

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

AN ELECTRONIC EXAMINATION OF THE	)	
APPLICATION OF THE FUEL ADJUSTMENT	)	CASE NO.
CLAUSE OF KENTUCKY POWER COMPANY	)	2022-00036
FROM MAY 1, 2021 THROUGH OCTOBER 31,	)	
2021	)	

NOTICE OF FILING

Notice is given to all parties that the following materials have been filed into the record of this proceeding:

- The digital video recording of the evidentiary hearing conducted on August 4, 2022 in this proceeding;
- Certification of the accuracy and correctness of the digital video recording;
- All exhibits introduced at the evidentiary hearing conducted on August 4, 2022 in this proceeding;
- A written log listing, inter alia, the date and time of where each witness' testimony begins and ends on the digital video recording of the evidentiary hearing conducted on August 4, 2022.

A copy of this Notice, the certification of the digital video record, and hearing log have been served upon all persons listed at the end of this Notice. Parties desiring to view the digital video recording of the hearing may do so at <https://youtu.be/InNmAj6rDe8>.

Done at Frankfort, Kentucky, this 15<sup>th</sup> day of September 2022.



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Linda C. Bridwell

Executive Director

Public Service Commission of Kentucky

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

AN ELECTRONIC EXAMINATION OF THE )  
APPLICATION OF THE FUEL ADJUSTMENT )  
CLAUSE OF KENTUCKY POWER COMPANY FROM )  
NOVEMBER 1, 2021 THROUGH OCTOBER 31, )  
2021 )

CASE NO.  
2022-00036

CERTIFICATION

I, Candace H. Sacre, hereby certify that:

1. The attached flash drive contains a digital recording of the Formal Hearing in the above-styled proceeding on August 4, 2022. The Formal Hearing Log is included with the recording on August 4, 2022;
2. I am responsible for the preparation of the digital recording;
3. The digital recording accurately and correctly depicts the Formal Hearing of August 4, 2022; and
4. The Formal Hearing Log attached to this Certificate accurately and correctly states the events that occurred at the Formal Hearing of August 4, 2022, and the time at which each occurred.

Signed this 12th day of September, 2022.



Candace H. Sacre  
Administrative Specialist III



Stephanie Schweighardt  
Notary Public State at Large ID#: 614400  
Commission Expires: January 14, 2023



# Session Report - Detail

FAC Hearings 04Aug2022

2022-00036 through 2022-00041

Date:	Type:	Location:	Department:
8/4/2022	Fuel Adjustment Clause	Hearing Room 1	Hearing Room 1 (HR 1)

Witness: Delbert Billiter; Scott Bishop; Jason Burden; Michelle Carpenter; Brad Daniel; Jeffery Dial; Michael Drake; Andrea Fackler; Ronald Gregory; Natalie Hankins; Mark Horn; Kimberly Hughes; Craig Johnson; Paul Massie; Jim McClay; Libbie Miller; Vicky Payne; Brett Riggins; Douglas Rosenberger; Charles Schram; Jason Stegall; Jennifer Stone; Clinton Stutler; John Swesz; Julia Tucker; Tiffany Weir; Stuart Wilson  
 Judge: Mary Pat Regan  
 Clerk: Candace H Sacre

Event Time	Log Event	
9:01:41 AM	Session Started	
9:01:42 AM	Commissioner Regan Note: Sacre, Candace H	Good morning, we are on the record in Cases No. 2022-00036, 2022-00037, 2022-00038, 2022-00039, 2022-00040, and 2022-00041, which are the six-month Fuel Adjustment Clause reviews, from May 1, 2021, through October 31, 2021, for Kentucky Power, East Kentucky Power Cooperative, Kentucky Utilities Company, Louisville Gas and Electric Company, Duke Energy Kentucky, and Big Rivers Electric, respectively.
9:02:25 AM	Commissioner Regan Note: Sacre, Candace H	My name is Mary Pat Regan, and I am the Commissioner on the Public Service Commission, and I will be presiding today.
9:02:32 AM	Commissioner Regan Note: Sacre, Candace H	Hearing recommendations. (Click on link for further comments.)
9:02:40 AM	Commissioner Regan Note: Sacre, Candace H	Public comments. (Click on link for further comments.)
9:02:55 AM	Commissioner Regan Note: Sacre, Candace H	The six-month reviews require the PSC to examine the operation of FAC for these companies to disallow any improper expenses. We will proceed today by taking the cases in sequence with KU and LG&E taken concurrently.
9:03:14 AM	Commissioner Regan Note: Sacre, Candace H	Testimony has been previously given and has been filed into the record along with numerous documents. Any witnesses called to testify today will be subjected to cross examination by Staff and Intervenor counsel for the purposes of obtaining additional information or clarification of information previously on the record.
9:03:37 AM	Commissioner Regan Note: Sacre, Candace H	First, I will start with Case No. 2022-00036, Kentucky Power, at this time we will have the entry of appearance of counsel.
9:03:59 AM	Atty Overstreet Kentucky Power Note: Sacre, Candace H	Mark Overstreet, outside counsel for Kentucky Power Company.
9:04:27 AM	Executive Advisor Attorney Pinney PSC Note: Sacre, Candace H	JEB Pinney, members of Staff with me John Rogness and Christian Everly.
9:04:39 AM	Commissioner Regan Note: Sacre, Candace H	And, for Kentucky Industrial Utility Customers, Mike Kurtz and Kurt Boehm. (Click on link for further comments.)
9:04:47 AM	Commissioner Regan Note: Sacre, Candace H	Public notice. (Click on link for further comments.)

9:05:31 AM	Commissioner Regan Note: Sacre, Candace H	Public comments. (Click on link for further comments.)
9:06:13 AM	Commissioner Regan Note: Sacre, Candace H	Call your witnesses. (Click on link for further comments.)
9:06:40 AM	Atty Overstreet Kentucky Power - witness Dial Note: Sacre, Candace H	Direct Examination. Name, position, and business address?
9:06:58 AM	Atty Overstreet Kentucky Power - witness Dial Note: Sacre, Candace H	Have caused to be filed adoption of data request responses provided by Kimberly Chilcote?
9:07:24 AM	Atty Overstreet Kentucky Power - witness Dial Note: Sacre, Candace H	Have any corrections or supplementation to responses?
9:08:15 AM	Atty Overstreet Kentucky Power Note: Sacre, Candace H	Will file amended response. (Click on link for further comments.)
9:08:26 AM	Atty Overstreet Kentucky Power - witness Dial Note: Sacre, Candace H	If asked same questions today, responses be same?
9:09:33 AM	Atty Overstreet Kentucky Power - witness Kerns Note: Sacre, Candace H	Direct Examination. Please state your full name, position, and business address?
9:09:51 AM	Atty Overstreet Kentucky Power - witness Kerns Note: Sacre, Candace H	Have caused to be filed responses?
9:10:00 AM	Atty Overstreet Kentucky Power - witness Kerns Note: Sacre, Candace H	Corrections, additions?
9:10:06 AM	Atty Overstreet Kentucky Power - witness Kerns Note: Sacre, Candace H	If asked questions today, responses be same?
9:10:19 AM	Atty Overstreet Kentucky Power - witness Stutler Note: Sacre, Candace H	Direct Examination. Please state your name, position, and business address?
9:10:35 AM	Atty Overstreet Kentucky Power - witness Stutler Note: Sacre, Candace H	Have caused to be filed responses?
9:10:41 AM	Atty Overstreet Kentucky Power - witness Stutler Note: Sacre, Candace H	Corrections, supplementations?
9:10:46 AM	Atty Overstreet Kentucky Power - witness Stutler Note: Sacre, Candace H	If asked questions today, responses be same?
9:11:02 AM	Atty Overstreet Kentucky Power - witness Stegall Note: Sacre, Candace H	Direct Examination. Please state name, position, and business address?
9:11:09 AM	Atty Overstreet Kentucky Power - witness Stegall Note: Sacre, Candace H	Cause to be filed responses?
9:11:17 AM	Atty Overstreet Kentucky Power - witness Stegall Note: Sacre, Candace H	Corrections, additions?
9:11:22 AM	Atty Overstreet Kentucky Power - witness Stegall Note: Sacre, Candace H	If asked same questions today, responses be same?
9:11:28 AM	Atty Overstreet Kentucky Power - witness Bishop Note: Sacre, Candace H	Direct Examination. Please state name, position, and business address?
9:11:45 AM	Atty Overstreet Kentucky Power - witness Bishop Note: Sacre, Candace H	Confirm have filed data request responses?
9:11:55 AM	Atty Overstreet Kentucky Power - witness Bishop Note: Sacre, Candace H	Corrections, additions?
9:12:01 AM	Atty Overstreet Kentucky Power - witness Bishop Note: Sacre, Candace H	If asked same questions today, responses be same?
9:12:06 AM	Atty Overstreet Kentucky Power - witness Massie Note: Sacre, Candace H	Direct Examination. Please state name, position, and business address?

9:12:22 AM	Atty Overstreet Kentucky Power - witness Massie Note: Sacre, Candace H	Cause to be filed responses?
9:12:28 AM	Atty Overstreet Kentucky Power - witness Massie Note: Sacre, Candace H	Additions, corrections?
9:12:33 AM	Atty Overstreet Kentucky Power - witness Massie Note: Sacre, Candace H	Asked same questions today, responses be same?
9:12:43 AM	Atty Overstreet Kentucky Power - witness Rosenberger Note: Sacre, Candace H	Direct Examination. Please state your name, position, and business address?
9:12:57 AM	Atty Overstreet Kentucky Power - witness Rosenberger Note: Sacre, Candace H	Cause to be filed responses?
9:13:04 AM	Atty Overstreet Kentucky Power - witness Rosenberger Note: Sacre, Candace H	Corrections?
9:13:07 AM	Atty Overstreet Kentucky Power - witness Rosenberger Note: Sacre, Candace H	Additions?
9:13:09 AM	Atty Overstreet Kentucky Power - witness Rosenberger Note: Sacre, Candace H	Asked same questions, responses be same?
9:13:18 AM	Commissioner Regan Note: Sacre, Candace H	Witnesses are sworn.
9:13:34 AM	Commissioner Regan Note: Sacre, Candace H	Cross examination?
9:13:38 AM	Atty Kurtz KIUC - witness Bishop Note: Sacre, Candace H	Cross Examination. Understand heightened awareness fuel adjustment review cases, level of fuel adjustment charge, Oct 2021 \$22.52 megawatt hour?
9:14:19 AM	Atty Kurtz KIUC - witness Bishop Note: Sacre, Candace H	Average residential customer 2021 used 1,232 KW hours per month
9:14:30 AM	Atty Kurtz KIUC - witness Bishop Note: Sacre, Candace H	Fuel adjustment \$28 Oct last year almost \$28 increase?
9:14:41 AM	Atty Kurtz KIUC - witness Bishop Note: Sacre, Candace H	Main driver expensive purchase power run through fuel adjustment?
9:14:58 AM	Atty Kurtz KIUC - witness Bishop Note: Sacre, Candace H	Kentucky Power unique, use peaking unit equivalent, the PUE?
9:15:08 AM	Atty Kurtz KIUC - witness Bishop Note: Sacre, Candace H	When cost purchase power above PUE not recoverable in fuel adjustment but when below is?
9:15:22 AM	Atty Kurtz KIUC - witness Bishop Note: Sacre, Candace H	Kentucky Power unique in that forced outage replacement costs excluded from fuel adjustment deferred and then recovered in PPA rider?
9:15:42 AM	Atty Kurtz KIUC - witness Bishop Note: Sacre, Candace H	Also unique in that Rockport fuel cost run through FAC but not apply forced outage limitation to Rockport?
9:16:01 AM	Atty Kurtz KIUC - witness Stegall Note: Sacre, Candace H	Kentucky Power not buy and sell own generation in PJM, done for you by AEP Service Corp?
9:16:22 AM	Atty Kurtz KIUC - witness Stegall Note: Sacre, Candace H	AEP Service Corporation buys all load from PJM for all AEP operating companies?
9:16:37 AM	Atty Kurtz KIUC - witness Stegall Note: Sacre, Candace H	The AEP Service Corporation bids in the generation into PJM market and revenue allocated among operating companies and credited back to ratepayers through fuel adjustment as offset?
9:17:29 AM	Atty Kurtz KIUC Note: Sacre, Candace H	Because Kentucky Power unique, build foundation, have exhibits.

9:17:40 AM	Atty Kurtz KIUC Note: Sacre, Candace H	Ask this be marked as KIUC Hearing Exhibit 1. (Click on link for further comments.)
9:18:09 AM	Atty Kurtz KIUC - witness Bishop Note: Sacre, Candace H	Skip pages 1, 2, and 3, peaking unit equivalent methodology approved by Commission in 2002 for Kentucky Power?
9:18:38 AM	Atty Overstreet Kentucky Power Note: Sacre, Candace H	Can refer to page 4 of the handout. (Click on link for further comments.)
9:18:57 AM	Atty Kurtz KIUC - witness Bishop Note: Sacre, Candace H	Commission rationale accepted AEP argument Kentucky Power unique in that only had base load coal units and if made purchase power threshold the cost of base load coal few purchase power costs through fuel adjustment PUE allowed raise threshold recovery higher cost purchases?
9:19:32 AM	Atty Overstreet Kentucky Power Note: Sacre, Candace H	Object. (Click on link for further comments.)
9:19:41 AM	Atty Kurtz KIUC - witness Bishop Note: Sacre, Candace H	Page 12 of handout, reading (click on link for further comments), your understanding of Commission's rationale?
9:20:22 AM	Atty Kurtz KIUC - witness Bishop Note: Sacre, Candace H	Page 11 of handout, footnote 3, Commission described AEP proposal use a general electric simple cycle CT with a heat rate of 10,800 in summer and 10,400 in nonsummer appropriate use as proxy unit?
9:20:49 AM	Atty Kurtz KIUC - witness Bishop Note: Sacre, Candace H	Kentucky Power proposed change PUE in 2017 rate case, page 14 of handout, Vaughan proposed adding certain costs to PUE?
9:21:18 AM	Atty Kurtz KIUC - witness Bishop Note: Sacre, Candace H	Commission allowed start-up costs and variable O&M but not firm gas transportation?
9:21:30 AM	Atty Kurtz KIUC - witness Bishop Note: Sacre, Candace H	Page 19 of handout, line 3, Vaughan testimony, read rationale why three items be included in PUE?
9:22:32 AM	Atty Kurtz KIUC - witness Bishop Note: Sacre, Candace H	Idea modifying PUE to mimic cost of CT, and Commission accepted two of three proposed changes?
9:22:44 AM	Atty Kurtz KIUC - witness Bishop Note: Sacre, Candace H	Two changes had effect of raising PUE and raising threshold purchases economical or uneconomical?
9:23:01 AM	Atty Kurtz KIUC - witness Bishop Note: Sacre, Candace H	Page 21, attached to Vaughan testimony start-up costs \$30 MW hour?
9:23:14 AM	Atty Kurtz KIUC - witness Bishop Note: Sacre, Candace H	Vaughan showed \$30 MWh by month for calendar year?
9:23:27 AM	Atty Kurtz KIUC - witness Bishop Note: Sacre, Candace H	AEP adds \$30 MWh startup cost to PUE each and every hour of year?
9:23:51 AM	Atty Kurtz KIUC - witness Bishop Note: Sacre, Candace H	Kentucky Power assuming PUE hypothetical gas combustion turbine start and stop 8,760 times per year?
9:24:13 AM	Atty Kurtz KIUC - witness Bishop Note: Sacre, Candace H	If add \$30 MWh every hour of year 8,760 starts and stops to power plant?
9:24:28 AM	Atty Kurtz KIUC - witness Bishop Note: Sacre, Candace H	Does that mimic way actual combustion turbine be operated?

9:24:37 AM	Atty Kurtz KIUC - witness Stegall Note: Sacre, Candace H	Aware any hypothetical combustion turbine that can start and stop 8,760 times per year?
9:25:05 AM	Atty Kurtz KIUC - witness Stegall Note: Sacre, Candace H	Hear Bishop read Vaughan testimony Commission relied upon purpose is to mimic operations of actual CT?
9:25:24 AM	Atty Kurtz KIUC - witness Stegall Note: Sacre, Candace H	\$30 MWh added to PUE 8,760 times a year?
9:25:45 AM	Atty Kurtz KIUC - witness Stegall Note: Sacre, Candace H	Reason we don't because raised it so high by assuming start and stop 8,760 time per year PUE disallowance insignificant?
9:26:00 AM	Atty Overstreet Kentucky Power Note: Sacre, Candace H	Object. (Click on link for further comments.)
9:28:14 AM	Commissioner Regan Note: Sacre, Candace H	Sustain objection. (Click on link for further comments.)
9:28:28 AM	Atty Kurtz KIUC - witness Bishop Note: Sacre, Candace H	Page 24 of handout, forced outage replacement dollars disallowed from fuel adjustment but recovered in purchase power, answer this question?
9:28:55 AM	Atty Kurtz KIUC - witness Bishop Note: Sacre, Candace H	Page 25 of handout, show review period total purchase power costs \$48.99 million?
9:29:13 AM	Atty Kurtz KIUC - witness Bishop Note: Sacre, Candace H	Forced outages allowance amount \$2.399 million, so disallowed from fuel adjustment but picked up in PPA?
9:29:26 AM	Atty Kurtz KIUC - witness Bishop Note: Sacre, Candace H	PUE disallowance review period \$196,849?
9:29:38 AM	Atty Kurtz KIUC - witness Bishop Note: Sacre, Candace H	Shows 99.6 percent of purchase power cost recovered in fuel adjustment or PPA rider?
9:30:07 AM	Atty Kurtz KIUC - witness Stegall Note: Sacre, Candace H	Questions who responded Staff initial Data Request 1-16, backup information by month all calculations?
9:30:46 AM	Atty Kurtz KIUC - witness Stegall Note: Sacre, Candace H	Excerpt from Response August 2 2021 hour 18, see that highlighted in yellow?
9:31:12 AM	Atty Kurtz KIUC - witness Stegall Note: Sacre, Candace H	Column 7 company's internal load 764 megawatts in that hour?
9:31:20 AM	Atty Kurtz KIUC - witness Stegall Note: Sacre, Candace H	Available generation 925 megawatts?
9:31:31 AM	Atty Kurtz KIUC - witness Stegall Note: Sacre, Candace H	Column 5, Kentucky Power generation actually running 816 megawatts?
9:31:41 AM	Atty Kurtz KIUC - witness Stegall Note: Sacre, Candace H	Column 3 shows AEP in that hour allocated 81 megawatts of purchases at cost of \$66.50 MWh to Kentucky Power?
9:32:14 AM	Atty Kurtz KIUC - witness Stegall Note: Sacre, Candace H	Column 3 says purchases assigned to internal load, so who assigned it, AEP Service Corporation, correct?
9:32:28 AM	Atty Kurtz KIUC - witness Stegall Note: Sacre, Candace H	During that hour, AEP Service Corp assigned 81 megawatts of purchases at \$66.50 MWh to Kentucky Power ratepayers recovered in fuel adjustment?

9:33:01 AM	Atty Kurtz KIUC - witness Stegall Note: Sacre, Candace H	Load was 764, available generation 925 MW, dispatched generation 816, no shortage in generation, Kentucky Power power plants generating more than native load in that hour?
9:33:33 AM	Atty Kurtz KIUC - witness Stegall Note: Sacre, Candace H	What Column 5A mean when says dispatched generation?
9:33:45 AM	Atty Kurtz KIUC - witness Stegall Note: Sacre, Candace H	Power plants running 816 MW and native load 764 MW?
9:34:18 AM	Atty Kurtz KIUC - witness Stegall Note: Sacre, Candace H	Really think so, know how big Vanceburg and Olive Hill are?
9:34:32 AM	Atty Kurtz KIUC - witness Stegall Note: Sacre, Candace H	Why 81 MW allocated to native load when Kentucky Power power plants generating more than native load using?
9:34:55 AM	Atty Overstreet Kentucky Power Note: Sacre, Candace H	Willing to provide more detail in post-hearing data request.
9:35:04 AM	Atty Kurtz KIUC - witness Stegall Note: Sacre, Candace H	Next page of exhibit, Aug 2 2021, hour 18, first total Kentucky Power purchases 160.16 MWh, during the hour 160.16 megawatts?
9:35:33 AM	Atty Kurtz KIUC - witness Stegall Note: Sacre, Candace H	Kentucky Power not purchase AEP Service Corporation purchases?
9:35:39 AM	Atty Kurtz KIUC - witness Stegall Note: Sacre, Candace H	Kentucky Power purchases allocated all-system sales \$78.76?
9:35:50 AM	Atty Kurtz KIUC - witness Stegall Note: Sacre, Candace H	Kentucky Power purchases allocated internal load, there's 81 megawatts saw prior page?
9:35:59 AM	Atty Kurtz KIUC - witness Stegall Note: Sacre, Candace H	Move over see \$66.50 purchase price prior page?
9:36:10 AM	Atty Kurtz KIUC - witness Stegall Note: Sacre, Candace H	In that hour, Big Sandy running \$54 MWh, Mitchell 1 operating \$24.78 MWh, Mitchell 2 \$20 MWh, Rockport 1 \$33, and Rockport 2 \$31, my question why AEP Service Corporation allocate to Kentucky Power 81 megawatts purchases at \$66.50 when all power plants Kentucky Power considerably less expensive and more generation running than native load?
9:36:33 AM	Atty Kurtz KIUC - witness Stegall Note: Sacre, Candace H	Why did AEP Service Corporation allocate to Kentucky Power 81 megawatts purchases at \$65.50 when all power plants less expensive and more generation running than native load?
9:37:10 AM	Atty Kurtz KIUC - witness Stegall Note: Sacre, Candace H	Third column from right, highest of PUE or generation cost \$71.172 every hour?
9:37:32 AM	Atty Kurtz KIUC - witness Stegall Note: Sacre, Candace H	Because \$66.50 purchase less than PUE cap of \$71, all purchase recovered in FAC?
9:37:48 AM	Atty Kurtz KIUC - witness Stegall Note: Sacre, Candace H	\$71.172 every hour of period reflects assumption hypothetical gas combustion turbine start and stop every hour, adding \$30 MWh to cap?
9:38:34 AM	Atty Kurtz KIUC - witness Stegall Note: Sacre, Candace H	Every hour on spreadsheet 20 hours all have exact PUE \$71.172, looking at whole column is same?
9:38:59 AM	Atty Kurtz KIUC - witness Stegall Note: Sacre, Candace H	Know how calculated?
9:39:12 AM	Atty Kurtz KIUC - witness Stegall Note: Sacre, Candace H	See \$3.49 daily gas price per Mcf?

9:39:25 AM	Atty Kurtz KIUC - witness Stegall Note: Sacre, Candace H	3.49 times heat rate of 10,800 divided by 1,000 plus 30 plus variable O&M \$3.48 MWh gives \$71.72?
9:40:22 AM	Atty Kurtz KIUC Note: Sacre, Candace H	Mark KIUC Exhibit 2 and other one KIUC Exhibit 1.
9:40:33 AM	Atty Kurtz KIUC - witness Stegall Note: Sacre, Candace H	Hand you another exhibit, what size hypothetical combustion turbine unit, how many megawatts?
9:41:25 AM	Atty Kurtz KIUC - witness Stegall Note: Sacre, Candace H	Trick question, not have megawatt size, however big needs be cover purchases, your understanding?
9:41:38 AM	Atty Kurtz KIUC - witness Stegall Note: Sacre, Candace H	Assume forced maintenance or planned outages on hypothetical?
9:41:52 AM	Atty Kurtz KIUC - witness Stegall Note: Sacre, Candace H	Central to fuel adjustment, Big Sandy be cap, created this PUE?
9:42:09 AM	Atty Overstreet Kentucky Power Note: Sacre, Candace H	Arguing with witness. (Click on link for further comments.)
9:42:17 AM	Atty Kurtz KIUC Note: Sacre, Candace H	Have marked as KIUC 3. (Click on link for further comments.)
9:43:08 AM	Atty Kurtz KIUC - witness Stegall Note: Sacre, Candace H	Focus on October, have 1-16 electronically, verify if want, on Oct 27 Hour 9, purchases assigned to Kentucky Power 658.19 MW, accept that subject to check?
9:43:33 AM	Atty Kurtz KIUC - witness Stegall Note: Sacre, Candace H	658.19 MW of purchases that were assigned to Kentucky Power on October 27, hour 9?
9:44:52 AM	Atty Kurtz KIUC - witness Stegall Note: Sacre, Candace H	See where internal load same hour 670 MW?
9:45:06 AM	Atty Kurtz KIUC - witness Stegall Note: Sacre, Candace H	During that hour, plants generating 12 MW power native load and purchases 658 MW?
9:45:32 AM	Atty Kurtz KIUC - witness Stegall Note: Sacre, Candace H	Surprise you, during Oct Rockport 1 and 2 not run at all and Big Sandy 1 not run at all?
9:45:53 AM	Atty Kurtz KIUC - witness Stegall Note: Sacre, Candace H	Who that be?
9:46:06 AM	Atty Kurtz KIUC - witness Kerns Note: Sacre, Candace H	Correct neither Rockport units generated at all and Big Sandy not generate at all in October?
9:46:30 AM	Atty Kurtz KIUC - witness Massie Note: Sacre, Candace H	Big Sandy?
9:46:40 AM	Atty Kurtz KIUC - witness Rosenberger Note: Sacre, Candace H	In October, Mitchell 1 ten percent capacity factor?
9:46:49 AM	Atty Kurtz KIUC - witness Stegall Note: Sacre, Candace H	In that hour, 658 MW of purchases was \$66.552 per megawatt hour, lower than PUE \$93, entire purchase recovered through fuel adjustment?
9:47:47 AM	Atty Kurtz KIUC - witness Stegall Note: Sacre, Candace H	Reason PUE was \$93.176 because gas prices high, only thing changes is gas price, why PUE so high?
9:48:26 AM	Atty Kurtz KIUC Note: Sacre, Candace H	Next one is KIUC 4.
9:48:47 AM	Atty Kurtz KIUC - witness Stegall Note: Sacre, Candace H	Data from 1-16 exhibit, correct native load consumption was 385,394 MW hours in month of October?

9:49:25 AM	Atty Kurtz KIUC - witness Stegall Note: Sacre, Candace H	Footnote Company's Response, Staff 1-16, Worksheet Tab, Cell N756, to verify?
9:49:45 AM	Atty Kurtz KIUC - witness Stegall Note: Sacre, Candace H	In October, native load 385,000 MWh, generation was 161,000, AEP assigned purchases of 225,000 MWh to native load, adding correctly?
9:50:53 AM	Atty Kurtz KIUC - witness Stegall Note: Sacre, Candace H	All on FAC schedule, footnoted 1 2 and 3?
9:51:11 AM	Atty Kurtz KIUC - witness Stegall Note: Sacre, Candace H	Total purchase price costs in month \$12.9 million?
9:51:30 AM	Atty Kurtz KIUC - witness Stegall Note: Sacre, Candace H	Average cost of purchases in month \$57.37 MWh, and PUE \$86, total PUE disallowance of \$12.9 million was under \$29,000 in October and does show up on fuel adjustment following month when file actual numbers?
9:52:15 AM	Atty Kurtz KIUC - witness Stegall Note: Sacre, Candace H	Very significant increase in fuel adjustment \$22 MW hour, \$28 rate increase average residential customer, driven by high cost purchases below PUE recoverable in fuel adjustment?
9:52:57 AM	Atty Kurtz KIUC - witness Bishop Note: Sacre, Candace H	Ask power plant managers left-hand side Big Sandy not generate, Rockport 1 and 2 not generate, confirm?
9:53:16 AM	Atty Kurtz KIUC - witness Rosenberger Note: Sacre, Candace H	Mitchell 1 ten percent capacity factor, Mitchell 2 46 percent capacity factor for month?
9:53:29 AM	Atty Kurtz KIUC - witness Rosenberger Note: Sacre, Candace H	Mitchell 2 had fuel cost of \$20.74 and Mitchell 1 \$30.01, Mitchell 1 so high because capacity factor low, usually runs \$24?
9:53:56 AM	Atty Kurtz KIUC - witness Rosenberger Note: Sacre, Candace H	Why Mitchell 2 not run more?
9:54:37 AM	Atty Kurtz KIUC - witness Rosenberger Note: Sacre, Candace H	Run Mitchell units every hour available to run in October?
9:54:56 AM	Atty Kurtz KIUC - witness Rosenberger Note: Sacre, Candace H	Forced outage response to Staff, handout, KIUC 5, recognize this?
9:55:50 AM	Atty Kurtz KIUC - witness Rosenberger Note: Sacre, Candace H	First page, Staff asked for forced outages, provided Big Sandy, Mitchell 1 and 2, asked for same information Rockport, page 2, our understanding?
9:56:10 AM	Atty Kurtz KIUC - witness Rosenberger Note: Sacre, Candace H	Those all the outages?
9:56:20 AM	Atty Kurtz KIUC - witness Rosenberger Note: Sacre, Candace H	What is observed shutdown?
9:56:29 AM	Atty Kurtz KIUC - witness Rosenberger Note: Sacre, Candace H	Why not operate it if Mitchell 2 generating at \$20 MWh when market purchases in 50s?
9:56:48 AM	Atty Kurtz KIUC - witness Rosenberger Note: Sacre, Candace H	Bid in cost, PJM dispatches to plants based upon cost AEP sets?
9:57:08 AM	Atty Kurtz KIUC - witness Stegall Note: Sacre, Candace H	PJM dispatches every power plant but dispatches least cost to most based on cost information provided by generation owners?
9:57:28 AM	Atty Kurtz KIUC - witness Stegall Note: Sacre, Candace H	Bid in higher than actual cost if generation owner?

9:57:45 AM	Atty Kurtz KIUC - witness Stegall Note: Sacre, Candace H	Trying conserve coal in October at Mitchell, correct, testify in West Virginia in March hearing?
9:58:10 AM	Atty Kurtz KIUC - witness Rosenberger Note: Sacre, Candace H	Who is Mitchell?
9:58:27 AM	Atty Overstreet Kentucky Power Note: Sacre, Candace H	Perhaps Mr. Dial could respond.
9:58:37 AM	Atty Kurtz KIUC - witness Dial Note: Sacre, Candace H	Not remember getting close to ten-day fuel storage threshold PJM set have to stop running?
9:58:59 AM	Atty Kurtz KIUC - witness Dial Note: Sacre, Candace H	Know if AEP conserving coal at Mitchell in October?
9:59:12 AM	Atty Kurtz KIUC - witness Dial Note: Sacre, Candace H	Page 3 forced outage schedule, prepared based upon company's responses, added up planned maintenance and forced outages, how many hours each plant off October, Big Sandy off all 744 hours, zero capacity factor, that equates?
9:59:47 AM	Atty Kurtz KIUC - witness Dial Note: Sacre, Candace H	Rockport 1 and 2 out 744 hours of month?
9:59:58 AM	Atty Kurtz KIUC - witness Rosenberger Note: Sacre, Candace H	Mitchell had series of forced, planned, and scheduled outages, out 629 hours during month?
10:00:10 AM	Atty Kurtz KIUC - witness Rosenberger Note: Sacre, Candace H	Mitchell 2 out 240 hours in month?
10:00:50 AM	Atty Kurtz KIUC - witness Stegall Note: Sacre, Candace H	Attached pages 5-35, day ahead LMP in PJM, every hour of month market price higher than Mitchell 2 fuel cost, three hours below on page 35, PJM not telling you not run if generation costs that much lower than market, not order reserve shutdown?
10:02:04 AM	Atty Kurtz KIUC - witness Stegall Note: Sacre, Candace H	Page 4 of exhibit, Mitchell 1 only ran 63 percent hours available and Mitchell 2 only ran 67 percent hours available, surprise you?
10:02:36 AM	Atty Kurtz KIUC - witness Stegall Note: Sacre, Candace H	That output factor?
10:02:44 AM	Atty Kurtz KIUC - witness Stegall Note: Sacre, Candace H	How many hours run versus how many hours available, start from top?
10:03:06 AM	Atty Kurtz KIUC - witness Stegall Note: Sacre, Candace H	The generation cost Mitchell 1 at \$30 Mitchell 2 at \$20.74?
10:03:21 AM	Atty Kurtz KIUC - witness Stegall Note: Sacre, Candace H	Then have hours off line, next set of numbers?
10:03:38 AM	Atty Kurtz KIUC - witness Rosenberger Note: Sacre, Candace H	Made assumption hours not off line available run when not out, available hours Mitchell 2 were 504 hours in month, reasonable assumption?
10:04:15 AM	Atty Kurtz KIUC - witness Stegall Note: Sacre, Candace H	Mitchell 2 available 504 hours, could have generated 199,000 MWh, only generated 133,000 MWh, why not run \$20 unit when buying in fifties?
10:04:55 AM	Atty Kurtz KIUC - witness Stegall Note: Sacre, Candace H	PJM dispatches based upon cost bid in by AEP Service Corps?
10:05:07 AM	Atty Kurtz KIUC - witness Stegall Note: Sacre, Candace H	Think PJM not run \$20 unit if LMP at least \$10 MWh higher than twenty every hour of month?

10:05:30 AM	Atty Kurtz KIUC - witness Stegall Note: Sacre, Candace H	Trying to understand why AEP left 66,000 MWh Mitchell 2 on table?
10:05:40 AM	Atty Overstreet Kentucky Power Note: Sacre, Candace H	Mr. Kurtz testifying. (Click on link for further comment.)
10:07:30 AM	Commissioner Regan Note: Sacre, Candace H	Sustain objection, data request. (Click on link for further comments.)
10:08:09 AM	Atty Kurtz KIUC Note: Sacre, Candace H	Think this is KIUC 6.
10:08:45 AM	Atty Kurtz KIUC - witness Stegall Note: Sacre, Candace H	Recognize this as company response to KIUC data request, first two pages?
10:08:52 AM	Atty Kurtz KIUC - witness Stegall Note: Sacre, Candace H	Asked in (e), please explain why, read answer on page 2?
10:09:26 AM	Atty Kurtz KIUC - witness Stegall Note: Sacre, Candace H	and Massie Recognize Big Sandy not combined cycle?
10:09:44 AM	Atty Kurtz KIUC - witness Massie Note: Sacre, Candace H	Not combined cycle?
10:09:48 AM	Atty Kurtz KIUC - witness Stegall Note: Sacre, Candace H	Recall case company asked permission convert Big Sandy 1 from coal to natural gas?
10:10:09 AM	Atty Kurtz KIUC - witness Stegall Note: Sacre, Candace H	Page 3 of exhibit, Walton on behalf of Kentucky Power, was managing director of projects, know him?
10:10:29 AM	Atty Kurtz KIUC - witness Stegall Note: Sacre, Candace H	Case No. 2013-00430 and Walton page 4 testified expected peaking operation of converted facility, once convert from coal to gas be peaking unit?
10:11:11 AM	Atty Kurtz KIUC - witness Stegall Note: Sacre, Candace H	See where says due to fluctuating natural gas requirements associated with expected peaking operation of converted facility?
10:11:29 AM	Atty Kurtz KIUC - witness Stegall Note: Sacre, Candace H	Page 6, Staff asked bottom page 8 continuing page 9 Weaver direct testimony discusses gas needs of Unit 1 when operating as peaking unit, go on and answer questions, indicate Staff thought be operated as peaking unit?
10:11:55 AM	Atty Overstreet Kentucky Power Note: Sacre, Candace H	Object. (Click on link for further comments.)
10:11:59 AM	Commissioner Regan Note: Sacre, Candace H	Sustained.
10:12:02 AM	Atty Kurtz KIUC Note: Sacre, Candace H	Page 8 of exhibit, redacted version, see title of document provided by AEP, ask company provide unredacted analysis?
10:12:48 AM	Atty Overstreet Kentucky Power Note: Sacre, Candace H	Can provide that. (Click on link for further comments.)
10:13:27 AM	Atty Kurtz KIUC - witness Massie Note: Sacre, Candace H	Start-up costs, realistic start and stop every hour of year?
10:13:55 AM	Atty Kurtz KIUC - witness Massie Note: Sacre, Candace H	Reasonable assume gas combustion turbine peaking unit start and stop 8,760 times per year?
10:14:06 AM	Atty Kurtz KIUC - witness Massie Note: Sacre, Candace H	What be average run time annual period for combustion turbine?
10:14:20 AM	Atty Kurtz KIUC - witness Massie Note: Sacre, Candace H	Own gas peaking plant Ceredo in West Virginia?

10:14:27 AM	Atty Kurtz KIUC - witness Massie Note: Sacre, Candace H	Several in Kentucky?
10:14:44 AM	Atty Kurtz KIUC - witness Massie Note: Sacre, Candace H	East Kentucky has three Bluegrass units simple cycle combustion turbines, be reasonable proxies?
10:15:10 AM	Atty Kurtz KIUC Note: Sacre, Candace H	No more questions.
10:15:17 AM	Commissioner Regan Note: Sacre, Candace H	Staff, cross examination?
10:15:43 AM	Executive Advisor Attorney Pinney Note: Sacre, Candace H	PSC - witness Stegall Cross Examination. Clarify economic purchase forced outage, purchase power to replace lost generation, any purchase power costs over PUE deemed non-economic purchase?
10:16:39 AM	Executive Advisor Attorney Pinney Note: Sacre, Candace H	PSC - witness Stegall Explain how calculated when looking at cost for forced outage?
10:17:17 AM	Executive Advisor Attorney Pinney Note: Sacre, Candace H	PSC - witness Stegall In that situation, non-economic purchase not recovered through FAC?
10:17:28 AM	Executive Advisor Attorney Pinney Note: Sacre, Candace H	PSC - witness Bishop Recovered anywhere else?
10:17:44 AM	Executive Advisor Pinney Note: Sacre, Candace H	PSC - witness Rosenberger and Massie Kentucky Power encountered difficulties, supply/equipment constraints related to COVID-19, detail, operation of units?
10:19:27 AM	Executive Advisor Attorney Pinney Note: Sacre, Candace H	PSC - witness Rosenberger and Massie Not affected ability to run but supply chain issues continuing?
10:20:13 AM	Executive Advisor Attorney Pinney Note: Sacre, Candace H	PSC - witness Dial Yes, please?
10:20:24 AM	Executive Advisor Attorney Pinney Note: Sacre, Candace H	PSC - witness Dial With regard to suppliers, cost problem or supply problem or both?
10:20:51 AM	Executive Advisor Attorney Pinney Note: Sacre, Candace H	PSC - witness Dial Problems speaking of with suppliers, affect Mitchell?
10:21:18 AM	Executive Advisor Attorney Pinney Note: Sacre, Candace H	PSC - witness Dial Talking about fuel procurement practices, spot purchase, concerns with reliability?
10:22:34 AM	Executive Advisor Attorney Pinney Note: Sacre, Candace H	PSC - witness Dial Assume have fuel under contract, contracts being met, once expire and renegotiate looking to new contracts?
10:23:17 AM	Executive Advisor Attorney Pinney Note: Sacre, Candace H	PSC - witness Dial Getting at, contracting versus spot philosophy, AEP at large?
10:23:41 AM	Executive Advisor Attorney Pinney Note: Sacre, Candace H	PSC - witness Dial RFPs issued, any difficulties getting takers?
10:25:21 AM	Executive Advisor Attorney Pinney Note: Sacre, Candace H	PSC - witness Dial All things together caused issue, caused shift in philosophy coal procurement practices for Kentucky Power?
10:25:47 AM	Executive Advisor Attorney Pinney Note: Sacre, Candace H	PSC - witness Dial Generating stations, above flood lines?
10:26:00 AM	Executive Advisor Attorney Pinney Note: Sacre, Candace H	PSC - witness Dial and Rosenberger Concerns of flooding?
10:26:50 AM	Executive Advisor Attorney Pinney Note: Sacre, Candace H	PSC - witness Rosenberger and Massie No danger to physical plant?
10:27:23 AM	Executive Advisor Attorney Pinney Note: Sacre, Candace H	PSC - witness Dial Response, Staff First, Item 3, indicated Kentucky Power not able meet Mitchell low sulphur target/coal inventory, current state inventory low and high sulphur Mitchell, meet target?

10:28:16 AM Executive Advisor Attorney Pinney PSC - witness Dial  
Note: Sacre, Candace H Talking about FAC rate sheet, way calculated estimated fuel costs prior month adjusted following month, explain how Kentucky Power determines estimated fuel costs related to company generation, how reaches estimates?

10:29:48 AM Executive Advisor Attorney Pinney PSC - witness Bishop  
Note: Sacre, Candace H Kurtz picked over most questions regarding PUE, for purchased power any costs disallowed?

10:30:31 AM Executive Advisor Attorney Pinney PSC - witness Bishop  
Note: Sacre, Candace H PPA explain how works accounting basis?

10:31:12 AM Executive Advisor Attorney Pinney PSC - witness Bishop  
Note: Sacre, Candace H Rider on bill or adjustment to base rates?

10:31:24 AM Executive Advisor Attorney Pinney PSC - witness Bishop  
Note: Sacre, Candace H Everything not recovered through FAC bundled up and filed and next month adjustment for year going forward?

10:31:44 AM Atty Kurtz KIUC - witness Bishop  
Note: Sacre, Candace H Recross Examination. Did you mean forced outage disallowance from fuel adjustment gets recovered in PPA, PUE disallowance also recovered in PPA?

10:32:15 AM Executive Advisor Attorney Pinney PSC  
Note: Sacre, Candace H Appreciate answer in post-hearing data request.

10:32:16 AM POST-HEARING DATA REQUEST  
Note: Sacre, Candace H ATTY KURTZ KIUC - WITNESS BISHOP  
Note: Sacre, Candace H FORCED OUTAGE DISALLOWANCE FROM FUEL ADJUSTMENT RECOVERED IN PPA, MEAN PUE DISALLOWANCE ALSO RECOVERED IN PPA

10:32:30 AM Executive Advisor Attorney Pinney PSC  
Note: Sacre, Candace H No further.

10:32:40 AM Commissioner Regan  
Note: Sacre, Candace H Redirect?

10:32:47 AM Atty Overstreet Kentucky Power - witness Bishop  
Note: Sacre, Candace H Redirect Examination. Turn to KIUC 1, page 12, Commission Oct 3 2002 Order, Case No. 2000-00495-B, have that?

10:33:30 AM Atty Overstreet Kentucky Power - witness Bishop  
Note: Sacre, Candace H Kurtz asked read highlighted portions, remember that?

10:33:40 AM Atty Overstreet Kentucky Power - witness Bishop  
Note: Sacre, Candace H Could you read unhighlighted portions of paragraph?

10:34:40 AM Atty Overstreet Kentucky Power - witness Bishop  
Note: Sacre, Candace H Prior page 11, Kurtz second paragraph sentence highlighted, read that?

10:35:06 AM Atty Overstreet Kentucky Power - witness Bishop  
Note: Sacre, Candace H Read Footnote 3 that follows?

10:36:30 AM Atty Overstreet Kentucky Power - witness Stegall  
Note: Sacre, Candace H KIUC 2, Kurtz asked about Hour 18, first highlighted row, remember that?

10:36:46 AM Atty Overstreet Kentucky Power - witness Stegall  
Note: Sacre, Candace H Referred to PUE value of \$71.172?

10:37:00 AM Atty Overstreet Kentucky Power - witness Stegall  
Note: Sacre, Candace H PUE value apply in that hour?

10:37:12 AM Commissioner Regan  
Note: Sacre, Candace H Recross?

10:37:19 AM Atty Kurtz KIUC - witness Stegall  
Note: Sacre, Candace H Recross Examination. Last answer, \$71 PUE cap did apply but \$66.50 purchase below so whole purchase recovered?

10:37:36 AM	Commissioner Regan Note: Sacre, Candace H	Staff?
10:37:40 AM	Executive Advisor Attorney Pinney Note: Sacre, Candace H	PSC - witness Stegall Recross Examination. Prior to 2017, start-up costs added to PUE, PUE calculated using formula?
10:38:24 AM	Executive Advisor Attorney Pinney Note: Sacre, Candace H	PSC - witness Stegall When amended in 2017, did that add about \$33 to PUE calculation?
10:38:50 AM	Executive Advisor Attorney Pinney Note: Sacre, Candace H	PSC - witness Stegall Once again, look at cell when calculating PUE on spreadsheets Kentucky Power provided, does have formula plus that \$33.48, subtracting \$33.48 from PUE, would that PUE be below other costs of other generating units particularly Big Sandy?
10:39:31 AM	Executive Advisor Attorney Pinney Note: Sacre, Candace H	PSC - witness Stegall Thinking about PUE in particular month, possible subtract \$33.48 from it and compare to Big Sandy running at same time, PUE could be lower than Big Sandy?
10:40:27 AM	Atty Kurtz KIUC Note: Sacre, Candace H	Move admission KIUC Exhibits 1 through 6.
10:40:33 AM	Atty Overstreet Kentucky Power Note: Sacre, Candace H	Object to extent involve calculations not in record. (Click on link for further comments.)
10:40:37 AM	KIUC HEARING EXHIBIT 1 Note: Sacre, Candace H Note: Sacre, Candace H	ATTY KURTZ KIUC - WITNESS STEGALL 807 KAR 5:056 FUEL ADJUSTMENT CLAUSE AND RELATED DOCUMENTS PROVIDED BY KIUC
10:40:38 AM	KIUC HEARING EXHIBIT 2 Note: Sacre, Candace H Note: Sacre, Candace H	ATTY KURTZ KIUC - WITNESS STEGALL SPREADSHEET PREPARED BY KIUC
10:40:39 AM	KIUC HEARING EXHIBIT 3 Note: Sacre, Candace H Note: Sacre, Candace H	ATTY KURTZ KIUC - WITNESS STEGALL AVERAGE AND MAXIMUM MARKET PURCHASES (NON-ROCKPORT) ASSIGNED TO NATIVE LOAD NOT DUE TO FORCED OUTAGES
10:40:40 AM	KIUC HEARING EXHIBIT 4 Note: Sacre, Candace H Note: Sacre, Candace H	ATTY KURTZ KIUC - WITNESS STEGALL KENTUCKY POWER COMPANY SELECTED DATA OCTOBER 2021, SEPTEMBER 2021, AUGUST 2021, JULY 2021, JUNE 2021, AND MAY 2021
10:40:41 AM	KIUC HEARING EXHIBIT 5 Note: Sacre, Candace H Note: Sacre, Candace H	ATTY KURTZ KIUC - WITNESS ROSENBERGER FUEL ADJUSTMENT CASE NO. 2022-00036 GENERATING UNIT OUTAGES MAY 1 2021 - OCTOBER 31 2021
10:40:42 AM	KIUC HEARING EXHIBIT 6 Note: Sacre, Candace H Note: Sacre, Candace H	ATTY KURTZ KIUC - WITNESS STEGALL KPSC CASE NO. 2022-00036 KIUC FIRST SET OF DATA REQUESTS DATED MAY 9 2022
10:41:42 AM	Commissioner Regan Note: Sacre, Candace H	Briefing schedule and post-hearing data requests. (Click on link for further comments.)
10:44:43 AM	Commissioner Regan Note: Sacre, Candace H	Witnesses excused, case adjourned.
10:44:49 AM	Commissioner Regan Note: Sacre, Candace H	Ten-minute break, back at five to 11.
10:45:00 AM	Session Paused	
10:58:37 AM	Session Resumed	

10:58:38 AM	Commissioner Regan Note: Sacre, Candace H	Call Case 2022-00037, East Kentucky Power Cooperative.
10:58:43 AM	Commissioner Regan Note: Sacre, Candace H	Entry of appearance of counsel.
10:58:48 AM	Atty Honaker East Kentucky Power Note: Sacre, Candace H	Allyson Honaker, on behalf of EKPC.
10:58:53 AM	Executive Advisor Attorney Pinney PSC Note: Sacre, Candace H	JEB Pinney, two members of Staff with me, John Rogness and Christian Everly.
10:58:55 AM	Camera Lock Deactivated	
10:58:58 AM	Commissioner Regan Note: Sacre, Candace H	Public notice. (Click on link for further comments.)
10:59:06 AM	Commissioner Regan Note: Sacre, Candace H	Outstanding motions. (Click on link for further comments.)
10:59:15 AM	Commissioner Regan Note: Sacre, Candace H	Public comments. (Click on link for further comments.)
10:59:53 AM	Commissioner Regan Note: Sacre, Candace H	Call witnesses.
11:00:10 AM	Commissioner Regan Note: Sacre, Candace H	Witnesses sworn.
11:00:28 AM	Atty Honaker East Kentucky Power - witness Horn Note: Sacre, Candace H	Direct Examination. Name, title, and business address?
11:00:39 AM	Atty Honaker East Kentucky Power - witness Horn Note: Sacre, Candace H	Cause responses be filed?
11:00:44 AM	Atty Honaker East Kentucky Power - witness Horn Note: Sacre, Candace H	Additions or corrections?
11:00:47 AM	Atty Honaker East Kentucky Power - witness Horn Note: Sacre, Candace H	Ask same questions, responses be same?
11:00:52 AM	Atty Honaker East Kentucky Power - witness Horn Note: Sacre, Candace H	Intent to incorporate responses into record?
11:00:57 AM	Atty Honaker East Kentucky Power - witness Johnson Note: Sacre, Candace H	Direct Examination. Name, title, and business address?
11:01:10 AM	Atty Honaker East Kentucky Power - witness Johnson Note: Sacre, Candace H	Cause responses be filed?
11:01:15 AM	Atty Honaker East Kentucky Power - witness Johnson Note: Sacre, Candace H	Additions or corrections?
11:01:19 AM	Atty Honaker East Kentucky Power - witness Johnson Note: Sacre, Candace H	Ask same questions, responses be same?
11:01:24 AM	Atty Honaker East Kentucky Power - witness Johnson Note: Sacre, Candace H	Intent to incorporate responses into record?
11:01:29 AM	Atty Honaker East Kentucky Power - witness Tucker Note: Sacre, Candace H	Direct Examination. Name, business address, title?
11:01:41 AM	Atty Honaker East Kentucky Power - witness Tucker Note: Sacre, Candace H	Cause responses be filed?
11:01:46 AM	Atty Honaker East Kentucky Power - witness Tucker Note: Sacre, Candace H	Additions or corrections?
11:01:49 AM	Atty Honaker East Kentucky Power - witness Tucker Note: Sacre, Candace H	Ask same questions, responses be same?
11:01:54 AM	Atty Honaker East Kentucky Power - witness Tucker Note: Sacre, Candace H	Intent to incorporate responses into record?
11:01:58 AM	Atty Honaker East Kentucky Power - witness Carpenter Note: Sacre, Candace H	Direct Examination. Name, title, and business address?
11:02:08 AM	Atty Honaker East Kentucky Power - witness Carpenter Note: Sacre, Candace H	Cause responses be filed?

11:02:13 AM	Atty Honaker East Kentucky Power - witness Carpenter Note: Sacre, Candace H	Additions or corrections?
11:02:17 AM	Atty Honaker East Kentucky Power - witness Carpenter Note: Sacre, Candace H	Ask same questions, responses be same?
11:02:24 AM	Atty Honaker East Kentucky Power - witness Carpenter Note: Sacre, Candace H	Intent to incorporate responses into record?
11:02:31 AM	Commissioner Regan Note: Sacre, Candace H	Staff?
11:02:35 AM	Executive Advisor Attorney Pinney Note: Sacre, Candace H	PSC - witness Carpenter Cross Examination. For disallowed fuel or power purchase costs, other mechanisms to recover disallowed costs?
11:03:18 AM	Executive Advisor Attorney Pinney Note: Sacre, Candace H	PSC - witness Carpenter In here for previous hearing, Kentucky Power FAC?
11:03:26 AM	Executive Advisor Attorney Pinney Note: Sacre, Candace H	PSC - witness Carpenter Hear discussion about PPA automatic adjustment mechanism for costs not recovered through FAC, specifically approved by Commission in rate case?
11:03:58 AM	Executive Advisor Attorney Pinney Note: Sacre, Candace H	PSC - witness Horn Impact of COVID-19 acquisition of fuel supply to equipment maintenance and personnel and other miscellaneous effects, testify to effects on categories?
11:04:55 AM	Executive Advisor Attorney Pinney Note: Sacre, Candace H	PSC - witness Johnson To date or through review period?
11:05:53 AM	Executive Advisor Attorney Pinney Note: Sacre, Candace H	PSC - witness Johnson Any effects on personnel, running of plants?
11:06:12 AM	Executive Advisor Attorney Pinney Note: Sacre, Candace H	PSC - witness Horn Fuel procurement, Cooper spot purchases for review period?
11:06:34 AM	Executive Advisor Attorney Pinney Note: Sacre, Candace H	PSC - witness Horn All Mitchell units third of purchases were spot versus contract?
11:06:48 AM	Executive Advisor Attorney Pinney Note: Sacre, Candace H	PSC - witness Horn Was it Spurlock 1 and 2, 33 percent maybe 36 percent were spot, 3 and 4 of Spurlock over 40 percent spot versus contract?
11:07:08 AM	Executive Advisor Attorney Pinney Note: Sacre, Candace H	PSC - witness Horn Not know if in hearing earlier, with regard Spurlock typical mix of spot versus contract?
11:07:34 AM	Executive Advisor Attorney Pinney Note: Sacre, Candace H	PSC - witness Horn Cooper, burning lot more, not have sufficient supply to make spot purchases or long-term contracts?
11:08:13 AM	Executive Advisor Attorney Pinney Note: Sacre, Candace H	PSC - witness Horn Different transportation issues with Cooper than with Spurlock?
11:08:38 AM	Executive Advisor Attorney Pinney Note: Sacre, Candace H	PSC - witness Horn Present problems for Cooper?
11:09:01 AM	Executive Advisor Attorney Pinney Note: Sacre, Candace H	PSC - witness Horn Has relationship with suppliers changed over time?
11:09:48 AM	Executive Advisor Attorney Pinney Note: Sacre, Candace H	PSC - witness Horn Seen similar effect long-term contracts, RFPs, same responses used to?
11:10:08 AM	Executive Advisor Attorney Pinney Note: Sacre, Candace H	PSC - witness Horn East Kentucky considered changing philosophy lengths of contract coal?
11:10:42 AM	Executive Advisor Attorney Pinney Note: Sacre, Candace H	PSC - witness Horn How coal inventories now?
11:11:03 AM	Executive Advisor Attorney Pinney Note: Sacre, Candace H	PSC - witness Horn In responses reference to force majeure clause Foresight Coal invoked in contract with EKPC, Sugar Camp Mine fire, status now?

11:11:43 AM	Executive Advisor Attorney Pinney PSC - witness Horn Note: Sacre, Candace H	Accurate say coal contracts East Kentucky has with Foresight not limited to Sugar Camp Mines?
11:12:00 AM	Executive Advisor Attorney Pinney PSC - witness Horn Note: Sacre, Candace H	Anticipated Foresight meet tonnage requirements?
11:12:16 AM	Executive Advisor Attorney Pinney PSC - witness Horn Note: Sacre, Candace H	Outside review period, missing tonnage affect decisions to burn at Spurlock or not material?
11:12:45 AM	Executive Advisor Attorney Pinney PSC - witness Horn Note: Sacre, Candace H	Cooper, East Kentucky Power winter peaking, looking for long-term contract for purchasing at Cooper?
11:13:21 AM	Executive Advisor Attorney Pinney PSC - witness Horn Note: Sacre, Candace H	Contracts, one oral or verbal solicitation listed, get put down into contract and filed?
11:14:03 AM	Executive Advisor Attorney Pinney PSC - witness Horn Note: Sacre, Candace H	Bid analysis, way works East Kentucky proprietary system takes into account factors all-in cost?
11:14:41 AM	Executive Advisor Attorney Pinney PSC - witness Horn Note: Sacre, Candace H	Walk through factors and how might work, evaluate bids and factors are how arrive at cost and whether or not take that?
11:15:40 AM	Executive Advisor Attorney Pinney PSC - witness Horn Note: Sacre, Candace H	Just probably scratching surface of real details might get, that's high level?
11:15:51 AM	Executive Advisor Attorney Pinney PSC - witness Horn Note: Sacre, Candace H	If appropriate, take into account or not take into account applicable severance tax?
11:16:07 AM	Executive Advisor Attorney Pinney PSC - witness Horn Note: Sacre, Candace H	Clean coal tax credits, state or federal?
11:16:25 AM	Executive Advisor Attorney Pinney PSC - witness Horn Note: Sacre, Candace H	\$2 credit per ton?
11:16:30 AM	Executive Advisor Attorney Pinney PSC - witness Horn Note: Sacre, Candace H	Factored in, too, looking at analysis for Spurlock 3 and 4 would subtract that \$2 as well?
11:16:43 AM	Executive Advisor Attorney Pinney PSC - witness Horn Note: Sacre, Candace H	Spurlock 3 and 4 have fluidized beds?
11:16:46 AM	Executive Advisor Attorney Pinney PSC - witness Horn Note: Sacre, Candace H	Besides coal, during review period, any other material burned there?
11:17:00 AM	Executive Advisor Attorney Pinney PSC - witness Horn Note: Sacre, Candace H	Something frequently burned there, or what runs decision to burn tire-derived fuel or other, correct fluidized beds burn other types fuel, too, switch grass and biomass?
11:17:26 AM	Executive Advisor Attorney Pinney PSC - witness Horn Note: Sacre, Candace H	What drives decision burn anything but coal?
11:17:42 AM	Executive Advisor Attorney Pinney PSC - witness Horn Note: Sacre, Candace H	Burn rate, heat, cost, how compare to coal?
11:18:25 AM	Executive Advisor Attorney Pinney PSC Note: Sacre, Candace H	No further.
11:18:27 AM	Commissioner Regan Note: Sacre, Candace H	Redirect? (Click on link for further comments.)
11:18:33 AM	Commissioner Regan Note: Sacre, Candace H	Recross? (Click on link for further comments.)
11:18:36 AM	Commissioner Regan Note: Sacre, Candace H	Post-hearing data requests. (Click on link for further comments.)
11:18:46 AM	Commissioner Regan Note: Sacre, Candace H	Witnesses excused and case adjourned.

11:19:10 AM	Commissioner Regan Note: Sacre, Candace H	Next call Case No. 2022-00038 Kentucky Utilities and 2022-00039 Louisville Gas and Electric.
11:19:48 AM	Commissioner Regan Note: Sacre, Candace H	Entry of appearance of counsel.
11:19:51 AM	Atty Sturgeon KU/LG&E Note: Sacre, Candace H	Allyson Sturgeon, appearing on behalf of Louisville Gas & Electric Company and Kentucky Utilities.
11:20:04 AM	Executive Advisor Attorney Pinney PSC Note: Sacre, Candace H	JEB Pinney, Commission Staff, with me John Rogness and Christian Everly.
11:20:17 AM	Commissioner Regan Note: Sacre, Candace H	Public notice. (Click on link for further comments.)
11:20:25 AM	Commissioner Regan Note: Sacre, Candace H	Outstanding motions. (Click on link for further comments.)
11:20:42 AM	Commissioner Regan Note: Sacre, Candace H	Public comments. (Click on link for further comments.)
11:21:11 AM	Commissioner Regan Note: Sacre, Candace H	Call witnesses.
11:21:38 AM	Atty Sturgeon KU/LG&E - witness Billiter Note: Sacre, Candace H	Direct Examination. Name, title, and business address?
11:21:59 AM	Atty Sturgeon KU/LG&E - witness Billiter Note: Sacre, Candace H	Cause be filed responses?
11:22:11 AM	Atty Sturgeon KU/LG&E - witness Billiter Note: Sacre, Candace H	Ask same questions, answers remain same?
11:22:21 AM	Atty Sturgeon KU/LG&E - witness Fackler Note: Sacre, Candace H	Direct Examination. Name, title, and business address?
11:22:36 AM	Atty Sturgeon KU/LG&E - witness Fackler Note: Sacre, Candace H	Cause be filed responses?
11:22:42 AM	Atty Sturgeon KU/LG&E - witness Fackler Note: Sacre, Candace H	Ask same questions, answers remain same?
11:22:46 AM	Atty Sturgeon KU/LG&E - witness Schram Note: Sacre, Candace H	Direct Examination. Name, title, and business address?
11:23:00 AM	Atty Sturgeon KU/LG&E - witness Schram Note: Sacre, Candace H	Cause be filed responses?
11:23:07 AM	Atty Sturgeon KU/LG&E - witness Schram Note: Sacre, Candace H	Ask same questions, answers remain same?
11:23:17 AM	Atty Sturgeon KU/LG&E - witness Drake Note: Sacre, Candace H	Direct Examination. Name, title, and business address?
11:23:21 AM	Atty Sturgeon KU/LG&E - witness Drake Note: Sacre, Candace H	Cause be filed responses?
11:23:27 AM	Atty Sturgeon KU/LG&E - witness Drake Note: Sacre, Candace H	Ask those questions today, answers remain same?
11:23:31 AM	Atty Sturgeon KU/LG&E - witness Wilson Note: Sacre, Candace H	Direct Examination. Name, title, and business address?
11:23:46 AM	Atty Sturgeon KU/LG&E - witness Wilson Note: Sacre, Candace H	Cause be filed responses?
11:23:55 AM	Atty Sturgeon KU/LG&E - witness Wilson Note: Sacre, Candace H	Ask same questions today, answers remain same?
11:24:00 AM	Commissioner Regan Note: Sacre, Candace H	Witnesses are sworn.
11:24:17 AM	Commissioner Regan Note: Sacre, Candace H	Cross examination?

11:24:26 AM	Executive Advisor Attorney Pinney PSC - witness Fackler Note: Sacre, Candace H	Cross Examination. Costs disallowed or not recovered through FAC, costs recovered elsewhere?
11:25:10 AM	Executive Advisor Attorney Pinney PSC - witness Fackler Note: Sacre, Candace H	Subject to Commission review and approval?
11:25:21 AM	Executive Advisor Attorney Pinney PSC - witness Billiter and Drake Note: Sacre, Candace H	Impact COVID on fuel procurement, maintenance, any effects had with regard to that?
11:26:42 AM	Executive Advisor Attorney Pinney PSC - witness Drake Note: Sacre, Candace H	Any outages might have gone on longer than anticipated?
11:27:00 AM	Executive Advisor Attorney Pinney PSC - witness Drake Note: Sacre, Candace H	Equipment and like, experiencing supply chain problems, anticipate adequate stock, anticipate shortage some equipment if needed?
11:27:38 AM	Atty Sturgeon KU/LG&E Note: Sacre, Candace H	Clarify, question refers just to generation? (Click on link for further comments.)
11:28:05 AM	Executive Advisor Attorney Pinney PSC - witness Billiter Note: Sacre, Candace H	Here when asking East Kentucky Power problems getting coal from Foresight, have contract with Foresight?
11:28:44 AM	Executive Advisor Attorney Pinney PSC - witness Billiter Note: Sacre, Candace H	What effects of force majeure at Sugar Camp?
11:29:25 AM	Executive Advisor Attorney Pinney PSC - witness Billiter Note: Sacre, Candace H	Said another supplier affected?
11:29:57 AM	Executive Advisor Attorney Pinney PSC - witness Billiter Note: Sacre, Candace H	Effects of force majeure material effect on supplier and/or decisions or affect running of generation?
11:31:26 AM	Executive Advisor Attorney Pinney PSC - witness Billiter Note: Sacre, Candace H	When said contract during force majeure allows purchaser to make up tonnage, from supplier, perform as purchaser under contract later on?
11:32:23 AM	Executive Advisor Attorney Pinney PSC - witness Billiter Note: Sacre, Candace H	Sugar Camp up 50 percent, related to environmental concerns draining second line?
11:33:09 AM	Executive Advisor Attorney Pinney PSC - witness Billiter Note: Sacre, Candace H	At moment, not having material effect?
11:33:24 AM	Executive Advisor Attorney Pinney PSC - witness Billiter Note: Sacre, Candace H	Questions about changes in philosophy, fuel procurement, contracts, any material changes long-term contracts to more spot purchases, spot purchases to long-term contracts, or roughly same?
11:35:11 AM	Executive Advisor Attorney Pinney PSC - witness Billiter Note: Sacre, Candace H	Fewer responders to requests for proposals for coal?
11:36:40 AM	Executive Advisor Attorney Pinney PSC - witness Billiter Note: Sacre, Candace H	Changes in relationship with coal providers, seen similar shift?
11:39:49 AM	Executive Advisor Attorney Pinney PSC Note: Sacre, Candace H	Follow up with post-hearing data requests. (Click on link for further comments.)
11:40:20 AM	Commissioner Regan Note: Sacre, Candace H	Redirect?
11:40:27 AM	Commissioner Regan Note: Sacre, Candace H	Witnesses excused and case adjourned.
11:41:02 AM	Commissioner Regan Note: Sacre, Candace H	Call Case No. 2022-00040, Duke Energy Kentucky.
11:41:46 AM	Camera Lock PTZ Activated	
11:41:54 AM	Camera Lock Deactivated	

11:42:04 AM	Commissioner Regan Note: Sacre, Candace H	Entry of appearance of counsel.
11:42:21 AM	Atty Vaysman Duke Kentucky Note: Sacre, Candace H	Larisa Vaysman, appearing for Duke Energy Kentucky. (Click on link for further comments.)
11:42:29 AM	Video Conference Deactivated	
11:42:43 AM	Executive Advisor Attorney Pinney PSC Note: Sacre, Candace H	JEB Pinney, two members Commission Staff with me, John Rogness and Christian Everly.
11:42:49 AM	Commissioner Regan Note: Sacre, Candace H	Public notice. (Click on link for further comments.)
11:42:56 AM	Commissioner Regan Note: Sacre, Candace H	Outstanding motions. (Click on link for further comments.)
11:43:05 AM	Commissioner Regan Note: Sacre, Candace H	Public comments. (Click on link for further comments.)
11:43:48 AM	Atty Vaysman Duke Kentucky - witness Swez Note: Sacre, Candace H	Direct Examination. Name, title, and business address?
11:44:03 AM	Atty Vaysman Duke Kentucky - witness Swez Note: Sacre, Candace H	Caused responses be filed?
11:44:08 AM	Atty Vaysman Duke Kentucky - witness Swez Note: Sacre, Candace H	Any corrections?
11:44:12 AM	Atty Vaysman Duke Kentucky - witness Swez Note: Sacre, Candace H	Asked same questions today, responses be same?
11:44:19 AM	Atty Vaysman Duke Kentucky - witness Daniel Note: Sacre, Candace H	Direct Examination. Name, title, and business address?
11:44:35 AM	Atty Vaysman Duke Kentucky - witness Daniel Note: Sacre, Candace H	Cause responses be filed?
11:44:41 AM	Atty Vaysman Duke Kentucky - witness Daniel Note: Sacre, Candace H	Any corrections?
11:44:44 AM	Atty Vaysman Duke Kentucky - witness Daniel Note: Sacre, Candace H	Asked same questions, answers remain same?
11:44:49 AM	Atty Vaysman Duke Kentucky - witness Hughes Note: Sacre, Candace H	Direct Examination. Name, title, and business address?
11:45:06 AM	Atty Vaysman Duke Kentucky - witness Hughes Note: Sacre, Candace H	Cause responses be filed?
11:45:11 AM	Atty Vaysman Duke Kentucky - witness Hughes Note: Sacre, Candace H	Any corrections?
11:45:15 AM	Atty Vaysman Duke Kentucky - witness Hughes Note: Sacre, Candace H	Asked same questions today, responses be same?
11:45:21 AM	Atty Vaysman Duke Kentucky - witness Miller Note: Sacre, Candace H	Direct Examination. Name, title, and business address?
11:45:39 AM	Atty Vaysman Duke Kentucky - witness Miller Note: Sacre, Candace H	Cause responses be filed?
11:45:44 AM	Atty Vaysman Duke Kentucky - witness Miller Note: Sacre, Candace H	Any corrections?
11:45:48 AM	Atty Vaysman Duke Kentucky - witness Miller Note: Sacre, Candace H	Asked same questions today, responses be same?
11:45:55 AM	Atty Vaysman Duke Kentucky - witness Riggins Note: Sacre, Candace H	Direct Examination. Name, title, and business address?
11:46:09 AM	Atty Vaysman Duke Kentucky - witness Riggins Note: Sacre, Candace H	Cause responses be filed?
11:46:15 AM	Atty Vaysman Duke Kentucky - witness Riggins Note: Sacre, Candace H	Any corrections?

11:46:18 AM Atty Vaysman Duke Kentucky - witness Riggins  
Note: Sacre, Candace H Asked same questions today, responses remain same?

11:46:24 AM Atty Vaysman Duke Kentucky - witness Weir  
Note: Sacre, Candace H Direct Examination. Name, title, and business address?

11:46:36 AM Atty Vaysman Duke Kentucky - witness Weir  
Note: Sacre, Candace H Cause responses be filed?

11:46:42 AM Atty Vaysman Duke Kentucky - witness Weir  
Note: Sacre, Candace H Any corrections?

11:46:45 AM Atty Vaysman Duke Kentucky - witness Weir  
Note: Sacre, Candace H Asked same questions today, responses be same?

11:46:57 AM Atty Vaysman Duke Kentucky - witness McClay  
Note: Sacre, Candace H Direct Examination. Name, title, and business address?

11:47:17 AM Atty Vaysman Duke Kentucky - witness McClay  
Note: Sacre, Candace H Cause responses be filed?

11:47:21 AM Atty Vaysman Duke Kentucky - witness McClay  
Note: Sacre, Candace H Any corrections?

11:47:24 AM Atty Vaysman Duke Kentucky - witness McClay  
Note: Sacre, Candace H Asked same questions today, responses be same?

11:47:33 AM Commissioner Regan  
Note: Sacre, Candace H Witnesses are sworn.

11:47:44 AM Commissioner Regan  
Note: Sacre, Candace H Cross Examination?

11:47:52 AM Executive Advisor Attorney Pinney PSC - witness Miller  
Note: Sacre, Candace H Cross Examination. Costs not recovered through fuel adjustment clause, Duke recover those disallowed costs through other mechanisms?

11:48:50 AM Executive Advisor Attorney Pinney PSC - witness Miller  
Note: Sacre, Candace H Just for noneconomic purchases forced outages?

11:49:08 AM Executive Advisor Attorney Pinney PSC - witness Miller  
Note: Sacre, Candace H Other situations, not forced outages, power purchases maintenance outages, disallowed not recovered through FAC recovered elsewhere?

11:49:28 AM Executive Advisor Attorney Pinney PSC - witness Miller  
Note: Sacre, Candace H Like LG&E/KU, or EKPC, included in test year?

11:49:36 AM Executive Advisor Attorney Pinney PSC - witness Miller  
Note: Sacre, Candace H And subject to Commission review and approval?

11:49:42 AM Executive Advisor Attorney Pinney PSC - witness Hughes  
Note: Sacre, Candace H Outage extended longer at East Bend, Duke Kentucky seen any effects COVID on fuel procurement, inventory, outages extending longer than anticipated, personnel issues?

11:50:30 AM Executive Advisor Attorney Pinney PSC - witness Hughes  
Note: Sacre, Candace H So just a slowdown, labor to which referring for producers?

11:50:37 AM Executive Advisor Attorney Pinney PSC - witness Riggins  
Note: Sacre, Candace H What about maintenance or personnel?

11:52:11 AM Executive Advisor Attorney Pinney PSC - witness Riggins  
Note: Sacre, Candace H As part of larger company, rely upon parent company help source equipment?

11:53:00 AM Executive Advisor Attorney Pinney PSC - witness Riggins  
Note: Sacre, Candace H Any other COVID-related issues?

11:53:19 AM Executive Advisor Attorney Pinney PSC - witness Riggins and Miller  
Note: Sacre, Candace H Inter-company purchase at cost?

11:54:25 AM Executive Advisor Attorney Pinney PSC - witness Hughes  
Note: Sacre, Candace H Fuel procurement issues, East Bend only coal fired, coal procurement, Duke seen fewer respondents to requests?

11:55:17 AM	Executive Advisor Attorney Pinney Note: Sacre, Candace H	PSC - witness Hughes Duke Kentucky considered or changed philosophy spot versus long-term, percentage of spot versus long-term contracts for East Bend?
11:56:08 AM	Executive Advisor Attorney Pinney Note: Sacre, Candace H	PSC - witness Hughes Term agreements, standard length of time, standard length of time Duke Kentucky seeks?
11:56:26 AM	Executive Advisor Attorney Pinney Note: Sacre, Candace H	PSC - witness Hughes Considered making longer agreements?
11:56:59 AM	Executive Advisor Attorney Pinney Note: Sacre, Candace H	PSC - witness Hughes Regard normal suppliers, RFP issued Duke Kentucky gets list of respondents, Duke Kentucky seen change in relationship with providers?
11:58:29 AM	Executive Advisor Attorney Pinney Note: Sacre, Candace H	PSC - witness Hughes Inventory levels at East Bend, current levels, within target range?
11:58:44 AM	Executive Advisor Attorney Pinney Note: Sacre, Candace H	PSC - witness Hughes That's target, somewhere around there?
11:59:02 AM	Executive Advisor Attorney Pinney Note: Sacre, Candace H	PSC - witness Hughes Target usually 45 days?
11:59:12 AM	Executive Advisor Attorney Pinney Note: Sacre, Candace H	PSC - witness Hughes Ample inventory, anticipate able increase inventory?
11:59:28 AM	Executive Advisor Attorney Pinney Note: Sacre, Candace H	PSC - witness Hughes Difference between target 45 days and current 28 days just difficulty acquiring coal, what accounts for that?
11:59:54 AM	Executive Advisor Attorney Pinney Note: Sacre, Candace H	PSC - witness Hughes October down to 36-day inventory, now 28, what think anticipated inventory level be by end of year?
12:00:29 PM	Executive Advisor Attorney Pinney Note: Sacre, Candace H	PSC - witness Hughes No changes really be made, any changes made to procurement practices short term get back to inventory level?
12:00:46 PM	Executive Advisor Attorney Pinney Note: Sacre, Candace H	PSC - witness Miller When FAC rate factor sheet filed has many cost components, true-up from previous month, current month estimated fuel cost?
12:02:08 PM	Executive Advisor Attorney Pinney Note: Sacre, Candace H	PSC - witness Miller Two-month lag, estimate?
12:02:17 PM	Executive Advisor Attorney Pinney Note: Sacre, Candace H	PSC - witness Miller How costs estimated?
12:03:03 PM	Executive Advisor Attorney Pinney Note: Sacre, Candace H	PSC - witness Miller Includes coal and oil or fuel burned and related RTO PJM items flowed through, reason not provide real-time numbers books close certain amount of time, have problems with timeliness PJM codes that come through?
12:04:05 PM	Executive Advisor Attorney Pinney Note: Sacre, Candace H	PSC - witness Miller What typical lag for PJM true-up?
12:04:25 PM	Executive Advisor Attorney Pinney Note: Sacre, Candace H	PSC - witness Miller Ever time exceeds that?
12:04:45 PM	Executive Advisor Attorney Pinney Note: Sacre, Candace H	PSC - witness Miller If get final true-up estimated costs recovered new two-year period, S105, credit back to customers, how Duke Kentucky account for that?
12:05:29 PM	Executive Advisor Attorney Pinney Note: Sacre, Candace H	PSC - witness Miller Ask post-hearing request detail how estimates made?
12:05:30 PM	POST-HEARING DATA REQUEST Note: Sacre, Candace H Note: Sacre, Candace H	EXECUTIVE ADVISOR ATTORNEY PINNEY PSC - WITNESS MILLER DETAIL HOW FINAL TRUE-UP OF ESTIMATED COSTS MADE

12:05:56 PM	Executive Advisor Attorney Pinney	PSC - witness Daniel
	Note: Sacre, Candace H	With regard to Woodsdale units, burn both natural gas and fuel oil?
12:06:15 PM	Executive Advisor Attorney Pinney	PSC - witness Daniel
	Note: Sacre, Candace H	Woodsdale, primarily used as peaker units?
12:06:29 PM	Executive Advisor Attorney Pinney	PSC - witness Daniel
	Note: Sacre, Candace H	Primarily natural gas, between preferred fuels, both available, which preferred to burn?
12:06:50 PM	Executive Advisor Attorney Pinney	PSC - witness Daniel
	Note: Sacre, Candace H	Notice during this period of time TETCo, transmission company or gas company or both provides natural gas to Woodsdale units?
12:07:02 PM	Executive Advisor Attorney Pinney	PSC - witness McClay
	Note: Sacre, Candace H	Issued OFO or operational flow order, explain what OFO actually means?
12:07:56 PM	Executive Advisor Attorney Pinney	PSC - witness McClay
	Note: Sacre, Candace H	Asked questions whether OFO be individual customer or general one?
12:08:05 PM	Executive Advisor Attorney Pinney	PSC - witness McClay
	Note: Sacre, Candace H	What are differences?
12:08:32 PM	Executive Advisor Attorney Pinney	PSC - witness McClay
	Note: Sacre, Candace H	What would trigger that?
12:08:43 PM	Executive Advisor Attorney Pinney	PSC - witness McClay
	Note: Sacre, Candace H	During winter storm Yuri, natural gas constrained, beyond that what could cause company like TETCo to issue OFO?
12:09:31 PM	Executive Advisor Attorney Pinney	PSC - witness McClay
	Note: Sacre, Candace H	Range from mundane to dramatic?
12:09:40 PM	Executive Advisor Attorney Pinney	PSC - witness McClay
	Note: Sacre, Candace H	Regard TETCo, Duke have firm transportation contract, or what nature of contract?
12:10:26 PM	Executive Advisor Attorney Pinney	PSC - witness McClay
	Note: Sacre, Candace H	Firm, price not guaranteed, supply is?
12:10:42 PM	Executive Advisor Attorney Pinney	PSC - witness Daniel
	Note: Sacre, Candace H	Situations when Woodsdale needs to burn but natural gas not available, will burn fuel oil?
12:10:56 PM	Executive Advisor Attorney Pinney	PSC - witness Daniel
	Note: Sacre, Candace H	Occurred during review period?
12:11:09 PM	Executive Advisor Attorney Pinney	PSC - witness Daniel
	Note: Sacre, Candace H	Burn related making sure would run, situation natural gas not available to Woodsdale, step back, who decides when Woodsdale need dispatch?
12:11:36 PM	Executive Advisor Attorney Pinney	PSC - witness Daniel
	Note: Sacre, Candace H	How often dispatched?
12:12:00 PM	Executive Advisor Attorney Pinney	PSC - witness Daniel
	Note: Sacre, Candace H	Simple CTs?
12:12:13 PM	Executive Advisor Attorney Pinney	PSC - witness Daniel
	Note: Sacre, Candace H	If units called on to run and gas not available, Woodsdale would burn fuel oil?
12:12:50 PM	Executive Advisor Attorney Pinney	PSC - witness Daniel
	Note: Sacre, Candace H	If available only for oil burn, increases costs?
12:13:00 PM	Executive Advisor Attorney Pinney	PSC - witness McClay
	Note: Sacre, Candace H	What reserves fuel oil on site for Woodsdale?
12:13:20 PM	Executive Advisor Attorney Pinney	PSC - witness McClay
	Note: Sacre, Candace H	For all the units?
12:13:32 PM	Executive Advisor Attorney Pinney	PSC - witness Daniel
	Note: Sacre, Candace H	East Bend and maintenance, outage extended beyond period under review, remind when East Bend taken down for planned outage?

12:14:05 PM	Executive Advisor Attorney Pinney PSC - witness McDaniel Note: Sacre, Candace H	For its fall planned outage?
12:14:07 PM	Executive Advisor Attorney Pinney PSC - witness Daniel Note: Sacre, Candace H	Was outage scheduled for spring?
12:14:38 PM	Executive Advisor Attorney Pinney PSC - witness Swez Note: Sacre, Candace H	When is Duke peak, summer or winter?
12:14:52 PM	Executive Advisor Attorney Pinney PSC - witness Daniel Note: Sacre, Candace H	Decision for both maintenances made on shoulder months?
12:15:04 PM	Executive Advisor Attorney Pinney PSC - witness Daniel Note: Sacre, Candace H	Consent of PJM?
12:15:19 PM	Executive Advisor Attorney Pinney PSC - witness Daniel and Riggins Note: Sacre, Candace H	When East Bend come back on line?
12:16:04 PM	Executive Advisor Attorney Pinney PSC - witness Swez Note: Sacre, Candace H	While East Bend down, how Duke make up loss of power?
12:16:47 PM	Executive Advisor Attorney Pinney PSC - witness Swez Note: Sacre, Candace H	Purchase power from PJM?
12:16:52 PM	Executive Advisor Attorney Pinney PSC - witness Swez and McClay Note: Sacre, Candace H	Duke Kentucky have bilateral contracts for backup power during this time, or all purchased through PJM?
12:17:40 PM	Executive Advisor Attorney Pinney PSC - witness Daniel Note: Sacre, Candace H	Original scheduled maintenance outage in fall?
12:18:07 PM	Executive Advisor Attorney Pinney PSC - witness McClay Note: Sacre, Candace H	Have hedging layered, anticipated time or buffer?
12:19:16 PM	Executive Advisor Attorney Pinney PSC Note: Sacre, Candace H	No further questions.
12:19:20 PM	Commissioner Regan Note: Sacre, Candace H	Redirect? (Click on link for further comments.)
12:19:23 PM	Commissioner Regan Note: Sacre, Candace H	Recross? (Click on link for further comments.)
12:19:24 PM	Executive Advisor Attorney Pinney PSC Note: Sacre, Candace H	Post-hearing data requests. (Click on link for further comments.)
12:19:57 PM	Commissioner Regan Note: Sacre, Candace H	Witnesses excused and case adjourned.
12:25:33 PM	Commissioner Regan Note: Sacre, Candace H	Call Case No. 2022-00041, Big Rivers Electric Corporation.
12:25:38 PM	Commissioner Regan Note: Sacre, Candace H	Entry of appearance of counsel.
12:25:41 PM	Atty Santana BREC Note: Sacre, Candace H	Sentha Santana, for Big Rivers Electric Corporation.
12:25:51 PM	Executive Advisor Attorney Pinney PSC Note: Sacre, Candace H	JEB Pinney, with me John Rogness and Christian Everly.
12:26:00 PM	Commissioner Regan Note: Sacre, Candace H	Public notice. (Click on link for further comments.)
12:26:07 PM	Commissioner Regan Note: Sacre, Candace H	Outstanding motions. (Click on link for further comments.)
12:26:15 PM	Commissioner Regan Note: Sacre, Candace H	Public Comments. (Click on link for further comments.)
12:26:42 PM	Commissioner Regan Note: Sacre, Candace H	Call your witnesses.
12:26:47 PM	Atty Santana BREC - witness Payne Note: Sacre, Candace H	Direct Examination. Name, title, and business address?
12:27:00 PM	Atty Santana BREC - witness Payne Note: Sacre, Candace H	Cause be filed responses?

12:27:08 PM Atty Santana BREC - witness Payne  
Note: Sacre, Candace H Changes or additions?

12:27:13 PM Atty Santana BREC - witness Payne  
Note: Sacre, Candace H Response be same today if same questions asked?

12:27:29 PM Commissioner Regan  
Note: Sacre, Candace H Witnesses sworn. (Click on link for further comments.)

12:27:41 PM Atty Santana BREC - witness Stone  
Note: Sacre, Candace H Direct Examination. Name, title, and business address?

12:27:54 PM Atty Santana BREC - witness Stone  
Note: Sacre, Candace H Cause be filed responses?

12:28:00 PM Atty Santana BREC - witness Stone  
Note: Sacre, Candace H Corrections or additions?

12:28:06 PM Atty Santana BREC - witness Stone  
Note: Sacre, Candace H Do responses remain same today?

12:28:12 PM Atty Santana BREC - witness Burden  
Note: Sacre, Candace H Direct Examination. Name, title, and business address?

12:28:25 PM Atty Santana BREC - witness Burden  
Note: Sacre, Candace H Cause be filed responses?

12:28:31 PM Atty Santana BREC - witness Burden  
Note: Sacre, Candace H Corrections or additions?

12:28:36 PM Atty Santana BREC - witness Burden  
Note: Sacre, Candace H If asked today, answers remain the same?

12:28:44 PM Atty Santana BREC - witness Gregory  
Note: Sacre, Candace H Direct Examination. Name, title, and business address?

12:28:57 PM Atty Santana BREC - witness Gregory  
Note: Sacre, Candace H Cause be filed responses?

12:29:04 PM Atty Santana BREC - witness Gregory  
Note: Sacre, Candace H Corrections or additions?

12:29:09 PM Atty Santana BREC - witness Gregory  
Note: Sacre, Candace H If asked today, responses remain the same?

12:29:14 PM Atty Santana BREC - witness Hankins  
Note: Sacre, Candace H Direct Examination. Name, title, and business address?

12:29:27 PM Atty Santana BREC - witness Hankins  
Note: Sacre, Candace H Cause be filed responses?

12:29:35 PM Atty Santana BREC - witness Hankins  
Note: Sacre, Candace H Corrections or additions?

12:29:41 PM Atty Santana BREC - witness Hankins  
Note: Sacre, Candace H If asked today, responses remain the same?

12:29:51 PM Commissioner Regan  
Note: Sacre, Candace H Cross Examination?

12:29:58 PM Executive Advisor Attorney Pinney PSC - witness Stone  
Note: Sacre, Candace H Cross Examination. Fuel costs not recovered through FAC, Big Rivers recover elsewhere?

12:30:47 PM Executive Advisor Attorney Pinney PSC - witness Stone  
Note: Sacre, Candace H Any disallowed costs not included?

12:31:05 PM Executive Advisor Attorney Pinney PSC - witness Stone  
Note: Sacre, Candace H Not as function regulation, after hearing unreasonable, have to discharge costs, not recovered through PPA?

12:31:30 PM Executive Advisor Attorney Pinney PSC - witness Stone  
Note: Sacre, Candace H May request post-hearing data request amount flowed through annually recovered in PPA disallowed in FAC?

12:31:50 PM Executive Advisor Attorney Pinney PSC - witness Payne  
Note: Sacre, Candace H With regard COVID, what experienced?

12:32:31 PM	Executive Advisor Attorney Pinney	PSC - witness Payne and Burden Note: Sacre, Candace H	Issues ongoing with transportation and production?
12:33:23 PM	Executive Advisor Attorney Pinney	PSC - witness Burden Note: Sacre, Candace H	Relates to acquiring materials, affect Green units coal to gas?
12:34:05 PM	Executive Advisor Attorney Pinney	PSC - witness Burden Note: Sacre, Candace H	Green Station fully converted and both units operational?
12:34:20 PM	Executive Advisor Attorney Pinney	PSC - witness Burden Note: Sacre, Candace H	Explain what commercialized means?
12:34:42 PM	Executive Advisor Attorney Pinney	PSC - witness Burden Note: Sacre, Candace H	With regard to Green Station, operational issues?
12:35:18 PM	Executive Advisor Attorney Pinney	PSC - witness Burden Note: Sacre, Candace H	Running well?
12:35:25 PM	Executive Advisor Attorney Pinney	PSC - witness Payne Note: Sacre, Candace H	Fuel procurement, testimony about changing markets for coal, led BREC to reassess how approach fuel procurement through coal procurement spot versus long-term contracts?
12:36:42 PM	Executive Advisor Attorney Pinney	PSC - witness Payne Note: Sacre, Candace H	Spot purchase for natural gas?
12:36:54 PM	Executive Advisor Attorney Pinney	PSC - witness Payne Note: Sacre, Candace H	Know longest term contract, three years or exceed that?
12:37:15 PM	Executive Advisor Attorney Pinney	PSC - witness Payne Note: Sacre, Candace H	Relationship with fuel providers, BREC relationship changed?
12:38:45 PM	Executive Advisor Attorney Pinney	PSC - witness Payne Note: Sacre, Candace H	For period of review, 37 percent coal purchases spot purchases, typical?
12:39:22 PM	Executive Advisor Attorney Pinney	PSC - witness Payne Note: Sacre, Candace H	Commission First, Item 3, not able meet target coal inventory Oct 31, 30 to 60 days, only 24 days at this time, what reason for missing target, difficulty procuring coal inventory?
12:40:02 PM	Executive Advisor Attorney Pinney	PSC - witness Payne Note: Sacre, Candace H	Hot summer when being called upon, or coal units economical for dispatch at the time?
12:40:24 PM	Executive Advisor Attorney Pinney	PSC - witness Payne Note: Sacre, Candace H	Inventory levels back to targets at Wilson?
12:40:39 PM	Executive Advisor Attorney Pinney	PSC - witness Payne Note: Sacre, Candace H	Above window or above target?
12:40:51 PM	Executive Advisor Attorney Pinney	PSC - witness Payne Note: Sacre, Candace H	Still coal at Green Station?
12:40:59 PM	Executive Advisor Attorney Pinney	PSC - witness Payne Note: Sacre, Candace H	How much?
12:41:08 PM	Executive Advisor Attorney Pinney	PSC - witness Payne Note: Sacre, Candace H	How much Wilson burn in a day?
12:41:24 PM	Executive Advisor Attorney Pinney	PSC - witness Payne Note: Sacre, Candace H	Lot of coal at Green, not seem to be a lot, coal be used at Wilson or what are options?
12:41:48 PM	Executive Advisor Attorney Pinney	PSC - witness Payne Note: Sacre, Candace H	What kind of coal is it?
12:42:18 PM	Executive Advisor Attorney Pinney	PSC - witness Payne Note: Sacre, Candace H	Evaluating sale of coal, how allocate proceeds from sale?
12:42:42 PM	Executive Advisor Attorney Pinney	PSC - witness Payne Note: Sacre, Candace H	Reduce amount of reg asset?
12:42:53 PM	Commissioner Regan - witness Payne	Note: Sacre, Candace H	Examination. Reduce amount of asset, did you say?

12:43:08 PM	Executive Advisor Attorney Pinney PSC - witness Payne Note: Sacre, Candace H	Cross Examination (cont'd). Confidential response, not ask specific numbers, Response, Staff First, Item 1-5, amended May 19 2022, price paid Contract BRA-21-009 effective Nov 2021 higher than other contracts, why is that price significantly higher?
12:44:52 PM	Executive Advisor Attorney Pinney PSC - witness Payne Note: Sacre, Candace H	How coal prices running right now?
12:45:13 PM	Executive Advisor Attorney Pinney PSC - witness Payne Note: Sacre, Candace H	Conducted audit of one supplier, request audit problems or routine?
12:45:50 PM	Executive Advisor Attorney Pinney PSC - witness Payne Note: Sacre, Candace H	Long-term contracts burning less coal than did not too long ago, no long-term concerns maintaining coal supply?
12:46:21 PM	Executive Advisor Attorney Pinney PSC - witness Hankins Note: Sacre, Candace H	Responses, Staff First, Item 12, firm power commitments, purchases in sales, for items listed as purchases, reason given off-system sales adjustment, explain to me BREC purchase power from one entity satisfy off-system sales, what off-system sales adjustments mean?
12:47:40 PM	Executive Advisor Attorney Pinney PSC - witness Hankins Note: Sacre, Candace H	Have firm commitment sell to KYNEA provide power, cheaper for BREC purchase power from another source satisfy obligation for sales, situation makes purchases or getting it wrong?
12:48:38 PM	Executive Advisor Attorney Pinney PSC - witness Hankins Note: Sacre, Candace H	Explain in terms of why be necessary if BREC has sufficient generation, or situations where not have sufficient generation?
12:49:15 PM	Executive Advisor Attorney Pinney PSC - witness Hankins Note: Sacre, Candace H	Less generation because of conversion?
12:49:37 PM	Executive Advisor Attorney Pinney PSC - witness Hankins Note: Sacre, Candace H	When say change in position, made contracts, had generation?
12:49:57 PM	Executive Advisor Attorney Pinney PSC - witness Burden Note: Sacre, Candace H	Firm power sales commitments, what effect on BREC generation capacity with conversion of Green units?
12:51:00 PM	Executive Advisor Attorney Pinney PSC - witness Burden Note: Sacre, Candace H	Not understand difference, explain?
12:51:39 PM	Executive Advisor Attorney Pinney PSC - witness Burden Note: Sacre, Candace H	Overall, come in for IRP, maximum BREC generate, megawatt capacity, change in overall capacity?
12:52:17 PM	Executive Advisor Attorney Pinney PSC - witness Burden Note: Sacre, Candace H	Could change decision to dispatch?
12:52:23 PM	Executive Advisor Attorney Pinney PSC - witness Hankins Note: Sacre, Candace H	Effect BREC positions on contracts for sales going forward once contracts end?
12:53:17 PM	Executive Advisor Attorney Pinney PSC Note: Sacre, Candace H	No further.
12:53:20 PM	Commissioner Regan Note: Sacre, Candace H	Redirect? (Click on link for further comments.)
12:53:22 PM	Commissioner Regan Note: Sacre, Candace H	Anything else? (Click on link for further comments.)
12:53:38 PM	Commissioner Regan Note: Sacre, Candace H	Witnesses excused and case adjourned.
12:53:51 PM	Session Ended	



## Exhibit List Report

FAC Hearings 04Aug2022

2022-00036 through 2022-00041

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<b>Name:</b>	<b>Description:</b>
KIUC HEARING EXHIBIT 1	807 KAR 5:056 FUEL ADJUSTMENT CLAUSE AND RELATED DOCUMENTS PROVIDED BY KIUC
KIUC HEARING EXHIBIT 2	SPREADSHEET PREPARED BY KIUC
KIUC HEARING EXHIBIT 3	AVERAGE AND MAXIMUM MARKET PURCHASES (NON-ROCKPORT) ASSIGNED TO NATIVE LOAD NOT DUE TO FORCED OUTAGES
KIUC HEARING EXHIBIT 4	KENTUCKY POWER COMPANY SELECTED DATA OCTOBER 2021, SEPTEMBER 2021, AUGUST 2021, JULY 2021, JUNE 2021, AND MAY 2021
KIUC HEARING EXHIBIT 5	FUEL ADJUSTMENT CASE NO. 2022-00036 GENERATING UNIT OUTAGES MAY 1 2021 - OCTOBER 31 2021
KIUC HEARING EXHIBIT 6	KPSC CASE NO. 2022-00036 KIUC FIRST SET OF DATA REQUESTS DATED MAY 9 2022

**807 KAR 5:056. Fuel adjustment clause.**

RELATES TO: KRS 61.870 - 61.884, 143.020, Chapter 278

STATUTORY AUTHORITY: KRS 278.030(1), (2), 278.040(3)

NECESSITY, FUNCTION, AND CONFORMITY: KRS 278.040(3) authorizes the Public Service Commission to promulgate administrative regulations to implement the provisions of KRS Chapter 278. KRS 278.030(1) authorizes utilities to demand, collect, and receive fair, just, and reasonable rates. KRS 278.030(2) requires every utility to furnish adequate, efficient, and reasonable service. This administrative regulation establishes the requirements with respect to the implementation of automatic fuel adjustment clauses by which electric utilities may immediately recover increases in fuel costs subjected to later scrutiny by the Public Service Commission.

Section 1. Fuel Adjustment Clause. Fuel adjustment clauses that are not in conformity with the requirements established in subsections (1) through (6) of this section are not in the public interest and may result in suspension of those parts of the rate schedules based on severity of the nonconformity and any history of nonconformity.

(1) The fuel adjustment clause shall provide for periodic adjustment per Kilowatt Hour (KWH) of sales equal to the difference between the fuel costs per KWH sale in the base period and in the current period according to the following formula:

$$\text{Adjustment Factor} = \frac{F(m)}{S(m)} - \frac{F(b)}{S(b)}$$

Where F(b) is the cost of fuel in the base period, F(m) is the cost of fuel in the current period, S(b) is sales in the base period, and S(m) is sales in the current period, all as established in subsections (2) through (6) of this section.

(2) F(b)/S(b) shall be determined so that on the effective date of the commission's approval of the utility's application of the formula, the resultant adjustment shall be equal to zero.

(3) Fuel costs (F) shall be the most recent actual monthly cost, based on weighted average inventory costing, of:

(a) Fossil fuel consumed in the utility's own plants, and the utility's share of fossil and nuclear fuel consumed in jointly owned or leased plants, plus the cost of fuel that would have been used in plants suffering forced generation or transmission outages, but less the cost of fuel related to substitute generation; plus

(b) The actual identifiable fossil and nuclear fuel costs associated with energy purchased for reasons other than as established in paragraph (c) of this subsection, but excluding the cost of fuel related to purchases to substitute for the forced outages; plus

(c) The net energy cost of energy purchases, exclusive of capacity or demand charges irrespective of the designation assigned to the transaction, if the energy is purchased on an economic dispatch basis. Costs, such as the charges for economy energy purchases, the charges as a result of scheduled outage, and other charges for energy being purchased by the buyer to substitute for the buyer's own higher cost energy, may be included; and less

(d) The cost of fossil fuel recovered through intersystem sales, including the fuel costs related to economy energy sales and other energy sold on an economic dispatch basis.

(4) Forced outages are all nonscheduled losses of generation or transmission that require substitute power for a continuous period in excess of six (6) hours. If forced outages are

not the result of faulty equipment, faulty manufacture, faulty design, faulty installations, faulty operation, or faulty maintenance, but are Acts of God, riot, insurrection, or acts of the public enemy, then the utility may, upon proper showing, with the approval of the commission, include the fuel cost of substitute energy in the adjustment. In making the calculations of fuel cost (F) in subsection (3)(a) and (b) of this section, the forced outage costs to be subtracted shall be no less than the fuel cost related to the lost generation until approval is obtained.

(5) Sales (S) shall be all KWH's sold, excluding intersystem sales. Utility used energy shall not be excluded in the determination of sales (S). If, for any reason, billed system sales cannot be coordinated with fuel costs for the billing period, sales may be equated to:

- (a) Generation; plus
- (b) Purchases; plus
- (c) Interchange-in; less
- (d) Energy associated with pumped storage operations; less
- (e) Intersystem sales referred to in subsection (3)(d) of this section; less
- (f) Total system losses.

(6) The cost of fossil fuel shall only include the cost of the fuel itself and necessary charges for transportation of the fuel from the point of acquisition to the unloading point, as listed in Account 151 of FERC Uniform System of Accounts for Public Utilities and Licensees, less any cash or other discounts.

#### Section 2. Filing Requirements.

(1) If a utility initially proposes a fuel adjustment clause, the utility shall submit copies of each fossil fuel purchase contract not otherwise on file with the commission and all other agreements, options, amendments, modifications, and similar documents related to the procurement of fuel supply or purchased power.

(2) Any changes in the contracts or other documents filed pursuant to subsection (1) of this section, including price escalations, and any new agreements entered into after the initial submission, shall be submitted at the time they are entered into.

(3) If fuel is purchased from utility-owned or controlled sources, or the contract contains a price escalation clause, those facts shall be noted, and the utility shall explain and justify them in writing.

(4) The monthly fuel adjustment shall be filed with the commission no later than ten (10) days before it is scheduled to go into effect, along with all the necessary supporting data to justify the amount of the adjustment.

(5) Copies of all documents required to be filed with the commission under this administrative regulation shall be open and made available for public inspection at the office of the Public Service Commission pursuant to the provisions of KRS 61.870 through 61.884.

#### Section 3. Review of Fuel Adjustment Clauses.

(1) Fuel charges that are unreasonable shall be disallowed and may result in the suspension of the fuel adjustment clause based on the severity of the utility's unreasonable fuel charges and any history of unreasonable fuel charges.

(2) The commission on its own motion may investigate any aspect of fuel purchasing activities covered by this administrative regulation.

(3)

(a) At six (6) month intervals, the commission shall conduct a formal review and may conduct public hearings on a utility's past fuel adjustments.

(b) The commission shall order a utility to charge off and amortize, by means of a temporary decrease of rates, any adjustments the commission finds unjustified due to improper calculation or application of the charge or improper fuel procurement practices.

(4)

(a) Every two (2) years following the initial effective date of each utility's fuel clause, the commission shall conduct a formal review and evaluate past operations of the clause, disallow improper expenses and, to the extent appropriate, reestablish the fuel clause charge in accordance with Section 1(2) of this administrative regulation.

(b) The commission may conduct a public hearing if the commission finds that a hearing is necessary for the protection of a substantial interest or is in the public interest.

(8 Ky.R. 822; eff. 4-7-1982; Crt eff. 3-27-2019; 45 Ky.R. 3272; 46 Ky.R. 41, 435; eff. 8-20-2019; 47 Ky.R.1485, 1965; eff. 6-3-2021.)

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

AN EXAMINATION BY THE PUBLIC SERVICE )  
COMMISSION OF THE APPLICATION OF THE )  
FUEL ADJUSTMENT CLAUSE OF AMERICAN ) CASE NO. 2000-00495-B  
ELECTRIC POWER COMPANY FROM MAY 1, )  
2001 TO OCTOBER 31, 2001 )

ORDER

Pursuant to Administrative Regulation 807 KAR 5:056, the Commission on December 20, 2001 established this case to review and evaluate the operation of the fuel adjustment clause ( FAC ) of American Electric Power Company ( AEP ) for the 6 months ended October 31, 2001.

As part of this review, AEP, pursuant to Commission Order, submitted certain information concerning its compliance with Administrative Regulation 807 KAR 5:056. A public hearing was held on February 19, 2002 at which the following persons testified: Errol Wagner, AEP s Director of Rates; Todd William Alleshouse, Energy Production Manager of AEP s Big Sandy Generating Plant; and Steven D. Baker, AEP s Manager of Case Management.

The Commission previously established AEP s base fuel cost at 11.45 mills per Kwh.<sup>1</sup> A review of AEP s monthly fuel clause filings shows that the actual fuel cost incurred for the 6-month period under review ranged from a low of 10.16 mills in May 2001 to a high of 13.07 mills in October 2001, with a 6-month average of 11.10 mills.

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<sup>1</sup> Case No. 2000-495, An Examination by the Public Service Commission of the Application of the Fuel Adjustment Clause of American Electric Power Company from November 1, 1998 to October 31, 2000 (March 15, 2001).

During this proceeding, the Commission examined the appropriate treatment under Administrative Regulation 807 KAR 5:056 for purchased power costs incurred to serve native load.<sup>2</sup> More specifically, we inquired about the types of power purchases that qualify as economy power purchases and the treatment of power purchases that are not considered economy power purchases.

Administrative Regulation 807 KAR 5:056, Section 1(3),<sup>3</sup> governs the recovery of purchased energy costs through an electric utility's FAC. It permits the inclusion of economy energy purchases, exclusive of capacity or demand charges, in the cost of fuel as calculated for FAC purposes when such energy is purchased on an economic dispatch basis. It also permits the recovery of actual identifiable fossil and nuclear fuel costs associated with energy purchased in non-economy transactions.

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<sup>2</sup> See Transcript at 28-31.

<sup>3</sup> Fuel costs (F) shall be the most recent actual monthly cost of:

(a) Fossil fuel consumed in the utility's own plants, and the utility's share of fossil and nuclear fuel consumed in jointly owned or leased plants, plus the cost of fuel which would have been used in plants suffering forced generation or transmission outages, but less the cost of fuel related to substitute generation; plus

(b) The actual identifiable fossil and nuclear fuel costs associated with energy purchased for reasons other than identified in paragraph (c) of this subsection, but excluding the cost of fuel related to purchases to substitute for the forced outages; plus

(c) The net energy cost of energy purchases, exclusive of capacity or demand charges (irrespective of the designation assigned to such transaction) when such energy is purchased on an economic dispatch basis. Included therein may be such costs as the charges for economy energy purchases and the charges as a result of scheduled outage, all such kinds of energy being purchased by the buyer to substitute for its own higher cost energy; and less

(d) The cost of fossil fuel recovered through intersystem sales including the fuel costs related to economy energy sales and other energy sold on an economic dispatch basis.

(e) All fuel costs shall be based on weighted average inventory costing.

In a highly regulated electric power wholesale market in which power suppliers routinely identified on their billing statements the portions of energy purchases attributable to fuel cost and to demand or capacity charges, this regulation was relatively easy to administer. With the recent restructuring of the wholesale electric power market, however, few wholesale suppliers continue to engage in such billing practices. AEP reports that none of its wholesale power suppliers provide this information.<sup>4</sup> To comply with the requirements of Administrative Regulation 807 KAR 5:056, it uses historical pricing information and reports the fuel cost of its power purchases as 80 percent of total purchase price.<sup>5</sup>

The Commission is concerned that these new market conditions, when coupled with the increasing use of purchased power to meet native load requirements, will lead to disparate treatment of purchased energy costs. Some electric utilities are treating energy purchases that supplement, but do not displace native generation, as economy purchases and seeking recovery of the total purchase cost through their FACs. Some electric utilities, no longer receiving billing information that identifies the fuel portion of their non-economy power purchases, are treating the entire purchase as a fuel cost. Other electric utilities, also lacking detailed billing information, are attempting to estimate the cost of the fuel portion of such transactions based on historic billing information. As a result, uniform treatment of fuel costs is being eroded creating the potential for recovery of non-fuel related costs through FACs.

Based upon our review of Administrative Regulation 807 KAR 5:056 and in recognition of the recent changes in the wholesale energy market, we find that some

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<sup>4</sup> AEP Response to the Commission's Order of December 20, 2001, Item 22(a).

<sup>5</sup> AEP Response to the Commission's Order of December 20, 2001, Item 22(b).

clarification of the regulation's treatment of economy energy purchases and non-economy energy purchases is necessary. Economy energy is [e]nergy produced and supplied from a more economical source in one system, substituted for that being produced or capable of being produced by a less economical source in another system." Sierra Pacific Power Co. v. Public Service Commission of Nevada, 634 P.2d 1200, 1203 fn.1 (Nev. 1981). Economy energy sales occur when utilities purchase energy from other utilities that can generate the energy at lower cost. Citizens of State v. Public Service Com'n, 464 So.2d 1194 (Fla.1985).<sup>6</sup>

We view economy energy purchases that are recoverable through an electric utility's FAC as purchases that an electric utility makes to serve native load, that displace its higher cost of generation, and that have an energy cost less than the avoided variable generation cost of the utility's highest cost generating unit available to serve native load during that FAC expense month. When the purchased energy price consists of a total charge per unit of energy, with no separate demand charge, the energy cost is the total charge per unit of energy. Where an energy vendor lists the components of the total energy price, the energy cost is the energy cost exclusive of any demand or capacity charges.

Non-economy energy purchases are purchases made to serve native load that have an energy cost greater than the avoided variable cost of the utility's highest cost generating unit available to serve native load during that FAC expense month. When the purchased energy price of such purchases consists of a total charge per unit of energy, with no separate demand charge, the energy cost is the total charge per unit

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<sup>6</sup> Such transactions are generally considered beneficial to utility ratepayers by permitting purchasing utilities to obtain lower cost power to meet their native load requirements while allowing selling utilities the opportunity to earn additional revenue by the sale of excess power.

of energy. When an energy vendor lists the components of the total energy price, the energy cost is the energy cost exclusive of any demand or capacity charges.

We interpret Administrative Regulation 807 KAR 5:056 as permitting an electric utility to recover through its FAC only the lower of the actual energy cost of the non-economy purchased energy or the fuel cost of its highest cost generating unit available to be dispatched to serve native load during the reporting expense month. Costs for non-economy energy purchases that are not recoverable through an electric utility's FAC are considered non-FAC expenses and, if reasonably incurred, are otherwise eligible for recovery through base rates.

The Commission believes that this interpretation is consistent with the letter and the spirit of Administrative Regulation 807 KAR 5:056. It should ensure a uniform treatment of fuel costs by all electric utilities subject to our jurisdiction, provide a greater degree of certainty as to the fuel expenses eligible for recovery through a FAC, and encourage reasonable and economically efficient energy procurement practices, while continuing to protect the interests of utility ratepayers. We place AEP on notice that this interpretation shall be applied to all energy purchases made after April 30, 2002.

In reaching our interpretation, we are mindful that some power purchases occur under emergency circumstances. We recognize that in such circumstances wholesale power market prices may significantly exceed the fuel cost of an electric utility's highest cost generating unit available to serve native load. In those circumstances, the utility may apply to the Commission for immediate rate recovery of those costs. In reviewing such applications, we will carefully consider, inter alia, the nature of the emergency, the reasonableness of the energy transactions, the effect of non-recovery upon the utility, and all reasonable and lawful means of rate recovery available to the utility.

The Commission, having considered the evidence of record and being otherwise sufficiently advised, finds no evidence of improper calculation or application of AEP s FAC charges or improper fuel procurement practices.

IT IS THEREFORE ORDERED that the charges and credits billed by AEP through its FAC for the period May 1, 2001 to October 31, 2001 are approved.

Done at Frankfort, Kentucky, this 2<sup>nd</sup> day of May, 2002.

By the Commission

ATTEST:

  
Executive Director

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

AN EXAMINATION BY THE PUBLIC )  
SERVICE COMMISSION OF THE )  
APPLICATION OF THE FUEL ) CASE NO. 2000-00495-B  
ADJUSTMENT CLAUSE OF AMERICAN )  
ELECTRIC POWER COMPANY FROM )  
MAY 1, 2001 TO OCTOBER 31, 2001 )

O R D E R

On May 2, 2002, the Commission approved the fuel charges and credits that American Electric Power ( AEP ) billed through its Fuel Adjustment Clause ( FAC ) for from May 1, 2001 to October 31, 2001. In the same Order in which we approved those charges, we set forth our interpretation of Administrative Regulation 807 KAR 5:056 as it pertains to the recovery of non-economy purchased energy costs. More specifically, we declared that Administrative Regulation 807 KAR 5:056 permits an electric utility to recover through its FAC only the lower of the actual energy cost of the non-economy purchased energy or the fuel cost of its highest cost generating unit available to be dispatched to serve native load during the reporting expense month.<sup>1</sup> We further placed AEP on notice that we would apply this interpretation to all energy purchases occurring after April 30, 2002.

AEP, unlike the other electric utilities in this state that generate electricity, operates as part of a multi-state system that relies solely on low-cost base load

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<sup>1</sup> Case No. 2000-00495-B, An Examination by the Public Service Commission of the Application of the Fuel Adjustment Clause of American Electric Power Company from May 1, 2001 to October 31, 2001(Ky.PSC May 2, 2002) at 5.

generating units rather than a mix of generating units that includes higher cost peaking units. Expressing its concern that our interpretation failed to consider AEP's unique operating characteristics and would not achieve the Commission's expressed goal of uniform treatment of fuel costs, AEP petitioned for rehearing of our Order of May 2, 2002. On June 11, 2002, we granted AEP's petition.

AEP proposes the use of a proxy mechanism for the energy portion of non-economy energy purchases. Under this proposal, AEP recovers through its FAC non-economy purchased power costs that are the lower of its actual purchased power cost and the peaking unit equivalent cost.<sup>2</sup> AEP's proxy mechanism is based upon the operating characteristics of a General Electric simple cycle gas turbine.<sup>3</sup> The cost of the gas used by this hypothetical turbine will be the sum of the daily midpoint price for Columbia Gas Transmission (delivered Citygate) as published in that day's edition of Platt's Gas Daily and the current tariff rate for Columbia's Park and Lend Rate.

When a power purchase occurs during an expense month, AEP will determine the average daily market price for that month. It will then determine the lowest daily market price for gas for the hypothetical turbine during that month and compare that price to its actual average purchased energy cost for internal uses for the same month.

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<sup>2</sup> AEP presented its proposal at an informal conference on June 20, 2002 and subsequently submitted a written explanation of its proposal to Commission Staff and Kentucky Industrial Utility Customers, Inc. No objections to the proposal have been filed with the Commission. For further description of the mechanism, see Letters from Errol Wagner, AEP Director of Regulatory Services, to Gerald Wuetcher, Assistant General Counsel, Public Service Commission (June 28, 2002 and Aug. 12, 2002).

<sup>3</sup> A General Electric simple cycle gas turbine has a heat rate of 10,400 Btu/kWh at 50° Fahrenheit (winter operation) and a heat rate of 10,800 Btu/kWh at 90° Fahrenheit (summer operation). AEP proposes to use the heat rate of 10,400 Btu/kWh for the months of September through May and the heat rate of 10,800 for the months of 10,800 Btu/kWh for the months June through August.

If the actual average purchased energy cost for internal use for the month is 75 percent or less of the lowest daily market price for gas for the hypothetical gas turbine during the same month, AEP will consider this cost as the fuel cost for these purchases. If the actual average purchased energy cost for internal use for the month is greater than 75 percent of the lowest daily market price for gas for the hypothetical gas turbine, then AEP will compare its average purchased energy cost for internal uses with the market price for gas for the hypothetical turbine for each day of the month and exclude for FAC purposes any of the actual purchased energy costs that exceed the daily gas market price.

The Commission recognizes AEP is unique among Kentucky generators as it operates only base load coal-fired units. Our interpretation of Administrative Regulation 807 KAR 5:056, as set forth in our Order of May 2, 2002, permits AEP to recover a lesser portion of the cost of purchased power than other utilities that operate higher cost gas-fired peaking generators. This result could occur even if the supplier and source of supply are the same. This anomaly requires us to consider the use of AEP's proposed proxy mechanism. Based upon our review of the record and being otherwise sufficiently advised, we find that AEP's proposed Peaking Unit Equivalent approach to calculate the level of non-economy purchased power costs to flow through its FAC is reasonable and should be approved.

IT IS THEREFORE ORDERED that:

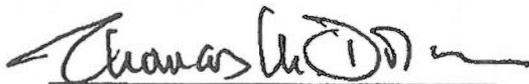
1. AEP shall use the Peaking Unit Equivalent approach to calculate the level of non-economy purchased power costs to flow through its FAC.

2. AEP shall use the Peaking Unit Equivalent method to calculate the level of non-economy purchased power costs to flow through its FAC on non-economy power purchases made after September 30, 2002.

Done at Frankfort, Kentucky, this 3<sup>rd</sup> day of October, 2002.

By the Commission

ATTEST:

  
Executive Director

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF KENTUCKY	)	
POWER COMPANY FOR (1) A GENERAL	)	
ADJUSTMENT OF ITS RATES FOR ELECTRIC	)	CASE NO.
SERVICE; (2) AN ORDER APPROVING ITS 2017	)	2017-00179
ENVIRONMENTAL COMPLIANCE PLAN; (3) AN	)	
ORDER APPROVING ITS TARIFFS AND RIDERS;	)	
(4) AN ORDER APPROVING ACCOUNTING	)	
PRACTICES TO ESTABLISH REGULATORY	)	
ASSETS AND LIABILITIES; AND (5) AN ORDER	)	
GRANTING ALL OTHER REQUIRED APPROVALS	)	
AND RELIEF	)	

ORDER

Kentucky Power Company ("Kentucky Power"), a wholly owned subsidiary of American Electric Power Company, Inc. ("AEP") is an electric utility that generates, transmits, distributes, and sells electricity to approximately 168,000 consumers in all or portions of 20 counties in eastern Kentucky.<sup>1</sup> Kentucky Power owns and operates a 285-megawatt ("MW") gas-fired steam-electric generating unit in Louisa, Kentucky, and owns and operates a 50 percent undivided interest in a coal-fired generating station in Moundsville, West Virginia; Kentucky Power's share consists of 780 MW. Kentucky Power obtains an additional 393 MW from Rockport (Indiana) Plant Generating Units No. 1 and No. 2 under a unit power agreement ("Rockport UPA"). Kentucky Power's transmission system is operated by PJM Interconnection, LLC ("PJM"), a regional

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<sup>1</sup> Application at 2. Kentucky Power also furnishes electric service at wholesale to the Cities of Olive Hill and Vanceburg, Kentucky.

The Commission is not convinced that this issue requires special ratemaking treatment. The Commission has long held that any purchased power costs not recoverable through the FAC are eligible for recovery through base rates. The Commission finds Kentucky Power's proposal to include an estimated amount of FAC Purchased Power Limitation Expense in base rates, and to subsequently true up that amount through Tariff P.P.A., is unreasonable, and therefore should be denied. The Commission notes that Kentucky Power filed this case using a historic test period. The Commission will allow recovery of the test year amount of purchased power reasonably incurred, but excluded from the FAC. To the extent that Kentucky Power incurs any expense due to purchased power that is appropriately incurred after the test year, but excluded from the FAC, it can file a base rate case seeking recovery of those expenses. For the foregoing reasons, adjustments W26 and W27, which total \$4,032,786, are unreasonable and should be removed from the revenue requirement.

3. Peaking Unit Equivalent Calculation

Kentucky Power proposed to change the methodology for calculating the peaking unit equivalent ("PUE") used in determining the FAC Purchased Power Limitation. In its Application, Kentucky Power proposes to include the cost of firm gas service as an expense in the calculation of its PUE. Kentucky Power stated that since the hypothetical combustion turbine ("CT") could be dispatched any day of the year, it requires firm gas service. The Commission disagrees. While firm gas service would certainly allow the CT to be dispatched any day of the year, the Commission is unaware of any jurisdictional utility utilizing firm gas service for a CT. Because CTs typically operate at low capacity factors and are primarily utilized during the summer peaking

months, when pipeline capacity would typically not be constrained, the Commission finds the inclusion of firm gas service in the calculation of the PUE to be unreasonable, and therefore, this change in the PUE calculation should be denied. Kentucky Power's proposal to include startup costs and variable O&M expense is reasonable and should be approved.

4. Gains and Losses from Incidental Gas Sales.

Kentucky Power proposed to recover gains and losses from incidental sales of natural gas through Tariff P.P.A. Kentucky Power nominates Big Sandy Unit 1 in the PJM day-ahead electric power market based in part on the price of natural gas purchased for delivery the next day. If the Big Sandy Unit 1 Day Ahead nomination price is higher than the PJM electric power market clearing price, Big Sandy Unit 1 is not selected to run in the Real Time Market. In such a case, the natural gas purchased must either be stored by Columbia Gas or be sold. Kentucky Power stated that in August, September, and November of 2016, there were days that it was required to sell natural gas that had been purchased for delivery because Big Sandy Unit 1 was not selected by PJM to run.<sup>140</sup>

In Case No. 2014-00078, Duke Energy Kentucky ("Duke Energy") proposed similar treatment of gains and losses it experienced in January and February of 2014 from incidental sales of natural gas.<sup>141</sup> Duke Energy amended its request to apply to similar losses or gains occurring in the future. The Commission approved the treatment of the January and February 2014 gains and losses. However, the Commission found

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<sup>140</sup> Application, Direct Testimony of John A. Rogness at 26-27

<sup>141</sup> Case No. 2014-00078, *An Investigation of Duke Energy Kentucky, Inc.'s Accounting Sale of Natural Gas Not Used in Its Combustion Turbines* (Ky. PSC Nov. 25, 2014).

1 Q. HAS THE COMPANY PROPOSED THIS TYPE OF RECOVERY IN PREVIOUS  
2 PROCEEDINGS FOR THE FAC PURCHASE POWER LIMITATION  
3 EXPENSE?

4 A. Yes, in Case No. 2014-00396, the Company proposed to collect all FAC Purchase Power  
5 Limitation expense through Tariff PPA. In its final order in that proceeding the  
6 Commission denied this recovery and stated the following:

7 *“Kentucky Power has not shown that the amounts of these excluded*  
8 *purchased power costs are volatile to the point of requiring this method*  
9 *of recovery. In addition, the Commission notes that there would be*  
10 *numerous administrative issues involved in establishing periodic*  
11 *proceedings to review and approve or deny these costs. The Commission*  
12 *believes these costs are more appropriately recoverable through base*  
13 *rates and will not approve this portion of the Settlement.”*  
14

15 The Company’s proposal in this case conforms to the Commission’s guidance on this  
16 issue in past cases. The Company’s proposal to include an adjusted level of purchase  
17 power limitation expense in its base rate cost of service and track the differences between  
18 that level and the volatile, actual expense is reasonable and equitable to both customers  
19 and the Company. Moreover, this method does not add any significant administrative  
20 burden as it is similar to other tracking mechanisms utilized the by the Company. If this  
21 expense item is not tracked through the purchase power adjustment, the Company stands  
22 to profit from or lose on an item that should be a dollar for dollar pass-through to  
23 customers as a cost of serving them, due to the extreme volatility and materiality of the  
24 FAC Purchase Power Limitation expense.

25 Q. IS THE COMPANY PROPOSING ANY CHANGE TO THE CALCULATION OF  
26 THE FAC PURCHASED POWER LIMITATION?

27 A. Yes. The Company is proposing to change the methodology for calculating the cost of  
28 the peaking unit equivalent used in the determining the FAC Purchased Power

1           Limitation. The Company's proposed change results in a peaking unit equivalent cost  
2           that more accurately reflects the cost of a hypothetical combustion turbine.

3   **Q. PLEASE DESCRIBE HOW THE COST OF THE PEAKING UNIT**  
4   **EQUIVALENT IS CALCULATED.**

5   A.   Currently, the cost of the peaking unit equivalent is calculated solely by multiplying the  
6   lowest hourly daily gas price at the Columbia Gas Appalachian pricing point (in  
7   \$/MMBtu) by a 10,400 heat rate (10,800 for June – August), divided by 1,000). For  
8   example, a gas price of \$3/MMBtu results in a peaking unit equivalent cost of  
9   \$31.2/MWh [(3\*10,400)/1000 = 31.2]. If the peaking unit equivalent is the highest cost  
10   unit in that hour<sup>10</sup>, the FAC Purchased Power Limitation limits recovery of purchased  
11   power costs through the FAC to \$31.2/MWh. To the extent the expense arising from this  
12   operation of the FAC Purchased Power Limitation, which is controlled by factors outside  
13   the Company's control, is not included in base rates, the Company is forced to absorb the  
14   expense.

15   **Q. WHAT CHANGES TO THE PEAKING UNIT EQUIVALENT CALCULATION**  
16   **IS THE COMPANY PROPOSING IN THIS PROCEEDING?**

17   A.   The Company proposes to include the following operating costs in calculation of the cost  
18   of the peaking unit equivalent:

- 19           • Unit startup costs
- 20           • The cost of firm natural gas service
- 21           • Variable O&M expense

---

<sup>10</sup> The hourly peaking unit equivalent cost calculation compares the hypothetical peaking unit to the Company's other generating units and uses the highest cost unit for the FAC Purchased Power Limitation calculation. The hypothetical peaking unit is often the highest cost unit.

1 Q. WHY SHOULD THESE COSTS BE INCLUDED IN THE PEAKING UNIT  
2 EQUIVALENT COST CALCULATION?

3 A. All of these costs the Company is proposing to include are costs that would be incurred to  
4 operate an actual natural gas combustion turbine generating unit (CT). The peaking unit  
5 equivalent cost calculation seeks to mimic the costs of operating an actual CT because  
6 the Company does not own a real CT for the purposes of calculating the FAC Purchased  
7 Power Limitation.

8 CT startup costs include start up fuel consumed, station power requirements and  
9 start up maintenance and labor; and are incurred when bringing a CT online but prior to  
10 the unit generating power. These are real costs that the hypothetical CT would incur in  
11 order to generate electricity and should be included in the peaking unit equivalent cost  
12 calculation.

13 In order to be available to generate electricity, a CT needs to have access to  
14 natural gas which is contracted for on either a non-firm or firm basis. Firm gas service  
15 means that the unit has reserved a portion of the capacity in the pipeline making gas  
16 always available for use in generating electricity. Since the hypothetical CT used in the  
17 peaking unit equivalent cost calculation can be "dispatched" any day of the year, it  
18 requires firm gas service. Because this is a cost that an actual CT would incur to provide  
19 the service presumed for the hypothetical CT, it should be included in the peaking unit  
20 equivalent cost calculation.

21 Finally, Variable O&M expense associated with operating the hypothetical CT  
22 should also be included in the peaking unit equivalent cost calculation because these  
23 expenses are necessary to generate electricity at a CT.

1 Q. PLEASE QUANTIFY THE IMPACT ON THE PEAKING UNIT EQUIVALENT  
2 COST CALCULATION FROM THESE PROPOSED CHANGES.

3 A. Based on the Company's experience and information available regarding costs associated  
4 with combustion turbines, the startup costs, variable O&M, and firm gas components  
5 combine to add between \$38 - \$39/MWh to the peaking unit equivalent cost calculation  
6 depending on the month of the year. The details behind this calculation can be found in  
7 Exhibit AEV 8.

(c) Gains and Losses from Incidental Gas Sales

8 Q. WHY IS THE COMPANY ALSO PROPOSING TO TRACK GAINS AND  
9 LOSSES FROM INCIDENTAL GAS SALES THROUGH TARIFF PPA?

10 A. Like PJM LSE OATT charges and credits and FAC Purchased Power Limitation  
11 expenses, gains and losses from the incidental sales of natural gas that the Company had  
12 purchased for use at Big Sandy Unit 1, but could not use or store, are highly volatile and  
13 largely outside of the Company's control. Additional information about the gains and  
14 losses from incidental gas sales is included in the testimony of Company Witness  
15 Rogness.

16 Q. IS THE COMPANY PROPOSING ADDITIONAL CHANGES TO TARIFF PPA  
17 IN THIS PROCEEDING?

18 A. Yes. In addition to tracking and recovering the difference between the costs described  
19 above, and the amount of those costs included in base rates, the Company is proposing to  
20 change the structure of the Power Purchase Adjustment itself from a monthly adjusting  
21 surcharge to an annually updated surcharge. The Company also proposes to change the  
22 rate structure from a percentage of revenue charge to a structure that includes a per-kWh

**Calculation of Proposed Peaking Unit Equivalent Cost Calculation Adjustment**

	Firm Gas Adjustment Calculation			Startup Costs \$/MWh	Variable O&M \$/MWh	Total \$/MWh Adjustment
	\$/MMBtu	Heat Rate	\$/MWh			
January	\$ 0.5181	10,400	\$ 5.39	\$ 30.00	\$ 3.48	\$ 38.87
February	\$ 0.5181	10,400	\$ 5.39	\$ 30.00	\$ 3.48	\$ 38.87
March	\$ 0.5181	10,400	\$ 5.39	\$ 30.00	\$ 3.48	\$ 38.87
April	\$ 0.4569	10,400	\$ 4.75	\$ 30.00	\$ 3.48	\$ 38.23
May	\$ 0.4569	10,400	\$ 4.75	\$ 30.00	\$ 3.48	\$ 38.23
June	\$ 0.4569	10,800	\$ 4.93	\$ 30.00	\$ 3.48	\$ 38.41
July	\$ 0.4569	10,800	\$ 4.93	\$ 30.00	\$ 3.48	\$ 38.41
August	\$ 0.4569	10,800	\$ 4.93	\$ 30.00	\$ 3.48	\$ 38.41
September	\$ 0.4569	10,400	\$ 4.75	\$ 30.00	\$ 3.48	\$ 38.23
October	\$ 0.4569	10,400	\$ 4.75	\$ 30.00	\$ 3.48	\$ 38.23
November	\$ 0.5181	10,400	\$ 5.39	\$ 30.00	\$ 3.48	\$ 38.87
December	\$ 0.5181	10,400	\$ 5.39	\$ 30.00	\$ 3.48	\$ 38.87

**Proposed new Peaking Unit Equivalent cost calculation = (Daily Gas Price \* Heat Rate/1000) + Total \$/MWh Adjustment**

- Firm Reservation Rate, per Big Sandy Agreement (\$.20/MMBtu)
- Firm Surcharges, as stated in TCO tariff (\$.0545/MMBtu)
- Firm Transportation Commodity Rate (\$.0104/MMBtu)
- Transportation Retainage, as stated in TCO tariff (1.893% or ~\$0.058 on \$3 gas)
- Park and Lend Rate, as stated in the TCO tariff (\$0.1939 winter and \$0.1327 summer)
- FERC Annual Charge Adjustment (ACA) (\$.0013/MMBtu)

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**DATA REQUEST**

- 1\_6 Refer to Kentucky Power's use of the PUE proxy methodology. Refer also to the Excel file attached to the response to Staff 1-16 named KPCO\_R\_KPSC\_1\_16\_Attachment 2. Refer further to worksheet tab 06-21 Hourly Purch Alloc and the calculation of the Peaking Unit Equivalent \$/MWh in column L. The calculations in column L add a cost of \$33.48 per MWh to the calculated cost of gas to determine the Peaking Unit Equivalent \$/MWh.
- a. Please confirm that the \$33.38 per MWh is added to the cost calculated for each hour in the determination of the Peaking Unit Equivalent \$/MWh for each summer month during 2021. If not confirmed, please explain.
  - b. Please confirm that the \$33.38 per MWh is added to the cost calculated for each hour in the determination of the Peaking Unit Equivalent \$/MWh for each non-summer month during 2021. If not confirmed, please explain.
  - c. Please explain why the \$33.38 per MWh cost is added in each individual hour in column L.
  - d. Please describe what the \$33.38 per MWh addition represents and explain all reasons why it is added to the determination of the Peaking Unit Equivalent \$/MWh.
  - e. Please describe how the \$33.38 per MWh additional amount was determined. In addition, please provide copies of all source documentation and the calculations of this addition in electronic format with all formulas intact.
  - f. Please indicate whether the \$33.38 per MWh addition remains constant in all months and in all years or whether it changes periodically. In addition, describe why it stays the same or why it changes.

**RESPONSE**

- a. Confirmed.
- b. Confirmed.
- c. The \$33.48 cost added to every hour in column L is comprised of a \$30.00 adder for fixed start-up costs plus \$3.48 adder for variable O&M pursuant to the Commission's January 18, 2018 and February 27, 2018 order in Case No. 2017-00179 approving the inclusion of variable O&M and fixed start-up costs in the PUE.

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- d. Please see the Company's response to part c of this question.
- e. Please see Exhibit AEV-8 filed in Case No. 2017-00179 by Company witness Vaughan for the requested information.
- f. The Company has not updated this adder since it was first added to the calculation consistent with the Commission's February 27, 2018 order in Case No. 2017-00179.

Witness: Jason M. Stegall

Kentucky Power Company  
KPSC Case No. 2022-00036  
Commission Staff's Third Set of Data Requests  
Dated June 7, 2022

**DATA REQUEST**

**KPSC 3\_2** For each month in the current six-month review period, provide the amounts of purchased power fuel during scheduled/extended outages and forced outages in both kwh and dollars and the amounts of purchased power cost recovered through the Fuel Adjustment Clause and through the Purchase Power Agreement and any amounts not recovered through either.

**RESPONSE**

The Company requires additional time to complete and confirm its substantive response. Kentucky Power proposes to file its supplemental response to this data request, subject to its motion for an extension filed today, on or before June 22, 2022.

**June 22, 2022, Supplemental Response**

Please see KPCO\_R\_KPSC\_3\_2\_Attachment1 for the requested information to the extent available. Kentucky Power Company does not track purchased power data in the detail requested for scheduled or extended outages. The demand charge referenced on tab "kWh" line No. 9 is not associated with volumetric usage (i.e., kWh), therefore we cannot identify the kWh portion associated with the Purchase Power Agreement. Purchased Power is not solely determined on the basis of kWh.

Witness: Scott E. Bishop

	May 2021	Jun 2021	Jul 2021	Aug 2021	Sep 2021	Oct 2021	Total
Total Purchased Power Expense	\$4,993,884	\$7,334,436	\$6,305,000	\$10,133,280	\$6,332,408	\$13,892,770	\$48,991,778
Less: Purchased Power Recovered through the FAC	\$5,492,357	\$7,079,661	\$6,311,744	\$8,309,733	\$5,621,041	\$13,581,332	\$46,395,868
Less: Purchased Power Recovered through PPA Rider	\$17,789	\$162,620	\$0	\$893,124	\$978,689	\$346,838	\$2,399,061
Net Unrecovered Purchased Power	(\$516,262)	\$92,154	(\$6,744)	\$930,423	(\$267,322)	(\$35,400)	\$196,849

Line No. PPA Costs by Account per the Company's Income Statements

	May 2021	Jun 2021	Jul 2021	Aug 2021	Sep 2021	Oct 2021
1 KYP_CORP_CONSOL						
2 5550001 Purch Pwr-NonTrading-Nonassoc	2,892,363.76	2,092,846.68	660,242.53	3,143,982.20	4,143,520.51	13,034,048.13
3 5550027 Purch Pwr-Non-Fuel Portion-Aff	5,520,707.92	5,877,422.14	5,812,907.60	6,547,681.05	5,644,930.43	6,441,026.38
4 5550039 PJM Inadvertent Mtr Res-OSS	(86.42)	492.10	1,215.71	1,811.92	212.47	(103.46)
5 5550040 PJM Inadvertent Mtr Res-LSE	648.59	1,018.69	4,353.78	7,908.87	1,886.87	(1,028.36)
6 5550046 Purch Power-Fuel Portion-Affil	2,240,778.00	4,224,699.00	4,452,338.00	4,163,148.00	491,687.00	(150,251.00)
7 5550074 PJM Reactive-Charge	174,322.82	185,316.62	175,404.57	176,098.29	172,744.88	175,738.19
8 5550075 PJM Reactive-Credit	(119,572.89)	(119,573.10)	(119,572.89)	(119,572.89)	(115,715.91)	(115,587.12)
9 5550076 PJM Black Start-Charge	70,955.28	70,035.23	70,815.10	69,684.28	72,112.07	72,129.57
10 5550078 PJM Regulation-Charge	5,938.07	6,406.78	9,687.41	34,353.92	40,946.69	93,291.88
11 5550079 PJM Regulation-Credit	(4,103.95)	(3,270.18)	(7,331.07)	(15,474.50)	(19,570.04)	(15,057.02)
12 5550080 PJM Hourly Net Purch.-FERC	585,863.67	1,296,530.95	1,571,096.83	2,590,338.45	2,096,559.01	1,190,623.59
13 5550083 PJM Spinning Reserve-Charge	26,758.90	29,741.08	23,341.48	44,931.96	42,303.18	70,914.22
14 5550084 PJM Spinning Reserve-Credit	(10,596.52)	(3,729.49)	(3,450.66)	(4,942.00)	(2,714.75)	(3,370.37)
15 5550090 PJM 30m Suppl Reserv Charge LSE	1,982.74	4,332.68	9,804.51	12,775.63	10,682.04	3,286.90
16 5550094 Purchased Power - Fuel						
17 5550099 PJM Purchases-non-ECR-Auction						
18 5550123 PJM OpRes-LSE-Charge	36,391.24	31,250.14	63,137.28	106,732.01	41,756.73	52,434.11
19 5550124 PJM Implicit Congestion-LSE	368,523.16	428,512.04	1,309,849.54	1,387,214.31	301,809.85	789,198.89
20 5550132 PJM FTR Revenue-LSE	(461,685.24)	(308,690.27)	(1,298,813.09)	(900,707.31)	(269,515.86)	(486,956.95)
21 5550137 PJM OpRes-LSE-Credit	(2,485.14)	(2,578.10)	(129.32)	(1,179.02)	(1,846.00)	(3,296.87)
22 5550153 PurchPower-Rockport Def-NonAff	(1,249,999.99)	(1,249,999.99)	(1,249,999.99)	(1,249,999.99)	(1,249,999.99)	(1,249,999.99)
23 5550326 PJM Transm Loss Charges - LSE	543,134.04	802,765.34	839,433.95	910,880.96	753,195.58	631,570.62
24 5550327 PJM Transm Loss Credits-LSE	(103,570.25)	(150,350.16)	(204,716.37)	(225,598.51)	(177,645.36)	(194,597.56)
25 5550328 PJM FC Penalty Credit	(1,675.72)	(1,320.50)	(1,707.14)	893.05	(0.86)	(217.09)
26 Total Purchased Power Cost	10,514,592.07	13,211,857.68	12,117,907.76	16,680,960.68	11,977,338.54	20,333,796.69
27						
28 Less: Rockport UPA Demand Cost (5550027)	5,520,707.92	5,877,422.14	5,812,907.60	6,547,681.05	5,644,930.43	6,441,026.38
29						
30 Purchased Power Subject to Rider Recovery	4,993,884.15	7,334,435.54	6,305,000.16	10,133,279.63	6,332,408.11	13,892,770.31
31						
32 Costs Recovered Through the PPA						
33						
34 Current Month Retail Revenue Ratio	98.70%	98.78%	98.79%	98.99%	98.91%	98.68%
Source: the Company's accounting files						
Total FO Replacement Cost Excluded from FAC						
Source: The "TOTAL FO REPLACEMENT COST EXCLUDED FROM FAC" cost as calculated in the monthly Peaking Unit Equivalent ("PUE") Files	18,024.15	164,627.04	-	902,224.26	989,426.98	351,470.66
35						
36 Cost Recovered Through the PPA (Ln 31 * Ln 32)	17,788.94	162,620.25	-	893,123.93	978,689.38	346,838.00
37						
38 FAC Data - Monthly Final Fuel Cost Schedule As Filed						
39						
40 Net Energy Cost Economy Purchases						
41 Identifiable Fuel Cost - Other Purchases	5,537,921.00	7,214,132.00	6,313,099.00	9,534,544.00	6,643,250.00	13,962,570.00
42 Identifiable Fuel Cost Substitute	198,905.00	299,096.00	-	1,579,375.00	1,664,340.00	717,836.00
43 Purchase Adjustment for PUE	27,541.00	-	1,355.00	322,570.00	32,806.00	29,766.00
44 Fuel Cost Assigned During Forced Outages	180,882.00	164,625.00	-	677,134.00	674,937.00	366,364.00
45 Subtotal	5,492,357.00	7,079,661.00	6,311,744.00	8,309,733.00	5,621,041.00	13,581,332.00

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

**APPLICABLE.**

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

**RATE.**

The annual purchase power adjustment factor will be computed using the following formula:

1. Annual Purchase Power Net Costs (PPANC)

$$PPANC = N + CSIRP + OATT + RKP + RP - BPP$$

Where:

BPP = The annual amount of purchase power costs included in base rates, \$98,165,699.

- a. N = The annual cost of power purchased by the Company through new Purchase Power Agreements and purchased power expense from avoided cost payments to net metering customers under tariff N.M.S.II. All new purchase power agreements shall be approved by the Commission to the extent required by KRS 278.300.
- b. CSIRP = The net annual cost of any credits provided to customers under Tariff C.S.-I.R.P., Tariff D.R.S., Tariff V.C.S. and special contracts for interruptible service above or below the \$454,997 included in BPP.
- c. OATT = 100% The net annual PJM load-serving entity Open Access Transmission Tariff Charges above or below the \$96,896,495 included in BPP, less the transmission return difference pursuant to the Commission approved Settlement agreement in Case No. 2017-00179.
- d. RKP = Rockport related items includable in Tariff PPA pursuant to the Commission approved Settlement agreement in Case No. 2017-00179:
  - 1. Increase in Rockport collection resulting from reduction in base rate deferral;
  - 2. Rockport deferral amount to be recovered;
  - 3. Rockport fixed cost savings; and
  - 4. Rockport offset estimate and true-up.
  - 5. Final (over)/under recovery associated with tariff CC following its expiration
- e. RP = The cost of fuel related to substitute generation less the cost of fuel which would have been used in plants suffering forced generation or transmission outages above or below the \$814,208 included in BPP.

(Cont'd on Sheet No. 35-2)

DATE OF ISSUE: December 28, 2021  
DATE EFFECTIVE: Service Rendered On And After January 28, 2022  
ISSUED BY: /s/ Brian K. West  
TITLE: Vice President, Regulatory & Finance  
By Authority Of an Order of the Public Service Commission  
In Case No. XXXX-XXXXX Dated XXXX XX, XXXX

<b>KENTUCKY PUBLIC SERVICE COMMISSION</b>
<b>Linda C. Bridwell</b> Executive Director

EFFECTIVE <b>1/28/2022</b> PURSUANT TO 807 KAR 5:011 SECTION 9 (1)

**TARIFF P.P.A. (Cont'd)**  
**(Purchase Power Adjustment)**

RATES.

Tariff Class	\$/kWh	\$/kW
R.S., R.S.-L.M.-T.O.D., R.S.-T.O.D., and R.S.-T.O.D. 2, R.S.D.	\$0.00594	--
S.G.S.-T.O.D.	\$0.00483	--
M.G.S.-T.O.D.	\$0.00483	--
G.S.	\$0.00483	--
L.G.S., L.G.S.-T.O.D.	\$0.00012	\$1.40
L.G.S.-L.M.-T.O.D.	\$0.00443	--
I.G.S. and C.S.-I.R.P.	\$0.00012	\$1.66
M.W.	\$0.00330	--
O.L.	\$0.00075	--
S.L.	\$0.00075	--

The kWh factor as calculated above will be applied to all billing kilowatt-hours for those tariff classes listed above. The kW factor as calculated above will be applied to all on-peak and minimum billing demand kW for the LGS, LGS-T.O.D, IGS, and CS-I.R.P. tariff classes.

The Purchase Power Adjustment factors shall be modified annually using the following formula:

The Purchase Power Adjustment factors shall be determined as follows:

For all tariff classes without demand billing:

$$\text{kWh Factor} = \frac{\text{PPA(E)} \times (\text{BE}_{\text{Class}} / \text{BE}_{\text{Total}}) + \text{PPA(D)} \times (\text{CP}_{\text{Class}} / \text{CP}_{\text{Total}})}{\text{BE}_{\text{Class}}}$$

$$\text{kW Factor} = 0$$

For all tariff classes with demand billing:

$$\text{kWh Factor} = \frac{\text{PPA(E)} \times (\text{BE}_{\text{Class}} / \text{BE}_{\text{Total}})}{\text{BE}_{\text{Class}}}$$

$$\text{kW Factor} = \frac{\text{PPA(D)} \times (\text{CP}_{\text{Class}} / \text{CP}_{\text{Total}})}{\text{BD}_{\text{Class}}}$$

(Cont'd on Sheet No. 35-3)

DATE OF ISSUE: August 19, 2021  
 DATE EFFECTIVE: Service Rendered On And After September 28, 2021  
 ISSUED BY: /s/ Brian K. West  
 TITLE: Vice President, Regulatory & Finance  
 By Authority Of an Order of the Public Service Commission  
 In Case No. XXXX-XXXXX Dated XXXX XX, XXXX

<b>KENTUCKY PUBLIC SERVICE COMMISSION</b>
<b>Linda C. Bridwell</b> Executive Director

<b>EFFECTIVE</b> <b>9/28/2021</b> PURSUANT TO 807 KAR 5:011 SECTION 9 (1)

**TARIFF P.P.A. (Cont'd)**  
**(Purchase Power Adjustment)**

**RATES. (Cont'd)**

Where:

1. "PPA(D)" is the actual annual retail PPA demand-related costs, plus any prior review period (over)/under recovery.
2. "PPA(E)" is the actual annual retail PPA energy-related costs, plus any prior review period (over)/under recovery.
3. "BE<sub>Class</sub>" is the historic annual retail jurisdictional billing kWh for each tariff class for the current year.
4. "BD<sub>Class</sub>" is the historic annual retail jurisdictional billing kW for each applicable tariff class for the current year.
5. "CP<sub>Class</sub>" is the coincident peak demand for each tariff class estimated as follows:

Tariff Class	BE <sub>Class</sub>	CP/kWh Ratio	CP <sub>Class</sub>
R.S., R.S.-L.M.-T.O.D., R.S.-T.O.D., and R.S.-T.O.D. 2, R.S.D.		0.02428%	
S.G.S.-T.O.D.		0.01962%	
M.G.S.-T.O.D.		0.01962%	
G.S.		0.01962%	
L.G.S., L.G.S.-T.O.D		0.01798%	
L.G.S.-L.M.-T.O.D.		0.01798%	
I.G.S. and C.S.-I.R.P.		0.01232%	
M.W.		0.01326%	
O.L.		0.00263%	
S.L.		0.00262%	

6. "BE<sub>Total</sub>" is the sum of the BE<sub>Class</sub> for all tariff classes.
7. "CP<sub>Total</sub>" is the sum of the CP<sub>Class</sub> for all tariff classes.
8. The factors as computed above are calculated to allow the recovery of Uncollectible Accounts Expense of 0.41% and the KPSC Maintenance Fee of 0.1956% and other similar revenue based taxes or assessments occasioned by the Purchase Power Adjustment Rider revenues.
9. The annual PPA factors shall be filed with the Commission by August 15 of each year, with rates to begin with the October billing period, along with all necessary supporting data to justify the amount of the adjustments, which shall include data and information as may be required by the Commission.

Copies of all documents required to be filed with the Commission shall be open and made available for public inspection at the office of the Public Service Commission pursuant to the provisions of KRS 61.870 to 61.884.

DATE OF ISSUE: April 9, 2021  
 DATE EFFECTIVE: Service Rendered On And After January 14, 2021  
 ISSUED BY: /s/ Brian K. West  
 TITLE: Vice President, Regulatory & Finance  
 By Authority of Orders of the Public Service Commission  
 In Case No. 2020-00174 dated January 13, 2021; January 15, 2021; February 22, 2021, and March 17, 2021

<b>KENTUCKY PUBLIC SERVICE COMMISSION</b>
Linda C. Bridwell Executive Director

EFFECTIVE <b>1/14/2021</b> PURSUANT TO 807 KAR 5:011 SECTION 9 (1)

Kentucky Power Company  
KPSC Case No. 2022-00036  
KIUC First Set of Data Requests  
Dated May 9, 2022

DATA REQUEST

1\_3

- With respect to the FAC limitation on the recovery of purchase power costs due to forced outages:
- a. Please confirm that the limitation on the recovery of purchase power costs due to forced outages has not been applied by Kentucky Power with respect to Rockport.
  - b. Please explain why the forced outage limitation does not apply to Rockport.
  - c. If there is a Commission decision addressing the recovery of purchase power costs due to forced outages at Rockport please provide a citation.

RESPONSE

- a. Not applicable. The limitation is not applicable because Kentucky Power receives its share of Rockport generation through a Unit Power Agreement.
- b. The Company does not have an ownership or leased interest in the Rockport Plant. Kentucky Power receives its share of Rockport generation through a Unit Power Agreement.
- c. The Company is not aware of a Commission order addressing recovery of purchase power costs due to forced outages *specifically* at Rockport.

Witness: Scott E. Bishop

DAY AND HOUR ENDING	STEP 1 & 3			STEP 2										(14a)	(15)	(16)																															
	(1)	(2)	(3)	(3a)	(4)	(5)	(5a)	(6)	(7)	(8)	(9)	(10)	(11)				(12)	(13)	(14)																												
	FORCED OUTAGE (FO) VOLUME FROM LASOR			TOTAL FO			PURCHASES ASSIGNED TO INTERNAL LOAD (MWh)	MARGINAL LOSSES	MINIMUM OF (2) OR (3)	INCLUDE ONLY IF FO > 6 HOURS REQUIRES PURCHASES (Step 1)	DISPATCHED GENERATION	NET AVAILABLE GENERATION RESOURCES	INTERNAL LOAD	PURCHASES DUE TO DEFICIENCY (Step 2)	PURCHASES DUE TO F.O. DEFICIENCY (MIN STEP 1 OR 2)	Net Position = Gen + losses + purchases - Load	MAX FO VOLUME REQUIRING REPLACEMENT POWER			AVERAGE PRICE OF PURCHASED POWER	TOTAL COST OF REPLACEMENT POWER DUE TO FO	FO UNIT FUEL COST FROM MONTHLY NET ENERGY REQUIREMENT REPORT			Highest of PUE or Generation Cost \$/MWh	TOTAL ALLOWABLE FO REPLACEMENT COST	TOTAL FO REPLACEMENT COST EXCLUDED FROM FAC																				
	Mitchell 1 KP (385)	Mitchell 2 KP (395)	Big Sandy 1 (295)	Total	Counter	Include	INPUT FROM KP Hourly Purch Alloc Tab	INPUT FROM PT	MIN (2), (3)	(4) >0 for > 6 hours	INPUT FROM POWER TRACKER	INPUT FROM POWER TRACKER	INPUT FROM POWER TRACKER	MAX ((7)-(6),0)	MIN (5),(8)	(3) + (3a) + (5a) - (7)	Mitchell 1	Mitchell 2	BS 1	INPUT FROM PowerTracker	Σ((11.) x (12))	Mitchell 1	Mitchell 2	BS1	Input from PUE Analysis	Σ ((11.) X (14.))	(13) - (15)																				
BIG SANDY U1 HAD NO FORCED OUTAGES THIS MONTH																	129,478	226,638	37,857																												
MITCHELL UNIT 2 HAD TWO FORCED OUTAGES THIS MONTH																																															
MITCHELL UNIT NO THREE FORCED OUTAGES THIS MONTH																																															
08/02/2021 00				-	-	-	36	8	-	-	682	920	560	-	-	-	-	-	-	\$ 24.233	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -																			
08/02/2021 01				-	-	-	44	7	-	-	582	920	532	-	-	-	-	-	-	\$ 22.073	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -																			
08/02/2021 02				-	-	-	6	6	-	-	519	920	514	-	-	-	-	-	-	\$ 20.669	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -																			
08/02/2021 03				-	-	-	34	6	-	-	467	917	494	-	-	-	-	-	-	\$ 21.661	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -																			
08/02/2021 04				-	-	-	16	6	-	-	472	920	488	-	-	-	-	-	-	\$ 20.838	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -																			
08/02/2021 05				-	-	-	13	6	-	-	467	918	482	-	-	-	-	-	-	\$ 21.777	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -																			
08/02/2021 06				-	-	-	33	6	-	-	472	920	494	-	-	-	-	-	-	\$ 22.175	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -																			
08/02/2021 07				-	-	-	142	7	-	-	467	910	509	-	-	-	-	-	-	\$ 20.534	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -																			
08/02/2021 08				-	-	-	77	7	-	-	473	920	533	-	-	-	-	-	-	\$ 25.663	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -																			
08/02/2021 09				-	-	-	197	7	-	-	469	749	554	-	-	-	-	-	-	\$ 23.585	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -																			
08/02/2021 10				-	-	-	115	8	-	-	493	920	587	-	-	-	-	-	-	\$ 30.514	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -																			
08/02/2021 11				-	-	-	6	9	-	-	583	920	631	-	-	-	-	-	-	\$ 177.896	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -																			
08/02/2021 12				-	-	-	(43)	10	(43)	-	695	920	666	-	-	-	-	-	-	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -																			
08/02/2021 13				-	-	-	(66)	11	(66)	-	736	921	702	-	-	-	-	-	-	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -																			
08/02/2021 14				-	-	-	(44)	12	(44)	-	781	922	731	-	-	-	-	-	-	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -																			
08/02/2021 15				-	-	-	(2)	12	(2)	-	799	922	750	-	-	-	-	-	-	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -																			
08/02/2021 16				-	-	-	3	12	-	-	800	923	767	-	-	-	-	-	-	\$ 237.363	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -																			
08/02/2021 17				-	-	-	(18)	12	(18)	-	805	925	764	-	-	-	-	-	-	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -																			
08/02/2021 18				-	-	-	81	12	-	-	816	925	764	-	-	-	-	-	-	\$ 66.500	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -																			
08/02/2021 19				-	-	-	(60)	12	(60)	-	808	925	744	-	-	-	-	-	-	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -																			
08/02/2021 20				-	-	-	(4)	11	(4)	-	808	924	713	-	-	-	-	-	-	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -																			
08/02/2021 21				-	-	-	(24)	11	(24)	-	795	922	683	-	-	-	-	-	-	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -																			
08/02/2021 22				-	-	-	28	10	-	-	787	922	667	-	-	-	-	-	-	\$ 53.680	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -																			
08/02/2021 23				-	-	-	35	9	-	-	748	920	617	-	-	-	-	-	-	\$ (16.198)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -																			
<b>Total</b>																	<b>122,237.50</b>	<b>60,527.49</b>	<b>8,259.66</b>	<b>512,306.31</b>	<b>671,825.70</b>	<b>501,746.94</b>	<b>27,425.416</b>	<b>-</b>	<b>-</b>	<b>\$ 57.588</b>	<b>\$ 1,579,369.68</b>	<b>\$ 24.690</b>	<b>\$ 677,145.42</b>	<b>\$ 902,224.26</b>	<b>32.90</b>																

27,425,416 kWh

Based on a 24-hour day, you will have to add an hour/subtract an hour for Daylight savings changes

Generation and Fuel Cost data from NER

Day/Hour Ending	Total KP Purchases		KP Purchases allocated to OSS		KP Purchases allocated to Internal Load		Purchases Assigned to Internal Load Due to Forced Outage MW	Purchases Assigned to Internal Load Not Due to Forced Outage MW	\$/ MWh of Purchases allocated to Internal Load	Daily Gas Price	Peaking Unit Equivalent \$/MWh	Generation and Fuel Cost data from NER					Highest of PUE or Generation Cost \$/MWh	Difference in \$/MWh	Total Difference in PUE & Purchase Price \$
	KP Mwh	KP Dollars	KP Mwh	KP Dollars	KP Mwh	KP Dollars						MW Generated	MW Generated	MW Generated	MW Generated	MW Generated			
												37,857	129,478	226,638	39,365	78,968			
											Update for Jun-Aug	\$2,078,026.61	\$3,208,406.27	\$4,722,780.58	\$1,299,384.57	\$2,500,838.48			
08/02/2021 00	43.03	1,051.90	6.78	173.42	36.25	878.48	-	36.25	24.233	\$3.49	71.172	54.892	24.780	20.838	33.008	31.669	71.172	0	0.00
08/02/2021 01	43.57	961.63	-	-	43.57	961.63	-	43.57	22.073	\$3.49	71.172	54.892	24.780	20.838	33.008	31.669	71.172	0	0.00
08/02/2021 02	6.41	132.51	-	-	6.41	132.51	-	6.41	20.669	\$3.49	71.172	54.892	24.780	20.838	33.008	31.669	71.172	0	0.00
08/02/2021 03	34.40	745.10	-	-	34.40	745.10	-	34.40	21.661	\$3.49	71.172	54.892	24.780	20.838	33.008	31.669	71.172	0	0.00
08/02/2021 04	26.55	561.91	10.54	228.29	16.01	333.62	-	16.01	20.838	\$3.49	71.172	54.892	24.780	20.838	33.008	31.669	71.172	0	0.00
08/02/2021 05	21.93	472.15	8.77	185.53	13.16	286.62	-	13.16	21.777	\$3.49	71.172	54.892	24.780	20.838	33.008	31.669	71.172	0	0.00
08/02/2021 06	43.58	959.52	10.51	226.35	33.06	733.18	-	33.06	22.175	\$3.49	71.172	54.892	24.780	20.838	33.008	31.669	71.172	0	0.00
08/02/2021 07	162.38	3,364.57	20.43	449.94	141.94	2,914.64	-	141.94	20.534	\$3.49	71.172	54.892	24.780	20.838	33.008	31.669	71.172	0	0.00
08/02/2021 08	200.64	4,538.43	123.55	2,560.01	77.09	1,978.42	-	77.09	25.663	\$3.49	71.172	54.892	24.780	20.838	33.008	31.669	71.172	0	0.00
08/02/2021 09	336.34	7,798.40	139.13	3,147.16	197.21	4,651.24	-	197.21	23.585	\$3.49	71.172	54.892	24.780	20.838	33.008	31.669	71.172	0	0.00
08/02/2021 10	367.96	9,372.23	253.22	5,871.15	114.74	3,501.09	-	114.74	30.514	\$3.49	71.172	54.892	24.780	20.838	33.008	31.669	71.172	0	0.00
08/02/2021 11	286.95	8,183.90	281.21	7,162.78	5.74	1,021.12	-	5.74	177.896	\$3.49	71.172	54.892	24.780	20.838	33.008	31.669	71.172	106.7239164	612.60
08/02/2021 12	205.06	8,124.89	247.80	7,067.19	(42.74)	1,057.70	-	(42.74)	0.000	\$3.49	71.172	54.892	24.780	20.838	33.008	31.669	71.172	0	0.00
08/02/2021 13	139.00	5,868.01	205.06	8,124.89	(66.05)	(2,256.88)	-	(66.05)	0.000	\$3.49	71.172	54.892	24.780	20.838	33.008	31.669	71.172	0	0.00
08/02/2021 14	94.98	3,520.23	139.00	5,868.01	(44.03)	(2,347.78)	-	(44.03)	0.000	\$3.49	71.172	54.892	24.780	20.838	33.008	31.669	71.172	0	0.00
08/02/2021 15	93.38	3,073.83	94.98	3,520.23	(1.59)	(446.40)	-	(1.59)	0.000	\$3.49	71.172	54.892	24.780	20.838	33.008	31.669	71.172	0	0.00
08/02/2021 16	96.41	3,792.33	93.38	3,073.83	3.03	718.50	-	3.03	237.363	\$3.49	71.172	54.892	24.780	20.838	33.008	31.669	71.172	166.191292	503.06
08/02/2021 17	78.76	3,821.19	96.41	3,792.33	(17.65)	28.86	-	(17.65)	0.000	\$3.49	71.172	54.892	24.780	20.838	33.008	31.669	71.172	0	0.00
08/02/2021 18	160.16	9,233.85	78.76	3,821.19	81.39	5,412.66	-	81.39	66.500	\$3.49	71.172	54.892	24.780	20.838	33.008	31.669	71.172	0	0.00
08/02/2021 19	100.27	4,132.45	160.16	9,233.85	(59.89)	(5,101.41)	-	(59.89)	0.000	\$3.49	71.172	54.892	24.780	20.838	33.008	31.669	71.172	0	0.00
08/02/2021 20	96.20	4,824.28	100.27	4,132.45	(4.07)	691.84	-	(4.07)	0.000	\$3.49	71.172	54.892	24.780	20.838	33.008	31.669	71.172	0	0.00
08/02/2021 21	72.64	2,432.09	96.20	4,824.28	(23.56)	(2,392.20)	-	(23.56)	0.000	\$3.49	71.172	54.892	24.780	20.838	33.008	31.669	71.172	0	0.00
08/02/2021 22	100.78	3,942.59	72.64	2,432.09	28.14	1,510.50	-	28.14	53.680	\$3.49	71.172	54.892	24.780	20.838	33.008	31.669	71.172	0	0.00
08/02/2021 23	135.69	3,377.16	100.78	3,942.59	34.91	(565.43)	-	34.91	-16.198	\$3.49	71.172	54.892	24.780	20.838	33.008	31.669	71.172	0	0.00
	<b>113,923.04</b>	<b>5,734,320.52</b>	-	-	<b>60,527.49</b>	<b>3,145,704.04</b>	<b>27,135.61</b>	<b>33,391.88</b>	<b>37,716.30</b>		<b>57,609.79</b>	<b>40,839.33</b>	<b>18,436.01</b>	<b>15,503.78</b>	<b>24,558.14</b>	<b>23,561.77</b>	<b>57609.792</b>	<b>24,113.15</b>	<b>322,569.63</b>

Purchase Cost comparison to PUE

Avg Purch Cost - Internal	Min Daily Gas Price	75% of Min	
\$51.97	3.490	\$28.27	Update for Jun-Aug
		Difference	
		\$23.70	PUE calc is applicable

**Kentucky Power Company**  
**Average and Maximum Market Purchases (Non-Rockport)**  
**Assigned to Native Load Not Due to Forced Outages**  
**MW**

Month	Market Purchases (Non-Rockport) Assigned to Native Load Not Due to Forced Outages MW (1)	Hours In Month	Average Market Purchases (Non-Rockport) Assigned to Native Load Not Due to Forced Outages MW	Maximum Hourly Market Purchases (Non-Rockport) Assigned to Native Load Not Due to Forced Outages MW (2)	Hour in Which Maximum Market Purchases (Non-Rockport) Occurred MW (3)	Internal Load In Same Hour MW (4)	Non-Rockport \$/MWh Purchase Power Cost In Same Hour (5)	Peaking Unit Equivalent \$/MWh In Same Hour (6)
May-21	109,853.93	744	147.65	320.27	05/21 hour 13	669	\$24.628	\$63.848
June-21	63,321.88	720	87.95	395.57	06/23 hour 17	692	\$26.042	\$67.026
July-21	24,761.15	744	33.28	234.92	07/27 hour 08	580	\$25.359	\$75.168
August-21	33,391.88	744	44.88	265.50	08/08 hour 18	844	\$68.411	\$78.300
September-21	64,776.86	720	89.97	376.65	09/19 hour 11	598	\$38.746	\$87.144
October-21	213,045.65	744	286.35	658.19	10/27 hour 09	670	\$66.552	\$93.176

(1) Company's Response to Staff 1-16 Attachments 1-6, Monthly Hourly Purch Alloc Worksheet Tabs, Sum of Cell Column I.

(2) Company's Response to Staff 1-16 Attachments 1-6, Monthly Hourly Purch Alloc Worksheet Tabs, Highest Hourly MW in Cell Column I.

(3) Company's Response to Staff 1-16 Attachments 1-6, Monthly Hourly Purch Alloc Worksheet Tabs, Corresponding Hour in Column A to Highest Hourly MW.

(4) Company's Response to Staff 1-16 Attachments 1-6, Monthly Dated Tabs (First Tab in Each File), Corresponding Native Load MW Hour in Column N to Highest Hourly MW.

(5) Company's Response to Staff 1-16 Attachments 1-6, Monthly Hourly Purch Alloc Worksheet Tabs, \$/ MWh of Purchases allocated to Internal Load.

(6) Company's Response to Staff 1-16 Attachments 1-6, Monthly Hourly Purch Alloc Worksheet Tabs, Peaking Unit Equivalent \$/MWh.

Kentucky Power Company  
October 2021 Selected Data

Month	Sum of Native Load MWh for All Hours in Month (1)	Hours in Month	Average Hourly Native Load MW	Total Dispatched Generation MWh for All Hours in Month (2)	Sum of Market Purchases (Non-Rockport) Assigned to Native Load MWh (3)	Sum of Market Purchases (Non-Rockport) Assigned to Native Load \$ (4)	Average Cost of Market Purchases (Non-Rockport) Assigned to Native Load \$/MWh (5)	Average Peaking Unit Equivalent \$/MWh (6)	PUE FAC Disallowance \$ (7)
October	385,394	744	518.0	161,490	225,252	\$ 12,923,530	\$ 57.37	\$ 86.49	\$ 29,766

Generating Unit	Dispatched Generation MWh (8)	KPCO Capacity MW (9)	Max Generation for Month MWh	Capacity Factor	Average Cost per MWh (10)	Forced Outages MWh (11)	Fuel Costs Assigned During Forced Outages \$ (12)	Purchase Costs Substituted During Forced Outages \$ (13)	Forced Outage Replacement Costs Removed From FAC \$ (14)
Big Sandy 1	0	295	219,480	0%	\$ -				
Mitchell 1	27,613	385	286,440	10%	\$ 30.01	12,206	\$ 366,361	\$ 717,832	\$ 351,471
Mitchell 2	133,877	395	293,880	46%	\$ 20.74				
Rockport 1	0	198	147,312	0%	\$ -				
Rockport 2	0	195	145,080	0%	\$ -				
<b>Total</b>	<b>161,490</b>	<b>1,468</b>	<b>1,092,192</b>	<b>15%</b>		<b>12,206</b>	<b>\$ 366,361</b>	<b>\$ 717,832</b>	<b>\$ 351,471</b>

- (1) Company's Response to Staff 1-16 Attachment 6, 10-2021 Worksheet Tab, Cell N756
- (2) Company's Response to Staff 1-16 Attachment 6, 10-21 Hourly Purch Alloc Worksheet Tab, Cells M3 through Q3. Matches FAC page 3 of 5.
- (3) Company's Response to Staff 1-16 Attachment 6, 10-21 Hourly Purch Alloc Worksheet Tab, Cell F750
- (4) Company's Response to Staff 1-16 Attachment 6, 10-21 Hourly Purch Alloc Worksheet Tab, Cell G750
- (5) Company's Response to Staff 1-16 Attachment 6, 10-21 Hourly Purch Alloc Worksheet Tab, Cell G754
- (6) Company's Response to Staff 1-16 Attachment 6, 10-21 Hourly Purch Alloc Worksheet Tab, Average of Cell Column L
- (7) Company's Response to Staff 1-16 Attachment 6, 10-21 Hourly Purch Alloc Worksheet Tab, Cell T750, Matches FAC Final Fuel Cost Schedule for October 2021 Actual Results Filed with November 2021 Estimated Fuel Costs page 5 of 5
- (8) Company's Response to Staff 1-16 Attachment 6, 10-21 Hourly Purch Alloc Worksheet Tab, Cells M3 through Q3
- (9) Company's Response to Staff 1-16 Attachment 6, 10-21 KPCo Gen Data Worksheet Tab
- (10) Company's Response to Staff 1-16 Attachment 6, 10-21 Hourly Purch Alloc Worksheet Tab, Cell Columns M through Q
- (11) Company's Response to Staff 1-16 Attachment 6, 10-2021 Worksheet Tab, Cell R757, Matches FAC Final Fuel Cost Schedule
- (12) Company's Response to Staff 1-16 Attachment 6, 10-2021 Worksheet Tab, Cell AA757, Matches FAC Final Fuel Cost Schedule
- (13) Company's Response to Staff 1-16 Attachment 6, 10-2021 Worksheet Tab, Cell V757, Matches FAC Final Fuel Cost Schedule
- (14) Company's Response to Staff 1-16 Attachment 6, 10-2021 Worksheet Tab, Cell AB757, Matches FAC Final Fuel Cost Schedule

Kentucky Power Company  
September 2021 Selected Data

Month	Sum of Native Load MWh for All Hours in Month (1)	Hours in Month	Average Hourly Native Load MW	Total Dispatched Generation MWh for All Hours in Month (2)	Sum of Market Purchases (Non-Rockport) Assigned to Native Load MWh (3)	Sum of Market Purchases (Non-Rockport) Assigned to Native Load \$ (4)	Average Cost of Market Purchases (Non-Rockport) Assigned to Native Load \$/MWh (5)	Average Peaking Unit Equivalent \$/MWh (6)	PUE FAC Disallowance \$ (7)
September	425,394	720	590.8	365,342	91,050	\$ 4,209,361	\$ 46.23	\$ 82.86	\$ 32,806

Generating Unit	Dispatched Generation MWh (8)	KPCO Capacity MW (9)	Max Generation for Month MWh	Capacity Factor	Average Cost per MWh (10)	Forced Outages MWh (11)	Fuel Costs Assigned During Forced Outages \$ (12)	Purchase Costs Substituted During Forced Outages \$ (13)	Forced Outage Replacement Costs Removed From FAC \$ (14)
Big Sandy 1	65,375	295	212,400	31%	\$ 54.97				
Mitchell 1	130,815	385	277,200	47%	\$ 25.69	26,273	\$ 674,926	\$ 1,664,353	\$ 989,427
Mitchell 2	157,126	395	284,400	55%	\$ 22.43				
Rockport 1	0	198	142,560	0%	\$ -				
Rockport 2	12,025	195	140,400	9%	\$ 33.53				
<b>Total</b>	<b>365,342</b>	<b>1,468</b>	<b>1,056,960</b>	<b>35%</b>		<b>26,273</b>	<b>\$ 674,926</b>	<b>\$ 1,664,353</b>	<b>\$ 989,427</b>

- (1) Company's Response to Staff 1-16 Attachment 5, 09-2021 Worksheet Tab, Cell N732
- (2) Company's Response to Staff 1-16 Attachment 5, 09-21 Hourly Purch Alloc Worksheet Tab, Cells M3 through Q3 and 09-2021 Worksheet Tab, Cell L732
- (3) Company's Response to Staff 1-16 Attachment 5, 09-21 Hourly Purch Alloc Worksheet Tab, Cell F726
- (4) Company's Response to Staff 1-16 Attachment 5, 09-21 Hourly Purch Alloc Worksheet Tab, Cell G726
- (5) Company's Response to Staff 1-16 Attachment 5, 09-21 Hourly Purch Alloc Worksheet Tab, Cell G730
- (6) Company's Response to Staff 1-16 Attachment 5, 09-21 Hourly Purch Alloc Worksheet Tab, Average of Cell Column L
- (7) Company's Response to Staff 1-16 Attachment 5, 09-21 Hourly Purch Alloc Worksheet Tab, Cell T726, Matches FAC Final Fuel Cost Schedule for September 2021 Actual Results Filed with October 2021 Estimated Fuel Costs page 5 of 5
- (8) Company's Response to Staff 1-16 Attachment 5, 09-21 Hourly Purch Alloc Worksheet Tab, Cells M3 through Q3
- (9) Company's Response to Staff 1-16 Attachment 5, 09-21 KPCo Gen Data Worksheet Tab
- (10) Company's Response to Staff 1-16 Attachment 5, 09-21 Hourly Purch Alloc Worksheet Tab, Cell Columns M through Q
- (11) Company's Response to Staff 1-16 Attachment 5, 09-2021 Worksheet Tab, Cell R733, Matches FAC Final Fuel Cost Schedule
- (12) Company's Response to Staff 1-16 Attachment 5, 09-2021 Worksheet Tab, Cell AA733, Matches FAC Final Fuel Cost Schedule
- (13) Company's Response to Staff 1-16 Attachment 5, 09-2021 Worksheet Tab, Cell V733, Matches FAC Final Fuel Cost Schedule
- (14) Company's Response to Staff 1-16 Attachment 5, 09-2021 Worksheet Tab, Cell AB733, Matches FAC Final Fuel Cost Schedule

Kentucky Power Company  
August 2021 Selected Data

Month	Sum of Native Load MWh for All Hours in Month (1)	Hours in Month	Average Hourly Native Load MW	Total Dispatched Generation MWh for All Hours in Month (2)	Sum of Market Purchases (Non-Rockport) Assigned to Native Load MWh (3)	Sum of Market Purchases (Non-Rockport) Assigned to Native Load \$ (4)	Average Cost of Market Purchases (Non-Rockport) Assigned to Native Load \$/MWh (5)	Average Peaking Unit Equivalent \$/MWh (6)	PUE FAC Disallowance \$ (7)
August	501,747	744	674.4	512,306	60,527	\$ 3,145,704	\$ 51.97	\$ 77.43	\$ 322,570

Generating Unit	Dispatched Generation MWh (8)	KPCO Capability MW (9)	Max Generation for Month MWh	Capacity Factor	Average Cost per MWh (10)	Forced Outages MWh (11)	Fuel Costs Assigned During Forced Outages \$ (12)	Purchase Costs Substituted During Forced Outages \$ (13)	Forced Outage Replacement Costs Removed From FAC \$ (14)
Big Sandy 1	37,857	295	219,480	17%	\$ 54.89				
Mitchell 1	129,478	385	286,440	45%	\$ 24.78	27,425	\$ 677,145	\$ 1,579,370	\$ 902,224
Mitchell 2	226,638	395	293,880	77%	\$ 20.84				
Rockport 1	39,365	198	147,312	27%	\$ 33.01				
Rockport 2	78,968	195	145,080	54%	\$ 31.67				
<b>Total</b>	<b>512,306</b>	<b>1,468</b>	<b>1,092,192</b>	<b>47%</b>		<b>27,425</b>	<b>\$ 677,145</b>	<b>\$ 1,579,370</b>	<b>\$ 902,224</b>

(1) Company's Response to Staff 1-16 Attachment 4, 08-2021 Worksheet Tab, Cell N756

(2) Company's Response to Staff 1-16 Attachment 4, 08-21 Hourly Purch Alloc Worksheet Tab, Cells M3 through Q3 and 05-2021 Worksheet Tab, Cell L756

(3) Company's Response to Staff 1-16 Attachment 4, 08-21 Hourly Purch Alloc Worksheet Tab, Cell F750

(4) Company's Response to Staff 1-16 Attachment 4, 08-21 Hourly Purch Alloc Worksheet Tab, Cell G750

(5) Company's Response to Staff 1-16 Attachment 4, 08-21 Hourly Purch Alloc Worksheet Tab, Cell G754

(6) Company's Response to Staff 1-16 Attachment 4, 08-21 Hourly Purch Alloc Worksheet Tab, Average of Cell Column L

(7) Company's Response to Staff 1-16 Attachment 4, 08-21 Hourly Purch Alloc Worksheet Tab, Cell T750, Matches FAC Final Fuel Cost Schedule for August 2021 Actual Results Filed with September 2021 Estimated Fuel Costs page 5 of 5

(8) Company's Response to Staff 1-16 Attachment 4, 08-21 Hourly Purch Alloc Worksheet Tab, Cells M3 through Q3

(9) Company's Response to Staff 1-16 Attachment 4, 08-21 KPCo Gen Data Worksheet Tab

(10) Company's Response to Staff 1-16 Attachment 4, 08-21 Hourly Purch Alloc Worksheet Tab, Cell Columns M through Q

(11) Company's Response to Staff 1-16 Attachment 4, 08-2021 Worksheet Tab, Cell R757, Matches FAC Final Fuel Cost Schedule

(12) Company's Response to Staff 1-16 Attachment 4, 08-2021 Worksheet Tab, Cell AA757, Matches FAC Final Fuel Cost Schedule

(13) Company's Response to Staff 1-16 Attachment 4, 08-2021 Worksheet Tab, Cell V757, Matches FAC Final Fuel Cost Schedule

(14) Company's Response to Staff 1-16 Attachment 4, 08-2021 Worksheet Tab, Cell AB757, Matches FAC Final Fuel Cost Schedule

Kentucky Power Company  
July 2021 Selected Data

Month	Sum of Native Load MWh for All Hours in Month (1)	Hours in Month	Average Hourly Native Load MW	Total Dispatched Generation MWh for All Hours in Month (2)	Sum of Market Purchases (Non-Rockport) Assigned to Native Load MWh (3)	Sum of Market Purchases (Non-Rockport) Assigned to Native Load \$ (4)	Average Cost of Market Purchases (Non-Rockport) Assigned to Native Load \$/MWh (5)	Average Peaking Unit Equivalent \$/MWh (6)	PUE FAC Disallowance \$ (7)
July	493,608	744	663.5	583,941	24,761	\$ 755,860	\$ 30.53	\$ 72.14	\$ 1,355

Generating Unit	Dispatched Generation MWh (8)	KPCO Capability MW (9)	Max Generation for Month MWh	Capacity Factor	Average Cost per MWh (10)	Forced Outages MWh (11)	Fuel Costs Assigned During Forced Outages \$ (12)	Purchase Costs Substituted During Forced Outages \$ (13)	Forced Outage Replacement Costs Removed From FAC \$ (14)
Big Sandy 1	98,070	295	219,480	45%	\$ 38.99				
Mitchell 1	155,078	385	286,440	54%	\$ 23.73				
Mitchell 2	209,026	395	293,880	71%	\$ 21.55				
Rockport 1	55,541	198	147,312	38%	\$ 33.44				
Rockport 2	66,227	195	145,080	46%	\$ 33.46				
<b>Total</b>	<b>583,941</b>	<b>1,468</b>	<b>1,092,192</b>	<b>53%</b>		<b>-</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ -</b>

- (1) Company's Response to Staff 1-16 Attachment 3, 07-2021 Worksheet Tab, Cell N756
- (2) Company's Response to Staff 1-16 Attachment 3, 07-21 Hourly Purch Alloc Worksheet Tab, Cells M3 through Q3 and 07-2021 Worksheet Tab, Cell L756
- (3) Company's Response to Staff 1-16 Attachment 3, 07-21 Hourly Purch Alloc Worksheet Tab, Cell F750
- (4) Company's Response to Staff 1-16 Attachment 3, 07-21 Hourly Purch Alloc Worksheet Tab, Cell G750
- (5) Company's Response to Staff 1-16 Attachment 3, 07-21 Hourly Purch Alloc Worksheet Tab, Cell G754
- (6) Company's Response to Staff 1-16 Attachment 3, 07-21 Hourly Purch Alloc Worksheet Tab, Average of Cell Column L
- (7) Company's Response to Staff 1-16 Attachment 3, 07-21 Hourly Purch Alloc Worksheet Tab, Cell T750, Matches FAC Final Fuel Cost Schedule for July 2021 Actual Results Filed with August 2021 Estimated Fuel Costs page 5 of 5
- (8) Company's Response to Staff 1-16 Attachment 3, 07-21 Hourly Purch Alloc Worksheet Tab, Cells M3 through Q3
- (9) Company's Response to Staff 1-16 Attachment 3, 07-21 KPCo Gen Data Worksheet Tab
- (10) Company's Response to Staff 1-16 Attachment 3, 07-21 Hourly Purch Alloc Worksheet Tab, Cell Columns M through Q
- (11) Company's Response to Staff 1-16 Attachment 3, 07-2021 Worksheet Tab, Cell R757, Matches FAC Final Fuel Cost Schedule
- (12) Company's Response to Staff 1-16 Attachment 3, 07-2021 Worksheet Tab, Cell AA757, Matches FAC Final Fuel Cost Schedule
- (13) Company's Response to Staff 1-16 Attachment 3, 07-2021 Worksheet Tab, Cell V757, Matches FAC Final Fuel Cost Schedule
- (14) Company's Response to Staff 1-16 Attachment 3, 07-2021 Worksheet Tab, Cell AB757, Matches FAC Final Fuel Cost Schedule

Kentucky Power Company  
June 2021 Selected Data

Month	Sum of Native Load MWh for All Hours in Month (1)	Hours in Month	Average Hourly Native Load MW	Total Dispatched Generation MWh for All Hours in Month (2)	Sum of Market Purchases (Non-Rockport) Assigned to Native Load MWh (3)	Sum of Market Purchases (Non-Rockport) Assigned to Native Load \$ (4)	Average Cost of Market Purchases (Non-Rockport) Assigned to Native Load \$/MWh (5)	Average Peaking Unit Equivalent \$/MWh (6)	PUE FAC Disallowance \$ (7)
June	450,000	720	625.0	494,026	68,519	\$ 1,978,453	\$ 28.87	\$ 67.09	\$ -

Generating Unit	Dispatched Generation MWh (8)	KPCO Capability MW (9)	Max Generation for Month MWh	Capacity Factor	Average Cost per MWh (10)	Forced Outages MWh (11)	Fuel Costs Assigned During Forced Outages \$ (12)	Purchase Costs Substituted During Forced Outages \$ (13)	Forced Outage Replacement Costs Removed From FAC \$ (14)
Big Sandy 1	63,219	295	212,400	30%	\$ 36.47	3,639	\$ 115,278	\$ 209,441	\$ 94,162
Mitchell 1	154,970	385	277,200	56%	\$ 22.97	1,558	\$ 49,349	\$ 89,658	\$ 40,309
Mitchell 2	145,143	395	284,400	51%	\$ 22.20				
Rockport 1	89,702	198	142,560	63%	\$ 28.60				
Rockport 2	40,992	195	140,400	29%	\$ 30.94				
<b>Total</b>	<b>494,026</b>	<b>1,468</b>	<b>1,056,960</b>	<b>47%</b>		<b>5,197</b>	<b>\$ 164,627</b>	<b>\$ 299,098</b>	<b>\$ 134,471</b>

- (1) Company's Response to Staff 1-16 Attachment 2, 06-2021 Worksheet Tab, Cell N732
- (2) Company's Response to Staff 1-16 Attachment 2, 06-21 Hourly Purch Alloc Worksheet Tab, Cells M3 through Q3 and 06-2021 Worksheet Tab, Cell L732
- (3) Company's Response to Staff 1-16 Attachment 2, 06-21 Hourly Purch Alloc Worksheet Tab, Cell F726
- (4) Company's Response to Staff 1-16 Attachment 2, 06-21 Hourly Purch Alloc Worksheet Tab, Cell G726
- (5) Company's Response to Staff 1-16 Attachment 2, 06-21 Hourly Purch Alloc Worksheet Tab, Cell G730
- (6) Company's Response to Staff 1-16 Attachment 2, 06-21 Hourly Purch Alloc Worksheet Tab, Average of Cell Column L
- (7) Company's Response to Staff 1-16 Attachment 2, 06-21 Hourly Purch Alloc Worksheet Tab, Cell T726, Matches FAC Final Fuel Cost Schedule for June 2021 Actual Results Filed with July 2021 Estimated Fuel Costs page 5 of 5
- (8) Company's Response to Staff 1-16 Attachment 2, 06-21 Hourly Purch Alloc Worksheet Tab, Cells M3 through Q3
- (9) Company's Response to Staff 1-16 Attachment 2, 06-21 KPCo Gen Data Worksheet Tab
- (10) Company's Response to Staff 1-16 Attachment 2, 06-21 Hourly Purch Alloc Worksheet Tab, Cell Columns M through Q
- (11) Company's Response to Staff 1-16 Attachment 2, 06-2021 Worksheet Tab, Cell R733 and T733, Matches FAC Final Fuel Cost Schedule
- (12) Company's Response to Staff 1-16 Attachment 2, 06-2021 Worksheet Tab, Cell AA733, Matches FAC Final Fuel Cost Schedule
- (13) Company's Response to Staff 1-16 Attachment 2, 06-2021 Worksheet Tab, Cell V733, Matches FAC Final Fuel Cost Schedule
- (14) Company's Response to Staff 1-16 Attachment 2, 06-2021 Worksheet Tab, Cell AB733, Matches FAC Final Fuel Cost Schedule

Kentucky Power Company  
May 2021 Selected Data

Month	Sum of Native Load MWh for All Hours in Month (1)	Hours in Month	Average Hourly Native Load MW	Total Dispatched Generation MWh for All Hours in Month (2)	Sum of Market Purchases (Non-Rockport) Assigned to Native Load MWh (3)	Sum of Market Purchases (Non-Rockport) Assigned to Native Load \$ (4)	Average Cost of Market Purchases (Non-Rockport) Assigned to Native Load \$/MWh (5)	Average Peaking Unit Equivalent \$/MWh (6)	PUE FAC Disallowance \$ (7)
May	409,222	744	550.0	299,498	118,767	\$ 2,920,374	\$ 24.59	\$ 63.37	\$ 27,541

Generating Unit	Dispatched Generation MWh (8)	KPCO Capability MW (9)	Max Generation for Month MWh	Capacity Factor	Average Cost per MWh (10)	Forced Outages MWh (11)	Fuel Costs Assigned During Forced Outages \$ (12)	Purchase Costs Substituted During Forced Outages \$ (13)	Forced Outage Replacement Costs Removed From FAC \$ (14)
Big Sandy 1	38,078	295	219,480	17%	\$ 39.47				
Mitchell 1	0	385	286,440	0%	\$ -	8,913	\$ 180,880	\$ 198,904	\$ 18,024
Mitchell 2	191,146	395	293,880	65%	\$ 21.21				
Rockport 1	70,274	198	147,312	48%	\$ 29.30				
Rockport 2	0	195	145,080	0%	\$ -				
<b>Total</b>	<b>299,498</b>	<b>1,468</b>	<b>1,092,192</b>	<b>27%</b>		<b>8,913</b>	<b>\$ 180,880</b>	<b>\$ 198,904</b>	<b>\$ 18,024</b>

(1) Company's Response to Staff 1-16 Attachment 1, 05-2021 Worksheet Tab, Cell N758

(2) Company's Response to Staff 1-16 Attachment 1, 05-21 Hourly Purch Alloc Worksheet Tab, Cells M3 through Q3 and 05-2021 Worksheet Tab, Cell L758

(3) Company's Response to Staff 1-16 Attachment 1, 05-21 Hourly Purch Alloc Worksheet Tab, Cell F750

(4) Company's Response to Staff 1-16 Attachment 1, 05-21 Hourly Purch Alloc Worksheet Tab, Cell G750

(5) Company's Response to Staff 1-16 Attachment 1, 05-21 Hourly Purch Alloc Worksheet Tab, Cell G754

(6) Company's Response to Staff 1-16 Attachment 1, 05-21 Hourly Purch Alloc Worksheet Tab, Average of Cell Column L

(7) Company's Response to Staff 1-16 Attachment 1, 05-21 Hourly Purch Alloc Worksheet Tab, Cell T750, Matches FAC Final Fuel Cost Schedule for May 2021 Actual Results Filed with June 2021 Estimated Fuel Costs page 5 of 5

(8) Company's Response to Staff 1-16 Attachment 1, 05-21 Hourly Purch Alloc Worksheet Tab, Cells M3 through Q3

(9) Company's Response to Staff 1-16 Attachment 1, 05-21 KPCo Gen Data Worksheet Tab

(10) Company's Response to Staff 1-16 Attachment 1, 05-21 Hourly Purch Alloc Worksheet Tab, Cell Columns M through Q

(11) Company's Response to Staff 1-16 Attachment 1, 05-2021 Worksheet Tab, Cell R759, Matches FAC Final Fuel Cost Schedule

(12) Company's Response to Staff 1-16 Attachment 1, 05-2021 Worksheet Tab, Cell AA759, Matches FAC Final Fuel Cost Schedule

(13) Company's Response to Staff 1-16 Attachment 1, 05-2021 Worksheet Tab, Cell V759, Matches FAC Final Fuel Cost Schedule

(14) Company's Response to Staff 1-16 Attachment 1, 05-2021 Worksheet Tab, Cell AB759, Matches FAC Final Fuel Cost Schedule

Kentucky Power Company  
 Fuel Adjustment Case No. 2022-00036  
 Generating Unit Outages  
 May 1, 2021-October 31, 2021

Unit Name	Event Type *	Event Start	Event End	Event Description
Big Sandy 1	PO	4/10/21 1:50 AM	5/8/21 7:00 AM	Planned Outage to replace #1315667
Big Sandy 1	MO	5/28/21 12:00 PM	6/2/21 2:34 PM	to repair steam leak under HP Turbine and to inspect East Air Heater Bull Gear
Big Sandy 1	MO	6/22/21 6:00 AM	6/28/21 12:00 AM	Boiler and governor valve inspection
Big Sandy 1	FO	6/28/21 12:00 AM	7/1/21 12:00 AM	Water wall tube leak repair
Big Sandy 1	MO	7/1/21 12:00 AM	7/4/21 9:13 PM	to repair and replace Waterwall tubes on rear wall. X-rays show indications that will require replacement. Scaffold is already in place for current repairs. Replace gasket on Reheat isolation device.
Big Sandy 1	MO	7/31/21 12:00 AM	8/7/21 7:00 AM	Boiler i/r
Big Sandy 1	MO	8/14/21 12:40 AM	8/21/21 6:51 AM	Boiler i/r, clean the Main and Auxiliary Condensers and service the East and West Air Compressors.
Big Sandy 1	MO	8/29/21 12:00 AM	9/4/21 7:00 AM	to repair steam leak on lower left Reheat Line
Big Sandy 1	MO	9/23/21 1:45 AM	10/8/21 10:00 PM	Boiler i/r, repair steam leak between RV-309 and the Lower Right RH steam line, repair #5 North HP Heater leak.
Big Sandy 1	PO	10/8/21 10:00 PM	12/21/21 7:47 AM	GBIR, GBIR, Turbine Exhaust High Energy Piping (HEP) inspections, Boiler corrosion fatigue inspections, Main and Aux Condenser eddy current testing, and Cooling Tower repairs.
Mitchell 1	FO	4/9/21 8:29 PM	6/5/21 3:00 PM	Main transformer outage
Mitchell 1	FO	6/5/21 3:00 PM	6/6/21 7:32 PM	Leak on East H2 seal oil cooler
Mitchell 1	MO	7/16/21 2:14 AM	7/23/21 11:01 PM	Repair 11 ID Fan Pitch Blade Operator, install 11A Circulating Water Pump, Boiler i/r.
Mitchell 1	FO	8/3/21 9:40 PM	8/8/21 9:28 PM	Tube Leak
Mitchell 1	FO	8/23/21 6:18 PM	9/1/21 7:58 PM	Tube Leak
Mitchell 1	FO	9/16/21 2:35 AM	9/21/21 12:00 AM	Tube Leak
Mitchell 1	FO	9/21/21 10:46 AM	9/23/21 8:44 AM	Steam leak.
Mitchell 1	FO	9/27/21 4:55 PM	10/2/21 9:30 AM	Loss of Air Heater
Mitchell 1	FO	10/5/21 10:37 PM	10/6/21 6:50 PM	Under Excitation trip
Mitchell 1	MO	10/8/21 12:00 AM	10/8/21 1:46 AM	Boiler i/r; FGD repairs; ID Fan Pilot Valve inspections.
Mitchell 1	MO	10/8/21 1:46 AM	10/8/21 8:17 AM	Boiler i/r; FGD repairs; ID Fan Pilot Valve inspections.
Mitchell 1	MO	10/8/21 8:17 AM	10/8/21 8:27 AM	Boiler i/r; FGD repairs; ID Fan Pilot Valve inspections.
Mitchell 1	MO	10/8/21 8:27 AM	10/8/21 8:28 AM	Boiler i/r; FGD repairs; ID Fan Pilot Valve inspections.
Mitchell 1	MO	10/8/21 8:28 AM	10/8/21 8:33 AM	Boiler i/r; FGD repairs; ID Fan Pilot Valve inspections.
Mitchell 1	MO	10/8/21 8:33 AM	10/8/21 8:35 AM	Boiler i/r; FGD repairs; ID Fan Pilot Valve inspections.
Mitchell 1	MO	10/8/21 8:35 AM	10/16/21 12:00 AM	Boiler i/r; FGD repairs; ID Fan Pilot Valve inspections.
Mitchell 1	PO	10/16/21 12:00 AM	12/12/21 1:31 PM	Boiler i/r, BOP repairs, SCR Catalyst #4 layer replacement, Boiler Feed Pump Element replacement.
Mitchell 1	MO	12/19/21 7:00 AM	12/23/21 8:32 AM	to dewater cooling tower and install 11B Circulating Water Pump
Mitchell 2	MO	6/24/21 12:00 AM	6/26/21 12:00 AM	Boiler Hydro, I/R
Mitchell 2	MO	6/26/21 12:00 AM	7/4/21 4:15 AM	to repair Precipitator Inlet Duct and internal inspection, drain FGD Absorber to repair an Agitator Seal and level probe B"
Mitchell 2	MO	9/4/21 1:54 AM	9/13/21 2:29 AM	Repair 22 ID fan pitch blade issuePatch leaks in precipitator duct. Boiler upper fill valve repairBoiler Hydro inspect and repair.
Mitchell 2	MO	10/22/21 12:00 AM	11/6/21 9:54 AM	Boiler i/r, UMO-803 i/r, Dry Fly Ash repairs, FGD repairs, FMO-101 i/r, #1 Control Valve EHC line i/r.

Event Type \*

FO Forced Outage  
 MO Maintenance Outage  
 PO Planned Outage  
 Note: i/r = inspection and repair

Kentucky Power Company  
 Fuel Adjustment Case No. 2022-00036  
 Generating Unit Outages  
 May 1, 2021-October 31, 2021

Unit Name	Event Type *	Event Start	Event End	Event Description
Rockport 1	MO	7/18/21 2:50 AM	7/19/21 11:34 AM	Repair Boiler Ash Hopper door
Rockport 1	MO	7/30/21 3:14 AM	8/5/21 11:21 PM	Boiler i/r
Rockport 1	FO	8/19/21 5:30 AM	8/20/21 2:13 PM	11C Auxiliary Transformer Overall Differential Trip
Rockport 1	MO	8/21/21 12:00 AM	8/25/21 11:20 AM	Repair Ash Hopper Door #223, Boiler i/r, Boiler Duct Ash removal, Clean Circ. Water Pump Screens
Rockport 1	MO	8/30/21 5:52 AM	9/11/21 12:00 AM	Boiler i/r and duct ash removal; 13.8 Kv Transformer 11C i/r; Pulverizer repairs
Rockport 1	PO	9/11/21 12:00 AM	12/15/21 2:00 PM	General Boiler i/r
Rockport 2	MO	4/15/21 11:00 PM	6/1/21 4:00 PM	DSI Injection System piping upgrade, BOP i/r.
Rockport 2	MO	6/15/21 1:51 PM	6/23/21 7:21 PM	Boiler i/r, Ash Removal, Hydro & RSH/SSH Air Test and to install SCR Heaters.
Rockport 2	MO	9/7/21 4:41 AM	10/9/21 12:00 AM	Boiler I/R, boiler duct ash removal, deslag boiler, generator stator tank hydrogen leak repair, #10 pulverizer tempering air and fuel output damper repair, #4 clinker grinder repair, economizer ash hopper repairs.
Rockport 2	PO	10/9/21 12:00 AM	11/30/21 2:50 PM	General Boiler i/r

Event Type \*

FO Forced Outage  
 MO Maintenance Outage  
 PO Planned Outage  
 Note: i/r = inspection and repair

PLANT	EVENT START	EVENT END	HOURS OFFLINE FOR FORCED, PLANNED, AND MAINTENANCE OUTAGES								
			MAY	JUNE	JULY	AUGUST	SEPTEMBER	OCTOBER			
<b>Big Sandy 1</b>	04/10/2021 1:50 A.M.	5/8/2021 7:00:00 A.M.	175								
	5/28/2021 12:00:00 P.M.	06/02/2021 2:34 P.M.	84	38.5							
	06/22/2021 6:00 A.M.	06/28/2021 12:00 A.M.		138							
	07/01/2021 12:00 A.M.	07/04/2021 9:13 P.M.			93.25						
	07/31/2021 12:00 A.M.	8/7/2021 7:00 A.M.			24	151					
	8/14/2021 12:40 A.M.	08/21/2021 6:51 A.M.				174.25					
	08/29/2021 12:00 A.M.	09/04/2021 7:00 A.M.				72	79				
	09/23/2021 1:45 A.M.	10/08/2021 10:00 P.M.					190	190			
	10/08/2021 10:00 P.M.	12/21/2021 7:47 A.M.							554		
	<b>TOTAL</b>			<b>259</b>	<b>176.5</b>	<b>117.25</b>	<b>397.25</b>	<b>269</b>	<b>744</b>		
	<b>Mitchell 1</b>	04/09/2021 8:29 P.M.	06/05/2021 3:00 P.M.	744	111						
06/05/2021 3:00 P.M.		06/06/2021 7:32 P.M.		28.5							
07/16/2021 2:14 A.M.		07/23/2021 11:01 P.M.			188.75						
8/3/2021 9:40 P.M.		08/08/2021 9:28 P.M.				120					
08/23/2021 6:18 P.M.		09/01/2021 7:58 P.M.				197.75	20				
09/16/2021 2:35 A.M.		09/21/2021 12:00 A.M.					117.25				
09/21/2021 10:46 A.M.		09/23/2021 8:44 A.M.					46				
09/27/2021 4:55 P.M.		10/02/2021 9:30 A.M.					79		33.5		
10/05/2021 10:37 P.M.		10/06/2021 6:50 P.M.							20.25		
10/08/2021 12:00 A.M.		10/08/2021 1:46 A.M.							1.75		
10/08/2021 1:46 A.M.		10/08/2021 8:17 A.M.							6.5		
10/08/2021 8:17 A.M.		10/08/2021 8:27 A.M.							0.1		
10/08/2021 8:27 A.M.		10/08/2021 8:28 A.M.							0.01		
10/08/2021 8:28 A.M.		10/08/2021 8:33 A.M.							0.05		
10/08/2021 8:33 A.M.		10/08/2021 8:35 A.M.							0.02		
10/08/2021 8:35 A.M.		10/16/2021 12:00 A.M.							183.25		
10/16/2021 12:00 A.M.		12/12/2021 1:31 P.M.							384		
<b>TOTAL</b>			<b>744</b>	<b>139.5</b>	<b>188.75</b>	<b>317.75</b>	<b>262.25</b>	<b>629.43</b>			
<b>Mitchell 2</b>	06/24/2021 12:00 A.M.	06/26/2021 12:00 A.M.		48							
	06/26/2021 12:00 A.M.	7/4/2021 4:15 A.M.		120	76.25						
	09/04/2021 1:54 A.M.	09/13/2021 2:29 A.M.						216.5			
	10/22/2021 12:00 A.M.	11/06/2021 9:54 A.M.							240		
<b>TOTAL</b>			<b>168</b>	<b>76.25</b>			<b>216.5</b>	<b>240</b>			
<b>Rockport 1</b>	07/18/2021 2:50 A.M.	07/19/2021 11:34 A.M.			32.75						
	07/30/2021 3:14 A.M.	08/05/2021 11:21 P.M.			44.75	119.25					
	08/19/2021 5:30 A.M.	08/20/2021 2:13 P.M.				32.75					
	08/21/2021 12:00 A.M.	08/25/2021 11:20 A.M.				107.25					
	08/30/2021 5:52 A.M.	09/11/2021 12:00 A.M.				42	240				
	09/11/2021 12:00 A.M.	12/15/2021 2:00 P.M.					480	744			
<b>TOTAL</b>				<b>77.5</b>	<b>301.25</b>	<b>720</b>	<b>744</b>				
<b>Rockport 2</b>	04/15/2021 11:00 P.M.	06/01/2021 4:00 P.M.	744	16							
	06/15/2021 1:51 P.M.	06/23/2021 7:21 P.M.		197.5							
	09/07/2021 4:41 A.M.	10/09/2021 12:00 A.M.					571.25	192			
	10/09/2021 12:00 A.M.	11/30/2021 2:50 P.M.						552			
<b>TOTAL</b>			<b>744</b>	<b>213.5</b>			<b>571.25</b>	<b>744</b>			

Source: Response to Staff 1-15 and KIUC 2-5

**Kentucky Power Company**  
**Availability and Generation by Unit Factoring In All Known Outages**  
**October 2021**

	<u>Capability MW</u>	<u>October 2021</u>
<b>Hours in Month</b>		744
<b>Average Cost of Purchases Assigned to Native Load (\$/MWh)</b>		\$57.37
<b>Purchases Assigned to Native Load (MWh)</b>		225,252
<b>Generation Costs (\$/MWh)</b>		
Big Sandy 1		-
Mitchell 1		\$30.01
Mitchell 2		\$20.74
Rockport 1		-
Rockport 2		-
<b>Hours Offline For Outages</b>		
Big Sandy 1		744
Mitchell 1		629.43
Mitchell 2		240
Rockport 1		744
Rockport 2		744
<b>Hours Available for Generation</b>		
Big Sandy 1		0
Mitchell 1		114.57
Mitchell 2		504
Rockport 1		0
Rockport 2		0
<b>Maximum Generation for Available Hours (MWh)</b>		
Big Sandy 1	295	-
Mitchell 1	385	44,109
Mitchell 2	395	199,080
Rockport 1	198	-
Rockport 2	195	-
<b>Actual Generation (MWh)</b>		
Big Sandy 1		-
Mitchell 1		27,613
Mitchell 2		133,877
Rockport 1		-
Rockport 2		-
<b>Net Output Factor (Generation During Available Hours)</b>		
Big Sandy 1		-
Mitchell 1		63%
Mitchell 2		67%
Rockport 1		-
Rockport 2		-

Source Data: Attachments included in Response to Staff 1-15, Staff 1-16 and KIUC 2-5.

### ISO Day-Ahead Prices (Data)

Region: PJM

As Of: 10/01/2021

Frequency: Hourly

Peak: Around the clock

<i>Date</i>	<i>AEP GEN HUB</i>	<i>AEP-DAYTON HUB</i>
10/01/2021 23:00	38.00	38.87
10/01/2021 22:00	43.25	44.38
10/01/2021 21:00	46.85	48.08
10/01/2021 20:00	53.66	55.02
10/01/2021 19:00	61.45	64.73
10/01/2021 18:00	63.83	68.81
10/01/2021 17:00	71.79	77.22
10/01/2021 16:00	67.09	72.45
10/01/2021 15:00	63.43	68.06
10/01/2021 14:00	60.91	63.94
10/01/2021 13:00	56.91	59.15
10/01/2021 12:00	57.67	59.31
10/01/2021 11:00	51.30	52.76
10/01/2021 10:00	48.17	49.54
10/01/2021 09:00	48.46	49.79
10/01/2021 08:00	48.05	49.38
10/01/2021 07:00	49.78	51.05
10/01/2021 06:00	45.67	46.79
10/01/2021 05:00	35.41	36.22
10/01/2021 04:00	33.65	34.33
10/01/2021 03:00	33.22	33.87
10/01/2021 02:00	33.39	34.06
10/01/2021 01:00	34.24	34.98
10/01/2021 00:00	36.47	37.25

Hourly data is displayed in prevailing time, which includes an annual daylight savings adjustment, as follows: ISO-NE, NYISO, PJM, MISO, Ontario use Eastern Time; ERCOT and SPP use Central Time; Alberta uses Mountain Time. To view more than one day or to adjust displayed time zone, click into Advanced Charting or export data to the Excel Add-In and adjust the time zone setting. Daily, monthly, and annual peak prices assume the following definitions: Peak hours include IESO, NYISO, ISO-NE, PJM hour beginning (HB) 7 – 22, M - F, ET (prevailing); MISO HB 6 – 21, M - F, year round EST; ERCOT, SPP HB 6 – 21, M - F, CT (prevailing); CAISO HB 6 – 21, M - Sat, PT (prevailing); AESO HB 7 – 22, M - Sun, MT (prevailing). All other hours are considered off-peak. The NERC holiday calendar is followed. See Help documentation for further details.

**ISO Day-Ahead Prices (Data)**

Region: PJM

As Of: 10/02/2021

Frequency: Hourly

Peak: Around the clock

<b>Date</b>	<b>AEP GEN HUB</b>	<b>AEP-DAYTON HUB</b>
10/02/2021 23:00	40.29	41.14
10/02/2021 22:00	45.38	46.44
10/02/2021 21:00	51.10	52.25
10/02/2021 20:00	58.80	60.16
10/02/2021 19:00	65.48	67.10
10/02/2021 18:00	68.18	69.97
10/02/2021 17:00	75.08	77.22
10/02/2021 16:00	67.45	69.36
10/02/2021 15:00	63.66	65.40
10/02/2021 14:00	60.73	62.35
10/02/2021 13:00	56.12	57.55
10/02/2021 12:00	50.05	51.37
10/02/2021 11:00	45.47	46.68
10/02/2021 10:00	43.74	44.93
10/02/2021 09:00	44.98	46.08
10/02/2021 08:00	41.57	42.52
10/02/2021 07:00	41.35	42.29
10/02/2021 06:00	36.91	37.72
10/02/2021 05:00	35.74	36.47
10/02/2021 04:00	34.62	35.25
10/02/2021 03:00	34.41	35.03
10/02/2021 02:00	35.80	36.42
10/02/2021 01:00	37.69	38.34
10/02/2021 00:00	41.17	41.94

**ISO Day-Ahead Prices (Data)**

Region: PJM

As Of: 10/03/2021

Frequency: Hourly

Peak: Around the clock

<i>Date</i>	<i>AEP GEN HUB</i>	<i>AEP-DAYTON HUB</i>
10/03/2021 23:00	43.23	44.13
10/03/2021 22:00	51.01	52.01
10/03/2021 21:00	58.32	59.55
10/03/2021 20:00	68.38	69.81
10/03/2021 19:00	79.20	80.90
10/03/2021 18:00	78.32	79.96
10/03/2021 17:00	79.82	81.36
10/03/2021 16:00	74.04	75.65
10/03/2021 15:00	71.86	73.56
10/03/2021 14:00	66.22	67.77
10/03/2021 13:00	62.74	64.11
10/03/2021 12:00	55.15	56.30
10/03/2021 11:00	49.27	50.27
10/03/2021 10:00	44.91	45.77
10/03/2021 09:00	41.43	42.12
10/03/2021 08:00	39.48	40.16
10/03/2021 07:00	38.55	39.17
10/03/2021 06:00	34.09	34.64
10/03/2021 05:00	33.09	33.58
10/03/2021 04:00	32.37	32.84
10/03/2021 03:00	32.68	33.16
10/03/2021 02:00	34.97	35.50
10/03/2021 01:00	37.63	38.25
10/03/2021 00:00	40.64	41.36

### ISO Day-Ahead Prices (Data)

Region: PJM

As Of: 10/04/2021

Frequency: Hourly

Peak: Around the clock

<i>Date</i>	<i>AEP GEN HUB</i>	<i>AEP-DAYTON HUB</i>
10/04/2021 23:00	48.70	49.64
10/04/2021 22:00	57.94	59.08
10/04/2021 21:00	68.48	69.84
10/04/2021 20:00	73.02	74.34
10/04/2021 19:00	88.70	90.88
10/04/2021 18:00	85.88	91.23
10/04/2021 17:00	94.15	98.64
10/04/2021 16:00	87.94	92.71
10/04/2021 15:00	83.80	87.31
10/04/2021 14:00	83.95	85.53
10/04/2021 13:00	82.30	83.84
10/04/2021 12:00	75.90	77.44
10/04/2021 11:00	78.61	80.22
10/04/2021 10:00	72.38	73.85
10/04/2021 09:00	69.84	71.20
10/04/2021 08:00	65.37	66.67
10/04/2021 07:00	68.38	69.79
10/04/2021 06:00	58.38	59.52
10/04/2021 05:00	43.16	43.97
10/04/2021 04:00	37.45	38.13
10/04/2021 03:00	34.95	35.60
10/04/2021 02:00	35.84	36.55
10/04/2021 01:00	40.19	41.00
10/04/2021 00:00	42.81	43.65

**ISO Day-Ahead Prices (Data)**

Region: PJM  
 As Of: 10/05/2021  
 Frequency: Hourly  
 Peak: Around the clock

<i>Date</i>	<i>AEP GEN HUB</i>	<i>AEP-DAYTON HUB</i>
10/05/2021 23:00	52.62	53.47
10/05/2021 22:00	58.41	59.52
10/05/2021 21:00	67.05	68.33
10/05/2021 20:00	75.00	76.17
10/05/2021 19:00	84.95	86.61
10/05/2021 18:00	87.60	89.29
10/05/2021 17:00	93.83	95.52
10/05/2021 16:00	89.14	90.89
10/05/2021 15:00	84.80	86.57
10/05/2021 14:00	82.87	84.67
10/05/2021 13:00	77.23	78.74
10/05/2021 12:00	71.77	73.19
10/05/2021 11:00	69.97	71.37
10/05/2021 10:00	67.93	69.32
10/05/2021 09:00	64.63	66.05
10/05/2021 08:00	61.19	62.61
10/05/2021 07:00	60.91	62.10
10/05/2021 06:00	62.43	64.11
10/05/2021 05:00	53.80	54.79
10/05/2021 04:00	43.81	44.63
10/05/2021 03:00	42.21	43.01
10/05/2021 02:00	44.02	44.87
10/05/2021 01:00	49.11	50.02
10/05/2021 00:00	50.58	51.48

**ISO Day-Ahead Prices (Data)**

Region: PJM

As Of: 10/06/2021

Frequency: Hourly

Peak: Around the clock

<b>Date</b>	<b>AEP GEN HUB</b>	<b>AEP-DAYTON HUB</b>
10/06/2021 23:00	54.34	55.27
10/06/2021 22:00	57.83	60.22
10/06/2021 21:00	67.43	69.81
10/06/2021 20:00	74.25	80.18
10/06/2021 19:00	91.17	92.64
10/06/2021 18:00	85.49	86.84
10/06/2021 17:00	92.79	94.05
10/06/2021 16:00	90.37	91.92
10/06/2021 15:00	81.76	83.72
10/06/2021 14:00	76.40	78.55
10/06/2021 13:00	75.22	77.04
10/06/2021 12:00	72.42	73.89
10/06/2021 11:00	67.30	69.00
10/06/2021 10:00	65.49	66.94
10/06/2021 09:00	62.94	67.87
10/06/2021 08:00	58.73	61.60
10/06/2021 07:00	60.40	63.60
10/06/2021 06:00	60.55	64.27
10/06/2021 05:00	46.97	50.08
10/06/2021 04:00	39.86	43.36
10/06/2021 03:00	38.55	42.10
10/06/2021 02:00	39.63	42.53
10/06/2021 01:00	44.53	47.40
10/06/2021 00:00	47.59	49.32

### ISO Day-Ahead Prices (Data)

Region: PJM  
As Of: 10/07/2021  
Frequency: Hourly  
Peak: Around the clock

<b>Date</b>	<b>AEP GEN HUB</b>	<b>AEP-DAYTON HUB</b>
10/07/2021 23:00	54.86	56.37
10/07/2021 22:00	58.62	60.34
10/07/2021 21:00	68.26	70.30
10/07/2021 20:00	72.80	76.52
10/07/2021 19:00	86.74	91.80
10/07/2021 18:00	79.94	84.97
10/07/2021 17:00	90.67	94.69
10/07/2021 16:00	89.89	92.75
10/07/2021 15:00	82.03	85.09
10/07/2021 14:00	81.40	85.00
10/07/2021 13:00	82.30	85.08
10/07/2021 12:00	78.59	80.92
10/07/2021 11:00	74.57	76.06
10/07/2021 10:00	72.45	74.07
10/07/2021 09:00	70.15	71.83
10/07/2021 08:00	64.99	66.46
10/07/2021 07:00	68.60	70.18
10/07/2021 06:00	67.96	72.16
10/07/2021 05:00	52.63	55.58
10/07/2021 04:00	43.61	45.69
10/07/2021 03:00	41.25	43.31
10/07/2021 02:00	42.66	44.61
10/07/2021 01:00	46.94	48.98
10/07/2021 00:00	51.75	53.92

### ISO Day-Ahead Prices (Data)

Region: PJM

As Of: 10/08/2021

Frequency: Hourly

Peak: Around the clock

<i>Date</i>	<i>AEP GEN HUB</i>	<i>AEP-DAYTON HUB</i>
10/08/2021 23:00	51.96	53.29
10/08/2021 22:00	57.33	58.85
10/08/2021 21:00	62.19	63.74
10/08/2021 20:00	68.46	69.99
10/08/2021 19:00	74.59	76.28
10/08/2021 18:00	75.27	77.04
10/08/2021 17:00	84.04	85.71
10/08/2021 16:00	78.00	79.62
10/08/2021 15:00	76.53	78.27
10/08/2021 14:00	72.77	74.44
10/08/2021 13:00	70.87	72.72
10/08/2021 12:00	72.01	73.93
10/08/2021 11:00	68.46	70.30
10/08/2021 10:00	68.28	70.27
10/08/2021 09:00	67.28	68.89
10/08/2021 08:00	62.70	64.28
10/08/2021 07:00	67.80	69.43
10/08/2021 06:00	58.35	59.77
10/08/2021 05:00	48.69	49.75
10/08/2021 04:00	40.74	41.61
10/08/2021 03:00	39.09	39.91
10/08/2021 02:00	40.96	41.82
10/08/2021 01:00	43.89	44.87
10/08/2021 00:00	46.48	47.49

# S&P Capital IQ

## ISO Day-Ahead Prices (Data)

Region: PJM

As Of: 10/09/2021

Frequency: Hourly

Peak: Around the clock

<i>Date</i>	<i>AEP GEN HUB</i>	<i>AEP-DAYTON HUB</i>
10/09/2021 23:00	40.77	41.34
10/09/2021 22:00	46.67	47.49
10/09/2021 21:00	51.39	52.43
10/09/2021 20:00	63.03	64.23
10/09/2021 19:00	69.89	71.22
10/09/2021 18:00	68.14	69.47
10/09/2021 17:00	70.14	71.81
10/09/2021 16:00	67.09	68.57
10/09/2021 15:00	62.21	64.18
10/09/2021 14:00	61.97	63.43
10/09/2021 13:00	60.66	62.40
10/09/2021 12:00	61.69	63.44
10/09/2021 11:00	61.72	63.45
10/09/2021 10:00	56.44	58.01
10/09/2021 09:00	55.95	57.56
10/09/2021 08:00	49.64	51.06
10/09/2021 07:00	47.19	48.50
10/09/2021 06:00	43.06	44.20
10/09/2021 05:00	40.27	41.18
10/09/2021 04:00	39.50	40.39
10/09/2021 03:00	39.21	40.10
10/09/2021 02:00	41.75	42.70
10/09/2021 01:00	47.56	48.69
10/09/2021 00:00	49.41	50.54

**ISO Day-Ahead Prices (Data)**

Region: PJM

As Of: 10/10/2021

Frequency: Hourly

Peak: Around the clock

<i>Date</i>	<i>AEP GEN HUB</i>	<i>AEP-DAYTON HUB</i>
10/10/2021 23:00	43.50	43.96
10/10/2021 22:00	49.37	49.81
10/10/2021 21:00	61.18	61.69
10/10/2021 20:00	73.74	74.33
10/10/2021 19:00	81.86	82.95
10/10/2021 18:00	84.36	85.45
10/10/2021 17:00	81.42	82.69
10/10/2021 16:00	76.27	77.57
10/10/2021 15:00	76.26	77.37
10/10/2021 14:00	70.31	71.28
10/10/2021 13:00	63.82	64.89
10/10/2021 12:00	60.58	61.43
10/10/2021 11:00	57.42	58.21
10/10/2021 10:00	51.30	52.05
10/10/2021 09:00	45.94	46.47
10/10/2021 08:00	39.83	40.17
10/10/2021 07:00	38.84	38.76
10/10/2021 06:00	35.86	35.64
10/10/2021 05:00	33.22	32.94
10/10/2021 04:00	33.44	33.45
10/10/2021 03:00	33.54	33.54
10/10/2021 02:00	35.70	35.83
10/10/2021 01:00	36.89	37.01
10/10/2021 00:00	39.99	40.21

**ISO Day-Ahead Prices (Data)**

Region: PJM  
 As Of: 10/11/2021  
 Frequency: Hourly  
 Peak: Around the clock

<i>Date</i>	<i>AEP GEN HUB</i>	<i>AEP-DAYTON HUB</i>
10/11/2021 23:00	43.20	42.92
10/11/2021 22:00	51.08	49.96
10/11/2021 21:00	60.93	59.77
10/11/2021 20:00	74.78	73.04
10/11/2021 19:00	82.90	81.71
10/11/2021 18:00	84.80	84.11
10/11/2021 17:00	88.73	88.08
10/11/2021 16:00	85.08	84.81
10/11/2021 15:00	79.57	79.34
10/11/2021 14:00	72.76	72.10
10/11/2021 13:00	69.04	68.48
10/11/2021 12:00	64.63	64.55
10/11/2021 11:00	62.13	62.49
10/11/2021 10:00	57.61	57.93
10/11/2021 09:00	52.65	53.08
10/11/2021 08:00	51.92	52.41
10/11/2021 07:00	50.48	51.06
10/11/2021 06:00	46.27	46.88
10/11/2021 05:00	38.15	38.65
10/11/2021 04:00	34.08	34.54
10/11/2021 03:00	32.12	32.55
10/11/2021 02:00	32.37	32.84
10/11/2021 01:00	34.57	35.08
10/11/2021 00:00	36.96	37.50

**ISO Day-Ahead Prices (Data)**

Region: PJM

As Of: 10/12/2021

Frequency: Hourly

Peak: Around the clock

<i>Date</i>	<i>AEP GEN HUB</i>	<i>AEP-DAYTON HUB</i>
10/12/2021 23:00	44.19	44.90
10/12/2021 22:00	50.88	51.61
10/12/2021 21:00	62.97	63.64
10/12/2021 20:00	74.28	75.32
10/12/2021 19:00	89.43	90.67
10/12/2021 18:00	85.57	86.90
10/12/2021 17:00	81.35	82.13
10/12/2021 16:00	76.85	77.38
10/12/2021 15:00	73.37	73.86
10/12/2021 14:00	73.88	74.35
10/12/2021 13:00	68.05	68.07
10/12/2021 12:00	67.86	67.71
10/12/2021 11:00	66.07	66.03
10/12/2021 10:00	66.56	66.89
10/12/2021 09:00	55.79	56.06
10/12/2021 08:00	52.39	52.74
10/12/2021 07:00	52.99	52.87
10/12/2021 06:00	52.13	51.67
10/12/2021 05:00	40.57	40.20
10/12/2021 04:00	35.29	34.92
10/12/2021 03:00	33.16	32.40
10/12/2021 02:00	33.90	33.12
10/12/2021 01:00	36.08	35.14
10/12/2021 00:00	37.09	35.79

# S&P Capital IQ

## ISO Day-Ahead Prices (Data)

Region: PJM

As Of: 10/13/2021

Frequency: Hourly

Peak: Around the clock

<b>Date</b>	<b>AEP GEN HUB</b>	<b>AEP-DAYTON HUB</b>
10/13/2021 23:00	45.93	45.98
10/13/2021 22:00	51.35	51.67
10/13/2021 21:00	58.81	59.27
10/13/2021 20:00	69.42	69.56
10/13/2021 19:00	81.95	81.78
10/13/2021 18:00	82.80	82.22
10/13/2021 17:00	82.02	81.32
10/13/2021 16:00	76.37	75.58
10/13/2021 15:00	75.06	74.21
10/13/2021 14:00	70.57	70.38
10/13/2021 13:00	68.53	68.59
10/13/2021 12:00	66.86	67.64
10/13/2021 11:00	63.62	64.77
10/13/2021 10:00	60.41	61.60
10/13/2021 09:00	55.67	56.00
10/13/2021 08:00	53.69	54.23
10/13/2021 07:00	57.63	58.52
10/13/2021 06:00	54.42	55.00
10/13/2021 05:00	43.82	44.43
10/13/2021 04:00	39.20	39.70
10/13/2021 03:00	35.65	36.08
10/13/2021 02:00	36.54	36.96
10/13/2021 01:00	42.28	42.82
10/13/2021 00:00	44.11	44.63

**ISO Day-Ahead Prices (Data)**

Region: PJM

As Of: 10/14/2021

Frequency: Hourly

Peak: Around the clock

<i>Date</i>	<i>AEP GEN HUB</i>	<i>AEP-DAYTON HUB</i>
10/14/2021 23:00	50.30	50.88
10/14/2021 22:00	61.46	62.00
10/14/2021 21:00	68.08	68.79
10/14/2021 20:00	75.11	76.00
10/14/2021 19:00	92.59	93.70
10/14/2021 18:00	90.52	91.51
10/14/2021 17:00	94.39	95.35
10/14/2021 16:00	88.09	88.88
10/14/2021 15:00	81.57	83.60
10/14/2021 14:00	78.45	80.22
10/14/2021 13:00	72.92	74.50
10/14/2021 12:00	71.52	72.64
10/14/2021 11:00	66.97	68.11
10/14/2021 10:00	64.57	65.97
10/14/2021 09:00	59.88	61.34
10/14/2021 08:00	58.81	60.00
10/14/2021 07:00	61.36	62.48
10/14/2021 06:00	58.46	59.41
10/14/2021 05:00	45.68	46.29
10/14/2021 04:00	39.16	39.67
10/14/2021 03:00	35.45	35.86
10/14/2021 02:00	35.90	36.34
10/14/2021 01:00	40.61	41.11
10/14/2021 00:00	42.54	43.02

**ISO Day-Ahead Prices (Data)**

Region: PJM  
 As Of: 10/15/2021  
 Frequency: Hourly  
 Peak: Around the clock

<i>Date</i>	<i>AEP GEN HUB</i>	<i>AEP-DAYTON HUB</i>
10/15/2021 23:00	49.19	48.69
10/15/2021 22:00	62.87	60.99
10/15/2021 21:00	67.64	65.72
10/15/2021 20:00	73.53	71.29
10/15/2021 19:00	86.80	84.13
10/15/2021 18:00	88.74	85.41
10/15/2021 17:00	96.80	92.65
10/15/2021 16:00	98.04	93.38
10/15/2021 15:00	90.01	87.05
10/15/2021 14:00	89.41	87.52
10/15/2021 13:00	84.73	83.88
10/15/2021 12:00	76.91	76.74
10/15/2021 11:00	78.33	78.89
10/15/2021 10:00	73.59	74.63
10/15/2021 09:00	71.32	72.77
10/15/2021 08:00	68.18	69.22
10/15/2021 07:00	72.05	73.08
10/15/2021 06:00	61.64	62.79
10/15/2021 05:00	48.32	49.06
10/15/2021 04:00	42.99	43.69
10/15/2021 03:00	39.79	40.41
10/15/2021 02:00	40.75	41.39
10/15/2021 01:00	45.59	46.32
10/15/2021 00:00	50.23	50.99

**ISO Day-Ahead Prices (Data)**

Region: PJM

As Of: 10/16/2021

Frequency: Hourly

Peak: Around the clock

<b>Date</b>	<b>AEP GEN HUB</b>	<b>AEP-DAYTON HUB</b>
10/16/2021 23:00	36.87	37.07
10/16/2021 22:00	38.58	38.60
10/16/2021 21:00	45.33	45.73
10/16/2021 20:00	53.04	53.51
10/16/2021 19:00	58.30	58.29
10/16/2021 18:00	54.77	53.91
10/16/2021 17:00	52.43	50.29
10/16/2021 16:00	50.81	48.55
10/16/2021 15:00	49.86	47.51
10/16/2021 14:00	50.78	47.78
10/16/2021 13:00	51.46	48.38
10/16/2021 12:00	52.12	49.38
10/16/2021 11:00	52.92	51.30
10/16/2021 10:00	54.40	53.30
10/16/2021 09:00	52.47	51.63
10/16/2021 08:00	48.94	48.45
10/16/2021 07:00	47.17	46.83
10/16/2021 06:00	43.83	43.67
10/16/2021 05:00	40.66	40.36
10/16/2021 04:00	38.87	38.68
10/16/2021 03:00	38.73	38.42
10/16/2021 02:00	41.95	41.46
10/16/2021 01:00	46.47	46.07
10/16/2021 00:00	48.70	48.27

**ISO Day-Ahead Prices (Data)**

Region: PJM

As Of: 10/17/2021

Frequency: Hourly

Peak: Around the clock

<i>Date</i>	<i>AEP GEN HUB</i>	<i>AEP-DAYTON HUB</i>
10/17/2021 23:00	38.68	38.54
10/17/2021 22:00	42.81	43.18
10/17/2021 21:00	50.33	50.83
10/17/2021 20:00	56.20	56.91
10/17/2021 19:00	67.41	68.23
10/17/2021 18:00	58.73	59.25
10/17/2021 17:00	47.61	47.90
10/17/2021 16:00	41.57	41.80
10/17/2021 15:00	38.83	39.02
10/17/2021 14:00	38.85	39.02
10/17/2021 13:00	40.02	40.14
10/17/2021 12:00	40.81	40.97
10/17/2021 11:00	41.61	41.88
10/17/2021 10:00	40.62	40.97
10/17/2021 09:00	39.00	39.39
10/17/2021 08:00	38.70	39.08
10/17/2021 07:00	36.75	37.09
10/17/2021 06:00	34.22	34.55
10/17/2021 05:00	33.60	33.37
10/17/2021 04:00	32.41	32.18
10/17/2021 03:00	32.38	32.00
10/17/2021 02:00	33.65	33.16
10/17/2021 01:00	34.76	34.23
10/17/2021 00:00	36.26	35.59

**ISO Day-Ahead Prices (Data)**

Region: PJM  
 As Of: 10/18/2021  
 Frequency: Hourly  
 Peak: Around the clock

<i>Date</i>	<i>AEP GEN HUB</i>	<i>AEP-DAYTON HUB</i>
10/18/2021 23:00	47.99	48.68
10/18/2021 22:00	57.10	57.90
10/18/2021 21:00	63.19	64.19
10/18/2021 20:00	71.87	73.09
10/18/2021 19:00	83.78	85.30
10/18/2021 18:00	78.73	79.97
10/18/2021 17:00	69.91	70.80
10/18/2021 16:00	66.84	67.73
10/18/2021 15:00	61.12	61.92
10/18/2021 14:00	64.55	65.42
10/18/2021 13:00	63.65	64.51
10/18/2021 12:00	67.51	68.40
10/18/2021 11:00	69.77	70.73
10/18/2021 10:00	69.88	70.89
10/18/2021 09:00	73.69	75.36
10/18/2021 08:00	74.53	76.03
10/18/2021 07:00	75.63	77.07
10/18/2021 06:00	77.33	78.30
10/18/2021 05:00	52.25	52.82
10/18/2021 04:00	40.38	40.81
10/18/2021 03:00	36.38	36.77
10/18/2021 02:00	36.06	36.46
10/18/2021 01:00	36.05	36.45
10/18/2021 00:00	36.97	37.38

# S&P Capital IQ

## ISO Day-Ahead Prices (Data)

Region: PJM

As Of: 10/19/2021

Frequency: Hourly

Peak: Around the clock

<i>Date</i>	<i>AEP GEN HUB</i>	<i>AEP-DAYTON HUB</i>
10/19/2021 23:00	41.31	41.53
10/19/2021 22:00	46.02	46.46
10/19/2021 21:00	49.91	50.78
10/19/2021 20:00	62.07	63.37
10/19/2021 19:00	70.82	72.25
10/19/2021 18:00	67.43	68.76
10/19/2021 17:00	62.46	63.66
10/19/2021 16:00	60.10	61.39
10/19/2021 15:00	52.87	54.01
10/19/2021 14:00	54.65	55.87
10/19/2021 13:00	52.51	53.68
10/19/2021 12:00	54.92	56.12
10/19/2021 11:00	58.41	59.74
10/19/2021 10:00	57.02	58.26
10/19/2021 09:00	61.82	63.33
10/19/2021 08:00	64.27	65.86
10/19/2021 07:00	74.31	75.84
10/19/2021 06:00	69.82	71.23
10/19/2021 05:00	45.67	46.53
10/19/2021 04:00	35.74	36.25
10/19/2021 03:00	34.74	35.33
10/19/2021 02:00	34.70	35.17
10/19/2021 01:00	35.41	35.93
10/19/2021 00:00	39.12	39.74

# S&P Capital IQ Logo

## ISO Day-Ahead Prices (Data)

Region: PJM

As Of: 10/20/2021

Frequency: Hourly

Peak: Around the clock

<i>Date</i>	<i>AEP GEN HUB</i>	<i>AEP-DAYTON HUB</i>
10/20/2021 23:00	36.73	36.27
10/20/2021 22:00	41.47	40.95
10/20/2021 21:00	48.81	48.40
10/20/2021 20:00	55.75	55.60
10/20/2021 19:00	70.10	69.84
10/20/2021 18:00	67.43	66.84
10/20/2021 17:00	66.33	65.69
10/20/2021 16:00	58.34	58.44
10/20/2021 15:00	56.04	56.79
10/20/2021 14:00	56.41	57.54
10/20/2021 13:00	56.53	57.63
10/20/2021 12:00	56.00	57.12
10/20/2021 11:00	55.45	56.63
10/20/2021 10:00	54.58	55.73
10/20/2021 09:00	51.38	52.40
10/20/2021 08:00	57.26	58.41
10/20/2021 07:00	65.20	66.57
10/20/2021 06:00	59.75	60.82
10/20/2021 05:00	41.61	42.19
10/20/2021 04:00	33.82	34.26
10/20/2021 03:00	32.73	33.13
10/20/2021 02:00	32.99	33.33
10/20/2021 01:00	34.02	34.45
10/20/2021 00:00	36.99	37.42

# S&P Capital IQ PRO

## ISO Day-Ahead Prices (Data)

Region: PJM

As Of: 10/21/2021

Frequency: Hourly

Peak: Around the clock

Date	AEP GEN HUB	AEP-DAYTON HUB
10/21/2021 23:00	40.66	41.28
10/21/2021 22:00	45.32	45.99
10/21/2021 21:00	53.46	54.39
10/21/2021 20:00	58.90	59.97
10/21/2021 19:00	73.23	74.56
10/21/2021 18:00	67.03	68.03
10/21/2021 17:00	66.48	66.97
10/21/2021 16:00	57.98	58.18
10/21/2021 15:00	55.81	56.09
10/21/2021 14:00	55.41	55.31
10/21/2021 13:00	54.05	54.04
10/21/2021 12:00	53.60	53.49
10/21/2021 11:00	50.79	51.01
10/21/2021 10:00	47.77	47.85
10/21/2021 09:00	47.45	47.23
10/21/2021 08:00	50.04	49.73
10/21/2021 07:00	52.91	52.61
10/21/2021 06:00	47.15	46.85
10/21/2021 05:00	35.92	35.67
10/21/2021 04:00	30.59	30.39
10/21/2021 03:00	29.01	28.82
10/21/2021 02:00	28.95	28.52
10/21/2021 01:00	30.41	29.96
10/21/2021 00:00	31.36	31.02

# S&P Capital IQ

## ISO Day-Ahead Prices (Data)

Region: PJM

As Of: 10/22/2021

Frequency: Hourly

Peak: Around the clock

Date	AEP GEN HUB	AEP-DAYTON HUB
10/22/2021 23:00	51.78	52.68
10/22/2021 22:00	57.74	58.82
10/22/2021 21:00	60.91	62.19
10/22/2021 20:00	63.93	65.23
10/22/2021 19:00	71.98	73.36
10/22/2021 18:00	66.77	67.92
10/22/2021 17:00	68.82	69.89
10/22/2021 16:00	63.13	64.13
10/22/2021 15:00	66.32	67.53
10/22/2021 14:00	62.33	63.42
10/22/2021 13:00	65.44	66.57
10/22/2021 12:00	68.40	69.53
10/22/2021 11:00	70.03	71.19
10/22/2021 10:00	70.75	71.96
10/22/2021 09:00	67.93	69.01
10/22/2021 08:00	67.32	68.40
10/22/2021 07:00	71.74	73.26
10/22/2021 06:00	61.77	62.91
10/22/2021 05:00	47.80	48.56
10/22/2021 04:00	43.78	44.36
10/22/2021 03:00	40.33	40.86
10/22/2021 02:00	40.62	41.13
10/22/2021 01:00	44.02	44.59
10/22/2021 00:00	45.27	45.87

# S&P Capital IQ PRO

## ISO Day-Ahead Prices (Data)

Region: PJM

As Of: 10/23/2021

Frequency: Hourly

Peak: Around the clock

<i>Date</i>	<i>AEP GEN HUB</i>	<i>AEP-DAYTON HUB</i>
10/23/2021 23:00	51.24	52.43
10/23/2021 22:00	57.34	58.63
10/23/2021 21:00	63.55	64.98
10/23/2021 20:00	67.75	69.24
10/23/2021 19:00	77.11	78.85
10/23/2021 18:00	74.73	76.32
10/23/2021 17:00	66.56	67.87
10/23/2021 16:00	55.60	56.70
10/23/2021 15:00	52.40	53.57
10/23/2021 14:00	52.02	53.19
10/23/2021 13:00	54.06	55.31
10/23/2021 12:00	62.71	64.31
10/23/2021 11:00	65.16	66.85
10/23/2021 10:00	66.30	68.06
10/23/2021 09:00	62.97	64.54
10/23/2021 08:00	62.24	63.78
10/23/2021 07:00	61.76	63.18
10/23/2021 06:00	51.38	52.48
10/23/2021 05:00	47.20	48.16
10/23/2021 04:00	43.93	44.75
10/23/2021 03:00	43.47	44.31
10/23/2021 02:00	45.13	45.95
10/23/2021 01:00	48.26	49.10
10/23/2021 00:00	52.11	52.99

**ISO Day-Ahead Prices (Data)**

Region: PJM  
 As Of: 10/24/2021  
 Frequency: Hourly  
 Peak: Around the clock

<i>Date</i>	<i>AEP GEN HUB</i>	<i>AEP-DAYTON HUB</i>
10/24/2021 23:00	42.80	42.36
10/24/2021 22:00	46.26	46.01
10/24/2021 21:00	54.92	55.04
10/24/2021 20:00	65.18	64.96
10/24/2021 19:00	70.79	70.78
10/24/2021 18:00	70.30	69.82
10/24/2021 17:00	67.02	66.70
10/24/2021 16:00	53.65	53.47
10/24/2021 15:00	49.36	49.59
10/24/2021 14:00	48.13	48.50
10/24/2021 13:00	47.41	47.89
10/24/2021 12:00	48.33	49.18
10/24/2021 11:00	48.27	49.27
10/24/2021 10:00	47.82	48.84
10/24/2021 09:00	46.06	47.03
10/24/2021 08:00	45.67	46.70
10/24/2021 07:00	45.00	45.99
10/24/2021 06:00	41.58	42.41
10/24/2021 05:00	40.10	40.85
10/24/2021 04:00	38.29	38.99
10/24/2021 03:00	38.54	39.26
10/24/2021 02:00	41.75	42.53
10/24/2021 01:00	44.46	45.30
10/24/2021 00:00	47.41	48.38

**ISO Day-Ahead Prices (Data)**

Region: PJM  
 As Of: 10/25/2021  
 Frequency: Hourly  
 Peak: Around the clock

<i>Date</i>	<i>AEP GEN HUB</i>	<i>AEP-DAYTON HUB</i>
10/25/2021 23:00	49.52	49.44
10/25/2021 22:00	57.88	57.68
10/25/2021 21:00	63.48	63.44
10/25/2021 20:00	69.07	69.62
10/25/2021 19:00	80.16	80.57
10/25/2021 18:00	85.76	85.06
10/25/2021 17:00	78.60	77.18
10/25/2021 16:00	70.53	69.33
10/25/2021 15:00	70.06	68.14
10/25/2021 14:00	70.20	68.66
10/25/2021 13:00	70.63	68.85
10/25/2021 12:00	75.18	74.28
10/25/2021 11:00	69.47	68.78
10/25/2021 10:00	67.66	67.89
10/25/2021 09:00	68.01	67.91
10/25/2021 08:00	63.60	63.92
10/25/2021 07:00	67.71	67.87
10/25/2021 06:00	64.98	64.70
10/25/2021 05:00	45.38	44.48
10/25/2021 04:00	37.85	37.22
10/25/2021 03:00	35.41	35.12
10/25/2021 02:00	35.44	34.95
10/25/2021 01:00	36.82	36.40
10/25/2021 00:00	39.08	38.72

**ISO Day-Ahead Prices (Data)**

Region: PJM

As Of: 10/26/2021

Frequency: Hourly

Peak: Around the clock

<b>Date</b>	<b>AEP GEN HUB</b>	<b>AEP-DAYTON HUB</b>
10/26/2021 23:00	47.81	48.38
10/26/2021 22:00	53.83	54.50
10/26/2021 21:00	62.76	63.54
10/26/2021 20:00	68.30	69.10
10/26/2021 19:00	76.23	77.10
10/26/2021 18:00	83.20	83.95
10/26/2021 17:00	73.77	74.44
10/26/2021 16:00	66.83	67.47
10/26/2021 15:00	64.39	64.98
10/26/2021 14:00	66.78	67.42
10/26/2021 13:00	67.25	67.88
10/26/2021 12:00	68.86	69.65
10/26/2021 11:00	68.13	68.95
10/26/2021 10:00	69.08	69.94
10/26/2021 09:00	68.45	69.27
10/26/2021 08:00	66.67	67.55
10/26/2021 07:00	70.97	71.80
10/26/2021 06:00	63.15	63.52
10/26/2021 05:00	46.91	47.07
10/26/2021 04:00	39.28	39.20
10/26/2021 03:00	37.00	36.92
10/26/2021 02:00	37.53	37.28
10/26/2021 01:00	39.39	38.87
10/26/2021 00:00	44.17	43.46

# S&P Capital IQ

## ISO Day-Ahead Prices (Data)

Region: PJM

As Of: 10/27/2021

Frequency: Hourly

Peak: Around the clock

<i>Date</i>	<i>AEP GEN HUB</i>	<i>AEP-DAYTON HUB</i>
10/27/2021 23:00	43.13	43.02
10/27/2021 22:00	46.36	46.22
10/27/2021 21:00	53.13	52.98
10/27/2021 20:00	58.88	58.92
10/27/2021 19:00	65.45	65.82
10/27/2021 18:00	69.10	69.32
10/27/2021 17:00	74.58	70.67
10/27/2021 16:00	58.74	56.97
10/27/2021 15:00	59.38	57.68
10/27/2021 14:00	58.99	57.87
10/27/2021 13:00	58.91	57.60
10/27/2021 12:00	64.85	63.04
10/27/2021 11:00	63.35	63.98
10/27/2021 10:00	67.22	68.05
10/27/2021 09:00	67.57	68.30
10/27/2021 08:00	68.19	69.23
10/27/2021 07:00	80.89	81.98
10/27/2021 06:00	71.57	71.82
10/27/2021 05:00	51.76	52.09
10/27/2021 04:00	46.47	46.93
10/27/2021 03:00	41.89	42.32
10/27/2021 02:00	42.85	43.27
10/27/2021 01:00	43.80	44.19
10/27/2021 00:00	45.48	45.88

**ISO Day-Ahead Prices (Data)**

Region: PJM  
 As Of: 10/28/2021  
 Frequency: Hourly  
 Peak: Around the clock

<b>Date</b>	<b>AEP GEN HUB</b>	<b>AEP-DAYTON HUB</b>
10/28/2021 23:00	48.02	48.41
10/28/2021 22:00	53.42	53.90
10/28/2021 21:00	61.60	62.24
10/28/2021 20:00	68.58	69.31
10/28/2021 19:00	75.85	76.84
10/28/2021 18:00	83.41	84.36
10/28/2021 17:00	74.25	74.58
10/28/2021 16:00	70.19	70.26
10/28/2021 15:00	68.35	68.46
10/28/2021 14:00	67.94	68.44
10/28/2021 13:00	68.60	69.07
10/28/2021 12:00	71.42	71.88
10/28/2021 11:00	68.86	70.16
10/28/2021 10:00	71.23	72.49
10/28/2021 09:00	69.32	70.73
10/28/2021 08:00	72.45	73.64
10/28/2021 07:00	79.16	80.07
10/28/2021 06:00	72.05	72.09
10/28/2021 05:00	53.80	53.76
10/28/2021 04:00	45.68	45.65
10/28/2021 03:00	41.36	41.43
10/28/2021 02:00	43.73	43.90
10/28/2021 01:00	45.21	45.39
10/28/2021 00:00	46.87	46.98

# S&P Capital IQ

## ISO Day-Ahead Prices (Data)

Region: PJM

As Of: 10/29/2021

Frequency: Hourly

Peak: Around the clock

<i>Date</i>	<i>AEP GEN HUB</i>	<i>AEP-DAYTON HUB</i>
10/29/2021 23:00	47.07	45.40
10/29/2021 22:00	50.22	48.00
10/29/2021 21:00	56.39	54.04
10/29/2021 20:00	64.11	61.37
10/29/2021 19:00	69.27	66.52
10/29/2021 18:00	77.50	74.75
10/29/2021 17:00	68.74	66.18
10/29/2021 16:00	63.96	61.68
10/29/2021 15:00	63.70	62.11
10/29/2021 14:00	63.92	62.82
10/29/2021 13:00	68.36	67.60
10/29/2021 12:00	67.78	67.54
10/29/2021 11:00	66.62	66.65
10/29/2021 10:00	67.47	67.41
10/29/2021 09:00	67.02	67.23
10/29/2021 08:00	65.93	65.83
10/29/2021 07:00	70.26	70.19
10/29/2021 06:00	55.32	54.70
10/29/2021 05:00	44.71	44.66
10/29/2021 04:00	39.17	39.22
10/29/2021 03:00	38.02	38.04
10/29/2021 02:00	38.32	38.66
10/29/2021 01:00	39.74	40.09
10/29/2021 00:00	42.83	43.17

**ISO Day-Ahead Prices (Data)**

Region: PJM  
 As Of: 10/30/2021  
 Frequency: Hourly  
 Peak: Around the clock

<i>Date</i>	<i>AEP GEN HUB</i>	<i>AEP-DAYTON HUB</i>
10/30/2021 23:00	50.27	50.72
10/30/2021 22:00	58.55	59.06
10/30/2021 21:00	63.37	63.92
10/30/2021 20:00	68.18	68.96
10/30/2021 19:00	79.28	80.41
10/30/2021 18:00	81.83	82.99
10/30/2021 17:00	71.52	72.34
10/30/2021 16:00	66.15	66.80
10/30/2021 15:00	60.33	61.02
10/30/2021 14:00	60.22	61.00
10/30/2021 13:00	62.97	63.80
10/30/2021 12:00	67.33	68.32
10/30/2021 11:00	66.89	67.90
10/30/2021 10:00	67.31	68.26
10/30/2021 09:00	65.80	66.78
10/30/2021 08:00	61.69	62.63
10/30/2021 07:00	58.25	59.10
10/30/2021 06:00	50.99	50.72
10/30/2021 05:00	48.64	48.48
10/30/2021 04:00	47.30	46.61
10/30/2021 03:00	47.48	46.79
10/30/2021 02:00	48.07	47.27
10/30/2021 01:00	50.08	49.25
10/30/2021 00:00	53.01	52.06

**ISO Day-Ahead Prices (Data)**

Region: PJM

As Of: 10/31/2021

Frequency: Hourly

Peak: Around the clock

<b>Date</b>	<b>AEP GEN HUB</b>	<b>AEP-DAYTON HUB</b>
10/31/2021 23:00	49.03	48.35
10/31/2021 22:00	53.34	52.76
10/31/2021 21:00	63.07	62.49
10/31/2021 20:00	71.46	71.04
10/31/2021 19:00	76.26	74.77
10/31/2021 18:00	73.71	71.52
10/31/2021 17:00	62.86	59.92
10/31/2021 16:00	52.69	49.96
10/31/2021 15:00	51.01	48.51
10/31/2021 14:00	50.62	48.39
10/31/2021 13:00	50.85	48.76
10/31/2021 12:00	51.54	50.12
10/31/2021 11:00	52.75	52.05
10/31/2021 10:00	53.10	52.43
10/31/2021 09:00	52.27	51.66
10/31/2021 08:00	51.10	51.26
10/31/2021 07:00	49.32	49.83
10/31/2021 06:00	48.49	48.78
10/31/2021 05:00	49.32	49.59
10/31/2021 04:00	45.97	46.29
10/31/2021 03:00	47.84	48.21
10/31/2021 02:00	49.42	49.77
10/31/2021 01:00	49.83	50.19
10/31/2021 00:00	55.33	55.70

Kentucky Power Company  
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KIUC First Set of Data Requests  
Dated May 9, 2022  
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**DATA REQUEST**

- 1\_5      On October 3, 2002 in Case No. 2000-00495-B, the Commission adopted Kentucky Power's proposed peaking unit equivalent (PUE) proxy methodology. The Commission explained that the FAC "permits an electric utility to recover through its FAC only the lower of the actual energy cost of the non-economy purchased energy or the fuel cost of its highest cost generating unit available to be dispatched to serve native load during the reporting expense month." Under the PUE, Kentucky Power will recover through its FAC "non-economy purchased power costs that are the lower of its actual purchased power cost and the peaking unit equivalent cost" of a hypothetical gas fired peaking plant. The Commission adopted this exception to its FAC regulation because "AEP is unique among Kentucky generators as it operates only base load coal-fired units." With respect to the PUE:
- a. Is there any limit on the amount of purchase power subject to the PUE cap? Please explain.
  - b. If Big Sandy 1, Rockport 1 and 2, and Mitchell 1 and 2 were not available to be dispatched so that 100% of Kentucky Power's energy requirements had to be purchased, would all of that purchase power be subject to the PUE cap?
  - c. If Big Sandy 1, Rockport 1 and 2, and Mitchell 1 and 2 were not operating but were available to be dispatched and 100% of Kentucky Power's energy requirements had to be purchased, how much of that purchase power would be subject to the PUE cap? If the PUE cap was not applicable because all or some of the generating units were available to be dispatched, which generating unit's fuel cost would serve as the purchase power cap?
  - d. If either Rockport Unit was not operating but was available to be dispatched, would the Rockport fuel cost serve as the limit on FAC recovery of purchase power costs or would the PUE cap apply?
  - e. Please explain why the PUE methodology should remain in effect given that Big Sandy 1 is gas fired.

**RESPONSE**

- a. - d. The Company objects to this request on the basis that it calls for legal analysis and a legal opinion which are not appropriate subjects of discovery.

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e. Big Sandy unit 1 is not a combustion gas fired unit. It is a combined cycle unit and the PUE calculation was designed as a proxy mechanism for a higher cost peaking unit natural gas combustion turbine.

Witness: Jason M. Stegall

DIRECT TESTIMONY OF  
ROBERT L. WALTON, ON BEHALF OF  
KENTUCKY POWER COMPANY  
BEFORE THE PUBLIC SERVICE COMMISSION OF KENTUCKY

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I. INTRODUCTION

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Q. WHAT IS YOUR NAME, BUSINESS ADDRESS AND POSITION?

A. My name is Robert L. Walton, and my business address is 1 Riverside Plaza, Columbus, Ohio 43215. I am employed by the American Electric Power Service Corporation ("AEPSC") as Managing Director of Projects. AEPSC supplies engineering, financing, accounting, project management and planning and advisory services to the ten electric operating companies of the American Electric Power ("AEP") System, one of which is Kentucky Power Company ("Kentucky Power" or "Company").

Q. PLEASE BRIEFLY DESCRIBE YOUR EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE.

A. I graduated from The Ohio State University in Columbus, Ohio in 1974 with a Bachelor of Science Degree in Mechanical Engineering. From 1975 to 1978 I was employed by the Babcock and Wilcox Company ("B&W") as a Field Service Engineer. From 1978 to 1985, I was employed by the B&W Construction Company in various positions of increasing responsibility including Site Project Engineer, Site Construction Manager, and ultimately Regional representative, responsible for all aspects of Company business in a five-state area.

I joined American Electric Power ("AEP") in 1985 as a Senior Engineer progressing to Assistant Manager in 1987 and then to Manager of Maintenance Planning

1 impact of the MATS Rule on the Big Sandy Unit 1 conversion is discussed in more detail  
2 in the testimony of Company Witness Wohnhas.

3 Q. WHY IS IT NECESSARY FOR KENTUCKY POWER TO SEEK A ONE-YEAR  
4 EXTENSION UNDER THE RULE, RATHER THAN COMPLETE THE  
5 CONVERSION IN 2015?

6 A. As shown in the Project Schedule in Exhibit RLW-1, the planned 2016 in-service date is  
7 the result of many factors. The Company has not finalized a contract for the gas pipeline  
8 lateral, nor has the company released the contracts for the Architect/Engineering or the  
9 steam generator OEM to proceed with the final detailed engineering and design and the  
10 procurement of the equipment associated with the unit modifications. Additionally, once  
11 Kentucky Power Company has awarded the contract for the pipeline lateral construction,  
12 that company will have its own schedule for engineering, design, procurement, permitting  
13 and construction that must be factored into the overall project schedule. These items,  
14 along with the lead times necessary for procuring and constructing the modified plant  
15 equipment and on-site gas pipeline lateral, make a 2015 in-service date impractical.

16 Aside from the above impacts to the Big Sandy Unit 1 Conversion Project, the  
17 impact of the resolution of Case No. 2012-00578 and transfer of an undivided 50%  
18 interest in the Mitchell generating station to Kentucky Power on the timing of the Project  
19 is discussed in the testimony of Company Witness Wohnhas.

20 IV. NATURAL GAS PIPELINE

21 Q. HOW WILL NATURAL GAS BE PROCURED FOR BIG SANDY UNIT 1?

22 A. Kentucky Power will purchase natural gas as a commodity from gas suppliers and  
23 producers. Due to the fluctuating natural gas requirements associated with the expected

1 peaking operation of the converted facility, Kentucky Power requires flexibility in its  
2 natural gas supply and transportation arrangements. Natural gas volumes needed by  
3 Kentucky Power to match customer load demand require instantaneous, hourly, and daily  
4 flexibility in the delivery flow. To meet these needs, Kentucky Power plans to rely  
5 predominantly on daily spot market natural gas purchases as other AEP affiliates have  
6 historically done for operation of their peaking gas-fired generating plants.

7 Q. HOW WILL NATURAL GAS BE DELIVERED FOR USE AT THE BIG SANDY  
8 PLANT?

9 A. Currently, the Big Sandy Plant does not have provisions for natural gas delivery to the  
10 site. In conjunction with the Project, it will be necessary for a pipeline company to  
11 construct a natural gas pipeline lateral. We envision that this pipeline company will own  
12 the lateral and be responsible for all procurement, engineering, design, construction,  
13 installation, land rights, and permitting activities necessary to place this pipeline in  
14 service. The pipeline company will operate and maintain the facilities necessary to  
15 support the gas delivery, gas temperature, and gas pressure requirements of the Plant. No  
16 natural gas storage is planned at the Big Sandy site.

17 Q. PLEASE DESCRIBE THE PROCESS TO SOLICIT COST ESTIMATES FOR  
18 THE NATURAL GAS PIPELINE WORK.

19 A. AEPSC's Engineering Services, AEPSC's Project, Controls & Construction and  
20 AEPSC's Fuel, Emissions and Logistics ("FEL") organizations worked collaboratively  
21 with Kentucky Power to identify gas quality and delivery requirements for the Plant that  
22 will allow Unit 1 to burn natural gas to meet the capacity and energy needs for Kentucky  
23 Power's customers. FEL then contacted FERC-regulated interstate natural gas pipeline

## Kentucky Power Company

### REQUEST

At the bottom of page 8 and continuing on page 9 of Scott Weaver's direct testimony, he discusses the gas needs of Unit 1 when it is operating primarily as a peaking unit.

- a. Before the conversion to gas, was Big Sandy Unit 1 used primarily as a peaker?
- b. What are the Kentucky Power projections concerning the capacity factor of Big Sandy Unit 1 after conversion and its availability to clear in the PJM market?
- c. How does this peaking statement merge with the statements on page 6 of Weaver's testimony where he proposes that Big Sandy Unit 1 will be able to provide generation ancillary services such as synchronized reserves, day-ahead reserves and voltage support to transmission providers?

### RESPONSE

Note: Each of the references in the question to Mr. Weaver's direct testimony should have been to Mr. Walton's testimony.

- a. Before the conversion to natural gas, the duty cycle of Big Sandy Unit 1 was largely that of an intermediate or "load-following" unit --rather than a peaker, or a baseload unit based on its actual performance. For example, over the last two years (2012 and 2013), the units' average capacity factor was 35.39%; a result higher than a peaker, but lower than a typical baseload unit. Further, the unit's "Net Output Factor"-- which is a function of its actual generation divided by its potential generation when on-line—averaged 52.32% for the same period; a figure typically well below a traditional baseload unit duty cycle.
- b. As an approximate indicator of the ability to clear the PJM market, the going-forward projections in the Strategist modeling for Big Sandy Unit 1 capacity factor after its conversion to natural gas averaged approximately 25% per year.

- c. A generating unit operating in a peaking capacity generally operates with a low capacity factor, which does not preclude such a generating unit from providing the ancillary services described in the testimony of Company witness Walton. Big Sandy Unit 1 will be able to provide the ancillary services described by Company witness Walton if there is a need for those services.

WITNESS: Robert L Walton/Scott C Weaver



[REDACTED]

**October 2021: Use Actual Generation Costs As Purchase Power Cost Cap Instead Of Hypothetical PUE**

<b>Big Sandy 1 295 MW approx. \$55/MWh:</b>	Not Available
<b>Rockport 2 195 MW approx. \$33/MWh:</b>	Not Available
<b>Rockport 1 198 MW approx. \$31/MWh:</b>	Not Available
<b>Mitchell 1 385 MW \$30.01/MWh:</b>	Available 114.57 Hours
<b>Michell 2 395 MW \$20.74/MWh:</b>	Available 504 Hours

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