AEP Coal Generation Benchmarking Analysis 2010 Update

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Generation Business Planning

September 29, 2010

Presented to:

Mark McCullough October 29, 2010

Introduction - Peer Groups

- Units were divided into two primary Peer Groups:
- Supercritical coal units greater than 400 MW
- Subcritical coal units greater than 350 MW (to exclude AEP's disposition units)
- Further subdivided peer groups into scrubbed (prior to 01/01/2008) and unscrubbed

Supercritical Coal Units (> 400 MW)

Peers	77 Units	55,900 MW
AEP*	18 Units	15,965 MW

Count

Subcritical Coal Units (> 350 MW)

	AEP	Peers
пt	8 Units	117 Units
	4.247 MW	66.000 MW

* - Excludes

The peer groupings used in this report allow for a more meaningful analysis than in previous years when units were only grouped by MW rating

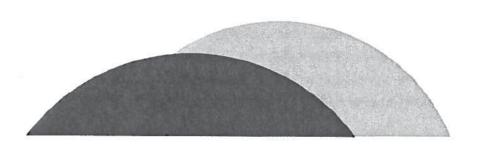
Introduction - Definitions

operations and maintenance expenses, "routine" maintenance capital costs, and other plant support costs (e.g. central engineering). Total Spend does not include fuel costs or "new capital", such as: new environmental equipment; new fuel flexibility projects; new fuel transportation projects; capacity Total Spend - In this report, "Total Spend" represents all increase projects; and new capacity. Scrubbed Units – For the purposes of this report, "scrubbed" units are those units that had an FGD system placed in service prior to January 1, 2008

This definition guarantees at least two years of scrubber cost information Mitchell 1&2, and (For AEP, these units include (subcritical)

32 of the 77 supercritical peer units and 35 of the 117 subcritical peer units meet this definition

Supercritical Units



Supercritical Units - Key Takeaways

These key takeaways will be discussed in this report:

- our peers While AEP Supercritical coal units have begun to provide a series of the peers and our performance continues to the peers.
- The erosion of AEP's stranged ontages for FGD tie-in and balanced draft conversion. However, our peers were able to improve their 5-year EAF, while actually placing a higher percentage of FGDs into service in 2009
- on continuing AEP's Operations spend for supercritical units is our peers, but we are spending Maintenance and Capital

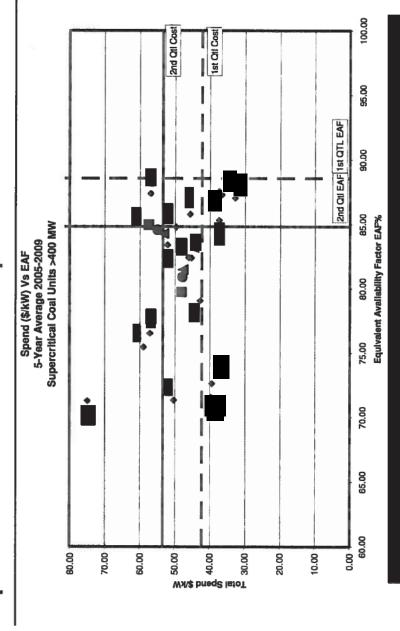
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Supercritical Units - 5-Year Averages

- The table below groups the AEP supercritical units into quartiles based on Equivalent Availability Factor (EAF) performance
- These results will be analyzed relative to peer unit performance on the ensuing pages



Supercritical Units – Spend vs. EAF Trend



than the peer group As a fleet, AEP is

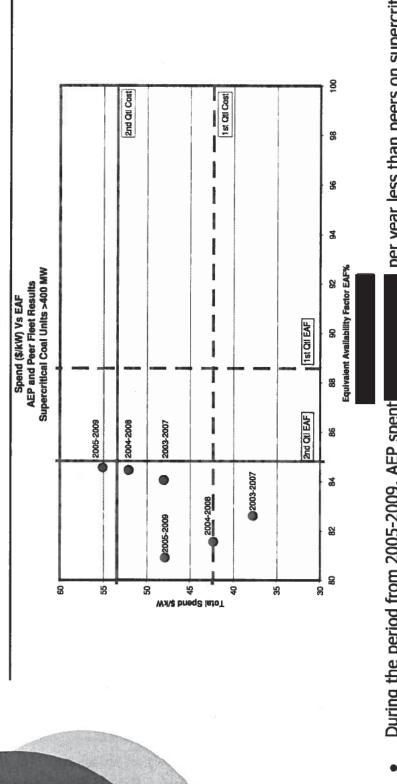
were AEP's top performing supercritical units on a Total Big Sandy 2, Rockport 18/2 and preserve were AEP's t Spend vs. EAF Performance basis over the last five years

continues to be an outlier on Total Spend, and

and Mitchell 1&2 lag the pack on EAF Performance

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Supercritical Units – Spend vs. EAF Trend



- per year less than peers on supercritical per year for AEP's 15,965 MW supercritical fleet During the period from 2005-2009, AEP spent units equates to This
 - AEP's annual spend for supercritical units reached the peer average for the first time in 2009 and AEP had major outage expenditures in 2009 for
- of available generation per year for AEP's supercritical fleet than peers percentage points During this same period, availability was This difference equates to more than

on its supercritical coal fleet versus our peers, and our unit direction availability continues to AEP continues to

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Supercritical Units – Performance Factors

Supercritical Coal Units (>400 MW)

Comparison with Navigant Units 2005-2009 Quartiles

Equivalent 93.94 Availability Pactor (EAF)	Planned Outlage Pactor (POP)	Equivalent 1.60 Unplanned Outage Fector (EUOP)	Net Heat Rate (NHR)	OALS + Capted (SAW)	OAM + Cupfled (\$MWh)	Fuel (\$THEWIL)	Fuel (\$MMBtu)	Best 1st Quartile
81.57	89	575	1294	8C28	\$4.65	\$16.85	2918	ije.
				H.	387 387			2nd Quartile
45 a	5	327	87.2 H 2	thest the state of	3078	2 E E E E E E E E E E E E E E E E E E E	9	Median 3rd Ouartie
St.52 (64.5)	AN APPEN SIN BRA	22.7 AP But 3445, FF7 333 AP Wat (7.495,	AB Worst 1,307	\$65,000 S123 APP Ball: \$27.27 (PAY) APP Worst, \$78.11	APP Best: 64.8 perch	AEP Bac: 613/1 (1872)	42.29 (\$1.29 Back \$1.29 Back A1.59 Back A1.50 Back \$1.20 Back \$1.2	4th Cuartile Worst

AEP's 5-year EAF has moved from _____ last year into the fourth quartile at

This reduction in EAF is primarily driven by the extended outages required for FGD tie-in and balanced draft conversion

Peer unit 5-year EAF improved slightly from 6 to with FGDs going into service in 2009

It is believed that many peer units already had balanced draft designs and were therefore able to have shorter outage times than AEP

6, in spite of having a greater percentage of units (14 out of 77) than AEP

Peers were able to improve 5-year EAF on supercritical coal units, and at the same time place a greater percentage of unit FGD systems on line in 2009 versus AEP

to peer

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Supercritical Units – Quartile Summaries

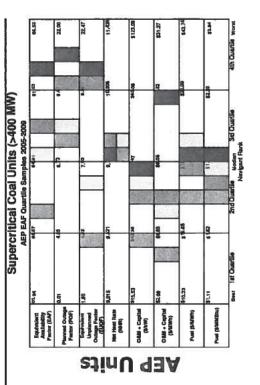
The charts to the right separate the units into quartiles based on 5-year EAF, and then show how those same units performed on each metric

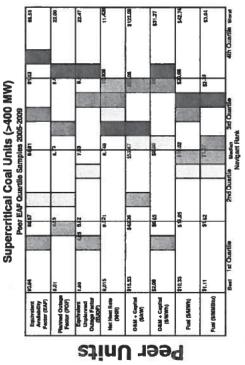
 i.e. the green block represents the same set of units throughout the chart, as do the yellow, orange and red blocks





These charts show that the top two EAFbased quartiles of peer units benefit from very low POF and EUOF, while the corresponding quartiles of AEP units have a



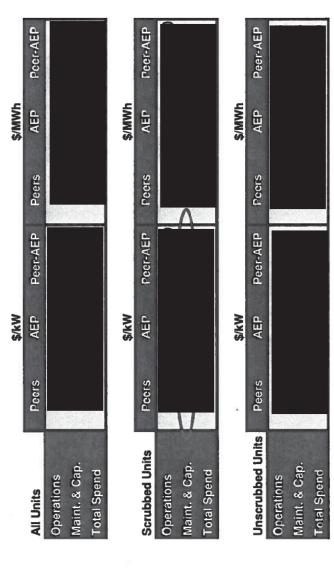




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Supercritical Units – Cost Summaries

The tables below break down the 5-year average spends for scrubbed and unscrubbed units into Operations and continuing Maintenance & Capital components



- AEP is in alignment overall with the peers on Operations spend
- is a concern, as it is nearly than Operations Costs for than the unit that was nampered by significant unavailability However, AEP's Operations Cost for and Mitchell, and it is even
 - Of particular interest are the Maintenance & Capital spe<u>nds for</u> scrubbed units (circled in green)
- AEP is spending the property on a \$/kW basis, and the precipitator work done in 2009 drives this latter result)
- AEP's capital budget constraints have limited our ability to accomplish continuing maintenance and capital work in addition to the Environmental Program

to our peers, but we are spending significantly on continuing Maintenance and Capital AEP's costs for Operations are

Supercritical Units – Performance Trends

The charts to the right show how AEP supercritical unit single-year EAF, POF and EUOF have trended versus peer units

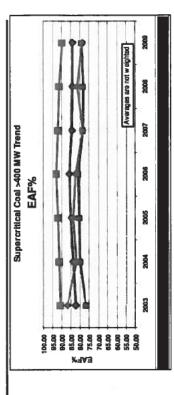
Note that peer unit samples that make up the quartile breakpoints from year to year may represent different units.

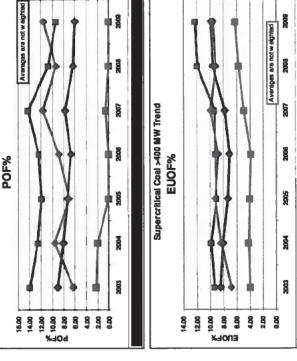


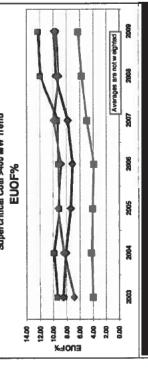
The decreasing POF trend is counter-balanced by an increasing EUOF trend

Supercritical Coal >400 MW Trend

- Peer unit POF is decreasing despite the large number of FGD installations they have completed
- AEP has an increasing EUOF trend similar to the peers, but AEP POF is also increasing, which has driven the EAF lower over time
 - In addition to FGD tie-in outages, we are beginning to see the effects of corrosion and other material problems in the recent generation of FGD equipment
- were in various stages of FGD implementation had significant generator problems shortly after it returned from its tie-in outage plamed on maintenance work that was AEP's recent EUOF performance has been highly driven by the and the second highly driven by the second highly driv could be deferred awaiting the tie-in outages The increased EUOF at







AEP'S

Our peers have held EAF flat by reducing POF while at the same time installing a greater percentage of FGD systems is largely driven by an

since 2006, but the emerging FGD

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Supercritical Units - Scrubbed Units

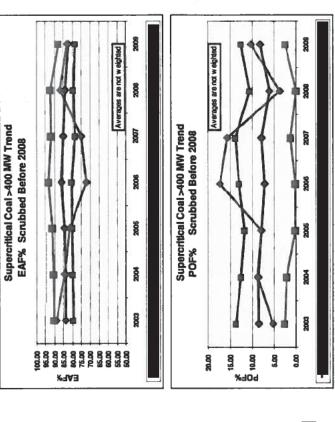
Peer unit performance for supercritical scrubbed units is consistent with the performance previously stated for the total set of supercritical units

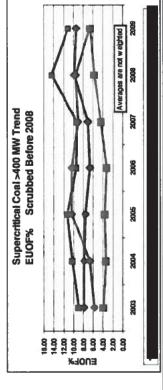
- The EAF trendlines are essentially flat
 - POF has a slightly decreasing trend
- EUOF has a slightly increasing trend





- AEP units will continue to have downward pressure on sa we address that are surfacing with the new scrubber designs
- AEP supercritical scrubbed units are showing improvement in EUOF
 - 2009, and the Mitchell units are very close to the top quartile
 - lags in this area

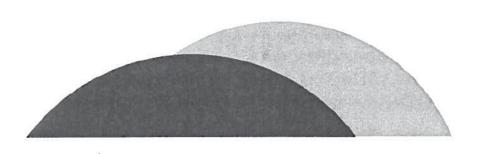




AEP's scrubbed supercritical units are showing a

will continue to put

Subcritical Units



Subcritical Units – Key Takeaways

These key takeaways will be discussed in this section of the report:

- Unlike with the Supercritical coal units, AEP is spending well in excess of our peers on subcritical units
- This overspend is driven by Operations costs on the four scrubbed units, most notably
 - Similar to the supercritical units, AEP's subcritical unit performance has slipped versus the peers
- Our peers were able to trend their average POF slightly downward, while at the same time adding scrubbers to 18% of their units
- Conversely, with zero new FGD installations, AEP subcritical unit POF has been in the fourth quartile versus peers four out of the last five years

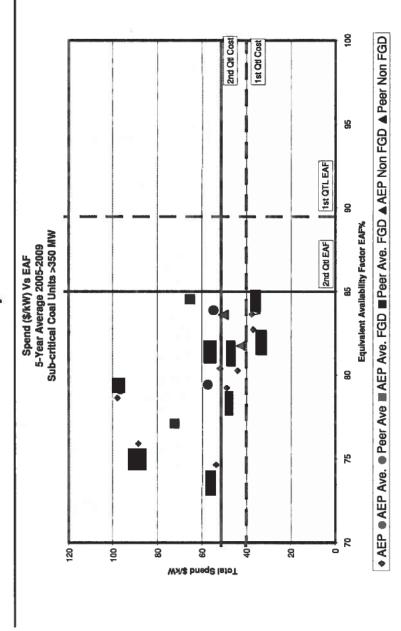
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Subcritical Units – 5-Year Averages

- The table below groups the AEP subcritical units into quartiles based on Equivalent Availability Factor (EAF) performance
- These results will be analyzed relative to peer unit performance on the ensuing pages



Subcritical Units – Spend vs. EAF Trend

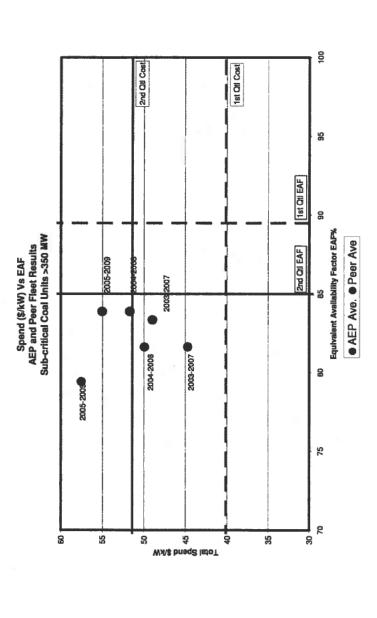


- (2008) have driven AEP's subcritical unit 5-year Total Spend above the peer average (2009) and The extended outages for
- since 2008 Only 5 of the 117 peer units (4.2%) had annual \$/kW spends as high as
 - All but one of AEP's subcritical units have a lower 5-year EAF than the peer average

The Spend at

have a significant effect on the Total Spend for the AEP subcritical fleet relative to the peers

Subcritical Units – Spend vs. EAF Trend



- per year more than peers on subcritical During the period from 2005-2009, AEP spent| units
- per year for AEP's 4,247 MW subcritical fleet This overspend equates to
- and 2009 for AEP's spend includes major outage expenditures in 2008 for
- of available generation per year for AEP's subcritical fleet percentage points lower than peers During this same period, availability was
 - This difference equates to more than

AEP is now

on its subcritical coal fleet versus our peers, but our unit versus the peers availability continues to

versus the peers, and

Subcritical Units – Performance Factors

Sub-critical Coal Units (>350 MW)

Comparison with Navigant Units 2005-2009 Quartiles

Equivalent	96.36	65.40		94.50		2		ğ
Pactor (EAF)					9 E	12	AP Work 74.07	
Manned Outege Rector (POF)	**	3		3	•	ğ	AP Work 1447	Zardz
Equivalent Unplanned Outage Factor (BJOF)	15 0	9		7.14	a s	971	AEP Worst 14.80%	à III
Met Hent Rate (MIR)	2.	890'01		10,267	0 H 2	9	AEP Back 10,346 AEP Wornt 10,734	2
O&M + Capital (\$7M)	1973	State		9795		200	AEP Back (37.34 AEP Worst, 898.3	3
O&M + Capital (\$flatti)	973	68.28		\$2.25	9 37	\$10.15	AEP Book \$5.72 AEP Work \$14.53	
Fuel (STMMh)	19081	9.018		\$16.53	<u> </u>	1	AEP Black bits At	
Fuel (\$Millettu)	22.00	IL18		\$1.61	a 5	d	AEP Worst 61.39	a
	Best 1st Quartile	Quartile	2nd Quartile New	Median Navigant Renk	3rd Quartile		4th Quartile Worst	Į .
	ATP. =2005-24	=2005 2009 AEP Average Unvergited			=3005.34	009 Semple	-2005-2009 Semple Ave Unancighted	

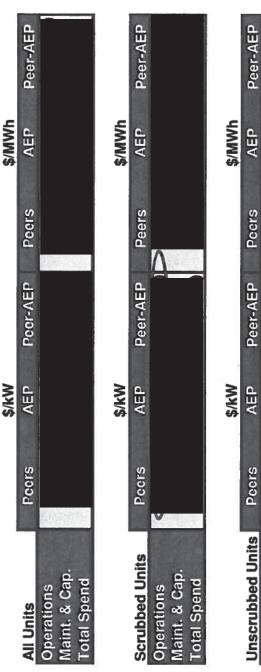
All other metrics for AEP units are near the peer group average performance

well into the all other measures fall in the has AEP's subcritical coal fleet

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Subcritical Units – Cost Summaries

The tables below break down the 5-year average spends for scrubbed and unscrubbed units into Operations and continuing Maintenance & Capital components:



Unscrubbed Units	Peers	AEP	Peer-AEP	Peers	AEP	Peer-AEP
perations						
Maint. & Cap.						
Fotal Spend						

- In stark contrast with the supercritical units, AEP's total spend on its scrubbed subcritical units the peers as well as AEP's unscrubbed units
- The driver is in the operations cost (circled in green), more specifically AEP's costs for NOx allowances, lime and overhauls at on Maintenance and Capital of unscrubbed units the peers by AEP is

the peers as well as AEP's unscrubbed units AEP's Total Spend on it's scrubbed subcritical units

in the last five years, a fact which has

Subcritical Units – Performance Trends

The charts to the right show how AEP subcritical unit single-year EAF, POF and EUOF have trended versus peer units

Peer unit EAF has been relatively flat at 85% since 2003

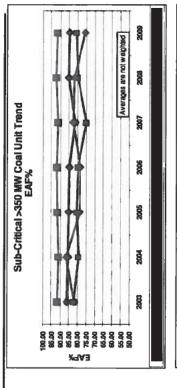
As with the supercritical peer units, the slightly decreasing POF trend is counter-balanced by an increasing EUOF trend

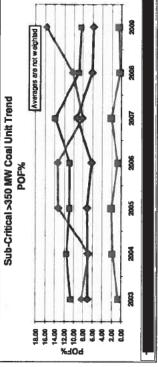
21 of the 117 peer units installed FGD systems after 2005 (AEP subcritical units had zero FGD installations during this period), 15 of those coming in the last two years when the peer average POF was the lowest

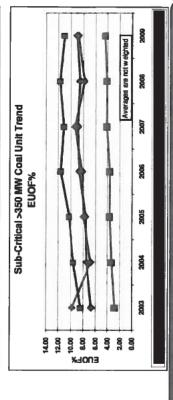
AEP's EUOF trend tightly lines up with the peer average, but AEP POF has been in the fourth quartile four out of the last five years

The dominant drivers are the extended planned outages at in 2008, and at in 2008, and at an and in 2009 in 2009

Last year, we attributed AEP's high subcritical POF to the fact that many units have hot-side precipitators. However, further analysis has shown that these same units have a high POF even when compared to peer units with hot side precipitators







Six of AEP's eight subcritical units have had

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AEP Coal Generation Benchmarking Analysis 2011 Update

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2011

Introduction - Peer Groups

- Units were divided into two primary Peer Groups:
- Supercritical coal units greater than 400 MW
- Subcritical coal units greater than 350 MW (to exclude AEP's disposition units)
- Report primarily reviews Unit and Fleet Spend for Operations and Maintenance, with a short review of SCR, FGD and Allowance expenditures at the end

Supercritical Coal Units (> 400 MW)

	AEP*	Peers**
Count	18 Units	70 Units
MC	15,965 MW	51,500 MW

Subcritical Coal Units (> 350 MW)

	AEF	Feers**
Count	8 Units	92 Units
O	4,247 MW	52,600 MW

* - Excludes

** - Excluded units with less than the full 5 yrs of data, this eliminates 7 supercritical units with 4,400 MW & 25 Subcrit units with 13,400 MW from the prior report.

The separation of the environmental spend allows for a more straight forward review of the standard operations non-environmental spend for maintenance and operations

operations and maintenance expenses, "routine" maintenance capital Spend does not include fuel costs or "new capital", such as: new costs, and other plant support costs (e.g. central engineering). environmental equipment; new fuel flexibility projects; new fuel transportation projects; capacity increase projects; and new Total Spend - In this report, "Total Spend" represents all capacity. Spend for FGDs, SCRs is handled separately - For the purposes system placed in service prior to January 1, 2009 (to show at least of this report, the FGD/SCR units are those peer units that had a two years of operating cost)

Peer groups:

Supercritical units - 11 peer units had FGDs only, 26 units had both FGD & SCR and 11 had SCRs only Subcritical units - 23 peer units had FGDs only, 19 units had both FGD & SCR and 16 had SCRs only

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Supercritical Units – Key Takeaways

These key takeaways will be discussed in this report:

- the peers on maintenance and our performance For the current 5 year period (2006 – 2010) AEP's Supercritical coal units versus the peers continued to
- of AEP's 5-year EAF is driven both by extended outages for FGD tiein/balanced draft conversion and Forced Outages
- that of our peers AEP's Operations spend for supercritical units is I
- quartile or Q1) were generally also in the lowest spending quartiles (Q1 & Q2) in 4 out of the five years with one year of increased spend. These same units also increasing the spend at the next opportunity and addressing all expect liabilities performed well in availability with % of them performing in Q1 or Q2 (best two The peer units spending the least on maintenance on a five year basis ($1^{
 m st}$ quartiles) for EAF, EFOR & EUOF. This may indicate that, for select units, and reducing the funding in the following years could yield positive value.

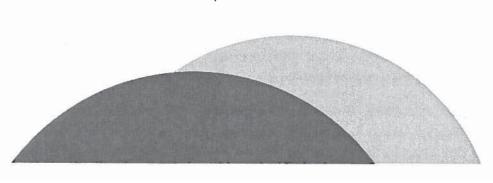
Subcritical Units - Key Takeaways

These key takeaways will be discussed in this report:

- than our peers on AEP, excluding ________ is spending the subcritical Maintenance and in Total
 - for land Operations was AEP's 5 year average spend, excluding Maintenance was
- than the and Operations Was The 5 year average spend a<u>t</u> peers for both Maintenance
- AEP has averaged EAF which was driven by both EF(
 percentage points per year) and POF (
 than the peers

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Supercritical Units

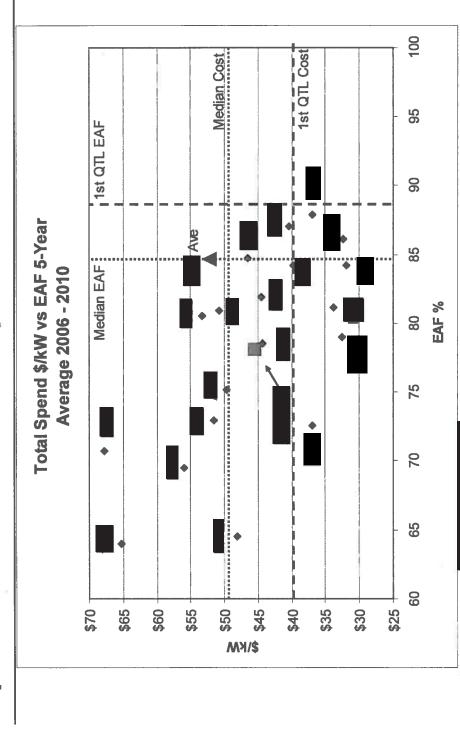


Supercritical Units - 5-Year Averages

The table below groups the AEP supercritical units into Peer group quartiles for EFOR These results will be analyzed relative to peer unit performance on the ensuing pages

	-)							
Unit	EAF	EFOR	POF	EUOF	NCF	Total Spend (\$/MWh)	Total Spend (\$/kW)	Fuel \$/MWh	Peer EFOR Quartile
ROCKPORT 1		2.9	9.9	5.3		\$5.07	237.00	\$19.71	01
BIG SANDY 2 ROCKPORT 2		5.4	5 5 5 5	7.9		\$4.86 \$4.60	\$32.42 \$31.92	\$24.65 \$20.79	02
MITCHELL 2		8.9	10.2	10.7		\$5.19	\$32.58	\$18.39	Q3
MITCHELL 1	198	12.3	13.5	13.8		86.58	\$36.94	\$19.80	04
AEP Fleet Average Peer Median Peer Best Quartile									

Supercritical Units - Spend vs. EAF Trend

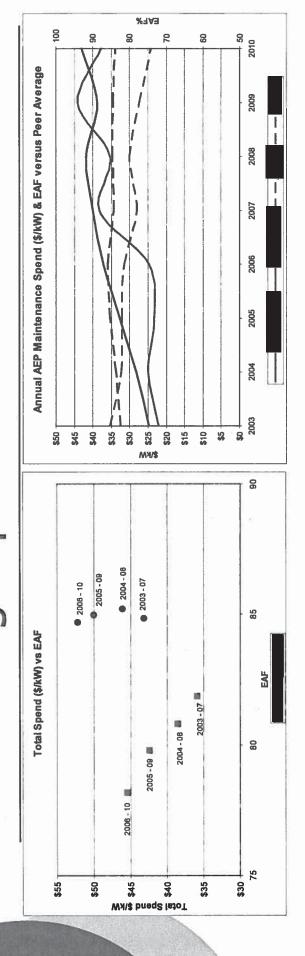


Rockport 1, Big Sandy 2 and were AEP's top performing supercritical units on a Total Spend vs. EAF Performance basis over the last five years than the peer group As a fleet, AEP is

Redacted Attachment 1
Page 29 of 42 continue to be outliers on Total Spend, with lagging the fleet in EAF Performance ಹ

Average Spend vs. EAF Trend

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- During the period from 2006-2010, AEP spent less per year than the peer average on a \$/kW basis per year) less in the most recent period (approximately **AEP** spent
 - the peers on a \$/MWh basis (by AEP also spent slightly |
 - On an annual basis
- than the AEP's annual Maintenance spend for supercritical units on a \$/kW basis has been peer average except for 2009

and

- than peers and Net Primary driver for the 2009 spend spike were major outage expenditures for
 - percentage points During the current 5 year period, availability was Capacity Factor was percentage points

AEP continues to availability

on its supercritical coal fleet versus our peers, and our unit

.⊑

in 2009 and

=2006-2010 Sample Avg. Unweighted

for the period ending in 2008 to

moving from

=2006-2010 AEP Avg. Unweighted

T.

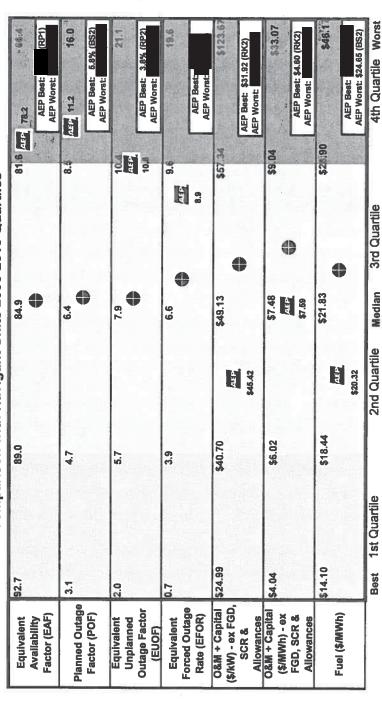
Navigant Rank

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Supercritical Units - Performance Factors

Supercritical Coal Units (>400 MW)

Comparison with Navigant Units 2006-2010 Quartiles



in EAF is driven by both POF and EFOR, including extended outages required for FGD tie-in and balanced AEP's 5-year EAF continues it's 2010 The in draft conversion

in 2008 in 2009 and from Peer unit 5-year EAF continues it's slight improvement progress moving to

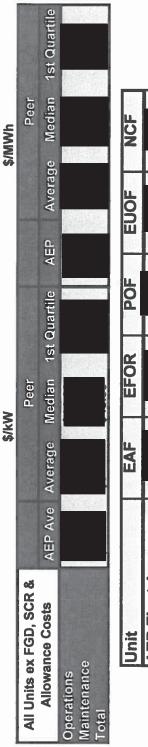
for EAF, EUOF and EFOR performed worst than any peer unit Note that AEP's worst performing unit (

Peers were able to

5-year EUOF, both as an absolute

Supercritical Units – Cost Summaries

- The table below breaks down the 5-year average spends into Operations and continuing Maintenance & Capital components excluding FGD, SCR and Allowance Costs
- AEP performed well overall in comparison to the peers on Operations spend
- Most units performed in the first and second (lowest cost) quartiles (5 of 20 units fell into the 3rd quartile and none were in the 4th quartile)
- The lowest cost unit was Rockport 2 at \$0.95/MWh and the highest cost unit was at
- less on Maintenance than the peer EAF, EUOF, EFOR and NCF performance On a \$/kW basis, AEP is spending approximately average which, coupled with the indicates that spending
- Note The total is the sum of Operations and Maintenance spend and not the same as the spend seen on slide 6



Unit	EAF	EFOR	POF	EUOF	NCF
AEP Fleet Average					
Peer Median	247.			2	
Peer Best Quartile		2	10		

our peers for both Operations and Maintenance, costs for Operations of Compared to our peers, with Maintenance spending less than with spe was in the 1st quartile compared to our peers, with Maintenance spending peer average in \$/kW (the **AEP's spends**

EAF Trend

100

Supercritical Units - Performance Trends

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These charts show how AEP supercritical unit single-year EAF, NCF, POF and EFOR have trended versus peer units

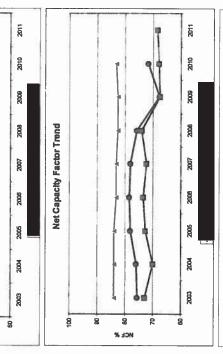
- Note that peer unit samples that make up the quartile breakpoints from year to year may represent different
- EAF for Peer units (both 1st Quartile and average units), has been relatively flat for the period. AEP's average EAF

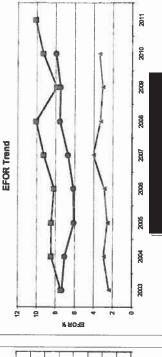
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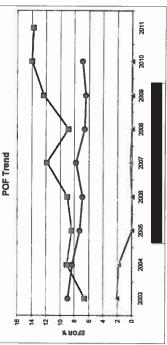
% ±VE

over the period while the Peer average units show a drop below the average range in the last 2-3 years. NCF for the 1st Quartile units has been relatively flat

The EFOR trend shows increases for all units, with the Peer average unit having a 4% higher EFOR than the in the last two years st Ouartile units and and shows







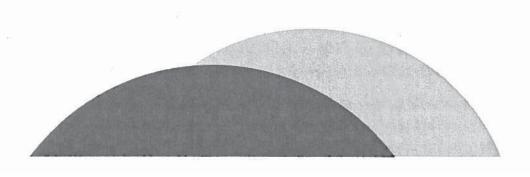
reducing POF while

AEP's

EAF is

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Subcritical Units

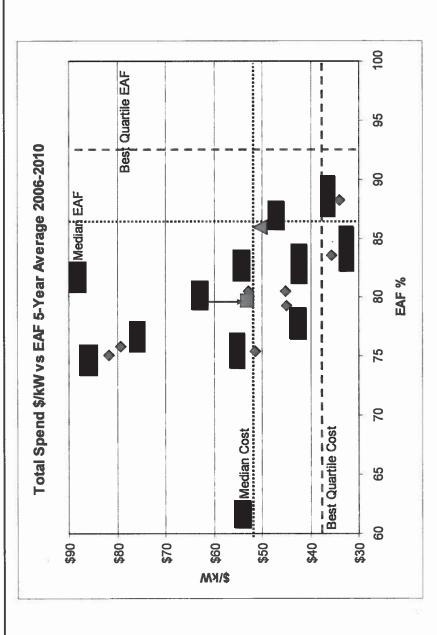


Subcritical Units — 5-Year Averages

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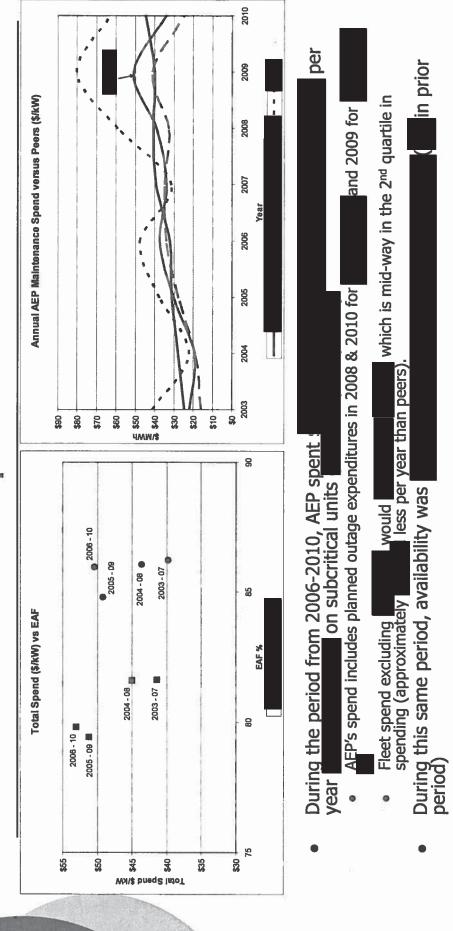
						Total	Total		
n T	FAF	EFOR	POF	EUOF	NCF	Spend (\$/MWh)	Spend (\$/kw)	Fuel	Peer EFOR
									2000
									02
									0.2
									0.4
									0.4
									0.4
									0.4
									0.4
AEP Fleet Average									
Peer Median									
Peer Best Quartile									

Subcritical Units - Spend vs. EAF Trend





Subcritical Units – Spend vs. EAF Trend



Subcritical Units - Performance Factors

-- Confidential -- For Internal Use Only --

Sub-critical Coal Units (>350 MW)

Comparison with Navigant Units 2006-2010 Quartiles

Equivalent	93.2	89.7		86.7		83.7 TT. 78.8	r. 78.8 69.6	
Availability Factor (EAF)				*			AEP Best: AEP Worst	AT T
Planned Outage	0.0	ග ෆ්		9.6		8	A15 20.2	AEP AEP Awerage
ractor (POF)							AEP Best: AEP Worst:	Unweighted
Equivalent	1.0	4.1		6.5		8.8	28.0	
Outage Factor (EUOF)						8.7. E.T.	AEP Best: AEP Worst:	0
Equivalent	9.0	2.8		4.9	•	7.	24.4	Sample Average
Rate (EFOR)						7.6	AEP Best: AEP Worst:	Unweighted
O&M + Capital	\$20.34	\$38.65		2		\$58.36	\$122.88	80
SCR &			4/1		. 2		AEP Best: AEP Worst:	
O&M + Capital	\$3.28	\$5.61		\$7.22	2	\$9.08	\$18.26	92
FGD, SCR & Allowances				0	E S		AEP Best: AEP Worst:	GI
	\$0.76	\$12.63		\$18.71		\$27.36	847.87	12
Fuel (\$/MWh)				₩	6 22.62		AEP Best: AEP Worst:	
	Best	1st Quartile	2nd Quartile	Median	3rd Quartile		4th Quartile Worst	١ _٣

anc AEP's EAF performance was driven by both extended planned outages as well as Forced &/or Maintenance Outages in two or more years at

The financial metrics show the AEP units are

Note – All AEP units were in

AEP's subcritical coal fleet all other measures

Subcritical Units – Cost Summaries

- The tables below break down the 5-year average spends into Operations and continuing Maintenance & Capital components:
- In contrast with the supercritical units, AEP's total spend on its subcritical units
- with the fleet at Operations costs were also coming in at excluding
- Note The total is the sum of Operations and Maintenance spend and not the same as the spend seen on slide 14

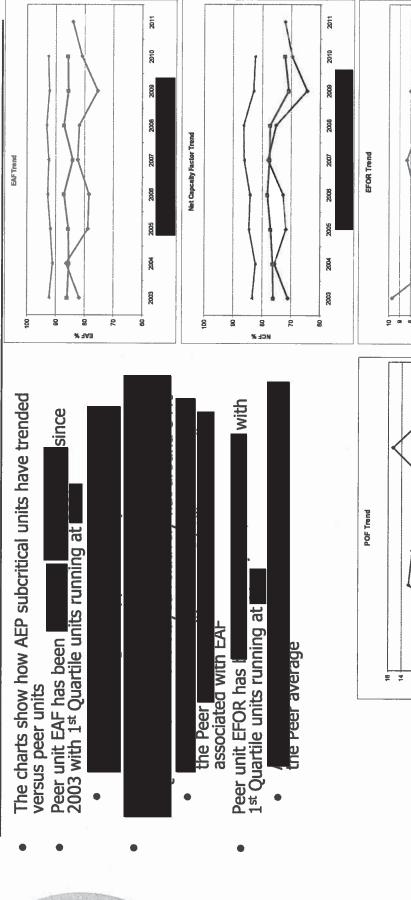
All Units ex FGD, SCR & AEP Av		-					
ance Costs		Peer				Peer	
Operations	AEP Ave Average	Median	Median 1st Quartile AEP Ave Average	AEP Ave	Average	Median	Median 1st Quartile
Operations							
Maintenance							
Total							
				THE RESERVE THE PERSON NAMED IN	The second second second second second		

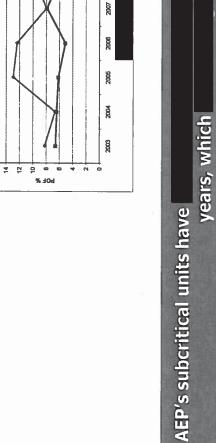
Φ

OHIL	EAF	TOTA X	2	EUOF	NCF
AEP Fleet Average			1973		No.
Peer Median			17s		
Peer Best Quartile	44				

EFOR %

Subcritical Units – Performance Trends





FGD, SCR and Allowance Costs

FGD, SCR and Allowance costs are shown separately from other costs for two primary reasons

- First, AEP fleet results were largely driven, for both the super and subcritical units, by a few units with the rest of the fleet operating close to the peers
 - Second, some of the cost differential may be due to the specific rules and regulations covering each unit and



were close to the Peers with annual average spend at the annual average spend was

The AEP Subcritical FGD annual average spend

This was largely driven by

and

See next page for table values

FGD and SCR Costs

Supercritical Units		\$	\$/kW			S/MWh	Wh	
FGD Operation &	がある。	SECTION AND PROPERTY.	Peer		BENEFIT IN	THE SECTION SECTION	Peer	STATE STATE STATE
Maintenance	AEP Ave	Average	Median	1st Quartile	AEP	Average	Median	1st Onartile
Operations								all dual to
Maintenance								
Total Spend								
SCR Operation &	2				America of	No. of Concession, Name of Street, or other Persons and Street, or other P		
Maintenance	AEF Ave	Average	Median	1st Quartile	AEP	Average	Median	1st Quartile
Operations								
Maintenance								
Total Spend								
Allowances	AEP Ave	Average	Median	1st Quartile	AEP	Average	Median	1st Onartile
Total Spend								
Allowance costs for units with allowance	ith allowance c	costs						

Subcritical Units		9	\$/kW			\$/MWh	Wh	
FGD Operation &			Peer			RANGE STATE	Peer	STATE OF STREET
Maintenance	AEP Ave	Average	Median	1st Quartile	AEP	Average	Median	Median 1st Onartile
Operations								To a delical
Maintenance								
Total Spend								
Allowances	AEP Ave	Average	Median	1st Quartile	AFP	Average	Median	Median 1st Ouartile
Total Spend								ist waarin

0

Allowance costs for units with allowance costs, for AEP -