

**COMMONWEALTH OF KENTUCKY**  
**BEFORE THE PUBLIC SERVICE COMMISSION**

In the Matter of:

RIVERSIDE GENERATING COMPANY, L.L.C.	)	
	)	
v.	)	Case No. 2017-00472
	)	
KENTUCKY POWER COMPANY	)	

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**RIVERSIDE GENERATING COMPANY, L.L.C.'S RESPONSE TO  
COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION**

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**Filed: April 20, 2018**

**Riverside Generating Company, L.L.C.**  
**Case No. 2017-00472**  
**Commission Staff's First Request for Information**

1. Refer to the Direct Testimony of Anthony Hammond (“Hammond Testimony”), page 2, line 20 through page 3, line 4.
  - a. State the date that the Zelda generating station began service with Kentucky Power Company (“Kentucky Power”) and the rate schedule under which it was served.
  - b. State the date that the Foothills generating station began service with Kentucky Power and the rate schedule under which it was served.
  - c. Provide a copy of the bills received by Riverside from Kentucky Power for service to the Zelda and Foothills generating stations for service for the calendar year 2017 to date.

**Response:**

- a. Upon information and belief, Riverside’s Zelda generating station began service with Kentucky Power in or around November 2000 and was served under the utility’s Tariff N.U.G. and charged the rates prescribed in tariff schedule Quantity Power – Transmission, Code 360.
- b. Upon information and belief, Riverside’s Foothills generating station began service with Kentucky Power in or around February 2002 and was served under the utility’s Tariff N.U.G. and charged the rates prescribed in tariff schedule Quantity Power – Transmission, Code 360.
- c. Please see Page 2 through Page 33 of this Response.



Account Number

[REDACTED]

CY 31

8458656

<b>\$84,586.56</b>	\$ _____
Total Amount Due	Amount Enclosed
<b>Due Jan 20 , Add \$4,229.33 After This Date</b>	

Send Inquiries To:  
PO BOX 24401  
CANTON, OH 44701-4401  
R-03-LT1201A004

2549-1  
030002549 01 AV 0.373



RIVERSIDE GENERATING COMPANY LLC  
RIVERSIDE/FOOTHILLS GENERATING CO  
25038 HIGHWAY 23  
CATLETTSBURG, KY 41129-8635

Make Check Payable and Send To:  
**KENTUCKY POWER COMPANY**  
PO BOX 24410  
CANTON OH 44701-4410



0084586560088815890100000000000348736861904012201031900008

Please tear on dotted line

Return top portion with your payment

Service Address:  
**RIVERSIDE GENERATING COMPANY LLC**  
HIGHWAY 23  
CATLETTSBURG, KY 41129-9802

Rate Tariff: Industrial Gnl Service-360

Page 1 of 2

Account Number	Total Amount Due	Due Date
[REDACTED]	\$84,586.56	Jan 20, 2017
Meter Number	Cycle-Route	Bill Date
Lt1201a004	31-97	Jan 4, 2017

**Previous Charges:**

Total Amount Due At Last Billing	\$ 82,205.61
Payment 12/21/16 - Thank You	-82,205.61
<b>Previous Balance Due</b>	<b>\$ .00</b>

**Current KPCO Charges:**

<b>Tariff 360 - Industrial Gnl Service</b>	12/31/16
Rate Billing	\$ 62,140.62
Fuel Adj @ 0.0048008 Per KWH	3,802.23
Kentucky Economic Development Surcharge	.15
Capacity Charge @ 0.0007320 Per KWH	579.74
Big Sandy 1 Operation Rider @ 0.0014100 Per KWH	1,116.72
Big Sandy 1 Operation Rider @ \$1.1400000 Per KW	3,748.32
Purchased Power Adj 0.1278000%	91.23
Big Sandy Retirement Rider 5.4339000%	2,557.92
Environmental Adj 17.1773000%	8,085.94
School Tax	2,463.69
<b>Current Electric Charges Due</b>	<b>\$ 84,586.56</b>

**Total Amount Due \$84,586.56**

**Due Jan 20 , Add \$4,229.33 After This Date**

Questions About Bill or Service, Call:  
1-888-710-4237  
Pay By Phone: 1-800-611-0964

**KPCO Messages**

Register for online services at [www.KentuckyPower.com](http://www.KentuckyPower.com). Registration is **free and easy** and gives you the convenience of 24-hour access to your account. You can sign up for paperless billing, view your bill, check your usage, update your contact information, and much more.

**Make this the last bill sent in the mail.** Gain more security and trust and Go Paperless to get an email notification when your bill is ready. Today is the Day! AEP Paperless.com.

Visit us at [www.KentuckyPower.com](http://www.KentuckyPower.com)  
Rates available on request  
See other side for Important Information



Meter Number	Service Period		Meter Reading Detail			
	From	To	Previous	Code	Current	Code
LT1204A035	11/30	12/31	21183	Actual	21717	Actual
Multiplier	1,000.0000		Metered Usage 534,000 KWH			
LT1201A004	11/30	12/31	13964	Actual	14222	Actual
Multiplier	1,000.0000		Metered Usage 258,000 KWH			
LT1204A035	11/30	12/31	0.000	Actual	1.012	Actual
Multiplier	1,000.0000		Metered Usage 1,012.000 KW Off-Pk			
LT1204A035	11/30	12/31	0.000	Actual	2.132	Actual
Multiplier	1,000.0000		Metered Usage 2,132.000 KW On-Pk			
LT1201A004	11/30	12/31	0.000	Actual	1.584	Actual
Multiplier	1,000.0000		Metered Usage 1,584.000 KW Off-Pk			
LT1201A004	11/30	12/31	0.000	Actual	0.400	Actual
Multiplier	1,000.0000		Metered Usage 400.000 KW On-Pk			
LT1204A035	11/30	12/31	0.000	Actual	1.804	Actual
Multiplier	1,000.0000		Metered Usage 1,804.000 KVAR			

Rate Tariff: Industrial Gnl Service-360

Send Inquiries To:  
PO BOX 24401  
CANTON, OH 44701-4401  
R-03-LT1201A004  
2549-1

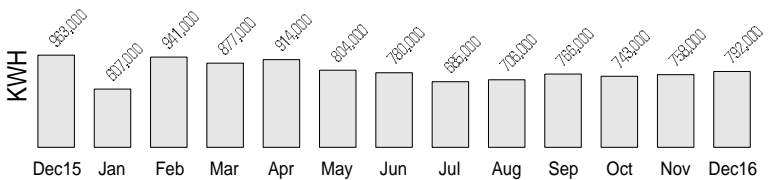
Service Address:  
RIVERSIDE GENERATING COMPANY  
LLC  
HIGHWAY 23  
CATLETTSBURG, KY 41129-9802

Account Number	Total Amount Due	Due Date
[REDACTED]	\$84,586.56	Jan 20, 2017
Meter Number	Cycle-Route	Bill Date
Lt1201a004	31-97	Jan 4, 2017

Meter Number	Service Period	Meter Reading Detail				
Number	From	To	Previous	Code	Current	Code
LT1201A004	11/30	12/31	0.000	Actual	0.000	Actual
Multiplier	1,000.0000		Metered Usage		0.000 KVAR	

Next scheduled read date should be between Jan 30 and Feb 2

**13 Month Usage History**      **Total KWH for Past 12 Months is 9,544,000**



Month	Total KWH	Days	KWH Per Day	Cost Per Day	Average Temperature
Current	792,000	31	25,548	\$2,728.60	32°F
Previous	758,000	30	25,267	\$2,740.19	50°F
One Year Ago	963,000	31	31,065	\$1,768.79	48°F

Your Average Monthly Usage: 795,333 KWH

Adjusted Usage 12/16				
	Power Factor	Power Factor Constant	Comp. Meter Multiplier	Billing Usage
Metered Usage				
792,000				792,000 KWH
2,532,000				2,532,000 KW On-Pk
2,596,000				2,596,000 KW Off-Pk
1,804,000				506,000 KVAR
Contract Capacity = 3,100.0			High Prev Demand = 5,480.0 On-Pk	
			High Prev Demand = 5,480.0 Off-Pk	

**Additional Messages**



Send Inquiries To:  
PO BOX 24401  
CANTON, OH 44701-4401  
R-03-LT1201A004

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030002557 01 AV 0.37

RIVERSIDE GENERATING COMPANY LLC  
RIVERSIDE/FOOTHILLS GENERATING CO  
25038 HIGHWAY 23  
CATLETTSBURG, KY 41129-8635

Account Number  
CY 31  
8365637

<b>\$83,370.81</b>	\$
Total Amount Due	Amount Enclosed
<b>Due Feb 20, Add \$4,168.54 After This Date</b>	

Make Check Payable and Send To:  
KENTUCKY POWER COMPANY  
PO BOX 24410  
CANTON OH 44701-4410



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Please tear on dotted line

Return top portion with your payment

Service Address:  
RIVERSIDE GENERATING COMPANY  
LLC  
HIGHWAY 23  
CATLETTSBURG, KY 41129-9802

Rate Tariff: Industrial Gnl Service-360

Page 1 of 2

Account Number	Total Amount Due	Due Date
[REDACTED]	\$83,370.81	Feb 20, 2017
Meter Number	Cycle-Route	Bill Date
Lt1201a004	31-97	Feb 2, 2017

Questions About Bill or Service, Call:  
1-888-710-4237  
Pay By Phone: 1-800-611-0964

**KPCO Messages**

Make this the last bill sent in the mail. Gain more security and trust and Go Paperless to get an email notification when your bill is ready. Today is the Day! AEP Paperless.com.

**Previous Charges:**

Total Amount Due At Last Billing \$ 84,586.56  
Payment 01/20/17 - Thank You -84,586.56  
**Previous Balance Due \$ .00**

**Current KPCO Charges:**

**Tariff 360 - Industrial Gnl Service 01/31/17**  
Rate Billing \$ 63,920.02  
Fuel Adj @ 0.0021534 Per KWH 1,843.31  
Kentucky Economic Development Surcharge .15  
Capacity Charge @ 0.0007320 Per KWH 626.59  
Big Sandy 1 Operation Rider @ 0.0014100 Per KWH 1,206.96  
Big Sandy 1 Operation Rider @ \$1.1400000 Per KW 3,748.32  
Purchased Power Adj 0.1066000% 76.05  
Big Sandy Retirement Rider 5.4339000% 2,499.55  
Environmental Adj 15.8673000% 7,298.83  
School Tax 2,436.59  
**Current Electric Charges Due \$ 83,656.37**  
Deposit Interest Applied \$ -285.56

**Total Amount Due \$83,370.81**  
**Due Feb 20, Add \$4,168.54 After This Date**

Meter Number	Service Period		Meter Reading Detail			
	From	To	Previous	Code	Current	Code
LT1204A035	12/31	01/31	21717	Actual	22274	Actual
Multiplier	1,000.0000		Metered Usage 557,000 KWH			
LT1201A004	12/31	01/31	14222	Actual	14521	Actual
Multiplier	1,000.0000		Metered Usage 299,000 KWH			
LT1204A035	12/31	01/31	0.000	Actual	2.748	Actual
Multiplier	1,000.0000		Metered Usage 2,748.000 KW Off-Pk			
LT1204A035	12/31	01/31	0.000	Actual	1.304	Actual
Multiplier	1,000.0000		Metered Usage 1,304.000 KW On-Pk			
LT1201A004	12/31	01/31	0.000	Actual	0.528	Actual
Multiplier	1,000.0000		Metered Usage 528.000 KW Off-Pk			
LT1201A004	12/31	01/31	0.000	Actual	1.560	Actual
Multiplier	1,000.0000		Metered Usage 1,560.000 KW On-Pk			

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Rate Tariff: Industrial Gnl Service-360

Page 2 of 2

Send Inquiries To:  
PO BOX 24401  
CANTON, OH 44701-4401  
R-03-LT1201A004  
  
2557-1

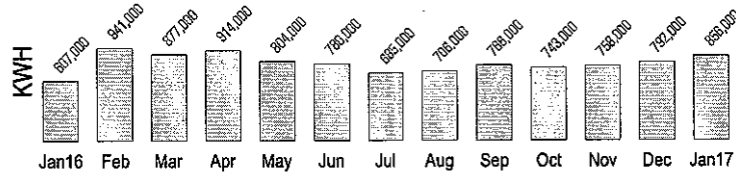
Service Address:  
RIVERSIDE GENERATING COMPANY  
LLC  
HIGHWAY 23  
CATLETTSBURG, KY 41129-9802

Account Number	Total Amount Due	Due Date
[REDACTED]	\$83,370.81	Feb 20, 2017
Meter Number	Cycle-Route	Bill Date
Lt1201a004	31-97	Feb 2, 2017

Meter Number	Service Period	Meter Reading Detail				
Number	From	To	Previous	Code	Current	Code
LT1204A035	12/31	01/31	0.000	Actual	1.892	Actual
Multiplier 1,000.0000		Metered Usage 1,892.000 KVAR				
LT1201A004	12/31	01/31	0.000	Actual	0.000	Actual
Multiplier 1,000.0000		Metered Usage 0.000 KVAR				

Next scheduled read date should be between Feb 27 and Mar 2

13 Month Usage History Total KWH for Past 12 Months is 9,373,000



Month	Total KWH	Days	KWH Per Day	Cost Per Day	Average Temperature
Current	856,000	31	27,613	\$2,698.59	31°F
Previous	792,000	31	25,548	\$2,728.60	32°F
One Year Ago	607,000	31	19,581	\$1,829.07	30°F

Your Average Monthly Usage: 781,083 KWH

Adjusted Usage 01/17				
Metered Usage	Power Factor	Power Factor Constant	Comp. Meter Multiplier	Billing Usage
856,000				856,000 KWH
2,864,000				2,864,000 KW On-Pk
3,276,000				3,276,000 KW Off-Pk
1,892,000				254,000 KVAR

Contract Capacity = 3,100.0 High Prev Demand = 5,480.0 On-Pk  
High Prev Demand = 5,480.0 Off-Pk

Additional Messages

BATCH DATE: \_\_\_\_\_  
 BATCH NO: \_\_\_\_\_  
 DOC REF NO: \_\_\_\_\_  
 ACCOUNT NO: 655020  
K1067

APPROVED FOR PAYMENT  
  
 STEVEN R. HOLBROOK  
 RIVERSIDE



Account Number

[REDACTED]

CY 31

8252814

<b>\$82,528.14</b>	\$ _____
Total Amount Due	Amount Enclosed
<b>Due Mar 20 , Add \$4,126.41 After This Date</b>	

Send Inquiries To:  
PO BOX 24401  
CANTON, OH 44701-4401  
R-03-LT1201A004

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RIVERSIDE GENERATING COMPANY LLC  
RIVERSIDE/FOOTHILLS GENERATING CO  
25038 HIGHWAY 23  
CATLETTSBURG, KY 41129-8635

Make Check Payable and Send To:  
**KENTUCKY POWER COMPANY**  
PO BOX 24410  
CANTON OH 44701-4410



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Service Address:  
**RIVERSIDE GENERATING COMPANY LLC**  
HIGHWAY 23  
CATLETTSBURG, KY 41129-9802

Rate Tariff: Industrial Gnl Service-360

Page 1 of 2

Account Number	Total Amount Due	Due Date
[REDACTED]	\$82,528.14	Mar 20, 2017
Meter Number	Cycle-Route	Bill Date
Lt1201a004	31-97	Mar 2, 2017

**Previous Charges:**

Total Amount Due At Last Billing	\$ 83,370.81
Payment 02/21/17 - Thank You	-83,370.81
<b>Previous Balance Due</b>	<b>\$ .00</b>

**Current KPCO Charges:**

<b>Tariff 360 - Industrial Gnl Service</b> 02/28/17	
Rate Billing	\$ 64,254.08
Fuel Adj @ 0.0014427 Per KWH	1,223.41
Kentucky Economic Development Surcharge	.15
Capacity Charge @ 0.0007320 Per KWH	620.74
Big Sandy 1 Operation Rider @ 0.0014100 Per KWH	1,195.68
Big Sandy 1 Operation Rider @ \$1.1400000 Per KW	3,748.32
Purchased Power Adj 0.0142000-%	-10.09
Big Sandy Retirement Rider 5.4339000%	2,557.24
Environmental Adj 13.8860000%	6,534.88
School Tax	2,403.73
<b>Current Electric Charges Due</b>	<b>\$ 82,528.14</b>

**Total Amount Due \$82,528.14**

**Due Mar 20 , Add \$4,126.41 After This Date**

Questions About Bill or Service, Call:  
1-888-710-4237  
Pay By Phone: 1-800-611-0964

**KPCO Messages**

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Rates available on request  
See other side for Important Information

Meter Number	Service Period		Meter Reading Detail			
	From	To	Previous	Code	Current	Code
LT1204A035	01/31	02/28	22274	Actual	22785	Actual
Multiplier	1,000.0000		Metered Usage 511,000 KWH			
LT1201A004	01/31	02/28	14521	Actual	14858	Actual
Multiplier	1,000.0000		Metered Usage 337,000 KWH			
LT1204A035	01/31	02/28	0.000	Actual	0.868	Actual
Multiplier	1,000.0000		Metered Usage 868.000 KW Off-Pk			
LT1204A035	01/31	02/28	0.000	Actual	0.852	Actual
Multiplier	1,000.0000		Metered Usage 852.000 KW On-Pk			
LT1201A004	01/31	02/28	0.000	Actual	0.548	Actual
Multiplier	1,000.0000		Metered Usage 548.000 KW Off-Pk			
LT1201A004	01/31	02/28	0.000	Actual	0.532	Actual
Multiplier	1,000.0000		Metered Usage 532.000 KW On-Pk			
LT1204A035	01/31	02/28	0.000	Actual	1.800	Actual
Multiplier	1,000.0000		Metered Usage 1,800.000 KVAR			



Rate Tariff: Industrial Gnl Service-360

Send Inquiries To:  
PO BOX 24401  
CANTON, OH 44701-4401  
R-03-LT1201A004  
3606-1

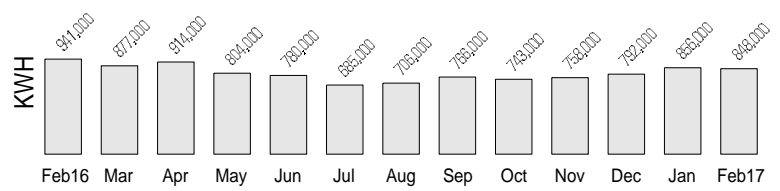
Service Address:  
RIVERSIDE GENERATING COMPANY  
LLC  
HIGHWAY 23  
CATLETTSBURG, KY 41129-9802

Account Number	Total Amount Due	Due Date
[REDACTED]	\$82,528.14	Mar 20, 2017
Meter Number	Cycle-Route	Bill Date
Lt1201a004	31-97	Mar 2, 2017

Meter	Service Period		Meter Reading Detail			
Number	From	To	Previous	Code	Current	Code
LT1201A004	01/31	02/28	0.000	Actual	0.000	Actual
Multiplier	1,000.0000		Metered Usage		0.000 KVAR	

Next scheduled read date should be between Mar 30 and Apr 4

**13 Month Usage History**      **Total KWH for Past 12 Months is 9,622,000**



Month	Total KWH	Days	KWH Per Day	Cost Per Day	Average Temperature
Current	848,000	28	30,286	\$2,947.43	46°F
Previous	856,000	31	27,613	\$2,698.59	31°F
One Year Ago	941,000	29	32,448	\$2,113.49	38°F

Your Average Monthly Usage: 801,833 KWH

Adjusted Usage 02/17				
	Power	Power Factor	Comp. Meter	
Metered Usage	Factor	Constant	Multiplier	Billing Usage
848,000				848,000 KWH
1,384,000				1,384,000 KW On-Pk
1,416,000				1,416,000 KW Off-Pk
1,800,000				1,092,000 KVAR
Contract Capacity = 3,100.0			High Prev Demand = 5,480.0 On-Pk	
			High Prev Demand = 5,480.0 Off-Pk	

**Additional Messages**





Account Number

[REDACTED]

CY 31

8251443

<b>\$82,514.43</b>	\$ _____
Total Amount Due	Amount Enclosed
<b>Due Apr 21 , Add \$4,125.72 After This Date</b>	

Send Inquiries To:  
PO BOX 24401  
CANTON, OH 44701-4401  
R-03-LT1201A004

3716-1  
030003716 01 AV 0.37



RIVERSIDE GENERATING COMPANY LLC  
RIVERSIDE/FOOTHILLS GENERATING CO  
25038 HIGHWAY 23  
CATLETTSBURG, KY 41129-8635

Make Check Payable and Send To:  
**KENTUCKY POWER COMPANY**  
PO BOX 24410  
CANTON OH 44701-4410



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Please tear on dotted line

Return top portion with your payment

Service Address:  
**RIVERSIDE GENERATING COMPANY LLC**  
HIGHWAY 23  
CATLETTSBURG, KY 41129-9802

Rate Tariff: Industrial Gnl Service-360

Page 1 of 2

Account Number	Total Amount Due	Due Date
[REDACTED]	\$82,514.43	Apr 21, 2017
Meter Number	Cycle-Route	Bill Date
Lt1201a004	31-97	Apr 5, 2017

**Previous Charges:**

Total Amount Due At Last Billing	\$ 82,528.14
Payment 03/20/17 - Thank You	-82,528.14
<b>Previous Balance Due</b>	<b>\$ .00</b>

**Current KPCO Charges:**

<b>Tariff 360 - Industrial Gnl Service</b> 03/31/17	
Rate Billing	\$ 63,060.58
Fuel Adj @ 0.0034566 Per KWH	2,875.89
Kentucky Economic Development Surcharge	.15
Capacity Charge @ 0.0007320 Per KWH	609.02
Big Sandy 1 Operation Rider @ 0.0014100 Per KWH	1,173.12
Big Sandy 1 Operation Rider @ \$1.1400000 Per KW	3,748.32
Purchased Power Adj 0.2822000%	201.68
Big Sandy Retirement Rider 5.4339000%	2,609.43
Environmental Adj 12.1465000%	5,832.91
School Tax	2,403.33
<b>Current Electric Charges Due</b>	<b>\$ 82,514.43</b>

**Total Amount Due \$82,514.43**

**Due Apr 21 , Add \$4,125.72 After This Date**

Questions About Bill or Service, Call:  
1-888-710-4237  
Pay By Phone: 1-800-611-0964

**KPCO Messages**

**Stealing copper is illegal** and can have deadly consequences. **Reporting copper theft** could save a life, so if you have any information, **please call 1-866-747-5845.**

**Make this the last bill sent in the mail.** Gain more security and trust and Go Paperless to get an email notification when your bill is ready. Today is the Day! AEPpaperless.com.

Visit us at [www.KentuckyPower.com](http://www.KentuckyPower.com)  
Rates available on request  
See other side for Important Information



Meter Number	Service Period		Meter Reading Detail			
	From	To	Previous	Code	Current	Code
LT1204A035	02/28	03/31	22785	Actual	23277	Actual
Multiplier	1,000.0000		Metered Usage 492,000 KWH			
LT1201A004	02/28	03/31	14858	Actual	15198	Actual
Multiplier	1,000.0000		Metered Usage 340,000 KWH			
LT1204A035	02/28	03/31	0.000	Actual	2.060	Actual
Multiplier	1,000.0000		Metered Usage 2,060.000 KW Off-Pk			
LT1204A035	02/28	03/31	0.000	Actual	0.000	Actual
Multiplier	1,000.0000		Metered Usage 0.000 KW On-Pk			
LT1201A004	02/28	03/31	0.000	Actual	1.384	Actual
Multiplier	1,000.0000		Metered Usage 1,384.000 KW Off-Pk			
LT1201A004	02/28	03/31	0.000	Actual	2.616	Actual
Multiplier	1,000.0000		Metered Usage 2,616.000 KW On-Pk			
LT1204A035	02/28	03/31	0.000	Actual	1.792	Actual
Multiplier	1,000.0000		Metered Usage 1,792.000 KVAR			

Rate Tariff: Industrial Gnl Service-360

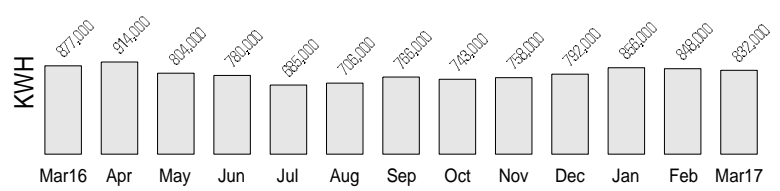
Send Inquiries To:  
PO BOX 24401  
CANTON, OH 44701-4401  
R-03-LT1201A004  
3716-1

Service Address:  
RIVERSIDE GENERATING COMPANY  
LLC  
HIGHWAY 23  
CATLETTSBURG, KY 41129-9802

Account Number	Total Amount Due	Due Date
[REDACTED]	\$82,514.43	Apr 21, 2017
Meter Number	Cycle-Route	Bill Date
Lt1201a004	31-97	Apr 5, 2017

Meter	Service Period		Meter Reading Detail			
Number	From	To	Previous	Code	Current	Code
LT1201A004	02/28	03/31	0.000	Actual	0.000	Actual
Multiplier	1,000.0000		Metered Usage		0.000 KVAR	
Next scheduled read date should be between Apr 28 and May 3						

**13 Month Usage History**      **Total KWH for Past 12 Months is 9,529,000**



Month	Total KWH	Days	KWH Per Day	Cost Per Day	Average Temperature
Current	832,000	31	26,839	\$2,661.76	47°F
Previous	848,000	28	30,286	\$2,947.43	46°F
One Year Ago	877,000	31	28,290	\$2,371.38	52°F
Your Average Monthly Usage: 794,083 KWH					

Adjusted Usage 03/17				
Metered Usage	Power Factor	Power Factor Constant	Comp. Meter Multiplier	Billing Usage
832,000				832,000 KWH
2,616,000				2,616,000 KW On-Pk
3,444,000				3,444,000 KW Off-Pk
1,792,000				70,000 KVAR
Contract Capacity = 3,100.0			High Prev Demand = 5,480.0 On-Pk	
			High Prev Demand = 5,480.0 Off-Pk	

**Additional Messages**



Account Number

[REDACTED]

CY 31

8145340

<b>\$81,453.40</b>	\$ _____
Total Amount Due	Amount Enclosed
<b>Due May 17 , Add \$4,072.67 After This Date</b>	

Send Inquiries To:  
PO BOX 24401  
CANTON, OH 44701-4401  
R-03-LT1201A004

5035-1  
030005035 01 AB 0.40



RIVERSIDE GENERATING COMPANY LLC  
RIVERSIDE/FOOTHILLS GENERATING CO  
25038 HIGHWAY 23  
CATLETTSBURG, KY 41129-8635

Make Check Payable and Send To:  
**KENTUCKY POWER COMPANY**  
PO BOX 24410  
CANTON OH 44701-4410



00814534000855260701000000000000348736861901051905031900008

Please tear on dotted line

Return top portion with your payment

Service Address:  
**RIVERSIDE GENERATING COMPANY LLC**  
HIGHWAY 23  
CATLETTSBURG, KY 41129-9802

Rate Tariff: Industrial Gnl Service-360

Page 1 of 2

Account Number	Total Amount Due	Due Date
[REDACTED]	\$81,453.40	May 17, 2017
Meter Number	Cycle-Route	Bill Date
Lt1201a004	31-97	May 1, 2017

**Previous Charges:**

Total Amount Due At Last Billing	\$ 82,514.43
Payment 04/18/17 - Thank You	-82,514.43
<b>Previous Balance Due</b>	<b>\$ .00</b>

**Current KPCO Charges:**

<b>Tariff 360 - Industrial Gnl Service</b> 04/30/17	
Rate Billing	\$ 62,161.32
Fuel Adj @ 0.0024696 Per KWH	1,955.92
Kentucky Economic Development Surcharge	.15
Capacity Charge @ 0.0007320 Per KWH	579.74
Big Sandy 1 Operation Rider @ 0.0014100 Per KWH	1,116.72
Big Sandy 1 Operation Rider @ \$1.1400000 Per KW	3,748.32
Purchased Power Adj 0.9849000%	685.12
Big Sandy Retirement Rider 5.4339000%	2,588.26
Environmental Adj 13.1119000%	6,245.42
School Tax	2,372.43
<b>Current Electric Charges Due</b>	<b>\$ 81,453.40</b>

**Total Amount Due \$81,453.40**

**Due May 17 , Add \$4,072.67 After This Date**

Questions About Bill or Service, Call:  
1-888-710-4237  
Pay By Phone: 1-800-611-0964

**KPCO Messages**

Register for online services at [www.KentuckyPower.com](http://www.KentuckyPower.com). Registration is **free and easy** and gives you the convenience of 24-hour access to your account. You can sign up for paperless billing, view your bill, check your usage, update your contact information, and much more.

**Make this the last bill sent in the mail.** Gain more security and trust and Go Paperless to get an email notification when your bill is ready. Today is the Day! AEP Paperless.com.

Visit us at [www.KentuckyPower.com](http://www.KentuckyPower.com)  
Rates available on request  
See other side for Important Information



Meter Number	Service Period		Meter Reading Detail			
	From	To	Previous	Code	Current	Code
LT1204A035	03/31	04/30	23277	Actual	23764	Actual
Multiplier	1,000.0000		Metered Usage 487,000 KWH			
LT1201A004	03/31	04/30	15198	Actual	15503	Actual
Multiplier	1,000.0000		Metered Usage 305,000 KWH			
LT1204A035	03/31	04/30	0.000	Actual	0.832	Actual
Multiplier	1,000.0000		Metered Usage 832.000 KW Off-Pk			
LT1204A035	03/31	04/30	0.000	Actual	1.208	Actual
Multiplier	1,000.0000		Metered Usage 1,208.000 KW On-Pk			
LT1201A004	03/31	04/30	0.000	Actual	0.516	Actual
Multiplier	1,000.0000		Metered Usage 516.000 KW Off-Pk			
LT1201A004	03/31	04/30	0.000	Actual	1.648	Actual
Multiplier	1,000.0000		Metered Usage 1,648.000 KW On-Pk			
LT1204A035	03/31	04/30	0.000	Actual	1.964	Actual
Multiplier	1,000.0000		Metered Usage 1,964.000 KVAR			

Rate Tariff: Industrial Gnl Service-360

Send Inquiries To:  
PO BOX 24401  
CANTON, OH 44701-4401  
R-03-LT1201A004

5035-1

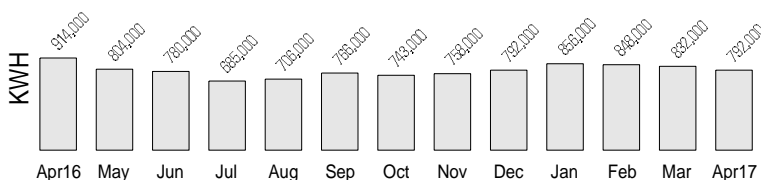
Service Address:  
RIVERSIDE GENERATING COMPANY  
LLC  
HIGHWAY 23  
CATLETTSBURG, KY 41129-9802

Account Number	Total Amount Due	Due Date
[REDACTED]	\$81,453.40	May 17, 2017
Meter Number	Cycle-Route	Bill Date
Lt1201a004	31-97	May 1, 2017

Meter Number	Service Period	Meter Reading Detail				
Number	From	To	Previous	Code	Current	Code
LT1201A004	03/31	04/30	0.000	Actual	0.000	Actual
Multiplier	1,000.0000		Metered Usage		0.000 KVAR	

Next scheduled read date should be between May 30 and Jun 2

**13 Month Usage History**      **Total KWH for Past 12 Months is 9,484,000**



Month	Total KWH	Days	KWH Per Day	Cost Per Day	Average Temperature
Current	792,000	30	26,400	\$2,715.11	62°F
Previous	832,000	31	26,839	\$2,661.76	47°F
One Year Ago	914,000	30	30,467	\$2,100.44	58°F

Your Average Monthly Usage: 790,333 KWH

Contract Capacity = 3,100.0	High Prev Demand = 5,480.0 On-Pk
	High Prev Demand = 5,480.0 Off-Pk

**Additional Messages**



A unit of American Electric Power



Account Number

[REDACTED]

CY 31

8378382

<b>\$83,783.82</b>	\$ _____
Total Amount Due	Amount Enclosed
<b>Due Jun 19 , Add \$4,189.19 After This Date</b>	

Send Inquiries To:  
PO BOX 24401  
CANTON, OH 44701-4401  
R-03-LT1201A004

2393-1  
030002393 01 AV 0.37



RIVERSIDE GENERATING COMPANY LLC  
RIVERSIDE/FOOTHILLS GENERATING CO  
25038 HIGHWAY 23  
CATLETTSBURG, KY 41129-8635

Make Check Payable and Send To:  
**KENTUCKY POWER COMPANY**  
PO BOX 24410  
CANTON OH 44701-4410



0083783820087973010100000000000348736861901062106031900009

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Return top portion with your payment

Service Address:  
**RIVERSIDE GENERATING COMPANY LLC**  
HIGHWAY 23  
CATLETTSBURG, KY 41129-9802

Rate Tariff: Industrial Gnl Service-360

Page 1 of 2

Account Number	Total Amount Due	Due Date
[REDACTED]	\$83,783.82	Jun 19, 2017
Meter Number	Cycle-Route	Bill Date
Lt1201a004	31-97	Jun 1, 2017

Questions About Bill or Service, Call:  
1-888-710-4237  
Pay By Phone: 1-800-611-0964

**KPCO Messages**

To avoid unnecessary delays in crediting your electric payment, please **do not paper clip or staple your check to the bill payment stub.**

\*If you pay your electric bill in person, remember to pay only at **AUTHORIZED** pay stations. These locations send notice of your payment immediately to **Kentucky Power** which could prevent service disconnection. Pay stations may charge a fee for this service. Keep your receipt as proof of payment. For a list of authorized pay stations or other payment options, visit our website at [www.kentuckypower.com](http://www.kentuckypower.com) or call the number above.\*\*

**Make this the last bill sent in the mail.** Gain more security and trust and Go Paperless to get an email notification when your bill is ready. Today is the Day! AEPPaperless.com.

Visit us at [www.KentuckyPower.com](http://www.KentuckyPower.com)  
Rates available on request  
See other side for Important Information

**Previous Charges:**

Total Amount Due At Last Billing \$ 81,453.40  
Payment 05/17/17 - Thank You -81,453.40  
**Previous Balance Due** \$ .00

**Current KPCO Charges:**

**Tariff 360 - Industrial Gnl Service** 05/31/17  
Rate Billing \$ 63,400.84  
Fuel Adj @ 0.0020805 Per KWH 1,647.76  
Kentucky Economic Development Surcharge .15  
Capacity Charge @ 0.0007320 Per KWH 579.74  
Big Sandy 1 Operation Rider @ 0.0014100 Per KWH 1,116.72  
Big Sandy 1 Operation Rider @ \$1.1400000 Per KW 4,149.60  
Purchased Power Adj 0.5915000% 419.34  
Big Sandy Retirement Rider 5.4339000% 2,664.55  
Environmental Adj 15.0193000% 7,364.81  
School Tax 2,440.31  
**Current Electric Charges Due** \$ 83,783.82

**Total Amount Due** **\$83,783.82**  
**Due Jun 19 , Add \$4,189.19 After This Date**

Meter Number	Service Period		Meter Reading Detail			
	From	To	Previous	Code	Current	Code
LT1204A035	04/30	05/31	23764	Actual	24235	Actual
Multiplier	1,000.0000		Metered Usage 471,000 KWH			
LT1201A004	04/30	05/31	15503	Actual	15824	Actual
Multiplier	1,000.0000		Metered Usage 321,000 KWH			
LT1204A035	04/30	05/31	0.000	Actual	1.760	Actual
Multiplier	1,000.0000		Metered Usage 1,760.000 KW Off-Pk			
LT1204A035	04/30	05/31	0.000	Actual	2.352	Actual
Multiplier	1,000.0000		Metered Usage 2,352.000 KW On-Pk			
LT1201A004	04/30	05/31	0.000	Actual	0.444	Actual
Multiplier	1,000.0000		Metered Usage 444.000 KW Off-Pk			
LT1201A004	04/30	05/31	0.000	Actual	1.288	Actual
Multiplier	1,000.0000		Metered Usage 1,288.000 KW On-Pk			
LT1204A035	04/30	05/31	0.000	Actual	1.956	Actual
Multiplier	1,000.0000		Metered Usage 1,956.000 KVAR			



Send Inquiries To:  
**PO BOX 24401**  
**CANTON, OH 44701-4401**  
**R-03-LT1201A004**  
 2393-1

Rate Tariff: Industrial Gnl Service-360

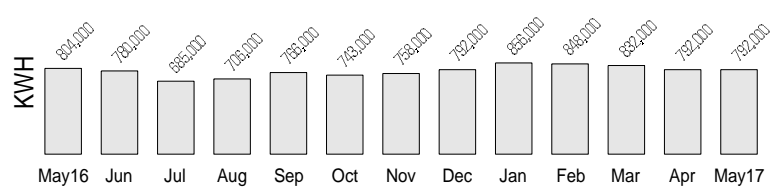
Account Number	Total Amount Due	Due Date
██████████	\$83,783.82	Jun 19, 2017
Meter Number	Cycle-Route	Bill Date
Lt1201a004	31-97	Jun 1, 2017

Service Address:  
**RIVERSIDE GENERATING COMPANY**  
**LLC**  
**HIGHWAY 23**  
**CATLETTSBURG, KY 41129-9802**

Meter Number	Service Period	Meter Reading Detail				
Number	From	To	Previous	Code	Current	Code
LT1201A004	04/30	05/31	0.000	Actual	0.000	Actual
Multiplier	1,000.0000		Metered Usage 0.000 KVAR			

Next scheduled read date should be between Jun 29 and Jul 5

**13 Month Usage History**      **Total KWH for Past 12 Months is 9,362,000**



Month	Total KWH	Days	KWH Per Day	Cost Per Day	Average Temperature
Current	792,000	31	25,548	\$2,702.70	64°F
Previous	792,000	30	26,400	\$2,715.11	62°F
One Year Ago	804,000	31	25,935	\$2,349.55	63°F

Your Average Monthly Usage: 780,167 KWH

Contract Capacity = 3,100.0	High Prev Demand = 5,480.0 On-Pk
	High Prev Demand = 5,480.0 Off-Pk

**Additional Messages**



Account Number

[REDACTED]

CY 31

10417998

**\$104,179.98**

Total Amount Due

\$ \_\_\_\_\_

Amount Enclosed

**Due Jul 21 , Add \$5,209.00 After This Date**

Send Inquiries To:  
PO BOX 24401  
CANTON, OH 44701-4401  
R-03-LT1201A004

3915-1  
030003915 01 AV 0.37



RIVERSIDE GENERATING COMPANY LLC  
RIVERSIDE/FOOTHILLS GENERATING CO  
25038 HIGHWAY 23  
CATLETTSBURG, KY 41129-8635

Make Check Payable and Send To:  
**KENTUCKY POWER COMPANY**  
PO BOX 24410  
CANTON OH 44701-4410



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Return top portion with your payment

Service Address:  
RIVERSIDE GENERATING COMPANY  
LLC  
HIGHWAY 23  
CATLETTSBURG, KY 41129-9802

Rate Tariff: Industrial Gnl Service-360

Page 1 of 2

Account Number	Total Amount Due	Due Date
[REDACTED]	\$104,179.98	Jul 21, 2017
Meter Number	Cycle-Route	Bill Date
Lt1201a004	31-97	Jul 5, 2017

**Previous Charges:**

Total Amount Due At Last Billing	\$	83,783.82
Payment 06/20/17 - Thank You		-83,783.82
<b>Previous Balance Due</b>	\$	.00

**Current KPCO Charges:**

<b>Tariff 360 - Industrial Gnl Service</b>	06/30/17	
Rate Billing	\$	77,298.92
Fuel Adj @ 0.0025233 Per KWH		1,985.84
Kentucky Economic Development Surcharge		.15
Capacity Charge @ 0.0007320 Per KWH		576.08
Big Sandy 1 Operation Rider @ 0.0014100 Per KWH		1,109.67
Big Sandy 1 Operation Rider @ \$1.1400000 Per KW		5,914.32
Purchased Power Adj 0.4230000%		367.52
Big Sandy Retirement Rider 5.4339000%		3,534.95
Environmental Adj 15.9225000%		10,358.16
School Tax		3,034.37
<b>Current Electric Charges Due</b>	\$	104,179.98

**Total Amount Due \$104,179.98**

**Due Jul 21 , Add \$5,209.00 After This Date**

Questions About Bill or Service, Call:  
1-888-710-4237  
Pay By Phone: 1-800-611-0964

**KPCO Messages**

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Rates available on request  
See other side for Important Information

Meter Number	Service Period		Meter Reading Detail			
	From	To	Previous	Code	Current	Code
LT1204A035	05/31	06/30	24235	Actual	24702	Actual
Multiplier	1,000.0000		Metered Usage 467,000 KWH			
LT1201A004	05/31	06/30	15824	Actual	16144	Actual
Multiplier	1,000.0000		Metered Usage 320,000 KWH			
LT1204A035	05/31	06/30	0.000	Actual	0.772	Actual
Multiplier	1,000.0000		Metered Usage 772.000 KW Off-Pk			
LT1204A035	05/31	06/30	0.000	Actual	2.632	Actual
Multiplier	1,000.0000		Metered Usage 2,632.000 KW On-Pk			
LT1201A004	05/31	06/30	0.000	Actual	0.520	Actual
Multiplier	1,000.0000		Metered Usage 520.000 KW Off-Pk			
LT1201A004	05/31	06/30	0.000	Actual	2.556	Actual
Multiplier	1,000.0000		Metered Usage 2,556.000 KW On-Pk			
LT1204A035	05/31	06/30	0.000	Actual	1.772	Actual
Multiplier	1,000.0000		Metered Usage 1,772.000 KVAR			



Rate Tariff: Industrial Gnl Service-360

Send Inquiries To:  
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CANTON, OH 44701-4401  
R-03-LT1201A004

3915-1

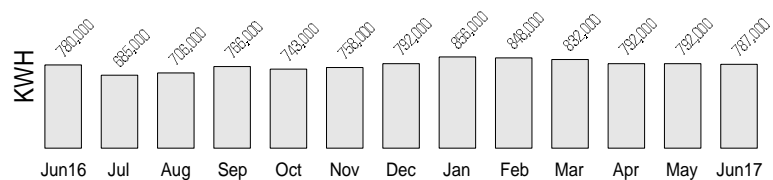
Service Address:  
RIVERSIDE GENERATING COMPANY  
LLC  
HIGHWAY 23  
CATLETTSBURG, KY 41129-9802

Account Number	Total Amount Due	Due Date
[REDACTED]	\$104,179.98	Jul 21, 2017
Meter Number	Cycle-Route	Bill Date
Lt1201a004	31-97	Jul 5, 2017

Meter Number	Service Period	Meter Reading Detail				
Number	From	To	Previous	Code	Current	Code
LT1201A004	05/31	06/30	0.000	Actual	0.000	Actual
Multiplier	1,000.0000		Metered Usage		0.000 KVAR	

Next scheduled read date should be between Jul 28 and Aug 2

**13 Month Usage History**      **Total KWH for Past 12 Months is 9,350,000**



Month	Total KWH	Days	KWH Per Day	Cost Per Day	Average Temperature
Current	787,000	30	26,233	\$3,472.67	71°F
Previous	792,000	31	25,548	\$2,702.70	64°F
One Year Ago	780,000	30	26,000	\$2,353.25	73°F

Your Average Monthly Usage: 779,167 KWH

Contract Capacity = 3,100.0	High Prev Demand = 5,480.0 On-Pk
	High Prev Demand = 5,480.0 Off-Pk

**Additional Messages**





Account Number

[REDACTED]

CY 31

9083691

**\$200,225.89**

Total Amount Due

\$ \_\_\_\_\_

Amount Enclosed

**Due Aug 17 , Add \$4,541.85 After This Date**

Send Inquiries To:  
PO BOX 24401  
CANTON, OH 44701-4401  
R-03-LT1201A004

2518-1  
030002518 01 AV 0.37



RIVERSIDE GENERATING COMPANY LLC  
RIVERSIDE/FOOTHILLS GENERATING CO  
25038 HIGHWAY 23  
CATLETTSBURG, KY 41129-8635

Make Check Payable and Send To:  
**KENTUCKY POWER COMPANY**  
PO BOX 24410  
CANTON OH 44701-4410



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Service Address:  
**RIVERSIDE GENERATING COMPANY LLC**  
HIGHWAY 23  
CATLETTSBURG, KY 41129-9802

Rate Tariff: Industrial Gnl Service-360

Page 1 of 2

Account Number	Total Amount Due	Due Date
[REDACTED]	\$200,225.89	Aug 17, 2017
Meter Number	Cycle-Route	Bill Date
Lt1201a004	31-97	Aug 1, 2017

**Previous Charges:**

Total Amount Due At Last Billing	\$	104,179.98
Late Payment Charge		5,209.00
<b>Previous Balance Due</b>	\$	<b>109,388.98</b>

**Current KPCO Charges:**

<b>Tariff 360 - Industrial Gnl Service</b>	07/31/17	
Rate Billing	\$	70,164.48
Fuel Adj @ 0.0035913- Per KWH		-2,815.58
Kentucky Economic Development Surcharge		.15
Capacity Charge @ 0.0007320 Per KWH		573.89
Big Sandy 1 Operation Rider @ 0.0014100 Per KWH		1,105.44
Big Sandy 1 Operation Rider @ \$1.1400000 Per KW		5,075.28
Purchased Power Adj 0.2675000%		198.23
Big Sandy Retirement Rider 5.4339000%		3,083.94
Environmental Adj 19.0390000%		10,805.34
School Tax		2,645.74
<b>Current Electric Charges Due</b>	\$	<b>90,836.91</b>

**Total Amount Due \$200,225.89**

**Due Aug 17 , Add \$4,541.85 After This Date**

Questions About Bill or Service, Call:  
1-888-710-4237  
Pay By Phone: 1-800-611-0964

**KPCO Messages**

**DEPOSIT WARNING: An additional deposit may be billed to your account**, if all of the above amounts are not paid by the date specified on this statement. Any future late payments may result in this additional charge. This deposit would be billed in three installments.

Register for online services at [www.KentuckyPower.com](http://www.KentuckyPower.com). Registration is **free and easy** and gives you the convenience of 24-hour access to your account. You can sign up for paperless billing, view your bill, check your usage, update your contact information, and much more.

**Make your life easier.** You can write one check for multiple electric accounts!

**Make this the last bill sent in the mail.** Gain more security and trust and Go Paperless to get an email notification when your bill is ready. Today is the Day! AEP Paperless.com.

Visit us at [www.KentuckyPower.com](http://www.KentuckyPower.com)  
Rates available on request  
See other side for Important Information

Meter Number	Service Period	Meter Reading Detail				
Number	From	To	Previous	Code	Current	Code
LT1204A035	06/30	07/31	24702	Actual	25165	Actual
Multiplier	1,000.0000		Metered Usage 463,000 KWH			
LT1201A004	06/30	07/31	16144	Actual	16465	Actual
Multiplier	1,000.0000		Metered Usage 321,000 KWH			
LT1204A035	06/30	07/31	0.000	Actual	0.832	Actual
Multiplier	1,000.0000		Metered Usage 832.000 KW Off-Pk			
LT1204A035	06/30	07/31	0.000	Actual	2.796	Actual
Multiplier	1,000.0000		Metered Usage 2,796.000 KW On-Pk			
LT1201A004	06/30	07/31	0.000	Actual	0.588	Actual
Multiplier	1,000.0000		Metered Usage 588.000 KW Off-Pk			
LT1201A004	06/30	07/31	0.000	Actual	1.656	Actual
Multiplier	1,000.0000		Metered Usage 1,656.000 KW On-Pk			
LT1204A035	06/30	07/31	0.000	Actual	1.772	Actual
Multiplier	1,000.0000		Metered Usage 1,772.000 KVAR			



Rate Tariff: Industrial Gnl Service-360

Send Inquiries To:  
PO BOX 24401  
CANTON, OH 44701-4401  
R-03-LT1201A004

2518-1

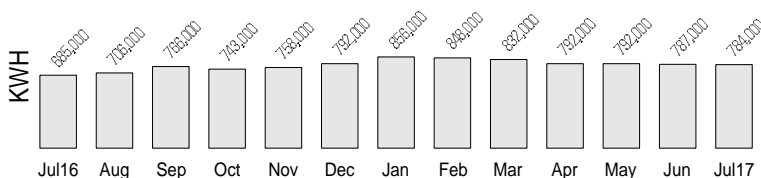
Service Address:  
RIVERSIDE GENERATING COMPANY  
LLC  
HIGHWAY 23  
CATLETTSBURG, KY 41129-9802

Account Number	Total Amount Due	Due Date
[REDACTED]	\$200,225.89	Aug 17, 2017
Meter Number	Cycle-Route	Bill Date
Lt1201a004	31-97	Aug 1, 2017

Meter Number	Service Period	Meter Reading Detail				
Number	From	To	Previous	Code	Current	Code
LT1201A004	06/30	07/31	0.000	Actual	0.000	Actual
Multiplier	1,000.0000		Metered Usage		0.000 KVAR	

Next scheduled read date should be between Aug 30 and Sep 5

**13 Month Usage History**      **Total KWH for Past 12 Months is 9,357,000**



Month	Total KWH	Days	KWH Per Day	Cost Per Day	Average Temperature
Current	784,000	31	25,290	\$2,930.22	75°F
Previous	787,000	30	26,233	\$3,472.67	71°F
One Year Ago	685,000	31	22,097	\$2,159.46	76°F

Your Average Monthly Usage: 779,750 KWH

Contract Capacity = 3,100.0	High Prev Demand = 5,480.0 On-Pk
	High Prev Demand = 5,480.0 Off-Pk

**Additional Messages**



A unit of American Electric Power



Account Number

[REDACTED]

CY 31

8994224

<b>\$89,942.24</b>	\$ _____
Total Amount Due	Amount Enclosed
<b>Due Sep 21 , Add \$4,497.11 After This Date</b>	

Send Inquiries To:  
PO BOX 24401  
CANTON, OH 44701-4401  
R-03-LT1201A004

5434-1  
030005434 01 AB 0.40



RIVERSIDE GENERATING COMPANY LLC  
RIVERSIDE/FOOTHILLS GENERATING CO  
25038 HIGHWAY 23  
CATLETTSBURG, KY 41129-8635

Make Check Payable and Send To:  
**KENTUCKY POWER COMPANY**  
PO BOX 24410  
CANTON OH 44701-4410



0089942240094439350100000000000348736861905092309031900002

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Return top portion with your payment

Service Address:  
RIVERSIDE GENERATING COMPANY  
LLC  
HIGHWAY 23  
CATLETTSBURG, KY 41129-9802

Rate Tariff: Industrial Gnl Service-360

Page 1 of 2

Account Number	Total Amount Due	Due Date
[REDACTED]	\$89,942.24	Sep 21, 2017
Meter Number	Cycle-Route	Bill Date
Lt1201a004	31-97	Sep 5, 2017

**Previous Charges:**

Total Amount Due At Last Billing	\$ 200,225.89
Payment 08/03/17 - Thank You	-109,388.98
Payment 08/17/17 - Thank You	-90,836.91
	.00

**Previous Balance Due**

\$ .00

**Current KPCO Charges:**

**Tariff 360 - Industrial Gnl Service 08/31/17**

Rate Billing	\$ 71,251.36
Fuel Adj @ 0.0002508 Per KWH	204.65
Kentucky Economic Development Surcharge	.15
Capacity Charge @ 0.0007490 Per KWH	611.18
Big Sandy 1 Operation Rider @ 0.0001900 Per KWH	155.04
Big Sandy 1 Operation Rider @ \$0.9600000 Per KW	4,197.12
Purchased Power Adj 0.0967000%	73.90
Big Sandy Retirement Rider 5.4339000%	2,979.31
Environmental Adj 14.3172000%	7,849.85
School Tax	2,619.68

**Current Electric Charges Due**

\$ 89,942.24

**Total Amount Due \$89,942.24**

**Due Sep 21 , Add \$4,497.11 After This Date**

Meter Number	Service Period		Meter Reading Detail			
	From	To	Previous	Code	Current	Code
LT1204A035	07/31	08/31	25165	Actual	25640	Actual
Multiplier	1,000.0000		Metered Usage 475,000 KWH			
LT1201A004	07/31	08/31	16465	Actual	16806	Actual
Multiplier	1,000.0000		Metered Usage 341,000 KWH			
LT1204A035	07/31	08/31	0.000	Actual	0.736	Actual
Multiplier	1,000.0000		Metered Usage 736.000 KW Off-Pk			
LT1204A035	07/31	08/31	0.000	Actual	3.704	Actual
Multiplier	1,000.0000		Metered Usage 3,704.000 KW On-Pk			
LT1201A004	07/31	08/31	0.000	Actual	1.540	Actual
Multiplier	1,000.0000		Metered Usage 1,540.000 KW Off-Pk			
LT1201A004	07/31	08/31	0.000	Actual	0.668	Actual
Multiplier	1,000.0000		Metered Usage 668.000 KW On-Pk			

Questions About Bill or Service, Call:  
1-888-710-4237  
Pay By Phone: 1-800-611-0964

**KPCO Messages**

**Make this the last bill sent in the mail.** Gain more security and trust and Go Paperless to get an email notification when your bill is ready. Today is the Day! AEP Paperless.com.

Visit us at [www.KentuckyPower.com](http://www.KentuckyPower.com)  
Rates available on request  
See other side for Important Information



Rate Tariff: Industrial Gnl Service-360

Send Inquiries To:  
PO BOX 24401  
CANTON, OH 44701-4401  
R-03-LT1201A004  
  
5434-1

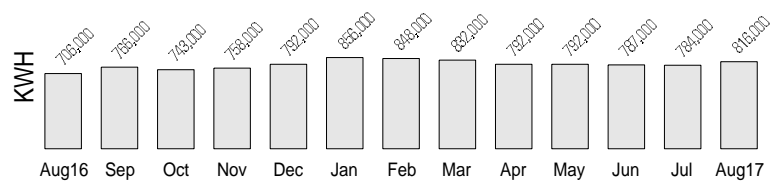
Service Address:  
RIVERSIDE GENERATING COMPANY  
LLC  
HIGHWAY 23  
CATLETTSBURG, KY 41129-9802

Account Number	Total Amount Due	Due Date
██████████	\$89,942.24	Sep 21, 2017
Meter Number	Cycle-Route	Bill Date
Lt1201a004	31-97	Sep 5, 2017

Meter Number	Service Period	Meter Reading Detail				
Number	From	To	Previous	Code	Current	Code
LT1204A035	07/31	08/31	0.000	Actual	1.768	Actual
Multiplier	1,000.0000		Metered Usage 1,768.000 KVAR			
LT1201A004	07/31	08/31	0.000	Actual	0.000	Actual
Multiplier	1,000.0000		Metered Usage 0.000 KVAR			

Next scheduled read date should be between Sep 29 and Oct 4

**13 Month Usage History**      **Total KWH for Past 12 Months is 9,456,000**



Month	Total KWH	Days	KWH Per Day	Cost Per Day	Average Temperature
Current	816,000	31	26,323	\$2,901.36	72°F
Previous	784,000	31	25,290	\$2,930.22	75°F
One Year Ago	706,000	32	22,063	\$3,273.51	77°F

Your Average Monthly Usage: 788,000 KWH

Contract Capacity = 3,100.0	High Prev Demand = 5,480.0 On-Pk
	High Prev Demand = 5,480.0 Off-Pk

**Additional Messages**



**Account Number**  
CY 31  
9777461

<b>\$97,774.61</b>	\$ _____
Total Amount Due	Amount Enclosed
<b>Due Oct 18 , Add \$4,888.73 After This Date</b>	

Send Inquiries To:  
PO BOX 24401  
CANTON, OH 44701-4401  
R-03-LT1201A004

5485-1  
030005485 01 SP 0.46

**RIVERSIDE GENERATING COMPANY LLC**  
RIVERSIDE/FOOTHILLS GENERATING CO  
25038 HIGHWAY 23  
CATLETTSBURG, KY 41129-8635

Make Check Payable and Send To:  
**KENTUCKY POWER COMPANY**  
PO BOX 24410  
CANTON OH 44701-4410

0097774610102663340100000000000348736861902102010031900001

Please tear on dotted line

Return top portion with your payment 36

Service Address:  
**RIVERSIDE GENERATING COMPANY LLC**  
HIGHWAY 23  
CATLETTSBURG, KY 41129-9802

Rate Tariff: Industrial Gnl Service-360

Page 1 of 2

<b>Account Number</b>	<b>Total Amount Due</b>	<b>Due Date</b>
[REDACTED]	\$97,774.61	Oct 18, 2017
<b>Meter Number</b>	<b>Cycle-Route</b>	<b>Bill Date</b>
Lt1201a004	31-97	Oct 2, 2017

Questions About Bill or Service, Call:  
1-888-710-4237  
Pay By Phone: 1-800-611-0964

**KPCO Messages**

Make this the last bill sent in the mail. Gain more security and trust and Go Paperless to get an email notification when your bill is ready. Today is the Day! AEPPaperless.com.

Visit us at [www.KentuckyPower.com](http://www.KentuckyPower.com)  
Rates available on request  
See other side for Important Information



**Previous Charges:**  
Total Amount Due At Last Billing \$ 89,942.24  
Payment 09/22/17 - Thank You -89,942.24  
**Previous Balance Due** \$ .00

**Current KPCO Charges:**  
**Tariff 360 - Industrial Gnl Service 09/30/17**

Rate Billing	\$ 75,900.96
Fuel Adj @ 0.0029429 Per KWH	2,195.40
Kentucky Economic Development Surcharge	.15
Capacity Charge @ 0.0007490 Per KWH	558.75
Big Sandy 1 Operation Rider @ 0.0001900 Per KWH	141.74
Big Sandy 1 Operation Rider @ \$0.9600000 Per KW	4,711.68
Purchased Power Adj 0.0928000%	77.50
Big Sandy Retirement Rider 5.4339000%	3,294.11
Environmental Adj 13.2734000%	8,046.52
School Tax	2,847.80
<b>Current Electric Charges Due</b>	<b>\$ 97,774.61</b>

**Total Amount Due \$97,774.61**  
**Due Oct 18 , Add \$4,888.73 After This Date**

Meter Number	Service Period		Meter Reading Detail			
	From	To	Previous	Code	Current	Code
LT1204A035	08/31	09/30	25640	Actual	26074	Actual
Multiplier	1,000.0000		Metered Usage 434,000 KWH			
LT1201A004	08/31	09/30	16806	Actual	17118	Actual
Multiplier	1,000.0000		Metered Usage 312,000 KWH			
LT1204A035	08/31	09/30	0.000	Actual	2.892	Actual
Multiplier	1,000.0000		Metered Usage 2,892.000 KW On-Pk			
LT1204A035	08/31	09/30	0.000	Actual	1.520	Actual
Multiplier	1,000.0000		Metered Usage 1,520.000 KW Off-Pk			
LT1201A004	08/31	09/30	0.000	Actual	2.016	Actual
Multiplier	1,000.0000		Metered Usage 2,016.000 KW On-Pk			
LT1201A004	08/31	09/30	0.000	Actual	2.256	Actual
Multiplier	1,000.0000		Metered Usage 2,256.000 KW Off-Pk			
LT1204A035	08/31	09/30	0.000	Actual	1.788	Actual
Multiplier	1,000.0000		Metered Usage 1,788.000 KVAR			

Rate Tariff: Industrial Gnl Service-360

Page 2 of 2

Send Inquiries To:  
PO BOX 24401  
CANTON, OH 44701-4401  
R-03-LT1201A004

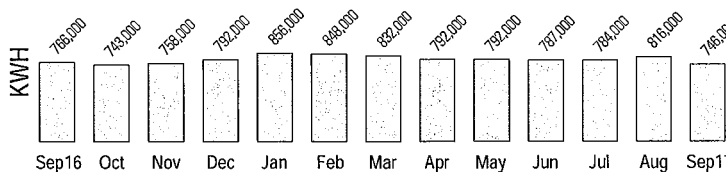
5485-1

Service Address:  
RIVERSIDE GENERATING COMPANY  
LLC  
HIGHWAY 23  
CATLETTSBURG, KY 41129-9802

<b>Account Number</b>	<b>Total Amount Due</b>	<b>Due Date</b>
██████████	\$97,774.61	Oct 18, 2017
<b>Meter Number</b>	<b>Cycle-Route</b>	<b>Bill Date</b>
LT1201a004	31-97	Oct 2, 2017

Meter	Service Period		Meter Reading Detail			
Number	From	To	Previous	Code	Current	Code
LT1201A004	08/31	09/30	0.000	Actual	0.000	Actual
Multiplier 1,000.0000		Metered Usage 0.000 KVAR				
Next scheduled read date should be between Oct 30 and Nov 2						

13 Month Usage History      Total KWH for Past 12 Months is 9,566,000



Month	Total KWH	Days	KWH Per Day	Cost Per Day	Average Temperature
Current	746,000	30	24,867	\$3,259.15	67°F
Previous	816,000	31	26,323	\$2,901.36	72°F
One Year Ago	766,000	29	26,414	\$2,624.65	72°F
Your Average Monthly Usage: 797,167 KWH					

Contract Capacity = 3,100.0	High Prev Demand = 5,480.0 On-Pk
	High Prev Demand = 5,480.0 Off-Pk

**Additional Messages**

BATCH DATE: \_\_\_\_\_  
 BATCH #: LS power  
 DOC REF #: \_\_\_\_\_  
 ACCT #: K1067 / 655000

**APPROVED FOR PAYMENT**  
  
 RIVERSIDE - PLANT MANAGER



Account Number

[REDACTED]

CY 31

8206933

<b>\$82,069.33</b>	\$ _____
Total Amount Due	Amount Enclosed
<b>Due Nov 17 , Add \$4,103.47 After This Date</b>	

Send Inquiries To:  
PO BOX 24401  
CANTON, OH 44701-4401  
R-03-LT1201A004

4654-1  
030004654 01 AV 0.37



RIVERSIDE GENERATING COMPANY LLC  
RIVERSIDE/FOOTHILLS GENERATING CO  
25038 HIGHWAY 23  
CATLETTSBURG, KY 41129-8635

Make Check Payable and Send To:  
**KENTUCKY POWER COMPANY**  
PO BOX 24410  
CANTON OH 44701-4410



0082069330086172800100000000000348736861901111911031900007

Please tear on dotted line

Return top portion with your payment

Service Address:  
**RIVERSIDE GENERATING COMPANY LLC**  
HIGHWAY 23  
CATLETTSBURG, KY 41129-9802

Rate Tariff: Industrial Gnl Service-360

Page 1 of 2

Account Number	Total Amount Due	Due Date
[REDACTED]	\$82,069.33	Nov 17, 2017
Meter Number	Cycle-Route	Bill Date
Lt1201a004	31-97	Nov 1, 2017

**Previous Charges:**

Total Amount Due At Last Billing	\$ 97,774.61
Payment 10/13/17 - Thank You	-97,774.61
<b>Previous Balance Due</b>	<b>\$ .00</b>

**Current KPCO Charges:**

<b>Tariff 360 - Industrial Gnl Service</b> 10/31/17	
Rate Billing	\$ 65,527.90
Fuel Adj @ 0.0000202- Per KWH	-16.89
Kentucky Economic Development Surcharge	.15
Capacity Charge @ 0.0007490 Per KWH	626.16
Big Sandy 1 Operation Rider @ 0.0001900 Per KWH	158.84
Big Sandy 1 Operation Rider @ \$0.9600000 Per KW	3,576.96
Purchased Power Adj 0.1179000%	82.38
Big Sandy Retirement Rider 6.4263000%	3,012.31
Environmental Adj 14.3172000%	6,711.15
School Tax	2,390.37
<b>Current Electric Charges Due</b>	<b>\$ 82,069.33</b>

**Total Amount Due \$82,069.33**

**Due Nov 17 , Add \$4,103.47 After This Date**

Questions About Bill or Service, Call:  
1-888-710-4237  
Pay By Phone: 1-800-611-0964

**KPCO Messages**

Register for online services at [www.KentuckyPower.com](http://www.KentuckyPower.com). Registration is **free and easy** and gives you the convenience of 24-hour access to your account. You can sign up for paperless billing, view your bill, check your usage, update your contact information, and much more.

**Make this the last bill sent in the mail.** Gain more security and trust and Go Paperless to get an email notification when your bill is ready. Today is the Day! AEP Paperless.com.

Visit us at [www.KentuckyPower.com](http://www.KentuckyPower.com)  
Rates available on request  
See other side for Important Information

Meter Number	Service Period		Meter Reading Detail			
	From	To	Previous	Code	Current	Code
LT1204A035	09/30	10/31	26074	Actual	26572	Actual
Multiplier	1,000.0000		Metered Usage 498,000 KWH			
LT1201A004	09/30	10/31	17118	Actual	17456	Actual
Multiplier	1,000.0000		Metered Usage 338,000 KWH			
LT1204A035	09/30	10/31	0.000	Actual	1.376	Actual
Multiplier	1,000.0000		Metered Usage 1,376.000 KW Off-Pk			
LT1204A035	09/30	10/31	0.000	Actual	2.246	Actual
Multiplier	1,000.0000		Metered Usage 2,246.000 KW On-Pk			
LT1201A004	09/30	10/31	0.000	Actual	0.866	Actual
Multiplier	1,000.0000		Metered Usage 866.000 KW Off-Pk			
LT1201A004	09/30	10/31	0.000	Actual	1.480	Actual
Multiplier	1,000.0000		Metered Usage 1,480.000 KW On-Pk			
LT1204A035	09/30	10/31	0.000	Actual	1.772	Actual
Multiplier	1,000.0000		Metered Usage 1,772.000 KVAR			



Rate Tariff: Industrial Gnl Service-360

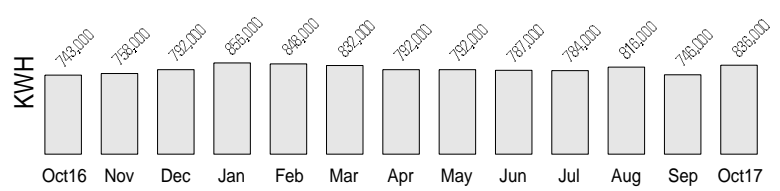
Send Inquiries To:  
PO BOX 24401  
CANTON, OH 44701-4401  
R-03-LT1201A004  
4654-1

Service Address:  
RIVERSIDE GENERATING COMPANY  
LLC  
HIGHWAY 23  
CATLETTSBURG, KY 41129-9802

Account Number	Total Amount Due	Due Date
[REDACTED]	\$82,069.33	Nov 17, 2017
Meter Number	Cycle-Route	Bill Date
Lt1201a004	31-97	Nov 1, 2017

Meter Number	Service Period	Meter Reading Detail				
Number	From	To	Previous	Code	Current	Code
LT1201A004	09/30	10/31	0.000	Actual	0.000	Actual
Multiplier	1,000.0000		Metered Usage		0.000 KVAR	
Next scheduled read date should be between Nov 29 and Dec 4						

**13 Month Usage History**      **Total KWH for Past 12 Months is 9,546,000**



Month	Total KWH	Days	KWH Per Day	Cost Per Day	Average Temperature
Current	836,000	31	26,968	\$2,647.40	59°F
Previous	746,000	30	24,867	\$3,259.15	67°F
One Year Ago	743,000	31	23,968	\$2,513.12	62°F
Your Average Monthly Usage: 795,500 KWH					

Contract Capacity = 3,100.0	High Prev Demand = 5,188.0 On-Pk
	High Prev Demand = 5,188.0 Off-Pk

**Additional Messages**





PO BOX 24401  
CANTON, OH 44701-4401

Amount due on or before  
December 20, 2017 **\$128,565.77**

Bill mailing date is Dec 4, 2017  
Account # [REDACTED]

SERVICE ADDRESS: RIVERSIDE GENERATING COMPANY LLC, HIGHWAY 23, CATLETTSBURG, KY 41129-9802  
4457

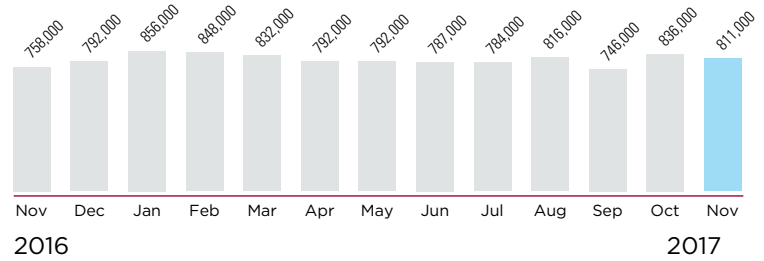
CY 31

### Notes from KPCO:

**Thank you for being a paperless customer!** Sign up for billing and outage alerts to stay informed. You can manage your account by logging in at kentuckypower.com.

RIVERSIDE GENERATING COMPANY LLC  
25038 HIGHWAY 23  
# 23  
CATLETTSBURG, KY 41129-8635

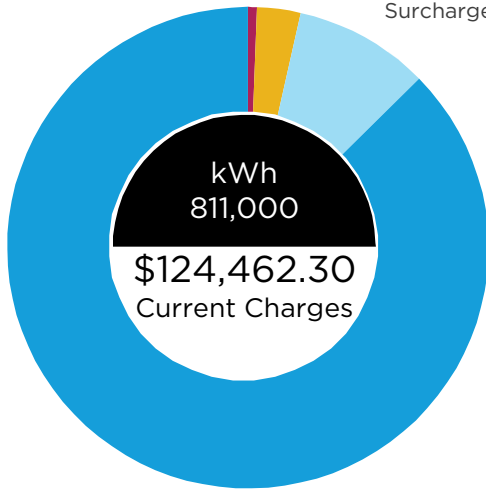
### Usage History (kWh):



### Current bill summary:

Billing from 11/01/17 - 11/30/17 (30 days)

Fuel Adj \$755.04  
Taxes & Fees \$3,625.12  
Environmental  
Surcharge \$11,291.41



Electric Service  
\$108,790.73

### Methods of Payment

- kentuckypower.com
- PO Box 24410  
Canton OH 44701-4410
- 1-800-611-0964 (\$2.95 fee)

### Need to get in touch?

Customer Operations Center: 1-888-710-4237

Turn over for important information! ➤

Thank you for your prompt payment. Please include your account number on your check and return this stub with your payment.

RIVERSIDE GENERATING COMPANY LLC, HIGHWAY 23, CATLETTSBURG, KY 41129-9802



Send Inquiries To:  
PO BOX 24401  
CANTON, OH 44701-4401

12446230  
Account # [REDACTED]

Amount due on or before  
December 20, 2017 **\$128,565.77**

Payment Amount \$

Pay \$134,788.89 after 12/20/2017

Make check payable and send to:  
KENTUCKY POWER COMPANY  
PO BOX 24410  
CANTON OH 44701-4410



012856577013478889010000000000348736861904122212031900002



**Service Address:**

RIVERSIDE GENERATING COMPANY LLC  
HIGHWAY 23  
CATLETTSBURG, KY 41129-9802

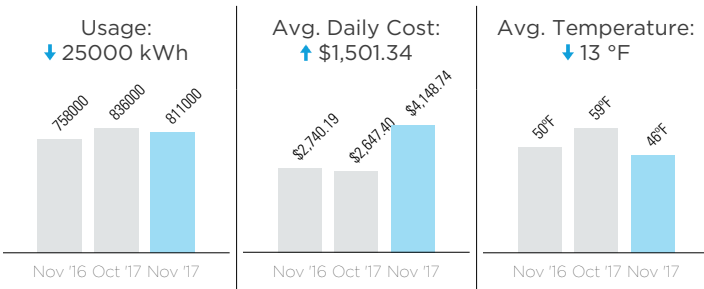
Account # [REDACTED]

**Line Item Charges:**

Previous Charges	
Total Amount Due At Last Billing	\$ 82,069.33
Payment 11/21/17 - Thank You	-82,069.33
Late Payment Charge	4,103.47
<b>Previous Balance Due</b>	<b>\$ 4,103.47</b>
Current KPCO Charges	
<b>Tariff 360 - Industrial Gnl Service 11/30/17</b>	
Rate Billing	\$ 96,418.08
Fuel Adj @ 0.0009310 Per kWh	755.04
Kentucky Economic Development Surcharge	.15
Capacity Charge @ 0.0007490 Per kWh	607.44
Big Sandy 1 Operation Rider @ 0.0001900 Per kWh	154.09
Big Sandy 1 Operation Rider @ \$0.9600000 Per kW	6,259.20
Purchased Power Adj 0.1176000%	122.53
Big Sandy Retirement Rider 6.4263000%	5,229.24
Environmental Adj 13.8762000%	11,291.41
School Tax	3,625.12
<b>Current Balance Due</b>	<b>\$ 124,462.30</b>
<b>Total Balance Due</b>	<b>\$ 128,565.77</b>
Pay \$134,788.89 after 12/20/2017	

**Usage Details:**

↑↓Values reflect changes between current month and previous month.



Total usage for the past 12 months: 9,639,000 kWh

Average (Avg.) monthly usage: 803,250 kWh

Contract Capacity = 3,100.0	High Prev Demand = 5,188.0 On-Pk
	High Prev Demand = 5,188.0 Off-Pk

**Meter Read Details:**

Meter #LT1204A035					
Previous	Type	Current	Type	Metered	Usage
26572	Actual	27005	Actual	433	433,000 kWh
-	-	3.852	Actual	3.852	3852 kW Off-Pk
-	-	3.956	Actual	3.956	3956 kW On-Pk
-	-	1.952	Actual	1.952	1952 kVAR
Service Period 10/31 - 11/30				Multiplier 1000	
Meter #LT1201A004					
Previous	Type	Current	Type	Metered	Usage
17456	Actual	17834	Actual	378	378,000 kWh
-	-	2.632	Actual	2.632	2632 kW Off-Pk
-	-	2.564	Actual	2.564	2564 kW On-Pk
-	-	0.000	Actual	0	0 kVAR
Service Period 10/31 - 11/30				Multiplier 1000	
Next scheduled read date should be between Dec 29 and Jan 4 .					

**Notes from KPCO:**

Due date does not apply to previous balance due.

To avoid unnecessary delays in crediting your electric payment, please **do not paper clip or staple your check to the bill payment stub.**

\*If you pay your electric bill in person, remember to pay only at **AUTHORIZED** pay stations. These locations send notice of your payment immediately to **Kentucky Power** which could prevent service disconnection. Pay stations may charge a fee for this service. Keep your receipt as proof of payment. For a list of authorized pay stations or other payment options, visit our website at [www.kentuckypower.com](http://www.kentuckypower.com) or call the number above.\*\*



PO BOX 24401  
CANTON, OH 44701-4401

Amount due on or before  
January 18, 2018 **\$81,582.59**

Bill mailing date is Jan 2, 2018  
Account # [REDACTED]

SERVICE ADDRESS: RIVERSIDE GENERATING COMPANY LLC, HIGHWAY 23, CATLETTSBURG, KY 41129-9802  
3533

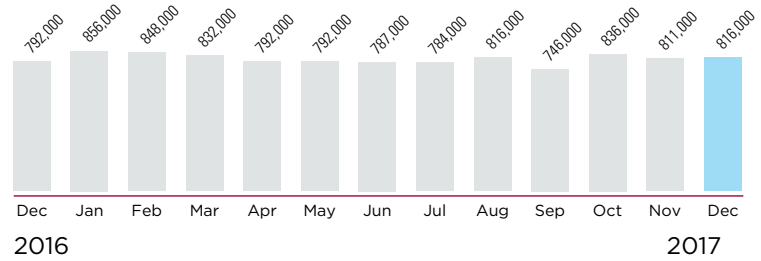
CY 31

**Notes from KPCO:**

**Thank you for being a paperless customer!** Sign up for billing and outage alerts to stay informed. You can manage your account by logging in at kentuckypower.com.

RIVERSIDE GENERATING COMPANY LLC  
25038 HIGHWAY 23  
# 23  
CATLETTSBURG, KY 41129-8635

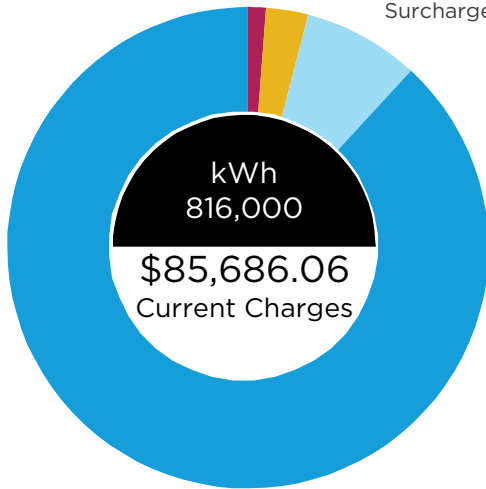
**Usage History (kWh):**



**Current bill summary:**

Billing from 12/01/17 - 12/31/17 (31 days)

Fuel Adj -\$1,056.88  
Taxes & Fees \$2,495.71  
Environmental  
Surcharge \$6,849.84



Electric Service  
\$77,397.39

**Methods of Payment**

- kentuckypower.com
- PO Box 24410  
Canton OH 44701-4410
- 1-800-611-0964 (\$2.95 fee)

**Need to get in touch?**

Customer Operations Center: 1-888-710-4237

Turn over for important information! ➤

Thank you for your prompt payment. Please include your account number on your check and return this stub with your payment.

RIVERSIDE GENERATING COMPANY LLC, HIGHWAY 23, CATLETTSBURG, KY 41129-9802



Send Inquiries To:  
PO BOX 24401  
CANTON, OH 44701-4401

Account # [REDACTED] 8568606

Amount due on or before  
January 18, 2018 **\$81,582.59**

Payment Amount \$

Pay \$85,661.72 after 01/18/2018

Make check payable and send to:  
KENTUCKY POWER COMPANY  
PO BOX 24410  
CANTON OH 44701-4410



0081582590085661720100000000000348736861902012001031900008



**Service Address:**

RIVERSIDE GENERATING COMPANY LLC  
HIGHWAY 23  
CATLETTSBURG, KY 41129-9802

Account # [REDACTED]

Billed Usage 12/17				
Usage	Power Factor	Power Factor Constant	Meter Location Comp.	Billed Usage
816,000	-	-	-	816,000 kWh
3,812,000	-	-	-	3,812,000 kW On-Pk
3,948,000	-	-	-	3,948,000 kW Off-Pk
Contract Capacity = 3,100.0			High Prev Demand = 6,520.0 On-Pk	
			High Prev Demand = 6,520.0 Off-Pk	

**Line Item Charges:**

Previous Charges	
Total Amount Due At Last Billing	\$ 128,565.77
Payment 12/21/17 - Thank You	-128,565.77
Late Payment Charge	-4,103.47
<b>Previous Balance Due</b>	<b>\$ -4,103.47</b>
Current KPCO Charges	
<b>Tariff 360 - Industrial Gnl Service 12/31/17</b>	
Rate Billing	\$ 69,406.68
Fuel Adj @ 0.0012952- Per kWh	-1,056.88
Kentucky Economic Development Surcharge	.15
Capacity Charge @ 0.0007490 Per kWh	611.18
Big Sandy 1 Operation Rider @ 0.0001900 Per kWh	155.04
Big Sandy 1 Operation Rider @ \$0.9600000 Per kW	3,755.52
Purchased Power Adj 0.2732000%	199.09
Big Sandy Retirement Rider 6.4263000%	3,269.73
Environmental Adj 13.4626000%	6,849.84
School Tax	2,495.71
<b>Current Balance Due</b>	<b>\$ 85,686.06</b>
<b>Total Balance Due</b>	<b>\$ 81,582.59</b>
Pay \$85,661.72 after 01/18/2018	

**Meter Read Details:**

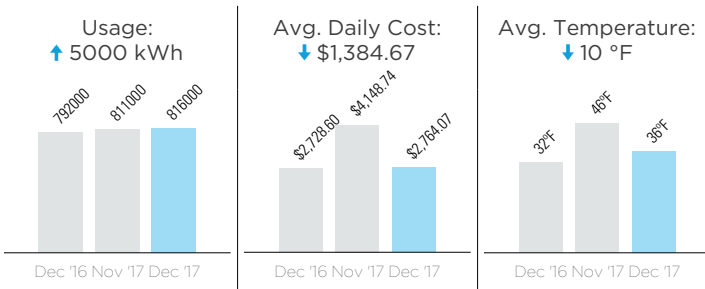
Meter #LT1204A035					
Previous	Type	Current	Type	Metered	Usage
27005	Actual	27510	Actual	505	505,000 kWh
-	-	2.448	Actual	2.448	2448 kW Off-Pk
-	-	2.020	Actual	2.02	2020 kW On-Pk
-	-	1.808	Actual	1.808	1808 kVAR
Service Period 11/30 - 12/31				Multiplier 1000	
Meter #LT1201A004					
Previous	Type	Current	Type	Metered	Usage
17834	Actual	18145	Actual	311	311,000 kWh
-	-	1.500	Actual	1.5	1500 kW Off-Pk
-	-	1.792	Actual	1.792	1792 kW On-Pk
-	-	0.000	Actual	0	0 kVAR
Service Period 11/30 - 12/31				Multiplier 1000	
Next scheduled read date should be between Jan 30 and Feb 2 .					

**Notes from KPCO:**

Due date does not apply to previous balance due.

**Usage Details:**

↑↓ Values reflect changes between current month and previous month.



Total usage for the past 12 months: 9,692,000 kWh

Average (Avg.) monthly usage: 807,667 kWh



PO BOX 24401  
CANTON, OH 44701-4401

Amount due on or before February 23, 2018 **\$89,709.66**

Bill mailing date is Feb 7, 2018  
Account # [REDACTED]

SERVICE ADDRESS: RIVERSIDE GENERATING COMPANY LLC, HIGHWAY 23, CATLETTSBURG, KY 41129-9802  
6973

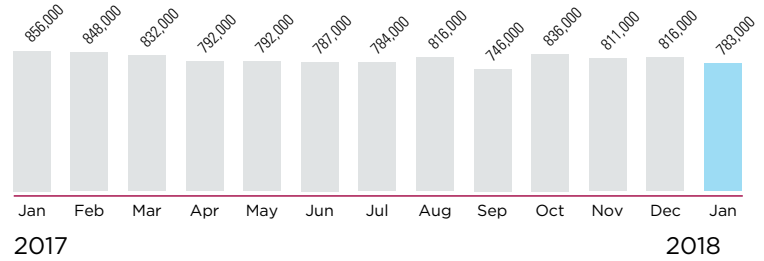
CY 31

**Notes from KPCO:**

You have an adjustment for this billing period. Please see the detail page for more information.

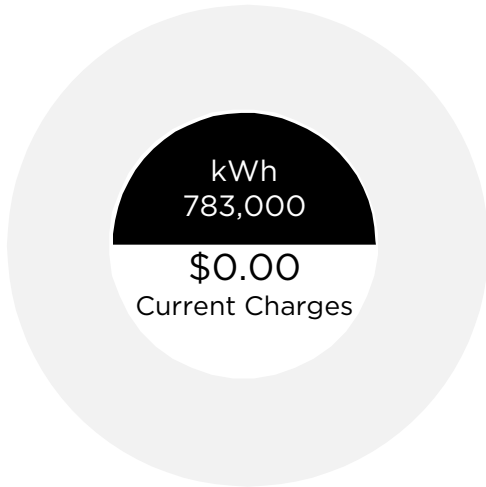
RIVERSIDE GENERATING COMPANY LLC  
25038 HIGHWAY 23  
# 23  
CATLETTSBURG, KY 41129-8635

**Usage History (kWh):**



**Current bill summary:**

Billing from 01/01/18 - 01/31/18 (31 days)



**Methods of Payment**

- kentuckypower.com
- PO Box 24410  
Canton OH 44701-4410
- 1-800-611-0964 (\$1.85 fee)

**Need to get in touch?**

Customer Operations Center: 1-888-710-4237

Please tear on dotted line.

Turn over for important information! ➔

Thank you for your prompt payment. Please include your account number on your check and return this stub with your payment.

RIVERSIDE GENERATING COMPANY LLC, HIGHWAY 23, CATLETTSBURG, KY 41129-9802



Send Inquiries To:  
PO BOX 24401  
CANTON, OH 44701-4401

Account # [REDACTED] 9022137

Amount due on or before February 23, 2018 **\$89,709.66**

Payment Amount \$

Pay \$94,195.14 after 02/23/2018

Make check payable and send to:  
KENTUCKY POWER COMPANY  
PO BOX 24410  
CANTON OH 44701-4410



0089709660094195140100000000000348736861907022502031900005



**Service Address:**

RIVERSIDE GENERATING COMPANY LLC  
HIGHWAY 23  
CATLETTSBURG, KY 41129-9802

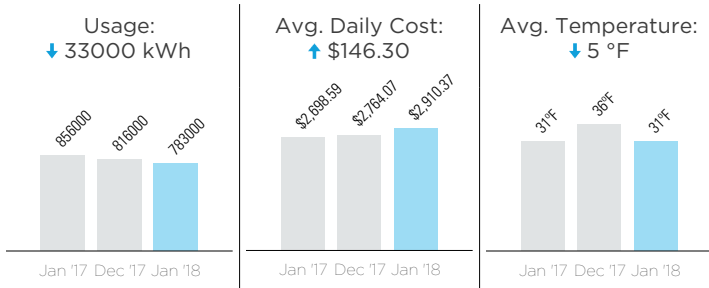
Account # [REDACTED]

**Line Item Charges:**

Previous Charges	
Total Amount Due At Last Billing	\$ 87,733.79
Adjustment	-88,245.50
<b>Previous Balance Due</b>	<b>\$ -511.71</b>
Current KPCO Charges	
Tariff 360 - Industrial Gnl Service 01/31/18	
Rate Billing	\$ 74,700.55
Fuel Adj @ 0.0029436- Per kWh	-2,304.84
Kentucky Economic Development Surcharge	.51
Capacity Charge @ 0.0007490 Per kWh	586.47
Big Sandy 1 Operation Rider	86.38
Big Sandy 1 Operation Rider	2,254.20
Purchased Power Adj	130.23
Decommissioning Rider 6.4263000%	3,638.91
Environmental Adj 15.0130000%	8,501.15
School Tax	2,627.81
<b>Rebilled Charges</b>	<b>\$ 90,221.37</b>
<b>Total Balance Due</b>	<b>\$ 89,709.66</b>
Pay \$94,195.14 after 02/23/2018	

**Usage Details:**

↑↓ Values reflect changes between current month and previous month.



Total usage for the past 12 months: 9,716,000 kWh  
Average (Avg.) monthly usage: 809,667 kWh

Billed Usage 01/18				
Usage	Power Factor	Power Factor Constant	Meter Location Comp.	Billed Usage
783,000	-	-	-	783,000 kWh
4,044,000	-	-	-	4,044,000 kW On-Pk
4,172,000	-	-	-	4,172,000 kW Off-Pk
Contract Capacity = 3,100.0			High Prev Demand = 6,520.0 On-Pk	
			High Prev Demand = 6,520.0 Off-Pk	

**Meter Read Details:**

Meter #LT1204A035					
Previous	Type	Current	Type	Metered	Usage
27510	Actual	27992	Actual	482	482,000 kWh
-	-	2.332	Actual	2.332	2332 kW Off-Pk
-	-	2.252	Actual	2.252	2252 kW On-Pk
-	-	1.868	Actual	1.868	1868 kVAR
Service Period 12/31 - 01/31				Multiplier 1000	
Meter #LT1201A004					
Previous	Type	Current	Type	Metered	Usage
18145	Actual	18446	Actual	301	301,000 kWh
-	-	1.840	Actual	1.84	1840 kW Off-Pk
-	-	1.792	Actual	1.792	1792 kW On-Pk
-	-	0.000	Actual	0	0 kVAR
Service Period 12/31 - 01/31				Multiplier 1000	
Next scheduled read date should be between Feb 27 and Mar 2 .					

**Notes from KPCO:**

**Thank you for being a paperless customer!** Sign up for billing and outage alerts to stay informed. You can manage your account by logging in at kentuckypower.com.

**Corrected Bill.**

Due date does not apply to previous balance due.  
Register for online services at [www.KentuckyPower.com](http://www.KentuckyPower.com).  
Registration is **free and easy** and gives you the convenience of 24-hour access to your account. You can sign up for paperless billing, view your bill, check your usage, update your contact information, and much more.  
**Make your life easier.** You can write one check for multiple electric accounts!



PO BOX 24401  
CANTON, OH 44701-4401

Amount due on or before **\$97,826.31**  
March 19, 2018

Bill mailing date is Mar 1, 2018  
Account # [REDACTED]

SERVICE ADDRESS: RIVERSIDE GENERATING COMPANY LLC, HIGHWAY 23, CATLETTSBURG, KY 41129-9802  
3597

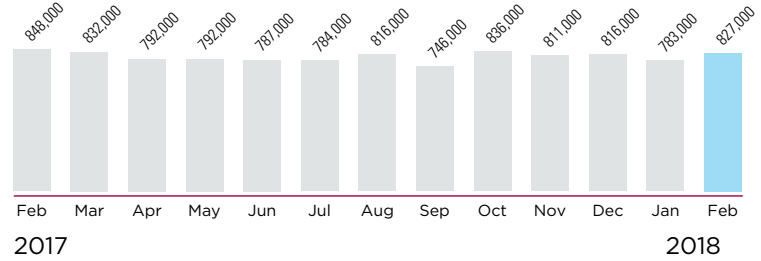
CY 31

### Notes from KPCO:

**Thank you for being a paperless customer!** Sign up for billing and outage alerts to stay informed. You can manage your account by logging in at kentuckypower.com.

RIVERSIDE GENERATING COMPANY LLC  
25038 HIGHWAY 23  
# 23  
CATLETTSBURG, KY 41129-8635

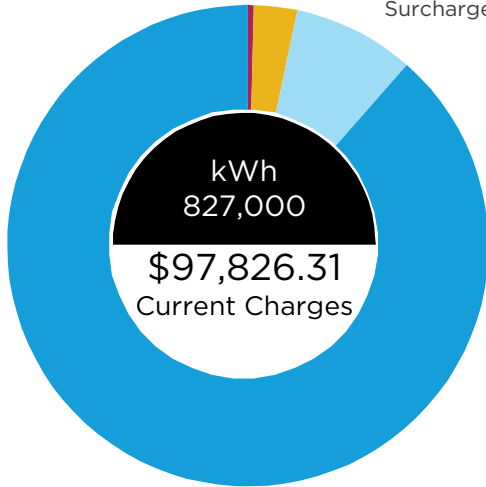
### Usage History (kWh):



### Current bill summary:

Billing from 02/01/18 - 02/28/18 (28 days)

Fuel Adj \$406.64  
Taxes & Fees \$2,849.31  
Environmental  
Surcharge \$7,969.42



### Methods of Payment

- kentuckypower.com
- PO Box 24410  
Canton OH 44701-4410
- 1-800-611-0964 (\$1.85 fee)

### Need to get in touch?

Customer Operations Center: 1-888-710-4237

Please tear on dotted line.

Turn over for important information! ➤

Thank you for your prompt payment. Please include your account number on your check and return this stub with your payment.

RIVERSIDE GENERATING COMPANY LLC, HIGHWAY 23, CATLETTSBURG, KY 41129-9802



Send Inquiries To:  
PO BOX 24401  
CANTON, OH 44701-4401

Account # [REDACTED] 9782631

Amount due on or before **\$97,826.31**  
March 19, 2018

Payment Amount \$

Pay \$102,717.63 after 03/19/2018

Make check payable and send to:  
KENTUCKY POWER COMPANY  
PO BOX 24410  
CANTON OH 44701-4410



0097826310102717630100000000000348736861901032103031900002



### Meter Read Details:

### Service Address:

RIVERSIDE GENERATING COMPANY LLC  
HIGHWAY 23  
CATLETTSBURG, KY 41129-9802

Account # [REDACTED]

Meter #LT1204A035					
Previous	Type	Current	Type	Metered	Usage
27992	Actual	28514	Actual	522	522,000 kWh
-	-	1.636	Actual	1.636	1636 kW Off-Pk
-	-	2.104	Actual	2.104	2104 kW On-Pk
-	-	1.808	Actual	1.808	1808 kVAR
Service Period 01/31 - 02/28				Multiplier 1000	
Meter #LT1201A004					
Previous	Type	Current	Type	Metered	Usage
18446	Actual	18751	Actual	305	305,000 kWh
-	-	1.280	Actual	1.28	1280 kW Off-Pk
-	-	1.604	Actual	1.604	1604 kW On-Pk
-	-	0.000	Actual	0	0 kVAR
Service Period 01/31 - 02/28				Multiplier 1000	
Next scheduled read date should be between Mar 29 and Apr 4 .					

### Line Item Charges:

Previous Charges	
Total Amount Due At Last Billing	\$ 89,709.66
Payment 02/13/18 - Thank You	-87,733.79
Payment 02/21/18 - Thank You	-1,975.87
<b>Previous Balance Due</b>	<b>\$ .00</b>
Current KPCO Charges	
<b>Tariff 360 - Industrial Gnl Service 02/28/18</b>	
Rate Billing	\$ 82,062.42
Fuel Adj @ 0.0004917 Per kWh	406.64
Kentucky Economic Development Surcharge	1.00
Capacity Charge @ 0.0007490 Per kWh	619.42
Purchased Power Adj	40.55
Decommissioning Rider 6.4263000%	3,877.55
Environmental Adj 13.2078000%	7,969.42
School Tax	2,849.31
<b>Current Balance Due</b>	<b>\$ 97,826.31</b>
<b>Total Balance Due</b>	<b>\$ 97,826.31</b>
Pay \$102,717.63 after 03/19/2018	

### Notes from KPCO:

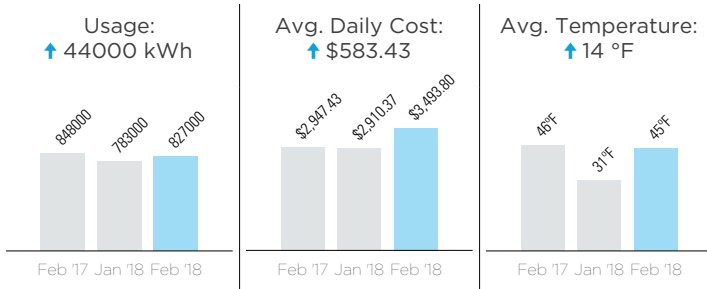
Due date does not apply to previous balance due.

To avoid unnecessary delays in crediting your electric payment, please **do not paper clip or staple your check to the bill payment stub.**

\*If you pay your electric bill in person, remember to pay only at **AUTHORIZED** pay stations. These locations send notice of your payment immediately to **Kentucky Power** which could prevent service disconnection. Pay stations may charge a fee for this service. Keep your receipt as proof of payment. For a list of authorized pay stations or other payment options, visit our website at [www.kentuckypower.com](http://www.kentuckypower.com) or call the number above.\*\*

### Usage Details:

↑↓ Values reflect changes between current month and previous month.



Total usage for the past 12 months: 9,643,000 kWh

Average (Avg.) monthly usage: 803,583 kWh

Contract Capacity = 3,100.0	High Prev Demand = 6,520.0 On-Pk
	High Prev Demand = 6,520.0 Off-Pk





PO BOX 24401  
CANTON, OH 44701-4401

Amount due on or before **\$98,172.46**  
April 18, 2018

Bill mailing date is Apr 2, 2018  
Account # [REDACTED]

SERVICE ADDRESS: RIVERSIDE GENERATING COMPANY LLC, HIGHWAY 23, CATLETTSBURG, KY 41129-9802  
3717

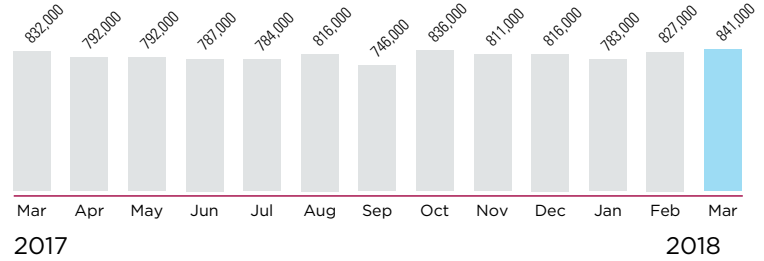
CY 31

### Notes from KPCO:

**Thank you for being a paperless customer!** Sign up for billing and outage alerts to stay informed. You can manage your account by logging in at [kentuckypower.com](http://kentuckypower.com).

RIVERSIDE GENERATING COMPANY LLC  
25038 HIGHWAY 23  
# 23  
CATLETTSBURG, KY 41129-8635

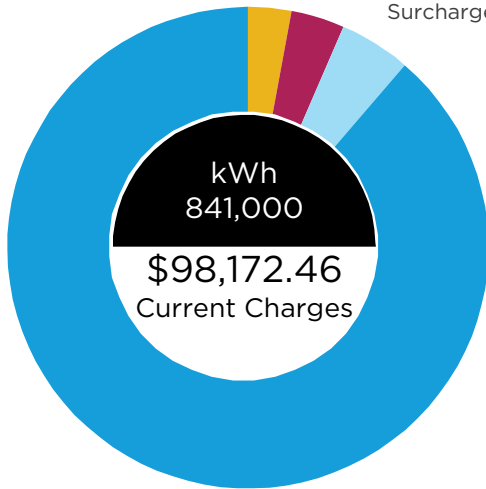
### Usage History (kWh):



### Current bill summary:

Billing from 03/01/18 - 03/31/18 (31 days)

Taxes & Fees \$2,859.39  
Fuel Adj \$3,516.14  
Environmental  
Surcharge \$4,725.95



Electric Service  
\$87,070.98

### Methods of Payment

- [kentuckypower.com](http://kentuckypower.com)
- PO Box 24410  
Canton OH 44701-4410
- 1-800-611-0964 (\$1.85 fee)

### Need to get in touch?

Customer Operations Center: 1-888-710-4237

Please tear on dotted line.

Turn over for important information! ➤

Thank you for your prompt payment. Please include your account number on your check and return this stub with your payment.

RIVERSIDE GENERATING COMPANY LLC, HIGHWAY 23, CATLETTSBURG, KY 41129-9802



Send Inquiries To:  
PO BOX 24401  
CANTON, OH 44701-4401

Make check payable and send to:  
KENTUCKY POWER COMPANY  
PO BOX 24410  
CANTON OH 44701-4410



9817246

Account # [REDACTED]  
RIVERSIDE GENERATING COMPANY LLC

Amount due on or before **\$98,172.46**  
April 18, 2018

Payment Amount \$

Pay \$103,081.08 after 04/18/2018

0098172460103081080100000000000348736861902042004031900009



**Service Address:**

RIVERSIDE GENERATING COMPANY LLC  
HIGHWAY 23  
CATLETTSBURG, KY 41129-9802

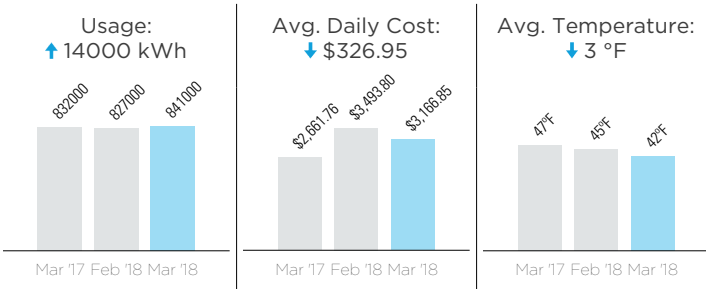
Account # [REDACTED]

**Line Item Charges:**

Previous Charges	
Total Amount Due At Last Billing	\$ 97,826.31
Payment 03/14/18 - Thank You	-97,826.31
<b>Previous Balance Due</b>	<b>\$ .00</b>
Current KPCO Charges	
Tariff 360 - Industrial Gnl Service 03/31/18	
Rate Billing	\$ 82,501.20
Fuel Adj @ 0.0041809 Per kWh	3,516.14
Kentucky Economic Development Surcharge	1.00
Capacity Charge @ 0.0007490 Per kWh	629.91
Purchased Power Adj	23.01
Decommissioning Rider 6.4263000%	3,915.86
Environmental Adj 7.7557500%	4,725.95
School Tax	2,859.39
<b>Current Balance Due</b>	<b>\$ 98,172.46</b>
<b>Total Balance Due</b>	<b>\$ 98,172.46</b>
Pay \$103,081.08 after 04/18/2018	

**Usage Details:**

↑↓Values reflect changes between current month and previous month.



Total usage for the past 12 months: 9,622,000 kWh

Average (Avg.) monthly usage: 801,833 kWh

Contract Capacity = 3,100.0	High Prev Demand = 6,520.0 On-Pk
	High Prev Demand = 6,520.0 Off-Pk

**Meter Read Details:**

Meter #LT1204A035					
Previous	Type	Current	Type	Metered	Usage
28514	Actual	29040	Actual	526	526,000 kWh
-	-	1,546	Actual	1,546	1546 kW Off-Pk
-	-	1,940	Actual	1.94	1940 kW On-Pk
-	-	1,840	Actual	1.84	1840 kVAR
Service Period 02/28 - 03/31				Multiplier 1000	
Meter #LT1201A004					
Previous	Type	Current	Type	Metered	Usage
18751	Actual	19066	Actual	315	315,000 kWh
-	-	1,152	Actual	1,152	1152 kW Off-Pk
-	-	1,576	Actual	1,576	1576 kW On-Pk
-	-	0,000	Actual	0	0 kVAR
Service Period 02/28 - 03/31				Multiplier 1000	
Next scheduled read date should be between Apr 27 and May 2 .					

**Notes from KPCO:**

**Stealing copper is illegal** and can have deadly consequences. **Reporting copper theft** could save a life, so if you have any information, **please call 1-866-747-5845.**

Due date does not apply to previous balance due.

**Riverside Generating Company, L.L.C.**  
**Case No. 2017-00472**  
**Commission Staff's First Request for Information**

2. Refer to the Hammond Testimony, page 3. Confirm that Riverside has always been served under Kentucky Power's Tariff N.U.G.

**Response:**

Riverside believes it has always been served under Kentucky Power's Tariff N.U.G. but does not possess information or knowledge sufficient to definitively confirm that belief.

**Riverside Generating Company, L.L.C.**  
**Case No. 2017-00472**  
**Commission Staff's First Request for Information**

3. Refer to the Hammond Testimony, page 4, lines 3-4. For each month of calendar year 2017, provide the amount of energy produced and the amount of energy consumed by the Zelda and Foothill generating stations.

**Response:**

Please see Page 2 of this Response.

<b>Zelda (035)</b>	<b>Jan-17</b>	<b>Feb-17</b>	<b>Mar-17</b>	<b>Apr-17</b>	<b>May-17</b>	<b>Jun-17</b>	<b>Jul-17</b>	<b>Aug-17</b>	<b>Sep-17</b>	<b>Oct-17</b>	<b>Nov-17</b>	<b>Dec-17</b>	<b>YTD 2017</b>
Energy Usage (KWh) Monthly	537,144	561,052	512,720	494,060	489,040	475,112	470,404	466,628	479,440	438,412	501,622	440,808	5,866,442
Zelda 1 MWh	5,823	0	15,214	2,082	6,321	3,841	8,380	5,141	16,454	9,365	6,345	18,705	97,671
Zelda 2 MWh	5,227	0	12,669	717	1,304	3,096	8,006	5,471	14,339	7,342	5,168	15,407	78,746
Zelda 3 MWh	3,901	0	11,773	0	5,052	2,897	7,531	5,939	13,977	9,206	5,077	17,787	83,140

<b>Foothills (004)</b>	<b>Jan-17</b>	<b>Feb-17</b>	<b>Mar-17</b>	<b>Apr-17</b>	<b>May-17</b>	<b>Jun-17</b>	<b>Jul-17</b>	<b>Aug-17</b>	<b>Sep-17</b>	<b>Oct-17</b>	<b>Nov-17</b>	<b>Dec-17</b>	<b>YTD 2017</b>
Energy Usage (KWh) Monthly	259,984	301,088	338,080	344,000	307,164	322,732	323,076	323,244	343,208	316,272	340,346	383,196	3,902,390
Foothills 1 MWh	5,162	0	11,546	2,550	6,027	3,990	9,715	3,279	15,205	9,880	6,937	18,314	92,605
Foothills 2 MWh	1,245	0	6,374	1,942	4,643	3,594	9,739	5,836	14,814	8,996	7,245	18,416	82,844

**Riverside Generating Company, L.L.C.**  
**Case No. 2017-00472**  
**Commission Staff's First Request for Information**

4. Refer to the Hammond Testimony, page 4, lines 6-10. State when Riverside determined that it wanted to self-supply its station power in accordance with the terms of the PJM Interconnection, LLC's Open Access Transmission Tariff ("PJM OATT").

**Response:**

Riverside determined in or around March 2017 to confirm its ability to self-supply station power in accordance with PJM's OATT.

**Riverside Generating Company, L.L.C.**  
**Case No. 2017-00472**  
**Commission Staff's First Request for Information**

5. Refer to the Hammond Testimony, page 4, lines 14-18. Provide a copy of Section 1.7.10 of the PJM OATT.

**Response:**

Please see Page 2 through Page 4 of this Response.

Intra-PJM Tariffs --> OPEN ACCESS TRANSMISSION TARIFF --> OATT VI. ADMINISTRATION AND STUDY OF NEW SERVICE REQUESTS; R --> OATT ATTACHMENT K -- APPENDIX --> OATT ATTACHMENT K APPENDIX SECTION 1 - MARKET OPERATIONS --> OATT Attachment K Appendix Sec 1.7 General

this Schedule. PJMSettlement shall not be a contracting party with respect to such self-scheduled or self-supplied transactions.

### **1.7.9 Delivery to an External Market Buyer.**

A purchase of Spot Market Energy by an External Market Buyer shall be delivered to a bus or buses at the electrical boundaries of the PJM Region specified by the Office of the Interconnection, or to load in such area that is not served by Network Transmission Service, using Point-to-Point Transmission Service paid for by the External Market Buyer. Further delivery of such energy shall be the responsibility of the External Market Buyer.

### **1.7.10 Other Transactions.**

#### **(a) Bilateral Transactions.**

(i) In addition to transactions in the PJM Interchange Energy Market, Market Participants may enter into bilateral contracts for the purchase or sale of electric energy to or from each other or any other entity, subject to the obligations of Market Participants to make Generation Capacity Resources available for dispatch by the Office of the Interconnection. Such bilateral contracts shall be for the physical transfer of energy to or from a Market Participant and shall be reported to and coordinated with the Office of the Interconnection in accordance with this Schedule and pursuant to the LLC's rules relating to its InSchedule and ExSchedule tools.

(ii) For purposes of clarity, with respect to all bilateral contracts for the physical transfer of energy to a Market Participant inside the PJM Region, title to the energy that is the subject of the bilateral contract shall pass to the buyer at the source specified for the bilateral contract, and the further transmission of the energy or further sale of the energy into the PJM Interchange Energy Market shall be transacted by the buyer under the bilateral contract. With respect to all bilateral contracts for the physical transfer of energy to an entity outside the PJM Region, title to the energy shall pass to the buyer at the border of the PJM Region and shall be delivered to the border using transmission service. In no event shall the purchase and sale of energy between Market Participants under a bilateral contract constitute a transaction in the PJM Interchange Energy Market or be construed to define PJMSettlement as a contracting party to any bilateral transactions between Market Participants.

(iii) Market Participants that are parties to bilateral contracts for the purchase and sale and physical transfer of energy reported to and coordinated with the Office of the Interconnection under this Schedule shall use all reasonable efforts, consistent with Good Utility Practice, to limit the megawatt hours of such reported transactions to amounts reflecting the expected load and other physical delivery obligations of the buyer under the bilateral contract.

(iv) All payments and related charges for the energy associated with a bilateral contract shall be arranged between the parties to the bilateral contract and shall not be



Intra-PJM Tariffs --> OPEN ACCESS TRANSMISSION TARIFF --> OATT VI. ADMINISTRATION AND STUDY OF NEW SERVICE REQUESTS; R --> OATT ATTACHMENT K – APPENDIX --> OATT ATTACHMENT K APPENDIX SECTION 1 - MARKET OPERATIONS --> OATT Attachment K Appendix Sec 1.7 General

billed or settled by the Office of the Interconnection or PJMSettlement. The LLC, PJMSettlement, and the Members will not assume financial responsibility for the failure of a party to perform obligations owed to the other party under a bilateral contract reported and coordinated with the Office of the Interconnection under this Schedule.

(v) A buyer under a bilateral contract shall guarantee and indemnify the LLC, PJMSettlement, and the Members for the costs of any Spot Market Backup used to meet the bilateral contract seller's obligation to deliver energy under the bilateral contract and for which payment is not made to PJMSettlement by the seller under the bilateral contract, as determined by the Office of the Interconnection. Upon any default in obligations to the LLC or PJMSettlement by a Market Participant, the Office of the Interconnection shall (i) not accept any new InSchedule or ExSchedule reporting by the Market Participant and (ii) terminate all of the Market Participant's InSchedules and ExSchedules associated with its bilateral contracts previously reported to the Office of the Interconnection for all days where delivery has not yet occurred. All claims regarding a buyer's default to a seller under a bilateral contract shall be resolved solely between the buyer and the seller. In such circumstances, the seller may instruct the Office of the Interconnection to terminate all of the InSchedules and ExSchedules associated with bilateral contracts between buyer and seller previously reported to the Office of the Interconnection. PJMSettlement shall assign its claims against a seller with respect to a seller's nonpayment for Spot Market Backup to a buyer to the extent that the buyer has made an indemnification payment to PJMSettlement with respect to the seller's nonpayment.

(vi) Bilateral contracts that do not contemplate the physical transfer of energy to or from a Market Participant are not subject to this Schedule, shall not be reported to and coordinated with the Office of the Interconnection, and shall not in any way constitute a transaction in the PJM Interchange Energy Market.

(b) Market Participants shall have Spot Market Backup with respect to all bilateral transactions that contemplate the physical transfer of energy to or from a Market Participant, that are not Dynamic Transfers pursuant to Section 1.12 and that are curtailed or interrupted for any reason (except for curtailments or interruptions through Load Management for load located within the PJM Region).

(c) To the extent the Office of the Interconnection dispatches a Generating Market Buyer's generation resources, such Generating Market Buyer may elect to net the output of such resources against its hourly Equivalent Load. Such a Generating Market Buyer shall be deemed a buyer from the PJM Interchange Energy Market to the extent of its PJM Interchange Imports, and shall be deemed a seller to the PJM Interchange Energy Market to the extent of its PJM Interchange Exports.

(d) A Market Seller may self-supply Station Power for its generation facility in accordance with the following provisions:

Intra-PJM Tariffs --> OPEN ACCESS TRANSMISSION TARIFF --> OATT VI. ADMINISTRATION AND STUDY OF NEW SERVICE REQUESTS; R --> OATT ATTACHMENT K -- APPENDIX --> OATT ATTACHMENT K APPENDIX SECTION 1 - MARKET OPERATIONS --> OATT Attachment K Appendix Sec 1.7 General

(i) A Market Seller may self-supply Station Power for its generation facility during any month (1) when the net output of such facility is positive, or (2) when the net output of such facility is negative and the Market Seller during the same month has available at other of its generation facilities positive net output in an amount at least sufficient to offset fully such negative net output. For purposes of this subsection (d), “net output” of a generation facility during any month means the facility’s gross energy output, less the Station Power requirements of such facility, during that month. The determination of a generation facility’s or a Market Seller’s monthly net output under this subsection (d) will apply only to determine whether the Market Seller self-supplied Station Power during the month and will not affect the price of energy sold or consumed by the Market Seller at any bus during any hour during the month. For each hour when a Market Seller has positive net output and delivers energy into the Transmission System, it will be paid the LMP at its bus for that hour for all of the energy delivered. Conversely, for each hour when a Market Seller has negative net output and has received Station Power from the Transmission System, it will pay the LMP at its bus for that hour for all of the energy consumed.

(ii) Transmission Provider will determine the extent to which each affected Market Seller during the month self-supplied its Station Power requirements or obtained Station Power from third-party providers (including affiliates) and will incorporate that determination in its accounting and billing for the month. In the event that a Market Seller self-supplies Station Power during any month in the manner described in subsection (1) of subsection (d)(i) above, Market Seller will not use, and will not incur any charges for, transmission service. In the event, and to the extent, that a Market Seller self-supplies Station Power during any month in the manner described in subsection (2) of subsection (d)(i) above (hereafter referred to as “remote self-supply of Station Power”), Market Seller shall use and pay for transmission service for the transmission of energy in an amount equal to the facility’s negative net output from Market Seller’s generation facility(ies) having positive net output. Unless the Market Seller makes other arrangements with Transmission Provider in advance, such transmission service shall be provided under Part II of the PJM Tariff and shall be charged the hourly rate under Schedule 8 of the PJM Tariff for Non-Firm Point-to-Point Transmission Service with an election to pay congestion charges, provided, however, that no reservation shall be necessary for such transmission service and the terms and charges under Schedules 1, 1A, 2 through 6, 9 and 10 of the PJM Tariff shall not apply to such service. The amount of energy that a Market Seller transmits in conjunction with remote self-supply of Station Power will not be affected by any other sales, purchases, or transmission of capacity or energy by or for such Market Seller under any other provisions of the PJM Tariff.

(iii) A Market Seller may self-supply Station Power from its generation facilities located outside of the PJM Region during any month only if such generation facilities in fact run during such month and Market Seller separately has reserved transmission service and scheduled delivery of the energy from such resource in advance into the PJM Region.

### **1.7.11 Emergencies.**

**Riverside Generating Company, L.L.C.**  
**Case No. 2017-00472**  
**Commission Staff's First Request for Information**

6. Refer to the Hammond Testimony, page 5, lines 11-17. Provide copies of any written or electronic correspondence between Riverside and Kentucky Power regarding the request by Riverside to self-supply its own power needs remotely.

**Response:**

Please see Page 2 through Page 27 of this Response.

## Audra Cannon

---

**From:** George Scienski  
**Sent:** Thursday, March 9, 2017 10:07 AM  
**To:** klborders@aep.com  
**Cc:** sgreene@riversidegeneration.com  
**Subject:** FW: Station Power Netting

Ken:

Attached below per our discussion is the overview provided by PJM regarding station power netting and the contact information for the Riverside client representative.

Thanks for your help, and I look forward to a follow-up in the coming weeks.

George

---

George S. Scienski  
LS Power Development, LLC  
One Tower Center, 21st Floor  
East Brunswick, NJ 08816  
office phone (NJ): 732-867-5860  
office phone (SCES): 254-896-4218  
cell phone: **732-354-7641**  
fax: 732-249-7290  
gscienski@lspower.com

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**From:** Burnley, Helen M. [mailto:Helen.Burnley@pjm.com]  
**Sent:** Tuesday, January 24, 2017 2:59 PM  
**To:** George Scienski  
**Subject:** RE: Station Power Netting

Hi George:

Per my response back to you in case #34396”:

The mechanics of PJM’s Station Power settlements are documented in Manual 28, Section 13 as well as in the PJM Tariff, Attachment K – Appendix, Section 1.7.10. Station Power Settlements occur are on a one-month lag.

As part of PJM’s station power settlements, PJM determines if a generator self-supplied its Station Power or obtained Station Power from third-party providers.  
A generator may self-supply Station Power for its generation facility during any month (1) when the net output of such facility is positive, or (2) when the net output of such facility is negative and the generator during the same month has available at other of its generation facilities positive net output in an amount at least sufficient to offset fully negative net output.

PJM station power settlements is controlled by what is or is not submitted to PJM via the Power Meter tool.

If the generator has a wholesale station service arrangement, a negative MWh value should be reported in Power Meter when the unit is off-line and consuming energy.

If the generator has a superseding retail station service arrangement, a zero (0) MWh value should be reported in Power Meter when the unit is off-line and consuming energy. In this case, compensation for station power consumption is handled bilaterally between the EDCs and generation owners and PJM billing adjustments for station power are not applicable.

Regardless of which party actually controls the submission of values into Power Meter, it is both the EDC and Generation Owner's mutual responsibility to ensure values are submitted into Power Meter as accurately as possible by the established submission deadlines.

For example, the Generation Owner should not submit Station Power negatives into Power Meter during offline hours if they have a superseding retail agreement with the EDC or another third party.

Similarly, the EDC would want to make sure Station Power negatives are submitted into Power Meter if they have no retail Station Power agreement with the generator.

If a participant needs information on contacts at a given EDC regarding Station Power arrangements, you can give PJM permission to forward your contact information and inquiry to the given EDC's registered Power Meter users.

For the PJM weekly and monthly bills, PJM market settlements are based on generator values as reported to Power Meter. Positive Generation reported in Power Meter would result in a credit (MWh \* LMP) on the PJM Bill. Negative Generation (i.e. consumption) reported in Power Meter would result in a charge (MWh \* LMP) on the PJM Bill.

After the given month's bill is issued, PJM evaluates if a generator (or group of generators) has net negative generation for the month.

The generators that have a net negative amount of MWs for the month will then be classified into two categories.

If a group of generators had net positive total generation for the calendar month but had one or more individual generators each had a total negative generation for the month, the negative generators had Remote Self-Supply. Remote self-supply indicates station power at a particular generator was supplied from another generator in its portfolio.

#### Remote Self-Supply

For those generators which received Station Power through Remote Self-Supply, the PJM member needs to be charged non-firm point-to-point transmission service. This amount is based on the non-firm point-to-point transmission service rate multiplied by the negative MW amount.

If a generator or group of generators had net negative total generation for the month, those generators which had a negative net generation amount were served station power by retail supply/third party supply. Retail supply means the local EDC or other third party needed to serve the station power load of a generator and will therefore charge the generator owner the appropriate retail rates.

#### Retail Supply (Third-Party Supply)

In situations of Retail Supply, the generator is charged the wholesale rate for station service (the LMP for the generator bus) during the original wholesale market settlements. However, since those generators actually received Station Power through Retail Supply, the generator actually received the needed power from the local EDC or third party at the retail rate. This amount will be charged to the generator owner by the EDC, and the original wholesale LMP charge needs to be 'backed-out' – not charged to the generator. Thus the generator owner gets a credit, and the EDC will receive a charge, both of which are to balance the original wholesale charge which was made earlier in the settlements process.

Generators can group together to form a single station service netting portfolio. A portfolio is defined by generators which share the same lowest level corporate entity ownership.

If a generator has defined itself as its own LLC, it cannot net with other generators, even if they are "owned" in the PJM Market by a common member. For example, if unit A and unit B are "owned" in the PJM Energy Market settlements by Power Marketer X. If there is a Unit A LLC and a Unit B LLC, these two units cannot net relative to the Station Service netting evaluation.

Conversely, if two units are “owned” in the PJM Energy Market settlements by two different PJM Members but their lowest level corporate parent is the same company, then they can net relative to the station service netting evaluation. As long as the portfolio is net Generation to the Grid for the month, then there is no retail billing. However, if a Unit within the portfolio is net negative, then PJM charges 67 Cents per MWh of net negative for the transmission service to remote supply from unit A to unit B.

Additional details can be found in PJM Manual 28, Section 13 at (Home > Library > Manuals)

<http://www.pjm.com/library/manuals.aspx>

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As part of PJM’s station power settlements, PJM determines if a generator self-supplied its Station Power or obtained Station Power from third-party providers.

A generator may self-supply Station Power for its generation facility during any month (1) when the net output of such facility is positive, or (2) when the net output of such facility is negative and the generator during the same month has available at other of its generation facilities positive net output in an amount at least sufficient to offset fully negative net output.

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For the PJM weekly and monthly bills, PJM market settlements are based on generator values as reported to Power Meter. Positive Generation reported in Power Meter would result in a credit (MWh \* LMP) on the PJM Bill. Negative Generation (i.e. consumption) reported in Power Meter would result in a charge (MWh \* LMP) on the PJM Bill.

After the given month’s bill is issued, PJM evaluates if a generator (or group of generators) has net negative generation for the month.

The generators that have a net negative amount of MWs for the month will then be classified into two categories.

If a group of generators had net positive total generation for the calendar month but had one or more individual generators each had a total negative generation for the month, the negative generators had Remote Self-Supply. Remote self-supply indicates station power at a particular generator was supplied from another generator in its portfolio.

#### Remote Self-Supply

For those generators which received Station Power through Remote Self-Supply, the PJM member needs to be charged non-firm point-to-point transmission service. This amount is based on the non-firm point-to-point transmission service rate multiplied by the negative MW amount.

If a generator or group of generators had net negative total generation for the month, those generators which had a negative net generation amount were served station power by retail supply/third party supply. Retail supply means the local EDC or other third party needed to serve the station power load of a generator and will therefore charge the generator owner the appropriate retail rates.

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If a generator has defined itself as its own LLC, it cannot net with other generators, even if they are "owned" in the PJM Market by a common member. For example, if unit A and unit B are "owned" in the PJM Energy Market settlements by Power Marketer X. If there is a Unit A LLC and a Unit B LLC, these two units cannot net relative to the Station Service netting evaluation.

Conversely, if two units are "owned" in the PJM Energy Market settlements by two different PJM Members but their lowest level corporate parent is the same company, then they can net relative to the station service netting evaluation. As long as the portfolio is net Generation to the Grid for the month, then there is no retail billing. However, if a Unit within the portfolio is net negative, then PJM charges 67 Cents per MWh of net negative for the transmission service to remote supply from unit A to unit B.

Additional details can be found in PJM Manual 28, Section 13 at (Home > Library > Manuals)  
<http://www.pjm.com/library/manuals.aspx>

Best,

Helen Burnley  
Sr. Client Manager  
Client Management and Services

(610) 635-3468 | C: (610) 960-2128 | [Helen.Burnley@pjm.com](mailto:Helen.Burnley@pjm.com)  
PJM Interconnection | 2750 Monroe Blvd. | Audubon, PA 19403



**Audra Cannon**

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**From:** Ken Borders <klborders@aep.com>  
**Sent:** Friday, March 17, 2017 3:28 PM  
**To:** George Scienski  
**Subject:** Kentucky Power - Question about station netting - Riverside Generation  
**Attachments:** 2017 JAN 31 KPCO NUG TARIFF.pdf; 2015 SEP 29 INDUSTRIAL GENERAL SERVICE.pdf

Mr. Scienski,

A few weeks ago you inquired about the possibility of "netting" station power in order to obtain power at a wholesale rate for the Riverside facility in Lawrence County, Kentucky. Kentucky Power offers the response to your question below.

As an independent power producer within Kentucky Power Company's retail service territory, the Riverside generating facility is required to obtain station power at retail from Kentucky Power under the PSC-approved Tariff N.U.G. (Non-Utility Generator), as Riverside has done for many years. Tariff N.U.G., which is attached, does not permit an IPP to obtain station power at wholesale under the PJM Open Access Transmission Tariff unless the IPP can "provide Startup and Station Power from commonly owned generation facilities that are not located on the site of the customer's generator (remote self-supply)." Our understanding is that there are no other "commonly owned generation facilities" in the same corporate entity as the Riverside generating facility, and therefore Riverside is not eligible for remote self-supply and may not obtain station power at wholesale under the PJM tariff. Rather, Riverside must continue to obtain station power at retail from Kentucky Power under Tariff N.U.G.

Please note the Station Contract Capacity referred to in Tariff N.U.G. is supplied under the Industrial General Service tariff 360.

Tariff N.U.G. is attached along with Tariff I.G.S. (Industrial General Service). Should you have additional questions or need additional information please feel free to contact me.

Sincerely,

Ken Borders - Customer Service Engineer  
Kentucky Power Company  
12333 Kevin Avenue  
Ashland, KY 41102  
Phone (606) 929-1453  
klborders@aep.com



**TARIFF N.U.G.  
(Non-Utility Generator)**

**AVAILABILITY OF SERVICE.**

This tariff is applicable to customers with generation facilities which have a total design capacity of over 1,000 kW that intends to schedule, deliver and sell the net electric output of the facility at wholesale, and who require Commissioning Power, Startup Power and/or Station Power service from the Company.

Service to any load that is electrically isolated from the Customer's generator shall be separately metered and provided in accordance with the generally available demand-metered tariff appropriate for such service to the Customer.

This tariff is not available for standby, backup, maintenance, or supplemental service for wholesale or retail loads served by customer's generator.

**DEFINITIONS.**

1. **Commissioning Power** - The electrical energy and capacity supplied to the customer prior to the commercial operation of the customer's generator, including initial construction and testing phases.
2. **Station Power** - The electrical energy and capacity supplied to the customer to serve the auxiliary loads at the customer's generation facilities, usually when the customer's generator is not operating. Station Power does not include Startup Power.
3. **Startup Power** - The electrical energy and capacity supplied to the customer following a planned or forced outage of the customer's generator for the purpose of returning the customer's generator to synchronous operation.

**COMMISSIONING POWER SERVICE.**

Customers requiring Commissioning Power shall take service under Tariff T.S. or by special agreement with the Company.

The Customer shall coordinate its construction and testing with the Company to ensure that the customer's operations do not cause any undue interference with the Company's obligations to provide service to its other customers or impose a burden on the Company's system or any system interconnected with the Company.

**STATION POWER SERVICE.**

Customers requiring Station Power shall take service under the generally available demand-metered tariff appropriate for the customer's Station Power requirements.

**Station Contract Capacity** - The Customer shall contract for a definite amount of electrical capacity in kW sufficient to meet the maximum Station Power requirements that the Company is expected to supply under the generally available demand-metered tariff appropriate for the customer.

**STARTUP POWER SERVICE.**

Customers requiring Startup Power have the option of contracting for such service under the terms of this tariff or under the generally available demand-metered tariff appropriate for the customer's Startup Power requirements.

**Startup Contract Capacity** - The Customer shall contract for a definite amount of electrical capacity in kW sufficient to meet the maximum Startup Power requirements that the Company is expected to supply.

**Startup Duration** - The Customer shall contract for a definite number of hours sufficient to meet the maximum period of time for which the Company is expected to supply Startup Power.

(Cont'd on Sheet No. 26-2)

DATE OF ISSUE: July 10, 2015


DATE EFFECTIVE: Service Rendered On And After June 30, 2015

ISSUED BY: JOHN A. ROGNESS III 

TITLE: Director Regulatory Services

By Authority Of An Order By The Public Service Commission

In Case No. 2014-00396 Dated June 22, 2015

<b>KENTUCKY PUBLIC SERVICE COMMISSION</b>
<b>JEFF R. DEROUEN EXECUTIVE DIRECTOR</b>
TARIFF BRANCH

EFFECTIVE <b>6/30/2015</b> PURSUANT TO 807 KAR 5:011 SECTION 9 (1)

**TARIFF N.U.G. (Cont'd)  
(Non-Utility Generator)**

**STARTUP POWER SERVICE. (cont'd)**

**Startup Duration** – The Customer shall contract for a definite number of hours sufficient to meet the maximum period of time for which the Company is expected to supply Startup Power.

**Startup Frequency** – The Customer shall contract for a definite number of startup events sufficient to meet the maximum number of times per year that the Company is expected to supply Startup Power.

**Other Startup Characteristics** – The customer shall provide to the Company other information regarding the customer's Startup Power requirements, including, but not limited to, anticipated time-of-use and seasonal characteristics.

**Notification Requirement** - Whenever Startup Power is needed, the Customer shall provide advance notice to the Company.

Upon receipt of a request from the Customer for Startup Power Service under the terms of this tariff, the Company will provide the Customer a written offer containing the Notification Requirement, generation, transmission and distribution rates (including demand and energy charges) and related terms and conditions of service under which service will be provided by the Company. Such offer shall be based upon the Startup Contract Capacity, Startup Duration, Startup Frequency, and Other Startup Characteristics as specified by the customer. In no event shall the rates be less than the sum of the Tariff I.G.S. Energy Charge, the Fuel Adjustment Clause, the System Sales Clause, the Demand-Side Management Adjustment Clause, Asset Transfer Rider, Big Sandy Retirement Rider, Big Sandy I Operation Rider, Purchase Power Rider, KY Economic Development Surcharge, Environmental Surcharge, and the Capacity Charge.

If the parties reach an agreement based upon the offer provided to the customer by the Company, a contract shall be executed that provides full disclosure of all rates, terms and conditions of service under this tariff, and any and all agreements related thereto.


**DELAYED PAYMENT CHARGE.**

This tariff is due and payable in full on or before the due date stated on the bill. On all accounts not so paid, an additional charge of 5% of the unpaid balance will be made.

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DATE OF ISSUE: July 10, 2015


DATE EFFECTIVE: Service Rendered On And After June 30, 2015

ISSUED BY: JOHN A. ROGNESS III 

TITLE: Director Regulatory Services

By Authority Of an Order of the Public Service Commission

In Case No. 2014-00396 Dated June 22, 2015

<b>KENTUCKY PUBLIC SERVICE COMMISSION</b>
<b>JEFF R. DEROUEN EXECUTIVE DIRECTOR</b>
TARIFF BRANCH  
EFFECTIVE <b>6/30/2015</b> PURSUANT TO 807 KAR 5:011 SECTION 9 (1)

**TARIFF N.U.G. (Cont'd)**  
**(Non-Utility Generator)**

**MONTHLY BILLING DEMAND.**

The monthly billing demand in kW shall be taken each month as the highest single 15-minute integrated peak in kW as registered by a demand meter or indicator, less the Station Contract Capacity. The monthly billing demand so established shall in no event be less than the greater of (a) the Startup Contract Capacity or b) the customer's highest previously established monthly billing demand during the past 11 months.

**MONTHLY BILLING ENERGY.**

Interval billing energy shall be measured each 15-minute interval of the month as the total KWH registered by an energy meter or meters less the quotient of the Station Contract Capacity and four (4). In no event shall the interval billing energy be less than zero (0). Monthly billing energy shall be the sum of the interval billing energy for all intervals of the billing month.

**TRANSMISSION SERVICE.**

**Transmission Provider** – The entity providing transmission service to customers in the Company's service territory. Such entity may be the Company or a regional transmission entity.

Prior to taking service under this tariff, the Customer must have a fully executed Interconnection and Operation Agreement with the Company and/or the Transmission Provider or an unexecuted agreement filed with the Federal Energy Regulatory Commission under applicable procedures.

Should the Transmission Provider implement charges for Transmission Congestion, the Company shall provide 30 days written notice to the customer. Upon the expiration of such notice period, should the customer's use of Startup Power result in any charges for Transmission Congestion from the Transmission Provider, such charges, including any applicable taxes or assessments, shall be paid by or passed through to the customer without markup. Transmission Congestion is the condition that exists when market participants seek to dispatch in a pattern that would result in power flows that cannot be physically accommodated by the system.

**TERM OF CONTRACT.**

Contracts under this tariff will be made for an initial period of not less than one year and shall remain in effect thereafter until either party shall give at least 6 months' written notice to the other of the intention to terminate the contract. The Company reserves the right to require initial contracts for periods greater than one year.

A new initial contract period will not be required for existing customers who change their contract requirements after the original initial period unless new or additional facilities are required.

The Company may not be required to supply capacity in excess of that contracted for except by mutual agreement. Contracts will be made in multiples of 100 kW.

**SPECIAL TERMS AND CONDITIONS.**


This tariff is subject to the Company's Terms and Conditions of Service.

This tariff shall not obligate the Company to purchase or pay for any capacity or energy produced by the Customer's generator.

Customers desiring to provide Startup and Station Power from commonly owned generation facilities that are not located on the site of the customer's generator (remote self-supply), shall take service under the terms and conditions contained within the applicable Open Access Transmission Tariff as filed with and accepted by the Federal Energy Regulatory Commission.

DATE OF ISSUE: July 10, 2015


DATE EFFECTIVE: Service Rendered On And After June 30, 2015

ISSUED BY: JOHN A. ROGNESS III 

TITLE: Director Regulatory Services

By Authority Of Order By The Public Service Commission

In Case No. 2014-00396 Dated June 22, 2015

<b>KENTUCKY PUBLIC SERVICE COMMISSION</b>
<b>JEFF R. DEROUEN EXECUTIVE DIRECTOR</b>
TARIFF BRANCH

EFFECTIVE <b>6/30/2015</b>
PURSUANT TO 807 KAR 5:011 SECTION 9 (1)

KENTUCKY POWER COMPANY

P.S.C. KY. NO. 10 1<sup>ST</sup> REVISED SHEET NO. 10- 1  
CANCELLING P.S.C. KY. NO. 10 ORIGINAL SHEET NO. 10- 1

**TARIFF I.G.S.**  
**(Industrial General Service)**

**AVAILABILITY OF SERVICE.**

Available for commercial and industrial customers with contract demands of at least 1,000 KW. Customers shall contract for a definite amount of electrical capacity in kilowatts, which shall be sufficient to meet normal maximum requirements.

**RATE.**

	<u>Secondary</u>	<u>Primary</u>	<u>Service Voltage Subtransmission</u>	<u>Transmission</u>
Tariff Code	356	358/370	359/371	360/372
Service Charge per month	\$ 276.00	\$ 276.00	\$ 794.00	\$ 1,353.00
Demand Charge per KW				
Of monthly on-peak billing demand	\$ 18.23	\$ 15.21	\$ 10.02	\$ 9.75
Of monthly off-peak billing demand	\$ 1.10	\$ 1.07	\$ 1.05	\$ 1.04
Energy Charge per KWH	3.242 ¢	3.126 ¢	3.090 ¢	3.052 ¢

RRRR

Reactive Demand Charge for each kilovar of maximum leading or lagging reactive demand in excess of 50 percent of the KW of monthly metered demand ..... \$0.69/ KVAR

For the purpose of this tariff, the on-peak billing period is defined as 7:00 AM to 9:00 PM for all weekdays, Monday through Friday. The off-peak billing period is defined as 9:00 PM to 7:00 AM for all weekdays and all hours of Saturday and Sunday.

**MINIMUM DEMAND CHARGE.**

The minimum demand charge shall be equal to the minimum billing demand times the following minimum demand rates:

<u>Secondary</u>	<u>Primary</u>	<u>Subtransmission</u>	<u>Transmission</u>
\$19.59/KW	\$16.53 /KW	\$11.32/KW	\$11.03/KW

The minimum billing demand shall be the greater of 60% of the contract capacity set forth on the contract for electric service or 60% of the highest billing demand, on-peak or off-peak, recorded during the previous eleven months.

**MINIMUM CHARGE.**

This tariff is subject to a minimum charge equal to the Service Charge plus the Minimum Demand Charge.

**FUEL ADJUSTMENT CLAUSE.**

Bills computed according to the rates set forth herein will be increased or decreased by a Fuel Adjustment Factor per KWH calculated in compliance with the Fuel Adjustment Clause contained in Sheet Nos. 5-1 and 5-2 of this Tariff Schedule.

**SYSTEM SALES CLAUSE.**

Bills computed according to the rates set forth herein will be increased or decreased by a System Sales Factor per KWH calculated in compliance with the System Sales Clause contained in Sheet Nos. 19-1 and 19-2 of this Tariff Schedule.

(Cont'd on Sheet No. 10-2)

DATE OF ISSUE: August 27, 2015

DATE EFFECTIVE: Bills Rendered On And After September 29, 2015

ISSUED BY: JOHN A. ROGNESS III

TITLE: Director Regulatory Services

By authority of an Order by the Public Service Commission

In Case No. 2014-00450 Dated August 11, 2015

<b>KENTUCKY PUBLIC SERVICE COMMISSION</b>
<b>JEFF R. DEROUEN EXECUTIVE DIRECTOR</b>
TARIFF BRANCH
<i>Brent Kirtley</i>
EFFECTIVE <b>9/29/2015</b> PURSUANT TO 807 KAR 5.011 SECTION 9 (1)

KENTUCKY POWER COMPANY

P.S.C. KY. NO. 10 ORIGINAL SHEET NO. 10-2  
CANCELLING P.S.C. KY. NO. 10 \_\_\_\_\_ SHEET NO. 10-2

**TARIFF I.G.S.**  
**(Industrial General Service)**

**DEMAND-SIDE MANAGEMENT ADJUSTMENT CLAUSE.**

Bills computed according to the rates set forth herein will be increased or decreased by a Demand-Side Management Adjustment Clause Factor per KWH calculated in compliance with the Demand-Side Management Adjustment Clause contained in Sheet Nos. 22-1 through 22-15 of this Tariff Schedule, unless the customer is an industrial who has elected to opt-out in accordance with the terms pursuant to the Commission's Order in Case No. 95-427.

**ASSET TRANSFER RIDER.**

Bills computed according to the rates set forth herein will be increased or decreased by an Asset Transfer Adjustment Factor based on a percent of revenue in compliance with the Asset Transfer Rider contained in Sheet No. 36-1 through 36-2 of this Tariff Schedule. The Asset Transfer Adjustment Factor will be applied to bills until such time as the pro rata amount (computed on a 365-day annual basis) authorized to be recovered via Tariff A.T.R. in the Stipulation and Settlement Agreement, approved as modified by the Commission by its order dated October 7, 2013 in Case No. 2012-00578, has been recovered.

**BIG SANDY RETIREMENT RIDER.**

Bills computed according to the rates set forth herein will be increased or decreased by a Big Sandy Retirement Rider Adjustment Factor based on a percent of revenue in compliance with the Big Sandy Retirement Rider contained in Sheet No. 38-1 through 38-2 of this Tariff Schedule.

**BIG SANDY I OPERATION RIDER.**

Bills computed according to the rates set forth herein will be increased or decreased by a Big Sandy I Operation Rider Adjustment Factor per kW and/or kWh calculated in compliance with the Big Sandy I Operation Rider contained in Sheet Nos. 39-1 through 39-2 of this Tariff Schedule.

**PURCHASE POWER ADJUSTMENT.**

Bills computed according to the rates set forth herein will be increased or decreased by a Purchase Power Adjustment Factor based on a percent of revenue in compliance with the Purchase Power Adjustment contained in Sheet No. 35-1 of this Tariff Schedule.

**ENVIRONMENTAL SURCHARGE.**

Bills computed according to the rates set forth herein will be increased or decreased by an Environmental Surcharge adjustment based on a percent of revenue in compliance with the Environmental Surcharge contained in Sheet Nos. 29-1 through 29-7 of the Tariff Schedule.

**CAPACITY CHARGE.**

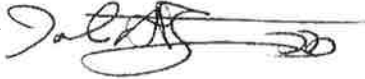
Bills computed according to the rates set forth herein will be increased by a Capacity Charge Factor per KWH calculated in compliance with the Capacity Charge Tariff contained in Sheet No. 28-1 through 28-2 of this Tariff Schedule.

(Cont'd on Sheet No. 10-3)

DATE OF ISSUE: July 10, 2015

DATE EFFECTIVE: Service Rendered On And After June 30, 2015

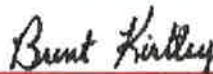
ISSUED BY: JOHN A. ROGNESS III



TITLE: Director Regulatory Services

By Authority Of An Order By The Public Service Commission

In Case No. 2014-00396 Dated June 22, 2015

<b>KENTUCKY</b>
<b>PUBLIC SERVICE COMMISSION</b>
<b>JEFF R. DEROUEN</b> <b>EXECUTIVE DIRECTOR</b>
<b>TARIFF BRANCH</b>

<b>EFFECTIVE</b>
<b>6/30/2015</b>
<b>PURSUANT TO 807 KAR 5.011 SECTION 9 (1)</b>

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KENTUCKY POWER COMPANY

P.S.C. KY. NO. 10 ORIGINAL SHEET NO. 10-3  
CANCELLING P.S.C. KY. NO. 10 SHEET NO. 10-3

**TARIFF I.G.S.**  
**(Industrial General Service)**

**KENTUCKY ECONOMIC DEVELOPMENT SURCHARGE.**

Applicable to all customers. Bills computed according to the rates set forth herein shall be increased by a KEDS charge of \$0.15 per month and shall be shown on the customers' bills as a separate line item. The KEDS charge will be applied to all customer electric bills rendered during the billing cycles commencing July 2015 and continue until otherwise directed by the Public Service Commission.

**DELAYED PAYMENT CHARGE.**

Bills under this tariff are due and payable within fifteen (15) days of the mailing date. On all accounts not paid in full by the next billing date, an additional charge of 5% of the unpaid portion will be made.

**METERED VOLTAGE.**

The rates set forth in this tariff are based upon the delivery and measurement of energy at the same voltage, thus measurement will be made at or compensated to the delivery voltage. At the sole discretion of the Company, such compensation may be achieved through the use of loss compensating equipment, the use of formulas to calculate losses or the application of multipliers to the metered quantities. In such cases, the metered KWH and KVA values will be adjusted for billing purposes. If the Company elects to adjust KWH and KW based on multipliers, the adjustment shall be in accordance with the following:

- (1) Measurements taken at the low-side of a Customer-owned transformer will be multiplied by 1.01.
- (2) Measurements taken at the high-side of a Company-owned transformer will be multiplied by 0.98.

**MONTHLY BILLING DEMAND.**

The monthly on-peak and off-peak billing demands in KW shall be taken each month as the highest single 15-minute integrated peak in KW as registered by a demand meter during the on-peak and off-peak billing periods, respectively.

The reactive demand in KVARs shall be taken each month as the highest single 15-minute integrated peak in KVARs as registered during the month by a demand meter or indicator.

(Cont'd on Sheet No. 10-4)

DATE OF ISSUE: July 10, 2015

DATE EFFECTIVE: Service Rendered On And After June 30, 2015


ISSUED BY: JOHN A. ROGNESS III



TITLE: Director Regulatory Services

By Authority Of An Order By The Public Service Commission

In Case No. 2014-00396 Dated June 22, 2015

<b>KENTUCKY PUBLIC SERVICE COMMISSION</b>
<b>JEFF R. DEROUEN EXECUTIVE DIRECTOR</b>
<b>TARIFF BRANCH</b>

<b>EFFECTIVE 6/30/2015 PURSUANT TO 807 KAR 5:011 SECTION 9 (1)</b>

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KENTUCKY POWER COMPANY

P.S.C. KY. NO. 10 ORIGINAL SHEET NO. 10-4  
CANCELLING P.S.C. KY. NO. 10 SHEET NO. 10-4

**TARIFF I.G.S.  
(Industrial General Service)**

**TERM OF CONTRACT.**

Contracts under this tariff will be made for an initial period of not less than two years and shall remain in effect thereafter until either party shall give at least 12 months' written notice to the other of the intention to terminate the contract. The Company reserves the right to require initial contracts for periods greater than two years.

A new initial contract period will not be required for existing customers who change their contract requirements after the original initial period unless new or additional facilities are required.

**CONTRACT CAPACITY**

The Customer shall set forth the amount of capacity contracted for ("the contract capacity") in an amount equal to or greater than 1,000 KW in multiples of 100 KW. The Company is not required to supply capacity in excess of such contract capacity except with express written consent of the Company.

**SPECIAL TERMS AND CONDITIONS.**

This tariff is subject to the Company's Terms and Conditions of Service.

This tariff is available for resale service to mining and industrial Customers who furnish service to Customer-owned camps or villages where living quarters are rented to employees and where the Customer purchases power at a single point for both the power and camp requirements.

This tariff is also available to Customers having other sources of energy supply, but who desire to purchase standby or back-up electric service from the Company. Where such conditions exist the Customer shall contract for the maximum amount of demand in KW which the Company might be required to furnish, but not less than 1,000 KW. The Company shall not be obligated to supply demands in excess of that contracted capacity. Where service is supplied under the provisions of this paragraph, the billing demand each month shall be the highest determined for the current and previous two billing periods, and the minimum charge shall be as set forth under paragraph "Minimum Charge" above.

A Customer's plant is considered as one or more buildings, which are served by a single electrical distribution system provided and operated by the Customer. When the size of the Customer's load necessitates the delivery of energy to the Customer's plant over more than one circuit, the Company may elect to connect its circuits to different points on the Customer's system irrespective of contrary provisions in Terms and Conditions of Service.

Customer with PURPA Section 210 qualifying cogeneration and/or small power production facilities shall take service under Tariff COGEN/SPP II or by special agreement with the Company.

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DATE OF ISSUE: July 10, 2015

DATE EFFECTIVE: Service Rendered On And After June 30, 2015


ISSUED BY: JOHN A. ROGNESS III



TITLE: Director Regulatory Services

By Authority Of An Order By The Public Service Commission

In Case No. 2014-00396 Dated June 22, 2015

<b>KENTUCKY PUBLIC SERVICE COMMISSION</b>
<b>JEFF R. DEROUEN EXECUTIVE DIRECTOR</b>
TARIFF BRANCH

EFFECTIVE <b>6/30/2015</b> PURSUANT TO 807 KAR 5.011 SECTION 9 (1)

**Audra Cannon**

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**From:** George Scienski  
**Sent:** Tuesday, June 27, 2017 3:43 PM  
**To:** Ken Borders  
**Cc:** Greene, Steve  
**Subject:** Spam: RE: Kentucky Power - Question about station netting - RiversideGeneration-2  
**Attachments:** 170627-RGC-KPC Riverside-Station Power Netting under Tariff N.U.G..pdf

Ken:

Riverside has spent some time reviewing your email and researching the issue of station service netting. For the reasons detailed within the attached, we believe that we qualify for the remote self-supply provisions described in the tariff and summarized in your email. Please review the attached (hardcopy sent via FedEx). We look forward to discussing and resolving the matter.

Thanks,

George

-----  
George S. Scienski  
LS Power Development, LLC  
One Tower Center, 21st Floor  
East Brunswick, NJ 08816  
office phone (NJ): 732-867-5860  
office phone (SCES): 254-896-4218  
cell phone: 732-354-7641  
fax: 732-249-7290  
gscienski@lspower.com

-----Original Message-----

**From:** Ken Borders [mailto:klborders@aep.com]  
**Sent:** Friday, March 17, 2017 3:28 PM  
**To:** George Scienski  
**Subject:** Kentucky Power - Question about station netting - Riverside Generation

Mr. Scienski,



A few weeks ago you inquired about the possibility of "netting" station power in order to obtain power at a wholesale rate for the Riverside facility in Lawrence County, Kentucky. Kentucky Power offers the response to your question below.

As an independent power producer within Kentucky Power Company's retail service territory, the Riverside generating facility is required to obtain station power at retail from Kentucky Power under the PSC-approved Tariff N.U.G. (Non-Utility Generator), as Riverside has done for many years. Tariff N.U.G., which is attached, does not permit an IPP to obtain station power at wholesale under the PJM Open Access Transmission Tariff unless the IPP can "provide Startup and Station Power from commonly owned generation facilities that are not located on the site of the customer's generator (remote self-supply)." Our understanding is that there are no other "commonly owned generation facilities" in the same corporate entity as the Riverside generating facility, and therefore Riverside is not eligible for remote self-supply and may not obtain station power at wholesale under the PJM tariff. Rather, Riverside must continue to obtain station power at retail from Kentucky Power under Tariff N.U.G.

Please note the Station Contract Capacity referred to in Tariff N.U.G. is supplied under the Industrial General Service tariff 360.

Tariff N.U.G. is attached along with Tariff I.G.S. (Industrial General Service). Should you have additional questions or need additional information please feel free to contact me.

Sincerely,

Ken Borders - Customer Service Engineer  
Kentucky Power Company  
12333 Kevin Avenue  
Ashland, KY 41102  
Phone (606) 929-1453  
klborders@aep.com

**Riverside Generating Company, LLC**

25038 US Hwy 23  
Catlettsburg, Kentucky 41129  
(606) 686-1311

June 27, 2017

VIA EMAIL (klborders@aep.com)

Mr. Ken Borders  
Customer Service Engineer  
Kentucky Power Company  
12333 Kevin Avenue  
Ashland, KY 41102

RE: Riverside Generation / Station Power Netting under Tariff N.U.G.

Dear Mr. Borders:

Reference is made to your email of March 17, 2017,<sup>1</sup> in which you provided initial guidance regarding the terms of Kentucky Power Company's Tariff N.U.G. and its applicability to the electric service received by Riverside Generating Company, LLC ("Riverside"), at its facilities located in Lawrence County, Kentucky. I appreciate your invitation to further discuss this matter and hope I can provide additional clarity with respect to the relevant facts.

Riverside's power production facilities in Kentucky include a total of five (5) generating units located at two (2) proximate, though distinct, generation sites. Riverside's Units 1-3, which are identified and classified by PJM Interconnection, LLC ("PJM"), as comprising the "Zelda" site, are located on real estate originally acquired in the year 2000 and were placed into operation in the year 2001. Riverside's Units 4 and 5, which are identified and classified by PJM as comprising the "Foothills" site, are located on real estate originally acquired in the year 2001 and were placed into operation in the year 2002. Riverside wholly owns both sites and each of the units found upon them.

As you are aware, Riverside is presently exploring the options available to it for satisfying its station power needs at both the Zelda and Foothills sites. Because both sites are interconnected with the wholesale transmission grid and consistently produce significantly more energy than consumed for their operation, Riverside is examining with particularity its ability to "net" its station power in accordance with the terms of PJM's Open Access Transmission Tariff. At this time, and in light of the relevant facts elucidated herein, Riverside continues to believe this avenue represents the most sensible solution to the situation under scrutiny.

In your email of March 17<sup>th</sup>, you indicated that a "netting" arrangement like that summarized above would not be available to Riverside under the terms of Kentucky Power's existing retail Tariff N.U.G. which states, in relevant part, that "[c]ustomers desiring to provide Startup and Station Power from commonly owned generation facilities that are not located on the

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<sup>1</sup> For your reference, a copy of this email is included herewith.

Mr. Ken Borders  
June 27, 2017  
Page Two

site of the customer's generator (remote self-supply) shall take service under the terms and conditions contained within the applicable Open Access Transmission Tariff as filed with and accepted by the Federal Energy Regulatory Commission." In reaching your initial conclusion, you expressed your understanding that Riverside has just one (1) generating site in its portfolio, and thus "is not eligible for remote self-supply..." The relevant facts clearly show, however, that Riverside's Zelda and Foothills generators are located on separate and distinct "sites" for purposes of complying with the Tariff N.U.G. and the PJM Open Access Transmission Tariff.

As mentioned above, the Zelda site and the Foothills site sit upon unique parcels of real estate that were acquired at different times. While the two (2) sites share a common property line, that same border is marked by fencing and other barriers that provide apparent and actual partitioning. Each site is individually identified by PJM for various purposes and is uniquely reported to PJM. Each site is uniquely metered, has its own infrastructure and connections to the nearby Baker Switchyard. There is no cross feed/tie-breaker between the sites, no parasitic load, and no need for the respective units to operate in unison. Indeed, for nearly every relevant intent and purpose, the Zelda site and the Foothills site may as well be located ten, twenty, or even hundreds of miles from each other. Based on these facts, it is both logical and reasonable to conclude that Riverside's Units 1-3 are not located on the same "site" as Riverside's Units 4-5. Instead, these distinct sites house "commonly owned generation facilities" capable of remotely supplying station power to Riverside when necessary. Therefore, consistent with the Special Terms and Conditions of Kentucky Power's Tariff N.U.G., Riverside appears eligible to take its station power service under PJM's Open Access Transmission Tariff.

It is my hope that the additional detail provided in this correspondence will permit you to reconsider the earlier conclusion reflected in your March 17<sup>th</sup> email. Because Riverside remains committed to working with Kentucky Power to realize a fair and appropriate resolution of these issues, I would be happy to answer any questions or further confer at your convenience. In any event, I ask that you please confirm Kentucky Power's agreement with the discussion/conclusion contained herein on or before July 7, 2017.

Again, I appreciate your willingness to discuss this matter and look forward to your response.

Sincerely,



George Scienski

Attachment

**From:** [Ken Borders](#)  
**To:** [George Scienski](#)  
**Subject:** Kentucky Power - Question about station netting - Riverside Generation  
**Date:** Friday, March 17, 2017 3:27:47 PM  
**Attachments:** [2017 JAN 31 KPCO NUG TARIFF.pdf](#)  
[2015 SEP 29 INDUSTRIAL GENERAL SERVICE.pdf](#)

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Mr. Scienski,

A few weeks ago you inquired about the possibility of "netting" station power in order to obtain power at a wholesale rate for the Riverside facility in Lawrence County, Kentucky. Kentucky Power offers the response to your question below.

As an independent power producer within Kentucky Power Company's retail service territory, the Riverside generating facility is required to obtain station power at retail from Kentucky Power under the PSC-approved Tariff N.U.G. (Non-Utility Generator), as Riverside has done for many years. Tariff N.U.G., which is attached, does not permit an IPP to obtain station power at wholesale under the PJM Open Access Transmission Tariff unless the IPP can "provide Startup and Station Power from commonly owned generation facilities that are not located on the site of the customer's generator (remote self-supply)." Our understanding is that there are no other "commonly owned generation facilities" in the same corporate entity as the Riverside generating facility, and therefore Riverside is not eligible for remote self-supply and may not obtain station power at wholesale under the PJM tariff. Rather, Riverside must continue to obtain station power at retail from Kentucky Power under Tariff N.U.G.

Please note the Station Contract Capacity referred to in Tariff N.U.G. is supplied under the Industrial General Service tariff 360.

Tariff N.U.G. is attached along with Tariff I.G.S. (Industrial General Service). Should you have additional questions or need additional information please feel free to contact me.

Sincerely,

Ken Borders - Customer Service Engineer  
Kentucky Power Company  
12333 Kevin Avenue  
Ashland, KY 41102  
Phone (606) 929-1453  
[klborders@aep.com](mailto:klborders@aep.com)

**TARIFF N.U.G.  
(Non-Utility Generator)**

**AVAILABILITY OF SERVICE.**

This tariff is applicable to customers with generation facilities which have a total design capacity of over 1,000 kW that intends to schedule, deliver and sell the net electric output of the facility at wholesale, and who require Commissioning Power, Startup Power and/or Station Power service from the Company.

Service to any load that is electrically isolated from the Customer's generator shall be separately metered and provided in accordance with the generally available demand-metered tariff appropriate for such service to the Customer.

This tariff is not available for standby, backup, maintenance, or supplemental service for wholesale or retail loads served by customer's generator.

**DEFINITIONS.**

1. **Commissioning Power** - The electrical energy and capacity supplied to the customer prior to the commercial operation of the customer's generator, including initial construction and testing phases.
2. **Station Power** - The electrical energy and capacity supplied to the customer to serve the auxiliary loads at the customer's generation facilities, usually when the customer's generator is not operating. Station Power does not include Startup Power.
3. **Startup Power** - The electrical energy and capacity supplied to the customer following a planned or forced outage of the customer's generator for the purpose of returning the customer's generator to synchronous operation.

**COMMISSIONING POWER SERVICE.**

Customers requiring Commissioning Power shall take service under Tariff T.S. or by special agreement with the Company.

The Customer shall coordinate its construction and testing with the Company to ensure that the customer's operations do not cause any undue interference with the Company's obligations to provide service to its other customers or impose a burden on the Company's system or any system interconnected with the Company.

**STATION POWER SERVICE.**

Customers requiring Station Power shall take service under the generally available demand-metered tariff appropriate for the customer's Station Power requirements.

**Station Contract Capacity** - The Customer shall contract for a definite amount of electrical capacity in kW sufficient to meet the maximum Station Power requirements that the Company is expected to supply under the generally available demand-metered tariff appropriate for the customer.

**STARTUP POWER SERVICE.**

Customers requiring Startup Power have the option of contracting for such service under the terms of this tariff or under the generally available demand-metered tariff appropriate for the customer's Startup Power requirements.


**Startup Contract Capacity** - The Customer shall contract for a definite amount of electrical capacity in kW sufficient to meet the maximum Startup Power requirements that the Company is expected to supply.

**Startup Duration** - The Customer shall contract for a definite number of hours sufficient to meet the maximum period of time for which the Company is expected to supply Startup Power.

(Cont'd on Sheet No. 26-2)

DATE OF ISSUE: July 10, 2015


DATE EFFECTIVE: Service Rendered On And After June 30, 2015

ISSUED BY: JOHN A. ROGNES III 

TITLE: Director Regulatory Services

By Authority Of An Order By The Public Service Commission

In Case No. 2014-00396 Dated June 22, 2015

<b>KENTUCKY PUBLIC SERVICE COMMISSION</b>
<b>JEFF R. DEROUEN EXECUTIVE DIRECTOR</b>
TARIFF BRANCH

EFFECTIVE <b>6/30/2015</b> PURSUANT TO 807 KAR 5:011 SECTION 9 (1)

**TARIFF N.U.G. (Cont'd)**  
**(Non-Utility Generator)**

**STARTUP POWER SERVICE. (cont'd)**

**Startup Duration** – The Customer shall contract for a definite number of hours sufficient to meet the maximum period of time for which the Company is expected to supply Startup Power.

**Startup Frequency** – The Customer shall contract for a definite number of startup events sufficient to meet the maximum number of times per year that the Company is expected to supply Startup Power.

**Other Startup Characteristics** – The customer shall provide to the Company other information regarding the customer's Startup Power requirements, including, but not limited to, anticipated time-of-use and seasonal characteristics.

**Notification Requirement** - Whenever Startup Power is needed, the Customer shall provide advance notice to the Company.

Upon receipt of a request from the Customer for Startup Power Service under the terms of this tariff, the Company will provide the Customer a written offer containing the Notification Requirement, generation, transmission and distribution rates (including demand and energy charges) and related terms and conditions of service under which service will be provided by the Company. Such offer shall be based upon the Startup Contract Capacity, Startup Duration, Startup Frequency, and Other Startup Characteristics as specified by the customer. In no event shall the rates be less than the sum of the Tariff I.G.S. Energy Charge, the Fuel Adjustment Clause, the System Sales Clause, the Demand-Side Management Adjustment Clause, Asset Transfer Rider, Big Sandy Retirement Rider, Big Sandy I Operation Rider, Purchase Power Rider, KY Economic Development Surcharge, Environmental Surcharge, and the Capacity Charge.

If the parties reach an agreement based upon the offer provided to the customer by the Company, a contract shall be executed that provides full disclosure of all rates, terms and conditions of service under this tariff, and any and all agreements related thereto.

**DELAYED PAYMENT CHARGE.**

This tariff is due and payable in full on or before the due date stated on the bill. On all accounts not so paid, an additional charge of 5% of the unpaid balance will be made.

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DATE OF ISSUE: July 10, 2015

DATE EFFECTIVE: Service Rendered On And After June 30, 2015


ISSUED BY: JOHN A. ROGNESS III



TITLE: Director Regulatory Services

By Authority Of an Order of the Public Service Commission

In Case No. 2014-00396 Dated June 22, 2015

<b>KENTUCKY PUBLIC SERVICE COMMISSION</b>
<b>JEFF R. DEROUEN EXECUTIVE DIRECTOR</b>
<b>TARIFF BRANCH</b>

<b>EFFECTIVE 6/30/2015</b>
<b>PURSUANT TO 807 KAR 5:011 SECTION 9 (1)</b>

**TARIFF N.U.G. (Cont'd)**  
**(Non-Utility Generator)**

**MONTHLY BILLING DEMAND.**

The monthly billing demand in kW shall be taken each month as the highest single 15-minute integrated peak in kW as registered by a demand meter or indicator, less the Station Contract Capacity. The monthly billing demand so established shall in no event be less than the greater of (a) the Startup Contract Capacity or b) the customer's highest previously established monthly billing demand during the past 11 months.

**MONTHLY BILLING ENERGY.**

Interval billing energy shall be measured each 15-minute interval of the month as the total KWH registered by an energy meter or meters less the quotient of the Station Contract Capacity and four (4). In no event shall the interval billing energy be less than zero (0). Monthly billing energy shall be the sum of the interval billing energy for all intervals of the billing month.

**TRANSMISSION SERVICE.**

**Transmission Provider** – The entity providing transmission service to customers in the Company's service territory. Such entity may be the Company or a regional transmission entity.

Prior to taking service under this tariff, the Customer must have a fully executed Interconnection and Operation Agreement with the Company and/or the Transmission Provider or an unexecuted agreement filed with the Federal Energy Regulatory Commission under applicable procedures.

Should the Transmission Provider implement charges for Transmission Congestion, the Company shall provide 30 days written notice to the customer. Upon the expiration of such notice period, should the customer's use of Startup Power result in any charges for Transmission Congestion from the Transmission Provider, such charges, including any applicable taxes or assessments, shall be paid by or passed through to the customer without markup. Transmission Congestion is the condition that exists when market participants seek to dispatch in a pattern that would result in power flows that cannot be physically accommodated by the system.

**TERM OF CONTRACT.**

Contracts under this tariff will be made for an initial period of not less than one year and shall remain in effect thereafter until either party shall give at least 6 months' written notice to the other of the intention to terminate the contract. The Company reserves the right to require initial contracts for periods greater than one year.

A new initial contract period will not be required for existing customers who change their contract requirements after the original initial period unless new or additional facilities are required.

The Company may not be required to supply capacity in excess of that contracted for except by mutual agreement. Contracts will be made in multiples of 100 kW.

**SPECIAL TERMS AND CONDITIONS.**

This tariff is subject to the Company's Terms and Conditions of Service.

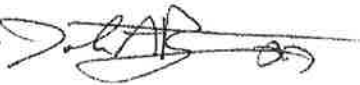
This tariff shall not obligate the Company to purchase or pay for any capacity or energy produced by the Customer's generator.

Customers desiring to provide Startup and Station Power from commonly owned generation facilities that are not located on the site of the customer's generator (remote self-supply), shall take service under the terms and conditions contained within the applicable Open Access Transmission Tariff as filed with and accepted by the Federal Energy Regulatory Commission.

DATE OF ISSUE: July 10, 2015

DATE EFFECTIVE: Service Rendered On And After June 30, 2015


ISSUED BY: JOHN A. ROGNESS III



TITLE: Director Regulatory Services

By Authority Of Order By The Public Service Commission

In Case No. 2014-00396 Dated June 22, 2015

<b>KENTUCKY PUBLIC SERVICE COMMISSION</b>
<b>JEFF R. DEROUEN EXECUTIVE DIRECTOR</b>
TARIFF BRANCH

EFFECTIVE <b>6/30/2015</b>
PURSUANT TO 807 KAR 5:011 SECTION 9 (1)

KENTUCKY POWER COMPANY

P.S.C. KY. NO. 10 1<sup>ST</sup> REVISED SHEET NO. 10-1  
CANCELLING P.S.C. KY. NO. 10 ORIGINAL SHEET NO. 10-1

**TARIFF I.G.S.**  
(Industrial General Service)

**AVAILABILITY OF SERVICE.**

Available for commercial and industrial customers with contract demands of at least 1,000 KW. Customers shall contract for a definite amount of electrical capacity in kilowatts, which shall be sufficient to meet normal maximum requirements.

**RATE.**

	<u>Secondary</u>	<u>Primary</u>	<u>Service Voltage Subtransmission</u>	<u>Transmission</u>
Tariff Code	356	358/370	359/371	360/372
Service Charge per month	\$ 276.00	\$ 276.00	\$ 794.00	\$ 1,353.00
Demand Charge per KW				
Of monthly on-peak billing demand	\$ 18.23	\$ 15.21	\$ 10.02	\$ 9.75
Of monthly off-peak billing demand	\$ 1.10	\$ 1.07	\$ 1.05	\$ 1.04
Energy Charge per KWH	3.242 ¢	3.126 ¢	3.090 ¢	3.052 ¢

RRRR

Reactive Demand Charge for each kilovar of maximum leading or lagging reactive demand in excess of 50 percent of the KW of monthly metered demand ..... \$0.69/ KVAR

For the purpose of this tariff, the on-peak billing period is defined as 7:00 AM to 9:00 PM for all weekdays, Monday through Friday. The off-peak billing period is defined as 9:00 PM to 7:00 AM for all weekdays and all hours of Saturday and Sunday.

**MINIMUM DEMAND CHARGE.**

The minimum demand charge shall be equal to the minimum billing demand times the following minimum demand rates:

<u>Secondary</u>	<u>Primary</u>	<u>Subtransmission</u>	<u>Transmission</u>
\$19.59/KW	\$16.53 /KW	\$11.32/KW	\$11.03/KW

The minimum billing demand shall be the greater of 60% of the contract capacity set forth on the contract for electric service or 60% of the highest billing demand, on-peak or off-peak, recorded during the previous eleven months.

**MINIMUM CHARGE.**

This tariff is subject to a minimum charge equal to the Service Charge plus the Minimum Demand Charge.

**FUEL ADJUSTMENT CLAUSE.**

Bills computed according to the rates set forth herein will be increased or decreased by a Fuel Adjustment Factor per KWH calculated in compliance with the Fuel Adjustment Clause contained in Sheet Nos. 5-1 and 5-2 of this Tariff Schedule.

**SYSTEM SALES CLAUSE.**

Bills computed according to the rates set forth herein will be increased or decreased by a System Sales Factor per KWH calculated in compliance with the System Sales Clause contained in Sheet Nos. 19-1 and 19-2 of this Tariff Schedule.

(Cont'd on Sheet No. 10-2)

DATE OF ISSUE: August 27, 2015

DATE EFFECTIVE: Bills Rendered On And After September 29, 2015

ISSUED BY: JOHN A. ROGNESS III



TITLE: Director Regulatory Services

By authority of an Order by the Public Service Commission

In Case No. 2014-00450 Dated August 11, 2015

**KENTUCKY  
PUBLIC SERVICE COMMISSION**

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**JEFF R. DEROUEN  
EXECUTIVE DIRECTOR**

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TARIFF BRANCH

*Brent Kirtley*

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EFFECTIVE  
**9/29/2015**  
PURSUANT TO 807 KAR 5:011 SECTION 9 (1)



KENTUCKY POWER COMPANY

P.S.C. KY. NO. 10 ORIGINAL SHEET NO. 10-2  
CANCELLING P.S.C. KY. NO. 10 SHEET NO. 10-2

**TARIFF I.G.S.**  
**(Industrial General Service)**

**DEMAND-SIDE MANAGEMENT ADJUSTMENT CLAUSE.**

Bills computed according to the rates set forth herein will be increased or decreased by a Demand-Side Management Adjustment Clause Factor per KWH calculated in compliance with the Demand-Side Management Adjustment Clause contained in Sheet Nos. 22-1 through 22-15 of this Tariff Schedule, unless the customer is an industrial who has elected to opt-out in accordance with the terms pursuant to the Commission's Order in Case No. 95-427.

**ASSET TRANSFER RIDER.**

Bills computed according to the rates set forth herein will be increased or decreased by an Asset Transfer Adjustment Factor based on a percent of revenue in compliance with the Asset Transfer Rider contained in Sheet No. 36-1 through 36-2 of this Tariff Schedule. The Asset Transfer Adjustment Factor will be applied to bills until such time as the pro rata amount (computed on a 365-day annual basis) authorized to be recovered via Tariff A.T.R. in the Stipulation and Settlement Agreement, approved as modified by the Commission by its order dated October 7, 2013 in Case No. 2012-00578, has been recovered.

**BIG SANDY RETIREMENT RIDER.**

Bills computed according to the rates set forth herein will be increased or decreased by a Big Sandy Retirement Rider Adjustment Factor based on a percent of revenue in compliance with the Big Sandy Retirement Rider contained in Sheet No. 38-1 through 38-2 of this Tariff Schedule.

**BIG SANDY I OPERATION RIDER.**

Bills computed according to the rates set forth herein will be increased or decreased by a Big Sandy I Operation Rider Adjustment Factor per kW and/or kWh calculated in compliance with the Big Sandy I Operation Rider contained in Sheet Nos. 39-1 through 39-2 of this Tariff Schedule.

**PURCHASE POWER ADJUSTMENT.**

Bills computed according to the rates set forth herein will be increased or decreased by a Purchase Power Adjustment Factor based on a percent of revenue in compliance with the Purchase Power Adjustment contained in Sheet No. 35-1 of this Tariff Schedule.

**ENVIRONMENTAL SURCHARGE.**

Bills computed according to the rates set forth herein will be increased or decreased by an Environmental Surcharge adjustment based on a percent of revenue in compliance with the Environmental Surcharge contained in Sheet Nos. 29-1 through 29-7 of the Tariff Schedule.

**CAPACITY CHARGE.**

Bills computed according to the rates set forth herein will be increased by a Capacity Charge Factor per KWH calculated in compliance with the Capacity Charge Tariff contained in Sheet No. 28-1 through 28-2 of this Tariff Schedule.

(Cont'd on Sheet No. 10-3)

DATE OF ISSUE: July 10, 2015

DATE EFFECTIVE: Service Rendered On And After June 30, 2015


ISSUED BY: JOHN A. ROGNESS III



TITLE: Director Regulatory Services

By Authority Of An Order By The Public Service Commission

In Case No. 2014-00396 Dated June 22, 2015

<b>KENTUCKY</b>
<b>PUBLIC SERVICE COMMISSION</b>
<b>JEFF R. DEROUEN</b> <b>EXECUTIVE DIRECTOR</b>
TARIFF BRANCH

EFFECTIVE
<b>6/30/2015</b>
PURSUANT TO 807 KAR 5:011 SECTION 9 (1)

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KENTUCKY POWER COMPANY

P.S.C. KY. NO. 10 ORIGINAL SHEET NO. 10-3  
CANCELLING P.S.C. KY. NO. 10 SHEET NO. 10-3

**TARIFF I.G.S.**  
**(Industrial General Service)**

**KENTUCKY ECONOMIC DEVELOPMENT SURCHARGE.**

Applicable to all customers. Bills computed according to the rates set forth herein shall be increased by a KEDS charge of \$0.15 per month and shall be shown on the customers' bills as a separate line item. The KEDS charge will be applied to all customer electric bills rendered during the billing cycles commencing July 2015 and continue until otherwise directed by the Public Service Commission.

**DELAYED PAYMENT CHARGE.**

Bills under this tariff are due and payable within fifteen (15) days of the mailing date. On all accounts not paid in full by the next billing date, an additional charge of 5% of the unpaid portion will be made.

**METERED VOLTAGE.**

The rates set forth in this tariff are based upon the delivery and measurement of energy at the same voltage, thus measurement will be made at or compensated to the delivery voltage. At the sole discretion of the Company, such compensation may be achieved through the use of loss compensating equipment, the use of formulas to calculate losses or the application of multipliers to the metered quantities. In such cases, the metered KWII and KVA values will be adjusted for billing purposes. If the Company elects to adjust KWH and KW based on multipliers, the adjustment shall be in accordance with the following:

- (1) Measurements taken at the low-side of a Customer-owned transformer will be multiplied by 1.01.
- (2) Measurements taken at the high-side of a Company-owned transformer will be multiplied by 0.98.

**MONTHLY BILLING DEMAND.**

The monthly on-peak and off-peak billing demands in KW shall be taken each month as the highest single 15-minute integrated peak in KW as registered by a demand meter during the on-peak and off-peak billing periods, respectively.

The reactive demand in KVARs shall be taken each month as the highest single 15-minute integrated peak in KVARs as registered during the month by a demand meter or indicator.

(Cont'd on Sheet No. 10-4)

DATE OF ISSUE: July 10, 2015

DATE EFFECTIVE: Service Rendered On And After June 30, 2015

ISSUED BY: JOHN A. ROGNESS III



TITLE: Director Regulatory Services

By Authority Of An Order By The Public Service Commission

In Case No. 2014-00396 Dated June 22, 2015

<b>KENTUCKY PUBLIC SERVICE COMMISSION</b>
<b>JEFF R. DEROUEN EXECUTIVE DIRECTOR</b>
<b>TARIFF BRANCH</b>
<i>Brent Kirtley</i>
<b>EFFECTIVE 6/30/2015</b>
<b>PURSUANT TO 807 KAR 5:011 SECTION 9 (1)</b>

N  
N

KENTUCKY POWER COMPANY

P.S.C. KY. NO. 10 ORIGINAL SHEET NO. 10-4  
CANCELLING P.S.C. KY. NO. 10 \_\_\_\_\_ SHEET NO. 10-4

**TARIFF I.G.S.  
(Industrial General Service)**

**TERM OF CONTRACT.**

Contracts under this tariff will be made for an initial period of not less than two years and shall remain in effect thereafter until either party shall give at least 12 months' written notice to the other of the intention to terminate the contract. The Company reserves the right to require initial contracts for periods greater than two years.

A new initial contract period will not be required for existing customers who change their contract requirements after the original initial period unless new or additional facilities are required.

**CONTRACT CAPACITY**

The Customer shall set forth the amount of capacity contracted for ("the contract capacity") in an amount equal to or greater than 1,000 KW in multiples of 100 KW. The Company is not required to supply capacity in excess of such contract capacity except with express written consent of the Company.

**SPECIAL TERMS AND CONDITIONS.**

This tariff is subject to the Company's Terms and Conditions of Service.

This tariff is available for resale service to mining and industrial Customers who furnish service to Customer-owned camps or villages where living quarters are rented to employees and where the Customer purchases power at a single point for both the power and camp requirements.

This tariff is also available to Customers having other sources of energy supply, but who desire to purchase standby or back-up electric service from the Company. Where such conditions exist the Customer shall contract for the maximum amount of demand in KW which the Company might be required to furnish, but not less than 1,000 KW. The Company shall not be obligated to supply demands in excess of that contracted capacity. Where service is supplied under the provisions of this paragraph, the billing demand each month shall be the highest determined for the current and previous two billing periods, and the minimum charge shall be as set forth under paragraph "Minimum Charge" above.

A Customer's plant is considered as one or more buildings, which are served by a single electrical distribution system provided and operated by the Customer. When the size of the Customer's load necessitates the delivery of energy to the Customer's plant over more than one circuit, the Company may elect to connect its circuits to different points on the Customer's system irrespective of contrary provisions in Terms and Conditions of Service.

Customer with PURPA Section 210 qualifying cogeneration and/or small power production facilities shall take service under Tariff COGEN/SPP II or by special agreement with the Company.

N

N

DATE OF ISSUE: July 10, 2015

DATE EFFECTIVE: Service Rendered On And After June 30, 2015

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TITLE: Director Regulatory Services

By Authority Of An Order By The Public Service Commission

In Case No. 2014-00396 Dated June 22, 2015

<b>KENTUCKY PUBLIC SERVICE COMMISSION</b>
<b>JEFF R. DEROUEN EXECUTIVE DIRECTOR</b>
TARIFF BRANCH  <i>Brent Kirtley</i>
EFFECTIVE <b>6/30/2015</b> PURSUANT TO 807 KAR 5:011 SECTION 9 (1)

**From:** Kenneth L Borders [<mailto:klborders@aep.com>]  
**Sent:** Friday, August 11, 2017 3:03 PM  
**To:** George Scienski  
**Subject:** Kentucky Power - Question about station netting - Riverside Generation

---

Mr. Scienski,

Thank you for your letter dated June 27, 2017 that provided additional detail for Kentucky Power's consideration with respect to Riverside Generating Company LLC's request to terminate retail service under Tariff I.G.S. (Industrial General Service) and receive station power service directly from PJM under a remote self-supply arrangement. Because Riverside's units are located on a single site, a remote self-supply arrangement is not available.

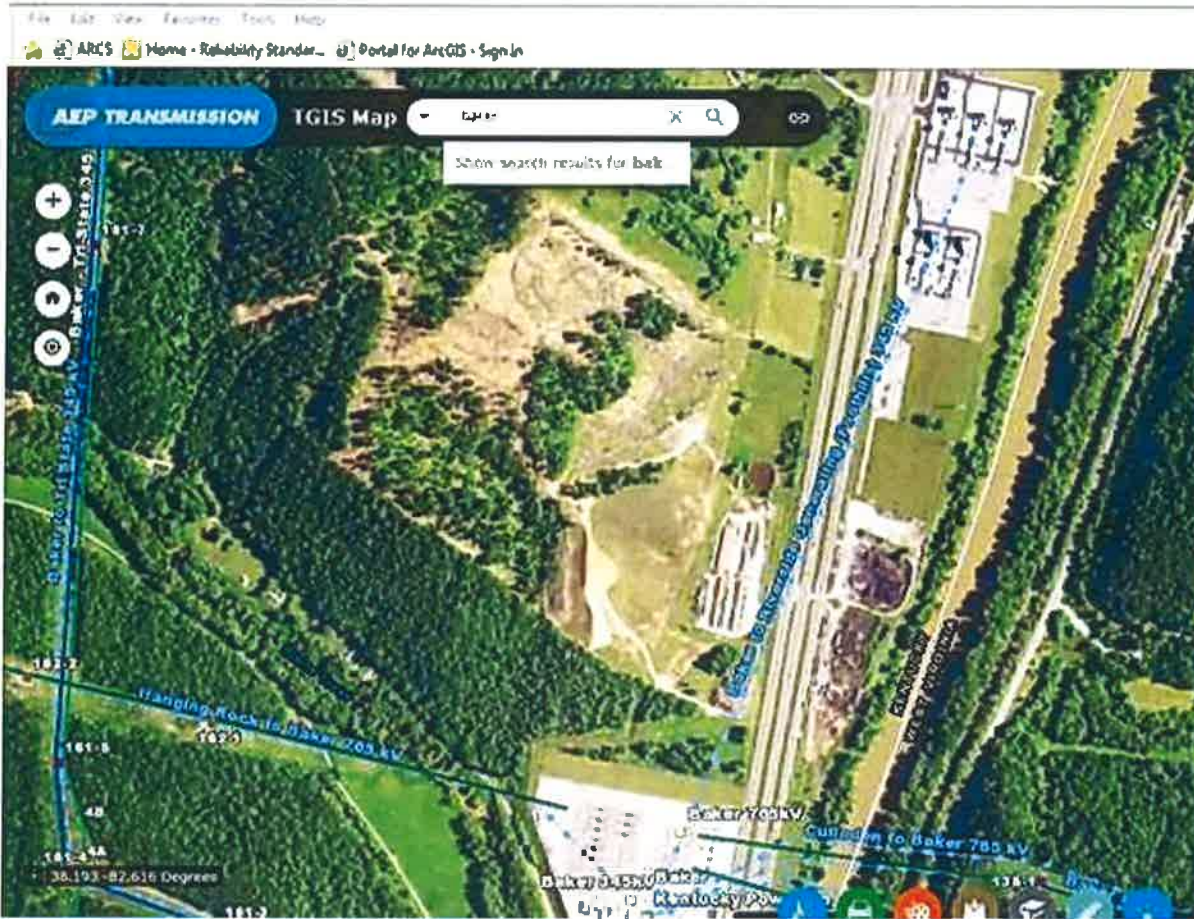
Although Riverside contends that "the Zelda site and the Foothills site may as well be located ten, twenty or even hundreds of miles from each other," the fact remains that they are not. The Riverside site is interconnected with Kentucky Power's grid at the Baker Substation and is served under a single retail billing account with Kentucky Power. An aerial photo demonstrating that Riverside's generating units are located on the same site connected to Kentucky Power's grid at the Baker Substation is attached as Exhibit A.

Further, separate identification and reporting at PJM is not sufficient to divide Riverside's single site into two separate sites. It is not uncommon for individual units of a multiple unit facility to be identified and reported separately at PJM, and this is often the case for a facility with multiple units that have been put in service at different times, as was the case with the Zelda and Foothills generators.

Because Riverside's Zelda and Foothills generators are located on the same site, they do not qualify for the remote self-supply provision of Kentucky Power's Tariff N.U.G (Non-Utility Generator). Accordingly, Kentucky Power will continue to bill Riverside's single retail billing account for the station power it receives under Tariff I.G.S.

Should you have additional questions or need additional information, please feel free to contact me.

## EXHIBIT A



**KENNETH L BORDERS** | CUSTOMER SVCS ENGINEER PRIN  
[KL.BORDERS@AEP.COM](mailto:KL.BORDERS@AEP.COM) | D:606.929.1453  
12333 KEVIN AVENUE, ASHLAND, KY 41102

**Riverside Generating Company, L.L.C.**  
**Case No. 2017-00472**  
**Commission Staff's First Request for Information**

7. Refer to the Hammond Testimony, pages 6-7, regarding the physical location of the Zelda and Foothills generating stations. Provide an aerial photograph depicting the property lines of the two generating stations, the location of each of the generation station, and the transmission interconnection of each generation station to Kentucky Power's Baker Switchyard.

**Response:**

Please see Page 2 of this Response.



**FOOTHILLS SITE**

**ZELDA SITE**

**Foothills 345kV  
Transmission Lines**

**Zelda 345kV  
Transmission Lines**

**GATE**

**Fence separating Zelda from Foothills**

**Riverside Generating Company, L.L.C.**  
**Case No. 2017-00472**  
**Commission Staff's First Request for Information**

8. Refer to the Hammond Testimony at page 7. Provide a copy of the Payment In Lieu of Taxes Agreements referenced in lines 5-7.

**Response:**

Please see Page 2 through Page 9 of this Response.



**IN-LIEU OF TAX PAYMENTS AGREEMENT**

**THIS IN-LIEU OF TAX PAYMENTS AGREEMENT** (the "In-Lieu of Agreement") made and entered into as of March 29, 2001, by and between the COUNTY OF LAWRENCE, KENTUCKY (the "Issuer"), a political subdivision, duly organized and validly existing under the laws of the Commonwealth of Kentucky and FOOTHILLS GENERATING, L.L.C., a Delaware limited liability company (the "Lessee").

**RECITALS**

WHEREAS, the Issuer is assisting the Lessee in funding the acquisition, construction, installation and equipping of a power plant including related easements and rights of way located in Lawrence County, Kentucky (the "Project") through the issuance from time to time of up to three series of bonds, in the aggregate principal amount not to exceed \$160,000,000 and designated County of Lawrence, Kentucky Industrial Building Revenue Bonds, Series 2001A, Series 2001B and Series 2002A (Foothills Generating, L.L.C. Project) (the "Bonds"); and

WHEREAS, in connection with the issuance of the Bonds, the Project will be conveyed to the Issuer and leased back to the Lessee, resulting in the Project being exempt from real and personal property taxes which have been or could be levied in the future, including but not limited to taxes imposed by the Issuer and taxes imposed for and/or collected on the Issuer's behalf, including the ad valorem and franchise tax imposed on operating property under Section 136.120 of the Kentucky Revised Statutes (the "Taxes"). In turn, the Project will be subleased by the Lessee to Lawrence County Colped Trust; and

WHEREAS, the Issuer and the Lessee wish to enter into this In-Lieu of Agreement under which the Lessee will make payments (the "In-Lieu of Payments") in lieu of the Taxes in an annual amount of NINETY THOUSAND DOLLARS (\$90,000).

NOW, THEREFORE, for and in consideration of the premises and mutual covenants and agreements contained herein, the parties agree as follows:

1. The Lessee will make the In-Lieu of Payments to the Issuer continuing annually for so long as the Bonds remain outstanding. The Lessee agrees to pay the Issuer NINETY THOUSAND DOLLARS (\$90,000) commencing with the tax year of the Issuer beginning on January 1, 2002, and continuing annually for so long as the Bonds remain outstanding.
2. Subject to the Lessee making In-Lieu of Payments, the Lessee shall not be liable for any additional Taxes in connection with the Project.
3. This In-Lieu of Agreement may be executed in any number of counterparts, each of which shall be regarded as an original and all of which shall constitute but one and the same instrument.

[The remainder of this page is left intentionally blank.]

Signatures appear on the following page.]

IN WITNESS WHEREOF, the Issuer and the Lessee have caused this Agreement  
to be duly executed as of the date hereinbefore written.

COUNTY OF LAWRENCE, KENTUCKY

By: David L. Compton  
Name: David L. Compton  
Title: County Judge/Executive

ATTEST:

By: Galli Nassif  
Title: Clerk

FOOTHILLS GENERATING, L.L.C.

By: \_\_\_\_\_  
Name: \_\_\_\_\_  
Title: \_\_\_\_\_

**IN-LIEU OF TAX PAYMENTS AGREEMENT**

**THIS IN-LIEU OF TAX PAYMENTS AGREEMENT** (the "In-Lieu of Agreement") made and entered into as of March 29, 2001, by and between the COUNTY OF LAWRENCE, KENTUCKY (the "Issuer"), a political subdivision, duly organized and validly existing under the laws of the Commonwealth of Kentucky and FOOTHILLS GENERATING, L.L.C., a Delaware limited liability company (the "Lessee").

**RECITALS**

WHEREAS, the Issuer is assisting the Lessee in funding the acquisition, construction, installation and equipping of a power plant including related easements and rights of way located in Lawrence County, Kentucky (the "Project") through the issuance from time to time of up to three series of bonds, in the aggregate principal amount not to exceed \$160,000,000 and designated County of Lawrence, Kentucky Industrial Building Revenue Bonds, Series 2001A, Series 2001B and Series 2002A (Foothills Generating, L.L.C. Project) (the "Bonds"); and

WHEREAS, in connection with the issuance of the Bonds, the Project will be conveyed to the Issuer and leased back to the Lessee, resulting in the Project being exempt from real and personal property taxes which have been or could be levied in the future, including but not limited to taxes imposed by the Issuer and taxes imposed for and/or collected on the Issuer's behalf, including the ad valorem and franchise tax imposed on operating property under Section 136.120 of the Kentucky Revised Statutes (the "Taxes"). In turn, the Project will be subleased by the Lessee to Lawrence County Colped Trust; and

## IN-LIEU OF TAX PAYMENTS AGREEMENT

**THIS IN-LIEU OF TAX PAYMENTS AGREEMENT** (the "In-Lieu of Agreement") made and entered into as of March 10, 2000, by and between the COUNTY OF LAWRENCE, KENTUCKY (the "Issuer"), a political subdivision, duly organized and validly existing under the laws of the Commonwealth of Kentucky, and **RIVERSIDE GENERATING COMPANY, L.L.C.**, a Delaware limited liability company (the "Company").

### RECITALS

WHEREAS, the Issuer is assisting the Company in funding the acquisition, construction, installation and equipping of a power plant including related easements and rights of way located in Lawrence County, Kentucky (the "Project") through the issuance from time to time of up to three series of bonds, in the aggregate principal amount not to exceed \$210,000,000 and designated County of Lawrence, Kentucky Industrial Building Revenue Bonds, Series 2000A, Series 2000B and Series 2001A (Riverside Generating Company, L.L.C. Project) (the "Bonds"); and

WHEREAS, in connection with the issuance of the Bonds the Project will be conveyed to the Issuer and leased back to Gene A. Wilson and Pauletta M. Wilson (collectively, the "Lessee"), removing the Project from the Issuer's ad valorem real estate and personal property taxes (the "Taxes"). In turn, the Project will be subleased by the Lessee to Lawrence County Riverside Trust 2000 and sub-subleased to the Company; and

WHEREAS, the Issuer and the Company wish to enter into this In-Lieu of Agreement under which the Company will make payments (the "In-Lieu of Payments"), in-lieu of ad valorem real estate and personal property taxes (the "Taxes") in an annual amount of NINETY THOUSAND DOLLARS (**\$90,000**).

**NOW, THEREFORE, for and in consideration of the premises and mutual covenants and agreements contained herein, the parties agree as follows:**

1. The Company will make the In-Lieu of Payments to the Issuer continuing annually for so long as the Bonds remain outstanding. The Company agrees to pay the Issuer **NINETY THOUSAND DOLLARS (\$90,000)** commencing with the tax year of the Issuer beginning on January 1, 2000, and continuing annually for so long as the Bonds remain outstanding.
2. Subject to the Company making In-Lieu of Payments, the Company shall not be liable for any additional Taxes in connection with the Project.
3. This Agreement may be executed in any number of counterparts, each of which shall be regarded as an original and all of which shall constitute but one and the same instrument.


[The remainder of this page is left intentionally blank.

Signatures appear on the following page.]

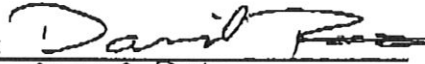
IN WITNESS WHEREOF, the Issuer and the Company have caused this

Agreement to be duly executed as of the date hereinbefore written.

RIVERSIDE GENERATING COMPANY,  
L.L.C.

By:   
Gregory D. Kingsley  
Title: Assistant Treasurer

ATTEST:

By:   
David R. Roth  
Title: Assistant Secretary

COUNTY OF LAWRENCE, KENTUCKY

By: \_\_\_\_\_

Title: \_\_\_\_\_

IN WITNESS WHEREOF, the Issuer and the Company have caused this  
Agreement to be duly executed as of the date hereinbefore written.

RIVERSIDE GENERATING COMPANY,  
L.L.C.

By: \_\_\_\_\_

Title: \_\_\_\_\_

ATTEST:

By: *Galio Isaac J*

Title Lawrence County Clerk

COUNTY OF LAWRENCE, KENTUCKY

By: *David X. Condon*

Title: County Judge/Executive



**Riverside Generating Company, L.L.C.**  
**Case No. 2017-00472**  
**Commission Staff's First Request for Information**

9. Refer to the Hammond Testimony at page 7, lines 13-15 which state, "As a result, Riverside should be permitted to self-supply its Station Power in accordance with the PJM OATT, and thus cease satisfying all of its electric needs with the retail purchases from Kentucky Power."
- a. If Riverside is permitted to self-supply its station power, explain why it needs to remain a customer of Kentucky Power.
  - b. State the amount Riverside would have been billed by Kentucky Power for service for calendar year 2017 if it had been permitted to self-supply its station power.

**Response:**

- a. Consistent with Kentucky Power's Tariff N.U.G., Riverside believes it is entitled to take service under the terms and conditions contained within PJM's OATT. Riverside further believes that Kentucky Power, as the relevant electric distribution company and owner of the relevant meters and facilities, will be involved in the station power settlement process that is contemplated by PJM's OATT and the self-supply/netting construct. Riverside would expect its relationship to Kentucky Power and any charges it may owe PJM and/or Kentucky Power to be elucidated when establishing the station power settlement process with respect to the Zelda and Foothills sites.
- b. Under the terms of Tariff N.U.G., if Riverside had been permitted to self-supply its station power it would have taken service under the terms and conditions contained within PJM'S OATT. While the specific details of the station power settlement process in this hypothetical are unknown, Riverside would generally expect a net zero settlement for the sites unless generation was insufficient to offset consumption.

**Riverside Generating Company, L.L.C.**  
**Case No. 2017-00472**  
**Commission Staff's First Request for Information**

10. Refer to the Complaint filed by Riverside on December 13, 2017, page 3. Explain whether the revisions made by Kentucky Power to its Tariff N.U.G. as discussed in the footnote on this page is relevant to Riverside's complaint. If yes, explain.

**Response:**

The revisions made by Kentucky Power to its Tariff N.U.G. were ostensibly proposed to change the scope of the tariff's applicability, and in particular to narrow the universe of non-utility generators capable of remotely self-supplying start-up and station power under the tariff's terms. Because the Foothills site and Zelda site are "owned by the same individual business entity," Kentucky Power's recent revisions to Tariff N.U.G. should not impact this case; however, those changes are relevant to Riverside's operations and strategy and underscore the need for Kentucky Power to have tariff terms in place that are both reasonable and reasonably understood.

**COMMONWEALTH OF KENTUCKY**  
**BEFORE THE PUBLIC SERVICE COMMISSION**

In the Matter of:

RIVERSIDE GENERATING COMPANY, L.L.C. )

v. )

KENTUCKY POWER COMPANY )

) Case No. 2017-00472  
)  
)

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**VERIFICATION OF ANTHONY HAMMOND**

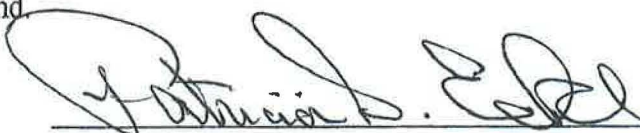
STATE OF )

COUNTY OF )

Anthony Hammond, Vice President of Riverside Generating Company, L.L.C., being duly sworn, states that he has supervised the preparation of Riverside's Response to Commission Staff's First Request for Information in the above-referenced matter and that the matters and things set for in the Response are true and accurate to the best of his knowledge, information, and belief formed after a reasonable inquiry.

  
\_\_\_\_\_  
Anthony Hammond

The foregoing Verification was signed, acknowledged and sworn to before me this 19 day of April, 2018, by Anthony Hammond.

  
\_\_\_\_\_  
NOTARY PUBLIC, Notary #

Commission expiration: 7/15/2020

