9448
Computed	\$38,162,243.26	\$9,171,429.52	0.2403	\$34,715,150.23	0.9097
Difference		(\$1,342,187.15)	-0.0352	\$1,342,187.15	0.0352

Generation Arrangement Report

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Account: KEPCo 101/6 369 - KY
 Dispersion: 25.00 - L0
 Average Net Salvage Rate: -15.00%
 Future Net Salvage Rate: -15.00%

Broad Group Procedure
 January 1, 2009

Vintage	Age	Surviving Plant	Avg Life	Remaining Life	Net Plant Ratio	Alloc Factor	Computed Net Plant	Accrual
2008	0.50	\$2,815,091.50	25.00	24.58	1.1306	1.0000	\$3,182,767.97	\$129,494.21
2007	1.50	\$2,552,906.50	25.00	23.85	1.0971	1.0000	\$2,800,688.20	\$117,433.70
2006	2.50	\$2,696,436.50	25.00	23.20	1.0673	1.0000	\$2,877,985.23	\$124,036.08
2005	3.50	\$2,369,258.87	25.00	22.61	1.0402	1.0000	\$2,464,436.43	\$108,985.91
2004	4.50	\$1,992,575.74	25.00	22.06	1.0150	1.0000	\$2,022,421.61	\$91,658.48
2003	5.50	\$2,565,195.95	25.00	21.55	0.9914	1.0000	\$2,543,020.91	\$117,999.01
2002	6.50	\$1,783,173.59	25.00	21.07	0.9690	1.0000	\$1,727,959.30	\$82,025.99
2001	7.50	\$1,759,260.78	25.00	20.61	0.9478	1.0000	\$1,667,504.12	\$80,926.00
2000	8.50	\$2,375,528.82	25.00	20.17	0.9276	1.0000	\$2,203,518.57	\$109,274.33
1999	9.50	\$2,160,083.28	25.00	19.74	0.9082	1.0000	\$1,961,732.84	\$99,363.03
1998	10.50	\$664,737.97	25.00	19.34	0.8894	1.0000	\$591,247.59	\$30,577.95
1997	11.50	\$2,134,024.70	25.00	18.94	0.8713	1.0000	\$1,859,397.29	\$98,165.14
1996	12.50	\$639,388.86	25.00	18.56	0.8536	1.0000	\$545,800.24	\$29,411.89
1995	13.50	\$838,668.32	25.00	18.18	0.8363	1.0000	\$701,399.41	\$38,578.74
1994	14.50	\$988,801.38	25.00	17.81	0.8194	1.0000	\$810,205.81	\$45,484.86
1993	15.50	\$1,169,310.03	25.00	17.45	0.8028	1.0000	\$938,694.83	\$53,788.26
1992	16.50	\$792,671.10	25.00	17.10	0.7865	1.0000	\$623,445.23	\$36,462.87
1991	17.50	\$807,635.15	25.00	16.75	0.7706	1.0000	\$622,335.12	\$37,151.22
1990	18.50	\$593,763.61	25.00	16.41	0.7549	1.0000	\$448,261.06	\$27,313.13
1989	19.50	\$712,408.59	25.00	16.08	0.7396	1.0000	\$526,925.84	\$32,770.80
1988	20.50	\$513,065.46	25.00	15.75	0.7246	1.0000	\$371,779.77	\$23,601.01
1987	21.50	\$514,827.20	25.00	15.43	0.7099	1.0000	\$365,482.85	\$23,682.05
1986	22.50	\$387,672.00	25.00	15.12	0.6955	1.0000	\$269,622.81	\$17,832.91
1985	23.50	\$359,490.06	25.00	14.81	0.6813	1.0000	\$244,935.37	\$16,536.54
1984	24.50	\$388,477.47	25.00	14.51	0.6675	1.0000	\$259,296.33	\$17,869.96
1983	25.50	\$444,198.84	25.00	14.21	0.6539	1.0000	\$290,446.22	\$20,433.15
1982	26.50	\$311,944.04	25.00	13.92	0.6405	1.0000	\$199,807.12	\$14,349.43
1981	27.50	\$359,215.25	25.00	13.64	0.6274	1.0000	\$225,380.70	\$16,523.90
1980	28.50	\$338,925.99	25.00	13.36	0.6146	1.0000	\$208,294.62	\$15,590.60
1979	29.50	\$264,050.48	25.00	13.09	0.6020	1.0000	\$158,948.07	\$12,146.32
1978	30.50	\$291,145.81	25.00	12.82	0.5896	1.0000	\$171,654.87	\$13,392.71
1977	31.50	\$239,426.52	25.00	12.55	0.5774	1.0000	\$138,252.36	\$11,013.62
1976	32.50	\$186,149.86	25.00	12.29	0.5655	1.0000	\$105,266.52	\$8,562.89

Generation Arrangement Report

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Account: KEPCo 101/6 369 - KY
 Dispersion: 25.00 - L0
 Average Net Salvage Rate: -15.00%
 Future Net Salvage Rate: -15.00%
 Broad Group Procedure
 January 1, 2009

Vintage	Age	Surviving Plant	Avg Life	Remaining Life	Net Plant Ratio	Alloc Factor	Computed Net Plant	Accrual
1975	33.50	\$153,780.09	25.00	12.04	0.5538	1.0000	\$85,159.36	\$7,073.88
1974	34.50	\$133,145.41	25.00	11.79	0.5423	1.0000	\$72,200.36	\$6,124.69
1973	35.50	\$169,001.86	25.00	11.54	0.5309	1.0000	\$89,729.49	\$7,774.09
1972	36.50	\$165,063.63	25.00	11.30	0.5198	1.0000	\$85,806.43	\$7,592.93
1971	37.50	\$114,971.88	25.00	11.06	0.5089	1.0000	\$58,510.28	\$5,288.71
1970	38.50	\$89,073.79	25.00	10.83	0.4982	1.0000	\$44,374.20	\$4,097.39
1969	39.50	\$73,189.03	25.00	10.60	0.4876	1.0000	\$35,689.08	\$3,366.70
1968	40.50	\$59,708.72	25.00	10.37	0.4772	1.0000	\$28,495.45	\$2,746.60
1967	41.50	\$50,405.15	25.00	10.15	0.4671	1.0000	\$23,541.75	\$2,318.64
1966	42.50	\$36,124.49	25.00	9.94	0.4570	1.0000	\$16,509.31	\$1,661.73
1965	43.50	\$26,810.45	25.00	9.72	0.4471	1.0000	\$11,987.62	\$1,233.28
1964	44.50	\$21,374.50	25.00	9.51	0.4374	1.0000	\$9,349.74	\$983.23
1963	45.50	\$15,337.03	25.00	9.30	0.4278	1.0000	\$6,561.77	\$705.60
1962	46.50	\$14,414.05	25.00	9.10	0.4184	1.0000	\$6,031.15	\$663.05
1961	47.50	\$17,052.67	25.00	8.89	0.4092	1.0000	\$6,977.36	\$784.42
1960	48.50	\$13,280.79	25.00	8.70	0.4000	1.0000	\$5,312.84	\$610.92
1959	49.50	(\$0.50)	25.00	8.50	0.3911	1.0000	(\$0.20)	(\$0.02)
		\$38,162,243.26	25.00	19.78	0.9097	1.0000	\$34,715,150.23	\$1,755,463.19

Depreciation Reserve Summary

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Account: KEPCo 101/6 370 - KY
 Scenario: KEPCO DISTRIBUTION 2008 NEW
 Version: 17 - S6
 Average Net Salvage Rate: -8.00%
 Future Net Salvage Rate: -8.00%

Broad Group Procedure

January 1, 2009

	Plant Amt	Depreciation Reserve		Net Plant	
		Amount	Ratio	Amount	Ratio
Recorded	\$22,962,066.14	\$6,591,671.18	0.2871	\$18,207,360.25	0.7929
Computed	\$22,962,066.14	\$7,721,698.32	0.3363	\$17,077,333.11	0.7437
Difference		(\$1,130,027.14)	-0.0492	\$1,130,027.14	0.0492

Generation Arrangement Report

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Account: KEPCo 101/6 370 - KY
 Dispersion: 17.00 - S6
 Average Net Salvage Rate: -8.00%
 Future Net Salvage Rate: -8.00%
 Broad Group Procedure
 January 1, 2009

Vintage	Age	Surviving Plant	Avg Life	Remaining Life	Net Plant Ratio	Alloc Factor	Computed Net Plant	Accrual
2008	0.50	\$1,867,577.83	17.00	16.50	1.0482	1.0000	\$1,957,661.00	\$118,646.12
2007	1.50	\$1,483,499.70	17.00	15.50	0.9847	1.0000	\$1,460,810.88	\$94,245.86
2006	2.50	\$8,964,812.56	17.00	14.50	0.9212	1.0000	\$8,258,174.40	\$569,529.27
2005	3.50	\$2,636,906.08	17.00	13.50	0.8576	1.0000	\$2,261,534.74	\$167,521.09
2004	4.50	\$634,480.58	17.00	12.50	0.7941	1.0000	\$503,852.23	\$40,308.18
2003	5.50	\$388,920.90	17.00	11.50	0.7306	1.0000	\$284,141.03	\$24,707.92
2002	6.50	\$308,251.53	17.00	10.50	0.6671	1.0000	\$205,621.90	\$19,583.04
2001	7.50	\$408,985.60	17.00	9.50	0.6035	1.0000	\$246,834.84	\$25,982.61
2000	8.50	\$954,779.05	17.00	8.50	0.5400	1.0000	\$515,580.69	\$60,656.55
1999	9.50	\$618,158.77	17.00	7.50	0.4765	1.0000	\$294,534.47	\$39,271.26
1998	10.50	\$834,754.02	17.00	6.50	0.4129	1.0000	\$344,704.31	\$53,031.43
1997	11.50	\$696,911.27	17.00	5.50	0.3494	1.0000	\$243,508.06	\$44,274.36
1996	12.50	\$421,858.08	17.00	4.50	0.2859	1.0000	\$120,617.69	\$26,800.40
1995	13.50	\$534,442.64	17.00	3.51	0.2231	1.0000	\$119,229.46	\$33,952.83
1994	14.50	\$868,415.56	17.00	2.58	0.1640	1.0000	\$142,413.85	\$55,169.93
1993	15.50	\$569,500.27	17.00	1.81	0.1150	1.0000	\$65,514.92	\$36,180.02
1992	16.50	\$409,969.78	17.00	1.27	0.0806	1.0000	\$33,025.06	\$26,045.14
1991	17.50	\$240,783.05	17.00	0.93	0.0590	1.0000	\$14,211.49	\$15,296.81
1990	18.50	\$98,497.80	17.00	0.73	0.0464	1.0000	\$4,566.51	\$6,257.51
1989	19.50	\$18,174.32	17.00	0.62	0.0392	1.0000	\$711.62	\$1,154.60
1988	20.50	\$2,279.49	17.00	0.56	0.0354	1.0000	\$80.74	\$144.81
1987	21.50	\$107.76	17.00	0.47	0.0300	1.0000	\$3.23	\$6.85
1986	22.50	(\$0.50)	17.00	0.00	0.0000	0.0000	\$0.00	\$0.00
		\$22,962,066.14	17.00	11.71	0.7437	1.0000	\$17,077,333.11	\$1,458,766.59

Depreciation Reserve Summary

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Account: KEPCo 101/6 371 - KY
 Scenario: KEPCO DISTRIBUTION 2008 NEW
 Version: 14 - R0.5

Average Net Salvage Rate: -15.00%
 Future Net Salvage Rate: -15.00%

Broad Group Procedure

January 1, 2009

	Plant Amt	Depreciation Reserve		Net Plant	
		Amount	Ratio	Amount	Ratio
Recorded	\$18,001,253.13	\$5,252,970.70	0.2918	\$15,448,470.40	0.8582
Computed	\$18,001,253.13	\$6,153,500.98	0.3418	\$14,547,940.12	0.8082
Difference		(\$900,530.28)	-0.0500	\$900,530.28	0.0500

Generation Arrangement Report

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Account: KEPCo 101/6 371 - KY
 Dispersion: 14.00 - R0.5
 Average Net Salvage Rate: -15.00%
 Future Net Salvage Rate: -15.00%
 Broad Group Procedure
 January 1, 2009

Vintage	Age	Surviving Plant	Avg Life	Remaining Life	Net Plant Ratio	Alloc Factor	Computed Net Plant	Accrual
2008	0.50	\$1,467,151.75	14.00	13.69	1.1245	1.0000	\$1,649,840.53	\$120,516.04
2007	1.50	\$1,415,262.77	14.00	13.07	1.0740	1.0000	\$1,519,927.27	\$116,253.73
2006	2.50	\$1,484,196.01	14.00	12.46	1.0239	1.0000	\$1,519,638.91	\$121,916.10
2005	3.50	\$1,610,970.21	14.00	11.86	0.9743	1.0000	\$1,569,491.27	\$132,329.70
2004	4.50	\$1,375,055.71	14.00	11.26	0.9250	1.0000	\$1,271,939.96	\$112,951.00
2003	5.50	\$1,997,490.31	14.00	10.67	0.8762	1.0000	\$1,750,120.33	\$164,079.56
2002	6.50	\$1,251,659.97	14.00	10.08	0.8278	1.0000	\$1,036,140.09	\$102,814.93
2001	7.50	\$670,306.85	14.00	9.50	0.7801	1.0000	\$522,921.29	\$55,060.92
2000	8.50	\$991,714.53	14.00	8.93	0.7333	1.0000	\$727,209.86	\$81,462.26
1999	9.50	\$1,233,750.01	14.00	8.37	0.6875	1.0000	\$848,180.73	\$101,343.75
1998	10.50	\$402,097.32	14.00	7.83	0.6428	1.0000	\$258,474.60	\$33,029.42
1997	11.50	\$995,668.14	14.00	7.30	0.5994	1.0000	\$596,814.79	\$81,787.03
1996	12.50	\$291,454.56	14.00	6.79	0.5573	1.0000	\$162,439.71	\$23,940.91
1995	13.50	\$303,594.53	14.00	6.29	0.5166	1.0000	\$156,844.30	\$24,938.12
1994	14.50	\$529,311.80	14.00	5.81	0.4773	1.0000	\$252,621.95	\$43,479.18
1993	15.50	\$624,631.65	14.00	5.35	0.4393	1.0000	\$274,372.28	\$51,309.03
1992	16.50	\$342,697.53	14.00	4.90	0.4025	1.0000	\$137,939.65	\$28,150.15
1991	17.50	\$272,414.91	14.00	4.47	0.3669	1.0000	\$99,960.44	\$22,376.94
1990	18.50	\$180,377.27	14.00	4.05	0.3324	1.0000	\$59,963.43	\$14,816.70
1989	19.50	\$181,301.38	14.00	3.64	0.2988	1.0000	\$54,176.24	\$14,892.61
1988	20.50	\$104,899.22	14.00	3.24	0.2659	1.0000	\$27,892.64	\$8,616.72
1987	21.50	\$88,529.97	14.00	2.84	0.2334	1.0000	\$20,665.26	\$7,272.10
1986	22.50	\$73,667.01	14.00	2.45	0.2010	1.0000	\$14,805.74	\$6,051.22
1985	23.50	\$48,464.37	14.00	2.05	0.1681	1.0000	\$8,149.02	\$3,981.00
1984	24.50	\$37,105.68	14.00	1.64	0.1343	1.0000	\$4,984.78	\$3,047.97
1983	25.50	\$19,546.48	14.00	1.20	0.0990	1.0000	\$1,934.21	\$1,605.60
1982	26.50	\$7,933.69	14.00	0.75	0.0619	1.0000	\$490.84	\$651.70
1981	27.50	(\$0.50)	14.00	0.32	0.0261	1.0000	(\$0.01)	(\$0.04)
		\$18,001,253.13	14.00	9.84	0.6082	1.0000	\$14,547,940.12	\$1,478,674.36

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Depreciation Reserve Summary

Account: KEPCo 101/6 373 - KY
 Scenario: KEPCO DISTRIBUTION 2008 NEW
 Version: 24 - LO
 Average Net Salvage Rate: -2.00%
 Future Net Salvage Rate: -2.00%

Broad Group Procedure

January 1, 2009

	Plant Amt	Depreciation Reserve		Net Plant	
		Amount	Ratio	Amount	Ratio
Recorded	\$2,939,603.17	\$700,716.60	0.2384	\$2,297,678.63	0.7816
Computed	\$2,939,603.17	\$820,842.24	0.2792	\$2,177,552.99	0.7408
Difference		(\$120,125.64)	-0.0409	\$120,125.64	0.0409

Generation Arrangement Report

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Account: KEPCo 101/6 373 - KY
 Dispersion: 24.00 - LD
 Average Net Salvage Rate: -2.00%
 Future Net Salvage Rate: -2.00%

Broad Group Procedure
 January 1, 2009

Vintage	Age	Surviving Plant	Avg Life	Remaining Life	Net Plant Ratio	Alloc Factor	Computed Net Plant	Accrual
2008	0.50	\$141,474.50	24.00	23.58	1.0021	1.0000	\$141,778.13	\$6,012.67
2007	1.50	\$173,112.50	24.00	22.85	0.9713	1.0000	\$168,150.23	\$7,357.28
2006	2.50	\$151,500.50	24.00	22.21	0.9441	1.0000	\$143,030.73	\$6,438.77
2005	3.50	\$155,045.50	24.00	21.63	0.9192	1.0000	\$142,518.46	\$6,589.43
2004	4.50	\$139,549.50	24.00	21.09	0.8962	1.0000	\$125,065.71	\$5,930.85
2003	5.50	\$114,834.50	24.00	20.58	0.8747	1.0000	\$100,440.66	\$4,880.47
2002	6.50	\$90,680.50	24.00	20.10	0.8543	1.0000	\$77,470.12	\$3,853.92
2001	7.50	\$105,554.50	24.00	19.65	0.8350	1.0000	\$88,138.46	\$4,486.07
2000	8.50	\$76,887.73	24.00	19.21	0.8166	1.0000	\$62,783.85	\$3,267.73
1999	9.50	\$84,715.22	24.00	18.80	0.7989	1.0000	\$67,676.54	\$3,600.40
1998	10.50	\$38,145.06	24.00	18.40	0.7818	1.0000	\$29,821.90	\$1,621.17
1997	11.50	\$36,567.39	24.00	18.01	0.7653	1.0000	\$27,983.63	\$1,554.11
1996	12.50	\$43,421.44	24.00	17.63	0.7491	1.0000	\$32,527.07	\$1,845.41
1995	13.50	\$54,669.17	24.00	17.25	0.7333	1.0000	\$40,088.98	\$2,323.44
1994	14.50	\$79,388.39	24.00	16.89	0.7178	1.0000	\$56,987.22	\$3,374.01
1993	15.50	\$141,697.78	24.00	16.53	0.7027	1.0000	\$99,567.95	\$6,022.16
1992	16.50	\$10,074.14	24.00	16.18	0.6879	1.0000	\$6,929.53	\$428.15
1991	17.50	\$44,545.61	24.00	15.84	0.6733	1.0000	\$29,994.09	\$1,893.19
1990	18.50	\$146,181.88	24.00	15.51	0.6591	1.0000	\$96,350.75	\$6,212.73
1989	19.50	\$227,626.68	24.00	15.18	0.6452	1.0000	\$146,862.98	\$9,674.13
1988	20.50	\$128,973.28	24.00	14.86	0.6316	1.0000	\$81,453.66	\$5,481.36
1987	21.50	\$121,744.77	24.00	14.55	0.6182	1.0000	\$75,263.59	\$5,174.15
1986	22.50	\$118,986.20	24.00	14.24	0.6051	1.0000	\$71,999.80	\$5,056.91
1985	23.50	\$65,526.86	24.00	13.94	0.5923	1.0000	\$38,810.17	\$2,784.89
1984	24.50	\$26,049.08	24.00	13.64	0.5797	1.0000	\$15,100.89	\$1,107.09
1983	25.50	\$45,456.85	24.00	13.35	0.5674	1.0000	\$25,791.59	\$1,931.92
1982	26.50	\$85,096.65	24.00	13.07	0.5553	1.0000	\$47,254.60	\$3,616.61
1981	27.50	\$62,364.59	24.00	12.79	0.5435	1.0000	\$33,894.16	\$2,650.50
1980	28.50	\$33,159.55	24.00	12.51	0.5319	1.0000	\$17,636.01	\$1,409.28
1979	29.50	\$8,626.93	24.00	12.25	0.5205	1.0000	\$4,489.95	\$366.64
1978	30.50	\$20,778.56	24.00	11.98	0.5093	1.0000	\$10,581.85	\$883.09
1977	31.50	\$6,696.29	24.00	11.72	0.4983	1.0000	\$3,336.77	\$284.59
1976	32.50	\$5,436.47	24.00	11.47	0.4875	1.0000	\$2,650.47	\$231.05

Generation Arrangement Report

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Account: KEPCo 101/6 373 - KY
 Dispersion: 24.00 - LO
 Average Net Salvage Rate: -2.00%
 Future Net Salvage Rate: -2.00%

Broad Group Procedure
 January 1, 2009

Vintage	Age	Surviving Plant	Avg Life	Remaining Life	Net Plant Ratio	Alloc Factor	Computed Net Plant	Accrual
1975	33.50	\$12,535.22	24.00	11.22	0.4770	1.0000	\$5,979.16	\$532.75
1974	34.50	\$10,444.38	24.00	10.98	0.4666	1.0000	\$4,873.51	\$443.89
1973	35.50	\$20,798.47	24.00	10.74	0.4564	1.0000	\$9,492.95	\$883.93
1972	36.50	\$4,370.39	24.00	10.50	0.4464	1.0000	\$1,951.04	\$185.74
1971	37.50	\$6,660.52	24.00	10.27	0.4366	1.0000	\$2,907.85	\$283.07
1970	38.50	\$17,322.84	24.00	10.05	0.4269	1.0000	\$7,395.42	\$736.22
1969	39.50	\$10,680.46	24.00	9.82	0.4175	1.0000	\$4,458.91	\$453.92
1968	40.50	\$11,148.78	24.00	9.60	0.4081	1.0000	\$4,550.11	\$473.82
1967	41.50	\$24,501.11	24.00	9.39	0.3990	1.0000	\$9,774.96	\$1,041.30
1966	42.50	\$9,965.27	24.00	9.18	0.3899	1.0000	\$3,885.94	\$423.52
1965	43.50	\$10,323.46	24.00	8.97	0.3811	1.0000	\$3,933.84	\$438.75
1964	44.50	\$4,309.60	24.00	8.76	0.3723	1.0000	\$1,604.63	\$183.16
1963	45.50	\$6,987.70	24.00	8.56	0.3638	1.0000	\$2,542.22	\$296.98
1962	46.50	\$4,986.90	24.00	8.36	0.3554	1.0000	\$1,772.13	\$211.94
1961	47.50	(\$0.50)	24.00	8.17	0.3470	1.0000	(\$0.17)	(\$0.02)
		\$2,939,603.17	24.00	17.43	0.7408	1.0000	\$2,177,552.99	\$124,933.13

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KENTUCKY POWER COMPANY
DEPRECIATION STUDY AS OF 12-31-08
GENERAL PLANT WORKPAPERS

LIFE ANALYSIS

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KENTUCKY POWER COMPANY
Depreciation Study as of December 31, 2008
General Plant

Account	<u>3892 RIGHTS OF WAY</u>	
Depreciable Balance	\$219,615	
	<u>Current</u>	<u>Recommended</u>
Average Service Life (Yrs)	75	75
Iowa Curve	R4.0	R4.0
Gross Removal, %		0%
Gross Salvage, %		0%
Net Salvage %	0%	0%

There have been no retirements in this account. Therefore, no actuarial analysis was done.
The recommendation is to continue the current 75 year average service life following
an R4.0 type dispersion.

No removal or salvage is expected from the retirement of rights-of way.

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KENTUCKY POWER COMPANY
 Depreciation Study as of December 31, 2008
 General Plant

Account	<u>390 STRUCTURES & IMPROVEMENTS</u>	
Depreciable Balance	\$19,910,322	
	<u>Current</u>	<u>Recommended</u>
Average Service Life (Yrs)	45	28
Iowa Curve	L3.0	L3.0
Gross Removal, %		0%
Gross Salvage, %		11%
Net Salvage %	0%	11%

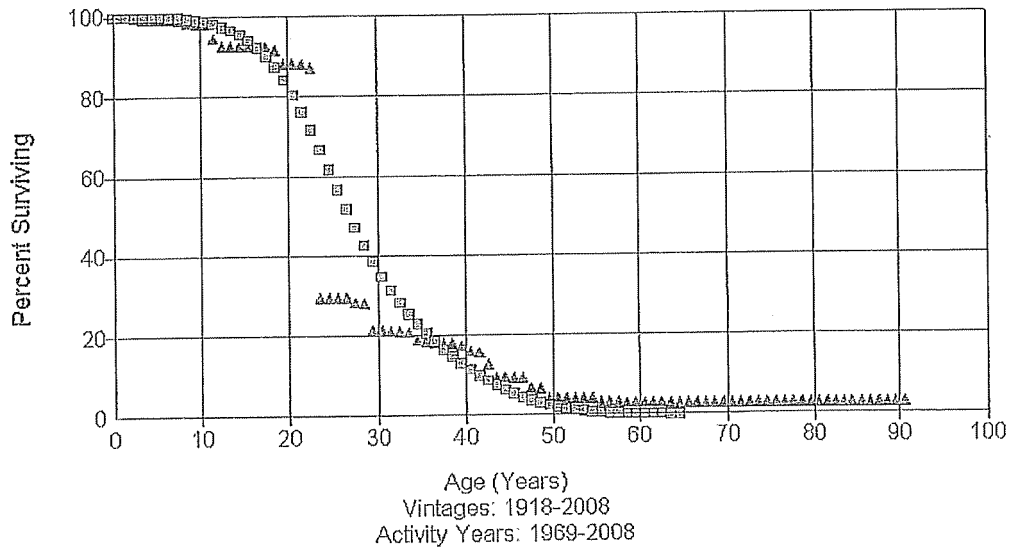
 The actuarial analyses show the average service life for this account has decreased. Based on the results of the 40 year band analysis, the recommendation is to move to a 28 year average service life following an L3.0 type dispersion.

Gross salvage could be expected from the sale of service center buildings

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Account: KEPCo 101/6 390 - KY
Scenario: KEPCO ACCT 390 2008

▲ Actual Data □ L3 27.94



Actuarial Life Analysis

Account: KEPCo 101/6 390 - KY
Scenario: KEPCO ACCT 390 2008
Placement Band: 1918 - 2008
Function: Survivorship Annual Rate Method
Weighting: Unweighted
T-Cut: None

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Observation	Censoring		Error Sum	Best Fit	
Band	Age	Percent	of Squares	Disp	ASL
1969 -2008	90.5	2.77	0.55789224	L3	27.94

Observed Life Table

Scenario: KEPCO ACCT 390 2008
 Account: KEPCo 101/6 390 - KY
 Placement Band: 1918 - 2008

Observation Band: 1969 - 2008

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Age at Beginning of Interval	Exposures at Beginning of Interval	Retirements During Interval	Retirement Ratio	Survivor Ratio	Percent Surv at Beginning of Interval
0	32,371,761.83	0.00	0.00000	1.00000	100.00
0.5	32,376,068.21	603.00	0.00002	0.99998	100.00
1.5	32,345,773.19	103,309.00	0.00319	0.99681	100.00
2.5	31,803,602.83	49,424.00	0.00155	0.99845	99.68
3.5	31,511,043.51	12,121.00	0.00038	0.99962	99.53
4.5	31,368,714.91	19,811.00	0.00063	0.99937	99.49
5.5	31,352,034.91	55,342.00	0.00177	0.99823	99.43
6.5	31,293,807.67	3,901.00	0.00012	0.99988	99.25
7.5	31,279,448.84	254,535.00	0.00814	0.99186	99.24
8.5	30,668,631.41	79,617.00	0.00260	0.99740	98.43
9.5	30,680,038.41	38,893.00	0.00127	0.99873	98.17
10.5	30,566,819.41	1,096,646.00	0.03588	0.96412	98.05
11.5	29,156,450.41	565,743.00	0.01940	0.98060	94.53
12.5	27,581,670.97	25,519.00	0.00093	0.99907	92.70
13.5	27,072,680.97	42,855.00	0.00158	0.99842	92.61
14.5	27,000,390.97	10,059.00	0.00037	0.99963	92.46
15.5	26,971,578.97	5,783.00	0.00021	0.99979	92.43
16.5	26,807,772.97	13,171.00	0.00049	0.99951	92.41
17.5	26,404,768.97	231,286.00	0.00876	0.99124	92.36
18.5	14,220,198.52	531,837.00	0.03740	0.96260	91.55
19.5	13,668,606.52	3,550.00	0.00026	0.99974	88.13
20.5	13,662,663.52	17,530.00	0.00128	0.99872	88.11
21.5	13,633,645.77	140,513.00	0.01031	0.98969	88.00
22.5	13,481,099.77	8,906,128.00	0.66064	0.33936	87.09
23.5	4,573,215.77	15,721.00	0.00344	0.99656	29.55
24.5	4,557,816.77	14,620.00	0.00321	0.99679	29.45
25.5	4,531,133.77	2,679.00	0.00059	0.99941	29.36
26.5	4,524,762.77	176,311.00	0.03897	0.96103	29.34
27.5	619,968.00	3,775.00	0.00609	0.99391	28.20
28.5	602,533.00	142,637.00	0.23673	0.76327	28.03
29.5	445,224.00	460.00	0.00103	0.99897	21.39
30.5	472,049.00	7,111.00	0.01506	0.98494	21.37
31.5	484,562.00	5,297.00	0.01093	0.98907	21.05
32.5	473,110.00	4,886.00	0.01033	0.98967	20.82
33.5	456,033.00	37,541.00	0.08232	0.91768	20.60
34.5	404,339.00	9,576.00	0.02368	0.97632	18.90
35.5	390,667.00	6,392.00	0.01636	0.98364	18.45
36.5	388,215.00	7,479.00	0.01927	0.98073	18.15
37.5	380,736.00	551.00	0.00145	0.99855	17.80
38.5	379,315.00	9,675.00	0.02551	0.97449	17.77
39.5	359,864.00	30,779.00	0.08553	0.91447	17.32
40.5	295,029.00	4,432.00	0.01502	0.98498	15.84
41.5	349,398.00	67,421.00	0.19296	0.80704	15.60
42.5	281,513.00	71,514.00	0.25403	0.74597	12.59
43.5	209,999.00	12.00	0.00006	0.99994	9.39
44.5	209,987.00	2,203.00	0.01049	0.98951	9.39
45.5	207,303.00	100.00	0.00048	0.99952	9.29
46.5	206,754.00	59,911.00	0.28977	0.71023	9.29
47.5	146,395.00	2,370.00	0.01619	0.98381	6.60
48.5	128,780.00	47,943.00	0.37229	0.62771	6.49
49.5	73,933.00	0.00	0.00000	1.00000	4.07
50.5	73,408.00	0.00	0.00000	1.00000	4.07
51.5	73,261.00	0.00	0.00000	1.00000	4.07
52.5	73,261.00	344.00	0.00470	0.99530	4.07

Observed Life Table

Scenario: KEPCO ACCT 390 2008
 Account: KEPCo 101/6 390 - KY
 Placement Band: 1918 - 2008

Observation Band: 1969 - 2008

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Age at Beginning of Interval	Exposures at Beginning of Interval	Retirements During Interval	Refirmment Ratio	Survivor Ratio	Percent Surv at Beginning of Interval
53.5	72,917.00	0.00	0.00000	1.00000	4.05
54.5	72,917.00	18,000.00	0.24686	0.75314	4.05
55.5	54,412.00	784.00	0.01441	0.98559	3.05
56.5	53,531.00	0.00	0.00000	1.00000	3.01
57.5	53,531.00	3,940.00	0.07360	0.92640	3.01
58.5	49,287.00	0.00	0.00000	1.00000	2.79
59.5	48,171.00	0.00	0.00000	1.00000	2.79
60.5	47,635.00	0.00	0.00000	1.00000	2.79
61.5	47,635.00	0.00	0.00000	1.00000	2.79
62.5	47,635.00	368.00	0.00773	0.99227	2.79
63.5	46,833.00	0.00	0.00000	1.00000	2.77
64.5	46,511.00	0.00	0.00000	1.00000	2.77
65.5	46,511.00	0.00	0.00000	1.00000	2.77
66.5	44,627.00	0.00	0.00000	1.00000	2.77
67.5	44,510.00	0.00	0.00000	1.00000	2.77
68.5	44,080.00	0.00	0.00000	1.00000	2.77
69.5	43,738.00	0.00	0.00000	1.00000	2.77
70.5	0.00	0.00	0.00000	1.00000	2.77

Surviving Percent Report

Scenario: KEPCO ACCT 390 2008
Account: KEPCO 101/6 390 - KY
Placement Band: 1918 - 2008

Observation Band: 1969 - 2008

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Age	Actual	L3 27.94
0.0	100.00	100.00
0.5	100.00	100.00
1.5	100.00	100.00
2.5	99.68	100.00
3.5	99.52	100.00
4.5	99.49	99.98
5.5	99.42	99.94
6.5	99.25	99.84
7.5	99.23	99.71
8.5	98.43	99.45
9.5	98.17	99.07
10.5	98.05	98.70
11.5	94.53	98.06
12.5	92.70	97.45
13.5	92.61	96.44
14.5	92.46	95.49
15.5	92.43	93.89
16.5	92.41	91.82
17.5	92.36	89.89
18.5	91.55	86.76
19.5	88.13	83.98
20.5	88.11	79.70
21.5	87.99	76.12
22.5	87.09	70.93
23.5	29.55	65.43
24.5	29.45	61.22
25.5	29.36	55.61
26.5	29.34	51.51
27.5	28.20	46.29
28.5	28.03	41.43
29.5	21.39	38.06
30.5	21.37	33.93
31.5	21.05	31.11
32.5	20.82	27.68
33.5	20.60	25.35
34.5	18.91	22.51
35.5	18.46	19.95
36.5	18.16	18.18
37.5	17.81	16.01
38.5	17.78	14.51
39.5	17.33	12.65
40.5	15.85	11.36
41.5	15.61	9.78
42.5	12.60	8.34
43.5	9.40	7.35
44.5	9.40	6.16
45.5	9.30	5.35
46.5	9.29	4.38
47.5	6.60	3.54
48.5	6.49	2.99
49.5	4.08	2.34
50.5	4.08	1.93
51.5	4.08	1.46
52.5	4.08	1.17
53.5	4.06	0.84

Surviving Percent Report

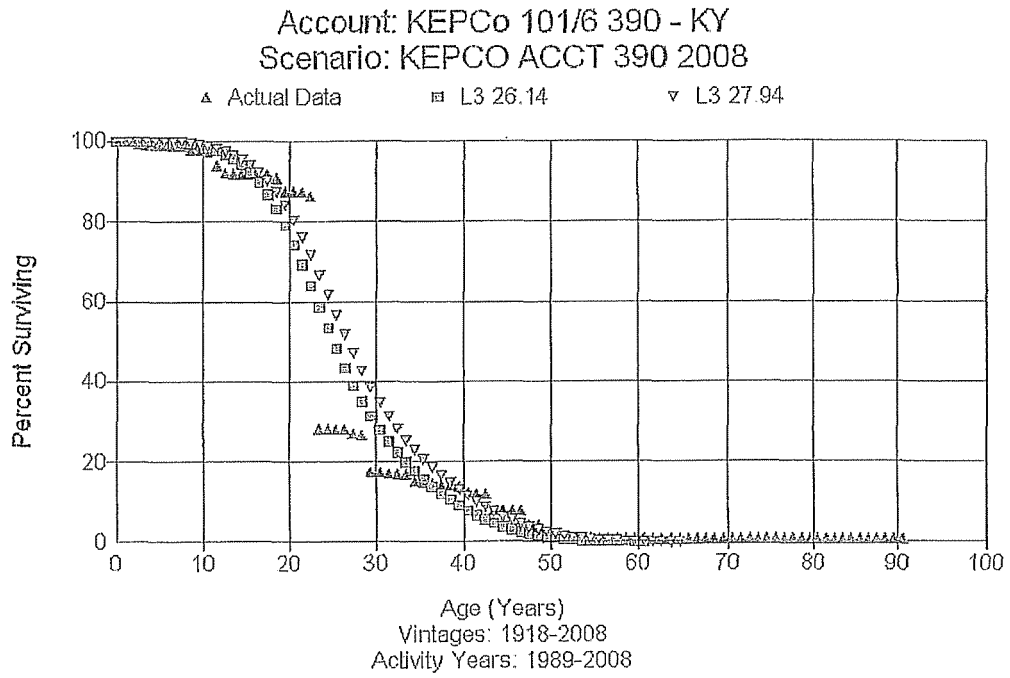
Scenario: KEPCO ACCT 390 2008
Account: KEPCo 101/6 390 - KY
Placement Band: 1918 - 2008

Observation Band: 1969- 2008

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Age	Actual	L3 27.94
54.5	4.06	0.59
55.5	3.06	0.44
56.5	3.01	0.29
57.5	3.01	0.20
58.5	2.79	0.12
59.5	2.79	0.08
60.5	2.79	0.04
61.5	2.79	0.02
62.5	2.79	0.01
63.5	2.77	0
64.5	2.77	0
65.5	2.77	0
66.5	2.77	0
67.5	2.77	
68.5	2.77	
69.5	2.77	
70.5	2.77	
71.5	2.77	
72.5	2.77	
73.5	2.77	
74.5	2.77	
75.5	2.77	
76.5	2.77	
77.5	2.77	
78.5	2.77	
79.5	2.77	
80.5	2.77	
81.5	2.77	
82.5	2.77	
83.5	2.77	
84.5	2.77	
85.5	2.77	
86.5	2.77	
87.5	2.77	
88.5	2.77	
89.5	2.77	
90.5	2.77	

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Actuarial Life Analysis

Account: KEPCo 101/6 390 - KY
Scenario: KEPCO ACCT 390 2008
Placement Band: 1918 - 2008
Function: Survivorship Annual Rate Method
Weighting: Unweighted
T-Cut: None

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Observation	Censoring		Error Sum	Best Fit	
Band	Age	Percent	of Squares	Disp	ASL
1989 -2008	90.5	0.63	0.41746662	L3	26.14

Observed Life Table

Scenario: KEPCO ACCT 390 2008
 Account: KEPCO 101/6 390 - KY
 Placement Band: 1918 - 2008

Observation Band: 1989 - 2008

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Age at Beginning of Interval	Exposures at Beginning of Interval	Retirements During Interval	Retirement Ratio	Survivor Ratio	Percent Surv at Beginning of Interval
0	18,121,974.31	0.00	0.00000	1.00000	100.00
0.5	18,094,338.69	574.00	0.00003	0.99997	100.00
1.5	18,075,866.42	103,069.00	0.00570	0.99430	100.00
2.5	17,574,006.06	49,424.00	0.00281	0.99719	99.43
3.5	17,770,167.74	11,372.00	0.00064	0.99936	99.15
4.5	17,623,175.14	19,811.00	0.00112	0.99888	99.09
5.5	17,615,819.14	54,476.00	0.00309	0.99691	98.98
6.5	17,667,250.90	3,500.00	0.00020	0.99980	98.67
7.5	30,299,989.84	253,871.00	0.00838	0.99162	98.65
8.5	29,688,719.41	79,517.00	0.00268	0.99732	97.82
9.5	29,658,454.41	26,799.00	0.00090	0.99910	97.56
10.5	29,855,601.41	1,096,487.00	0.03673	0.96327	97.47
11.5	28,444,500.41	565,059.00	0.01987	0.98013	93.89
12.5	26,773,250.97	25,199.00	0.00094	0.99906	92.02
13.5	26,276,891.97	41,731.00	0.00159	0.99841	91.93
14.5	26,558,574.97	9,966.00	0.00038	0.99962	91.78
15.5	26,533,945.97	5,623.00	0.00021	0.99979	91.75
16.5	26,369,308.97	12,636.00	0.00048	0.99952	91.73
17.5	25,966,839.97	226,885.00	0.00874	0.99126	91.69
18.5	13,786,270.52	531,837.00	0.03858	0.96142	90.89
19.5	13,336,533.52	3,550.00	0.00027	0.99973	87.38
20.5	13,372,922.52	17,530.00	0.00131	0.99869	87.36
21.5	13,351,847.77	140,385.00	0.01051	0.98949	87.25
22.5	13,206,217.77	8,906,128.00	0.67439	0.32561	86.33
23.5	4,327,026.77	12,392.00	0.00286	0.99714	28.11
24.5	4,328,312.77	14,620.00	0.00338	0.99662	28.03
25.5	4,304,062.77	1,907.00	0.00044	0.99956	27.94
26.5	4,295,891.77	175,590.00	0.04087	0.95913	27.93
27.5	390,732.00	3,775.00	0.00966	0.99034	26.79
28.5	405,162.00	141,208.00	0.34852	0.65148	26.53
29.5	328,345.00	387.00	0.00118	0.99882	17.28
30.5	312,021.00	4,735.00	0.01518	0.98482	17.26
31.5	307,189.00	3,068.00	0.00999	0.99001	17.00
32.5	401,733.00	3,405.00	0.00848	0.99152	16.83
33.5	385,353.00	37,541.00	0.09742	0.90258	16.69
34.5	333,659.00	9,576.00	0.02870	0.97130	15.06
35.5	320,492.00	6,392.00	0.01994	0.98006	14.63
36.5	315,091.00	6,670.00	0.02117	0.97863	14.34
37.5	308,421.00	551.00	0.00179	0.99821	14.04
38.5	305,968.00	9,675.00	0.03162	0.96838	14.01
39.5	284,539.00	30,779.00	0.10817	0.89183	13.57
40.5	220,240.00	4,432.00	0.02012	0.97988	12.10
41.5	209,577.00	2,389.00	0.01140	0.98660	11.86
42.5	205,524.00	71,514.00	0.34796	0.65204	11.72
43.5	134,444.00	12.00	0.00009	0.99991	7.64
44.5	134,754.00	867.00	0.00643	0.99357	7.64
45.5	133,406.00	100.00	0.00075	0.99925	7.59
46.5	134,397.00	59,911.00	0.44578	0.55422	7.58
47.5	74,155.00	1,170.00	0.01578	0.98422	4.20
48.5	58,170.00	44,849.00	0.77100	0.22900	4.13
49.5	6,759.00	0.00	0.00000	1.00000	0.95
50.5	50,340.00	0.00	0.00000	1.00000	0.95
51.5	68,193.00	0.00	0.00000	1.00000	0.95
52.5	68,193.00	0.00	0.00000	1.00000	0.95

Observed Life Table

Scenario: KEPCO ACCT 390 2008
 Account: KEPCo 101/6 390 - KY
 Placement Band: 1918 - 2008

Observation Band: 1989 - 2008

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Age at Beginning of Interval	Exposures at Beginning of Interval	Retirements During Interval	Retirement Ratio	Survivor Ratio	Percent Surv at Beginning of Interval
53.5	68,977.00	0.00	0.00000	1.00000	0.95
54.5	68,977.00	18,000.00	0.26096	0.73904	0.95
55.5	50,472.00	784.00	0.01553	0.98447	0.70
56.5	53,531.00	0.00	0.00000	1.00000	0.69
57.5	53,531.00	3,940.00	0.07360	0.92640	0.69
58.5	49,287.00	0.00	0.00000	1.00000	0.64
59.5	48,171.00	0.00	0.00000	1.00000	0.64
60.5	47,635.00	0.00	0.00000	1.00000	0.64
61.5	47,635.00	0.00	0.00000	1.00000	0.64
62.5	47,635.00	368.00	0.00773	0.99227	0.64
63.5	46,833.00	0.00	0.00000	1.00000	0.64
64.5	46,511.00	0.00	0.00000	1.00000	0.64
65.5	46,511.00	0.00	0.00000	1.00000	0.64
66.5	44,627.00	0.00	0.00000	1.00000	0.64
67.5	44,510.00	0.00	0.00000	1.00000	0.64
68.5	44,080.00	0.00	0.00000	1.00000	0.64
69.5	43,738.00	0.00	0.00000	1.00000	0.64
70.5	0.00	0.00	0.00000	1.00000	0.64

Surviving Percent Report

Scenario: KEPCO ACCT 390 2008
 Account: KEPCo 101/6 390 - KY
 Placement Band: 1918 - 2008

Observation Band: 1989- 2008

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Age	Actual	L3 26.14	L3 28.00
0.0	100.00	100.00	100.00
0.5	100.00	100.00	100.00
1.5	100.00	100.00	100.00
2.5	99.43	100.00	100.00
3.5	99.15	100.00	100.00
4.5	99.08	99.97	99.98
5.5	98.97	99.90	99.94
6.5	98.67	99.80	99.84
7.5	98.65	99.59	99.71
8.5	97.82	99.28	99.45
9.5	97.56	98.83	99.18
10.5	97.47	98.23	98.70
11.5	93.89	97.67	98.06
12.5	92.03	96.72	97.45
13.5	91.94	95.49	96.44
14.5	91.79	93.89	95.49
15.5	91.76	91.82	93.89
16.5	91.74	89.17	92.39
17.5	91.69	86.76	89.89
18.5	90.89	82.97	86.76
19.5	87.39	78.54	83.98
20.5	87.36	73.57	79.70
21.5	87.25	68.21	76.12
22.5	86.33	62.62	70.93
23.5	28.11	58.40	66.83
24.5	28.03	52.87	61.22
25.5	27.94	47.57	55.61
26.5	27.92	42.61	51.51
27.5	26.78	38.06	46.29
28.5	26.52	33.93	42.61
29.5	17.28	31.11	38.06
30.5	17.26	27.68	34.92
31.5	17.00	24.61	31.11
32.5	16.83	21.85	27.68
33.5	16.68	19.35	25.35
34.5	15.06	17.62	22.51
35.5	14.63	15.50	20.57
36.5	14.34	13.56	18.18
37.5	14.03	11.78	16.54
38.5	14.01	10.16	14.51
39.5	13.56	8.69	12.65
40.5	12.10	7.67	11.36
41.5	11.85	6.45	9.78
42.5	11.72	5.35	8.69
43.5	7.64	4.38	7.35
44.5	7.64	3.54	6.45
45.5	7.59	2.81	5.35
46.5	7.59	2.34	4.38
47.5	4.20	1.80	3.74
48.5	4.14	1.36	2.99
49.5	0.95	1.00	2.49
50.5	0.95	0.74	1.93
51.5	0.95	0.49	1.57
52.5	0.95	0.36	1.17
53.5	0.95	0.23	0.84

Surviving Percent Report

Scenario: KEPCO ACCT 390 2008
Account: KEPCo 101/6 390 - KY
Placement Band: 1918 - 2008

Observation Band: 1989- 2008

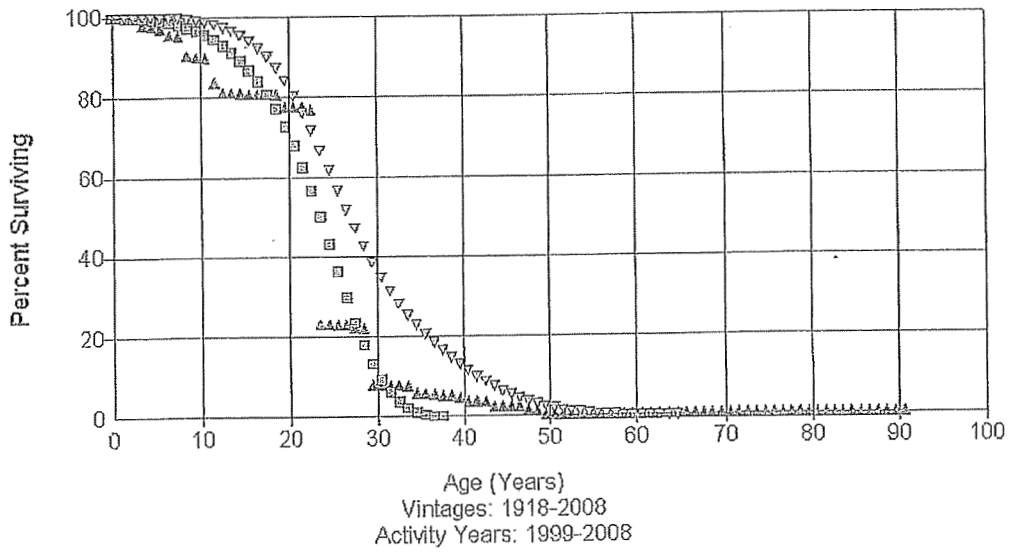
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Age	Actual	L3 26.14	L3 28.00
54.5	0.95	0.14	0.65
55.5	0.70	0.08	0.44
56.5	0.69	0.04	0.32
57.5	0.69	0.02	0.20
58.5	0.64	0.01	0.14
59.5	0.64	0	0.08
60.5	0.64	0	0.04
61.5	0.64	0	0.02
62.5	0.64		0.01
63.5	0.63		0
64.5	0.63		0
65.5	0.63		0
66.5	0.63		0
67.5	0.63		
68.5	0.63		
69.5	0.63		
70.5	0.63		
71.5	0.63		
72.5	0.63		
73.5	0.63		
74.5	0.63		
75.5	0.63		
76.5	0.63		
77.5	0.63		
78.5	0.63		
79.5	0.63		
80.5	0.63		
81.5	0.63		
82.5	0.63		
83.5	0.63		
84.5	0.63		
85.5	0.63		
86.5	0.63		
87.5	0.63		
88.5	0.63		
89.5	0.63		
90.5	0.63		

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Account: KEPCo 101/6 390 - KY
Scenario: KEPCO ACCT 390 2008

△ Actual Data □ R3 22.55 ▽ L3 27.94



Actuarial Life Analysis

Account: KEPCo 101/6 390 - KY
Scenario: KEPCO ACCT 390 2008
Placement Band: 1918 - 2008
Function: Survivorship Annual Rate Method
Weighting: Unweighted
T-Cut: None

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Observation	Censoring		Error Sum	Best Fit	
Band	Age	Percent	of Squares	Disp	ASL
1999 -2008	90.5	0.19	0.29569838	R3	22.55

Observed Life Table

Scenario: KEPCO ACCT 390 2008
 Account: KEPCo 101/6 390 - KY
 Placement Band: 1918 - 2008

Observation Band: 1999 - 2008

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Age at Beginning of Interval	Exposures at Beginning of Interval	Retirements During Interval	Retirement Ratio	Survivor Ratio	Percent Surv at Beginning of Interval
0	1,389,797.42	0.00	0.00000	1.00000	100.00
0.5	1,487,258.80	0.00	0.00000	1.00000	100.00
1.5	1,767,426.78	0.00	0.00000	1.00000	100.00
2.5	2,673,783.86	48,288.00	0.01806	0.98194	100.00
3.5	2,903,099.54	11,372.00	0.00392	0.99608	98.19
4.5	2,848,531.94	19,811.00	0.00695	0.99305	97.61
5.5	2,857,724.94	48,668.00	0.01703	0.98297	97.13
6.5	4,472,906.70	3,500.00	0.00078	0.99922	95.48
7.5	4,891,867.87	253,871.00	0.05190	0.94810	95.41
8.5	16,253,240.89	79,517.00	0.00489	0.99511	90.46
9.5	16,204,848.89	26,799.00	0.00165	0.99835	90.02
10.5	16,112,175.89	1,094,961.00	0.06796	0.93204	89.87
11.5	14,719,148.64	458,999.00	0.03118	0.96882	83.76
12.5	13,195,033.20	1,647.00	0.00012	0.99988	81.15
13.5	13,221,369.20	41,731.00	0.00316	0.99684	81.14
14.5	13,168,442.20	9,966.00	0.00076	0.99924	80.88
15.5	13,141,673.20	5,623.00	0.00043	0.99957	80.82
16.5	13,087,400.20	9,300.00	0.00071	0.99929	80.79
17.5	25,335,980.97	20,378.00	0.00080	0.99920	80.73
18.5	13,378,864.52	526,644.00	0.03936	0.96064	80.67
19.5	12,848,036.52	3,550.00	0.00028	0.99972	77.49
20.5	12,866,758.52	7,530.00	0.00059	0.99941	77.47
21.5	12,850,929.77	103,307.00	0.00804	0.99196	77.42
22.5	12,741,787.77	8,906,128.00	0.69897	0.30103	76.80
23.5	3,846,517.77	4,892.00	0.00127	0.99873	23.12
24.5	4,170,066.77	14,620.00	0.00351	0.99649	23.09
25.5	4,147,978.77	1,907.00	0.00046	0.99954	23.01
26.5	4,139,014.77	175,590.00	0.04242	0.95758	23.00
27.5	233,395.00	1,775.00	0.00761	0.99239	22.02
28.5	221,225.00	141,208.00	0.63830	0.36170	21.85
29.5	121,130.00	387.00	0.00319	0.99681	7.90
30.5	139,290.00	4,735.00	0.03399	0.96601	7.87
31.5	141,084.00	499.00	0.00354	0.99646	7.60
32.5	141,756.00	1,562.00	0.01102	0.98898	7.57
33.5	156,660.00	37,541.00	0.23963	0.76037	7.49
34.5	116,644.00	735.00	0.00630	0.99370	5.70
35.5	114,246.00	6,392.00	0.05595	0.94405	5.66
36.5	108,647.00	6,670.00	0.06139	0.93861	5.34
37.5	102,437.00	551.00	0.00538	0.99462	5.01
38.5	132,048.00	9,675.00	0.07327	0.92673	4.98
39.5	175,915.00	30,779.00	0.17497	0.82503	4.62
40.5	111,964.00	4,432.00	0.03958	0.96042	3.81
41.5	102,618.00	2,389.00	0.02328	0.97672	3.66
42.5	202,072.00	71,514.00	0.35390	0.64610	3.57
43.5	130,558.00	12.00	0.00009	0.99991	2.31
44.5	130,546.00	867.00	0.00664	0.99336	2.31
45.5	129,703.00	100.00	0.00077	0.99923	2.29
46.5	129,801.00	59,911.00	0.46156	0.53844	2.29
47.5	69,442.00	1,170.00	0.01685	0.98315	1.23
48.5	53,331.00	44,849.00	0.84096	0.15904	1.21
49.5	2,694.00	0.00	0.00000	1.00000	0.19
50.5	2,705.00	0.00	0.00000	1.00000	0.19
51.5	2,558.00	0.00	0.00000	1.00000	0.19
52.5	2,558.00	0.00	0.00000	1.00000	0.19

Observed Life Table

Scenario: KEPCO ACCT 390 2008
 Account: KEPCo 101/6 390 - KY
 Placement Band: 1918 - 2008

Observation Band: 1999 - 2008

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Age at Beginning of Interval	Exposures at Beginning of Interval	Retirements During Interval	Retirement Ratio	Survivor Ratio	Percent Surv at Beginning of Interval
53.5	2,992.00	0.00	0.00000	1.00000	0.19
54.5	3,314.00	0.00	0.00000	1.00000	0.19
55.5	2,809.00	0.00	0.00000	1.00000	0.19
56.5	4,596.00	0.00	0.00000	1.00000	0.19
57.5	4,713.00	0.00	0.00000	1.00000	0.19
58.5	4,839.00	0.00	0.00000	1.00000	0.19
59.5	4,065.00	0.00	0.00000	1.00000	0.19
60.5	47,635.00	0.00	0.00000	1.00000	0.19
61.5	47,635.00	0.00	0.00000	1.00000	0.19
62.5	47,635.00	368.00	0.00773	0.99227	0.19
63.5	46,833.00	0.00	0.00000	1.00000	0.19
64.5	46,511.00	0.00	0.00000	1.00000	0.19
65.5	46,511.00	0.00	0.00000	1.00000	0.19
66.5	44,627.00	0.00	0.00000	1.00000	0.19
67.5	44,510.00	0.00	0.00000	1.00000	0.19
68.5	44,080.00	0.00	0.00000	1.00000	0.19
69.5	43,738.00	0.00	0.00000	1.00000	0.19
70.5	0.00	0.00	0.00000	1.00000	0.19

Surviving Percent Report

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Scenario: KEPCO ACCT 390 2008
 Account: KEPCO 101/6 390 - KY
 Placement Band: 1918 - 2008

Observation Band: 1999- 2008

Age	Actual	R3 22.55	L3 28.00
0.0	100.00	100.00	100.00
0.5	100.00	99.97	100.00
1.5	100.00	99.89	100.00
2.5	100.00	99.74	100.00
3.5	98.19	99.58	100.00
4.5	97.81	99.36	99.98
5.5	97.13	99.01	99.94
6.5	95.47	98.63	99.84
7.5	95.40	98.04	99.71
8.5	90.45	97.43	99.45
9.5	90.01	96.49	99.18
10.5	89.86	95.57	98.70
11.5	83.75	94.47	98.06
12.5	81.14	92.81	97.45
13.5	81.13	91.23	96.44
14.5	80.87	88.90	95.49
15.5	80.81	86.71	93.89
16.5	80.78	83.51	92.39
17.5	80.72	80.63	89.89
18.5	80.66	76.22	86.76
19.5	77.48	72.27	83.98
20.5	77.46	67.84	79.70
21.5	77.41	61.64	76.12
22.5	76.79	56.17	70.93
23.5	23.12	48.83	66.83
24.5	23.09	42.71	61.22
25.5	23.01	35.01	55.61
26.5	23.00	29.03	51.51
27.5	22.02	23.42	46.29
28.5	21.85	17.18	42.61
29.5	7.90	12.93	38.06
30.5	7.88	8.60	34.92
31.5	7.61	5.91	31.11
32.5	7.58	3.41	27.68
33.5	7.50	2.00	25.35
34.5	5.70	1.04	22.51
35.5	5.67	0.35	20.57
36.5	5.35	0.09	18.18
37.5	5.02	0	16.54
38.5	4.99	0	14.51
39.5	4.63	0	12.65
40.5	3.82		11.36
41.5	3.67		9.78
42.5	3.58		8.69
43.5	2.31		7.35
44.5	2.31		6.45
45.5	2.30		5.35
46.5	2.30		4.38
47.5	1.24		3.74
48.5	1.22		2.99
49.5	0.19		2.49
50.5	0.19		1.93
51.5	0.19		1.57
52.5	0.19		1.17
53.5	0.19		0.84

Surviving Percent Report

Scenario: KEPCO ACCT 390 2008

Account: KEPCo 101/6 390 - KY

Placement Band: 1918 - 2008

Observation Band: 1999- 2008

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Age	Actual	R3 22.55	L3 28.00
54.5	0.19		0.65
55.5	0.19		0.44
56.5	0.19		0.32
57.5	0.19		0.20
58.5	0.19		0.14
59.5	0.19		0.08
60.5	0.19		0.04
61.5	0.19		0.02
62.5	0.19		0.01
63.5	0.19		0
64.5	0.19		0
65.5	0.19		0
66.5	0.19		0
67.5	0.19		
68.5	0.19		
69.5	0.19		
70.5	0.19		
71.5	0.19		
72.5	0.19		
73.5	0.19		
74.5	0.19		
75.5	0.19		
76.5	0.19		
77.5	0.19		
78.5	0.19		
79.5	0.19		
80.5	0.19		
81.5	0.19		
82.5	0.19		
83.5	0.19		
84.5	0.19		
85.5	0.19		
86.5	0.19		
87.5	0.19		
88.5	0.19		
89.5	0.19		
90.5	0.19		

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KENTUCKY POWER COMPANY
 Depreciation Study as of December 31, 2008
 General Plant

Account	<u>391 OFFICE FURNITURE AND EQUIPMENT</u>	
Depreciable Balance	\$1,312,821	
	<u>Current</u>	<u>Recommended</u>
Average Service Life (Yrs)	35	35
Iowa Curve	RO.5	RO.5
Gross Removal, %		0%
Gross Salvage, %		0%
Net Salvage %	10%	0%

 No life analysis was conducted for this account since retirements are base on age in accordance with FERC Accounting Release 15. This Accounting Release was adopted by Kentucky Power in June 1998 business.

There would be little if any salvage expected from the retirement of office furniture and equipment.

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KENTUCKY POWER COMPANY
 Depreciation Study as of December 31, 2008
 General Plant

Account	<u>392 TRANSPORTATION EQUIPMENT</u>	
Depreciable Balance	\$9,655	
	<u>Current</u>	<u>Recommended</u>
Average Service Life (Yrs)	30	30
Iowa Curve	R3.0	R3.0
Gross Removal, %		0%
Gross Salvage, %		0%
Net Salvage %	0%	0%

 No life analysis was conducted for this account since retirements are base on age in accordance with FERC Accounting Release 15. This Accounting Release was adopted by Kentucky Power in June 1998 business.

Due to the minimal investment in this account, no salvage or removal costs are expected.

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KENTUCKY POWER COMPANY
Depreciation Study as of December 31, 2008
General Plant

Account	<u>393 STORES EQUIPMENT</u>	
Depreciable Balance	\$142,851	
	<u>Current</u>	<u>Recommended</u>
Average Service Life (Yrs)	30	30
Iowa Curve	R1.0	R1.0
Gross Removal, %		0%
Gross Salvage, %		5%
Net Salvage %	0%	5%

No life analysis was conducted for this account since retirements are base on age in accordance with FERC Accounting Release 15. This Accounting Release was adopted by Kentucky Power in June 1998 business.

A minimal amount of scrap value could result in a small amount of salvage. No removal costs are anticipated.

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KENTUCKY POWER COMPANY
 Depreciation Study as of December 31, 2008
 General Plant

Account 394 TOOLS, SHOP AND GARAGE EQUIPMENT

Depreciable Balance	\$2,579,396	
	<u>Current</u>	<u>Recommended</u>
Average Service Life (Yrs)	30	30
Iowa Curve	RO.5	RO.5
Gross Removal, %		0%
Gross Salvage, %		5%
Net Salvage %	0%	5%

 No life analysis was conducted for this account since retirements are base on age in accordance with FERC Accounting Release 15. This Accounting Release was adopted by Kentucky Power in June 1998 business.

The disposal of tools shop and garage equipment may result in salvage. No removal costs are expected.

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KENTUCKY POWER COMPANY
 Depreciation Study as of December 31, 2008
 General Plant

Account	<u>395 LABORATORY EQUIPMENT</u>	
Depreciable Balance	\$262,378	
	<u>Current</u>	<u>Recommended</u>
Average Service Life (Yrs)	30	30
Iowa Curve	L5.0	L5.0
Gross Removal, %		0%
Gross Salvage, %		5%
Net Salvage %	0%	5%

 No life analysis was conducted for this account since retirements are base on age in accordance with FERC Accounting Release 15. This Accounting Release was adopted by Kentucky Power in June 1998 business.

Scrap sales may result in salvage for the equipment. Minimal removal cost is expected.

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KENTUCKY POWER COMPANY
Depreciation Study as of December 31, 2008
General Plant

Account	<u>396 TRANSPORTATION EQUIPMENT</u>	
Depreciable Balance	\$5,931	
	<u>Current</u>	<u>Recommended</u>
Average Service Life (Yrs)		
Iowa Curve		
Gross Removal, %		0%
Gross Salvage, %		0%
Net Salvage %		0%

No life analysis was conducted for this account since retirements are base on age in accordance with FERC Accounting Release 15. This Accounting Release was adopted by Kentucky Power in June 1998 business.

Due to the minimal investment in this account, no removal or salvage is expected.

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KENTUCKY POWER COMPANY
Depreciation Study as of December 31, 2008
General Plant

Account	<u>397 COMMUNICATION EQUIPMENT</u>	
Depreciable Balance	\$6,755,008	
	<u>Current</u>	<u>Recommended</u>
Average Service Life (Yrs)	22	22
Iowa Curve	L3.0	L3.0
Gross Removal, %		2%
Gross Salvage, %		10%
Net Salvage %	0%	8%

No life analysis was conducted for this account since retirements are base on age in accordance with FERC Accounting Release 15. This Accounting Release was adopted by Kentucky Power in June 1998 business.

The removal and replacement of communication equipment is expected to result in labor removal costs being incurred. Some salvage could be expected from the scrap sales of the equipment.

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KENTUCKY POWER COMPANY
 Depreciation Study as of December 31, 2008
 General Plant

Account	<u>398 MISCELLANEOUS EQUIPMENT</u>	
Depreciable Balance	\$974,320	
	<u>Current</u>	<u>Recommended</u>
Average Service Life (Yrs)	20	20
Iowa Curve	S5.0	S5.0
Gross Removal, %		0%
Gross Salvage, %		0%
Net Salvage %	0%	0%

 No life analysis was conducted for this account since retirements are base on age in accordance with FERC Accounting Release 15. This Accounting Release was adopted by Kentucky Power in June 1998 business.

No salvage or removal costs are seen for the investments in this account.

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KENTUCKY POWER COMPANY
DEPRECIATION STUDY AS OF 12-31-08
GENERAL PLANT WORKPAPERS

SALVAGE AND REMOVAL ANALYSIS

KENTUCKY POWER COMPANY
General Plant Gross Removal Test

21-Oct-09

Original Cost Retired by Plant Account

Year	390	391	392	393	394	395	396	397	398	Total	Removal %	Functional Gross Removal
1994	8,581	1,147	0	3,479	0	0	0	18,899	2,416	34,522	2%	804
1995	0	6,412	0	0	1,329	0	0	523	0	8,264	580%	47,957
1996	290,552	4,438	0	0	734	7,565	0	157,954	63,224	524,467	-13%	-70,222
1997	0	1,923	0	0	1,113	0	0	219,173	14,210	236,419	11%	27,111
1998	3,693	81,954	11,241	1,690	25,510	29,020	0	982,587	34,504	1,170,199	0%	524
1999	26,757	0	0	0	0	0	0	0	0	26,757	1%	393
2000	0	15,335	0	0	2,272	5,215	0	0	0	22,822	-155%	-35,438
2001	182,029	0	0	0	0	0	0	47,157	0	229,186	-98%	-223,628
2002	160,071	0	0	0	0	0	0	51,409	0	211,480	17%	35,368
2003	1,426,227	5,790	38,129	7,347	5,105	2,558	0	244,213	0	1,729,369	8%	138,350
2004	10,330,436	3,747	0	779	3,477	3,405	0	874,410	0	11,216,254	0%	0
2005	149,701	561,105	0	76,004	243,042	103,242	0	496,756	77,967	1,707,817	3%	49,533
2006	4,747	36,455	0	2,061	81,850	19,296	0	87,741	16,572	248,722	1%	2,951
2007	7,133	4,666	0	0	7,054	3,352	0	13,974	8,732	44,911	91%	40,915
2008	19,618	15,821	0	14,160	75,087	19,393	0	16,506	2,038	162,623	16%	25,536
TOTAL	12,609,545	738,793	49,370	105,520	446,573	193,046	0	3,211,302	219,663	17,573,812	0%	40,154

EVALUATION BASED ON 1994-2008 ACTUAL

	390	391	392	393	394	395	396	397	398	Total
Total Retmts	12,609,545	738,793	49,370	105,520	446,573	193,046	0	3,211,302	219,663	17,354,149
Gross Removal, %	0	0	0	0	0	0	0	2	0	0
Gross Removal \$	0	0	0	0	0	0	0	64,226	0	64,226

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21-Oct-09

KENTUCKY POWER COMPANY
 General Plant Gross Salvage Test

Year	Original Cost Retired by Plant Account										Total	Salvage %	Functional Gross Salvage
	390	391	392	393	394	395	396	397	398	399			
1994	8,581	1,147	0	3,479	0	0	0	18,899	2,416	0	34,522	108%	37,443
1995	0	6,412	0	0	1,329	0	0	523	0	0	8,264	134%	11,107
1996	290,552	4,438	0	0	734	7,565	0	157,954	63,224	0	524,467	1%	4,006
1997	0	1,923	0	0	1,113	0	0	219,173	14,210	0	236,419	29%	68,605
1998	3,693	81,954	11,241	1,690	25,510	29,020	0	982,587	34,504	0	1,170,199	0%	0
1999	26,757	0	0	0	0	0	0	0	0	0	26,757	-35%	-9,336
2000	0	15,335	0	0	2,272	5,215	0	47,157	0	0	22,822	0%	0
2001	182,029	0	0	0	0	0	0	51,409	0	0	229,186	0%	0
2002	160,071	0	0	0	0	0	0	244,213	0	0	211,480	113%	239,760
2003	1,426,227	5,790	38,129	7,347	5,105	2,558	0	874,410	0	0	1,729,369	-8%	-100,160
2004	10,330,436	3,747	0	779	3,477	3,405	0	496,756	77,967	0	11,216,254	9%	1,065,490
2005	149,701	561,105	0	76,004	243,042	103,242	0	87,741	16,572	0	1,707,817	14%	233,742
2006	4,747	36,455	0	2,061	81,850	19,256	0	13,974	8,732	0	248,722	0%	109,452
2007	7,133	4,666	0	0	7,054	3,352	0	16,506	2,038	0	44,911	244%	47,146
2008	19,618	15,821	0	14,160	75,087	19,393	0	0	0	0	162,623	29%	0
TOTAL	<u>12,609,545</u>	<u>738,793</u>	<u>49,370</u>	<u>105,520</u>	<u>446,573</u>	<u>193,046</u>	<u>0</u>	<u>3,211,302</u>	<u>219,663</u>	<u>0</u>	<u>17,573,812</u>	<u>10%</u>	<u>1,707,255</u>

EVALUATION BASED ON 1994-2008 ACTUAL

	390	391	392	393	394	395	396	397	398	Total
Total Reimts	12,609,545	738,793	49,370	105,520	446,573	193,046	0	3,211,302	219,663	17,354,149
Gross Salvage, %	11	0	0	5	5	5	0	10	0	10
Gross Salvage \$	1,387,050	0	0	5,276	22,329	9,652	0	321,130	0	1,745,437

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21-Oct-09

KENTUCKY POWER COMPANY
 General Plant Net Salvage Test

Original Cost Retired by Account

Year	390	391	392	393	394	395	396	397	398	Total	Salvage %	Functional Net Salvage
1994	8,681	1,147	0	3,479	0	0	0	18,699	2,416	34,522	106%	36,639
1995	0	6,412	0	0	1,329	0	0	523	0	8,264	-446%	-36,850
1996	290,552	4,438	0	0	734	7,565	0	157,954	63,224	524,467	14%	74,228
1997	0	1,923	0	0	1,113	0	0	219,173	14,210	236,419	18%	41,494
1998	3,693	81,954	11,241	1,690	25,510	29,020	0	982,587	34,504	1,170,199	0%	-524
1999	26,757	0	0	0	0	0	0	0	0	26,757	-36%	-9,729
2000	0	15,335	0	0	2,272	5,215	0	0	0	22,822	155%	35,438
2001	182,029	0	0	0	0	0	0	47,157	0	229,186	98%	223,628
2002	160,071	0	0	0	0	0	0	51,409	0	211,480	97%	204,392
2003	1,426,227	5,790	38,129	7,347	5,105	2,558	0	244,213	0	1,729,369	-14%	-238,510
2004	10,330,436	3,747	0	779	3,477	3,405	0	874,410	0	11,216,254	9%	1,065,490
2005	149,701	561,105	0	76,004	243,042	108,242	0	496,756	77,967	1,707,817	11%	184,209
2006	4,747	36,455	0	2,061	81,850	19,296	0	87,741	16,572	248,722	-1%	-2,951
2007	7,133	4,666	0	0	7,054	3,352	0	13,974	8,732	44,911	153%	68,537
2008	19,618	15,821	0	14,160	75,087	19,393	0	16,506	2,038	162,623	13%	21,610
TOTAL	<u>12,609,545</u>	<u>738,793</u>	<u>49,370</u>	<u>105,520</u>	<u>446,573</u>	<u>193,046</u>	<u>0</u>	<u>3,211,302</u>	<u>219,663</u>	<u>17,573,812</u>	<u>9%</u>	<u>1,667,101</u>

EVALUATION BASED ON 1994-2008 ACTUAL

	390	391	392	393	394	395	396	397	398	Total
Total Reimts	12,609,545	738,793	49,370	105,520	446,573	193,046	0	3,211,302	219,663	17,354,149
Net Salvage, %	11	0	0	5	5	5	0	8	0	10
Net Salvage \$	1,387,050	0	0	5,276	22,329	9,652	0	256,904	0	1,681,211

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KENTUCKY POWER COMPANY
DEPRECIATION STUDY AS OF 12-31-08
GENERAL PLANT WORKPAPERS

CALCULATED RESERVE

Depreciation Reserve Summary

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Account: KEPCo 101/6 389 Land Rights - KY
 Scenario: KEPCO GENERAL 2008
 Dispersion: 75 - R4

Age Net Salvage Rate: 0.00%
 Future Net Salvage Rate: 0.00%

Broad Group Procedure

January 1, 2009

	Plant Amt	Depreciation Reserve		Net Plant	
		Amount	Ratio	Amount	Ratio
Recorded	\$219,614.69	\$6,414.75	0.0292	\$213,199.94	0.9708
Computed	\$219,614.69	\$13,110.32	0.0597	\$206,504.37	0.9403
Difference		(\$6,695.57)	-0.0305	\$6,695.57	0.0305

Generation Arrangement Report

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Account: KEPCo 101/6 389 Land Rights - KY

Dispersion: 75.00 - R4

Average Net Salvage Rate: 0.00%

Future Net Salvage Rate: 0.00%

Broad Group Procedure

January 1, 2009

Vintage	Age	Surviving Plant	Avg Life	Remaining Life	Net Plant Ratio	Alloc Factor	Computed Net Plant	Accrual
2007	1.50	\$182,230.82	75.00	73.50	0.9800	1.0000	\$178,589.81	\$2,429.74
2003	5.50	\$9,137.87	75.00	69.51	0.9268	1.0000	\$8,468.64	\$121.84
1986	22.50	\$22,442.00	75.00	52.66	0.7021	1.0000	\$15,756.75	\$299.23
1985	23.50	\$1,227.00	75.00	51.68	0.6891	1.0000	\$845.50	\$16.36
1984	24.50	\$678.00	75.00	50.71	0.6761	1.0000	\$458.38	\$9.04
1979	29.50	\$3,899.00	75.00	45.88	0.6118	1.0000	\$2,385.28	\$51.99
		\$219,614.69	75.00	70.52	0.9403	1.0000	\$206,504.37	\$2,928.20

Depreciation Reserve Summary

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Account: KEPCo 101/6 390 - KY
 Scenario: KEPCO GENERAL 2008
 Dispersion: 28 - L3
 Current Net Salvage Rate: 11.00%
 Future Net Salvage Rate: 11.00%

Broad Group Procedure

January 1, 2009

	Plant Amt	Depreciation Reserve		Net Plant	
		Amount	Ratio	Amount	Ratio
Recorded	\$19,910,321.83	\$4,906,914.02	0.2465	\$12,813,272.41	0.6435
Computed	\$19,910,321.83	\$10,028,638.52	0.5037	\$7,691,547.91	0.3863
Difference		(\$5,121,724.50)	-0.2572	\$5,121,724.50	0.2572

Generation Arrangement Report

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Account: KEPCo 101/6 390 - KY
 Dispersion: 28.00 - L3
 Average Net Salvage Rate: 11.00%
 Future Net Salvage Rate: 11.00%

Broad Group Procedure
 January 1, 2009

Vintage	Age	Surviving Plant	Avg Life	Remaining Life	Net Plant Ratio	Alloc Factor	Computed Net Plant	Accrual
2008	0.50	\$38,561.62	28.00	27.50	0.8741	1.0000	\$33,706.99	\$1,226.71
2007	1.50	\$37,635.02	28.00	26.50	0.8423	1.0000	\$31,700.78	\$1,196.26
2006	2.50	\$446,601.36	28.00	25.50	0.8105	1.0000	\$361,986.35	\$14,195.54
2005	3.50	\$272,727.32	28.00	24.50	0.7788	1.0000	\$212,392.90	\$8,668.83
2004	4.50	\$143,885.60	28.00	23.51	0.7471	1.0000	\$107,502.40	\$4,573.51
2002	6.50	\$4,456.24	28.00	21.54	0.6846	1.0000	\$3,050.83	\$141.64
2001	7.50	\$11,474.83	28.00	20.57	0.6539	1.0000	\$7,503.72	\$364.74
2000	8.50	\$393,113.43	28.00	19.62	0.6237	1.0000	\$245,195.20	\$12,495.39
1998	10.50	\$75,664.00	28.00	17.77	0.5649	1.0000	\$42,741.60	\$2,405.03
1997	11.50	\$317,803.00	28.00	16.87	0.5364	1.0000	\$170,462.94	\$10,101.60
1996	12.50	\$1,112,926.44	28.00	16.00	0.5085	1.0000	\$565,931.59	\$35,375.16
1995	13.50	\$484,522.00	28.00	15.15	0.4815	1.0000	\$233,288.40	\$15,400.88
1994	14.50	\$29,461.00	28.00	14.33	0.4554	1.0000	\$13,416.30	\$936.44
1993	15.50	\$19,258.00	28.00	13.55	0.4306	1.0000	\$8,292.36	\$612.13
1992	16.50	\$159,014.00	28.00	12.81	0.4072	1.0000	\$64,755.14	\$5,054.37
1991	17.50	\$389,833.00	28.00	12.13	0.3855	1.0000	\$150,299.43	\$12,391.12
1990	18.50	\$11,957,452.45	28.00	11.51	0.3659	1.0000	\$4,375,574.95	\$380,076.17
1989	19.50	\$21,105.00	28.00	10.96	0.3482	1.0000	\$7,349.40	\$670.84
1988	20.50	\$2,929.00	28.00	10.47	0.3327	1.0000	\$974.48	\$93.10
1987	21.50	\$11,487.75	28.00	10.04	0.3191	1.0000	\$3,666.09	\$365.15
1986	22.50	\$12,571.00	28.00	9.67	0.3075	1.0000	\$3,865.79	\$399.58
1985	23.50	\$2,504.00	28.00	9.36	0.2976	1.0000	\$745.18	\$79.59
1983	25.50	\$12,063.00	28.00	8.87	0.2820	1.0000	\$3,401.90	\$383.43
1982	26.50	\$7,057.00	28.00	8.68	0.2758	1.0000	\$1,946.21	\$224.31
1981	27.50	\$3,730,029.77	28.00	8.50	0.2701	1.0000	\$1,007,537.03	\$118,561.66
1980	28.50	\$14,163.00	28.00	8.33	0.2648	1.0000	\$3,750.84	\$450.18
1979	29.50	\$15,014.00	28.00	8.16	0.2595	1.0000	\$3,896.26	\$477.23
1978	30.50	\$16,821.00	28.00	7.99	0.2541	1.0000	\$4,273.75	\$534.67
1977	31.50	\$1,414.00	28.00	7.81	0.2483	1.0000	\$351.12	\$44.95
1976	32.50	\$6,155.00	28.00	7.61	0.2420	1.0000	\$1,489.28	\$195.64
1975	33.50	\$12,975.00	28.00	7.40	0.2353	1.0000	\$3,052.43	\$412.42
1974	34.50	\$14,153.00	28.00	7.17	0.2280	1.0000	\$3,226.55	\$449.86
1973	35.50	\$4,096.00	28.00	6.93	0.2204	1.0000	\$902.75	\$130.19

Generation Arrangement Report

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Account: KEPCo 101/6 390 - KY

Dispersion: 28.00 - L3

Average Net Salvage Rate: 11.00%

Future Net Salvage Rate: 11.00%

Broad Group Procedure

January 1, 2009

Vintage	Age	Surviving Plant	Avg Life	Remaining Life	Net Plant Ratio	Alloc Factor	Computed Net Plant	Accrual
1970	38.50	\$2,206.00	28.00	6.17	0.1962	1.0000	\$432.74	\$70.12
1969	39.50	\$12,870.00	28.00	5.91	0.1878	1.0000	\$2,417.42	\$409.08
1968	40.50	\$34,056.00	28.00	5.65	0.1796	1.0000	\$6,117.77	\$1,082.49
1967	41.50	\$6,231.00	28.00	5.39	0.1714	1.0000	\$1,068.24	\$198.06
1966	42.50	\$1,664.00	28.00	5.14	0.1634	1.0000	\$271.94	\$52.89
1963	45.50	\$481.00	28.00	4.41	0.1402	1.0000	\$67.42	\$15.29
1962	46.50	\$793.00	28.00	4.17	0.1326	1.0000	\$105.16	\$25.21
1961	47.50	\$448.00	28.00	3.94	0.1253	1.0000	\$56.16	\$14.24
1960	48.50	\$15,245.00	28.00	3.71	0.1181	1.0000	\$1,800.02	\$484.57
1959	49.50	\$6,904.00	28.00	3.49	0.1111	1.0000	\$766.83	\$219.45
1958	50.50	\$525.00	28.00	3.27	0.1041	1.0000	\$54.63	\$16.69
1957	51.50	\$147.00	28.00	3.06	0.0973	1.0000	\$14.30	\$4.67
1953	55.50	\$595.00	28.00	2.24	0.0712	1.0000	\$35.95	\$16.05
1952	56.50	\$97.00	28.00	2.05	0.0650	1.0000	\$6.31	\$3.08
1950	58.50	\$304.00	28.00	1.66	0.0527	1.0000	\$16.02	\$9.66
1949	59.50	\$1,116.00	28.00	1.48	0.0470	1.0000	\$52.46	\$35.47
1948	60.50	\$536.00	28.00	1.29	0.0409	1.0000	\$21.93	\$17.04
1945	63.50	\$434.00	28.00	0.68	0.0215	1.0000	\$9.33	\$13.80
1944	64.50	\$322.00	28.00	0.23	0.0073	1.0000	\$2.35	\$10.24
1942	66.50	\$1,884.00	28.00	0.00	0.0000	0.0000	\$0.00	\$0.00
1941	67.50	\$117.00	28.00	0.00	0.0000	0.0000	\$0.00	\$0.00
1940	68.50	\$430.00	28.00	0.00	0.0000	0.0000	\$0.00	\$0.00
1939	69.50	\$342.00	28.00	0.00	0.0000	0.0000	\$0.00	\$0.00
1938	70.50	\$43,738.00	28.00	0.00	0.0000	0.0000	\$0.00	\$0.00
		\$19,910,321.83	28.00	12.15	0.3863	1.0000	\$7,691,547.91	\$631,385.42

Depreciation Reserve Summary

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Account: KEPCo 101/6 391 - KY
 Scenario: KEPCO GENERAL 2008
 Dispersion: 35 - SQ
 Average Net Salvage Rate: 0.00%
 Future Net Salvage Rate: 0.00%

Broad Group Procedure

January 1, 2009

	Plant Amt	Depreciation Reserve		Net Plant	
		Amount	Ratio	Amount	Ratio
Recorded	\$1,312,821.14	\$145,379.54	0.1107	\$1,167,441.60	0.8893
Computed	\$1,312,821.14	\$297,123.38	0.2263	\$1,015,697.76	0.7737
Difference		(\$151,743.84)	-0.1156	\$151,743.84	0.1156

Generation Arrangement Report

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Account: KEPCo 101/6 391 - KY
 Dispersion: 35.00 - SQ
 Average Net Salvage Rate: 0.00%
 Mature Net Salvage Rate: 0.00%

Broad Group Procedure
 January 1, 2009

Vintage	Age	Surviving Plant	Avg Life	Remaining Life	Net Plant Ratio	Alloc Factor	Computed Net Plant	Accrual
2008	0.50	\$3,650.88	35.00	34.50	0.9857	1.0000	\$3,598.72	\$104.31
2007	1.50	\$163,270.19	35.00	33.50	0.9571	1.0000	\$156,272.90	\$4,664.86
2005	3.50	\$26,368.25	35.00	31.50	0.9000	1.0000	\$23,731.43	\$753.38
2004	4.50	\$278,932.15	35.00	30.50	0.8714	1.0000	\$243,069.45	\$7,969.49
2002	6.50	\$379,083.62	35.00	28.50	0.8143	1.0000	\$308,682.38	\$10,830.96
2001	7.50	\$108,531.78	35.00	27.50	0.7857	1.0000	\$85,274.97	\$3,100.91
2000	8.50	\$4,468.27	35.00	26.50	0.7571	1.0000	\$3,383.12	\$127.66
1999	9.50	\$127,468.00	35.00	25.50	0.7286	1.0000	\$92,869.54	\$3,641.94
1998	10.50	\$54,995.00	35.00	24.50	0.7000	1.0000	\$38,496.50	\$1,571.29
1994	14.50	\$6,656.00	35.00	20.50	0.5857	1.0000	\$3,898.51	\$190.17
1986	22.50	\$141,643.00	35.00	12.50	0.3571	1.0000	\$50,586.79	\$4,046.94
1985	23.50	\$17,754.00	35.00	11.50	0.3286	1.0000	\$5,833.46	\$507.26
		\$1,312,821.14	35.00	27.08	0.7737	1.0000	\$1,015,697.76	\$37,509.18

Depreciation Reserve Summary

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Account: KEPCo 101/6 392 - KY
 Scenario: KEPCO GENERAL 2008
 Dispersion: 30 - SQ
 .age Net Salvage Rate: 0.00%
 Future Net Salvage Rate: 0.00%

Broad Group Procedure

January 1, 2009

	Plant Amt	Depreciation Reserve		Net Plant	
		Amount	Ratio	Amount	Ratio
Recorded	\$9,654.90	\$900.57	0.0933	\$8,754.33	0.9067
Computed	\$9,654.90	\$1,840.56	0.1906	\$7,814.34	0.8094
Difference		(\$939.99)	-0.0974	\$939.99	0.0974

Generation Arrangement Report

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Account: KEPCo 101/6 392 - KY
 Dispersion: 30.00 - SQ
 Average Net Salvage Rate: 0.00%
 Mature Net Salvage Rate: 0.00%

Broad Group Procedure

January 1, 2009

Vintage	Age	Surviving Plant	Avg Life	Remaining Life	Net Plant Ratio	Alloc Factor	Computed Net Plant	Accrual
2007	1.50	\$3,835.70	30.00	28.50	0.9500	1.0000	\$3,643.91	\$127.86
2000	8.50	\$5,819.20	30.00	21.50	0.7167	1.0000	\$4,170.43	\$193.97
		\$9,654.90	30.00	24.28	0.8094	1.0000	\$7,814.34	\$321.83

Depreciation Reserve Summary

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Account: KEPCo 101/6 393 - KY
 Scenario: KEPCO GENERAL 2008
 Dispersion: 30 - SQ
 Average Net Salvage Rate: 5.00%
 Future Net Salvage Rate: 5.00%

Broad Group Procedure

January 1, 2009

	Plant Amt	Depreciation Reserve		Net Plant	
		Amount	Ratio	Amount	Ratio
Recorded	\$142,851.30	\$16,184.25	0.1133	\$119,524.48	0.8367
Computed	\$142,851.30	\$33,077.00	0.2315	\$102,631.73	0.7185
Difference		(\$16,892.75)	-0.1183	\$16,892.75	0.1183

Generation Arrangement Report

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Account: KEPCo 101/6 393 - KY
 Dispersion: 30.00 - SQ
 Average Net Salvage Rate: 5.00%
 Future Net Salvage Rate: 5.00%

Broad Group Procedure
 January 1, 2009

Vintage	Age	Surviving Plant	Avg Life	Remaining Life	Net Plant Ratio	Alloc Factor	Computed Net Plant	Accrual
2008	0.50	\$35,994.81	30.00	29.50	0.9342	1.0000	\$33,625.15	\$1,139.84
2006	2.50	\$9,819.85	30.00	27.50	0.8708	1.0000	\$8,551.45	\$310.96
2004	4.50	\$39,480.64	30.00	25.50	0.8075	1.0000	\$31,880.62	\$1,250.22
1995	13.50	\$25,233.00	30.00	16.50	0.5225	1.0000	\$13,184.24	\$799.05
1994	14.50	\$27,200.00	30.00	15.50	0.4908	1.0000	\$13,350.67	\$861.33
1992	16.50	\$4,331.00	30.00	13.50	0.4275	1.0000	\$1,851.50	\$137.15
1986	22.50	\$792.00	30.00	7.50	0.2375	1.0000	\$188.10	\$25.08
		\$142,851.30	30.00	22.69	0.7185	1.0000	\$102,631.73	\$4,523.62

Depreciation Reserve Summary

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Account: KEPCo 101/6 394 - KY
 Scenario: KEPCO GENERAL 2008
 Dispersion: 30 - SQ
 Range Net Salvage Rate: 5.00%
 Future Net Salvage Rate: 5.00%

Broad Group Procedure

January 1, 2009

	Plant Amt	Depreciation Reserve		Net Plant	
		Amount	Ratio	Amount	Ratio
Recorded	\$2,579,395.57	\$259,151.36	0.1005	\$2,191,274.43	0.8495
Computed	\$2,579,395.57	\$529,647.62	0.2053	\$1,920,778.17	0.7447
Difference		(\$270,496.26)	-0.1049	\$270,496.26	0.1049

Generation Arrangement Report

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Account: KEPCo 101/6 394 - KY

Dispersion: 30.00 - SQ

Average Net Salvage Rate: 5.00%

Future Net Salvage Rate: 5.00%

Broad Group Procedure

January 1, 2009

Vintage	Age	Surviving Plant	Avg Life	Remaining Life	Net Plant Ratio	Alloc Factor	Computed Net Plant	Accrual
2008	0.50	\$624,981.66	30.00	29.50	0.9342	1.0000	\$583,837.03	\$19,791.09
2007	1.50	\$142,821.02	30.00	28.50	0.9025	1.0000	\$128,895.97	\$4,522.67
2006	2.50	\$30,324.75	30.00	27.50	0.8708	1.0000	\$26,407.80	\$960.28
2005	3.50	\$139,558.65	30.00	26.50	0.8392	1.0000	\$117,121.36	\$4,419.67
2004	4.50	\$401,347.62	30.00	25.50	0.8075	1.0000	\$324,088.20	\$12,709.34
2003	5.50	\$108,886.81	30.00	24.50	0.7758	1.0000	\$84,478.02	\$3,448.08
2002	6.50	\$8,900.52	30.00	23.50	0.7442	1.0000	\$6,623.47	\$281.85
2001	7.50	\$154,805.23	30.00	22.50	0.7125	1.0000	\$110,298.73	\$4,902.17
2000	8.50	\$209,912.86	30.00	21.50	0.6808	1.0000	\$142,915.67	\$6,647.24
1999	9.50	\$242,443.45	30.00	20.50	0.6492	1.0000	\$167,386.21	\$7,677.38
1998	10.50	\$135,419.00	30.00	19.50	0.6175	1.0000	\$83,621.23	\$4,288.27
1997	11.50	\$113,910.00	30.00	18.50	0.5858	1.0000	\$66,732.27	\$3,607.15
1996	12.50	\$26,579.00	30.00	17.50	0.5542	1.0000	\$14,729.20	\$841.67
1994	14.50	\$2,744.00	30.00	15.50	0.4908	1.0000	\$1,346.85	\$86.89
1992	16.50	\$21,422.00	30.00	13.50	0.4275	1.0000	\$9,157.91	\$678.36
1991	17.50	\$65,186.00	30.00	12.50	0.3958	1.0000	\$25,802.79	\$2,064.22
1990	18.50	\$23,112.00	30.00	11.50	0.3642	1.0000	\$8,416.62	\$731.88
1987	21.50	\$8,923.00	30.00	8.50	0.2692	1.0000	\$2,401.77	\$282.56
1986	22.50	\$69,679.00	30.00	7.50	0.2375	1.0000	\$16,548.76	\$2,206.50
1985	23.50	\$48,429.00	30.00	6.50	0.2058	1.0000	\$9,968.30	\$1,533.59
		\$2,579,395.57	30.00	23.52	0.7447	1.0000	\$1,920,778.17	\$81,680.86

Depreciation Reserve Summary

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Account: KEPCo 101/6 395 - KY
 Scenario: KEPCO GENERAL 2008
 Dispersion: 30 - SQ
 Average Net Salvage Rate: 5.00%
 Future Net Salvage Rate: 5.00%

Broad Group Procedure

January 1, 2009

	Plant Amt	Depreciation Reserve		Net Plant	
		Amount	Ratio	Amount	Ratio
Recorded	\$262,378.70	\$72,215.81	0.2752	\$177,043.96	0.6748
Computed	\$262,378.70	\$147,593.02	0.5625	\$101,666.75	0.3875
Difference		(\$75,377.21)	-0.2873	\$75,377.21	0.2873

Generation Arrangement Report

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Account: KEPCo 101/6 395 - KY
 Dispersion: 30.00 - SQ
 Average Net Salvage Rate: 5.00%
 Future Net Salvage Rate: 5.00%

Broad Group Procedure

January 1, 2009

Vintage	Age	Surviving Plant	Avg Life	Remaining Life	Net Plant Ratio	Alloc Factor	Computed Net Plant	Accrual
2005	3.50	\$1,833.80	30.00	26.50	0.8392	1.0000	\$1,538.86	\$58.07
2004	4.50	\$11,433.43	30.00	25.50	0.8075	1.0000	\$9,232.49	\$362.06
2002	6.50	\$7,357.47	30.00	23.50	0.7442	1.0000	\$5,475.18	\$232.99
1999	9.50	\$3,800.00	30.00	20.50	0.6492	1.0000	\$2,466.83	\$120.33
1998	10.50	\$9,244.00	30.00	19.50	0.6175	1.0000	\$5,708.17	\$292.73
1996	12.50	\$28,363.00	30.00	17.50	0.5542	1.0000	\$15,717.83	\$898.16
1992	16.50	\$23,978.00	30.00	13.50	0.4276	1.0000	\$10,250.59	\$759.30
1991	17.50	\$31,455.00	30.00	12.50	0.3958	1.0000	\$12,450.94	\$996.08
1990	18.50	\$24,300.00	30.00	11.50	0.3642	1.0000	\$8,849.25	\$769.50
1987	21.50	\$55,513.00	30.00	8.50	0.2692	1.0000	\$14,942.25	\$1,757.91
1986	22.50	\$51,612.00	30.00	7.50	0.2375	1.0000	\$12,257.85	\$1,634.38
1985	23.50	\$13,489.00	30.00	6.50	0.2058	1.0000	\$2,776.49	\$427.15
		\$262,378.70	30.00	12.24	0.3875	1.0000	\$101,666.74	\$8,308.66

Depreciation Reserve Summary

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Account: KEPCo 101/6 396 - KY
 Scenario: KEPCO GENERAL 2008
 Dispersion: 8 - SQ

Large Net Salvage Rate: 0.00%
 Future Net Salvage Rate: 0.00%

Broad Group Procedure

January 1, 2009

	Plant Amt	Depreciation Reserve		Net Plant	
		Amount	Ratio	Amount	Ratio
Recorded	\$5,931.29	\$2,357.97	0.3975	\$3,573.32	0.6025
Computed	\$5,931.29	\$4,819.17	0.8125	\$1,112.12	0.1875
Difference		(\$2,461.20)	-0.4150	\$2,461.20	0.4150

Generation Arrangement Report

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Account: KEPCo 101/6 396 - KY
 Dispersion: 8.00 - SQ
 Average Net Salvage Rate: 0.00%
 Future Net Salvage Rate: 0.00%

Broad Group Procedure
 January 1, 2009

Vintage	Age	Surviving Plant	Avg Life	Remaining Life	Net Plant Ratio	Alloc Factor	Computed Net Plant	Accrual
2002	6.50	\$5,931.29	8.00	1.50	0.1875	1.0000	\$1,112.12	\$741.41
		\$5,931.29	8.00	1.50	0.1875	1.0000	\$1,112.12	\$741.41

Depreciation Reserve Summary

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Account: KEPCo 101/6 397 - KY
 Scenario: KEPCO GENERAL 2008
 Dispersion: 22 - SQ
 Large Net Salvage Rate: 8.00%
 Future Net Salvage Rate: 8.00%

Broad Group Procedure

January 1, 2009

	Plant Amt	Depreciation Reserve		Net Plant	
		Amount	Ratio	Amount	Ratio
Recorded	\$6,755,007.87	\$1,042,002.19	0.1543	\$5,172,605.05	0.7657
Computed	\$6,755,007.87	\$2,129,620.22	0.3153	\$4,084,987.02	0.6047
Difference		(\$1,087,618.03)	-0.1610	\$1,087,618.03	0.1610

Generation Arrangement Report

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Account: KEPCo 101/6 397 - KY

Dispersion: 22.00 - SQ

Average Net Salvage Rate: 8.00%

Future Net Salvage Rate: 8.00%

Broad Group Procedure

January 1, 2009

Vintage	Age	Surviving Plant	Avg Life	Remaining Life	Net Plant Ratio	Alloc Factor	Computed Net Plant	Accrual
2008	0.50	\$1,305,400.97	22.00	21.50	0.8991	1.0000	\$1,173,674.14	\$54,589.50
2007	1.50	\$187,516.91	22.00	20.50	0.8573	1.0000	\$160,753.13	\$7,841.62
2006	2.50	\$818,515.02	22.00	19.50	0.8155	1.0000	\$667,461.79	\$34,228.81
2005	3.50	\$373,813.79	22.00	18.50	0.7736	1.0000	\$289,195.94	\$15,632.21
2004	4.50	\$505,781.69	22.00	17.50	0.7318	1.0000	\$370,140.24	\$21,150.87
2003	5.50	\$370,198.37	22.00	16.50	0.6900	1.0000	\$255,436.88	\$15,481.02
2002	6.50	\$54,039.58	22.00	15.50	0.6482	1.0000	\$35,027.47	\$2,259.84
2001	7.50	\$55,586.09	22.00	14.50	0.6064	1.0000	\$33,705.38	\$2,324.51
2000	8.50	\$152,600.66	22.00	13.50	0.5645	1.0000	\$86,150.01	\$6,381.48
1999	9.50	\$22,735.79	22.00	12.50	0.5227	1.0000	\$11,884.62	\$950.77
1998	10.50	\$1,604,245.00	22.00	11.50	0.4809	1.0000	\$771,496.00	\$67,086.61
1997	11.50	\$65,864.00	22.00	10.50	0.4391	1.0000	\$28,920.28	\$2,754.31
1996	12.50	\$82,417.00	22.00	9.50	0.3973	1.0000	\$32,742.03	\$3,446.53
1995	13.50	\$40,376.00	22.00	8.50	0.3555	1.0000	\$14,351.83	\$1,688.45
1994	14.50	\$69,705.00	22.00	7.50	0.3136	1.0000	\$21,862.02	\$2,914.94
1993	15.50	\$62,827.00	22.00	6.50	0.2718	1.0000	\$17,077.52	\$2,627.31
1992	16.50	\$89,029.00	22.00	5.50	0.2300	1.0000	\$20,476.67	\$3,723.03
1991	17.50	\$381,669.00	22.00	4.50	0.1882	1.0000	\$71,823.17	\$15,960.70
1990	18.50	\$43,721.00	22.00	3.50	0.1464	1.0000	\$6,399.16	\$1,828.33
1989	19.50	\$63,095.00	22.00	2.50	0.1045	1.0000	\$6,596.30	\$2,638.52
1988	20.50	\$106,507.00	22.00	1.50	0.0627	1.0000	\$6,680.89	\$4,453.93
1987	21.50	\$149,769.00	22.00	0.50	0.0209	1.0000	\$3,131.53	\$6,263.07
1986	22.50	\$73,742.00	22.00	0.00	0.0000	0.0000	\$0.00	\$0.00
1985	23.50	\$75,853.00	22.00	0.00	0.0000	0.0000	\$0.00	\$0.00
		\$6,755,007.87	22.00	14.46	0.6047	1.0000	\$4,084,987.02	\$276,226.36

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Depreciation Reserve Summary

Account: KEPCo 101/6 398 - KY
 Scenario: KEPCO GENERAL 2008
 Dispersion: 20 - SQ
 Average Net Salvage Rate: 0.00%
 Future Net Salvage Rate: 0.00%

Broad Group Procedure

January 1, 2009

	Plant Amt	Depreciation Reserve		Net Plant	
		Amount	Ratio	Amount	Ratio
Recorded	\$974,319.73	\$129,027.54	0.1324	\$845,292.19	0.8676
Computed	\$974,319.73	\$263,703.53	0.2707	\$710,616.20	0.7293
Difference		(\$134,675.99)	-0.1382	\$134,675.99	0.1382

Generation Arrangement Report

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Account: KEPCo 101/6 398 - KY

Dispersion: 20.00 - SQ

Average Net Salvage Rate: 0.00%

Future Net Salvage Rate: 0.00%

Broad Group Procedure

January 1, 2009

Vintage	Age	Surviving Plant	Avg Life	Remaining Life	Net Plant Ratio	Alloc Factor	Computed Net Plant	Accrual
2008	0.50	\$41,951.41	20.00	19.50	0.9750	1.0000	\$40,902.62	\$2,097.57
2007	1.50	\$169,092.56	20.00	18.50	0.9250	1.0000	\$156,410.62	\$8,454.63
2006	2.50	\$59,954.48	20.00	17.50	0.8750	1.0000	\$52,460.17	\$2,997.72
2005	3.50	\$30,390.25	20.00	16.50	0.8250	1.0000	\$25,071.96	\$1,519.51
2004	4.50	\$272,496.51	20.00	15.50	0.7750	1.0000	\$211,184.80	\$13,624.83
2002	6.50	\$305,030.32	20.00	13.50	0.6750	1.0000	\$205,895.47	\$15,251.52
2001	7.50	\$15,126.03	20.00	12.50	0.6250	1.0000	\$9,453.77	\$756.30
2000	8.50	\$13,951.17	20.00	11.50	0.5750	1.0000	\$8,021.92	\$697.56
1997	11.50	\$1,166.00	20.00	8.50	0.4250	1.0000	\$495.55	\$58.30
1993	15.50	\$1,822.00	20.00	4.50	0.2250	1.0000	\$409.95	\$91.10
1991	17.50	\$2,475.00	20.00	2.50	0.1250	1.0000	\$309.36	\$123.75
1988	20.50	\$4,764.00	20.00	0.00	0.0000	0.0000	\$0.00	\$0.00
1987	21.50	\$2,110.00	20.00	0.00	0.0000	0.0000	\$0.00	\$0.00
1986	22.50	\$49,620.00	20.00	0.00	0.0000	0.0000	\$0.00	\$0.00
1985	23.50	\$4,370.00	20.00	0.00	0.0000	0.0000	\$0.00	\$0.00
		\$974,319.73	20.00	14.59	0.7293	1.0000	\$710,616.20	\$45,672.79

Kentucky Power Company

REQUEST

Refer to Kentucky Power's response to the AG's Initial Data Request ("AG's First Request"), Item 16.

- a. Explain whether Kentucky Power or AEP has had prior experience with Alstom on any major projects.
- b. If the answer to part a. of this request is yes, describe the results from having used Alstom and provide the expectations for the proposed project.
- c. If the Alstom Novel Integrated Desulphurization technology had been used in Europe since 1995, explain whether this technology was a consideration in the 2004-2006 preliminary Scrubber analysis referenced in Exhibit LPM-1 of the Application.

RESPONSE

- a. Alstom was the provider of the flue gas desulfurization technology on AEP's 1300 MW Mountaineer Plant as well as an Original Equipment Manufacturer (OEM) partner on AEP's carbon capture and storage technology demonstration at the same facility. In addition, Alstom has in the past and continues to provide major turbine/generator components and associated professional services across the AEP fleet.
- b. Alstom's performance on the FGD project at Mountaineer was in full accord with the contractual requirements for cost and schedule and the FDG itself met all operational guarantees. In all cases across the varying services they provide AEP, Alstom has always addressed any warranty issues without hesitation. AEP and KPCo would expect nothing less of Alstom on the Big Sandy Unit 2 FGD project.
- c. In the early 1990's, Alstom began NID-related pilot scale laboratory R&D work in Sweden. In the mid 1990's, Alstom began marketing the technology in Europe and China to the iron and steel industries and to the waste energy industry as a dry scrubbing technology capable of 80-90% SO₂ capture. The first commercial scale NID unit was built in Poland in 1995.

During the 2004-05 timeframe, Alstom's first application of the technology in North America was marketed for Circulating Fluid Bed boilers as a "polishing" dry scrubbing technology and installed at the Spurlock and Seward Plants.

Following the experience gained on the Spurlock and Seward installations, Alstom began investigating the enhancement of the capability of the technology to achieve 95-98% SO₂ capture for application on boilers burning high sulfur fuels. In late 2008, Alstom made their first US commercial offering for a unit burning 4.5 lb SO₂/mmBTU, at 96% SO₂ removal.

As can be seen from this history of the technology development, Alstom was not in a position to offer the NID system in the US market during the 2004-2006 timeframe. Thus, it was not considered for application on Big Sandy Unit 2.

WITNESS: Robert L Walton

Kentucky Power Company

REQUEST

Refer to Kentucky Power's response to the AG's First Request, Item 22, Attachment 8.

- a. If AEP or Kentucky Power had purchased the Riverside Generating ("RG") natural gas plant in Zelda, Kentucky at the initial non-binding offer made on March 09, 2010, provide and describe the financial impact on Off-System Sales ("OSS"), pool capacity costs, and PJM capacity costs to:
 - (1) Kentucky Power as a member of the East Pool Agreement;
 - (2) The other members of the East Pool Agreement;
 - (3) The members of the contemplated three member pool; and
 - (4) The members of any other agreement between the AEP subsidiaries of the East Pool Agreement.
- b. Provide a further explanation of why AEP or Kentucky Power did not purchase the RG natural gas plant considering the capability of conversion to a 2x1 combined cycle ("CC") and 3x1 CC which would enhance the capacity of the facility.
- c. Prepare an analysis of the purchase of the RG natural gas plant as an option scenario and compare to Options 1 through 4, using the same modeling as used for those four options. Include revenues from OSS, pool capacity costs, PJM capacity costs, and the financial impact to the current East Pool Agreement and the proposed three member pool.
- d. Explain whether AEP or Kentucky Power considered including other utilities in a possible purchase/conversion of the RG natural gas plant as a way to offset the excess capacity and mitigate costs.

RESPONSE

- a. The Company has not conducted such a study.