RECEIVED

OCT 03 2014

PUBLIC SERVICE COMMISSION

COMMONWEALTH OF KENTUCKY

BEFORE THE

PUBLIC SERVICE COMMISSION OF KENTUCKY

IN THE MATTER OF

THE APPLICATION OF KENTUCKY POWER COMPANY	()		
FOR (1) THE GRANT OF A DEVIATION FROM THE)		
ASYMMETRICAL PRICING REQUIREMENTS OF)		
KRS 278.2207 TO APPALACHIAN POWER COMPANY)	CASE NO. 2014-00264	
TO APPALACHIAN POWER COMPANY BY KENTUCKY)		
POWER COMPANY OF TWO CONTRACTS FOR)		
DELIVERY OF COAL; AND (2) FOR ALL OTHER)		
REQUIRED APPROVALS AND RELIEF)		

KENTUCKY POWER COMPANY RESPONSE TO ATTORNEY GEN4ERAL'S INITIAL SET OF DATA REQUESTS

VERIFICATION

The undersigned, Charles F. West, being duly sworn, deposes and says he is the Manager, Fuel Emissions & Logistics, 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

	Charlest Mest
	Charles F. West
STATE OF OHIO) Case No. 2014-00264
COUNTY OF FRANKLIN) Case No. 2014-00204)

Subscribed and sworn to before me, a Notary Public in and before said County and State, by Charles F. West, this the 30 day of September 2014.

Notary Public

Gina L. Beyer Notary Public, State of Ohio My Commission Expires 07-01-2016

My Commission Expires:

KPSC Case No. 2014-00264 Attorney General's Initial Data Requests Dated September 19, 2014 Item No. 1 Page 1 of 1

Kentucky Power Company

REQUEST

Reference Application at page 1, paragraph 1, and at page 4, paragraphs 11-13, which Reference the sustained forced outage of the barge unloader at the Mitchell generating station, which "lasted approximately six weeks" and was the result of a broken head shaft. Please provide copies of the following:

- a. Any and all reports regarding the incident on April 30, 2014, that resulted in the head shaft on the unloader breaking;
- b. Any and all status reports issued during the following six-week period providing updates regarding the repair and/or replacement that corrected the forced outage; and
- c. The final estimated cost of repair to the barge unloader and/or any related appurtenances or equipment.

RESPONSE

- a & b. Please refer to Attachment 1 to this data request for reports regarding the barge unloader repair at the Mitchell Plant. Mitchell Plant staff promptly notified the coal procurement section by telephone of the barge unloader outage, which provided the coal buyers the opportunity to address barge deliveries that were already in transit and for the barge shipments expected over the duration of the outage. Mitchell Plant staff and the coal procurement staff communicated regularly by telephone throughout the outage.
- c. The final estimated cost of repair to the barge unloader is approximately \$400,000.

KPCo Case No. 2014-00264 Attorney General's First Set of Data Requests Dated September 19th, 2014 Item No. 1 Attachment 1 Page 1 of 31

Field Service Report Form QSF FS 801



Customer: AEP KRAMMER-MITCHELL	Date 5/8/14 Thurs.	Sheet No.	1
Location: STATE RT 2 CRESAP, WEST VIR	GINIA	Purchase Order No.:	NA
Equipment: CBU	Date: 5/8/14	Sheet No.	1
Service at Reg. Time: 8.0 hrs.	Comments: 6014-3 HP Charge# 103002		
Service at Over-Time: hrs.	Comments:		
Travel at Reg. Time: hrs.	Comments:		

- 1. Arrive site 07:45 crew safety meeting signing on.
- 2. Two men at job site starting to stage the site for work to start.
- 3. Spoke with Paul about the chain parts we need an answer before this weekend.
- Received the Head Shaft Assembly weight 17,500 more than the original drawing showed.
 - Check the new assembly it has the updated sprocket assemblies received from another plant The new design weighs 4000 # more. Spoke with Dave and he thinks the new sprocket assembly design is on the broken shaft.
- 5. Crew finished safety training just before lunch.
- The plans this afternoon is to continue removing the covers over the head shaft assembly.
- 7. Met with Dave on time for my safety meeting tomorrow. Left job site 16:25

Field Service Technician Sign	n-Off	Customer Sign-Off
FRANK FALCON CO	NSULTANT	

Last Viewed: 9/29/2014 2:42 PM	Revision: 0
Page: 1 of 1	Date: 10/10/10

KPCo Case No. 2014-00264 Attorney General's First Set of Data Requests Dated September 19th, 2014 Item No. 1 Attachment 1 Page 2 of 31

Field Service Report Form QSF FS 801



Customer: AEP KRAMMER-MITCHELL	Date 5/9/14 Fri.	Sheet No.	1
Location: STATE RT 2 CRESAP, WEST VIR	GINIA	Purchase Order No.:	NA
Equipment: CBU	Date: 5/9/14	Sheet No.	1
Service at Reg. Time: 8.0 hrs.	Comments: 6014-3 HP Charge# 103002		
Service at Over-Time: 6.0 hrs.	Comments:		
Travel at Reg. Time: hrs.	Comments:		

- 1. Arrive site 07:00
- 2. Attended safety training.
- 3. Crew is removing the cover from the head shaft area. Removed the bucket drive gearing top cover. Noted the head shaft drive gear is not parallel to the intermediate gear. Suspect the shaft is broken on the gear side of the bearing. After we secure the head shaft we will remove the pillow block top cover to inspect where the break is located.
- 4. Installing rigging to secure the head shaft. Plans are to remove bucket at the top section to expose the chain. Evaluation where the pad eyes for the ten ton air hoists need to be located lower than originally discussed. This boom was shorten by 8 feet due to higher water level than originally designed therefor the boom angle is less from horizontal. Contacted HP for design off support members to enable us to lower the return side buckets.
- AEP Structural reviewed the proposed solution and determined the lower connection was not satisfactory.
- 6. We need to look at the proposal in the morning to better evaluate.
- 7. Left job site 21:00

Field Service Technician Sign-Off	Customer Sign-Off
FRANK FALCON CONSULTANT	
Thattie Tabeon Concernin	

Last Viewed: 9/29/2014 2:42 PM	Revision: 0
Page: 1 of 1	Date: 10/10/10

KPCo Case No. 2014-00264 Attorney General's First Set of Data Requests Dated September 19th, 2014 Item No. 1 Attachment 1 Page 3 of 31

Field Service Report Form QSF FS 801



Customer: AEP KRAMMER-MITCHELL	Date 5/10/14 Sat.	Sheet No.	1
Location: STATE RT 2 CRESAP, WEST VIR	RGINIA	Purchase Order No.:	NA
Equipment: CBU	Date: 5/10/14	Sheet No.	1
Service at Reg. Time: hrs.	Comments: 6014-3 HP Charge# 103002		
Service at Over-Time: 8.0 hrs.	Comments:		
Travel at Reg. Time: hrs.	Comments: Weather spotty rain		

- Determined the structure which was proposed would not work. The 2 horizontal WF12x53
 will slip between the back side of the chute and the gathering conveyor support column.
 Call Dave Riggs was advised he would contact Robin Synder and we would work on a
 solution.
- Determined we could add members from the boom center pin support plates to support the 2 WF12x53. Cut a section from the back of the chute to allow the WF's to fit. After measurements were make it was determined the distance between the WF's at 4 foot.
- Called Robin he would start working on the solution and call me back with the preliminary Drawings. Was not able to connect to the internet notified Robin I would go to the hotel for better service.
- 4. 11:30 received the preliminary and Robin and I talked out the issues of cutting out the back of the chute to the chute vertical supports 5 x5WF@16#. He said he would work out all the connection this afternoon and email the drawings later.
- 5. Returned to site crew is in the process of cutting out the back of the chute, supporting the head shaft to remove the bearing cap.
- 6. Notified Pat and Will I would be at the hotel waiting for a call from Robin.
- 7. 16:30 Received call from Robin on completion of the drawing and Emailed them. Reviewed the drawing by telecom. Will see Dave early tomorrow on material needed.

Field Service Technician Sign-Off FRANK FALCON CONSULTANT	Customer Sign-Off

Last Viewed: 9/29/2014 2:43 PM	Revision: 0	
Page: 1 of 1	Date: 10/10/10	

KPCo Case No. 2014-00264 Attorney General's First Set of Data Requests Dated September 19th, 2014 Item No. 1 Attachment 1 Page 4 of 31

Field Service Report Form QSF FS 801



Customer: AEP KRAMMER-MITCHELL	Date 5/11/14 Sun.	Sheet No.	1
Location: STATE RT 2 CRESAP, WEST VIR	GINIA	Purchase Order No.:	NA
Equipment: CBU	Date: 5/11/14	Sheet No.	1
Service at Reg. Time: 4.0 hrs. Standby	Comments: 6014-3 HP Charge# 103002		
Service at Over-Time: 4.0 hrs.	Comments:		
Travel at Reg. Time: hrs.	Comments: Weather spotty rain		

- Arrived site 6:55 met with Will to inform him the drawing would be provided. Checked the 12WF on the work bench for length. The back of the chute was not cut out as I expected due to rain after 16:00. Still have problems on removal of the pins for the buckets.
- 2. The head shaft is supported and the bearing cap is to be removed early.
- Received the Drawings for the supports from Dave Riggs provide them to Pat for work on the beams.
- 4. Check the area of the break on the head shaft. The break runs diagonal under the bearing. We will not be able to rotate the head shaft to remove the buckets. We have the head shaft secured and will remove the buckets at the head end.
- 5. Crew removed a section of the chute to allow the support beams to be installed.
- 6. Left the job site 11:20 on call.

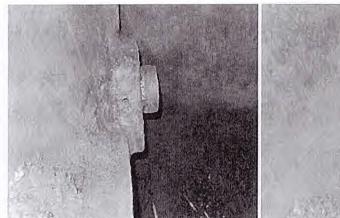
Field Service Technician Sign-Off	Customer Sign-Off
FRANK FALCON CONSULTANT	

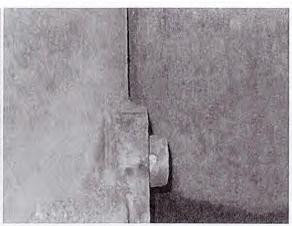
Last Viewed: 9/29/2014 2:43 PM	Revision: 0
Page: 1 of 1	Date: 10/10/10

Customer: AEP KRAMMER-MITCHELL	Date 5/12/14 Mon.	Sheet No.	1
Location: STATE RT 2 CRESAP, WEST VIRGINIA		Purchase Order No.:	NA
Equipment: CBU	Date: 5/12/14	Sheet No.	1
Service at Reg. Time: 8.0 hrs.	Comments: 6014-3	HP Charge# 103002	
Service at Over-Time: 1.5 hrs.	Comments:		
Travel at Reg. Time: hrs.	Comments: heavy rai	in until 10:00 rain shower	17:30

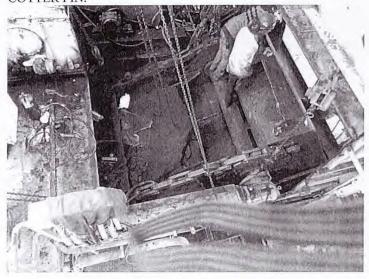
- Arrived site 6:55 meeting with Will on progress of removing the buckets. One bucket is removed and the other is ready one (1) of the connecting links to the bucket had to be cut. The structural crew has install the upper 12WF and has the second WF ready for installation. Heavy rain.
- 2. We have all the steel necessary for the rigging.
- AEP does not have any Jeffery chain. Call HP to contact Brandon Shores who has a replacement chain in stock.
- 4. Reviewed the bucket pins which were originally installed on contract 6014 Drawing 6014-3-0202. The pin which is installed on the buckets is not the same. Asked Paul Deynman to review the contact and see when the pins were changed to the new style. Photo show the inside of the pin is smooth with set screw and keeper pin whereas drawing 0202 show the inside section of the pin is threaded.
- 5. This machine has set for a long time and we can't evaluate the overall condition of the chain. We do know all connection have to be burnt out to remove the buckets. We have to remove 3 buckets and we should have 6 sets of chains 3 right and 3 left each set is four (4) long and has all the connecting pins and bars necessary to replace the section were the buckets were removed.
- 6. There is 2 buckets in the yard which we will use. The other spare 2 buckets need to go back to the shop and be sandblasted and have the pin area cleaned.
- 7. I would highly recommend a complete new chain be purchased for the outage next year and the chain be replaced. Maintenance should ask for another 2 buckets, which would place 6 in stock. Each year replace 6 buckets and have the buckets repaired. The unloader has a total of 32 buckets.
- 8. Left job site 06:30 the machinist have the 3rd bucket broke loose were in the process of staging it on the upper level. Structural plans to complete the rigging tomorrow afternoon. Informed the crew we would be moving the maintenance barge in place in the morning.
- 9. Left site 2 hours to get my cell phone repaired.

KPCo Case No. 2014-00264 Attorney General's First Set of Data Requests Dated September 19th, 2014 Item No. 1 Attachment 1 Page 6 of 31





BUCKET CONNECTION PIN PHOTO INSIDE THE BUCKET NOTE THE SET SCREW AND COTTER PIN.



CREW REMOVING A BUCKET PLEASE NOTE THE DETERIORATED TOP PLATE.

Field Service Technician Sign-Off FRANK FALCON CONSULTANT

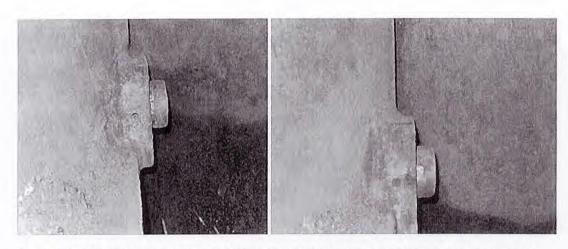
Customer Sign-Off

KPCo Case No. 2014-00264 Attorney General's First Set of Data Requests Dated September 19th, 2014 Item No. 1 Attachment 1 Page 7 of 31

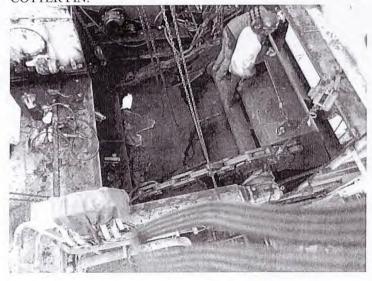
Customer: AEP KRAMMER-MITCHELL	Date 5/13/14 Tue.	Sheet No.	1
Location: STATE RT 2 CRESAP, WEST VIRGINIA		Purchase Order No.:	NA
Equipment: CBU	Date: 5/13/14	Sheet No.	1
Service at Reg. Time: 8.0 hrs.	Comments: 6014-3	HP Charge# 103002	
Service at Over-Time: 6.5 hrs.	Comments:		
Travel at Reg. Time: hrs.	Comments: slightly cl	oudy great day.	

- 1. Arrived site 6:55
- 2. Checked progress of installation of installing the rigging structure. Estimate time to set up to move the coal barge and move the maintenance work barge under the CBU.
- 3. Barge crane arrived. Was informed the crane may not be used.
- 4. 15:00 the main section of the rigging structure is installed to enable the trolley to be moved. The vertical box beams still need to be installed.
- 5. Encountered electrical issue on moving the trolley. Corrected approx.. 19:00
- 6. Completed moving and setting the maintenance barge under the CBU 21:25.
- 7. Left facility 21:28

KPCo Case No. 2014-00264 Attorney General's First Set of Data Requests Dated September 19th, 2014 Item No. 1 Attachment 1 Page 8 of 31



BUCKET CONNECTION PIN PHOTO INSIDE THE BUCKET NOTE THE SET SCREW AND COTTER PIN.



CREW REMOVING A BUCKET PLEASE NOTE THE DETERIORATED TOP PLATE.

KPCo Case No. 2014-00264 Attorney General's First Set of Data Requests Dated September 19th, 2014 Item No. 1 Attachment 1 Page 9 of 31

Field Service Report Form QSF FS 801

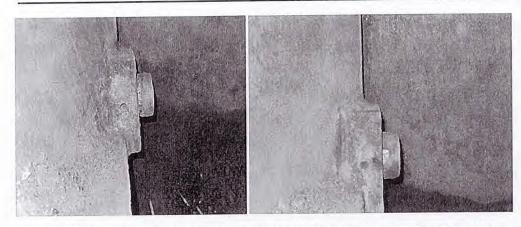


Customer: AEP KRAMMER-MITCHELL	Date 5/14/14 Wed.	Sheet No.	1
Location: STATE RT 2 CRESAP, WEST VIRGINIA		Purchase Order No.:	NA
Equipment: CBU	Date: 5/14/14	Sheet No.	1
Service at Reg. Time: 8.0 hrs.	Comments: 6014-3	HP Charge# 103002	
Service at Over-Time: 2.5 hrs.	Comments:		
Travel at Reg. Time: hrs.	Comments: cloudy sh	nowers	

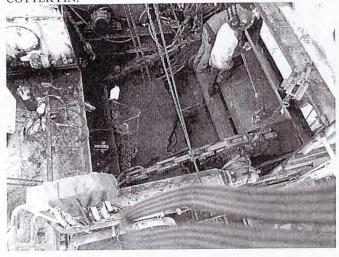
- 1. Arrived site 6:50
- 2. Installing the 10 ton chain falls to secure the top side chain.
- Welding the vertical pad eye tubing to the 12WF's. Check the line to make the connection
 to the bottom chains. The original concept was to grab the chain on the inside of the
 sprockets, but we have a bucket in the way. We will move the vertical pad eye posts to
 the outside of the sprockets.
- 4. HP is still working on acquiring new section of chains. Received word from Brandon Shores they will be changing their chain during the June outage. Jeffery delivery of this type of chain is 6 to 8 weeks. During the removal of the buckets we had to cut a bucket link to the chain. Should we not be able to acquire chain we will have to use the old chain and run without one bucket.
- 5. Dry tested the floating crane to ensure it would reach the head shaft area. Test was successful with the crane at the location against the work barge.
- 6. Welding should be complete for the rigging tomorrow morning.
- 7. Millwright are removing the bucket pins from the buckets and working on removing the attachment bolts which had to be cut from the chain.
- 8. Left job site 17:30

Field Service Report Form QSF FS 801





BUCKET CONNECTION PIN PHOTO INSIDE THE BUCKET NOTE THE SET SCREW AND COTTER PIN



CREW REMOVING A BUCKET PLEASE NOTE THE DETERIORATED TOP PLATE.

Field Service Technician Sign-Off
FRANK FALCON CONSULTANT

Customer Sign-Off

Last Viewed: 9/29/2014 2:44 PM Revision: 0
Page: 2 of 2 Date: 10/10/10

KPCo Case No. 2014-00264 Attorney General's First Set of Data Requests Dated September 19th, 2014 Item No. 1 Attachment 1 Page 11 of 31

Customer: AEP KRAMMER-MITCHELL	Date 5/15/14 Thu.	Sheet No.	1
Location: STATE RT 2 CRESAP, WEST VIRGINIA		Purchase Order No.:	NA
Equipment: CBU	Date: 5/15/14	Sheet No.	1
Service at Reg. Time: 1.0 hrs.	Comments: 6014-3 HP Charge# 103002		
Service at Over-Time: hrs.	Comments:		
Travel at Reg. Time: hrs.	Comments: drizzle a	nd heavy rain	

- 1. Arrived site 6:50 met with Dave Riggs expect heavy rains today. No work on the CBU
- 2. Advised Dave I would be at the hotel working on a report for Brandon Shores if he needed me give me a call. Normally we charge for standby, but being I will be working on another project I would only charge for 1 hr.
- 3. Left site 07:45

KPCo Case No. 2014-00264 Attorney General's First Set of Data Requests Dated September 19th, 2014 Item No. 1 Attachment 1 Page 12 of 31

Field Service Report Form QSF FS 801



Customer: AEP KRAMMER-MITCHELL	Date 5/16/14 Fri	Sheet No.	1
Location: STATE RT 2 CRESAP, WEST VIR	GINIA	Purchase Order No.:	NA
Equipment: CBU	Date: 5/16/14	Sheet No.	1
Service at Reg. Time: 8.0 hrs.	Comments: 6014-3	HP Charge# 103002	
Service at Over-Time: 3.5 hrs.	Comments:		
Travel at Reg. Time: hrs.	Comments: partly cloudy		

Report Details:

- 1. Arrived site 6:50 informed the floating crane will not be used.
- 2. Continue work on welding the rigging structural members.
- Plans are to continue work on lowering the bottom side buckets on the barge and start the steel work on the bottom side of the boom where cover and slide plate will be replaced.
- 4. Plans for replacement of the head shaft later when the crane issue is resolved.
- 5. Installed the outboard air 10 ton chain fall.
- 6. Ordered chain connecting pins 3 week delivery.
- 7. Water level 26 feet.
- 8. Work continuing on welding the inboard vertical tube. We had to cut an opening in the side of the chute to enable the side welds for the pad eye brackets.
- 9. Advised Will and Pat I would be on call left job site 18:30.

Field Service Technician	Sign-Off	Customer Sign-Off
FRANK FALCON	CONSULTANT	

Last Viewed: 9/29/2014 2:44 PM Revision: 0
Page: 1 of 1 Date: 10/10/10

KPCo Case No. 2014-00264 Attorney General's First Set of Data Requests Dated September 19th, 2014 Item No. 1 Attachment 1 Page 13 of 31

Field Service Report Form QSF FS 801



Customer: AEP KRAMMER-MITCHELL	Date 5/17/14 Sat.	Sheet No.	1
Location: STATE RT 2 CRESAP, WEST VIR	GINIA	Purchase Order No.:	NA
Equipment: CBU	Date: 5/17/14	Sheet No.	1
Service at Reg. Time: hrs.	Comments: 6014-3	HP Charge# 103002	
Service at Over-Time: 8.0 hrs.	Comments:		
Travel at Reg. Time: hrs.	Comments: partly clo	oudy, small shower 11:30	

- Arrived site 6:45 advised Will the boom had to be raised last night due to high water.
 Water level 627 feet this morning. Welders are still welding on the inboard chain fall pad
 eye. Plan to leave the boom at the present elevation until we are ready to lower the
 buckets.
- 2. 13:00 completed installing the rigging to lower the bottom side buckets. Removed the connection pins.
- 3. Lowered the boom to have a better angle to lower the buckets. Completed lowering the buckets at 15:15.
- 4. Left job site 15:45 crew will clean the lower side of the boom to check the condition of the 5/16 plate on Monday morning. No work on Sunday.

Field Service Technician Sign-Off	Customer Sign-Off	
FRANK FALCON CONSULTANT		

Last Viewed: 9/29/2014 2:50 PM	Revision: 0
Page: 1 of 1	Date: 10/10/10

KPCo Case No. 2014-00264 Attorney General's First Set of Data Requests Dated September 19th, 2014 Item No. 1 Attachment 1 Page 14 of 31

Field Service Report Form QSF FS 801



Customer: AEP KRAMMER-MITCHELL	Date 5/18/14 Sun.	Sheet No.	1
Location: STATE RT 2 CRESAP, WEST VIRGINIA		Purchase Order No.:	NA
Equipment: CBU	Date: 5/18/14	Sheet No.	1
Service at Reg. Time: 8.0 hrs. (STANDBY)	Comments: 6014-3	HP Charge# 103002	
Service at Over-Time: hrs.	Comments:		
Travel at Reg. Time: hrs.	Comments: partly clo	udy, small shower 11:30	

Report Details: 1. Standby day.	

Field Service Technician Sign-Off FRANK FALCON CONSULTANT	Customer Sign-Off	

 Last Viewed: 9/29/2014 2:50 PM
 Revision: 0

 Page: 1 of 1
 Date: 10/10/10

KPCo Case No. 2014-00264 Attorney General's First Set of Data Requests Dated September 19th, 2014 Item No. 1 Attachment 1 Page 15 of 31

Field Service Report Form QSF FS 801



Customer: AEP KRAMMER-MITCHELL	Date 5/19/14 Mon.	Sheet No.	1
Location: STATE RT 2 CRESAP, WEST VIR	GINIA	Purchase Order No.:	NA
Equipment: CBU	Date: 5/19/14	Sheet No.	1
Service at Reg. Time: 8.0 hrs.	Comments: 6014-3	HP Charge# 103002	
Service at Over-Time: hrs.	Comments:		
Travel at Reg. Time: hrs.	Comments:		

- 1. Removing the slide bars.
- Located all the head end steel for the upper section of the boom which was order from HP.
- 3. The return side section has a section of 5/16 plate missing. The exit end on the return section is missing the rolled section which the wear bars attach.
- 4. Ordered sections of 5/16 and 1/4 inch plate.
- 5. HP emailed me late Dryfess Grain is not willing to release and drive chain. Paul is still calling other facility's on getting drive chain. We must be careful on removing the bucket attachment 1 ¾ dia. Bolts from the chain. Recommendation apply rust buster for the next week prior to attempting to remove the bolts.
- 6. Left job site 15:45. Plan to return May 27 on site 07:00

Field Service Technician Signature	an-Off	Customer Sign-Off	
	ONSULTANT	1 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2	

Last Viewed: 9/29/2014 2:54 PM	Revision: 0
Page: 1 of 1	Date: 10/10/10

KPCo Case No. 2014-00264 Attorney General's First Set of Data Requests Dated September 19th, 2014 Item No. 1 Attachment 1 Page 16 of 31

Field Service Report Form QSF FS 801



Customer: AEP KRAMMER-MITCHELL	Date 5/26/14 Mon.	Report No.	15
Location: STATE RT 2 CRESAP, WEST VIR	GINIA	Purchase Order No.:	NA
Equipment: CBU	Date: 5/26/14	Sheet No.	1
Service at Reg. Time: hrs.	Comments: 6014-3	HP Charge# 103002	
Service at Over-Time: hrs.	Comments:		
Travel at Reg. Time: 8.0 hrs.	Comments: travel		

Report Details:		
Left home Smithfield,	, VA 09:03 arrived hotel Moundsville WV 17:14	ļ

Field Service Technician	n Sign-Off	Customer Sign-Off	
FRANK FALCON	CONSULTANT		

Last Viewed: 9/29/2014 2:55 PM	Revision: 0	
Page: 1 of 1	Date: 10/10/10	

KPCo Case No. 2014-00264 Attorney General's First Set of Data Requests Dated September 19th, 2014 Item No. 1 Attachment 1 Page 17 of 31

Field Service Report Form QSF FS 801



Customer: AEP KRAMMER-MITCHELL	Date 5/27/14 Tue.	Report No.	16
Location: STATE RT 2 CRESAP, WEST VIR	RGINIA	Purchase Order No.:	NA
Equipment: CBU	Date: 5/27/14	Sheet No.	1
Service at Reg. Time: 8.0 hrs.	Comments: 6014-3	HP Charge# 103002	
Service at Over-Time: 4.5 hrs.	Comments:		
Travel at Reg. Time: hrs.	Comments: weather	cloudy thunderstorms duri	ng the afternoon

Report Details:

Arrive site 06:50

- 1. Crane is on site. Crew is making preparations to remove the intermediate shaft and head shaft today.
- 2. Work continues on the bucket discharge chute head end. The slide rails are installed and repairs to the bottom section on the chute are made.
- 3. Lowered the CBU boom to the lowest position to make the opening to remove the head shaft possible.
- 4. 13:00 crane is set up. Removed the intermediate shaft. Move the bucket which were removed previously from the top section of the CBU to the work barge.
- 5. 18:00 installed the rigging to remove the head shaft minus the drive gear. Completed removing the sprocket shaft 19:00.
- 6. Completed removing the head shaft final gear 20:35. The shaft is broken under the bearing between the drive gear and the first sprocket.
- 7. Dave informed us the facility who last had the air drive to drive the buckets thru the drive gear box has not been located.
- 8. Left site 20:45

Field Service Technician Sign-Off FRANK FALCON CONSULTANT	Customer Sign-Off

Last Viewed: 9/29/2014 2:55 PM	Revision: 0
Page: 1 of 1	Date: 10/10/10

KPCo Case No. 2014-00264 Attorney General's First Set of Data Requests Dated September 19th, 2014 Item No. 1 Attachment 1 Page 18 of 31

Field Service Report Form QSF FS 801



Customer: AEP KRAMMER-MITCHELL	Date 5/28/14 Wed.	Report No.	17
Location: STATE RT 2 CRESAP, WEST VIRGINIA		Purchase Order No.:	NA
Equipment: CBU	Date: 5/28/14	Sheet No.	1
Service at Reg. Time: 8.0 hrs.	Comments: 6014-3	HP Charge# 103002	
Service at Over-Time: hrs.	Comments:		
Travel at Reg. Time: hrs.	Comments: weather clear possible thunderstorms		

Report Details:

Arrive site 07:00

- 1. Crew cleaning the gear casing, pillow block foundations, and intermediate gear. Installing support members on the top side runway at the head shaft area.
- 2. Thunderstorms in the area. 13:00 rain started with thunderstorms.
- 15:30 sill held up by the storms Contractor called it a day due to continuing storms to our west.
- Left job site 15:40 we still need to fabricate shims, which are deteriorated. And continue cleaning prior to setting the head shaft.

Field Service Technician Sign-Off FRANK FALCON CONSULTANT	Customer Sign-Off

 Last Viewed: 9/29/2014 2:56 PM
 Revision: 0

 Page: 1 of 1
 Date: 10/10/10

KPCo Case No. 2014-00264 Attorney General's First Set of Data Requests Dated September 19th, 2014 Item No. 1 Attachment 1 Page 19 of 31

Field Service Report Form QSF FS 801



Customer: AEP KRAMMER-MITCHELL	Date 5/29/14 Thu.	Report No.	18
Location: STATE RT 2 CRESAP, WEST VIRGINIA		Purchase Order No.:	NA
Equipment: CBU	Date: 5/29/14	Sheet No.	1
Service at Reg. Time: 8.0 hrs.	Comments: 6014-3 HP Charge# 103002		
Service at Over-Time: 5.0 hrs.	Comments:		
Travel at Reg. Time: hrs.	Comments: weather clear possible thunderstorms		

Report Details:

Arrive site 06:50

- Crew continuing cleaning the gear casing, pillow block foundations, and intermediate gear.
- 2. Moved the new head shaft to area closer to the barge unloader. The fixed bearing is very tight and takes two men to rotate. Loosen the bearing cap and noted the bearing would rotate freely. Removed the cap completely to check the fixed rings and seals. Had to install .014 shim between the bearing half's to free the bearing.
- 3. Thunderstorm after lunch had to wait them out.
- Started setting the head shaft 16:30 completed setting both the head shaft and intermediate 20:05
- 5. Left site 20:15

Field Service Technician Sign-Off	Customer Sign-Off
FRANK FALCON CONSULTANT	

Last Viewed: 9/29/2014 2:57 PM	Revision: 0
Page: 1 of 1	Date: 10/10/10

KPCo Case No. 2014-00264 Attorney General's First Set of Data Requests Dated September 19th, 2014 Item No. 1 Attachment 1 Page 20 of 31

Field Service Report Form QSF FS 801



Customer: AEP KRAMMER-MITCHELL	Date 5/30/14 Fri.	Report No.	19
Location: STATE RT 2 CRESAP, WEST VIF	RGINIA	Purchase Order No.:	NA
Equipment: CBU	Date: 5/30/14	Sheet No.	1
Service at Reg. Time: 8.0 hrs.	Comments: 6014-3 HP Charge# 103002		
Service at Over-Time: 3.0 hrs.	Comments:		
Travel at Reg. Time: hrs.	Comments: weather clear possible thunderstorms		

Report Details:

Arrive site 07:05

- 1. Morning meeting with the Contractor work will not commence until the job site is cleaned up and safety items are clear.
- 2. Checked the tail shaft for level (.240 inches) down on the river side. This is acceptable.
- 13:00 Checked the head shaft setting on the chock blocks is out of level approx. 3/8
 inches. We also have soft foot on both of the floating bearing. We need to remove the
 chock block to allow movement of the head shaft due to bearing bolts being body
 bound.
- 4. Structural crew working on the top runway section of the boom.
- 5. Left the job site 18:30 advised the crew to give me an update before they left.
- 6. Will called 20:45 to report work progressed well on the head shaft also advised me we will need a new shaft seal for the gear case. The seal is torn. I will call HP first thing Monday morning for the type and # of the seal I do not have a drawing for the gear case.

Field Service Technician Sign-Off FRANK FALCON CONSULTANT	Customer Sign-Off

Last Viewed: 9/29/2014 2:57 PM	Revision: 0
Page: 1 of 1	Date: 10/10/10

KPCo Case No. 2014-00264 Attorney General's First Set of Data Requests Dated September 19th, 2014 Item No. 1 Attachment 1 Page 21 of 31

Field Service Report Form QSF FS 801



Customer: AEP KRAMMER-MITCHELL	Date 5/31/14 Sat.	Report No.	20
Location: STATE RT 2 CRESAP, WEST VIRGINIA		Purchase Order No.:	NA
Equipment: CBU	Date: 5/31/14	Sheet No.	1
Service at Reg. Time: hrs.	Comments: 6014-3 HP Charge# 103002		
Service at Over-Time: 10.0 hrs.	Comments:		
Travel at Reg. Time: hrs.	Comments: weather clear possible thunderstorms		

Report Details:

Arrive site 07:00

- 1. Work continuing on the alignment and installation of the structural steel.
- Work still progressing on the bucket discharge section of the boom where the steel was missing.
- 3. Installing the air drive for the bucket drive system.
- 4. The garlock seals for the 10 inch drive shaft are torn. Contacted HP to email me the drawing for the gear case which will have the Garlock seal #.
- 5. Reviewed the final reading for the alignment of the drive gearing. Alignment was very difficult for we found the fixed bearing foundation is slightly tilted which we had to install a step shim. We finally had to set the two floating bearing for proper elevation and proper backlash for the pinion, intermediate, and drive gear and determine the amount of shim to install on the fixed bearing. The pinion has wear due to bad alignment prior we finally settled to the best reading of .005 side to side best fit. This is acceptable for a used pinion and will provide acceptable pitch contact between the gears.
- Informed Dave on the progress notified crew I would be at the hotel should and question should arise left site 17:05
- No work tomorrow plans for Monday is to start preparation of pulling the buckets back on the boom. Dave informed me the crew will vaccum out the buckets to removal any extra weight.

Field Service Technician Sign-Off FRANK FALCON CONSULTANT	Customer Sign-Off

Last Viewed: 9/29/2014 2:57 PM	Revision: 0
Page: 1 of 1	Date: 10/10/10

KPCo Case No. 2014-00264 Attorney General's First Set of Data Requests Dated September 19th, 2014 Item No. 1 Attachment 1 Page 22 of 31

Field Service Report Form QSF FS 801



Customer: AEP KRAMMER-MITCHELL	Date 6/1/14 Sun.	Report No.	21
Location: STATE RT 2 CRESAP, WEST VIRO	GINIA	Purchase Order No.:	NA
Equipment: CBU	Date: 6/1/14	Sheet No.	1
Service at Reg. Time: 8.0 hrs. (standby)	Comments: 6014-3	HP Charge# 103002	
Service at Over-Time: hrs.	Comments:		
Travel at Reg. Time: hrs.	Comments: weather clear possible thunderstorms		

Report Details: Stan	dby			

Field Service Technician Sign-Off		Customer Sign-Off	
FRANK FALCON CONSULT	TANT		

 Last Viewed: 9/29/2014 2:58 PM
 Revision: 0

 Page: 1 of 1
 Date: 10/10/10

KPCo Case No. 2014-00264 Attorney General's First Set of Data Requests Dated September 19th, 2014 Item No. 1 Attachment 1 Page 23 of 31

Field Service Report Form QSF FS 801



Customer: AEP KRAMMER-MITCHELL	Date 6/2/14 Mon.	Report No.	22
Location: STATE RT 2 CRESAP, WEST VIR	GINIA	Purchase Order No.:	NA
Equipment: CBU	Date: 6/2/14	Sheet No.	1
Service at Reg. Time: 8.0 hrs.	Comments: 6014-3 HP Charge# 103002		
Service at Over-Time: 2.0 hrs.	Comments:		
Travel at Reg. Time: hrs.	Comments: weather partly cloudy		

- 1. Arrived site 06:55
- Finished cleaning the bucket drive gear case. Added 37 gal of oil to the gear case. Installed the upper half of the gear case. We need a new garlock seal for the line shaft It has been ordered.
- 3. Gave the size, grade and # of bolts which we need to attach the buckets.
- 4. Structural crew completed the work on the upper side of the bucket chutes. Working on removing the baffle in the discharge chute which was pointed in the wrong direction.
- 5. Installed the air hoist (10 ton) to assist installing the buckets.
- 6. Removed the coal from the buckets which were exposed. We still have 8 buckets which have some coal will be discharged onto the collecting conveyor. We will vaccum this coal after we have the buckets rotated onto the boom.
- 7. Left job site 17:45

Field Service Technician Sign-Off	Customer Sign-Off	
FRANK FALCON CONSULTANT	*	

Last Viewed: 9/29/2014 2:58 PM	Revision: 0
Page: 1 of 1	Date: 10/10/10

KPCo Case No. 2014-00264 Attorney General's First Set of Data Requests Dated September 19th, 2014 Item No. 1 Attachment 1 Page 24 of 31

Field Service Report Form QSF FS 801



Customer: AEP KRAMMER-MITCHELL	Date 6/3/14 Tue.	Report No.	23
Location: STATE RT 2 CRESAP, WEST VIR	RGINIA	Purchase Order No.:	NA
Equipment: CBU	Date: 6/3/14	Sheet No.	1
Service at Reg. Time: 8.0 hrs.	Comments: 6014-3	HP Charge# 103002	
Service at Over-Time: 5.0 hrs.	Comments:		
Travel at Reg. Time: hrs.	Comments: weather	partly cloudy	

Report Details:

- 1. Arrived site 07:05
- 2. Completed installation of the top cover for the bucket drive gearing.
- 13:00 completed installing the wear plates for the deflector plates leading to the gathering conveyor.
- Rigging installed to pull the top side buckets. Rigging angle not good to move the buckets. Re rigged to get a better angle.
- 5. 20:35 tied the top side buckets after moving the buckets and lead chain over the sprocket. We will re rig from the bottom side of the bucket boom tomorrow.
- 6. Left site 20:40

Field Service Technician Sign-Off	Customer Sign-Off
FRANK FALCON CONSULTANT	

Last Viewed: 9/29/2014 2:59 PM Revision: 0

Page: 1 of 1 Date: 10/10/10

KPCo Case No. 2014-00264 Attorney General's First Set of Data Requests Dated September 19th, 2014 Item No. 1 Attachment 1 Page 25 of 31

Field Service Report Form QSF FS 801



Customer: AEP KRAMMER-MITCHELL	Date 6/4/14 Wed.	Report No.	24
Location: STATE RT 2 CRESAP, WEST VIR	RGINIA	Purchase Order No.:	NA
Equipment: CBU	Date: 6/4/14	Sheet No.	1
Service at Reg. Time: 8.0 hrs.	Comments: 6014-3	HP Charge# 103002	
Service at Over-Time: 2.0 hrs.	Comments:		
Travel at Reg. Time: hrs.	Comments: weather	partly cloudy	

Report Details:

- Arrived site 06:55 Met with crew JSA review, need to remove the air hoist to the lower section of the boom to continue installing the buckets.
- 2. 10:00 Rigging in place started to pull the buckets around the head shaft. Hoists have little power. Large amount of water in the air lines. Installed moisture separators on the air compressors. Little change.
- 3. Check the air falls for restrictions and moved the separators near the falls. Tested the fall they are now able to move the complete weight of the buckets.
- 4. Problem getting the first bucket onto the skid rails greased the beginning rails. The air assist motor on the drive does not have enough power to drive the head shaft and as we use the air pullers which are connected to the chain it rotates the bucket causing the bucket lip to dig into the skid rail. We were not able to install the chain falls higher for a better angle to pull the buckets.
- Working on installing come-a-long on the bucket lower section and attach it to the chain to keep the bucket from rotating. Heavy rain 17:35. The crew was informed rain will continue for the next couple of hours and call it a day at 17:45
- 6. Left site 17:50

Field Service Technician Sign-Off

FRANK FALCON CONSULTANT

Customer Sign-Off

Last Viewed: 9/29/2014 3:04 PM Revision: 0

Page: 1 of 1 Date: 10/10/10

KPCo Case No. 2014-00264 Attorney General's First Set of Data Requests Dated September 19th, 2014 Item No. 1 Attachment 1 Page 26 of 31

Field Service Report Form QSF FS 801



Customer: AEP KRAMMER-MITCHELL	Date 6/5/14 Thu.	Report No.	245
Location: STATE RT 2 CRESAP, WEST VIR	GINIA	Purchase Order No.:	NA
Equipment: CBU	Date: 6/5/14	Sheet No.	1
Service at Reg. Time: 8.0 hrs.	Comments: 6014-3	HP Charge# 103002	
Service at Over-Time: 2.5 hrs.	Comments:		
Travel at Reg. Time: hrs.	Comments: weather partly cloudy		

- 1. Arrived site 06:50
- Made final adjustment to the chain falls to rotate the bucket to pull the buckets onto the slide plates.
- 3. Using the air drive and the air fall we pulled the buckets through the boom.
- 4. 14:00 connected the both chains. Vacuum Truck is removing the coal from the discharge chute.
- 5. 18:15 Vacuum crew completed removal of the coal from the chute. Started work on the repair of the discharge chute and installing the outboard seal for the head shaft.
- Left site 18:25 received call from Will we do not have the inboard side of the head shaft. Dave will get us another seal.
 - Plans for tomorrow is the install the missing buckets and continue work the discharge chute, remove rigging, and round up bolts for the covers.

ield Service Technician Sign-Off	Customer Sign-Off
FRANK FALCON CONSULTANT	The second secon

Last Viewed: 9/29/2014 3:05 PM		Revision: 0	
Page: 1 of 1	ì	Date: 10/10/10	

KPCo Case No. 2014-00264 Attorney General's First Set of Data Requests Dated September 19th, 2014 Item No. 1 Attachment 1 Page 27 of 31

Field Service Report Form QSF FS 801



Customer: AEP KRAMMER-MITCHELL	Date 6/6/14 Fri.	Report No.	26
Location: STATE RT 2 CRESAP, WEST VIR	RGINIA	Purchase Order No.:	NA
Equipment: CBU	Date: 6/6/14	Sheet No.	1
Service at Reg. Time: 8.0 hrs.	Comments: 6014-3	HP Charge# 103002	
Service at Over-Time: 4.0 hrs.	Comments:		
Travel at Reg. Time: hrs.	Comments: sunny n	no rain forecast	

Report Details:

- 1. Arrived site 06:50
- 2. Completed installing the head shaft inboard seal time consuming bolt clearance between the case cover and the structure is tight (poor design engineering).
- 3. Millwrights completed installing the buckets.
- 4. Iron Workers working on the discharge chute.
- 5. Left site 19:30 any issue informed crew I was on call.
- 6. Safety tour advised us to remove all tools and equipment not being used off the barge unloader. 3 hours spent removing the equipment.

Field Service Technician Sign-Off	Customer Sign-Off
FRANK FALCON CONSULTANT	

 Last Viewed: 9/29/2014 3:05 PM
 Revision: 0

 Page: 1 of 1
 Date: 10/10/10

KPCo Case No. 2014-00264 Attorney General's First Set of Data Requests Dated September 19th, 2014 Item No. 1 Attachment 1 Page 28 of 31

Field Service Report Form QSF FS 801



Customer: AEP KRAMMER-MITCHELL	Date 6/7/14 Sat.	Report No.	27
Location: STATE RT 2 CRESAP, WEST VIR	GINIA	Purchase Order No.:	NA
Equipment: CBU	Date: 6/7/14	Sheet No.	1
Service at Reg. Time: 1.0 hrs. (Standby)	Comments: 6014-3 HP Charge# 103002		
Service at Over-Time: 7.0 hrs.	Comments:		
Travel at Reg. Time: hrs.	Comments: sunny no rain forecast		

Report Details:

- 1. Arrived site 07:00
- 2. Meeting with Kevin, Will, and Pat on schedule of work today. To stop any interference and progress of work the mill wrights will be removing and installing the dust curtain and the inboard seal. The iron workers will continue to install wear plates and the skin of the discharge chute. Before the end of the day when everyone is clear we will rotate the buckets with the air assist checking for any interference. Millwright will fill in to see if we can start installing any grease line which had to be removed.
- 3. Received the seal and the new curtain.
- 4. Left site 12:15 advised crew I would return later for rotation of the buckets.
- 5. Returned site 17:45 Millwright have installed the inboard seal and have the curtain hanging it has not been attached. Meeting with the ironworkers they continue working on the discharge chute.
- 6. Did not want to interfere with the work on the discharge chute still installing wear plates advise the millwrights to install air lines from the air compressor for plant air is not enough to rotated the air drive.
- 7. Left site 19:25 plan to rotate the buckets first thing tomorrow to check for interference.

Field Service Technician Sign-Off
FRANK FALCON CONSULTANT

Customer Sign-Off
Customer Sign-Off

 Last Viewed: 9/29/2014 3:06 PM
 Revision: 0

 Page: 1 of 1
 Date: 10/10/10

KPCo Case No. 2014-00264 Attorney General's First Set of Data Requests Dated September 19th, 2014 Item No. 1 Attachment 1 Page 29 of 31

Field Service Report Form QSF FS 801



Customer: AEP KRAMMER-MITCHELL	Date 6/8/14 Sun.	Report No.	28
Location: STATE RT 2 CRESAP, WEST VIRG	SINIA	Purchase Order No.:	NA
Equipment: CBU	Date: 6/8/14	Sheet No.	1
Service at Reg. Time: 3.0 hrs. (Standby)	Comments: 6014-3 HP Charge# 103002		
Service at Over-Time: 5.0 hrs.	Comments:		
Travel at Reg. Time: hrs.	Comments: sunny no rain forecast		

- 1. Arrived site 07:00
- Rotated the buckets with the air drive (very slow) needed to check the full rotation for any
 interference. Need to ensure when the next bucket after the missing bucket in direction of
 rotation would not have an issue of riding up onto the slide plates. We did notice with the
 boom at this angle when the missing bucket exit the discharge chute it want to roll the
 next bucket coming down the chute.
- 3. Ironworkers still working on the discharge chute. Advised the millwright to attach the lower half of the curtain. The spring will be tensioned when the boom is in the raised position tomorrow. Millwright will change the shoes on the hoist brake. Also asked Will to get measurement for the bent piping for the oil recirc. System for the bucket drive gear box.
- Left site 12:00 advised crew I would return later in the day to check the progress of the work.
- Spoke with Will and Pat at 19:00 on progress of work. The brake shoes were replaced on one of the hoist brakes. The curtain was connected to the lower section of the boom. Installing the cover plates at the head section. Grease lines will have to be connected AM tomorrow.

Field Service Technician Sign-Off	Customer Sign-Off	
FRANK FALCON CONSULTANT		

Last Viewed: 9/29/2014 3:07 PM	Revision: 0		
Page: 1 of 1	Date: 10/10/10		

KPCo Case No. 2014-00264 Attorney General's First Set of Data Requests Dated September 19th, 2014 Item No. 1 Attachment 1 Page 30 of 31

Field Service Report Form QSF FS 801



Customer: AEP KRAMMER-MITCHELL	Date 6/9/14 Mon.	Report No.	29
Location: STATE RT 2 CRESAP, WEST VIR	RGINIA	Purchase Order No.:	NA
Equipment: CBU	Date: 6/9/14	Sheet No.	1
Service at Reg. Time: 8.0 hrs.	Comments: 6014-3 HP Charge# 103002		
Service at Over-Time: hrs.	Comments:		
Travel at Reg. Time: hrs.	Comments: sunny no rain forecast		

Report Details:

- 1. Arrived site 07:00
- 2. Finishing installing the grease lines and installing a new section of pipe for the oil recirculation pump.
- Ironworkers are removing all material off the machine. Called for the scaffolding contractor to remove the scaffold on the rear side of the machine to install the ladder cage which was removed.
- 4. Check the outboard brake assembly on the boom hoist. Found the inner shoe was not moving freely when the brake was released. Loosen up the pivot bolt 1/8 turn to free up the brake shoe.
- Raised the boom, Will checked the brake for proper operation. The brake did not drag and set properly.
- 6. Waiting for attachment bolts for the last bucket. Scaffolding contractor will be removing the remainder of the scaffolding in the morning while we install the last bucket.
- 7. Left job site 15:35

Field Service Technician Sign-Off
FRANK FALCON CONSULTANT

Customer Sign-Off

 Last Viewed: 9/29/2014 3:07 PM
 Revision: 0

 Page: 1 of 1
 Date: 10/10/10

KPCo Case No. 2014-00264 Attorney General's First Set of Data Requests Dated September 19th, 2014 Item No. 1 Attachment 1 Page 31 of 31

Field Service Report Form QSF FS 801



Customer: AEP KRAMMER-MITCHELL	Date 6/10/14 Tue.	Report No.	30	
Location: STATE RT 2 CRESAP, WEST VIRGINIA		Purchase Order No.:	NA	
Equipment: CBU	Date: 6/10/14	Sheet No.	1	
Service at Reg. Time: 8.0 hrs.	Comments: 6014-3	Comments: 6014-3 HP Charge# 103002		
Service at Over-Time: 3.0 hrs.	Comments:	Comments:		
Travel at Reg. Time: 8.0 hrs. see comme	ent Comments: Travel M	Comments: Travel Moundsville WV to home Smithfield, VA (Wed.)		

Report Details:

- 1. Arrived site 07:00
- 2. 11:30 Completed installing the last bucket.
- 3. 13:00 raised the boom to adjust the curtain as per the drawing. Lowered the boom the curtain did not retract. Called HP talked with Tim McCoy about the issue he said the drawing is wrong he had the same problems and adjusted the curtain in the lower position raising the boom to load the spring.
- 4. 15:00 The machine is clear for operation.
- 5. Started reclaiming 17:45 after clearing all alarms. The CBU operated as designed. Note: Keep in mind the chain is stretched and will over time start to wear at the new sprocket. We also know we have a weaken section where the chain bushing was damaged during the removal of the bucket. Jeffery only runs this designed chain on a specific order. Discussed my thoughts with Dave on how to change the chain. Left site 18:25

Field Service Technician Sign-Off
FRANK FALCON CONSULTANT

Customer Sign-Off

 Last Viewed: 9/29/2014 3:07 PM
 Revision: 0

 Page: 1 of 1
 Date: 10/10/10

KPSC Case No. 2014-00264 Attorney General's Initial Data Requests Dated September 19, 2014 Item No. 2 Page 1 of 1

Kentucky Power Company

REQUEST

Reference Application at page 4-5, paragraph 14. Please supply copies of the relevant agreements between Appalachian Power and relevant coal suppliers, including Trafigura and RWE Americas, and identify the specific terms in the agreements relating to Appalachian Power's satisfaction obligations and/or resulting demurrage charges.

RESPONSE

APCo's contracts with these suppliers were not utilized in this assignment process.

Please refer to the Company's response to AG-1-3 for a discussion of the contract matters related to the assignment and the hoped-for but unrealized alternative to have the diverted coal applied to "satisfy" Appalachian Power Company's (APCo's) obligations under its agreements with Trafigura and RWE Americas. As an agreement could not be reached for this alternative, the assignment was made under Kentucky Power's contracts with Trafigura and RWE Americas.

KPSC Case No. 2014-00264 Attorney General's Initial Data Requests Dated September 19, 2014 Item No. 3 Page 1 of 1

REQUEST

Reference Application at page 4, paragraph 14. Explain why Kentucky Power was bound under Appalachian Power's coal contracts for supply to the Mitchell generating station, which is co-owned by Kentucky Power and AEP Generation Resources?

RESPONSE

Kentucky Power is not bound under Appalachian Power Company's (APCo's) coal supply contracts with Trafigura and RWE Americas. The assignment was executed under the assignment provisions contained in Kentucky Power's contracts with Trafigura and RWE Americas, as filed with the Commission.

The discussion on page 4, paragraph 14, of the Application concerned the possibility of taking delivery of the diverted barges under APCo's existing coal supply contracts with Trafigura and RWE Americas and, after the barge unloader is repaired, this amount of coal would be delivered by these suppliers to the Mitchell Plant under the Trafigura and RWE Americas contracts with Kentucky Power. If this alternative had been possible, it would have avoided the demurrage charges for Kentucky Power by delaying receipt of the coal until after the barge unloader was again operational and, correspondingly, would not have required the assignment.

As Kentucky Power is responsible for all fuel procurement for the Mitchell plant, Kentucky Power is the documented buyer and signatory in coal supply contracts for Mitchell plant. AEP Generation Resources is not involved in the acquisition or management of coal supply contracts.

KPSC Case No. 2014-00264 Attorney General's Initial Data Requests Dated September 19, 2014 Item No. 4 Page 1 of 1

Kentucky Power Company

REQUEST

Reference Application at page 5, paragraphs 14 and 16. Explain why Kentucky Power and not AEP Generation Resources was the assignor in the affiliate transaction resulting coal contract delivery assignments assigned to Appalachian Power and listed in Exhibit 3 to the Application.

RESPONSE

As Kentucky Power is responsible for all fuel procurement for the Mitchell plant, Kentucky Power is the documented buyer and signatory in coal supply contracts for Mitchell plant. AEP Generation Resources is not involved in the acquisition or management of coal supply contracts.

KPSC Case No. 2014-00264 Attorney General's Initial Data Requests Dated September 19, 2014 Item No. 5 Page 1 of 2

Kentucky Power Company

REQUEST

Reference Federal Energy Regulatory Commission ("FERC") Docket No. ER14-95-000, In Re American Electric Power Service Corporation, Order Conditionally Granting Request for Waiver of Affiliate Restrictions (Issued December 23, 2013). Please explain in detail whether the coal assignments made by Kentucky Power to Appalachian Power are governed by 18 C.F.R. § 39.9(c)(2)(1) or any other federal affiliate restrictions regarding fuel procurement.

- a. If yes, has Kentucky Power and/or AEPSC filed a request with FERC for affiliate waiver restrictions between Kentucky Power and Appalachian Power. If not, why not.
- b. If no, please explain Kentucky Power's distinction between its affiliation with AEP Generation Resources and its affiliation with Appalachian Power as it relates to shared fuel procurement. Please provide any relevant legal citations and FERC Orders upon which the answer relies.
- c. See above referenced FERC Order, Docket No. ER14-95-000 (December 23, 2013) at page 18. If Kentucky Power has not sought FERC approval, please explain why it believes it is exempt pursuant to FERC's directive that any future plans regarding joint fuel procurement "would require a new waiver request."
- d. See above referenced FERC Order, Docket No. ER14-95-000 (December 23, 2013) at page 19-20, paragraph 48, wherein it states: "As an additional condition of this waiver, Applicants will be required to maintain sufficient records to enable the Commission [FERC] to audit whether the representations and commitments made in their request for waiver remain true and accurate, including their commitment that captive customers will not be harmed." Please provide any and all relevant records regarding this transaction that in possession of Kentucky Power that ensures that this affiliate transaction will not harm Kentucky customers

KPSC Case No. 2014-00264 Attorney General's Initial Data Requests Dated September 19, 2014 Item No. 5 Page 2 of 2

RESPONSE

Kentucky Power assumes this data request is intended to reference 18 C.F.R. § 35.39 which addresses affiliate restrictions, and not 18 C.F.R. § 35.9, which addresses the requirement for filing rate schedules, tariffs, or service agreements, and which does not contain a subsection (c)(2)(1). The coal assignments made by Kentucky Power to Appalachian Power are not governed under 18 C.F.R. § 35.39 which is limited to transactions between a market-regulated power sales affiliate and a franchised public utility with captive customers. The assignment transaction was from a franchised public utility with captive customers (Kentucky Power) to another franchised public utility with captive customers (Appalachian Power).

- a & b. Kentucky Power and/or AEPSC does not intend to file a request with the FERC for affiliate waiver restrictions. Kentucky Power is responsible for all fuel purchases and management for the Mitchell Plant and is the sole signatory to the coal supply contracts. The transaction is from one franchised public utility with captive customers to another.
- c. As Kentucky Power is responsible for all fuel procurement for the Mitchell Plant, Kentucky Power is the sole signatory for its coal supply contracts. AEP Generation Resources is not involved in the acquisition or management of coal supply contracts for the Mitchell Plant and, as to the assignment of coal delivery, is not a signatory to the assigned contracts and was not involved in the decision to assign the delivery of the coal barges to APCo.
- The coal diversion from Kentucky Power to APCo is not related to the Order in d. Docket No. ER14-95-000 that conditionally granted a limited waiver of the information sharing provision, the asymmetrical pricing rule, and the separation of functions requirement of 18 C.F.R. § 35.39 to permit the continuation of existing practices with respect to the Mitchell Plant. As explained above, the coal assignments made by Kentucky Power to Appalachian Power are not governed under 18 C.F.R. § 35.39 as the transaction is from a franchised public utility with captive customers (Kentucky Power) to another franchised public utility with captive customers (Appalachian Power). As a result, the Order in Docket No. ER14-95-000 is not relevant with respect to this transaction. Notwithstanding this position, please refer to Exhibit 2 and 3 of the Application for the calculation of net benefits realized by Kentucky Power's customers and for the internal assignment documents that reflect the contract pricing, respectively, for relevant records that demonstrate that this affiliate transaction will not harm Kentucky Power customers.

KPSC Case No. 2014-00264 Attorney General's Initial Data Requests Dated September 19, 2014 Item No. 6 Page 1 of 2

Kentucky Power Company

REQUEST

Presuming the Public Service Commission of Kentucky determines (a) that KRS 278.2207(1)(a) applies to the assignments from Kentucky Power to Appalachian Power and (b) that a deviation is warranted as "in the public interest" pursuant to KRS 278.2207(2), what guarantee(s) or commitments will Kentucky Power provide to ensure that such a waiver of affiliate restrictions to permit joint fuel procurement in this instance will not set a precedent for future joint fuel procurements that could result in detriments to Kentucky ratepayers in the future? Please explain your answer fully.

RESPONSE

Kentucky Power disagrees with and rejects as inaccurate two of the predicates to this data request. The assignment of the coal deliveries from Kentucky Power to Appalachian Power Company does not constitute the joint procurement of fuel by Kentucky Power and an affiliate. Instead, this was limited assignment of the delivery of a total of seven barges of coal. The coal was initially contracted for by Kentucky Power pursuant to two Coal Purchase and Sales Agreements with Trafigura AG and a Coal Contract with RWE Trading Americas Inc. AEP Generation Resources and Appalachian Power were not and did not become a parties to the three agreements under which the coal deliveries were to be received by Kentucky Power. The coal deliveries were assigned by Kentucky Power to Appalachian Power in response to the unanticipated forced outage of the coal barge unloader at the Mitchell generating station. By assigning the deliveries to Appalachian Power on an emergency basis the Company was able to avoid incurring demurrage charges that were greater than the foregone difference between the contract price for the coal and the market price.

Second, the data request states that "joint fuel procurements ... could result in detriments to Kentucky ratepayers in the future." Kentucky Power has no reason to believe that joint procurements, in and of themselves, are detrimental to the Company's customers.

KPSC Case No. 2014-00264 Attorney General's Initial Data Requests Dated September 19, 2014 Item No. 6 Page 2 of 2

The Company seeks to comply with all applicable statutes and regulations. Where possible, and as it has done in the past, the Company in the future will continue to seek any required deviation from the affiliated transaction statutes before entering into an arrangement that might implicate the statutes. It was not possible to do so in the case of these seven deliveries because circumstances (the imminent delivery of the coal to the Mitchell generating station at the time of forced outage of the coal unloader, and the need to avoid the demurrage charges) prevented the Company from seeking and obtaining the deviation prior to the delivery assignments.