

Kentucky Power company
KPSC Case No. 2019-00002
Commission Staff's First Set of Data Requests
Dated February 11, 2019

DATA REQUEST

KPSC_1 For the period from May 1, 2018, to October 31, 2018 (the last six months of the period under review), provide the amount of coal purchased in tons, and the percentage of purchases that were spot versus contract.

RESPONSE

For purposes of the Company's monthly fuel adjustment clause back-up filings, Kentucky Power defines a spot purchase as an agreement with a term of one year or less. To permit the Commission to reconcile this response to the Company's fuel adjustment clause back-up filings, the term "spot purchase" is likewise defined for purposes of KPCO_R_KPSC_1_1_Attachment1.pdf as any purchase with a term of one year or less.

The Company's definition of spot purchase for purposes of this response and Kentucky Power's fuel adjustment clause back-up filings differs slightly from the definition used by Commission's Staff in KPSC 1-02 (defining spot purchase as less than one year) and the accompanying response by Kentucky Power.

Witness: Amy E. Jeffries

Counterparty	Type of Purchase	Total Tons
Alpha Coal Sales Co., LLC	Spot	161,908
Alpha Coal Sales Co., LLC	Contract	52,237
Case Coal Sales, LLC	Spot	6,770
Coal Network, LLC	Contract	25,308
Consolidation Coal Company and McElroy Coal Company*	Contract	230,005
Ember Energy, LLC	Contract	5,298
KZ Energy, LLC	Spot	2,994
Seminole Coal Resources, LLC	Contract	13,529
SNR RiverOps, LLC	Spot	23,128

*Formerly listed as Consolidation Coal Company - OVRI

TOTAL	521,176
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Total Contract	63%
Total Spot	37%

Kentucky Power company
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DATA REQUEST

KPSC_2

For the last six months of the period under review, list each coal purchase made under a long-term contract (one year or greater). For each purchase, list:

- a. Contract or purchase order number;
- b. The supplier's name;
- c. The location(s) of production facilities from which the coal is sourced;
- d. The method of delivery, (i.e., barge, truck, rail, other);
- e. The actual quantity received during the review period; and
- f. Current price paid per ton.

RESPONSE

Please see attachment KPCO_R_KPSC_1_2_Attachment 1.pdf for the requested information.

Witness: Amy E. Jeffries

This response is provided for the time period of May 1, 2018 through October 31, 2018 and lists all pertinent fuel contract information requested. Tonnage information is reported per Kentucky Power ownership share.

a. Contract/Purchase Order No.	b. Supplier Name	c. Location of Production Facilities	d. Method of Delivery	e. Tonnage Quantity Received During Review Period	f. Tonnage Quantity Requirement for Review Period	g. Current Price per Ton	
03-00-17-003	Alpha Coal Sales Co., LLC	Mammoth, Black Castle, Republic, Empire-Kanawha, Boone, Raleigh Counties, WV	Barge	52,237	80,000	\$54.50	Note 1
03-00-17-005	Alpha Coal Sales Co., LLC	Mammoth, Black Castle, Republic, Empire-Kanawha, Boone, Raleigh Counties, WV	Barge	128,122	175,000	\$52.50	Note 1
03-00-17-007	Coal Network, LLC	Perry County, KY	Barge	25,308	23,040	\$55.05	Note 1
07-77-05-900	Consolidation Coal Company and McElroy Coal Company	McElroy Mine, Marshall County, WV and Century Mine, Belmont/Monroe Counties, OH	Conveyor	230,005	429,220	\$43.06	Note 3
03-00-16-003	Ember Energy, LLC	Various Mines, Magoffin County, KY	Barge	691	0	\$49.74	Note 4
03-00-17-004	Ember Energy, LLC	Various Mines, Magoffin County, KY	Barge	4,607	18,000	\$54.49	Note 2
03-00-16-007	Seminole Coal Resources, LLC	Sycamore Surface, Kanawha and Fayette, Counties, WV	Barge	13,529	0	\$53.00	Note 4
03-00-17-006	SNR RiverOps, LLC	Ivel, KY; Ft. Gay, WV; Toler, KY; White Oak, KY	Barge	23,128	23,250	\$54.95	Note 1

Note 1	All contractual tonnage requirements met during the last six months of the period under review
Note 2	Notified supplier of shortfall and working with supplier/AEP legal to remedy situation
Note 3	Successfully negotiated to carry shortfall tonnage into future period at no penalty; Not inclusive of tons sold
Note 4	Includes shortfall tons delivered during the last six months of the period under review

Kentucky Power company
KPSC Case No. 2019-00002
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Page 1 of 2

DATA REQUEST

KPSC_3

- a. As of the last day of the review period, state the coal inventory level in tons, and in number of days' supply. Provide this information by generating station and in the aggregate.
- b. Describe the criteria used to determine the number of days' supply.
- c. State the target coal inventory level for each generating station, and for the total system.
- d. If actual coal inventory exceeds the target inventory by ten days' supply, state the reasons for the excessive inventory.
- e. (1) State whether any significant changes in the current coal inventory target are expected within the next 12 months.

(2) If so, state the expected change, and the reasons for this change.

RESPONSE

- a. As of October 31, 2018, Kentucky Power's actual coal inventory levels were as follows:

Mitchell High Sulfur: 80,000 tons, or 10 days of supply, and
Mitchell Low Sulfur: 131,000 tons, or 17 days of supply.

- b. Days' supply is determined by dividing the tons of coal in storage by the full load burn rate (tons per day).

For Mitchell High Sulfur, $\frac{80,000 \text{ tons in storage as of } 10/31/2018}{7,680 \text{ (full load burn rate - tons/day)}} = 10 \text{ days}$

For Mitchell Low Sulfur, $\frac{131,000 \text{ tons in storage as of } 10/31/2018}{7,680 \text{ (full load burn rate - tons/day)}} = 17 \text{ days}$

- c. As of October 31, 2018, Kentucky Power's total coal inventory was 10 days under its target.

Mitchell High Sulfur: Target Inventory Days = 15 days, Actual Inventory Days = 10 days
(5 days under target)

Mitchell Low Sulfur: Target Inventory Days = 30 days, Actual Inventory Days = 17 days
(13 days under target)

Kentucky Power company
KPSC Case No. 2019-00002
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Page 2 of 2

d. Not applicable.

e. (1) No.

(2) Not applicable.

Witness: Amy E. Jeffries

Kentucky Power company
KPSC Case No. 2019-00002
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DATA REQUEST

KPSC_4

4. List each written coal-supply solicitation issued during the last six months of the period under review.
 - a. For each solicitation, provide the date of the solicitation, the type of solicitation (contract or spot), the quantities solicited, a general description of the quality of coal solicited, the time period over which deliveries were requested, and the generating unit(s) for which the coal was intended.
 - b. For each solicitation, state the number of vendors to whom the solicitation was sent, the number of vendors who responded, and the selected vendor(s). Provide the bid tabulation sheet or corresponding document that ranks the proposals. (This document shall identify all vendors who made offers.) State the reasons for each selection. For each lowest-cost bid not selected, explain why the bid was not selected.

RESPONSE

Kentucky Power performed two written solicitations for the Mitchell Plant during the last six months of the period under review.

- a. In addition to the number of vendors to whom the solicitation was sent, the number of vendors who responded, and the selected vendor(s), the requested information can be found in KPCO_R_KPSC_1_4_Attachment1.pdf and KPCO_R_KPSC_1_4_Attachment3.pdf.
- b. The bid tabulation sheets can be found in KPCO_R_KPSC_1_4_Redacted_Attachment2.pdf and KPCO_R_KPSC_1_4_Redacted_Attachment4.pdf.

Witness: Amy E. Jeffries

Date of Solicitation	August 2, 2018
Quantities Solicited (Tons)	150,000 ⁽¹⁾ 3,500,000 ⁽²⁾ 2,500,000 ⁽³⁾ 1,500,000 ⁽⁴⁾
Type of Solicitation	Spot and Contract
Coal Heat Content (BTU/lb)	12,000
Sulfur (%)	1.00
Time Period Over Which Deliveries Were Requested	October 1, 2018 - December 31, 2018 ⁽¹⁾ January 1, 2019 - December 31, 2019 ⁽²⁾ January 1, 2020 - December 31, 2020 ⁽³⁾ January 1, 2021 - December 31, 2021 ⁽⁴⁾
Applicable Generating Units	Mitchell Plant
Number of Vendors Solicitation Delivered To	Publically Posted and Emailed to over 60 contacts
Number of Vendors Responding to Solicitation	4 ⁽¹⁾ 7 ⁽²⁾ 3 ⁽³⁾ 1 ⁽⁴⁾
Vendor(s) Selected	Alpha Coal Sales Co., LLC ⁽²⁾ SNR River Ops ⁽²⁾ Blackjewel Marketing and Sales ⁽²⁾ Case Coal Sales, LLC ⁽²⁾ Alpha Coal Sales Co., LLC ⁽³⁾

CAPP Barge RFP Offers - August 2, 2018 - Mitchell Plant

Offer / Plant / Year	Mine	Quantity		Coal Price	Transportation			Offered Quality			Quality Adjusted Delivered Pricing																																																																																																												
		Tons	BTU	Coal Price	River / Rail	MP / District	Rate	Btu	lbs. SO ₂	Sulfur %	Ash %	Quality Adj.	Quality Adjusted Delivered Cost	Delivered \$/MMBTU																																																																																																									
Q4 2018																																																																																																																							
(1) Offer does not meet requested quality (2) AEP Field representative noted concerns of coal quality (contamination) at the dock																																																																																																																							
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CAPP Barge RFP Offers - August 2, 2018 - Mitchell Plant

Offer / Plant / Year	Mine	Quantity		Coal Price	Transportation			Offered Quality				Quality Adjusted Delivered Pricing																																																														
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2019																																																																										
Alpha Coal Sales Co, LLC	Mammoth, Blk Castle, Republic, etc	500,000	12,000,000	\$58.00	KR	Mammoth/Marmet	\$6.690	12,000	1.67	1.00	12.00	\$2.740	\$67.430	\$2.8096																																																												
SNR River Ops	SNR RailOps; Powermill Proc.; Southbound	186,000	4,464,000	\$58.00	BS - Lockwood	MP 6.0	\$6.747	12,000	1.67	1.00	12.00	\$2.740	\$67.486	\$2.8119																																																												
Blackjewel Marketing and Sales	Lexington Coal Co - ALL TRANCHES	594,000	14,137,200	\$61.07	KR - Marmet Dock	MP 69.1	\$6.314	11,900	1.68	1.00	12.50	\$2.733	\$70.117	\$2.9461																																																												
Case Coal Sales, LLC	3 KY mines	162,000	3,888,000	\$62.50	BS - Lockwood	MP 6.0	\$6.747	12,000	1.67	1.00	12.00	\$2.740	\$71.986	\$2.9994																																																												
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CAPP Barge RFP Offers - August 2, 2018 - Mitchell Plant

Offer / Plant / Year	Mine	Quantity		Coal Price	Transportation			Offered Quality			Quality Adjusted Delivered Pricing											
		Tons	BTU	Coal Price	River / Rail	MP / District	Rate	Btu	lbs. SO ₂	Sulfur %	Ash %	Quality Adj.	Quality Adjusted Delivered Cost	Delivered \$MMBTU								
2020																						
Alpha Coal Sales Co, LLC	Mammoth, Blk Castle, Republic, etc	1,000,000	24,000,000	\$59.00	KR	Mammoth/Marmet	\$6.891	12,000	1.67	1.00	12.00	\$2.740	\$68.631	\$2.8596								
(1) Offer does not meet requested quality																						
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CAPP Barge RFP Offers - August 2, 2018 - Mitchell Plant

Offer / Plant / Year	Mine	Quantity		Coal Price	Transportation			Offered Quality				Quality Adjusted Delivered Pricing										
		Tons	BTU	Coal Price	River / Rail	MP / District	Rate	Btu	lbs. SO ₂	Sulfur %	Ash %	Quality Adj.	Quality Adjusted Delivered Cost	Delivered \$MMBTU								
2021																						
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Mitchell Plant																						
FGD Removal Efficiency	97.80%																					
SO ₂ Allowance Cost	\$2.00																					
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Date of Solicitation	October 31, 2018
Quantities Solicited (Tons)	As Offered ⁽¹⁾ 1,250,000 ⁽²⁾ 1,250,000 ⁽³⁾ 1,250,000 ⁽⁴⁾
Type of Solicitation	Spot and Contract
Coal Heat Content (BTU/lb)	12,000
Sulfur (%)	1.00
Time Period Over Which Deliveries Were Requested	November 1, 2018 - March 31, 2019 ⁽¹⁾ January 1, 2019 - December 31, 2019 ⁽²⁾ January 1, 2020 - December 31, 2020 ⁽³⁾ January 1, 2021 - December 31, 2021 ⁽⁴⁾
Applicable Generating Units	Mitchell Plant
Number of Vendors Solicitation Delivered To	Publically Posted and Emailed to over 60 contacts
Number of Vendors Responding to Solicitation	0 ⁽¹⁾ 4 ⁽²⁾ 2 ⁽³⁾ 1 ⁽⁴⁾
Vendor(s) Selected	Alpha Coal Sales Co., LLC ⁽²⁾ SNR Appalachian Trading, LLC ⁽²⁾ Blackhawk Coal Sales, LLC ⁽²⁾ Alpha Coal Sales Co., LLC ⁽³⁾ Blackhawk Coal Sales, LLC ⁽³⁾ Blackhawk Coal Sales, LLC ⁽⁴⁾

Mitchell Plant - 2019 CAPP RFP Offers - October 31, 2018

Offer / Plant / Year	Mine	Quantity		Coal Price	Transportation			Offered Quality				Quality Adjusted Delivered Pricing			Comments	
		Tons	BTU	Coal Price	River / Rail	MP / District	Rate	Btu	lbs. SO ₂	Sulfur %	Ash %	Quality Adj.	Quality Adjusted Delivered Cost	Delivered \$MMBTU		
2019																
Alpha Coal Sales Co, LLC	Mammoth, Blk Castle, Republic, etc	180,000	4,320,000	\$63.00	FOB Barge - KR	Mammoth/Marmet	\$6.130	12,000	1.60	0.96	12.00	\$2.625	\$71.755	\$2.9898		2019 April - Dec and CY 2020
Alpha Coal Sales Co, LLC	Mammoth, Blk Castle, Republic, etc	30,000	720,000	\$63.00	FOB Barge - KR	Mammoth/Marmet	\$6.130	12,000	1.60	0.96	12.00	\$2.625	\$71.755	\$2.9898		Q1 2019
SNR Appalachian Trading, LLC	SNR RailOps; Powermill Proc.; Southbound	74,400	1,785,600	\$62.50	FOB Barge - BS	MP 6.0	\$6.550	12,000	1.67	1.00	12.00	\$2.740	\$71.790	\$2.9913		Offered CY 2019 Only
Blackhawk Coal Sales, LLC	Blue Creek	100,000	2,400,000	\$63.50	FOB Barge - KR	MP 73.3	\$6.130	12,000	1.45	0.87	13.00	\$2.379	\$72.009	\$3.0004		Term 2019-2021
Mitchell Plant																
FGD Removal Efficiency		97.80%														
SO ₂ Allowance Cost		\$2.50														
Removal Cost \$/Ton		\$139.75														

Mitchell Plant - 2020 CAPP RFP Offers - October 31, 2018

Offer / Plant / Year	Mine	Quantity		Coal Price	Transportation			Offered Quality				Quality Adjusted Delivered Pricing			Comments
		Tons	BTU		River / Rail	MP / District	Rate	Btu	lbs. SO ₂	Sulfur %	Ash %	Quality Adj.	Quality Adjusted Delivered Cost	Delivered \$MMBTU	
2020															
Alpha Coal Sales Co, LLC	Mammoth, Blk Castle, Republic, etc	500,000	12,000,000	\$63.00	FOB Barge -KR	Mammoth 84.4/Marm	\$6.130	12,000	1.60	0.96	12.00	\$2.625	\$71.755	\$2.9898	2019 April - Dec and CY 2020
Blackhawk Coal Sales, LLC	Blue Creek	480,000	11,520,000	\$64.00	KR - Quincy Dock	MP 73.3	\$6.130	12,000	1.45	0.87	13.00	\$2.379	\$72.509	\$3.0212	Term 2019-2021

Mitchell Plant	
FGD Removal Efficiency	97.80%
SO ₂ Allowance Cost	\$2.50
Removal Cost \$/Ton	\$139.75

Mitchell Plant - 2021 CAPP RFP Offers - October 31, 2018

Offer / Plant / Year	Mine	Quantity		Coal Price	Transportation			Offered Quality				Quality Adjusted Delivered Pricing			Comments									
		Tons	BTU	Coal Price	River / Rail	MP / District	Rate	Btu	lbs. SO ₂	Sulfur %	Ash %	Quality Adj.	Quality Adjusted Delivered Cost	Delivered \$MMBTU										
2021																								
Blackhawk Coal Sales, LLC	Blue Creek	480,000	11,520,000	\$65.00	KR - Quincy Dock	MP 73.3	\$6.130	12,000	1.45	0.87	13.00	\$2.379	\$73.509	\$3.0629	Term 2019-2021									
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Mitchell Plant																								
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DATA REQUEST

KPSC_5

List each oral coal-supply solicitation issued during the last six months of the period under review.

a. For each solicitation , state why the solicitation was not written, the date(s) of the solicitation, the quantities solicited, a general description of the quality of coal solicited, the time period over which deliveries were requested, and the generating unit(s) for which the coal was intended.

b. For each solicitation, identify all vendors solicited and the vendor(s) selected. Provide the bid tabulation sheet or other document that ranks the proposals. (This document shall identify all vendors who made offers.) State the reasons for each selection. For each lowest-cost bid not selected, explain why the bid was not selected.

RESPONSE

There were no oral coal-supply solicitations during the last six months of the period under review.

Witness: Amy E. Jeffries

Kentucky Power company
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DATA REQUEST

KPSC_6

For the last six months of the period under review, list each vendor from whom natural gas was purchased for generation and the quantities and the nature of each purchase (i.e., spot or contract). Provide the percentage of purchases that were spot versus contract.

RESPONSE

Please see attachment KPCO_R_KPSC_1_6_Attachment1.pdf for the requested information.

Witness: Clinton M. Stutler

Natural Gas Purchases
May 1, 2018 - October 31, 2018

Counterparty	Type of Purchase	Gross MMBTUs
DTE Energy Trading, Inc.	Spot	35,000
EDF Trading North America, LLC	Spot	194,800
Interstate Gas Supply, Inc	Spot	161,000
Macquarie Energy LLC	Spot	494,600
Mercuria Energy American, Inc.	Spot	158,900
NextEra Energy Power Marketing, LLC	Spot	399,600
NJR Energy Services	Spot	59,600
Range Resources - Appalachia, LLC	Spot	37,100
Sequent Energy Management, L.P.	Spot	911,800
SPOTLIGHT Energy, LLC	Spot	186,600
Tenaska Marketing Ventures	Spot	345,100
TEXLA Energy Management, Inc.	Spot	291,700
VITOL Inc.	Spot	1,084,300
Centerpoint Energy	Spot	10,000
Elevation Energy Group	Spot	336,700
J. Aron & Company	Spot	25,000
Snyder Brothers, Inc.	Spot	270,800

Grand Total	5,002,600
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Total Contract	0%
Total Spot	100%

Kentucky Power company
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DATA REQUEST

KPSC_7

For the last six months of the period under review, state if there were any instances in which a natural gas generating unit could not be operated when it otherwise would have run, due to pipeline constraints or natural gas being unavailable.

RESPONSE

Kentucky Power Company did not encounter any instances in which a natural gas generating unit could not be operated when it otherwise would have run, due to pipeline constraints or natural gas being unavailable, during the last six months of the period under review.

Witness: Clinton M. Stutler

Kentucky Power company
KPSC Case No. 2019-00002
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DATA REQUEST

KPSC_8

State if there have been any changes to hedging activities for coal or natural gas purchases used for generation since the previous FAC review proceeding. If so, describe the changes in detail.

RESPONSE

There have been no changes to hedging activities for coal or natural gas purchases since the prior FAC review proceeding.

Witness: Clinton M. Stutler
Amy E. Jeffries

Kentucky Power company
KPSC Case No. 2019-00002
Commission Staff's First Set of Data Requests
Dated February 11, 2019

DATA REQUEST

KPSC_9

a. State whether Kentucky Power has audited any of its fuel or transportation contracts during the last six months of the period under review.

b. If so, for each audited contract:

(1) Identify the contract;

(2) Identify the auditor; and

(3) State the results of the audit and describe the actions that Kentucky Power took as a result of the audit.

RESPONSE

a. Kentucky Power did not audit any of its fuel or transportation contracts during the last six months of the period under review.

b. Not applicable.

Witness: Clinton M. Stutler
 Amy E. Jeffries

Kentucky Power company
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Dated February 11, 2019

DATA REQUEST

KPSC_10

- a. State whether Kentucky Power is currently involved in any litigation with its current or former fuel suppliers or transportation vendors.
- b. If yes, for each litigation:
 - (1) Identify the supplier or vendor;
 - (2) Identify the contract involved;
 - (3) State the potential liability or recovery to Kentucky Power;
 - (4) List the issues presented; and
 - (5) Provide a copy of the complaint or other legal pleading that initiated the litigation and any answers or counterclaims. If a copy has previously been filed with the Commission, provide the date on which it was filed and the case in which it was tiled.
- c. State the current status of all litigation with suppliers or vendors.

RESPONSE

- a. Kentucky Power is not currently involved in any litigation with its current or former coal suppliers.
- b. Not applicable.
- c. Not applicable.

Witness: Clinton M. Stutler
 Amy E. Jeffries

Kentucky Power company
KPSC Case No. 2019-00002
Commission Staff's First Set of Data Requests
Dated February 11, 2019

Page 1 of 2

DATA REQUEST

KPSC_11

- a. For the last six months of the period under review, state if there have been any changes to Kentucky Power's written policies and procedures regarding its fuel procurement?
- b. If yes:
- (1) Describe the changes;
 - (2) Provide the written policies and procedures as changed;
 - (3) State the date(s) the changes were made; and
 - (4) Explain why the changes were made.
- c. If no, provide the date Kentucky Power's current fuel procurement policies and procedures were last changed, when they were last provided to the Commission, and identify the proceeding in which they were provided.

RESPONSE

a. Yes, there have been changes to Kentucky Power's written policies and procedures regarding its fuel procurement for the last six months of the period under review.

b.

(1) 1.0 Regulated Fuel Procurement (FP) Organization

Section 1.1 – Roles & Responsibilities of the Regulated FP Organization

- Included the management and operation of the River Transportation Division, which includes the barges and tow boats for delivery of coal to the coal fired generation plants as well as delivery of some reagents

Section 1.2 – Organizational Structure of Regulated FP

- Included Boat Operations in area describing functions that report to the VP of Regulated Fuel Procurement

Section 1.3 – Regulated FP Responsibilities

- No changes

Section 1.4 – General Administrative Duties

- No changes

2.0 Regulated FP Policy and Procedures and Implementation

Section 2.1 – Business Ethics and Corporate Compliance

Kentucky Power company
KPSC Case No. 2019-00002
Commission Staff's First Set of Data Requests
Dated February 11, 2019

Page 2 of 2

- No changes
 - Section 2.2 – Regulated FP Considerations
 - No changes
 - Section 2.3 – Proper Inventory Levels
 - General clean up on paragraphs 3 &4
 - 3.0 Regulated Fuel Procurement Methods and Documentation
 - Section 3.1 – Requests for Proposals (RFP)
 - No changes
 - Section 3.2 – Other Non-Solicited Offer Evaluation
 - No changes
 - Section 3.3 – Emergency Procurement
 - No changes
 - Section 3.4 – Coal and Reagent Quality Specifications and Compliance
 - No changes
 - Section 3.5 – Negotiating Responsibility
 - Included Managing Director, Boat Operations in potential individuals comprising the negotiating team
 - Senior Manager - Fuel (coal) and Senior Manager - Fuel Transportation & logistics changed to "Manager"
 - Section 3.6 – Enforcement of Agreements
 - No changes
 - 4.0 Hedging Policy
 - Section 4.1 – Hedging Definition
 - No changes
 - Section 4.2 – Hedging Strategy
 - No changes
 - 5.0 Contract Administration
 - Section 5.1 – Overview of Responsibilities
 - Insertion of "ash marketing" as a type of fuel contract
 - Energy Contracts & Confirmation group changed to be the sole performer of contract administration within AEP
- (2) The written policies and procedures as changed are provided as KPCO_R_KPSC_1_11_Attachment1.pdf.
- (3) Kentucky Power's written policies and procedures as described above were changed in May 2018.
- (4) The described material changes made the Fuel Procurement Policy and Procedures Manual applicable to the River Transportation Division.

c. Not applicable.

Witness: Clinton M. Stutler
 Amy E. Jeffries



Cover Sheet

Organization: Regulated Fuel Procurement

Title: Regulated Fuel Procurement Policy and Procedures

Revision: May 2018

Approved By:	Date	Signature
Marguerite C. Mills, VP Fuel Procurement	5/15/18	Marguerite C. Mills

AMERICAN ELECTRIC POWER

REGULATED FUEL PROCUREMENT POLICY AND PROCEDURES

May 2018

Table of Contents

INTRODUCTION	3
1.0 Regulated Fuel Procurement Organization	4
1.1 Roles and Responsibilities of the Regulated Fuel Procurement Organization	4
1.2 Organizational Structure of Regulated Fuel Procurement	4
1.3 Regulated Fuel Procurement Responsibilities	5
1.4 General Administrative Duties	6
2.0 Regulated Fuel Procurement Policy and Procedures and Implementation	7
2.1 Business Ethics and Corporate Compliance	7
2.2 Regulated Fuel Procurement Considerations	7
2.3 Proper Inventory Levels	7
3.0 Regulated Fuel Procurement Methods and Documentation	8
3.1 Requests for Proposal (RFP)	8
3.2 Other Non-Solicited Offer Evaluation	9
3.3 Emergency Procurement	9
3.4 Coal and Reagent Quality Specifications and Compliance	10
3.5 Negotiating Responsibility	10
3.6 Enforcement of Agreements	11
4.0 Hedging Policy	11
4.1 Hedging Definition	11
4.2 Hedging Strategy	12
5.0 Contract Administration	12
5.1 Overview and Responsibilities	12
APPENDIX A	14
APPENDIX B	16

INTRODUCTION

The purpose of this document is to describe the procurement policy and procedures (P&Ps) utilized by the regulated Fuel Procurement (FP) organization within the Commercial Operations organization of American Electric Power Service Corporation (AEPSC). The regulated FP organization is responsible for the procurement of fuel, reagents, and transportation services. The P&Ps were developed to help ensure that appropriate procurement methods are documented and followed.

This document summarizes the roles and responsibilities of the various groups within the regulated Fuel Procurement organization as they pertain to the procurement of fuel, reagents, and transportation. This document also contains a general discussion of policies to be followed when participating in hedging activities.

This document replaces the FEL Fuel Procurement Policy from 2015, which was the most recent approved version. This document is intended to be updated on an as-needed basis, to ensure consistency with current organizational structure and any relevant changes to company or regulatory policy.

1.0 Regulated Fuel Procurement (FP) Organization

1.1 Roles and Responsibilities of the Regulated FP Organization

The regulated FP organization operates within the Commercial Operations organization of AEPSC, and provides procurement and transportation services for the fleet of power plants owned and operated by American Electric Power (AEP) and its regulated operating companies, as well as the Ohio Valley Electric Corporation (OVEC) and the Indiana Kentucky Electric Corporation (IKEC). The Vice President (VP) of regulated FP reports to the Senior Vice President (SVP) of the Commercial Operations organization of AEPSC. The regulated FP organization is responsible for procuring all the fuel (coal, natural gas and fuel oil), reagents (trona, urea, lime, limestone, activated carbon, sodium bicarbonate, anhydrous ammonia, calcium bromide, etc.) and associated transportation services required by the applicable power plants, including the management and operation of the River Transportation Division's barges and tow boats for delivery of coal and some reagents.

Regulated FP also provides current market-based pricing information to AEP's Commercial Operations organization. This information is used for generation-related functions on behalf of the regulated operating companies, OVEC and IKEC.

The regulated FP organization communicates with the Production Optimization and the Bid, Offer & Cost Development groups daily and monthly so that load forecasts and fuel purchasing are effectively coordinated to ensure that plants receive adequate supplies of fuel to meet the planned dispatch for generating units over the short-term. For long-term procurement planning, regulated FP communicates with the groups that are responsible for developing the Integrated Resource Plan, which include, but is not limited to, the Corporate Planning & Budgeting organization.

The regulated FP organization supports, as necessary, fuel-related regulatory activities in response to state and federal agency requirements, including preparation of reports, testimony, schedules, and interrogatory responses.

1.2 Organizational Structure of Regulated FP

The VP of regulated FP has the ultimate responsibility to ensure that AEP's, OVEC's and IKEC's generating stations maintain appropriate and reliable supplies of fuel and reagents consistent with generating unit requirements and environmental regulations, as well as the means to transport those commodities to the plants.

The following functions report to the VP of regulated FP:

- **Fuel Procurement – Coal**

Responsible for the procurement of coal and the management of coal inventories for the regulated AEP operating companies', OVEC's and IKEC's power plants.

- **Fuel Procurement – Natural Gas and Fuel Oil**

Responsible for the procurement of natural gas supply and transportation services and fuel oil for the regulated AEP operating companies' power plants.

- **Coal Transportation, Logistics & Marketing**

Responsible for the transportation of coal and other bulk commodities, logistics, and railcar leasing for the regulated AEP operating companies', OVEC's and IKEC's power plants. Marketing activities of available capacity at Cook Coal Terminal are also managed.

- **Reagent & Coal Combustion Products Procurement**

Responsible for the procurement of products used to mitigate emissions from the regulated AEP operating companies', OVEC's and IKEC's power plants. Marketing activities associated with post combustion products are also managed.

- **Boat Operations**

Responsible for the management and operation of the River Transportation Division's barges and tow boats for delivery of coal to the coal fired generation plants as well as the delivery of some reagents. Dispatching of the fleet, accounting, and cross-charter benefits are realized through a contract with a large third-party barge operator.

A current organizational chart for regulated FP is included as Appendix A of this policy.

1.3 Regulated FP Responsibilities

The responsibility for overall procurement and associated activities is that of the VP of regulated FP. As shown in the Organizational Chart in Appendix A, the Directors and Managers performing the regulated fuel procurement organization's functions shall report to the VP of regulated FP. Personnel from other AEPSC departments shall participate in these activities when it is deemed beneficial to the goals and objectives for AEP as a whole.

The Directors and Managers of regulated FP shall, in conjunction with others, oversee the development, negotiation, execution, and administration of supply and transportation agreements. The Directors and Managers shall exercise the prudent judgment, practical experience, organizational ability, and supervisory capacity necessary to administer the group's operations consistent with this policy.

Each Director and/or Manager is responsible for directing and/or performing the planning and execution of fuel, transportation, and reagent purchases for AEP's regulated operating companies', OVEC's and IKEC's generating stations, as well as supervision of the Fuel Buyers and Fuel Coordinators. The Director and/or Manager obtains specifications, availability, prices, and agreement conditions for fuel, transportation, and reagents. The Director and/or Manager also participates in agreement negotiations as requested and ensures that all pertinent agreements are properly coordinated, monitored, and executed.

The Directors and Managers, along with the Fuel Buyers and Fuel Coordinators, are also responsible for maintaining regular communications with plant employees, fuel suppliers, and transporters to ensure that the terms of executed agreements are being consistently performed.

1.4 General Administrative Duties

The regulated FP organization shall subscribe to or obtain access to a representative number of trade and industry publications and reports by governmental agencies concerning prices for relevant materials and services. Regulated FP shall be knowledgeable of market conditions related to fuel, reagent, and transportation prices and availability. Regulated FP shall maintain appropriate contact with current and potential suppliers, and use other reliable sources of information to maintain a working knowledge of current issues affecting pertinent material or service providers.

The employees of the regulated FP organization, as directed by management, will attend meetings and conferences related to fuel, reagents, and transportation. Regulated FP employees may also be required to participate in regulatory proceedings. These activities are necessary for the effective execution of this procurement policy.

To help assure that current and anticipated requirements for fuel and reagents are met, regulated FP personnel and management shall maintain adequate communications within the regulated FP organization, AEPSC, and its regulated operating companies, as well as OVEC and IKEC.

Regulated FP shall periodically review and consider changes, as necessary, to this policy.

2.0 Regulated FP Policy and Procedures and Implementation

2.1 Business Ethics and Corporate Compliance

Regulated FP employees shall be committed to high standards of business ethics and shall adhere to any and all applicable guidelines provided through *AEP's Principles of Business Conduct*. A copy of this document is provided as Appendix B to this document.

2.2 Regulated FP Considerations

AEP's overall Fuel Procurement Policy shall be used to secure adequate supplies of competitively-priced coal, natural gas, reagents, fuel oil, and transportation services to meet generation, environmental, and operational requirements, while recognizing the dynamic nature of the various associated markets, environmental standards, and regulatory requirements. To accomplish these objectives the Company maintains, as appropriate, a mix of physical inventories and a portfolio of long-term and short-term agreements for firm and discretionary supplies of fuels, reagents, and transportation suitable for its generating units. AEP's procurement strategy is to provide an appropriate amount of fuel, reagents, and transportation with optimal supply flexibility, considering the Company's long-term agreements and market conditions. It is also the policy of regulated FP to meet these materials and service requirements at the lowest reasonable delivered cost over time, consistent with satisfying the above-stated objectives.

Those responsible for the procurement of commodities and services shall be organized and staffed to carry out the procurement of coal, natural gas, reagents, fuel oil, and transportation in an efficient and practical manner. All commodities and services shall be purchased with due consideration of all relevant factors, including but not limited to: competitive pricing, the quantity needed to maintain an appropriate supply, the quality required to optimize the operating characteristics of the generating stations, the need to meet any applicable environmental standards, the production capability as well as the financial reliability of the supplier, existing contractual obligations, and the ability to address emergencies or other unusual circumstances.

2.3 Proper Inventory Levels

The primary objective of the regulated FP organization shall be to ensure the availability of an adequate, reliable supply of fuel and reagents at the lowest, reasonable delivered cost for the generation of electricity. Consequently, decisions affecting solid fuel, fuel oil and reagent¹ inventories shall be made

¹ None of the natural-gas fired generating facilities owned by AEP currently have the ability to maintain natural gas inventories. These plants maintain a proper supply of fuel through a portfolio of firm and interruptible gas supply and delivery contracts.

in consideration of this primary objective. This policy shall allow for flexibility, permitting physical inventory levels of solid fuel, fuel oil, and reagents to be responsive to known and anticipated changes in conditions. Fuel and reagent inventory target levels shall be recommended by a Generation cross-functional team and subject to the approval of senior management. This inventory target determination process helps ensure that each plant's needs are given due consideration and promotes efficiency of operation.

Should the inventory of any one generating station vary significantly from the inventory level deemed appropriate, or should other variables (such as pending transportation issues, labor disruptions, contract disputes, weather, maintenance, etc.) present difficulties, then an appropriate course of action shall be implemented.

Other organizations within AEP that are responsible for developing financial and generation forecasts and the regulated FP organization, as applicable, shall participate in the preparation of the short-term, annual, and/or long-range projections for plant fuel, transportation, and reagent requirements. These projected requirements shall consider varying operational and environmental requirements.

Regulated FP considers the overall economic and reliable supply balance between long-term, short-term, and spot agreements for fuel and reagents when making purchases. Additionally, regulated FP also considers current and projected system requirements; current and reasonably foreseeable market conditions; weather and seasonal conditions affecting production, consumption, transportation; any anticipated shortfall of existing supply agreement shipments; and anticipated changes in spot market prices when making purchases. Given existing contractual arrangements; contract expiration dates; existing and anticipated demand for electrical energy; status of inventory levels; changes to existing federal and/or state environmental standards or other laws; overall market conditions; and other temporary or long-term factors affecting procurement and transportation decisions; the mix of long-term and spot agreement purchases may be reasonably expected to vary given the particular circumstances of each generating plant.

3.0 Regulated Fuel Procurement Methods and Documentation

The use of the P&Ps may be reflected in one or more of the following:

3.1 Requests for Proposal (RFP)

When appropriate, and under the direction of the VP of regulated FP, RFPs should be issued to seek as many competitive offers as possible to obtain the

lowest reasonable delivered cost, over time, for a service or material². RFPs can be sought for long-term contracts or spot orders, and should be used whenever it is practical to do so. The RFP is sent to any number of qualified suppliers to competitively procure the material or service needed.

Any purchase decision resulting from responses to an RFP is documented in a manner to demonstrate that the Company acted prudently in procuring the commodity or service. This documentation includes an analysis of the offers received, and an explanation of the rationale used in awarding a contract.

3.2 Other Non-Solicited Offer Evaluation

At times, the regulated FP organization may be approached with unsolicited offers for commodities or services that warrant consideration, whether they are for short or long-term agreements. When considering these types of offers, regulated FP may use market-based indices, other contract prices, or other reasonable methods of comparison to determine whether or not it would be prudent to accept such an offer.

In the case that one of these types of offers is accepted, documentation is prepared describing the manner in which the offer was received, and also the rationale used to determine that the offer was reasonable. This documentation provides evidence that the action taken on behalf of the Company was prudent.

3.3 Emergency Procurement

Any one or more of the approaches described in this policy may be waived whenever it is determined that fuel or reagents must be purchased, or transportation services acquired, due to immediate and unavoidable circumstances that are not conducive to normal procurement practices. This determination shall be made by the VP in regulated FP, with the concurrence of the SVP of Commercial Operations and other senior management as needed. Situations that could potentially lead to emergency actions may include, but are not limited to:

- Emergency or other extraordinary conditions or circumstances that make it reasonably certain that an adequate supply of acceptable fuel or reagents cannot be obtained from existing agreements and/or spot purchase suppliers.
- Inability to obtain appropriate quantities to cover unanticipated shortages of fuel or reagents that meet minimum quality requirements in a timely fashion using typical procurement practices.

² It should be noted that state regulatory commissions may have their own rules regarding the competitive procurement of fuels for power plants under its jurisdiction. This policy is not meant to supplant those state-specific requirements.

- Lengthy transportation related delays or suspensions.

3.4 Coal and Reagent Quality Specifications and Compliance

Permissible coal specifications and sources for AEP's regulated operating companies' plants, as well as OVEC's and IKEC's plants, have been defined by Steam Generation Equipment Engineering (SGEE). The regulated FP organization utilizes these specifications and sources when soliciting coal offers from suppliers. When coal offers are being evaluated within the quality specification band, coal quality specifications are considered and financial adjustments made to provide a comparison on a like basis, which results in an "as delivered" cents per MMBTu cost. Acceptable mines are included in coal supply contracts. New sources are periodically considered through test burns to expand the choice of coal for each unit, which may produce more favorable financial results. Such sources must be approved by SGEE prior to continued use beyond the test burns.

Permissible reagent specifications and sources for AEP's regulated operating companies' plants, as well as OVEC's and IKEC's plants, are defined by GET Engineering FGD Systems & Chemical Engineering. Reagent proposals consider a number of parameters which may include, among other things, performance guarantees, profitability, quality of service, past experience, financial qualifications and other factors deemed appropriate.

3.5 Negotiating Responsibility

The responsibility for negotiating final terms and provisions of fuel, reagent, and transportation agreements shall be a team effort under the overall guidance of the VP of regulated FP. A negotiating team could be comprised of any or all of the following individuals, depending on the type of agreement to be negotiated:

- VP Fuel Procurement (regulated)
- Director, Coal, Transportation, Reagents
- Manager - Coal
- Manager - Coal Transportation, Logistics & Railcar Fleet
- Manager - Reagents & Coal Combustion Products
- Managing Director, Boat Operations
- Manager - Natural Gas & Fuel Oil

While all contractual documents are reviewed by AEP's Legal Department, a negotiating team may call upon other departments (e.g. Credit, Strategic Initiatives, Fundamentals, Regulatory, etc.) as needed to participate in or

offer their expertise as to certain segments of the negotiations that relate to their particular area of expertise. This flexible approach gives each negotiating team a distinct advantage of providing specialists to the agreement development process who are most proficient in developing, recommending, and negotiating terms that are beneficial to the AEP regulated operating companies and ratepayers, OVEC and IKEC.

3.6 Enforcement of Agreements

Supplier obligations under fuel, reagent, and transportation supply agreements shall be administered to ensure compliance by the suppliers and transporters consistent with AEP's regulated Fuel Procurement Policy and Procedures. The regulated FP organization shall act judiciously, with due consideration of the desire to achieve compliance by the supplier as well as the need to maintain adequate supplies of fuel and reagents to meet plant and system requirements. Such compliance includes coal quality specification adherence as discussed in section 3.4.

If it is determined that a dispute related to a supplier's or transporter's non-performance is unlikely to result in an amicable resolution, the matter shall be referred to the VP of regulated FP. The VP shall undertake the appropriate action, including further negotiation or arbitration, if provided for by the agreement.

If the VP of regulated FP finds that an amicable resolution to a supplier's or transporter's non-performance cannot be achieved, litigation may be pursued with the involvement of AEP's Legal department and under the guidance of other appropriate senior management.

4.0 Hedging Policy

4.1 Hedging Definition

A fuel hedge, as defined by AEP, is a forward contract that either serves to lock in the price of fuel for a specific volume and quality, or provides the ability to do the same by the use of put and call options³. Such transactions may be settled either financially or physically. A financially settled transaction results in a net gain or loss, while physically settled contracts result in actual fuel deliveries at the agreed upon price terms. Fuel hedges are to be used as tools to mitigate volatility in fuel purchase costs relative to market volatility.

³ There is special accounting criteria for hedging with options, for example written options rarely qualify for hedge accounting. Incorporating options in an accounting hedge strategy are fully discussed with Financial Policy and Transaction Analysis prior to execution.

4.2 Hedging Strategy

To support AEP's key business objectives, the regulated FP organization may enter into fuel hedges, when appropriate, with the purpose of reducing fuel price volatility. Regulated FP's primary means of hedging to reduce fuel price volatility is through a portfolio of physical supply agreements of various durations. Maintenance of such a portfolio ensures less volatile fuel prices than a market may bear, while allowing some flexibility in taking advantage of shorter-term pricing options as they become available.

Regulated FP is not currently active in entering into financial fuel hedge transactions because these transactions, while they may decrease fuel price volatility, also have gains, losses, and associated costs. However, regulated FP has and will continue to evaluate hedging opportunities that would be settled financially. Implementation of specific operating company hedging programs would be subject to the appropriate regulatory approvals and cost recovery mechanisms.

5.0 Contract Administration

5.1 Overview and Responsibilities

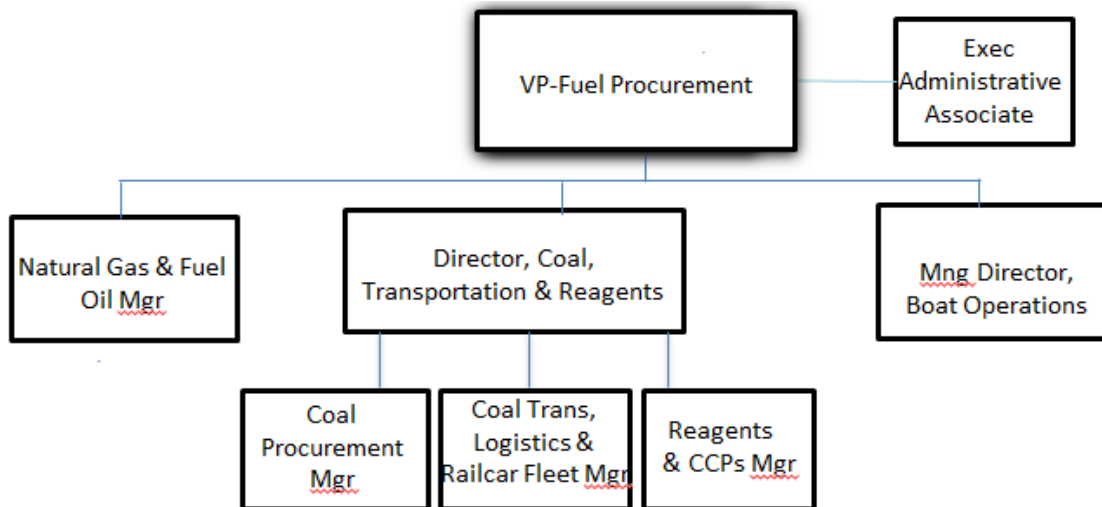
Contract administration of existing and proposed contractual agreements for the purchase and sale of coal, fuel oil, natural gas, reagents, and related transportation agreements, as well as for ash marketing, made by regulated FP on behalf of AEP's regulated operating companies, OVEC and IKEC, is performed by the Energy Contracts & Confirmations group within Enterprise & Credit Risk Management. This group closely interacts with regulated FP Directors and Managers, Legal, Credit, Fuel Accounting, Audits, Regulatory Services, and power plant personnel to ensure that contractual agreements represent the intended business relationship between the parties, and to monitor the regulated operating companies' rights and obligations under existing agreements. Contract administration support services include, but are not limited to:

- Developing and/or reviewing contractual documents under existing and proposed agreements;
- Document tracking, distribution and retention;
- Monitoring contractual deadlines regarding volume elections, price reopeners, and term extension elections; issuing written notices to counterparties reflecting regulated FP option decisions;
- Determining contract value through pricing and rate development;

- Providing contractual review, including analysis of proposed settlements, changes in law, governmental impositions, and other pricing claims;
- Administering data requirements for internal fuel management systems which provide database of historical costs and volumes for invoice support and reporting requirements;
- Monitoring and reporting volume commitment status and tiered pricing under transportation agreements;
- Administering coal scale calibration adjustments including determination of any pricing adjustments that may be applicable;
- Providing coal, reagent, fuel oil, natural gas, and transportation contract data for state and federal regulatory filings as needed;
- Administering Force Majeure claims initiated by regulated FP or counter parties;
- Providing accrual recommendations to the group responsible for fuel accounting.

Appendix A:
American Electric Power
Regulated Fuel Procurement Organizational Chart

American Electric Power
Organizational Chart - Regulated Fuel Procurement



Appendix B:
AEP's Principles of Business Conduct



At AEP, we believe in doing the right thing every time for our customers, each other and our future.



INTRODUCTION FROM OUR CEO

1.0 PRINCIPLES OF BUSINESS CONDUCT OVERVIEW

- 1.1 Our Culture
- 1.2 What You Should Expect
- 1.3 What Is Expected Of You
- 1.4 Expectations of All Leaders
- 1.5 Office of Ethics & Compliance

2.0 BUILDING THE RIGHT WORK CULTURE

- 2.1 Workplace Conduct
- 2.2 Workplace Safety
- 2.3 Environmental Stewardship

3.0 OUR RELATIONSHIPS

- 3.1 Respect for Others
- 3.2 Customer Focus
- 3.3 Conflicts of Interest
- 3.4 Business Opportunities
- 3.5 Bribes and Kickbacks
- 3.6 Gifts and Entertainment
- 3.7 Fraud
- 3.8 FERC Standards of Conduct & Affiliate Restrictions
- 3.9 Supplier Diversity
- 3.10 Anti-Trust

4.0 OUR ASSETS

- 4.1 Financial Records, Reporting and Internal Controls (Intercompany Relations and SEC Reporting)
- 4.2 Security and NERC Critical Infrastructure Protection
- 4.3 Confidential Information
- 4.4 PII
- 4.5 Intellectual Property
- 4.6 Enterprise Content Management
- 4.7 Appropriate Use of Company Assets

5.0 OUR IMAGE

- 5.1 Public Communications
- 5.2 Social Media
- 5.3 Insider Information and Trading Activities
- 5.4 Political Participation
- 5.5 Political Contributions
- 5.6 Government Relations
- 5.7 Sustainability

6.0 REPORTING CONCERNS

- 6.1 Should I Report?
- 6.2 How Do I Report?
- 6.3 How Does the Concerns Line Work?
- 6.4 Retaliation



Dear Fellow Employees:

Our brand is our most valuable asset. It is defined by every point of contact that every stakeholder has with us. The foundation of our brand is our belief that we do the right thing every time for our customers, each other and our future.

AEP's Principles of Business Conduct outline how we live this belief through our behavior each and every day. We all share responsibility for protecting AEP's brand and reputation. The Principles guide us in carrying out this responsibility and define both the ethical and legal standards by which we operate. No matter our role and responsibilities, we must act in accordance with only the highest standards of business. None of us should accept anything less.

The standards and expectations outlined in this booklet will help you understand AEP's policies, standards and expectations. They will help you determine the supporting behaviors. Please use this book as your reference for the manner in which you carry out your work and how you treat others.

Our Principles of Business Conduct is our guidepost as we strive to power a new and brighter future for our customers and communities.

Nick Akins
Chairman, President and Chief Executive Officer



PRINCIPLES OF BUSINESS CONDUCT OVERVIEW

- | | | | |
|-----|-------------------------|-----|-------------------------------|
| 1.1 | OUR CULTURE | 1.4 | EXPECTATIONS OF ALL LEADERS |
| 1.2 | WHAT YOU SHOULD EXPECT | 1.5 | OFFICE OF ETHICS & COMPLIANCE |
| 1.3 | WHAT IS EXPECTED OF YOU | | |

1.1 OUR CULTURE

At AEP, we believe in doing the right thing every time for our customers, each other and our future.

OUR CUSTOMERS

- › Connect with our customers.
- › Deliver value.
- › Be easy to work with.
- › Strengthen our communities.

EACH OTHER

- › Pursue Zero Harm.
- › Be accountable.
- › Assume positive intent.
- › Embrace diversity.

OUR FUTURE

- › Stay curious and innovate.
- › Protect our environment.
- › Grow our business.
- › Be adaptable.



1.2 WHAT YOU SHOULD EXPECT

As an AEP employee, you have every right to demand that the company and your co-workers uphold the highest of ethical standards. AEP's management tone is one of uncompromising integrity and highest ethical standards.

1.3 WHAT IS EXPECTED OF YOU

AEP expects all employees to behave ethically and legally according to the company's Principles of Business Conduct. Because we hold each other responsible for our actions, it is your responsibility to ask questions, raise concerns or report potential violations. You are also expected to fully cooperate with internal investigations into potential violations or wrongdoing as well as any investigation conducted by a third party on behalf of AEP.

AEP expects employees to behave with integrity and regards a violation of the Principles of Business Conduct as a serious matter. Anyone who violates the policies described in the Principles of Business Conduct will be subject to disciplinary action up to and including termination.

Nothing in the Principles of Business Conduct, nor in any other company policy, prevents you from communicating, cooperating or filing a complaint with any governmental agency or authority. For additional information, see [AEP's Whistleblower Protection Policy](#) and Policy on Retaliation Against Employees.



1.4 EXPECTATIONS OF ALL LEADERS

Leaders at AEP are expected to create an atmosphere where employees feel valued, safe and respected. As a leader, you are also expected to support a culture of compliance where employees can report concerns and potential violations without fear of retaliation. AEP's leaders manage by motivation, not intimidation, and must clearly demonstrate AEP's commitment to compliance with the Principles of Business Conduct through actions and behaviors.

1.5 OFFICE OF ETHICS & COMPLIANCE

In addition to monitoring and enforcing employees' legal and ethical compliance, [AEP's Office of Ethics & Compliance](#) is committed to raising the level of awareness of all AEP employees about the importance of ethics and compliance in the workplace. AEP's Ethics & Compliance group administers AEP's ethics and compliance program. The Chief Compliance Officer meets regularly with AEP's Chief Executive Officer and Board of Directors' corporate governance committee.

An effective ethics and compliance program promotes an organizational culture that encourages the highest ethical standards of business conduct and a commitment to compliance with the law.





2.1 WORKPLACE CONDUCT
& INCLUSION
2.2 WORKPLACE SAFETY

2.3 ENVIRONMENTAL STEWARDSHIP

2.1 WORKPLACE CONDUCT & INCLUSION

AEP is committed to providing an inclusive workplace where discrimination and harassment are not tolerated. Employment-related decisions such as training, hiring, disciplining, compensation and promotions will be made regardless of race, color, religion, gender, age, national origin, veteran status, disability or sexual orientation. We expect our employees to conduct themselves in a manner that contributes to a healthy, safe and productive work environment. Harassment of any kind will not be tolerated. You are expected to support AEP's inclusive culture and comply with the Rules of Conduct found in [AEP's Employee Handbook](#).

2.2 WORKPLACE SAFETY

Safety is the primary cornerstone of our business. No aspect of operations is more important than the health and safety of our employees and customers. AEP manages our facilities in compliance with all applicable health and safety regulations. For us to do so, everyone at our facilities must follow all of our safety instructions and procedures.

To report an unsafe condition, please contact AEP's Hazard Line 1-888-AEP-ASAP (1-888-237-2727), talk to your local manager or contact AEP's Concerns Line at 1-800-750-5001 or online at www.aepconcernsline.com.



WHAT TO DO

- ▶ Demonstrate a commitment to safety by looking out for each other.
- ▶ Show mutual care for the health and well-being of others.



ZERO HARMSM



2.3 ENVIRONMENTAL STEWARDSHIP

We are committed to protecting the environment and conducting our business in an environmentally sustainable manner. Employee awareness of and dedication to compliance with applicable environmental requirements are the keys to meeting our legal obligations and protecting the environment today and for generations to come.

Achieving environmental excellence depends on the individual efforts of thousands of AEP employees working together with a shared commitment to environmental protection and enhancement.

All employees are expected to assume responsibility for environmental protection and will be held accountable for willful violations of environmental laws or regulations.



WHAT TO DO

- ▶ Be a good corporate citizen and environmental steward.
- ▶ Be familiar with and follow the environmental regulations, policies and procedures that apply to your job.
- ▶ Dispose of waste materials legally and in a way that meets our environmental standards.
- ▶ Take action as appropriate to quickly address instances of environmental spills or equipment upsets to minimize impacts on the environment.



- | | | | |
|-----|-------------------------|------|--|
| 3.1 | RESPECT FOR OTHERS | 3.7 | FRAUD |
| 3.2 | CUSTOMER FOCUS | 3.8 | FERC STANDARDS OF CONDUCT & AFFILIATE RESTRICTIONS |
| 3.3 | CONFLICTS OF INTEREST | 3.9 | SUPPLIER DIVERSITY |
| 3.4 | BUSINESS OPPORTUNITIES | 3.10 | ANTITRUST |
| 3.5 | BRIBES AND KICKBACKS | | |
| 3.6 | GIFTS AND ENTERTAINMENT | | |

3.1 RESPECT FOR OTHERS

A great part of our success is grounded in our open and collaborative work environment which helps us achieve excellence and meet the needs of our customers. We are and must be professional and honest with our colleagues, customers and business partners and treat each other with high respect and regard. AEP will not tolerate harassment of any kind.

HOW TO MAINTAIN **INTEGRITY** IN THE WORKPLACE

- ▶ Do the right thing every time.
- ▶ Value the diversity of people which, includes their ideas and contributions generated from unique perspectives.
- ▶ Treat people with respect. Avoid any actions that someone might interpret as intimidation or bullying.
- ▶ Remember that what you find acceptable or funny may be offensive to others or in other cultures.



TELL ME **MORE**

Harassment is conduct that is intimidating, offensive, demeaning or hostile or that unreasonably interferes with work, such as:

- ▶ Jokes or insults about race.
- ▶ Teasing a colleague about their religion.
- ▶ Disparaging remarks about someone's nationality.
- ▶ Sharing unsolicited opinions about sexual orientation.
- ▶ Unwelcome sexual advances or requests.
- ▶ Sexually explicit gestures or posters.

3.2 CUSTOMER FOCUS

A key to AEP's business success lies in our ability to please our customers by meeting their needs in ways that improve their quality of life. This includes delivering safe, efficient and reliable services of consistently high value and promoting our products truthfully. If we please our customers, we will please our regulators, and our financial results will reward shareholders and our employees. AEP depends on long-term, continuing relationships with satisfied customers.

Cultivating a reputation of honest, compassionate and respectful communication is fundamental to this long-range approach.



HOW TO MAINTAIN CUSTOMER FOCUS

- ▶ Listen to our customers.
- ▶ Deliver value to our customers.
- ▶ Consider the customer impact of our decisions.



3.3

CONFLICTS OF INTEREST



Conflicts of interest arise when an employee uses his/her position or responsibilities at AEP for personal gain. A conflict also arises when an employee's personal interests influence the employee's professional conduct for the benefit of a personal friend or immediate family member. Employees, individually or in collusion with others, must avoid any business, financial or other relationship in which personal interests conflict with, or appear to conflict with, the interests of AEP or its shareholders.

A "financial relationship" is one that is significant enough to affect an individual's activities. It does not cover an employee's interest as a stock holder in companies whose securities are listed on any national securities exchange.

Examples of potential conflicts of interest are: taking outside employment, investing or involving yourself with another

company in competition with AEP; investing or involving yourself with another company that supplies goods and services to AEP; and accepting gifts, payments or loans conferred as a result of your position with AEP. These activities should be undertaken with great caution or should be avoided altogether.

Prior approval is required before any employee can perform work or services for, or have a financial interest in, an outside entity that does or seeks to do business with AEP (other than as a customer of AEP) or that competes with services provided by AEP. In no event should an employee be in a position to approve the work for a company where a conflict exists.



Employees with potential conflicts of interest must notify their supervisors or Ethics & Compliance.

AVOID

HOW TO

A CONFLICT OF INTEREST

- ▶ Be transparent about your outside activities and relationships and watch for situations where they might interfere with your work or make it difficult for you to be objective.
- ▶ Do not use your position at AEP to benefit yourself or your friends or family members.
- ▶ Never pursue (for yourself or others) business or corporate opportunities that you learned about in your work at AEP or through the use of company property or information.



If you think you face an actual or potential conflict of interest, discuss it right away with your manager or Ethics & Compliance.

EXAMPLES OF POTENTIAL CONFLICT OF INTEREST

- ▶ A close family member or close friend works for an organization that does business or wants to do business with AEP or competes with us.
- ▶ You use company resources for your personal benefit or for the personal benefit of someone else.
- ▶ You supervise or are supervised (directly or indirectly) by a family member or close friend.
- ▶ You are offered a gift or entertainment that is excessive or that might influence – or appear to influence – your business decisions.



THINKING IT THROUGH

Conflicts of interest are not always obvious. If you face a situation in which it looks like a conflict of interest may exist, ask yourself these questions:

- ▶ Would the situation, or the relationship, affect my decisions at AEP?
- ▶ Would I be putting my personal interest, or the interest of someone close to me, ahead of the company's?
- ▶ Would I be embarrassed if someone at AEP knew all the facts?
- ▶ Do I, or does someone close to me, gain anything from my potentially divided loyalty?
- ▶ Would other people think that the situation, or relationship, might affect how I do my job?
- ▶ Would a customer or supplier wonder if we treated them fairly?

3.4

BUSINESS OPPORTUNITIES

Every employee should deal fairly with our customers, vendors, competitors and fellow employees. You should not take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts or any other unfair-dealing practice.

You must not use AEP property, information or your position for personal gain or to compete with AEP. Any business venture or opportunity that you learn about or develop in the course of your employment that is related to any current or prospective business of AEP belongs solely to AEP. You may not take the opportunity for yourself.



3.5

BRIBES AND KICKBACKS



AEP depends on vendors and suppliers to help it accomplish work objectives. Building and maintaining healthy business relationships with vendors starts with a procurement process that is open and fair and emphasizes competitive bidding.

AEP expects the highest standards of personal conduct and business ethics from every employee who is directly involved in buying goods and services or who is in a position to influence purchasing decisions.

All employees involved in the buying or contracting process should ensure that their actions with vendors are fair and comply with the [company's procurement policies](#).

No bribes, kickbacks or other improper payments may be exchanged for the purpose of obtaining or retaining business for AEP.



TELL ME MORE

"Bribe" means offering (or accepting) anything of value for the purpose of influencing a business decision or securing any kind of improper advantage. A bribe is not just a suitcase of cash. Bribes may include:

- ▶ Gifts, especially gifts that are expensive.
- ▶ Entertainment, hospitality and/or travel that is beyond reasonable business needs.
- ▶ Personal services, favors or loans.
- ▶ Charitable or political contributions.
- ▶ Payments or benefits for services for an individual's family members.
- ▶ Payments or benefits or services including kickbacks to a "facilitator."

Many laws or policies prohibit or limit employees furnishing meals, gratuities, entertainment or anything else of value to government officials or employees or to candidates for any public office. Employees responsible for contracts with government agencies — be they local, state, federal or foreign — must be familiar with, and abide by, these laws and policies. In addition, employees must comply with all applicable lobbyist registration and reporting requirements.

WHAT TO DO TO AVOID BRIBERY & CORRUPTION

- ▶ Know and follow our anti-corruption policies and all relevant anti-corruption laws. Remember that many anti-bribery laws have severe penalties and apply wherever we do business.
- ▶ Never offer, give or promise anything of value (no matter how small) to influence a business decision or obtain a business advantage.
- ▶ Never ask for or accept a bribe.
- ▶ Use care and follow our policies and procedures on retaining third-party business associates, and properly supervise their activities.
- ▶ Never ask anyone else to do something that the law or our policies prohibit you from doing.
- ▶ Make sure that all payments, benefits or favors are fully, honestly and accurately reflected in the company's books and records. Never attempt to conceal or misrepresent a payment or an expenditure.
- ▶ Contact the [AEP Legal Department](#) for guidance if you have any questions or concerns about bribery laws or our policies or whether a gift or payment would be unlawful or inappropriate.



3.6 GIFTS AND ENTERTAINMENT



Small gifts and business-related entertainment (including meals) can build goodwill and help develop business relationships. They can also raise questions about personal integrity or may appear to create an unfair business advantage. Because of this, we must always use good judgment when deciding whether to offer or accept a gift or business-related entertainment.

Gifts not meeting the outlined criteria must be returned to the donor, along with an explanation. If perishable, the gift should be donated to a charitable organization and the donor notified.

REQUIRED CRITERIA TO ACCEPT GIFT/ENTERTAINMENT:

- ▶ It is consistent with good business practices.
- ▶ It cannot be construed as a business inducement.
- ▶ It is of nominal value.
- ▶ You are able to reciprocate.
- ▶ It would not be embarrassing to AEP if it were disclosed to the public.
- ▶ It adheres to your specific business unit policy.



CONSIDER THIS

As a rule, an occasional gift of a promotional item or an item with a nominal value is generally allowed. AEP prohibits offering or accepting any gift or entertainment that may be deemed:

- ▶ Entertainment, hospitality or travel that has no clear business purpose or a gift or entertainment that is beyond reasonable business needs.
- ▶ Personal services, favors or loans.
- ▶ Charitable or political contributions.
- ▶ Payments or benefits to or services for an individual's family members.
- ▶ Offered as a "quid pro quo" (offered for something in return).
- ▶ Lavish or extravagant.
- ▶ Likely to reflect negatively on our reputation.
- ▶ In violation of applicable law or the policies of the giver or the recipient.

AEP recognizes that, under certain circumstances, providing or accepting invitations to functions that involve travel or overnight stays could be in AEP's best interest and contribute to good working relationships with customers or vendors.

- ▶ To the extent practical, AEP will pay travel expenses for you to participate in vendor-sponsored trips and activities.
- ▶ Your supervisor must approve your attendance at these functions.

Continued: Gifts and Entertainment



Check with your supervisor before accepting or offering any gift because requirements/policies may vary depending on business units.

3.7 FRAUD



Fraud is the false representation or concealment of a material fact with the intent of personal gain and/or improving the company's image or standing.

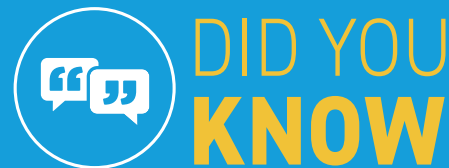
Fraud also includes intentionally preparing or submitting financial statements that could make the company look better even if there is no direct benefit to the employee.

Examples of fraudulent actions:

- ▶ Forgery or alteration of any document or account belonging to the company.
- ▶ Forgery or alteration of a check, bank draft or any other financial document.
- ▶ False representation of facts to allow misappropriation of funds, securities, supplies or other assets.
- ▶ Impropriety in the handling or reporting of money or financial transactions.
- ▶ Profiting from insider knowledge or company activities.
- ▶ Intentionally disclosing confidential and proprietary information or falsifying information to outside parties.
- ▶ Accepting or seeking anything from customers, contractors, vendors or competitors in exchange for providing proprietary information or other inappropriate favors.



Any employee who is witness to a suspected fraud is responsible for immediately reporting it to an appropriate member of management, or to a Vice President or Director within Audit Services or Human Resources or to the Chief Compliance Officer and Ethics & Compliance.



Some common examples of fraud include:

- ▶ Misrepresentation of health insurance data.
- ▶ Misuse of corporate credit/fuel cards.
- ▶ Theft or unauthorized use of company-wide assets, including office supplies and tools.
- ▶ Falsification of time sheets, which includes misrepresentation of overtime and sick time.

3.8

FERC STANDARDS OF CONDUCT & AFFILIATE RESTRICTIONS

The Federal Energy Regulatory Commission (FERC) Affiliate Restrictions govern what can and cannot be shared between employees of AEP's traditional (regulated) operation companies and those of AEP's competitive (market regulated) power Marketing Affiliates, including competitive generation.

AEP complies with the Affiliate Restrictions and Standards of Conduct regulations through the joint efforts of all transmission and marketing function employees. Steps we have taken include:

- ▶ Transmission and marketing function personnel are physically separated, and marketing function personnel do not have electronic or physical access to transmission facilities or non-public transmission function information.
- ▶ AEP's market-regulated power sales affiliate personnel are physically separated from the employees of the franchised public utilities with captive customers and have no electronic or physical access to the facilities or non-public market information of the franchised public utilities with captive customers.



THINKING IT THROUGH

- ▶ "No-Conduit Rule" is when some Service Corp. employees provide services to both Operating Companies, Marketing Affiliate employees, and business segments, and could come in contact with market information. That's OK, provided the information is not inappropriately passed along between Operating Company and Marketing Affiliate.
- ▶ A "transmission provider" is any public utility that owns, operates or controls facilities used for the transmission of electric energy in interstate commerce.
- ▶ "Transmission functions" means the planning, directing, organizing or carrying out of day-to-day transmission operations, including the granting and denying of transmission service requests.
- ▶ "Marketing functions" generally means the sale for resale in interstate commerce, or the submission of offers to sell in interstate commerce, of electric energy or capacity, demand response, virtual transactions, or financial or physical transmission rights.

3.9 SUPPLIER DIVERSITY

SUPPLIER DIVERSITY IS A KEY ELEMENT OF OUR SUPPLY CHAIN STRATEGY

AEP values competitive access in our supply chain as we strive to engage our customers as our business partners.

We will achieve these goals by:

- ▶ Generating strategic partnerships with qualified and certified firms owned by minorities, women, veterans and service-disabled veterans.
- ▶ Strategically sourcing goods and services that meet AEP's specifications without compromising performance expectations.
- ▶ Promoting strategic communications with minority and women's trade groups for developing and expanding small business capacity.





TELL ME MORE

WHO ARE DIVERSE SUPPLIERS?

- › Women-owned businesses.*
- › Minority-owned businesses.*
- › Hispanic-, African American-, Asian-, Native American-, owned businesses.*
- › Veteran-owned businesses.*
- › Small businesses (for governmental compliance only).

*Diversity status is determined by ownership percentage and revenue for the market.



Encourage diverse suppliers at conferences, trade shows, etc., to register in AEP's supplier registration tool

<http://www.aep.com/about/b2b/suppliers/>



HOW CAN YOU HELP

- › Embrace AEP's continuing message of the importance of diversity and inclusion.
- › Commit to support and strengthen AEP's diverse supply base.
 - › Understand where we have diverse suppliers today and where opportunities exist to introduce them to AEP.
 - › Support AEP's mission to develop new suppliers on how to do business with AEP.
- › Work with Procurement to include diverse suppliers in sourcing/bid opportunities.
- › Increase opportunities with current diverse suppliers.

3.10 ANTITRUST



Antitrust laws are designed to promote a vibrant free market. All employees are responsible for ensuring that our business is conducted in compliance with state and federal antitrust laws.



I am attending a utility group seminar. Is it OK to discuss our safety culture and our strategy for expanding into new markets?



It is great to share safety practices and strategy so we can all improve the safety of our workplace; however, sharing specific information regarding product and geographic strategy may violate antitrust laws. Any publicly shared information regarding AEP's corporate strategy may be generally discussed. Check with the AEP Legal Department with any questions.



TELL ME MORE

Never make agreements or exchange information or discuss the following topics with a competitor:

- ▶ Price, including any component of price (such as current or proposed fees, surcharges or discounts), for sales or purchases.
- ▶ Terms and conditions of sale or purchase.
- ▶ Cost.
- ▶ Profit margins.
- ▶ Employment practices.
- ▶ Sales or marketing plans.
- ▶ Bidding plans, including the amount of a bid, who should win or lose bidding, or who will or will not bid.
- ▶ Destroying another competitor (such as through below-cost pricing).
- ▶ Boycotting or otherwise refusing to do business with any third party, such as a customer, a supplier or another competitor.

Never use a customer or any other person as an intermediary to exchange company-sensitive information with competitors. Contact the [AEP Legal Department](#) if you suspect a customer or other person is providing a competitor with AEP's sensitive information.



4.1	FINANCIAL RECORDS, REPORTING AND INTERNAL CONTROLS (INTERCOMPANY TRANSACTIONS AND SEC REPORTING)	4.4	PII
4.2	SECURITY AND NERC CRITICAL INFRASTRUCTURE PROTECTION	4.5	INTELLECTUAL PROPERTY
4.3	CONFIDENTIAL INFORMATION	4.6	ENTERPRISE CONTENT MANAGEMENT
		4.7	APPROPRIATE USE OF COMPANY ASSETS

4.1 FINANCIAL RECORDS, REPORTING AND INTERNAL CONTROLS (INTERCOMPANY TRANSACTIONS AND SEC REPORTING)



Many people inside and outside of AEP have an interest in AEP's operations. They rely on the timeliness, accuracy and integrity of our financial information to make important transactions or financial decisions. External parties that rely on our financial information include regulatory commissions, debt and equity investors, insurance carriers, environmental agencies, and vendors.

We all share responsibility for detecting and preventing fraud and other inappropriate conduct. Immediately report any suspected fraud to an appropriate member of management, Audit Services, Ethics & Compliance, Legal or Human Resources. Suspected fraud also can be reported confidentially and anonymously through the **AEP Concerns Line at 1-800-750-5001**. For additional information, please review [AEP's Anti-Fraud Policy](#).



WHAT TO DO

- ▶ Be sure that the information you prepare, process and analyze:
 - ▶ is accurate.
 - ▶ is thorough.
 - ▶ complies with applicable laws, accounting principles and company policies.
- ▶ Never falsify, try to hide or mischaracterize an AEP record.
- ▶ Never attempt to bypass any company procedure or control, even if you think it would be harmless or save time.
- ▶ Always cooperate with our external and internal auditors/investigators.
- ▶ Be familiar with and follow company policies and procedures regarding business records, including requirements to keep and delete or discard business records (see section 4.6).
- ▶ Never destroy records to avoid disclosure in legal proceedings or investigations, and comply with any notice from the [AEP Legal Department](#) that requires you to retain records.

AEP Concerns Line:

1-800-750-5001

INTERCOMPANY TRANSACTIONS

The company's regulated subsidiaries are governed by laws and regulatory rules that regulate transactions between and among them. These laws and rules are intended to prevent cross-subsidies and to avoid the misstatement of expenses and earnings. The AEP Accounting Department or the [AEP Legal Department](#) should be consulted for assistance in these areas.

SEC REPORTING

All AEP employees participating in the preparation of reports or documents filed with or submitted to the Securities and Exchange Commission (SEC) or engaging in public communications made on behalf of AEP shall endeavor to ensure full, fair, accurate, timely and understandable disclosure in reports and documents that AEP files with or submits to the SEC and in other communications made on behalf of AEP.



4.2 SECURITY AND NERC CRITICAL INFRASTRUCTURE PROTECTION



You have a role to play to ensure the security of your co-workers and AEP's assets. The role can vary from keeping your computer password secure to reporting suspicious persons on or around AEP property. That role has grown to include being cautious about how you post both personal and company-related information on social media. You also need to use caution when you receive email from outside AEP.

- ▶ Be cautious of attachments or links included in email you receive from outside AEP. Carefully evaluate the email to confirm who sent the email. When in doubt, don't open the attachment or click on the URL, as it could have hidden malware designed to take control of your computer.
- ▶ Keep personal and AEP items properly secured, and lock your desk when unattended.
- ▶ When traveling, secure laptops and other valuables in an area of your vehicle that is not visible.
- ▶ Always lock unattended vehicles.
- ▶ Always password-lock your computer when away from your desk.

REPORT SECURITY INCIDENTS TO AEP SECURITY EITHER ONLINE OR BY CALLING:

Security Hotline 1.866.747.5845	7 days a week	Audinet 8.200.1337
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Available 24 hours

AEP is subject to the North American Electric Reliability Corporation Critical Infrastructure Protection (NERC CIP) Standards. The standards include extensive requirements for securing utility infrastructure and implementing specific information management policies.

If you work in or have access to a NERC CIP-designated location, you are required to comply with these stringent security standards. Enter a NERC CIP-restricted area only if you are certain that you have approved unescorted access. If you enter with an escort, you must log in and out every time you enter or leave that location. If you are escorting an individual into a NERC CIP-restricted area, know your responsibilities. When in doubt, call the Security Hotline at 1-866-747-5845 (Audinet 8-200-1337).

Government regulations require AEP to report any sabotage events. Because sabotage is difficult to determine, all employees and contractors are encouraged to report any suspicious events to Security. The Physical and Cyber Security teams will investigate to determine if sabotage has occurred.

For additional information or questions, visit online at [Security](#) or [NERC CIP Standards](#).



4.3

CONFIDENTIAL INFORMATION



AEP values security and data privacy. Employees are AEP's most important tool to assure data security. All employees with access to AEP funds, property or information have a responsibility to manage them with the highest level of integrity and to avoid any misuse of these assets. Every precaution should be taken to prevent passing information to unauthorized persons, both inside or outside of AEP, particularly in those areas where confidential information and technologies play a major role in business strategy.



TELL ME MORE

CONFIDENTIAL INFORMATION INCLUDES:

- › Engineering and other technical data.
- › Financial data, including actual and projected earnings and sales figures.
- › Planned new services and products.
- › Advertising and marketing programs.
- › Actual and proposed business plans and strategies.
- › Customer and supplier lists and information, including contract provisions and pricing.
- › Capital investment plans.
- › Product configuration, component specifications, logic diagrams and technical drawings.
- › Test data.
- › Trade secrets, including methods, programs and processes.
- › Employee information, including personal information, compensation data and organizational charts.

4.4 PII

AEP recognizes the importance of having effective and meaningful privacy protections in place when it collects, uses, retains, discloses and/or destroys Personally Identifiable Information ("PII"). These protections are necessary to ensure AEP's own compliance with such laws and to ensure the compliance of contractors, agents and customers who may furnish PII to AEP and/or are themselves subject to local privacy and data protection laws. These protections also help instill confidence in AEP's employees.

AEP applies protective measures when handling PII under its control or in its possession. AEP has a [PII Data Privacy Protection Policy](#) ("Policy") that establishes privacy standards applicable to PII throughout AEP. AEP also complies with local and state privacy and data protection laws or regulations.



If you have access to personal information, take reasonable precautions to protect it from loss or misuse and from unauthorized access, disclosure, alteration and destruction.



WHAT TO DO

- ▶ Know and comply with all applicable privacy and data protection laws, policies and procedures that apply to your job.
- ▶ Respect and maintain the confidentiality and security of personal information collected by or for the company at all times.
- ▶ Never collect or attempt to access personal information about employees, customers or business partners that you do not need to do your job, and never keep such information longer than it is needed.



TELL ME MORE

WHAT IS PII?

An individual's first name or initial with the last name, plus any one of the following:

- › Social Security number
- › Driver's license number
- › State or federal government-issued ID number
- › Passport number
- › Biometric data (including but not limited to fingerprint, DNA, voiceprint or retinal scan)
- › Personal credit card number
- › Bank account or debit card number, along with any required security information or password required for access

WHAT IS NOT PII?

- › Customer account numbers
- › Corporate credit card information
- › Another corporation's bank account number
- › Birth date
- › Employee number
- › Last four digits of a Social Security Number



I am moving offices and have some old documents and binders that I need to discard. I assume I can put it all in the big dumpster bin that Office Services will bring?



If you have documents that contain PII, you will need to shred those in your local shredder or request a secure shredder bin from [Office Services](#).

4.5 INTELLECTUAL PROPERTY



You must safeguard AEP's confidential and proprietary information, trade secrets and other intellectual property (which includes copyrights, trademarks and patents) just as carefully as you protect all other important company property.

Employees must not disclose any information that might compromise proprietary technologies or trade secrets to any unauthorized persons. You also must take reasonable precaution against inadvertently disclosing this information to anyone not authorized to have it.

Just as we expect our intellectual property rights to be observed, we will respect the intellectual property rights of others. You may not intercept, duplicate or gain the intellectual property of others through any means, unless given permission by the intellectual property right holder. Additionally, confidential information provided from outside sources may not be shared until approved by the [AEP Legal Department](#).



DID YOU KNOW

AEP has ownership rights to the inventions, knowledge and employee work products—collectively known as intellectual property—developed in the course of employees' work, on company time and using AEP assets and facilities. AEP will establish and protect its right to such intellectual property.



4.6

ENTERPRISE CONTENT MANAGEMENT



Laws and regulations and AEP policies dictate which records we must retain, how we handle them and how long we must keep them. This consistent approach to records management helps us mitigate risk. [AEP's Records Retention Manual](#) also outlines how records are to be classified and handled according to [AEP's Security Information Classification standards](#).

In addition, some records may be subject to a litigation hold. These may include requests from a government agency, private individual, or corporation as part of a legal proceeding, or the request may be for records that are relevant to pending or anticipated litigation. The AEP Legal Department will advise you on the need to preserve documents and records. A legal hold supersedes any retention requirement specified in our record retention policies. If you have questions regarding the disposition of a particular document, please contact the [AEP Legal Department](#).

4.7

APPROPRIATE USE OF COMPANY ASSETS

AEP has entrusted you with the tools and resources you need to perform your job. Limited personal use of certain company-owned assets is permissible. For example, you may make occasional personal phone calls, or use the internet to check the current news. However, such use should neither be excessive nor interfere with your job. Employees should neither perform, nor be directed to perform, personal work while on company time. Examples include doing personal grocery shopping while picking up company mail or directing a subordinate to pick up your personal vehicle from the repair shop.

You should never use company-owned assets for outside personal business purposes.



DID YOU KNOW

Upon ending your employment at AEP, whether through a new career opportunity at another company, retirement, resignation of your position, or termination, please remember the following:

- ▶ Mass data transfers and removable disk transfers are monitored by IT Security, and E&C is required to retrieve any data, even after you have left the company.
- ▶ DO NOT use an unauthorized removable disk or any similar item to download your workstation or server contents onto.
- ▶ Should you have personal information on your workstation such as photos or documents, contact E&C prior to removal to get authorization.

Continued: Appropriate Use of Company Assets

Occasionally, you may be asked to perform work on behalf of AEP as part of a public service or charitable function. This may involve using company tools, equipment, vehicles or time. Examples may include installing lighting at a Little League baseball field or using your company computer to present a slideshow at a United Way meeting. Please be sure to fully disclose this activity and obtain prior approval from your manager.

You may never use AEP's assets or the AEP network to view, send, store or print pornographic or similarly offensive material. These may include any materials containing racial, ethnic, religious or sexist slurs or epithets. Any employee found to have engaged in such activities will be subject to disciplinary action, up to and including termination on the first offense. AEP monitors activity on company-owned assets and across AEP's networks. This includes emails, visits to websites, and other forms of



traffic, even through a personal device connected to AEP's network. For more information or questions, please review [AEP's Prohibition Against Pornography and Offensive Material Policy](#).



THINKING IT THROUGH

Examples of inappropriate use of assets using your computer/supplies/time:

- ▶ Tax preparation, for multiple people or for profit.
- ▶ Real estate business transactions, either as a landlord or as an agent.
- ▶ Sending/receiving communication (email, phone, text) related to a personal business.
- ▶ Using company contact information (email, phone, address) as a means of contact for the personal business.





**OUR
IMAGE**

5.1 PUBLIC COMMUNICATIONS
5.2 SOCIAL MEDIA
5.3 INSIDER INFORMATION AND
TRADING ACTIVITIES
5.4 POLITICAL PARTICIPATION

5.5 POLITICAL CONTRIBUTIONS
5.6 GOVERNMENT RELATIONS
5.7 SUSTAINABILITY

5.1 PUBLIC COMMUNICATIONS

AEP is frequently the subject of print and electronic media coverage. AEP's Corporate Communications staff assists reporters from regional, national and international publications as they work on stories about issues and developments of importance to the company.

Contact [Corporate Communications](#) for assistance on media issues.



DID YOU KNOW

- ▶ If you receive a request from the news media to do an interview or respond to an issue on behalf of the company, please refer the request to Corporate Communications.
- ▶ In situations where an immediate comment is required in the interest of public safety, AEP employees should feel free to comment to the extent necessary on matters within their areas of expertise. In such cases, they should inform Corporate Communications of their media contact as soon as possible.



5.2 SOCIAL MEDIA

AEP anticipates that you may discuss your work experiences on social media. You are expected to comply with AEP's Social Media Policy at all times. Please be aware that derogatory comments or objectionable conduct toward fellow employees and management on social media may be considered harassment and intimidation just as if it happened in the workplace. It is also your responsibility to protect AEP's confidential or otherwise undisclosed documents at all times. For more information or questions, please review [AEP's Social Media Policy](#).

MANAGERS SHOULD BE CAUTIOUS ABOUT "FRIENDING" SUBORDINATES ON SOCIAL MEDIA



TELL ME MORE

- ▶ Remember that you are responsible for the content you publish on any medium.
- ▶ Refrain from using comments that are demeaning, inflammatory or offensive.
- ▶ Consider your audience before you post something.
- ▶ Make sure your profiles are consistent with how you present yourself to your co-workers and customers.

DID YOU KNOW

- ▶ Any page or other social media presence intended to officially represent the company (or any of its subsidiaries, projects or programs) must be approved by the Social Media Manager.
- ▶ Individuals who have been granted specific permission to comment on and/or otherwise contribute to social media on behalf of the company for business purposes are Authorized Digital Spokespersons.
- ▶ If you are not an Authorized Digital Spokesperson, you may not comment or make statements on behalf of AEP on social media.
- ▶ Never discuss, in social media, the employment status of a fellow employee or contractor, customer accounts, or contracts with AEP vendors.
- ▶ Respect copyrights and fair use.

5.3

INSIDER INFORMATION AND TRADING ACTIVITIES



AEP's stock is registered with the Securities and Exchange Commission, which allows the securities to be traded publicly. This right imposes an obligation on the company to support the integrity of the market.

Insider trading is the trading of company stock based on insider information and is strictly prohibited. Insider information includes material, non-public information that an employee, or an agent, vendor, contractor or consultant, learns through his or her employment.

An employee cannot buy or sell any company stock based upon material or non-public AEP information until after the public has received the information and the stock market has time to react to it.

Employees must not disclose insider information to others, including family, friends and acquaintances. Persons who trade AEP stock based on insider information may subject the employee who provided that information to criminal and/or civil action. This is the case whether or not the employee benefits from the transaction. All employees should refer to [AEP's Insider Trading Policy](#) for more information.



Employees who engage in commercial operations on behalf of AEP must periodically certify their compliance with relevant policies.



TELL ME MORE

EXAMPLES OF WHAT COULD BE CONSIDERED MATERIAL NON-PUBLIC INFORMATION INCLUDE:

- › Judicial or regulatory decisions.
- › Dividend declarations.
- › Plans to issue or buy back securities.
- › Earnings announcements.
- › Pending acquisitions or mergers.
- › Joint venture and contract negotiations.



Due to my job responsibilities, I often have access to earnings information before it is released. If someone asks me how the numbers look before the SEC filing, is it OK to provide them a general indication of the earnings?



No, any type of disclosure of material non-public information including estimates or other types of tipoffs is prohibited. Material non-public information should be discussed only among employees who have a need to know in order to complete their job responsibilities and who understand the insider trading rules.

INSIDER INFORMATION AND TRADING ACTIVITIES



My family and friends sometimes ask me how AEP is doing and if they should buy our stock. I feel the company is doing well, and I am proud to work for AEP, so I recommend that they buy it. Is this a problem?



It is great to be proud of our accomplishments. To avoid any potential problems, it would be best to refer them to the [Investors tab on AEP.com](#), where there are presentations and other investor-related materials for their review.

WHAT'S IN BOUNDS?

- › Protecting company inside information from those who do not have a need to know.
- › Adhering to SEC regulations and company policy for buying or selling AEP stock.

WHAT'S OUT OF BOUNDS?

- › Discussing inside information in public places.
- › Using or sharing inside information for personal gain.
- › Trading in the securities of AEP when you have material, non-public information that has not yet been released to the public.

5.4 POLITICAL PARTICIPATION

You are encouraged to participate in political and civic activities. However, you must ensure that you are fully able to meet the responsibilities of your job and that no conflict of interest exists between your employment and your duties in the public or civic arena. Employees seeking an elective office must be sensitive to potential conflicts of interest.



AEP recognizes that major corporate issues can be at stake in the political arena and maintains a public policy program to advocate AEP's positions on these issues. Such advocacy often involves communication with elected officials. However, AEP will exert no pressure, direct or indirect, to influence decisions of employees who serve in public positions.



AEP expects employee officeholders confronted with potential conflicts of interest to act in the public interest, guided by their consciences. Whether or not those decisions affect AEP, employee officeholders must avoid even the appearance of conflicts of interest. Such consideration by the employee may include the need to recuse oneself from such decisions. Employees expressing their personal views on political issues or candidates must indicate clearly that such views are their own and that they are not acting on behalf of AEP.



5.5 POLITICAL CONTRIBUTIONS

You must comply fully with federal, state and local laws that forbid the use of corporate funds or resources and ban gifts from lobbyists for support of political parties or candidates. Every employee has the right to participate in political matters and decide to whom or to which organization to contribute any personal political contribution. Company pressure of any kind, direct or implied, is not permitted.

5.6 GOVERNMENT RELATIONS

AEP is committed to nurturing strong and productive relationships with our public officials and regulators. You must conduct AEP business before public officials and regulators openly and honestly, exercising the utmost integrity at all times. When in doubt on any ethical question, always choose the highest standard.

5.7 SUSTAINABILITY



Our strategy for a sustainable future is to ensure the production and delivery of energy enables positive social and economic change for our customers, employees and communities. AEP's mission to collaboratively

redefine the future of energy is grounded by our culture of safety, continuous improvement and customer focus. We commit to support economic development, develop innovative solutions, champion education and make smart infrastructure investments that power our communities and improve lives. AEP will lead by example by setting strategic performance targets and goals, and we will be guided by these key principles:

► **Be a catalyst for change** – We will use our knowledge, voice, skills and relationships to enable innovation, bring new technologies to market, modernize the grid to be the ultimate optimizer of all resources and technologies, and develop a diverse, inclusive workforce for the 21st century. We will do this safely and efficiently and by working with our regulators.

- **Support environmental stewardship** – As we transition to a cleaner energy future, we seek to continuously improve operations across our business to reduce, mitigate or eliminate the resulting impacts on the environment.
- **Support strong local communities** – We have a responsibility to create shared value – for our customers, our employees and the communities we serve. Our investments will enable those living in our communities to develop the skills and resources they need to build a sustainable future for themselves.
- **Be a trusted energy partner** – We seek to be a trusted, credible partner that customers rely upon to help them navigate energy and technology choices, give them accurate, timely information they can act on, and be their provider of choice for safe, reliable electricity.



TELL ME MORE

Did you know that AEP publishes a web-based annual **Corporate Accountability Report** reporting on its environmental, social and economic performance?

- The report is widely used to educate and inform AEP investors, customers, employees and other stakeholders on AEP's performance, initiatives and strategy for the future.
- Employees can use the charts and graphs from the report in internal and external presentations. Find them in the [A to Z index](#) on AEPNow, under Sustainability at AEP.



REPORTING CONCERNS

- 6.1 SHOULD I REPORT?
- 6.2 HOW DO I REPORT?

- 6.3 HOW DOES THE CONCERNS LINE WORK?
- 6.4 RETALIATION

6.1 SHOULD I REPORT?

Deciding whether to report a concern can be a difficult decision for anyone. When faced with this dilemma, ask yourself a few questions about the activity or event. First, does your conscience tell you it's right? Next, is it ethical and legal? Then, does it fulfill AEP's Core Values? Finally, how would it read in the newspaper? If the answer to any of these questions confirms your concern that something could be unethical or illegal, you should report the concern. This is your company, and you have a responsibility to speak up when you see something that is, or appears to be, unethical or illegal.



DID YOU KNOW

- ▶ All calls and/or complaints are investigated.
- ▶ All complaints involving a director or above are escalated to senior management.
- ▶ All complaints are escalated at least 2 levels above the involved employee.
- ▶ The reporter can log into the [Concerns Line](#) at any time to communicate with E&C, provide additional information and/or check on the status of their concern.



TELL ME MORE

HOW DOES E&C ENSURE ANONYMITY?

- ▶ All calls to AEP's Concerns Line are answered by a third-party call center.
- ▶ The vendor does not track phone numbers or record the conversation.
- ▶ All calls and contacts are logged into a secure database that no one at AEP can access outside of E&C staff.
- ▶ Whether by phone or internet, the reporter creates a unique password to access his/her case in the future.
- ▶ It is the reporter's responsibility to log into the database to retrieve messages and requests from E&C.

6.2 HOW DO I REPORT?

If you become aware of any conduct or behavior in violation of the law or AEP's Principles of Business Conduct by anyone working for or on behalf of AEP, or if you have any business ethics questions or concerns, you are first encouraged to discuss your concern with your supervisor or others in management.

If you are unable or unwilling to discuss your concerns with your supervisor or others in management, or if your previous concerns have not been addressed to your satisfaction, you may call the AEP Concerns Line, toll free, 24 hours a day at 1-800-750-5001. You can also report online at www.aepconcernsline.com.

E&C will make every effort to maintain confidentiality of the information shared and the anonymity of anyone disclosing information.

AEP has a Whistleblower Protection Policy to reinforce federal protection of whistleblowers who report fraud, waste, abuse or mismanagement of American Recovery and Reinvestment Act funds. AEP will cooperate with any investigation as well as promote awareness of the policy to AEP employees, contractors, subcontractors, and suppliers.

HELPLINE
INFORMATION:

6.3 HOW DOES THE CONCERNS LINE WORK?

All calls to AEP's Concerns Line are answered by an independent, non-affiliated firm to ensure anonymity when desired by the caller. The firm's representative documents the concern and may ask clarifying questions to ensure that the concern is completely understood. The information is then transmitted to E&C, and an investigation is conducted to uncover the facts. E&C makes every effort to protect the reputation of everyone involved, and the focus of every investigation is what's right, not who's right. At the conclusion of every investigation, E&C provides a response to the caller directly or through the Concerns Line representative.

If you have questions or are seeking guidance on ethical issues and do not require anonymity, you can contact Ethics & Compliance directly through the Ethics Helpline at 614-716-6226 or Audinet 8-200-6226 .

AEP CONCERNS LINE TOLL-FREE



hours
a day

1.800.750.5001
www.aepconcernsline.com

6.4 RETALIATION

If you have questions or are seeking guidance on ethical issues and do not require anonymity, you can contact Ethics & Compliance directly.

The employees who come forward with concerns play an important role in maintaining a healthy, respectful and productive workplace.

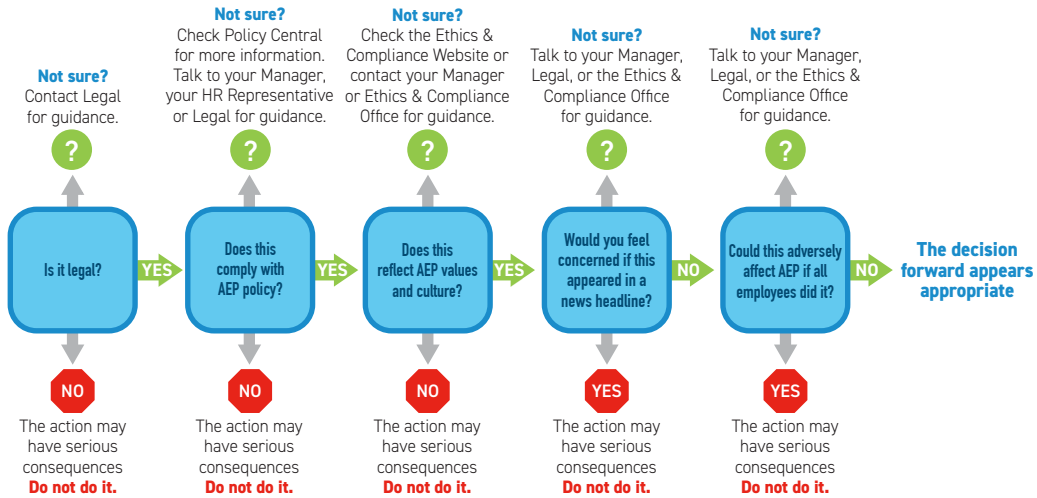
Retaliation against an employee who reports an issue in good faith or raises a concern he or she believes to be true involving a violation of company policy, law or regulation is strictly prohibited.

Retaliation can take many forms, such as demotions, undesirable assignments, inappropriate performance ratings and termination of employment. Retaliation may also include verbal harassment, intimidation, threats of retaliation and any attempt to identify an anonymous Concerns Line caller. Be aware that retaliation can occur between management and employees as well as among employees themselves.

RETALIATION



This Decision Chart can be a useful tool when you are faced with a difficult decision.



**Ethics & Compliance
 Contact Information**

 **E&C Hotline**
1.800.750.5001

 **E&C Hotline**
www.aepconcernsline.com

 **E&C Office**
614.716.6226

**Ethics & Compliance
 Chief Compliance Officer**
 American Electric Power
 1 Riverside Plaza, 20th floor
 Columbus, OH 43215

PLEASE USE THIS PAGE FOR FUTURE REFERENCE

CONTACTING THE OFFICE OF ETHICS & COMPLIANCE

As an AEP employee and/or contractor, you are responsible for reporting actual or suspected violations of the *Principles of Business Conduct* and for seeking clarification and guidance on ethics, compliance and legal issues. To report an actual or suspected violation or to seek guidance, you can contact:



Call the confidential hotline at
1.800.750.5001



File a concern online at
www.aepconcernsline.com



OFFICE OF THE CHIEF COMPLIANCE OFFICER:

Gina Mazzei-Smith

614.716.2990 • gemazzei-smith@aep.com

American Electric Power
1 Riverside Plaza, 20th Floor
Columbus, OH 43215



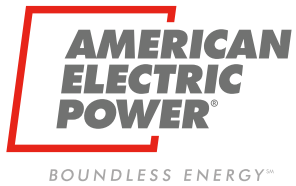
CONTACT THE ETHICS & COMPLIANCE STAFF DIRECTLY:

Stephanie Caudill
614.716.2935
stcaudill@aep.com

Heather Fagadar
614.716.3868
hifagadar@aep.com

Terry Waggener
614.716.1690
twaggener@aep.com

Donna Buckler
614.716.3550
dkbuckler@aep.com



Kentucky Power company
KPSC Case No. 2019-00002
Commission Staff's First Set of Data Requests
Dated February 11, 2019

DATA REQUEST

KPSC_12 For the last six months of the period under review and for the years 2019 and 2020, list all firm power commitments for Kentucky Power for (a) purchases and (b) sales. This list shall identify the electric utility, the amount of commitment in MW, and the purpose of the commitment (i .e., peaking, emergency).

RESPONSE

(a) Kentucky Power Company is committed to purchase 30% of AEG's 50% share of each Rockport unit, which aggregates to 393 MW for Kentucky Power.

(b) Firm Power sales: Commitments for Kentucky Power Company, other than retail jurisdictional customers, are the Cities of Olive Hill and Vanceburg Kentucky, as shown below. The numbers listed below represent the customer's peak load during the last 6 months of May 2018 through October 2018 and the years 2019 and 2020. The cities use the power for load-following service to their citizens.

	May - Oct. 2018	2019	2020
City of Olive Hill (MW)	4.8	5.6	5.7
City of Vanceburg (MW)	11.1	13.6	13.8

Witness: Ranie K. Wohnhas

Kentucky Power company
KPSC Case No. 2019-00002
Commission Staff's First Set of Data Requests
Dated February 11, 2019

DATA REQUEST

KPSC_13 Provide a monthly billing summary of sales to all electric utilities for the last six months of the period under review.

RESPONSE

Please see KPCO_R_KPSC_1_13_Attachment1.pdf for this response.

Witness: Ranie K. Wohnhas

Tracking Code	Description
AMCP2	Central Illinois Light Company dba AmerenCILCO, Central Illinois Public Service Co.
AMPO	American Muni Power - Ohio
AMRX2	Amerex Power, Ltd
APBE2	ICAP Energy LLC
BANG2	Village of Bangor, Wisconsin
BARR2	City of Barron, Wisconsin
BGCF2	BGC Financial LP
BGCS2	BGC Environmental Brokerage Services, L.P.
BIOU2	BioUrja Nehme Commodities, LLC
BLOO2	City of Bloomer, Wisconsin
BPEC	BP Energy Company
CADO2	Village of Cadott, Wisconsin
CECA2	Commonwealth Edison Co Auctio2
CEI	Citigroup Energy Inc.
CMS	CMS Energy Resource Management Company
CORN2	City of Cornell, Wisconsin
CPX	California Power Exchange
DEOI2	Duke Energy Ohio, Inc.
DLPM	Duquesne Light Company
DPC	Dairyland Power Cooperative
DPLG	The Dayton Power and Light Co.
DTET	DTE Energy Trading, Inc.
EDFT2	EDF Trading North America LLC
EVOF2	Evolution Markets Futures, LLC
EVOL2	Evolution Markets Inc.
EXGN	Exelon Generation
FESC	FirstEnergy Trading Services
FLET2	Flett Exchange, LLC
ICET2	ICE Trade Vault LLC
IVGE2	IVG Energy, LTD
JPMV2	JP Morgan Ventures Energy Corporation
KCP	Kansas City Power
MEDF2	City of Medford
MEEA2	Mercuria Energy America, Inc.
MISO	Midwest ISO
MPCO2	Monongahela Power Company
MRETS	Midwest Renewable Energy
MSCG	Morgan Stanley Capt.
MSUI2	Mizuho Securities USA Inc.
NAGP	Noble America's Gas & Power Corp.
NASIA	Systems Integration Agreement
NEXT2	NextEra Energy Power Marketing, LLC

OHPA2	Ohio Power Company (Auction)
PICT	The Pictsweet Company
PJM	PJM Interconnection
PJME2	PJM Environmental Info Sys Inc
PPLT2	PPL Electric Utilities Corporation
PREE2	Tullett Prebon Americas Corp.
RBCC2	RBC Capital Market, LLC
RICE2	City of Rice Lake Utilities
SPOO2	City of Spooner, Wisconsin
SPSR2	Marex Spectron
SUCO2	SunCoke Energy, Inc.
TFSF2	TFS Energy Futures, LLC
TOHI2	Town of Hagerstown Indiana
TRED2	Trident Brokerage Services LLC
TREM2	Village of Trempealeau, Wisconsin
TVAM	TVA Bulk Power Trading
VITOL	Vitol Inc.
WAKE2	City of Wakefield, Michigan
WSTR2	City of Westerville
WVPA	Wabash Valley Power Assn, Inc.

Pd	Year	Unit	Ref	Trkg Cd	Account	Revenue	KWH Metered
5	2018	117		OHPA2	4470001	88,843.90	1,760,080.08
					4470001 Total	88,843.90	
5	2018	117		PJM	4470006	(11,705.16)	(547,427.00)
5	2018	117	NEQT	DEOI2	4470006	135,592.48	2,770,000.00
5	2018	117	PEQT	AMRX2	4470006	0.00	0.00
5	2018	117	PEQT	PREE2	4470006	0.00	0.00
5	2018	117	PHRT	EVOF2	4470006	(5.41)	0.00
5	2018	117	PHRT	IVGE2	4470006	(32.95)	0.00
5	2018	117	PHRT	PREE2	4470006	0.00	0.00
5	2018	117	PICT	AMRX2	4470006	(167.78)	0.00
5	2018	117	PICT	APBE2	4470006	(355.46)	0.00
5	2018	117	PICT	BGCF2	4470006	(302.57)	0.00
5	2018	117	PICT	CECA2	4470006	27,771.85	863,016.00
5	2018	117	PICT	DEOI2	4470006	57,738.64	1,231,000.00
5	2018	117	PICT	DPLG	4470006	55,401.36	1,078,000.00
5	2018	117	PICT	EVOF2	4470006	(146.05)	0.00
5	2018	117	PICT	IVGE2	4470006	(106.03)	0.00
5	2018	117	PICT	PREE2	4470006	(989.09)	0.00
5	2018	117	PICT	SPSR2	4470006	(9.61)	0.00
5	2018	117	PICT	TFSF2	4470006	(91.05)	0.00
5	2018	117	PICT	TRED2	4470006	(225.36)	0.00
5	2018	117	PSHD	AMRX2	4470006	0.00	0.00
5	2018	117	PSHD	DLPM	4470006	13,774.22	0.00
5	2018	117	PSHD	EVOF2	4470006	(17.26)	0.00
5	2018	117	PSHD	IVGE2	4470006	(6.75)	0.00
5	2018	117	PSHD	PREE2	4470006	0.00	0.00
5	2018	117	PSHD	SPSR2	4470006	0.00	0.00
5	2018	117	PSHD	TFSF2	4470006	0.00	0.00
					4470006 Total	276,118.02	
5	2018	117		ICET2	4470010	(618.13)	0.00
5	2018	117		PJM	4470010	0.75	0.00
5	2018	117		PJM	4470010	(63,381.36)	(1,528,347.00)
5	2018	117		PJM	4470010	(223,884.68)	(5,476,679.00)
5	2018	117		PJM	4470010	(22.69)	0.00
5	2018	117	PEQT	AMRX2	4470010	0.00	0.00
5	2018	117	PHRD	TVAM	4470010	(9,846.23)	(304,017.00)
5	2018	117	PHRT	APBE2	4470010	0.00	0.00
5	2018	117	PHRT	EVOF2	4470010	(5.41)	0.00
5	2018	117	PHRT	ICET2	4470010	(73.26)	0.00
5	2018	117	PHRT	IVGE2	4470010	(32.95)	0.00
5	2018	117	PHRT	SPSR2	4470010	(3.92)	0.00
5	2018	117	PICT	AMCP2	4470010	0.00	0.00

5	2018 117	PICT	AMRX2	4470010	(345.58)	0.00
5	2018 117	PICT	APBE2	4470010	(423.13)	0.00
5	2018 117	PICT	BGCF2	4470010	(205.42)	0.00
5	2018 117	PICT	EVOF2	4470010	(111.51)	0.00
5	2018 117	PICT	ICET2	4470010	(18.39)	0.00
5	2018 117	PICT	IVGE2	4470010	(37.97)	0.00
5	2018 117	PICT	PREE2	4470010	(247.16)	0.00
5	2018 117	PICT	TFSF2	4470010	(20.01)	0.00
5	2018 117	PICT	TRED2	4470010	(72.57)	0.00
5	2018 117	PSHD	AMRX2	4470010	0.00	0.00
5	2018 117	PSHD	EVOF2	4470010	(29.03)	0.00
5	2018 117	PSHD	IVGE2	4470010	(23.22)	0.00
5	2018 117	PSHD	PREE2	4470010	0.00	0.00
5	2018 117	PSHD	SPSR2	4470010	0.00	0.00
5	2018 117	PSHD	TFSF2	4470010	(34.52)	0.00
				4470010 Total	(299,436.39)	
5	2018 117	KBRA	RBCC2	4470081	(58.43)	0.00
5	2018 117	KSHD	RBCC2	4470081	(12,687.23)	0.00
				4470081 Total	(12,745.66)	
5	2018 117	PHRT	MSUI2	4470082	(6,300.35)	0.00
5	2018 117	PHRT	RBCC2	4470082	13,949.70	0.00
5	2018 117	PICT	MSUI2	4470082	(42,861.46)	0.00
5	2018 117	PICT	RBCC2	4470082	54,616.84	0.00
5	2018 117	PICT	WVPA	4470082	(6,883.91)	0.00
5	2018 117	PSHD	MSUI2	4470082	34,270.95	0.00
5	2018 117	PSHD	RBCC2	4470082	(88,083.14)	0.00
				4470082 Total	(41,291.37)	
5	2018 117		PJM	4470089	733,780.65	0.00
				4470089 Total	733,780.65	
5	2018 117		PJM	4470098	(0.01)	0.00
5	2018 117		PJM	4470098	(15,646.50)	0.00
				4470098 Total	(15,646.51)	
5	2018 117		PJM	4470099	81,717.24	0.00
5	2018 117		PJM	4470099	62,647.06	0.00
				4470099 Total	144,364.30	
5	2018 117		PJM	4470100	113,562.25	0.00
				4470100 Total	113,562.25	
5	2018 117		PJM	4470103	2,373,921.09	83,600,946.00
				4470103 Total	2,373,921.09	
5	2018 117		PJM	4470107	(5.26)	0.00
				4470107 Total	(5.26)	
5	2018 117		PJM	4470110	(8.38)	0.00
				4470110 Total	(8.38)	

5	2018 117	PHHS	DLPM	4470112	241,270.67	4,873,000.00
5	2018 117	PHHS	DPLG	4470112	28,901.73	562,000.00
				4470112 Total	270,172.40	
5	2018 117		PJM	4470115	(853.41)	0.00
				4470115 Total	(853.41)	
5	2018 117		PJM	4470126	40,783.36	0.00
				4470126 Total	40,783.36	
5	2018 117		PJM	4470131	0.14	0.00
5	2018 117		PJM	4470131	(254,475.93)	(4,291,286.00)
5	2018 117		PJM	4470131	(53,005.32)	(953,531.00)
5	2018 117		PJM	4470131	(32,967.03)	(602,067.00)
5	2018 117		PJM	4470131	(98,408.89)	(1,819,029.00)
				4470131 Total	(438,857.03)	
5	2018 117	PHHS	AMRX2	4470143	(38.15)	0.00
5	2018 117	PHHS	APBE2	4470143	(106.42)	0.00
5	2018 117	PHHS	EVOF2	4470143	(36.24)	0.00
5	2018 117	PHHS	ICET2	4470143	(3.32)	0.00
5	2018 117	PHHS	IVGE2	4470143	(193.31)	0.00
5	2018 117	PHHS	MSUI2	4470143	70,021.86	0.00
5	2018 117	PHHS	PREE2	4470143	(180.67)	0.00
5	2018 117	PHHS	RBCC2	4470143	(83,164.68)	0.00
5	2018 117	PHHS	TFSF2	4470143	(4.29)	0.00
5	2018 117	PHHS	TRED2	4470143	(17.16)	0.00
				4470143 Total	(13,722.38)	
5	2018 117	Physical	NASIA	4470175	161,002.24	0.00
5	2018 117	Trading	NASIA	4470175	(15,153.47)	0.00
				4470175 Total	145,848.77	
5	2018 117	Physical	NASIA	4470176	(161,002.24)	0.00
5	2018 117	Trading	NASIA	4470176	15,153.47	0.00
				4470176 Total	(145,848.77)	
5	2018 117		PJM	4470206	9,065.60	0.00
				4470206 Total	9,065.60	
5	2018 117		PJM	4470209	(40,852.39)	0.00
				4470209 Total	(40,852.39)	
5	2018 117		PJM	4470214	20,675.54	0.00
				4470214 Total	20,675.54	
5	2018 117		PJM	4470215	(12,868.51)	0.00
				4470215 Total	(12,868.51)	
5	2018 117		PJM	4470220	40,077.27	0.00
				4470220 Total	40,077.27	
5	2018 117		PJM	4470221	716.36	0.00
				4470221 Total	716.36	
5	2018 117		PJM	5550039	(142.21)	0.00

			5550039 Total	(142.21)	
5	2018 110	FLET2	5570007	(637.45)	(50.00)
5	2018 110	PJME2	5570007	(19.25)	(4,812.00)
5	2018 110	TFSF2	5570007	(80.81)	(785.00)
			5570007 Total	(737.51)	
5	2018 117	PJM	5614000	0.00	0.00
5	2018 117	PJM	5614000	(13,165.11)	0.00
			5614000 Total	(13,165.11)	
5	2018 180	PJM	5614008	0.00	0.00
			5614008 Total	0.00	
5	2018 117	PJM	5618000	0.00	0.00
5	2018 117	PJM	5618000	(0.01)	0.00
5	2018 117	PJM	5618000	(3,054.40)	0.00
5	2018 117	PJM	5618000	(11.13)	0.00
			5618000 Total	(3,065.54)	
5	2018 117	PJM	5757000	0.00	0.00
5	2018 117	PJM	5757000	(3.53)	0.00
5	2018 117	PJM	5757000	(11,488.12)	0.00
5	2018 117	PJM	5757000	(267.15)	0.00
			5757000 Total	(11,758.80)	
			May Grand Total	3,206,924.28	

Pd	Year	Unit	Ref	Trkg Cd	Account	Revenue	KWH Metered
6	2018	117		OHPA2	4470001	(1,496.34)	(29,664.34)
					4470001 Total	(1,496.34)	
6	2018	117		PJM	4470006	(39,430.76)	(1,606,307.00)
6	2018	117	NEQT	DEOI2	4470006	117,210.11	2,193,000.00
6	2018	117	PHRT	AMRX2	4470006	(3.96)	0.00
6	2018	117	PHRT	EVOF2	4470006	0.00	0.00
6	2018	117	PHRT	IVGE2	4470006	(6.04)	0.00
6	2018	117	PICT	AMRX2	4470006	(47.49)	0.00
6	2018	117	PICT	APBE2	4470006	(27.61)	0.00
6	2018	117	PICT	BGCF2	4470006	0.00	0.00
6	2018	117	PICT	CECA2	4470006	44,810.23	1,697,400.00
6	2018	117	PICT	DEOI2	4470006	(4,732.45)	(101,000.00)
6	2018	117	PICT	DPLG	4470006	14,561.46	299,000.00
6	2018	117	PICT	EVOF2	4470006	(64.22)	0.00
6	2018	117	PICT	FESC	4470006	312,055.93	5,735,000.00
6	2018	117	PICT	IVGE2	4470006	(345.37)	0.00
6	2018	117	PICT	PPLT2	4470006	58,205.04	1,198,000.00
6	2018	117	PICT	PREE2	4470006	(202.71)	0.00
6	2018	117	PICT	SPSR2	4470006	0.00	0.00
6	2018	117	PICT	TFSF2	4470006	(41.02)	0.00
6	2018	117	PICT	TRED2	4470006	(16.60)	0.00
6	2018	117	PSHD	AMRX2	4470006	(27.91)	0.00
6	2018	117	PSHD	DLPM	4470006	12,992.67	0.00
6	2018	117	PSHD	EVOF2	4470006	(3.96)	0.00
6	2018	117	PSHD	IVGE2	4470006	(40.81)	0.00
6	2018	117	PSHD	PREE2	4470006	(5.73)	0.00
					4470006 Total	514,838.80	
6	2018	117		ICET2	4470010	(695.16)	0.00
6	2018	117		PJM	4470010	(0.01)	0.00
6	2018	117		PJM	4470010	(15,942.34)	(289,547.00)
6	2018	117		PJM	4470010	(123,488.48)	(2,077,101.00)
6	2018	117		PJM	4470010	(51,203.81)	(1,198,128.00)
6	2018	117		PJM	4470010	(292,166.77)	(5,734,978.00)
6	2018	117		PJM	4470010	(20.98)	0.00
6	2018	117		PJM	4470010	(10.33)	0.00
6	2018	117		PJM	4470010	(135,545.85)	(2,651,307.00)
6	2018	117		PJM	4470010	(10.46)	0.00
6	2018	117	PHRD	TVAM	4470010	(3,237.32)	(99,581.00)
6	2018	117	PHRT	AMRX2	4470010	(3.96)	0.00
6	2018	117	PHRT	EVOF2	4470010	0.00	0.00
6	2018	117	PHRT	ICET2	4470010	(55.61)	0.00
6	2018	117	PHRT	IVGE2	4470010	(6.04)	0.00

6	2018 117	PHRT	SPSR2	4470010	0.00	0.00
6	2018 117	PICT	AMRX2	4470010	(72.20)	0.00
6	2018 117	PICT	APBE2	4470010	(40.74)	0.00
6	2018 117	PICT	BGCF2	4470010	0.00	0.00
6	2018 117	PICT	EVOF2	4470010	(18.48)	0.00
6	2018 117	PICT	ICET2	4470010	(18.39)	0.00
6	2018 117	PICT	IVGE2	4470010	(106.37)	0.00
6	2018 117	PICT	PREE2	4470010	(52.43)	0.00
6	2018 117	PICT	TFSF2	4470010	(18.48)	0.00
6	2018 117	PICT	TRED2	4470010	(1.78)	0.00
6	2018 117	PSHD	AMRX2	4470010	(27.91)	0.00
6	2018 117	PSHD	EVOF2	4470010	(3.96)	0.00
6	2018 117	PSHD	IVGE2	4470010	(40.81)	0.00
6	2018 117	PSHD	PREE2	4470010	(3.77)	0.00
6	2018 117	PSHD	SPSR2	4470010	(3.77)	0.00
6	2018 117	PSHD	TFSF2	4470010	0.00	0.00
				4470010 Total	(622,796.21)	
6	2018 117	KBRA	RBCC2	4470081	(165.34)	0.00
6	2018 117	KSHD	RBCC2	4470081	(10,487.45)	0.00
				4470081 Total	(10,652.79)	
6	2018 117	PEQT	MSUI2	4470082	11,012.40	0.00
6	2018 117	PEQT	RBCC2	4470082	(2.95)	0.00
6	2018 117	PHRT	MSUI2	4470082	(1,126.31)	0.00
6	2018 117	PHRT	RBCC2	4470082	251.92	0.00
6	2018 117	PICT	MSUI2	4470082	(3,675.91)	0.00
6	2018 117	PICT	RBCC2	4470082	(16,492.94)	0.00
6	2018 117	PICT	WVPA	4470082	(597.85)	0.00
6	2018 117	PJST	RBCC2	4470082	(3,184.14)	0.00
6	2018 117	PSHD	MSUI2	4470082	3,741.04	0.00
6	2018 117	PSHD	RBCC2	4470082	(22,194.54)	0.00
				4470082 Total	(32,269.28)	
6	2018 117		PJM	4470089	316,952.09	0.00
				4470089 Total	316,952.09	
6	2018 117		PJM	4470098	2,063.39	0.00
6	2018 117		PJM	4470098	(12,775.26)	0.00
6	2018 117		PJM	4470098	(0.04)	0.00
				4470098 Total	(10,711.91)	
6	2018 117		PJM	4470099	74,943.00	0.00
6	2018 117		PJM	4470099	0.00	0.00
				4470099 Total	74,943.00	
6	2018 117		PJM	4470100	12,428.19	0.00
				4470100 Total	12,428.19	
6	2018 117		PJM	4470103	1,704,273.43	59,305,051.00

				4470103 Total	1,704,273.43	
6	2018 117		PJM	4470107	(0.84)	0.00
				4470107 Total	(0.84)	
6	2018 117		PJM	4470110	0.03	0.00
				4470110 Total	0.03	
6	2018 117	PHHS	DLPM	4470112	49,802.46	1,058,000.00
6	2018 117	PHHS	DPLG	4470112	214.95	3,000.00
				4470112 Total	50,017.41	
6	2018 117		PJM	4470115	(410.07)	0.00
6	2018 117		PJM	4470115	(393.08)	0.00
				4470115 Total	(803.15)	
6	2018 117		PJM	4470126	4,361.55	0.00
6	2018 117		PJM	4470126	(17,928.05)	0.00
6	2018 117		PJM	4470126	(31.77)	0.00
				4470126 Total	(13,598.27)	
6	2018 117		PJM	4470131	(2.43)	0.00
6	2018 117		PJM	4470131	(43,831.13)	(828,638.00)
6	2018 117		PJM	4470131	(6,805.71)	(137,879.00)
6	2018 117		PJM	4470131	42.04	737.00
6	2018 117		PJM	4470131	5,625.30	29,664.00
				4470131 Total	(44,971.93)	
6	2018 117	PHHS	AMRX2	4470143	(10.01)	0.00
6	2018 117	PHHS	APBE2	4470143	(22.85)	0.00
6	2018 117	PHHS	EVOF2	4470143	(25.03)	0.00
6	2018 117	PHHS	ICET2	4470143	(19.15)	0.00
6	2018 117	PHHS	IVGE2	4470143	(130.24)	0.00
6	2018 117	PHHS	MSUI2	4470143	(911.89)	0.00
6	2018 117	PHHS	PREE2	4470143	0.00	0.00
6	2018 117	PHHS	RBCC2	4470143	(16,801.79)	0.00
6	2018 117	PHHS	TF SF2	4470143	0.00	0.00
6	2018 117	PHHS	TRED2	4470143	0.00	0.00
				4470143 Total	(17,920.96)	
6	2018 117		OHPA2	4470151	131,323.09	2,651,384.90
				4470151 Total	131,323.09	
6	2018 117	Physical	NASIA	4470175	(378,739.03)	0.00
6	2018 117	Trading	NASIA	4470175	14,428.97	0.00
				4470175 Total	(364,310.06)	
6	2018 117	Physical	NASIA	4470176	378,739.03	0.00
6	2018 117	Trading	NASIA	4470176	(14,428.97)	0.00
				4470176 Total	364,310.06	
6	2018 117		PJM	4470206	12,345.33	0.00
6	2018 117		PJM	4470206	4.61	0.00
				4470206 Total	12,349.94	

6	2018 117	PJM	4470209	(28,192.02)	0.00
6	2018 117	PJM	4470209	(26,168.85)	0.00
6	2018 117	PJM	4470209	1.25	0.00
			4470209 Total	(54,359.62)	
6	2018 117	PJM	4470214	3,207.54	0.00
			4470214 Total	3,207.54	
6	2018 117	PJM	4470215	(1,798.14)	0.00
6	2018 117	PJM	4470215	(5.94)	0.00
			4470215 Total	(1,804.08)	
6	2018 117	PJM	4470220	9,229.82	0.00
6	2018 117	PJM	4470220	(1.01)	0.00
			4470220 Total	9,228.81	
6	2018 117	PJM	4470221	4,184.70	0.00
6	2018 117	PJM	4470221	(0.84)	0.00
			4470221 Total	4,183.86	
6	2018 117	PJM	5550039	163.90	0.00
6	2018 117	PJM	5550039	(0.06)	0.00
			5550039 Total	163.84	
6	2018 110	PJME2	5570007	(15.36)	(3,840.00)
			5570007 Total	(15.36)	
6	2018 117	PJM	5614000	0.00	0.00
6	2018 117	PJM	5614000	(11.43)	0.00
6	2018 117	PJM	5614000	(8,754.54)	0.00
6	2018 117	PJM	5614000	(3.44)	0.00
			5614000 Total	(8,769.41)	
6	2018 180	PJM	5614008	0.00	0.00
			5614008 Total	0.00	
6	2018 117	PJM	5618000	0.00	0.00
6	2018 117	PJM	5618000	(5.87)	0.00
6	2018 117	PJM	5618000	(2,028.60)	0.00
6	2018 117	PJM	5618000	(0.46)	0.00
6	2018 117	PJM	5618000	(16.94)	0.00
			5618000 Total	(2,051.87)	
6	2018 117	PJM	5757000	0.00	0.00
6	2018 117	PJM	5757000	(265.82)	0.00
6	2018 117	PJM	5757000	(7,281.62)	0.00
6	2018 117	PJM	5757000	(1.09)	0.00
6	2018 117	PJM	5757000	(406.46)	0.00
			5757000 Total	(7,954.99)	
			June Grand Total	2,003,733.02	

Pd	Year	Unit	Ref	Trkg Cd	Account	Revenue	KWH Metered
7	2018	117		OHPA2	4470001	(2,917.22)	(57,740.38)
					4470001 Total	(2,917.22)	
7	2018	117		NASIA	4470006	0.00	0.00
7	2018	117		PJM	4470006	(344,374.81)	(9,844,920.00)
7	2018	117	NEQT	DEOI2	4470006	128,328.90	2,409,000.00
7	2018	117	PHRT	AMRX2	4470006	0.00	0.00
7	2018	117	PHRT	IVGE2	4470006	0.00	0.00
7	2018	117	PICT	AMRX2	4470006	(900.75)	0.00
7	2018	117	PICT	APBE2	4470006	(188.87)	0.00
7	2018	117	PICT	BGCF2	4470006	(48.96)	0.00
7	2018	117	PICT	CECA2	4470006	340,354.73	9,844,920.00
7	2018	117	PICT	DEOI2	4470006	(2,931.46)	(63,000.00)
7	2018	117	PICT	DPLG	4470006	15,851.78	376,000.00
7	2018	117	PICT	EVOF2	4470006	(131.83)	0.00
7	2018	117	PICT	FESC	4470006	348,456.11	6,404,000.00
7	2018	117	PICT	IVGE2	4470006	(584.49)	0.00
7	2018	117	PICT	PPLT2	4470006	68,141.09	1,403,000.00
7	2018	117	PICT	PREE2	4470006	(230.69)	0.00
7	2018	117	PICT	SPSR2	4470006	(16.22)	0.00
7	2018	117	PICT	TFSF2	4470006	(96.05)	0.00
7	2018	117	PICT	TRED2	4470006	(7.17)	0.00
7	2018	117	PSHD	AMRX2	4470006	(8.68)	0.00
7	2018	117	PSHD	APBE2	4470006	(12.45)	0.00
7	2018	117	PSHD	DLPM	4470006	8,873.20	0.00
7	2018	117	PSHD	EVOF2	4470006	(119.01)	0.00
7	2018	117	PSHD	IVGE2	4470006	(34.70)	0.00
7	2018	117	PSHD	PREE2	4470006	(34.70)	0.00
7	2018	117	PSHD	TFSF2	4470006	(8.68)	0.00
					4470006 Total	560,276.29	
7	2018	117		ICET2	4470010	(738.02)	0.00
7	2018	117		PJM	4470010	(17,742.86)	(324,938.00)
7	2018	117		PJM	4470010	(134,556.89)	(2,342,634.00)
7	2018	117		PJM	4470010	(68,312.76)	(1,400,134.00)
7	2018	117		PJM	4470010	(328,465.76)	(6,380,485.00)
7	2018	117		PJM	4470010	(19.14)	0.00
7	2018	117		PJM	4470010	(10.00)	0.00
7	2018	117		PJM	4470010	(151,235.53)	(2,958,554.00)
7	2018	117		PJM	4470010	(1.45)	0.00
7	2018	117	PHRD	TVAM	4470010	0.00	0.00
7	2018	117	PHRT	AMRX2	4470010	0.00	0.00
7	2018	117	PHRT	ICET2	4470010	(22.35)	0.00
7	2018	117	PHRT	IVGE2	4470010	0.00	0.00

7	2018	117	PICT	AMRX2	4470010	(925.09)	0.00
7	2018	117	PICT	APBE2	4470010	(100.81)	0.00
7	2018	117	PICT	BGCF2	4470010	(0.87)	0.00
7	2018	117	PICT	EVOF2	4470010	(130.13)	0.00
7	2018	117	PICT	ICET2	4470010	(17.68)	0.00
7	2018	117	PICT	IVGE2	4470010	(621.69)	0.00
7	2018	117	PICT	PREE2	4470010	(355.32)	0.00
7	2018	117	PICT	TFSF2	4470010	(34.71)	0.00
7	2018	117	PICT	TRED2	4470010	(44.70)	0.00
7	2018	117	PSHD	AMRX2	4470010	(17.35)	0.00
7	2018	117	PSHD	APBE2	4470010	(12.45)	0.00
7	2018	117	PSHD	EVOF2	4470010	(134.85)	0.00
7	2018	117	PSHD	IVGE2	4470010	(34.70)	0.00
7	2018	117	PSHD	PREE2	4470010	(31.68)	0.00
7	2018	117	PSHD	SPSR2	4470010	(16.22)	0.00
					4470010 Total	(703,583.01)	
7	2018	117	KSHD	RBCC2	4470081	1,246.49	0.00
					4470081 Total	1,246.49	
7	2018	117	PEQT	MSUI2	4470082	7,483.93	0.00
7	2018	117	PEQT	RBCC2	4470082	(2,148.91)	0.00
7	2018	117	PHRT	RBCC2	4470082	4,961.01	0.00
7	2018	117	PICT	MSUI2	4470082	10,030.83	0.00
7	2018	117	PICT	RBCC2	4470082	50,670.03	0.00
7	2018	117	PICT	WVPA	4470082	(2,828.18)	0.00
7	2018	117	PJST	RBCC2	4470082	(1,341.93)	0.00
7	2018	117	PSHD	MSUI2	4470082	665.26	0.00
7	2018	117	PSHD	RBCC2	4470082	(6,949.14)	0.00
					4470082 Total	60,542.90	
7	2018	117		NASIA	4470089	0.00	0.00
7	2018	117		PJM	4470089	2,078,793.51	0.00
					4470089 Total	2,078,793.51	
7	2018	117		NASIA	4470098	0.00	0.00
7	2018	117		PJM	4470098	(1,979.81)	0.00
7	2018	117		PJM	4470098	(11,945.01)	0.00
					4470098 Total	(13,924.82)	
7	2018	117		NASIA	4470099	0.00	0.00
7	2018	117		PJM	4470099	42,763.82	0.00
					4470099 Total	42,763.82	
7	2018	117		NASIA	4470100	0.00	0.00
7	2018	117		PJM	4470100	175,605.24	0.00
					4470100 Total	175,605.24	
7	2018	117		NASIA	4470103	0.00	0.00
7	2018	117		PJM	4470103	4,148,397.36	165,837,627.00

				4470103 Total	4,148,397.36	
7	2018 117		PJM	4470107	(0.82)	0.00
				4470107 Total	(0.82)	
7	2018 117		PJM	4470110	(0.02)	0.00
				4470110 Total	(0.02)	
7	2018 117		NASIA	4470112	0.00	0.00
7	2018 117	PHHS	DLPM	4470112	345,505.43	6,953,000.00
7	2018 117	PHHS	DPLG	4470112	244.24	5,000.00
				4470112 Total	345,749.67	
7	2018 117		NASIA	4470115	0.00	0.00
7	2018 117		PJM	4470115	(4,347.51)	0.00
				4470115 Total	(4,347.51)	
7	2018 117		PJM	4470126	3,987.04	0.00
7	2018 117		PJM	4470126	(151,667.29)	0.00
				4470126 Total	(147,680.25)	
7	2018 117		PJM	4470131	(318,236.73)	(6,019,911.00)
7	2018 117		PJM	4470131	(44,844.88)	(883,946.00)
7	2018 117		PJM	4470131	(52.04)	(1.00)
7	2018 117		PJM	4470131	371.01	(50.00)
				4470131 Total	(362,762.64)	
7	2018 117	PHHS	AMRX2	4470143	(94.79)	0.00
7	2018 117	PHHS	APBE2	4470143	(69.94)	0.00
7	2018 117	PHHS	EVOF2	4470143	0.05	0.00
7	2018 117	PHHS	ICET2	4470143	(5.51)	0.00
7	2018 117	PHHS	IVGE2	4470143	(322.20)	0.00
7	2018 117	PHHS	MSUI2	4470143	1,849.31	0.00
7	2018 117	PHHS	PREE2	4470143	(260.76)	0.00
7	2018 117	PHHS	RBCC2	4470143	(117,275.57)	0.00
				4470143 Total	(116,179.41)	
7	2018 117		OHPA2	4470151	146,541.16	2,958,634.37
				4470151 Total	146,541.16	
7	2018 117	Physical	NASIA	4470175	900,510.89	0.00
7	2018 117	Trading	NASIA	4470175	32,916.28	0.00
				4470175 Total	933,427.17	
7	2018 117	Physical	NASIA	4470176	(900,510.89)	0.00
7	2018 117	Trading	NASIA	4470176	(32,916.28)	0.00
				4470176 Total	(933,427.17)	
7	2018 117		PJM	4470206	49,728.74	0.00
				4470206 Total	49,728.74	
7	2018 117		PJM	4470209	(6,024.38)	0.00
7	2018 117		PJM	4470209	(233,276.14)	0.00
				4470209 Total	(239,300.52)	
7	2018 117		NASIA	4470214	0.00	0.00

7	2018 117	PJM	4470214	80,545.32	0.00
			4470214 Total	80,545.32	
7	2018 117	NASIA	4470215	0.00	0.00
7	2018 117	PJM	4470215	(42,831.79)	0.00
			4470215 Total	(42,831.79)	
7	2018 117	NASIA	4470220	0.00	0.00
7	2018 117	PJM	4470220	82,538.68	0.00
			4470220 Total	82,538.68	
7	2018 117	NASIA	4470221	0.00	0.00
7	2018 117	PJM	4470221	2,896.15	0.00
			4470221 Total	2,896.15	
7	2018 117	PJM	5550039	(890.35)	0.00
			5550039 Total	(890.35)	
7	2018 110	DTET	5570007	(4,950.75)	(1,320.00)
7	2018 110	PJME2	5570007	(18.27)	(4,568.00)
			5570007 Total	(4,969.02)	
7	2018 117	PJM	5614000	0.00	0.00
7	2018 117	PJM	5614000	(3.14)	0.00
7	2018 117	PJM	5614000	(24,528.97)	0.00
			5614000 Total	(24,532.11)	
7	2018 180	PJM	5614008	0.00	0.00
			5614008 Total	0.00	
7	2018 117	PJM	5618000	0.00	0.00
7	2018 117	PJM	5618000	(2.23)	0.00
7	2018 117	PJM	5618000	(5,833.67)	0.00
7	2018 117	PJM	5618000	(17.06)	0.00
			5618000 Total	(5,852.96)	
7	2018 117	PJM	5757000	0.00	0.00
7	2018 117	PJM	5757000	(104.18)	0.00
7	2018 117	PJM	5757000	(22,888.61)	0.00
7	2018 117	PJM	5757000	(409.46)	0.00
			5757000 Total	(23,402.25)	
			July Grand Total	6,082,450.63	

Pd	Year	Unit	Ref	Trkg Cd	Account	Revenue	KWH Metered
8	2018	117		OHPA2	4470001	(34.93)	0.00
					4470001 Total	(34.93)	
8	2018	117		PJM	4470006	(357,728.48)	(10,035,783.00)
8	2018	117	NEQT	DEOI2	4470006	118,153.40	2,228,000.00
8	2018	117	PHRT	APBE2	4470006	(2.26)	0.00
8	2018	117	PICT	AMRX2	4470006	(182.00)	0.00
8	2018	117	PICT	APBE2	4470006	(86.28)	0.00
8	2018	117	PICT	BGCF2	4470006	(28.86)	0.00
8	2018	117	PICT	CECA2	4470006	364,938.36	10,448,440.00
8	2018	117	PICT	DEOI2	4470006	(0.01)	0.00
8	2018	117	PICT	DPLG	4470006	15,435.49	267,000.00
8	2018	117	PICT	EVOF2	4470006	(73.62)	0.00
8	2018	117	PICT	FESC	4470006	334,420.25	6,145,000.00
8	2018	117	PICT	IVGE2	4470006	(130.13)	0.00
8	2018	117	PICT	PPLT2	4470006	71,533.76	1,472,000.00
8	2018	117	PICT	PREE2	4470006	(313.10)	0.00
8	2018	117	PICT	SPSR2	4470006	0.00	0.00
8	2018	117	PICT	TFSF2	4470006	(33.57)	0.00
8	2018	117	PICT	TRED2	4470006	(7.54)	0.00
8	2018	117	PSHD	AMRX2	4470006	(14.33)	0.00
8	2018	117	PSHD	APBE2	4470006	0.00	0.00
8	2018	117	PSHD	DLPM	4470006	11,674.85	0.00
8	2018	117	PSHD	EVOF2	4470006	(27.91)	0.00
8	2018	117	PSHD	IVGE2	4470006	0.00	0.00
8	2018	117	PSHD	PREE2	4470006	(28.67)	0.00
8	2018	117	PSHD	TFSF2	4470006	(20.41)	0.00
					4470006 Total	557,478.94	
8	2018	117		ICET2	4470010	(727.79)	0.00
8	2018	117		PJM	4470010	226.28	0.00
8	2018	117		PJM	4470010	124.83	0.00
8	2018	117		PJM	4470010	356.35	0.00
8	2018	117		PJM	4470010	1,229.70	0.00
8	2018	117		PJM	4470010	778.52	0.00
8	2018	117		PJM	4470010	(16,484.83)	(320,095.00)
8	2018	117		PJM	4470010	88.36	0.00
8	2018	117		PJM	4470010	(107,342.25)	(2,068,798.00)
8	2018	117		PJM	4470010	(67,469.23)	(1,478,836.00)
8	2018	117		PJM	4470010	(309,624.28)	(6,189,207.00)
8	2018	117		PJM	4470010	(19.12)	0.00
8	2018	117		PJM	4470010	(9.83)	0.00
8	2018	117		PJM	4470010	70.48	0.00
8	2018	117		PJM	4470010	(149,687.74)	(3,074,487.00)

8	2018 117		PJM	4470010	485.72	0.00
8	2018 117		PJM	4470010	74.01	0.00
8	2018 117		PJM	4470010	233.85	0.00
8	2018 117		PJM	4470010	0.00	0.00
8	2018 117		PJM	4470010	(0.02)	0.00
8	2018 117		PJM	4470010	40.37	0.00
8	2018 117		PJM	4470010	19.77	0.00
8	2018 117		PJM	4470010	38.09	0.00
8	2018 117		PJM	4470010	4.46	0.00
8	2018 117		PJM	4470010	12.61	0.00
8	2018 117		PJM	4470010	9.22	0.00
8	2018 117	PEQT	TRED2	4470010	(8.30)	0.00
8	2018 117	PHRT	APBE2	4470010	(1.51)	0.00
8	2018 117	PHRT	ICET2	4470010	(43.28)	0.00
8	2018 117	PHRT	SPSR2	4470010	(7.69)	0.00
8	2018 117	PHRT	TRED2	4470010	(8.30)	0.00
8	2018 117	PICT	AMRX2	4470010	(127.36)	0.00
8	2018 117	PICT	APBE2	4470010	(77.16)	0.00
8	2018 117	PICT	BGCF2	4470010	0.00	0.00
8	2018 117	PICT	EVOF2	4470010	(143.34)	0.00
8	2018 117	PICT	ICET2	4470010	(17.68)	0.00
8	2018 117	PICT	IVGE2	4470010	(72.42)	0.00
8	2018 117	PICT	PREE2	4470010	(252.50)	0.00
8	2018 117	PICT	SPSR2	4470010	(64.12)	0.00
8	2018 117	PICT	TFSF2	4470010	(14.33)	0.00
8	2018 117	PICT	TRED2	4470010	(38.47)	0.00
8	2018 117	PSHD	AMRX2	4470010	(7.17)	0.00
8	2018 117	PSHD	APBE2	4470010	0.00	0.00
8	2018 117	PSHD	EVOF2	4470010	(42.25)	0.00
8	2018 117	PSHD	IVGE2	4470010	0.00	0.00
8	2018 117	PSHD	PREE2	4470010	(14.33)	0.00
8	2018 117	PSHD	SPSR2	4470010	(7.54)	0.00
				4470010 Total	(648,520.22)	
8	2018 117	KBRA	RBCC2	4470081	185.21	0.00
8	2018 117	KSHD	RBCC2	4470081	22,725.44	0.00
				4470081 Total	22,910.65	
8	2018 117	PEQT	MSUI2	4470082	(867.89)	0.00
8	2018 117	PEQT	RBCC2	4470082	637.19	0.00
8	2018 117	PHRT	MSUI2	4470082	(1,232.54)	0.00
8	2018 117	PHRT	RBCC2	4470082	(4,503.09)	0.00
8	2018 117	PICT	MSUI2	4470082	13,843.68	0.00
8	2018 117	PICT	RBCC2	4470082	33,926.97	0.00
8	2018 117	PICT	WVPA	4470082	(1,840.32)	0.00

8	2018 117	PJST	RBCC2	4470082	(2,223.32)	0.00
8	2018 117	PSHD	MSUI2	4470082	(1,173.77)	0.00
8	2018 117	PSHD	RBCC2	4470082	(9,842.31)	0.00
				4470082 Total	26,724.60	
8	2018 117		PJM	4470089	2,068,663.36	0.00
				4470089 Total	2,068,663.36	
8	2018 117		PJM	4470098	0.13	0.00
8	2018 117		PJM	4470098	(2,242.57)	0.00
				4470098 Total	(2,242.44)	
8	2018 117		PJM	4470099	59,818.22	0.00
				4470099 Total	59,818.22	
8	2018 117		PJM	4470100	150,946.42	0.00
				4470100 Total	150,946.42	
8	2018 117		PJM	4470103	4,873,418.23	194,528,431.00
				4470103 Total	4,873,418.23	
8	2018 117		PJM	4470107	(0.84)	0.00
				4470107 Total	(0.84)	
8	2018 117	PHHS	DLPM	4470112	262,685.21	5,406,000.00
8	2018 117	PHHS	DPLG	4470112	(1.49)	0.00
				4470112 Total	262,683.72	
8	2018 117		PJM	4470115	3,510.25	0.00
				4470115 Total	3,510.25	
8	2018 117		PJM	4470126	(117,328.11)	0.00
				4470126 Total	(117,328.11)	
8	2018 117		PJM	4470127	46,921.25	0.00
				4470127 Total	46,921.25	
8	2018 117		PJM	4470131	(247,842.85)	(4,745,345.00)
8	2018 117		PJM	4470131	(38,033.57)	(763,262.00)
8	2018 117		PJM	4470131	(250.08)	(4,746.00)
8	2018 117		PJM	4470131	1,550.58	57,791.00
				4470131 Total	(284,575.92)	
8	2018 117	PHHS	AMRX2	4470143	0.00	0.00
8	2018 117	PHHS	APBE2	4470143	(234.81)	0.00
8	2018 117	PHHS	EVOF2	4470143	(22.83)	0.00
8	2018 117	PHHS	ICET2	4470143	(30.95)	0.00
8	2018 117	PHHS	IVGE2	4470143	(1,011.24)	0.00
8	2018 117	PHHS	MSUI2	4470143	(920.17)	0.00
8	2018 117	PHHS	PREE2	4470143	(148.95)	0.00
8	2018 117	PHHS	RBCC2	4470143	(69,033.08)	0.00
8	2018 117	PHHS	TFSF2	4470143	(53.07)	0.00
				4470143 Total	(71,455.10)	
8	2018 117		OHPA2	4470151	152,283.86	3,074,578.45
				4470151 Total	152,283.86	

8	2018 117	Physical	NASIA	4470175	877,973.35	0.00
8	2018 117	Trading	NASIA	4470175	56,572.09	0.00
				4470175 Total	934,545.44	
8	2018 117	Physical	NASIA	4470176	(877,973.35)	0.00
8	2018 117	Trading	NASIA	4470176	(56,572.09)	0.00
				4470176 Total	(934,545.44)	
8	2018 117		PJM	4470206	66,382.25	0.00
				4470206 Total	66,382.25	
8	2018 117		PJM	4470209	(326,767.36)	0.00
				4470209 Total	(326,767.36)	
8	2018 117		PJM	4470214	3,195.07	0.00
				4470214 Total	3,195.07	
8	2018 117		PJM	4470215	(3,171.12)	0.00
				4470215 Total	(3,171.12)	
8	2018 117		PJM	4470220	63,667.87	0.00
				4470220 Total	63,667.87	
8	2018 117		PJM	4470221	7,133.49	0.00
				4470221 Total	7,133.49	
8	2018 117		PJM	5550039	2,178.04	0.00
				5550039 Total	2,178.04	
8	2018 117		PJM	5550099	124.83	0.00
8	2018 117		PJM	5550099	60.97	0.00
8	2018 117		PJM	5550099	84.65	0.00
8	2018 117		PJM	5550099	124.39	0.00
8	2018 117		PJM	5550099	98.41	0.00
8	2018 117		PJM	5550099	195.30	0.00
8	2018 117		PJM	5550099	29.18	0.00
8	2018 117		PJM	5550099	30.59	0.00
8	2018 117		PJM	5550099	88.85	0.00
				5550099 Total	837.17	
8	2018 110		PJME2	5570007	(17.15)	(4,287.00)
8	2018 110		VITOL	5570007	(3,885.16)	(754.00)
				5570007 Total	(3,902.31)	
8	2018 117		PJM	5614000	0.00	0.00
8	2018 117		PJM	5614000	(26,621.81)	0.00
				5614000 Total	(26,621.81)	
8	2018 117		PJM	5614008	(346.24)	0.00
8	2018 117		PJM	5614008	(2,561.87)	0.00
8	2018 117		PJM	5614008	(21.78)	0.00
8	2018 180		PJM	5614008	0.00	0.00
				5614008 Total	(2,929.89)	
8	2018 117		PJM	5618000	0.00	0.00
8	2018 117		PJM	5618000	(6,341.71)	0.00

8	2018 117	PJM	5618000	(16.98)	0.00
			5618000 Total	(6,358.69)	
8	2018 117	PJM	5757000	0.00	0.00
8	2018 117	PJM	5757000	(25,077.38)	0.00
8	2018 117	PJM	5757000	(407.64)	0.00
			5757000 Total	(25,485.02)	
			August Grand Total	6,849,359.63	

Pd	Year	Unit	Ref	Trkg Cd	Account	Revenue	KWH Metered
9	2018	117		OHPA2	4470001	(24.10)	0.00
					4470001 Total	(24.10)	
9	2018	117		PJM	4470006	(176,709.82)	(6,221,537.00)
9	2018	117	NEQT	DEOI2	4470006	86,391.04	1,793,000.00
9	2018	117	PHRT	APBE2	4470006	(35.08)	0.00
9	2018	117	PHRT	EVOF2	4470006	(25.27)	0.00
9	2018	117	PICT	AMRX2	4470006	(346.31)	0.00
9	2018	117	PICT	APBE2	4470006	(98.43)	0.00
9	2018	117	PICT	BGCF2	4470006	0.00	0.00
9	2018	117	PICT	CECA2	4470006	150,860.39	5,808,880.00
9	2018	117	PICT	DPLG	4470006	14,024.37	288,000.00
9	2018	117	PICT	EVOF2	4470006	(107.77)	0.00
9	2018	117	PICT	FESC	4470006	220,315.84	4,761,000.00
9	2018	117	PICT	IVGE2	4470006	(88.08)	0.00
9	2018	117	PICT	PPLT2	4470006	61,399.87	1,264,000.00
9	2018	117	PICT	PREE2	4470006	(492.82)	0.00
9	2018	117	PICT	TFSF2	4470006	(47.01)	0.00
9	2018	117	PICT	TRED2	4470006	(125.70)	0.00
9	2018	117	PSHD	AMRX2	4470006	0.00	0.00
9	2018	117	PSHD	DLPM	4470006	4,469.77	0.00
9	2018	117	PSHD	EVOF2	4470006	(9.81)	0.00
9	2018	117	PSHD	IVGE2	4470006	(53.11)	0.00
9	2018	117	PSHD	PREE2	4470006	(26.78)	0.00
9	2018	117	PSHD	TFSF2	4470006	(11.88)	0.00
					4470006 Total	359,283.41	
9	2018	117		ICET2	4470010	(701.96)	0.00
9	2018	117		PJM	4470010	0.42	0.00
9	2018	117		PJM	4470010	(15,753.90)	(285,889.00)
9	2018	117		PJM	4470010	(108,735.47)	(1,956,324.00)
9	2018	117		PJM	4470010	(56,974.52)	(1,259,932.00)
9	2018	117		PJM	4470010	(269,048.30)	(4,740,695.00)
9	2018	117		PJM	4470010	2.82	0.00
9	2018	117		PJM	4470010	1.75	0.00
9	2018	117		PJM	4470010	(142,190.50)	(2,678,597.00)
9	2018	117		PJM	4470010	0.00	0.00
9	2018	117	PEQT	PREE2	4470010	(66.01)	0.00
9	2018	117	PEQT	TFSF2	4470010	(9.08)	0.00
9	2018	117	PEQT	TRED2	4470010	0.00	0.00
9	2018	117	PHRT	APBE2	4470010	(0.75)	0.00
9	2018	117	PHRT	EVOF2	4470010	(60.35)	0.00
9	2018	117	PHRT	ICET2	4470010	(35.36)	0.00
9	2018	117	PHRT	SPSR2	4470010	0.00	0.00

9	2018	117	PHRT	TRED2	4470010	0.00	0.00
9	2018	117	PICT	AMRX2	4470010	(127.82)	0.00
9	2018	117	PICT	APBE2	4470010	(292.76)	0.00
9	2018	117	PICT	BGCF2	4470010	(16.60)	0.00
9	2018	117	PICT	EVOF2	4470010	(81.81)	0.00
9	2018	117	PICT	ICET2	4470010	(17.68)	0.00
9	2018	117	PICT	IVGE2	4470010	(53.19)	0.00
9	2018	117	PICT	PREE2	4470010	(350.11)	0.00
9	2018	117	PICT	SPSR2	4470010	(18.48)	0.00
9	2018	117	PICT	TFSF2	4470010	(71.75)	0.00
9	2018	117	PICT	TRED2	4470010	(106.28)	0.00
9	2018	117	PSHD	AMRX2	4470010	(21.69)	0.00
9	2018	117	PSHD	EVOF2	4470010	0.00	0.00
9	2018	117	PSHD	IVGE2	4470010	(84.79)	0.00
9	2018	117	PSHD	PREE2	4470010	(36.97)	0.00
9	2018	117	PSHD	SPSR2	4470010	0.00	0.00
9	2018	117	PSHD	TFSF2	4470010	(16.60)	0.00
					4470010 Total	(594,867.74)	
9	2018	117	KBRA	RBCC2	4470081	(327.48)	0.00
9	2018	117	KSHD	RBCC2	4470081	10,983.00	0.00
					4470081 Total	10,655.52	
9	2018	117	PEQT	MSUI2	4470082	(1,118.21)	0.00
9	2018	117	PEQT	RBCC2	4470082	(79.56)	0.00
9	2018	117	PHRT	MSUI2	4470082	(112.20)	0.00
9	2018	117	PHRT	RBCC2	4470082	(4,272.99)	0.00
9	2018	117	PICT	MSUI2	4470082	(57,579.03)	0.00
9	2018	117	PICT	RBCC2	4470082	112,172.85	0.00
9	2018	117	PICT	WVPA	4470082	(4,416.37)	0.00
9	2018	117	PJST	RBCC2	4470082	(2,823.71)	0.00
9	2018	117	PSHD	MSUI2	4470082	(32,387.25)	0.00
9	2018	117	PSHD	RBCC2	4470082	16,634.83	0.00
					4470082 Total	26,018.36	
9	2018	117		PJM	4470089	837,068.32	0.00
					4470089 Total	837,068.32	
9	2018	117		PJM	4470098	4.58	0.00
9	2018	117		PJM	4470098	(6,522.66)	0.00
					4470098 Total	(6,518.08)	
9	2018	117		PJM	4470099	94,316.49	0.00
					4470099 Total	94,316.49	
9	2018	117		PJM	4470100	17,265.26	0.00
					4470100 Total	17,265.26	
9	2018	117		PJM	4470103	2,751,507.41	103,819,209.00
					4470103 Total	2,751,507.41	

9	2018	117		PJM	4470107	(0.84)	0.00
					4470107 Total	(0.84)	
9	2018	117	PHHS	DLPM	4470112	210,671.93	4,181,000.00
					4470112 Total	210,671.93	
9	2018	117		PJM	4470115	2,459.32	0.00
					4470115 Total	2,459.32	
9	2018	117		PJM	4470126	(5,088.49)	0.00
					4470126 Total	(5,088.49)	
9	2018	117		PJM	4470127	15,300.41	0.00
					4470127 Total	15,300.41	
9	2018	117		PJM	4470131	1.53	0.00
9	2018	117		PJM	4470131	(209,438.70)	(3,539,555.00)
9	2018	117		PJM	4470131	(33,005.81)	(588,695.00)
9	2018	117		PJM	4470131	84.64	0.00
9	2018	117		PJM	4470131	807.59	0.00
					4470131 Total	(241,550.75)	
9	2018	117	PHHS	APBE2	4470143	(68.93)	0.00
9	2018	117	PHHS	EVOF2	4470143	(155.65)	0.00
9	2018	117	PHHS	ICET2	4470143	(26.75)	0.00
9	2018	117	PHHS	IVGE2	4470143	(888.27)	0.00
9	2018	117	PHHS	MSUI2	4470143	3,612.00	0.00
9	2018	117	PHHS	PREE2	4470143	(287.27)	0.00
9	2018	117	PHHS	RBCC2	4470143	(205,246.36)	0.00
9	2018	117	PHHS	TFSF2	4470143	0.00	0.00
					4470143 Total	(203,061.23)	
9	2018	117		OHPA2	4470151	132,675.65	2,678,692.81
					4470151 Total	132,675.65	
9	2018	117	Physical	NASIA	4470175	(259,965.67)	0.00
9	2018	117	Trading	NASIA	4470175	354.86	0.00
					4470175 Total	(259,610.81)	
9	2018	117	Physical	NASIA	4470176	259,965.67	0.00
9	2018	117	Trading	NASIA	4470176	(354.86)	0.00
					4470176 Total	259,610.81	
9	2018	117		PJM	4470206	29,710.94	0.00
					4470206 Total	29,710.94	
9	2018	117		PJM	4470209	(129,045.65)	0.00
					4470209 Total	(129,045.65)	
9	2018	117		PJM	4470214	33,654.08	0.00
					4470214 Total	33,654.08	
9	2018	117		PJM	4470215	(24,046.94)	0.00
					4470215 Total	(24,046.94)	
9	2018	117		PJM	4470220	77,569.23	0.00
					4470220 Total	77,569.23	

9	2018 117	PJM	4470221	2,941.61	0.00
			4470221 Total	2,941.61	
9	2018 117	PJM	5550039	(62.96)	0.00
			5550039 Total	(62.96)	
9	2018 110	PJME2	5570007	(21.19)	(5,298.00)
			5570007 Total	(21.19)	
9	2018 117	PJM	5614000	0.00	0.00
9	2018 117	PJM	5614000	(16,320.63)	0.00
			5614000 Total	(16,320.63)	
9	2018 117	PJM	5614008	(213.94)	0.00
9	2018 117	PJM	5614008	(212.12)	0.00
9	2018 117	PJM	5614008	(1,118.50)	0.00
9	2018 117	PJM	5614008	(1,488.32)	0.00
9	2018 117	PJM	5614008	(309.79)	0.00
9	2018 117	PJM	5614008	(149.38)	0.00
9	2018 117	PJM	5614008	(108.24)	0.00
9	2018 117	PJM	5614008	(487.08)	0.00
9	2018 117	PJM	5614008	(0.26)	0.00
9	2018 117	PJM	5614008	(0.13)	0.00
9	2018 117	PJM	5614008	(3,977.60)	0.00
9	2018 117	PJM	5614008	(500.86)	0.00
9	2018 117	PJM	5614008	(229.12)	0.00
9	2018 117	PJM	5614008	(33.84)	0.00
9	2018 117	PJM	5614008	(231.71)	0.00
9	2018 180	PJM	5614008	0.00	0.00
			5614008 Total	(9,060.89)	
9	2018 117	PJM	5618000	0.00	0.00
9	2018 117	PJM	5618000	(3,873.09)	0.00
9	2018 117	PJM	5618000	(16.29)	0.00
			5618000 Total	(3,889.38)	
9	2018 117	PJM	5757000	0.00	0.00
9	2018 117	PJM	5757000	(14,829.92)	0.00
9	2018 117	PJM	5757000	(391.15)	0.00
			5757000 Total	(15,221.07)	
			September Grand Total	3,352,318.00	

Pd	Year	Unit	Ref	Trkg Cd	Account	Revenue	KWH Metered
10	2018	117		NASIA	4470006	0.00	0.00
10	2018	117		PJM	4470006	38.60	0.00
10	2018	117	NEQT	DEOI2	4470006	104,389.92	1,944,000.00
10	2018	117	PHRT	APBE2	4470006	(7.92)	0.00
10	2018	117	PHRT	EVOF2	4470006	0.00	0.00
10	2018	117	PHRT	IVGE2	4470006	(31.68)	0.00
10	2018	117	PHRT	PREE2	4470006	(146.40)	0.00
10	2018	117	PICT	AMRX2	4470006	(145.93)	0.00
10	2018	117	PICT	APBE2	4470006	(153.04)	0.00
10	2018	117	PICT	CECA2	4470006	0.00	0.00
10	2018	117	PICT	DPLG	4470006	13,545.19	278,000.00
10	2018	117	PICT	EVOF2	4470006	(72.99)	0.00
10	2018	117	PICT	FESC	4470006	210,721.33	4,561,000.00
10	2018	117	PICT	IVGE2	4470006	(70.98)	0.00
10	2018	117	PICT	PPLT2	4470006	59,497.07	1,225,000.00
10	2018	117	PICT	PREE2	4470006	(341.45)	0.00
10	2018	117	PICT	SPSR2	4470006	(4.15)	0.00
10	2018	117	PICT	TFSF2	4470006	(196.71)	0.00
10	2018	117	PICT	TRED2	4470006	(22.48)	0.00
10	2018	117	PSHD	APBE2	4470006	(8.30)	0.00
10	2018	117	PSHD	DLPM	4470006	(1,161.39)	0.00
10	2018	117	PSHD	EVOF2	4470006	(7.54)	0.00
10	2018	117	PSHD	IVGE2	4470006	(31.68)	0.00
10	2018	117	PSHD	PREE2	4470006	(36.97)	0.00
10	2018	117	PSHD	SPSR2	4470006	(7.92)	0.00
10	2018	117	PSHD	TFSF2	4470006	(30.52)	0.00
					4470006 Total	385,714.06	
10	2018	117		ICET2	4470010	(682.70)	0.00
10	2018	117		PJM	4470010	(15,057.14)	(277,461.00)
10	2018	117		PJM	4470010	(105,314.64)	(1,941,435.00)
10	2018	117		PJM	4470010	(61,838.50)	(1,224,766.00)
10	2018	117		PJM	4470010	(264,055.26)	(4,549,623.00)
10	2018	117		PJM	4470010	(27.36)	0.00
10	2018	117		PJM	4470010	(14.81)	0.00
10	2018	117		PJM	4470010	(128,217.56)	(2,334,133.00)
10	2018	117	PEQT	PREE2	4470010	0.00	0.00
10	2018	117	PEQT	TFSF2	4470010	0.00	0.00
10	2018	117	PHRT	APBE2	4470010	(10.94)	0.00
10	2018	117	PHRT	EVOF2	4470010	0.00	0.00
10	2018	117	PHRT	ICET2	4470010	(45.55)	0.00
10	2018	117	PHRT	IVGE2	4470010	(31.68)	0.00
10	2018	117	PICT	AMRX2	4470010	(60.17)	0.00

10	2018	117	PICT	APBE2	4470010	(166.83)	0.00
10	2018	117	PICT	BGCF2	4470010	(4.15)	0.00
10	2018	117	PICT	EVOF2	4470010	(73.65)	0.00
10	2018	117	PICT	ICET2	4470010	(17.68)	0.00
10	2018	117	PICT	IVGE2	4470010	(73.98)	0.00
10	2018	117	PICT	PREE2	4470010	(188.94)	0.00
10	2018	117	PICT	SPSR2	4470010	(3.77)	0.00
10	2018	117	PICT	TFSF2	4470010	(165.08)	0.00
10	2018	117	PICT	TRED2	4470010	(10.72)	0.00
10	2018	117	PSHD	AMRX2	4470010	0.00	0.00
10	2018	117	PSHD	APBE2	4470010	(4.53)	0.00
10	2018	117	PSHD	EVOF2	4470010	(30.18)	0.00
10	2018	117	PSHD	IVGE2	4470010	(62.62)	0.00
10	2018	117	PSHD	PREE2	4470010	(38.47)	0.00
10	2018	117	PSHD	TFSF2	4470010	(18.63)	0.00
					4470010 Total	(576,215.54)	
10	2018	117	KBRA	RBCC2	4470081	(242.39)	0.00
10	2018	117	KSHD	RBCC2	4470081	(14,521.41)	0.00
					4470081 Total	(14,763.80)	
10	2018	117	PEQT	MSUI2	4470082	1,776.61	0.00
10	2018	117	PEQT	RBCC2	4470082	43.81	0.00
10	2018	117	PHRT	MSUI2	4470082	(388.99)	0.00
10	2018	117	PHRT	RBCC2	4470082	(565.97)	0.00
10	2018	117	PICT	MSUI2	4470082	20,196.97	0.00
10	2018	117	PICT	RBCC2	4470082	27,428.76	0.00
10	2018	117	PICT	WVPA	4470082	(6,635.16)	0.00
10	2018	117	PJST	RBCC2	4470082	213.38	0.00
10	2018	117	PSHD	MSUI2	4470082	(11,795.11)	0.00
10	2018	117	PSHD	RBCC2	4470082	(413.40)	0.00
					4470082 Total	29,860.90	
10	2018	117		NASIA	4470089	0.00	0.00
10	2018	117		PJM	4470089	912,616.94	0.00
					4470089 Total	912,616.94	
10	2018	117		NASIA	4470098	0.00	0.00
10	2018	117		PJM	4470098	7.60	0.00
10	2018	117		PJM	4470098	4,226.82	0.00
					4470098 Total	4,234.42	
10	2018	117		NASIA	4470099	0.00	0.00
10	2018	117		PJM	4470099	95,803.14	0.00
					4470099 Total	95,803.14	
10	2018	117		NASIA	4470100	0.00	0.00
10	2018	117		PJM	4470100	105,050.91	0.00
					4470100 Total	105,050.91	

10	2018	117		NASIA	4470103	0.00	0.00
10	2018	117		PJM	4470103	2,876,822.79	98,766,161.00
					4470103 Total	2,876,822.79	
10	2018	117		PJM	4470107	(0.82)	0.00
					4470107 Total	(0.82)	
10	2018	117		PJM	4470110	0.02	0.00
					4470110 Total	0.02	
10	2018	117		NASIA	4470112	0.00	0.00
10	2018	117	PHHS	DLPM	4470112	99,730.89	1,910,000.00
					4470112 Total	99,730.89	
10	2018	117		NASIA	4470115	0.00	0.00
10	2018	117		PJM	4470115	2,034.09	0.00
					4470115 Total	2,034.09	
10	2018	117		PJM	4470126	66,975.23	0.00
					4470126 Total	66,975.23	
10	2018	117		PJM	4470127	16,320.43	0.00
					4470127 Total	16,320.43	
10	2018	117		PJM	4470131	(97,268.08)	(1,602,486.00)
10	2018	117		PJM	4470131	(16,802.18)	(304,837.00)
10	2018	117		PJM	4470131	23.03	0.00
10	2018	117		PJM	4470131	75.22	0.00
					4470131 Total	(113,972.01)	
10	2018	117	PHHS	AMRX2	4470143	(33.07)	0.00
10	2018	117	PHHS	APBE2	4470143	(64.00)	0.00
10	2018	117	PHHS	EVOF2	4470143	(100.72)	0.00
10	2018	117	PHHS	ICET2	4470143	(24.11)	0.00
10	2018	117	PHHS	IVGE2	4470143	(154.44)	0.00
10	2018	117	PHHS	MSUI2	4470143	(18,403.67)	0.00
10	2018	117	PHHS	PREE2	4470143	(40.12)	0.00
10	2018	117	PHHS	RBCC2	4470143	(136,746.29)	0.00
					4470143 Total	(155,566.42)	
10	2018	117		OHPA2	4470151	115,619.33	2,334,184.43
					4470151 Total	115,619.33	
10	2018	117	Physical	NASIA	4470175	134,813.16	0.00
10	2018	117	Trading	NASIA	4470175	(15,509.18)	0.00
					4470175 Total	119,303.98	
10	2018	117	Physical	NASIA	4470176	(134,813.16)	0.00
10	2018	117	Trading	NASIA	4470176	15,509.18	0.00
					4470176 Total	(119,303.98)	
10	2018	117		PJM	4470206	14,762.39	0.00
					4470206 Total	14,762.39	
10	2018	117		PJM	4470209	(70,644.22)	0.00
					4470209 Total	(70,644.22)	

10	2018 117	NASIA	4470214	0.00	0.00
10	2018 117	PJM	4470214	3,873.53	0.00
			4470214 Total	3,873.53	
10	2018 117	NASIA	4470215	0.00	0.00
10	2018 117	PJM	4470215	(2,835.96)	0.00
			4470215 Total	(2,835.96)	
10	2018 117	NASIA	4470220	0.00	0.00
10	2018 117	PJM	4470220	70,994.10	0.00
			4470220 Total	70,994.10	
10	2018 117	NASIA	4470221	0.00	0.00
10	2018 117	PJM	4470221	3,791.52	0.00
			4470221 Total	3,791.52	
10	2018 117	PJM	4470222	15.72	0.00
			4470222 Total	15.72	
10	2018 117	PJM	5550039	(2,157.58)	0.00
			5550039 Total	(2,157.58)	
10	2018 110	APBE2	5570007	(19.24)	(113.00)
10	2018 110	BGCS2	5570007	(226.32)	(1,886.00)
10	2018 110	DTET	5570007	(11,316.00)	(1,886.00)
10	2018 110	PJME2	5570007	(20.35)	(5,088.00)
			5570007 Total	(11,581.91)	
10	2018 117	PJM	5614000	0.00	0.00
10	2018 117	PJM	5614000	(12,378.03)	0.00
			5614000 Total	(12,378.03)	
10	2018 180	PJM	5614008	0.00	0.00
			5614008 Total	0.00	
10	2018 117	PJM	5618000	0.00	0.00
10	2018 117	PJM	5618000	(3,264.72)	0.00
10	2018 117	PJM	5618000	(14.98)	0.00
			5618000 Total	(3,279.70)	
10	2018 117	PJM	5757000	0.00	0.00
10	2018 117	PJM	5757000	(12,090.75)	0.00
10	2018 117	PJM	5757000	(359.36)	0.00
			5757000 Total	(12,450.11)	
			October Grand Total	3,828,374.31	

Kentucky Power company
KPSC Case No. 2019-00002
Commission Staff's First Set of Data Requests
Dated February 11, 2019

DATA REQUEST

- KPSC_14 Describe the effect on the FAC calculation of line losses related to:
- a. Intersystem sales when using a third-party transmission system, and
 - b. Intersystem sales when not using a third-party transmission system.

RESPONSE

a. Beginning on June 1, 2007, based on FERC Order EL06-055, PJM modified the Locational Marginal Pricing (LMP) approach to calculate transmission line loss costs on a marginal basis. The new LMP calculation reflects the full marginal cost of serving an increment of load at each bus from each resource associated with an eligible energy offer. The LMP price will be the sum of three separate components: System Energy Price, Congestion Price, and Loss Price. Therefore, each spot market energy customer pays an energy price that includes the full marginal cost of energy for delivering an increment of energy to the purchaser's location. Market buyers are assessed for their incremental impact on transmission line losses resulting from total load scheduled to be served from the PJM Spot Energy Market in the day-ahead energy market at the same day-ahead loss price applicable at the relevant load bus.

Market sellers are assessed for their incremental impact on transmission line losses resulting from energy scheduled for delivery in the day-ahead market at the day-ahead loss prices applicable to the relevant resource bus.

Transactions are balanced in the real-time market using the same calculation, but are based on deviation at each bus from the day-ahead using the real time loss price.

b. Kentucky Power conducts intersystem sales through its participation in the PJM wholesale markets. Please refer to part (a) for a description of the effect of losses on intersystem sales on the FAC calculation.

Witness: Ranie K. Wohnhas

Kentucky Power company
KPSC Case No. 2019-00002
Commission Staff's First Set of Data Requests
Dated February 11, 2019

DATA REQUEST

KPSC_15 Provide a list, in chronological order, showing by unit, any scheduled, actual, and forced outages between for the last six months of the period under review. Provide a key for any information that is abbreviated.

RESPONSE

For a list of the Company's generating units' outages during the period under review, please see KPCO_R_KPSC_1_15_Attachment1.pdf.

Witness: Douglas J. Rosenberger
 David L. Mell

Kentucky Power Company
Fuel Adjustment Case No. 2019-00002
Generating Unit Outages
May 1, 2018-October 31, 2018

Unit Name	Event Type *	Event Start	Event End	Event Description
Big Sandy 1	PO	3/3/18 12:00 AM	6/4/18 11:00 PM	General Maintenance including HP Turbine i/r, IP/SFLP Turbine i/r, warranty i/r from Mitsubishi Upgrade.
Big Sandy 1	MO	6/4/18 11:01 PM	6/8/18 1:27 AM	Boiler i/r, repair steam leak on the main turbine.
Big Sandy 1	FO	6/8/18 2:16 AM	6/8/18 5:21 AM	Fuel Trip - burner limit switch failure
Big Sandy 1	MO	6/10/18 3:55 AM	6/16/18 5:00 PM	Casing Leak Repairs & Main Turbine Repairs & Boiler i/r
Big Sandy 1	MO	6/21/18 12:10 AM	6/23/18 11:00 PM	Boiler i/r
Big Sandy 1	MO	8/21/18 12:34 AM	8/24/18 3:00 PM	Boiler i/r
Big Sandy 1	MO	9/8/18 1:06 AM	9/11/18 1:30 AM	Boiler i/r, clean the Aux. Condenser Waterbox
Big Sandy 1	MO	10/11/18 11:49 PM	10/15/18 4:31 AM	Boiler i/r.
Big Sandy 1	MO	10/19/18 12:11 AM	10/22/18 3:00 PM	Boiler i/r
Mitchell 1	FO	5/24/18 4:09 PM	5/26/18 5:53 PM	steam leak on 1st reheat exhaust drain line
Mitchell 1	FO	6/2/18 8:30 AM	6/17/18 4:27 PM	Generator Stator Cooling Water Leak - factory weld failure
Mitchell 1	FO	6/19/18 1:29 AM	6/28/18 8:58 PM	Tube Leak & Generator Stator Cooling Water Leak - repair failure
Mitchell 1	FO	7/17/18 3:01 PM	7/24/18 9:43 AM	Economizer tube leak
Mitchell 1	FO	8/18/18 1:35 AM	8/18/18 3:19 PM	Generator Stator Water Cooling Leak - External fitting
Mitchell 1	MO	8/19/18 8:23 AM	8/21/18 9:40 AM	Boiler i/r, ID Fan Hubs i/r
Mitchell 1	FO	9/21/18 7:13 AM	9/25/18 4:11 PM	Generator Stator Cooling Water Leak - gasket leak on a filter cover
Mitchell 1	MO	9/25/18 4:11 PM	10/5/18 3:00 AM	ID Fan Hub inspection. Boiler i/r
Mitchell 1	FO	10/5/18 4:53 PM	10/7/18 7:28 PM	ID Fan 11 inlet damper stuck closed
Mitchell 2	PO	3/3/18 12:15 AM	5/3/18 9:00 AM	General Maintenance including Generator i/r and Turbine Control Valve i/r. Generator Field inspection, Precipitator Roof Bay replacements, Precipitator PLC upgrade, Coal Handling PLC upgrade
Mitchell 2	FO	5/3/18 9:00 AM	5/6/18 10:57 AM	Above Seat Drain line leak
Mitchell 2	FO	5/23/18 8:07 AM	5/28/18 12:00 AM	EHC fluid leak at #4 main turbine control valve
Mitchell 2	FO	5/29/18 12:39 AM	5/29/18 3:02 AM	BFP steam supply issue
Mitchell 2	MO	6/12/18 11:31 PM	6/16/18 9:15 PM	22 ID Fan Motor Coupling Alignment & Lead Terminations
Mitchell 2	MO	9/8/18 1:33 AM	9/23/18 10:10 PM	Boiler i/r, Precipitator Inspection
Mitchell 2	MO	10/16/18 11:34 PM	10/25/18 6:00 PM	Furnace Waterwall Tube Leak

Event Type *

FO Forced Outage

MO Maintenance Outage

PO Planned Outage

Note: i/r = inspection and repair

Note: Big Sandy schedules a short 2 to 3 day Boiler i/r after each service period

Kentucky Power company
KPSC Case No. 2019-00002
Commission Staff's First Set of Data Requests
Dated February 11, 2019

DATA REQUEST

KPSC_16 For the last six months of the period under review, provide the monthly capacity factor at which each generating unit operated.

RESPONSE

For the period under review, please see KPCO_R_KPSC_1_16_Attachment1.pdf for the monthly capacity factor of each of the Company's generating units.

Witness: Douglas J. Rosenberger
 David L. Mell

Kentucky Power Company Fuel Adjustment Case No. 2019-00002 Generating Unit Net Capacity Factor [%] May 1, 2018-October 31, 2018						
	18-May	18-Jun	18-Jul	18-Aug	18-Sep	18-Oct
Big Sandy 1	0.00	23.00	59.39	52.86	58.56	44.23
Mitchell 1	71.10	8.60	54.12	61.69	48.57	44.21
Mitchell 2	43.55	54.31	72.60	73.88	33.71	37.12

Kentucky Power company
KPSC Case No. 2019-00002
Commission Staff's First Set of Data Requests
Dated February 11, 2019

DATA REQUEST

KPSC_17

- a. For the last six months of the period under review, explain if Kentucky Power made any changes to its maintenance and operation practices, or completed any specific generation efficiency improvements that affect fuel usage at Kentucky Power's generation facilities.
- b. Describe the impact of these changes on Kentucky Power's fuel usage.

RESPONSE

For the period under review, the Company has not made any changes to its maintenance and operations practices, or completed any specific generation efficiency improvements that affect fuel usage at its generation facilities.

Witness: Douglas J. Rosenberger
 David L. Mell

Kentucky Power company
KPSC Case No. 2019-00002
Commission Staff's First Set of Data Requests
Dated February 11, 2019

DATA REQUEST

KPSC_18 State whether Kentucky Power is aware of any violations of its policies and procedures regarding fuel procurement that occurred prior to or during the last six months of the period under review.

RESPONSE

Kentucky Power is not aware of any violations of its policies and procedures regarding fuel procurement prior to or during the last six months of the period under review.

Witness: Clinton M. Stutler
 Amy E. Jeffries

Kentucky Power company
KPSC Case No. 2019-00002
Commission Staff's First Set of Data Requests
Dated February 11, 2019

DATA REQUEST

KPSC_19 State whether Kentucky Power is aware of any violations of 807 KAR 5:056 that occurred prior to or during the last six months of the period under review.

RESPONSE

The Company is not aware of any violations.

Witness: Ranie K. Wohnhas

Kentucky Power company
KPSC Case No. 2019-00002
Commission Staff's First Set of Data Requests
Dated February 11, 2019

DATA REQUEST

KPSC_20 State whether all fuel contracts related to commodity and transportation have been filed with the Commission. If any contracts have not been filed, explain why they have not been filed and provide a copy.

RESPONSE

All contracts have been filed with the Commission.

Witness: Ranie K. Wohnhas

Kentucky Power company
KPSC Case No. 2019-00002
Commission Staff's First Set of Data Requests
Dated February 11, 2019

DATA REQUEST

KPSC_21 For each generating station, state the methods of coal delivery currently available.

RESPONSE

The methods of coal delivery currently available at the Mitchell Plant are as follows:

- a. Barge
- b. Conveyor Belt

Coal could also be delivered by rail following an undetermined amount of maintenance to the track and unloading facility.

Witness: Amy E. Jeffries

Kentucky Power company
 KPSC Case No. 2019-00002
 Commission Staff's First Set of Data Requests
 Dated February 11, 2019

DATA REQUEST

KPSC_22

If a change in the base fuel cost is proposed, state the month to be used as the base period (b). If the base period results in a fuel cost other than one representative of current costs as prescribed by 807 KAR 5:056, Section 1 (2), explain why this base period was selected. If no change is proposed, include an explanation of the reason(s) Kentucky Power believes the current base period fuel cost should remain unchanged.

RESPONSE

The Company is proposing a new base fuel rate. The table below provides projected fuel costs and projected sales for the years 2019 and 2020. The projected cents per kWh fuel cost is above the current base fuel rate of 2.725 cents per kWh.

Year of Projection	Projected Fuel Cost	Projected kWh Sales	Projected Fuel Cost in cents/kWh	Fuel Cost in Current Base Rates in cents/kWh	Difference in Fuel Cost in cents/kWh
2019	\$174,134,560	6,199,610,000	2.80880	2.725	0.08380
2020	\$177,700,560	6,187,819,000	2.87178	2.725	0.14678
Average			2.84029	2.725	0.11529

The Company selected April 2017 as the representative month. April 2017 had a fuel cost of 2.851 cents per kWh. As shown in the table below, the difference between the projected fuel cost and the proposed base rate is (0.04220) cents per kWh in 2019 and 0.02078 cents per kWh in 2020. In addition, the 2019-2020 average projected fuel cost is (0.01071) cents per kWh below the proposed base.

Year of Projection	Projected Fuel Cost	Projected kWh Sales	Projected Fuel Cost in cents/kWh	Fuel Cost in New Base Rates in cents/kWh	Difference in Fuel Cost in cents/kWh
2019	\$174,134,560	6,199,610,000	2.80880	2.851	(0.04220)
2020	\$177,700,560	6,187,819,000	2.87178	2.851	0.02078
Average			2.84029	2.851	(0.01071)

Kentucky Power company
KPSC Case No. 2019-00002
Commission Staff's First Set of Data Requests
Dated February 11, 2019

Page 2 of 2

Calculation of the April 2017 cost is as follows:

$$\text{Dollars / kWh} = \frac{\text{Fuel (b) April 2017}}{\text{Sales (b) April 2017}} = \frac{\$ 11,814,526}{414,368,000 \text{ kWh}} = 0.02851 \text{ /kWh}$$

Witness: Ranie K. Wohnhas

Kentucky Power company
KPSC Case No. 2019-00002
Commission Staff's First Set of Data Requests
Dated February 11, 2019

DATA REQUEST

KPSC_23 Provide a calculation of the fossil fuel costs F(b) that Kentucky Power proposes to use to calculate the base period fuel cost. This calculation shall show each component of F(b) as defined by 807 KAR 5:056. Explain why the fuel cost in the selected base period is representative of the level of fuel cost currently being experienced by Kentucky Power.

RESPONSE

The Company is proposing to use April 2017 as its representative month. KPCO_R_KPSC_1_23_Attachment1.pdf provides the requested information concerning that month. The proposed base fuel cost of 2.851 cents per kWh varies by 1.1 percent from the average fuel cost (2.8835 cents per kWh) of the most recent two months of the review period and thus is representative of those costs.

Witness: Ranie K. Wohnhas

KENTUCKY POWER COMPANY

FINAL
 FUEL COST SCHEDULE

Month Ended: April 2017

A. Company Generation					
Coal Burned				(+)	\$4,550,407
Oil Burned				(+)	79,845
Gas Burned				(+)	1,215,150
Fuel (jointly owned plant)				(+)	0
Fuel (assigned cost during F. O.)				(+)	0
(0 KWH X \$0.000000)				(+)	0
Fuel (substitute for F. O.)				(-)	<u>0</u>
			Sub-total		<u>5,845,402</u>
B. Purchases					
Net Energy Cost - Economy Purchases				(+)	0
Identifiable Fuel Cost - Other Purchases				(+)	6,392,957
Identifiable Fuel Cost (substitute for F. O.)				(-)	0
(0 KWH X \$0.000000)				(-)	0
Purchase Adjustment for Peaking Unit Equivalent				(-)	288 (1)
			Sub-total		<u>6,392,669</u>
C. Inter-System Sales Fuel Costs					<u>616,660</u>
D. SUB-TOTAL FUEL COST (A + B - C)					<u>\$11,621,410</u>
E. Net Transmission Marginal Line Loss for month					193,116
			April 2017		
F. GRAND TOTAL FUEL COSTS (D + E)					<u><u>\$11,814,526</u></u>

(1) As calculated in accordance with KPSC Order dated October 3, 2002 in Case No. 2000-195-B.

Kentucky Power company
KPSC Case No. 2019-00002
Commission Staff's First Set of Data Requests
Dated February 11, 2019

DATA REQUEST

- KPSC_24 Provide a schedule showing each component of sales as defined by 807 KAR 5:056 in the selected base period (b). Explain why Kentucky Power believes that the sales in the selected base period (b) are representative of the level of kWh sales that Kentucky Power will derive from the level of fuel cost incurred during the selected base period (b).
- a. Separately provide the amounts of power purchases used in the calculation of sales provided.
 - b. Separately provide the amounts of intersystem power sales used in the calculation of sales provided.

RESPONSE

a & b. KPCO_R_KPCO_1_24_Attachment1.pdf provides the requested information for the Company's April 2017 sales. Although both fuel costs and sales are projected to be higher in 2019 and 2020, their resulting cents/kWh cost reasonably approximates that produced by the Company's April 2017 sales and costs. Please see the testimony of Company Witness Wohnhas for further explanation of why the Company chose April 2017 as the base month.

Witness: Ranie K. Wohnhas

KENTUCKY POWER COMPANY

SALES SCHEDULE

Month Ended: April 2017

		<u>Kilowatt-Hours</u>
A. Generation (Net)	(+)	222,386,000
Purchases Including Interchange In	(+)	<u>235,214,000</u>
Sub Total		457,600,000
B. Pumped Storage Energy	(+)	0
Inter-System Sales Including Interchange Out	(+)	20,762,000
System Losses	(+)	<u>22,470,000</u> *
Sub Total		<u>43,232,000</u>
Total Sales (A - B)		<u><u>414,368,000</u></u>

* Does not include 307,000 KWH of company usage.

Kentucky Power company
KPSC Case No. 2019-00002
Commission Staff's First Set of Data Requests
Dated February 11, 2019

DATA REQUEST

KPSC_25 Provide a schedule showing the calculation of Kentucky Power's proposed increase or decrease in its base fuel cost per kWh to be incorporated into its base rate.

RESPONSE

The Company is proposing to increase the base fuel cost from \$0.02725 / kWh to \$0.02851 / kWh. The proposed base fuel cost per kWh is calculated below.

$$\text{Dollars / kWh} = \frac{\text{Fuel (b) April 2017}}{\text{Sales (b) April 2017}} = \frac{\$ 11,814,526}{414,368,000 \text{ kWh}} = 0.02851 \text{ /kWh}$$

Witness: Ranie K. Wohnhas

Kentucky Power company
KPSC Case No. 2019-00002
Commission Staff's First Set of Data Requests
Dated February 11, 2019

DATA REQUEST

KPSC_26 Provide a schedule of the present and proposed rates that Kentucky Power seeks to change pursuant to 807 KAR 5:056, shown in comparative form.

RESPONSE

Please see KPCO_R_KPSC_1_26_Attachment1.pdf. The attachment provides a comparison of the Company's current rates based upon the current base fuel cost of 2.725 cents per kWh and the new proposed rates based upon the proposed base fuel cost rate of 2.851 cents per kWh for each customer class.

Witness: Ranie K. Wohnhas

KENTUCKY POWER COMPANY
Comparison of Current and Proposed Rates
Two Year Fuel Review
Case No.: 2019-00002

TARIFF	Tariff Code(s)	Current Energy Rate c/kWh	Energy - New Base Fuel Rate c/kWh
RS			
All kWh	015, 017, 022	9.684	9.810
Storage Water Htg. kWh			
80 gallons	012	6.086	6.212
100 gallons	013	6.086	6.212
120 gallons	014	6.086	6.212
RS-LM-TOD			
	028, 030, 032, 034		
On-Peak		14.378	14.504
Off-Peak		6.086	6.212
RS-TOD			
	036		
On-Peak		14.424	14.550
Off-Peak		6.086	6.212
RS-TOD 2			
	027		
On-Peak - Summer		17.879	18.005
On-Peak - Winter		15.382	15.508
Off-Peak		8.115	8.241
RSD			
	018		
On-Peak		9.764	9.890
Off-Peak		7.048	7.174
GS			
Secondary First 4450 kWh	211, 212, 215, 216, 218	9.826	9.952
Secondary Over 4450 kWh	211, 212, 215, 216, 218	9.817	9.943
Primary First 4450 kWh	217, 220	8.636	8.762
Primary Over 4450 kWh	217, 220	8.666	8.792
Subtransmission First 4450 kWh	236	7.822	7.948
Subtransmission Over 4450 kWh	236	7.855	7.981
GS - Recreational Lighting			
	214	9.992	10.118
GS-LM-TOD			
	223, 225		
On-Peak		14.494	14.620
Off-Peak		6.086	6.212
<u>Optional Unmetered Service Provision</u>			
	204, 213		
First 4450 kWh		9.826	9.952
Over 4450 kWh		9.817	9.943
SGS-TOD			
	227		
On-Peak - Summer		17.112	17.238
On-Peak - Winter		14.438	14.564
Off-Peak		7.545	7.671
MGS-TOD			
	229		
On-Peak		16.762	16.888
Off-Peak		6.086	6.212

KENTUCKY POWER COMPANY
Comparison of Current and Proposed Rates
Two Year Fuel Review
Case No.: 2019-00002

TARIFF	Tariff Code(s)	Current Energy Rate c/kWh	Energy - New Base Fuel Rate c/kWh
LGS			
Secondary	240, 242, 260	7.727	7.853
Primary	244, 246, 264	6.727	6.853
Subtransmission	248, 268	5.127	5.253
Transmission	250, 270	5.013	5.139
LGS-LM-TOD			
	251		
On-Peak		14.085	14.211
Off-Peak		6.097	6.223
LGS-TOD			
<u>Secondary</u>			
On-Peak	256	9.690	9.816
Off-Peak		4.140	4.266
<u>Primary</u>			
On-Peak	257	9.319	9.445
Off-Peak		4.019	4.145
<u>Subtransmission</u>			
On-Peak	258	9.195	9.321
Off-Peak		3.978	4.104
<u>Transmission</u>			
On-Peak	259	9.068	9.194
Off-Peak		3.936	4.062
IGS			
<u>Secondary</u>			
	356		
On-Peak Billing Demand			
Off-Peak Excess Billing Demand			
Off-Peak Billing Demand			
Minimum Demand			
All kWh		2.934	3.060
<u>Primary</u>			
	358, 370		
On-Peak Billing Demand			
Off-Peak Excess Billing Demand			
Off-Peak Billing Demand			
Minimum Demand			
All kWh		2.819	2.945
<u>Subtransmission</u>			
	359, 371		
On-Peak Billing Demand			
Off-Peak Excess Billing Demand			
Off-Peak Billing Demand			
Minimum Demand			
All kWh		2.770	2.896
<u>Transmission</u>			
	360, 372		
On-Peak Billing Demand			
Off-Peak Excess Billing Demand			
Off-Peak Billing Demand			
Minimum Demand			
All kWh		2.731	2.857
MW			
All kWh	540	9.141	9.267

KENTUCKY POWER COMPANY
Comparison of Current and Proposed Rates
Two Year Fuel Review
Case No.: 2019-00002

TARIFF	Tariff Code(s)	Current Base Fuel Rate x kWh in Sheet 14-3 c/kWh	New Base Fuel Rate x kWh in Sheet 14-3 c/kWh
OL			
<u>Overhead Lighting Service</u>			
High Pressure Sodium			
100 Watt	094	2.725	2.851
150 Watt	113	2.725	2.851
200 Watt	097	2.725	2.851
250 Watt	103	2.725	2.851
400 Watt	098	2.725	2.851
Mercury Vapor			
175 Watt	093	2.725	2.851
400 Watt	095	2.725	2.851
<u>Post Top Lighting Service</u>			
High Pressure Sodium			
100 Watt	111	2.725	2.851
150 Watt	122	2.725	2.851
200 Watt	121	2.725	2.851
250 Watt	120	2.725	2.851
400 Watt	126	2.725	2.851
Mercury Vapor			
175 Watt	099	2.725	2.851
<u>Flood Lighting Service</u>			
High Pressure Sodium			
200 Watt	107	2.725	2.851
400 Watt	109	2.725	2.851
Metal Halide			
250 Watt	110	2.725	2.851
400 Watt	116	2.725	2.851
1000 Watt	131	2.725	2.851
250 Wat Mongoose	130	2.725	2.851
400 Watt Mongoose	136	2.725	2.851

KENTUCKY POWER COMPANY
Comparison of Current and Proposed Rates
Two Year Fuel Review
Case No.: 2019-00002

TARIFF	Tariff Code(s)	Current Base Fuel Rate x kWh in Sheet 15- 2 c/kWh	New Base Fuel Rate x kWh in Sheet 15-2 c/kWh
SL			
<u>Overhead Service on Existing Distribution Poles</u>			
	528		
High Pressure Sodium			
		2.725	2.851
		2.725	2.851
		2.725	2.851
		2.725	2.851
<u>Service on New Wood Distribution Poles</u>			
	528		
High Pressure Sodium			
		2.725	2.851
		2.725	2.851
		2.725	2.851
		2.725	2.851
<u>Service on New Metal or Concrete Poles</u>			
	528		
High Pressure Sodium			
		2.725	2.851
		2.725	2.851
		2.725	2.851
		2.725	2.851

Kentucky Power company
KPSC Case No. 2019-00002
Commission Staff's First Set of Data Requests
Dated February 11, 2019

DATA REQUEST

KPSC_27 Provide a copy of the current tariff showing by cross-outs and inserts all proposed changes in rates.

RESPONSE

Please see attachment KPSC_R_KPCO_1_26_Attachment1 which provides a comparison of the Company's current rates based upon the current base fuel cost of 2.725 cents per kWh and the new proposed rates based upon the proposed base fuel cost of 2.851 cents per kWh for each customer class. Kentucky Power misinterpreted this request. The requested tariff pages (other than Sheet 5-1 and 5-2) have not been prepared. Kentucky Power will supplement this response when the sheets are prepared. Kentucky Power anticipates filing the supplemental response on or before March 1, 2019.

KPCO_R_KPSC_1_27_Attachment1.pdf provides the Company's tariff pages 5-1 and 5-2 for the proposed change in the base fuel cost rate.

Witness: Ranie K. Wohnhas

KENTUCKY POWER COMPANY

P.S.C. KY. NO. 11 ~~1ST REVISED ORIGINAL~~

SHEET NO. 5-1 CANCELLING P.S.C. KY. NO. ~~1110~~

ORIGINAL SHEET NO. 5-1

**TARIFF F.A.C.
(Fuel Adjustment Clause)**

APPLICABLE.

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

RATE.

1. The fuel clause shall provide for periodic adjustment per kwh of sales equal to the difference between the fuel costs per kwh of sales in the base period and in the current period according to the following formula:

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

Where F is the expense of fossil fuel in the base (b) and current (m) periods; and S is sales in the base (b) and current (m) periods, all as defined below:

2. F(b)/S(b) shall be so determined that on the effective date of the Commission's approval of the utility's application of the formula, the resultant adjustment will be equal to zero (0).
3. Fuel costs (F) shall be the most recent actual monthly cost of:
 - a. Fossil fuel consumed in the utility's own plants, and the utility's share of fossil and nuclear fuel consumed in jointly owned or leased plants, plus the cost of fuel which would have been used in plants suffering forced generation or transmission outages, but less the cost of the fuel related substitute generation, plus
 - b. The actual identifiable fossil and nuclear fuel costs [if not known--the month used to calculate fuel (F), shall be deemed to be the same as the actual unit cost of the Company generation in the month said calculations are made. When actual costs become known, the difference, if any, between fuel costs (F) as calculated using such actual unit costs and the fuel costs (F) used in that month shall be accounted for in the current month's calculation of fuel costs (F)] associated with energy purchased for reasons other than identified in paragraph (c) below, but excluding the cost of fuel related to purchases to substitute the forced outages, plus
 - c. The net energy cost of energy purchases, exclusive of capacity or demand charges (irrespective of the designation assigned to such transaction) when such energy is purchased on an economic dispatch basis. Included therein may be such costs as the charges for economy energy purchases and the charges as a result of scheduled outage, all such kinds of energy being purchased by the Company to substitute for its own higher cost energy; and less
 - d. The cost of fossil fuel recovered through intersystem sales including the fuel costs related to economy energy sales and other energy sold on an economic dispatch basis.
 - e. The fuel-related costs charged to the Company by PJM Interconnection LLC including but not limited to those costs identified in the following Billing Line Items, as may amended from time to time by PJM Interconnection LLC: Billing Line Items 1210, 2210, 1215, 1218, 2217, 2218, 1230, 1250, 1260, 2260, 1370, 2370, 1375, 2375, 1400, 1410, 1420, 1430, 1478, 1340, 2340, 1460, 1350, 2350, 1360, 2360, 1470, 1377, 2377, 1480, 1378, 2378, 1490, 1500, 2420, 2220, 1200, 1205, 1220, 1225, 2500, 2510, 1930, 2211, 2215, 2415 and 2930.
 - f. All fuel costs shall be based on weighted average inventory costing.

(Cont'd on Sheet No. 5-2)

DATE OF ISSUE: ~~XXXX~~February

DATE EFFECTIVE: Service Rendered On And After ~~XXXX~~January XX-

ISSUED BY: /s/ Ranie K. Wohnhas

TITLE: Managing Director, Regulatory & Finance

By Authority Of an Order of the Public Service Commission

In Case No. ~~2017~~2019-00002179 Dated ~~XXXX~~

TARIFF F.A.C. (Cont'd)
(Fuel Adjustment Clause)

- 4. Forced outages are all nonscheduled losses of generation or transmission which require substitute power for a continuous period in excess of six (6) hours. Where forced outages are not as a result of faulty equipment, faulty manufacturer, faulty design, faulty installations, faulty operation, or faulty maintenance, but are Acts of God, riot, insurrection or acts of the public enemy, then the utility may, upon proper showing, with the approval of the Commission, include the fuel costs of substitute energy in the adjustment. Until such approval is obtained, in making the calculations of fuel costs (F) in subsection (3)(a) and (b) above, the forced outage costs to be subtracted shall be no less than the fuel cost related to the lost generation.
- 5. Sales (S) shall be all kwh's sold, excluding intersystem sales. Where, for any reason billed system sales cannot be coordinated with the fuel costs for the billing period, sales may be equated to the sum of (i) generation, (ii) purchases, (iii) interchange in, less (iv) energy associated with pumped storage operations, less (v) intersystem sales referred to in subsection (3)(d) above, less (vi) total system loss. Utility used energy shall not be excluded in the determination of sales (S).
- 6. The cost of fossil fuel shall include no items other than the invoice price of fuel less any cash or other discounts. The invoice price of fuel includes the cost of the fuel itself and necessary charges for transportation of the fuel from the point of acquisition to the unloading point, as listed in Account 151 of FERC Uniform System of Accounts or Public Utilities and Licensees.
- 7. At the time the fuel clause is initially filed, the utility shall submit copies of each fossil fuel purchase contract not otherwise on file with the Commission and all other agreements, options or similar such documents, and all amendments and modifications thereof related to the procurement of fuel supply and purchased power. Incorporation by reference is permissible. Any changes in the documents, including price escalations, or any new agreements entered into after the initial submission, shall be submitted at the time they are entered into. Where fuel is purchased from utility-owned or controlled sources, or the contract contains a price escalation clause, those facts shall be noted and the utility shall explain and justify them in writing. Fuel charges, which are unreasonable, shall be disallowed and may result in the suspension of the fuel adjustment clause. The Commission on its own motion may investigate any aspect of fuel purchasing activities covered by this regulation.
- 8. Any tariff filing which contains a fuel clause shall conform that clause with this regulation within three (3) months of the effective date of this regulation. The tariff filing shall contain a description of the fuel clause with detailed cost support.
- 9. The monthly fuel adjustment shall be filed with the Commission ten (10) days before it is scheduled to go into effect, along with all the necessary supporting data to justify the amount of the adjustments, which shall include data, and information as may be required by the Commission.
- 10. Copies of all documents required to be filed with the Commission under this regulation shall be open and made available for public inspection at the office of the Public Service Commission pursuant to the provisions of KRS61.870 to 61.884.
- 11. At six (6) month intervals, the Commission will conduct public hearings on a utility's past fuel adjustments. The Commission will order a utility to charge off and amortize, by means of a temporary decrease of rates, any adjustment it finds unjustified due to improper calculation or application of the charges or improper fuel procurement practice.
- 12. Every two (2) years following the initial effective date of each utility fuel clause, the Commission in a public hearing will review and evaluate past operations of the clause, disallow improper expenses, and to the extent appropriate, reestablish the fuel clause charge in accordance with Subsection 2.
- 13. Resulting cost per kilowatt-hour in October 2014 to be used as the base cost in Standard Fuel Adjustment Clause is:

Fuel - ~~October-April 2017~~2014 ÷ \$~~12,504,307~~11,814,526 = \$0.0~~2851~~2725/kwh
 Sales ~~April 2017~~October-2014 458,919,000414,368,000

This, as used in the Fuel Adjustment Clause, is 2.851725¢ per kilowatt-hour.

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DATE OF ISSUE: ~~XXXX~~February

DATE EFFECTIVE: Service Rendered On And After ~~XXXX~~January XX-

ISSUED BY: /s/ Ranie K. Wohnhas

TITLE: Managing Director, Regulatory & Finance

By Authority Of an Order of the Public Service Commission

In Case No. ~~2017~~2019-00002179 Dated ~~XXXX~~

Kentucky Power company
 KPSC Case No. 2019-00002
 Commission Staff's First Set of Data Requests
 Dated February 11, 2019

DATA REQUEST

KPSC_28 For the years ending October 31 , 2017, and October 31, 2018, provide:

- a. Maximum annual system demand; and
- b. Average annual demand.

RESPONSE

a & b. Please see the below table for the requested information.

Year Ending October 2017			Year Ending October 2018		
Year	Month	Peak Demand	Year	Month	Peak Demand
2016	11	1,030	2017	11	982
2016	12	1,160	2017	12	1,217
2017	1	1,214	2018	1	1,446
2017	2	1,131	2018	2	1,173
2017	3	1,173	2018	3	1,007
2017	4	806	2018	4	905
2017	5	870	2018	5	898
2017	6	909	2018	6	999
2017	7	1,006	2018	7	985
2017	8	971	2018	8	983
2017	9	861	2018	9	990
2017	10	878	2018	10	889
Maximum		1,214			1,446
Average		1,001			1,039

Witness: Ranie K. Wohnhas

Kentucky Power company
KPSC Case No. 2019-00002
Commission Staff's First Set of Data Requests
Dated February 11, 2019

DATA REQUEST

KPSC_29

- a. Provide a schedule of the calculation of the 12-month average line loss by month for November 2016 through October 2018.
- b. Describe the actions that Kentucky Power has taken to reduce line loss during this period.

RESPONSE

a. Please see KPCO_R_KPSC_1_29_Attachment1.pdf

b. The Company works to reduce line losses by increasing conductor size, installing more efficient transformers, employing a reactive energy corrective program, and increasing the operating voltage levels of transmission and distribution lines. These actions reduce losses at constant load and help limit losses for additional load.

Witness: Ranie K. Wohnhas

Month	Year		Total Energy Disposed	Assoc. Company Interchange	System Sales for Resale	Internal Energy Disposed	Energy Lost & Unaccounted	% Line Loss Internal
1	2		3	4	5	6=(3-4-5)	7	(7/6)
NOVEMBER	16	current month	778,179	-	290,077	488,102	15,853	3.248%
		12 mos. ending	7,364,460	-	1,196,841	6,167,619	277,977	4.507%
DECEMBER	16	current month	747,387	-	149,321	598,066	49,218	8.230%
		12 mos. ending	7,570,051	-	1,330,425	6,239,626	288,202	4.619%
JANUARY	17	current month	626,193	-	47,801	578,392	52,367	9.054%
		12 mos. ending	7,492,325	-	1,357,141	6,135,184	317,843	5.181%
FEBRUARY	17	current month	514,931	-	28,537	486,394	35,656	7.331%
		12 mos. ending	7,394,123	-	1,352,585	6,041,538	316,863	5.245%
MARCH	17	current month	562,884	-	41,643	521,241	(21,183)	-4.064%
		12 mos. ending	7,422,777	-	1,353,795	6,068,982	273,705	4.510%
APRIL	17	current month	457,600	-	20,942	436,658	37,435	8.573%
		12 mos. ending	7,403,542	-	1,348,287	6,055,255	315,711	5.214%
MAY	17	current month	540,859	-	91,850	449,009	(5,922)	-1.319%
		12 mos. ending	7,442,131	-	1,392,803	6,049,328	302,015	4.993%
JUNE	17	current month	615,194	-	144,831	470,363	33,012	7.018%
		12 mos. ending	7,398,375	-	1,368,471	6,029,904	292,549	4.852%
JULY	17	current month	755,298	-	237,106	518,192	11,212	2.164%
		12 mos. ending	7,392,990	-	1,375,211	6,017,779	269,798	4.483%
AUGUST	17	current month	675,416	-	179,077	496,339	17,702	3.567%
		12 mos. ending	7,306,828	-	1,350,193	5,956,635	267,858	4.497%
SEPTEMBER	17	current month	551,009	-	120,195	430,814	17,879	4.150%
		12 mos. ending	7,334,121	-	1,426,698	5,907,423	239,898	4.061%
OCTOBER	17	current month	726,306	-	292,672	433,634	8,522	1.965%
		12 mos. ending	7,551,256	-	1,644,051	5,907,205	251,751	4.262%
NOVEMBER	17	current month	612,305	-	125,046	487,259	9,756	2.002%
		12 mos. ending	7,385,382	-	1,479,020	5,906,362	245,654	4.159%
DECEMBER	17	current month	740,765	-	135,893	604,872	42,730	7.064%
		12 mos. ending	7,378,760	-	1,465,592	5,913,168	239,166	4.045%
JANUARY	18	current month	799,003	-	105,668	693,335	60,810	8.771%
		12 mos. ending	7,551,570	-	1,523,458	6,028,112	247,609	4.108%
FEBRUARY	18	current month	518,088	-	27,765	490,323	495	0.101%
		12 mos. ending	7,554,727	-	1,522,687	6,032,040	212,448	3.522%
MARCH	18	current month	549,978	-	14,806	535,172	(10,633)	-1.987%
		12 mos. ending	7,541,821	-	1,495,849	6,045,972	222,998	3.688%
APRIL	18	current month	471,248	-	16,056	455,192	26,834	5.895%
		12 mos. ending	7,555,469	-	1,490,963	6,064,506	212,397	3.502%
MAY	18	current month	561,646	-	85,361	476,285	(10,088)	-2.118%
		12 mos. ending	7,576,256	-	1,484,474	6,091,782	208,231	3.418%
JUNE	18	current month	550,200	-	59,275	490,925	38,408	7.824%
		12 mos. ending	7,511,262	-	1,398,919	6,112,343	213,627	3.495%
JULY	18	current month	688,026	-	165,780	522,246	30,091	5.762%
		12 mos. ending	7,443,990	-	1,327,593	6,116,397	232,506	3.801%
AUGUST	18	current month	710,331	-	194,528	515,803	14,895	2.888%
		12 mos. ending	7,478,905	-	1,343,045	6,135,860	229,699	3.744%
SEPTEMBER	18	current month	579,469	-	103,819	475,650	38,811	8.160%
		12 mos. ending	7,507,365	-	1,326,669	6,180,696	250,631	4.055%
OCTOBER	18	current month	561,891	-	98,766	463,125	543	0.117%
		12 mos. ending	7,342,950	-	1,132,764	6,210,186	242,652	3.907%

Kentucky Power company
KPSC Case No. 2019-00002
Commission Staff's First Set of Data Requests
Dated February 11, 2019

DATA REQUEST

KPSC_30 Provide the most recent projected fuel requirements for the years 2019 and 2020 in tons for coal, MMBtu for natural gas, and dollars.

RESPONSE

- 1) Please see KPCO_R_KPSC_1_30_Redacted_Attachment1.xls for the 2019 and 2020 forecast in tons and dollar for coal; and
- 2) Please see KPCO_R_KPSC_1_30_Redacted_Attachment2.xls for the 2019 and 2020 forecast in MMBTUs and dollars for natural gas.

Witness: Clinton M. Stutler
 Amy E. Jeffries

Mitchell Coal Consumption, Kentucky Power Portion

	Total Tons (000)	Total Dollars (\$000)
Jan-19		
Feb-19		
Mar-19		
Apr-19		
May-19		
Jun-19		
Jul-19		
Aug-19		
Sep-19		
Oct-19		
Nov-19		
Dec-19		
Jan-20		
Feb-20		
Mar-20		
Apr-20		
May-20		
Jun-20		
Jul-20		
Aug-20		
Sep-20		
Oct-20		
Nov-20		
Dec-20		

Big Sandy Natural Gas Consumption
Total Total Dollars
(000 MMBTUs) (\$000)

	Total (000 MMBTUs)	Total Dollars (\$000)
Jan-19		
Feb-19		
Mar-19		
Apr-19		
May-19		
Jun-19		
Jul-19		
Aug-19		
Sep-19		
Oct-19		
Nov-19		
Dec-19		
Jan-20		
Feb-20		
Mar-20		
Apr-20		
May-20		
Jun-20		
Jul-20		
Aug-20		
Sep-20		
Oct-20		
Nov-20		
Dec-20		

Kentucky Power company
KPSC Case No. 2019-00002
Commission Staff's First Set of Data Requests
Dated February 11, 2019

DATA REQUEST

KPSC_31 Provide the most recent sales projections for the years 2019 and 2020 in kWh and dollars.

RESPONSE

KPCO_R_KPSC_1_31_Redacted_Attachment _1.pdf provides projected energy sales and revenues by sector for Kentucky Power Company for 2019 and 2020.

Witness: Ranie K. Wohnhas

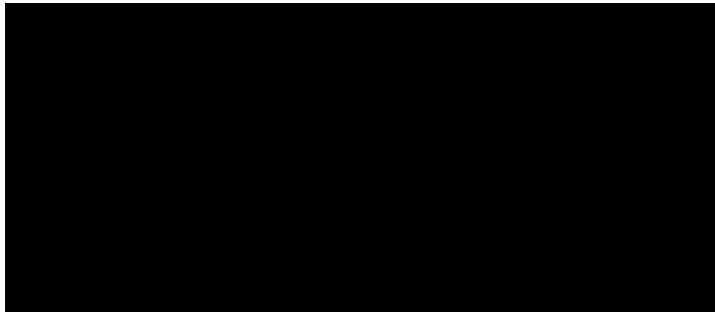
**Kentucky Power Company
Forecast Energy Sales (kWh) and Revenues (\$)**

Energy Sales (kWh)	2019	2020
Residential	2,011,015,101	1,983,676,509
Commercial	1,257,693,235	1,252,958,683
Industrial	2,443,219,030	2,460,428,915
Other Retail	10,420,380	10,414,571
Total Retail	5,722,349,765	5,707,480,698
FERC Municipals	82,587,886	82,334,876
Total Sales	5,804,937,651	5,789,815,574

Revenues (\$)

Residential
Commercial
Industrial
Other Retail
Total Retail

FERC Municipals
Total Sales



Kentucky Power company
KPSC Case No. 2019-00002
Commission Staff's First Set of Data Requests
Dated February 11, 2019

DATA REQUEST

KPSC_32 Provide the planned maintenance schedule for each of the generating units for the years 2019 and 2020.

RESPONSE

Please refer to KPCO_R_KPSC_1_32_Redacted_Attachment 1.pdf for the requested information.

Witness: Douglas J. Rosenberger
 David L. Mell

Kentucky Power Company
Fuel Adjustment Case No. 2019-00002
Generating Unit Planned Maintenance Outages
2019 and 2020

<u>2019</u>	<u>Start Date</u>	<u>End Date</u>
Big Sandy 1		
Mitchel 1		
Mitchel 2		

<u>2020</u>	<u>Start Date</u>	<u>End Date</u>
Big Sandy 1		
Big Sandy 1		
Mitchel 1		
Mitchel 2		

Kentucky Power company
KPSC Case No. 2019-00002
Commission Staff's First Set of Data Requests
Dated February 11, 2019

DATA REQUEST

KPSC_33 Identify any issues that could affect fuel costs for the two-year period that remain unresolved or unsettled. Include in the response any issues related to billings from a regional transmission operator. Consider this a continuing request to inform the Commission if Kentucky Power becomes aware of any issues during the course of this proceeding.

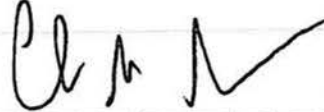
RESPONSE

The Company does not have any issues related to fuel costs that remain unresolved. The Company does not have any issues related to billings from a regional transmission operator.

Witness: Ranie K. Wohnhas

VERIFICATION

The undersigned, Clinton M. Stutler, being duly sworn, deposes and says he is the Natural Gas & Fuel Oil Manager for American Electric Power, that he has personal knowledge of the matters set forth in the foregoing responses and the information contained therein is true and correct to the best of his information, knowledge, and belief.



Clinton M. Stutler

State of Ohio

)

County of Franklin

)

Case No. 2019-00002

Subscribed and sworn before me, a Notary Public, by Clinton M. Stutler this 21 day of February, 2019.



Notary Public

My Commission Expires 07-01-2021



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

VERIFICATION

The undersigned, Ranie K. Wohnhas, being duly sworn, deposes and says he is the Managing Director of Regulatory & Finance for Kentucky Power, that he has personal knowledge of the matters set forth in the foregoing responses and the information contained therein is true and correct to the best of his information, knowledge, and belief.


Ranie K. Wohnhas

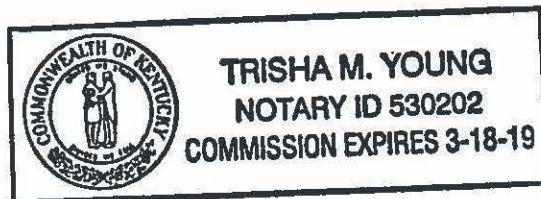
Commonwealth of Kentucky)
)
County of Boyd)

Case No. 2019-00002

Subscribed and sworn before me, a Notary Public, by Ranie K. Wohnhas this 21 day of February, 2019.


Notary Public

My Commission Expires 3-18-19



VERIFICATION

The undersigned, Douglas J. Rosenberger, being duly sworn, deposes and says he is the Plant Manager – Mitchell for Kentucky Power Company, that he has personal knowledge of the matters set forth in the foregoing responses and the information contained therein is true and correct to the best of his information, knowledge, and belief.

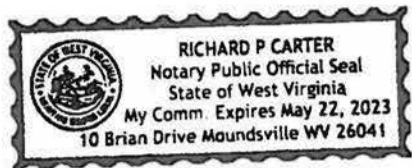
Douglas J. Rosenberger
Douglas J. Rosenberger

State of West Virginia)
)
County of Marshall) Case No. 2019-00002

Subscribed and sworn before me, a Notary Public, by Douglas J. Rosenberger this
20 day of February, 2019.

Richard P. Carter
Notary Public

My Commission Expires MAY 22, 2023



VERIFICATION

The undersigned, David L. Mell, being duly sworn, deposes and says he is Energy Production Superintendent – Big Sandy for Kentucky Power Company, that he has personal knowledge of the matters set forth in the foregoing responses and the information contained therein is true and correct to the best of his information, knowledge, and belief.

David L. Mell

David L. Mell

Commonwealth of Kentucky)
)
County of Boyd)

Case No. 2019-00002

Subscribed and sworn before me, a Notary Public, by David L. Mell this
25th day of February, 2019.

Deana K. Trasher

Notary Public

My Commission Expires 03-21-21

