VERIFICATION

The undersigned, John A. Rogness III being duly sworn, deposes and says he is the Director Regulatory Services for Kentucky Power Company, that he has personal knowledge of the matters set forth in the forgoing responses for which he is the identified witness and that the information contained therein is true and correct to the best of his information, knowledge and belief

COMMONWEALTH OF KENTUCKY)
Case No. 2017-00001
COUNTY OF FRANKLIN)

Subscribed and sworn to before me, a Notary Public in and before said County and State, by John A Rogness III, this the 18th day of May, 2017.

Notary Public

John A Rogness I

Notary ID: <u>571144</u>

My Commission Expires: <u>January 23, 2021</u>

VERIFICATION

The undersigned, Charles F. West, being duly sworn, deposes and says he is the Manager, Coal Procurement, for American Electric Power Service Corporation, that he has personal knowledge of the matters set forth in the forgoing data response for which he is identified as the witness and that the information contained therein is true and correct to the best of his information, knowledge and belief

STATE OF OHIO

COUNTY OF FRANKLIN

Case No. 2017-00001

Subscribed and sworn to before me, a Notary Public in and before said County and State, by Charles F. West, this the 25 day of May 2017.

Gina L. Beyer Notary Public, State of Ohio My Commission Expires 07-01-2021

My Commission Expires: <u>07-01-2021</u>

Case No. KPCO 2017-00001 Commission Staff's April 18, 2017 Post Hearing Data Requests Item No. 1 Page 1 of 1 Witness: John A. Rogness

Q - 1 For the review period, provide a schedule showing where Big Sandy Unit 1 fell in the dispatch order after its conversion to a natural gas-fired unit.

A - 1 PJM dispatches available units on an economic basis. PJM dispatches MWs starting with the lowest cost MW first in order of ascending cost until the demand is satisfied. Whether an available unit is actually dispatched in any given hour of the day is dependent on total demand, the market clearing Locational Marginal Pricing, and each individual unit's cost curve.

Assume demand in a given hour is 100 MW and there are two 100 MW units competing to provide the energy. Unit 1 is offered at \$55 MW for its first 75 MW and \$65 for the last 25 MW. Unit 2 is offered at \$60 for its first 50 MW and \$70 for its second 50 MW. All other considerations aside, PJM would dispatch 75 MW from Unit 1 at \$55 MW and 25 MW from Unit 2 at \$60 MW to meet the 100 MW demand.

Because each available unit bid into the Day Ahead market and dispatched in the Real Time Market is competing against all other available units, an individual unit's dispatch order may vary multiple times throughout the day.

KPCO_R_KPSC_PH_1_Attachment1_Confidential.xls provides the the monthly average offer bids into PJM of Big Sandy Unit 1, Mitchell Units 1 and 2, and Rockport Units 1 and 2 for the months June 2016 - October 2016. As such, it can be used to approximate the monthly dispatch order of each of the five units. Big Sandy Unit 1's relative dispatch order based on the monthly average offer bids also is shown on KPCO R KPSC PH 1 Attachment1 Confidential.xls.

Case No. KPCO 2017-00001 Commission Staff's April 18, 2017 Post Hearing Data Requests Item No. 2 Page 1 of 2 Witness: John A. Rogness

- **Q-2** Refer to the attachment to Kentucky Power's response to Item 13 of the Commission's February 6, 2017 Request for Information ("Commission's First Request").
 - a.. The fourth column of the attachment is labeled "Assoc. Company interchange." Explain what the column represents and why there is data only for the month of June 2015-November of 2015.
 - b. The last column of the attachment shows that line loss fluctuated during the review period from a low of (4.348) percent to a high of 9.549 percent. State whether this fluctuation is related to the difference in billing cycles and the difficulty of trying to match kWh sales with kWh generated and purchased. If not, provide the reason for the variations.
- A 2

 2a. Accounts 44700001 and 44700151 were used to record certain sales in connection with Ohio deregulation during the period June 2015 through November 2015. These accounts were listed under "Associated Company Interchange" instead of "System Sales for Resale". Kentucky Power discovered the mislabeling and credited customers in the December 2015 fuel adjustment clause filing (November 2015 expense month) with the \$3,309,951 revenues associated with the sales recorded in Accounts 44700001 and 44700151. Beginning with the December 2015 expense month, accounts 4470001 and 44700151 were moved under "System Sales for Resale." Please also refer to the Company's response to PHDR-1 in Case No. 2016-00230.

The "Associated Company Interchange" column of KPCO_R_KPSC_1_13_Attachment1.pdf reflects the kWh of sales recorded in Accounts 44700001 and 44700151. The "Associated Company Interchange" column is populated with data only for the months of June 2015 through November 2015 for the reasons described above.

Case No. KPCO 2017-00001 Commission Staff's April 18, 2017 Post Hearing Data Requests Item No. 2 Page 2 of 2

2b. Yes. More particularly, the billed and accrued method employed by Kentucky Power adjusts load to be consistent with internal energy. Included in the calculation of "energy lost and unaccounted" each month is an estimate of unbilled energy sales. This estimate, which is premised upon multiple inputs such as number of days in a billing cycle, temperature, and weather, can vary markedly from month to month.

Each month's calculation of "energy lost and unaccounted" includes the reversal of the prior month's estimated unbilled energy sales and inclusion of the current month's estimated unbilled energy sales. The monthly variability in large part reflects differences in the amounts of the reversal of the prior month's estimate and the current month's estimate accounts for much of the variability.

Case No. KPCO 2017-00001 Commission Staff's April 18, 2017 **Post Hearing Data Requests** Item No. 3 Page 1 of 1

Witness: Charles F. West

- Q-3Refer to Kentucky Power's response to Item 27 of the Commission's First Request. Explain why contract 07-00-13-002 shown on Kentucky Power's Analysis of Coal Purchases in its Fuel Adjustment Clause ("FAC") backup filing is not included in Response to Item 27.
- A 3 The tonnage shown on the May 2016 Monthly Backup filing reflects an accounting adjustment related to omitted payments for prior deliveries. The 07-00-13-002 contract expired in December 31, 2015 following receipt of all deliveries; no deliveries were made in 2016. Kentucky Power did not include the contract in its response because no deliveries were made under the expired contract during the period inquired about in KPSC 1-27.

Case No. KPCO 2017-00001 Commission Staff's April 18, 2017 Post Hearing Data Requests Item No. 4 Page 1 of 1 Witness: John A. Rogness

- **Q-4** Provide Kentucky Power's calculations and supporting data for determining the amount of power purchases in excess of the "peaking unit equivalent" that were excluded from recovery through the FAC for each month of the review period May 1, 2016, through October 31, 2016.
- **A 4** Please see KPCO_R_KPSC_PH_4_Attachment1_Confidential.xlsx for the requested information. Confidential treatment is being sought for portions of this response.