Kentucky Power Company
KPSC Case No. 2021-00053
Commission Staff's Second Set of Data Requests
Dated April 5, 2021

DATA REQUEST

2-1 Refer to the Direct Testimony of Brian K. West (West Testimony). Provide the information in Table 1 and Table 2 in Excel spreadsheet format with all formulas, columns, and rows unprotected and fully accessible.

RESPONSE

See KPCO_R_KPSC_2_1_Attachment1 for the requested information.

Witness: Brian K. West

DATA REQUEST

2-2 Refer to West Testimony, page 7, Table 2.
a. Provide the monthly projections for both the projected fuel costs and the projected kWh sales for 2021 and 2022. If not included in the response, include the months of November 2020–December 2020.
b. Explain how the projected fuel costs are derived.
c. Explain how the projected kWh sales are derived. Include in the explanation whether the projections are weather normalized.
d. Explain whether in calendar year 2020, fuel costs and kWh sales declined from 2019 levels. If so, explain what factors are driving the decline in fuel costs and kWh sales.
e. Explain what factors are driving the projected decline in 2022 from 2021 levels in both fuel costs and kWh sales.
f. Provide a table and explanation that compares and contrasts the proposed base fuel rate of $0.02612 per kWh to the monthly fuels costs for 2020, 2021, and 2022.

RESPONSE

a. KPCO_R_KPSC_2_2_Attachment1 provides forecast monthly fuel costs and projected kWh sales for November 2020 through December 2022.

b. See KPCO_R_KPSC_2_2_Attachment2 for the requested information.

c. KPCO_R_KPSC_2_2_Attachment3 provides a brief description of the Company's Load Forecast process. The Load Forecast uses normalized weather.

d. KPCO_R_KPSC_2_2_Attachment4 provides the Company's actual and weather normal energy for 2019 and 2020. The Company saw a significant decline in internal energy requirements in 2020. This was largely induced by economic impacts associated with the COVID-19 Pandemic. The Kentucky Power service area also suffers from declining population and residential customer base, and some plant closures.

e. The projected decline in kWh sales results principally from declining population and residential customer bases.

f. See KPCO_R_KPSC_2_2_Attachment5 for the requested information. Kentucky Power's proposed base fuel rate of 2.612 cents per kWh is near the midpoint (2.59522 cents per kWh) between the projected 2021 fuel rate (2.63305 cents per kWh) and the projected 2022 projected fuel rate (2.55739 cents per kWh). The proposed base fuel rate of 2.612 cents per kWh is approximately 9.5 percent greater than the 2020 historical fuel cost but exceeds the 2020-2022 average rate by only 2.3 percent (0.059 cents per kWh). Please see the direct testimony of Brian K. West at pages 4-9 for additional support for the Company's choice of 2.612 cents per kWh for the proposed base fuel rate.

Witness: Brian K. West

Kentucky Power Company
Forecast Internal Energy Requirements (MWh)

Year	Month	Energy Requirements
2020	11	452,575
2020	12	533,185
2021	1	601,183
2021	2	509,112
2021	3	482,570
2021	4	407,261
2021	5	410,701
2021	6	440,537
2021	7	486,790
2021	8	464,608
2021	9	407,002
2021	10	401,694
2021	11	447,715
2021	12	528,923
2021 Annual Total		5,588,097
2022	1	596,536
2022	2	505,178
2022	3	478,999
2022	4	403,983
2022	5	409,663
2022	6	438,462
2022	7	483,534
2022	8	463,262
2022	9	405,055
2022	10	399,676
2022	11	444,892
2022	12	524,386
2022 Annual Total		5,553,625

Overview

The preparation of Kentucky Power Company's (the Company) Net Energy Cost (NEC) forecast requires a projection of the Company's internal load requirement. The internal load projection was developed by the AEPSC Economic Forecasting Department in conjunction with various groups across the AEP System. The AEP Resource Planning Departments developed the generation and off-system sales forecast.

The internal load forecast reflects an analysis of the economy and the unique factors that influence individual customers or customer classes that the Company serves. A forecast of generation (net energy output) from the Company's generating units and purchased power was developed for the Forecast Period to meet the Company's total system load obligations. The Company's generating units are operated along with the units of the other PJM members, to meet the total PJM load requirements on the most economical basis, based on price offers, subject to transmission limitations. Such operation was simulated in the development of the generation forecast by means of the PLEXOS® simulation model, a production costing computer program developed by Energy Exemplar. The generation forecast is prepared considering the impact of the projected fuel deliveries forecast, planned maintenance and other outages, random forced outages and any forecasted energy purchases.

Cost of Fuel Consumed

The cost of fuel consumed is based on the generation forecast and projected fuel deliveries for each of the Company's generating units.

Specifically, the cost of coal consumed for each of the Company's generating units is equal to the tons of coal consumed times the average unit cost of coal in fuel inventory. Since the cost of fuel consumed is developed on a monthly basis, the average cost of coal is defined as the weighted average cost of coal in inventory at the beginning of the month plus the projected fuel deliveries during the month. The tons of coal consumed are computed by *PLEXOS*®.

The cost of fuel consumed for the gas plants is also computed by *PLEXOS*®. The cost of gas consumed is based on the generation forecast and projected gas for each of the Company's gas units. The output of the gas units is multiplied by the expected price of natural gas.

Purchased Power

The Company's purchased power forecast includes costs associated with planned purchases under long term agreements and market purchases. In this forecast, the planned purchases are for energy purchased from AEP Generating Company (AEG) and Ohio Valley Electric Corporation (OVEC). The AEG Purchases represent the Company's purchase of 387 MW (30%) of the power and energy from AEG's share of Rockport Units 1 & 2 according to the Unit Power Agreement between the Company and AEG. The OVEC Purchases reflect the Company's share of the anticipated OVEC generation and associated costs according to the contractual agreement with OVEC. Market purchases are the Company's energy purchases from the PJM market it occasionally makes from non-affiliated suppliers to meet its total load. Other PJM Billing Line Items (BLI) includes the financial settlement of PJM LSE (load serving entity) transmission losses, financial transmission rights (FTR) revenues, PJM Implicit Congestion Charges, and certain PJM Ancillary Charges.

Generation for Sales

The Company's Generation for Sales represent Purchases for Off-System Sales which are the portions of OVEC Purchases and Other System Purchases that are assigned to the Company's energy sales into the PJM market.

Two distinct methods are used for forecasting kWh. Both methods are statistically based, but use different time horizons and inputs. The results of both methods are used as inputs to forecast kW demand.

First, regression models with time series error terms were used to forecast kWh sales up to 18 months ahead (short-term). These models use the most recent customer count, kWh sales data, weather data (in the form of degree days), trend variable and indicator (dummy) variables where needed. These models use the latest available sales and weather information to represent the variation in kWh sales on a monthly basis, and produce forecasts in the short run.

The long-term process starts with an economic forecast provided by Moody's Analytics for the United States as a whole, each state, and regions within each state. These forecasts include forecasts of employment, population, income, gross regional product and other variables. The long-term kWh forecast for residential and commercial kWh uses statistically adjusted end-use (SAE) models that combine end-use and economic characteristics to produce a forecast of monthly kWh sales. The long-term kWh forecast for the other revenue classes uses econometric models incorporating the economic forecast. Inputs such as regional and national economic and demographic conditions, energy prices, appliance saturations, efficiency trends and programs, weather data, and customer-specific information are all utilized in producing the forecasts. These models explicitly tie electricity consumption to economic, efficiency, and demographic factors at least 10 years into the future. Post model adjustments are made to the retail energy forecast to reflect the effects of company sponsored DSM programs.

To forecast peak, revenue class sales is combined with class level and end-use level load shapes. These shapes are modeled and simulated with actual and forecast temperatures to provide hourly load shapes by revenue class and end-use. Each of the end-use shapes is aggregated to form an overall system shape. The system shape is evaluated against historic peaks and load factors and adjusted if necessary.

Kentucky Power Company
Actual and Weather Normal
Internal Energy Requirements (MWh)

Year	Month	Actual Energy Requirements	Normal Energy Requirements
2019	1	628,525	633,728
2019	2	497,617	539,977
2019	3	536,363	517,863
2019	4	435,650	448,882
2019	5	457,915	442,910
2019	6	476,855	486,507
2019	7	535,222	522,148
2019	8	519,649	517,290
2019	9	488,020	444,626
2019	10	449,405	454,778
2019	11	517,039	478,597
2019	12	549,190	587,110
2019 Annual Total		6,091,449	6,074,416
2020	1	550,760	610,666
2020	2	517,658	532,745
2020	3	451,475	501,397
2020	4	395,598	393,826
2020	5	421,920	401,786
2020	6	433,846	437,131
2020	7	517,600	485,571
2020	8	486,714	483,058
2020	9	420,974	423,236
2020	10	384,679	397,300
2020	11	431,272	463,782
2020	12	563,951	555,921
2020 Annual Total		5,576,448	5,686,419

Kentucky Power Company
KPSC Case No. 2021-00053
Commission Staff's Second Set of Data Requests
Dated April 5, 2021

DATA REQUEST

2-3 Refer to the Direct Testimony of Clinton M. Stutler (Stutler Testimony), page 9, lines 1–6. Explain whether and how extreme and prolonged cold temperatures, as recently experienced in Texas, would likely impact the natural gas market from which Kentucky Power procures its supply. Explain how Kentucky Power's natural gas procurement strategy would minimize the impact if such extreme weather were to occur in Kentucky.

RESPONSE

The cold temperatures during the February 2021 winter storm in southern states such as Texas, Oklahoma, Louisiana and Arkansas caused water and other liquids used in the natural gas production process to freeze in gathering lines or at wellheads. This freezing interrupted gas supply during a period of extreme demand, which in turn caused publicly reported natural gas prices to settle at record levels.

Kentucky Power purchases natural gas for Big Sandy Unit 1 on the spot market. Because natural gas is consumed as it is delivered, a sudden disruption in supply, whether weather related or otherwise, can affect the spot market price of natural gas. If conditions prevent natural gas from being produced or made available for consumers, prices would increase and the curtailment of Big Sandy Unit 1 could be required.

The only absolute method of mitigating risk is on-site storage or the ability to use an alternative fuel to ensure that fuel is available when needed.

Witness: Clinton M. Stutler

Kentucky Power Company
KPSC Case No. 2021-00053
Commission Staff's Second Set of Data Requests
Dated April 5, 2021

DATA REQUEST

2-4 Refer to the Stutler Testimony, page 9, lines 1–6. Explain whether Kentucky Power anticipates any changes in the natural gas market beyond the two-year period that could affect Kentucky Power's procurement strategy or practices.

RESPONSE

There is no indication of significant change in the natural gas market beyond the two-year period that would affect Kentucky Power's procurement strategy or practices.

Witness: Clinton M. Stutler

Kentucky Power Company
KPSC Case No. 2021-00053
Commission Staff's Second Set of Data Requests
Dated April 5, 2021

DATA REQUEST

2-5 Refer to the Direct Testimony of Jeffrey C. Dial (Dial Testimony), pages 6– 7, and page 10, lines 4–12. Explain whether Kentucky Power would continue to do business with the owners of the Ember and SNR companies if they were to form new companies and submit bids to Kentucky Power. If so, explain Kentucky Power's due diligence methods that allow the company to do business with companies whose owners have proven unreliable in the past.

RESPONSE

With the number of Central Appalachian coal producers continuing to shrink over time, it is important for Kentucky Power to maintain a diversified supply of producers with the ability to supply low sulfur Central Appalachian coal. Past performance is considered by the Company prior to entering into any new agreements. Prior to entering any new business, as with any counterparty, AEP's Credit department performs a thorough analysis of a company's financial statements and structure to determine if this new entity would be able to meet its obligations. Additionally, AEP's Fuel Field coordinators visit the supply source to determine the type of infrastructure already in place and the status of the mine (active or inactive). Mine plans are reviewed to determine if the mine is capable of supplying the amount of coal offered in relation to other contractual obligations. After conducting the appropriate due diligence, should any new contractual agreement be entered into, the agreement would include specific performance and shortfall damage language to ensure compliance with the terms and conditions of such agreement.

Witness: Jeffrey C. Dial

Kentucky Power Company
KPSC Case No. 2021-00053
Commission Staff's Second Set of Data Requests
Dated April 5, 2021

DATA REQUEST

2-6 Refer to the Dial Testimony, page 7, lines 12–18.
a. For each of the years 2018–2020, provide a table showing the annual obligation, the total annual amount taken, the total annual amount taken that is attributable to previously deferred amounts (and the year from which the amount was deferred), and the total amount taken attributable to the then current year's obligation.

b. Explain how many years forward Kentucky Power can defer portions of its annual obligation each year and whether Kentucky Power eventually will have to take the deferred amounts.

RESPONSE

a. See KPCO_R_KPSC_2_6_Attachment1 for the requested information..

b. For Contract Years 2018-2022, AEPSC, acting on behalf of Kentucky Power Company and Appalachian Power Company, has the right to defer up to a maximum amount of 400,000 tons (200,000 tons for Kentucky Power's portion) into the following Contract Year. Any tonnage above 400,000 is subject to mutual agreement by the parties.

Witness: Jeffrey C. Dial

American Consolidated Natural Resources
Contractual Obligation

	2018 [2]			2019 [3]			2020 [4]		
Contract Number	**Obligation**	**Delivered**	**Shortfall**	**Obligation**	**Delivered**	**Shortfall**	**Obligation**	**Delivered**	**Shortfall**
07-77-05-900 [1 5]	1,716,878	1,142,208	574,670	1,548,973	1,548,973	-	1,025,697	548,630	477,067

Footnotes

1. Kentucky Power's portion of the tonnages would be 50% of the amounts listed
2. Quantity Obligation includes 383,878 tonnage shortfall from 2017
3. Quantity shortfall for CY 2018 was 574,670 tons. 548,973 tons (400,000 ton allowable contractual deferral plus an additional 148,973 that the parties agreed to defer) would be deferred into 2019 with the remaining 25,697 tons deferred into 2020
4. Quantity shortfall for CY 2020 was 477,067. All 477,067 tons (400,000 ton allowable contractual deferral plus an additional 77,067 tons that the parties agreed to defer) would be deferred into 2021
5. Buyer has the contractual right to defer up to 400,000 tons per year into the following year. Any additional deferral is subject to mutual agreement of the parties
6. Kentucky Power's portion of any of the deferred amounts would be 50% of the total (i.e 200,000 tons of the allowable 400,000 ton contractual deferral)

Kentucky Power Company
KPSC Case No. 2021-00053
Commission Staff's Second Set of Data Requests
Dated April 5, 2021

DATA REQUEST

2-7 Refer to the Kentucky Power's response to the Commission Staff's First Request for Information (Staff's First Request), Item 2, Attachment 1.
a. Explain the meaning and impact of subtracting 50,000 or more tons from the totals referencing footnote 2.

b. For each of the contracts listed in the Attachment, explain which allow for deferring amounts into forward years, the amounts that have been deferred into forward years and when delivery will be eventually taken.

RESPONSE

a. This footnote was inadvertently included and has no impact on the tonnage.

b. The only contract that allows for deferring tonnage is the ACNR agreement as discussed in the Company's response to KPSC 2-6. The other contract deferrals for the remaining contracts listed on Attachment 1 were by mutual agreement of the parties.

Witness: Jeffrey C. Dial

Kentucky Power Company
KPSC Case No. 2021-00053
Commission Staff's Second Set of Data Requests
Dated April 5, 2021

DATA REQUEST

2-8 Refer to the Kentucky Power's response to the Staff's First Request, Item 13. Kentucky Power is capacity short in the winter heating season and yet sells capacity to Wheeling Power Company.
a. Confirm that Kentucky Power did not make any capacity purchases, energy sales, or energy purchases from AEP East regulated companies who are members of the Power Coordination Agreement (PCA.)

b. Provide a table showing Kentucky Power's monthly generation capacity, demand, and reserve margin for June 2018–May 2020, and explain how the company is able to make the capacity sales and not fall below its required PJM reserve margin.

RESPONSE

a. Confirmed, aside from the capacity sale to PCA member Wheeling Power identified in the Company's response to question 1-13.

b. PJM does not evaluate capacity needs on a monthly basis. For the June 2018 - May 2019 planning year and the June 2019 - May 2020 planning year, Kentucky Power was able to provide enough capacity to meet its capacity obligation along with its reserve margin, 15.7% and 16.5% respectively, in those planning years.

Witness: Jason M. Stegall

Kentucky Power Company
KPSC Case No. 2021-00053
Commission Staff's Second Set of Data Requests
Dated April 5, 2021

DATA REQUEST

2-9 Refer to the Kentucky Power's response to the Staff's First Request, Item 14, Attachment 1. Highlight those transactions that are attributable to sales and purchases from AEP East regulated companies who are members of the PCA.

RESPONSE

There were not transactions for sales or purchases with AEP East Regulated companies who are members of the PCA during the period May 2020 through October 2020. There are several transactions with AEP Ohio, which is not a party to the PCA. These transactions are designated "OHPA2" in KPCO_R_KPSC_1_14_Attachment1.

Witness: Brian K. West

Kentucky Power Company
KPSC Case No. 2021-00053
Commission Staff's Second Set of Data Requests
Dated April 5, 2021

DATA REQUEST

2-10 Refer to the Kentucky Power's response to the Staff's First Request, Item 27, Attachment 1, and Item 28, Attachment 1. Provide the calculations supporting each of the rates enumerated in the tariffs.

RESPONSE

Please see KPCO_R_KPSC_2_10_attachment1 for the requested information.

Witness: Brian K. West

Kentucky Power Company
KPSC Case No. 2021-00053
Commission Staff's Second Set of Data Requests
Dated April 5, 2021

DATA REQUEST

2-11 Refer to the Kentucky Power's response to the Staff's First Request, Item 20, Attachment 1, page 1 of 2.
a. Explain why the July 2019 entry for System Sales for Resale is four times as high as the previous month and August 2019 is half of July 2019.
b. Explain why the September 2020 entry for System Sales for Resale is so low.

RESPONSE

The amount of the System Sales for Resale is affected by the availability of the generation plants and the market for the energy generated by the plant.

a. In June 2019, the generation units were offline a significant portion of the month thereby reducing unit availability for sales into the PJM market. In July 2019 the units were back in operation and thus available for sales into the PJM market. The return of the units to operation, coupled with the units being economically dispatched in July 2019, resulted in System Sales for Resale substantially exceeding the June 2019 levels. In August 2019, although there was some economic dispatch, the units principally were offered into the market as must-run and dispatched at lower levels of output, thereby reducing the amount of revenues earned by selling energy into the PJM market.

b. The reduced level of September 2020 System Sales for Resale principally was the result of Mitchell Unit 2 not running during the month.

Witness: Brian K. West

Witness: Jason M. Stegall

DATA REQUEST

2-12 Refer to the Kentucky Power's response to the Staff' First Request, Item 35.b. Provide the 2019 report that reviews the reasonableness of the Barge Transportation Agreement.

RESPONSE

Please refer to the table below for the 2019 comparison referenced in the Company's response to KPSC 1-35(b):

Mitchell Plant

2019 Barge Review

Origin	Mile Post/ River	KR/BS Miles	OR Miles	Total Miles	2019 Rates	Mills Per Ton Mile
Aquilla Dock	6.0 BS	6.0	202.0	208.0	$ 6.55	0.031490
Case Coal Dock	8.0 BS	8.0	202.0	210.0	$ 6.55	0.031190
KCT	7.5 BS	7.5	202.0	209.5	$ 6.55	0.031265
Lockwood	4.8 BS	4.8	202.0	206.8	$ 6.55	0.031673
Mammoth	84.5 KR	84.5	153.6	238.1	$ 7.37	0.030953
Marmet	69.0 KR	69.0	153.6	222.6	$ 6.13	0.027538
Quincy	73.5 KR	73.5	153.6	227.1	$ 6.13	0.026993
River Point Dock	69.0 KR	69.0	153.6	222.6	$ 7.13	0.032031
Spot Rates Per Argus Coal Transportation 3/19/19						
Big Sandy to Pittsburgh	317.0 OR		317.0	317.0	$ 8.40	0.026498
Port Amherst to Pittsburgh	64.0 KR	64.0	265.6	329.6	$ 9.08	0.027549
Spot Rates Per Argus Coal Transportation 6/4/19						
Big Sandy to Pittsburgh	317.0 OR		317.0	317.0	$ 8.38	0.026435
Port Amherst to Pittsburgh	64.0 KR	64.0	265.6	329.6	$ 8.95	0.027154
Spot Rates Per Argus Coal Transportation 9/3/19						
Big Sandy to Pittsburgh	317.0 OR		317.0	317.0	$ 8.47	0.026719
Port Amherst to Pittsburgh	64.0 KR	64.0	265.6	329.6	$ 9.05	0.027458
Spot Rates Per Argus Coal Transportation 12/3/19						
Big Sandy to Pittsburgh	317.0 OR		317.0	317.0	$ 8.47	0.026719
Port Amherst to Pittsburgh	64.0 KR	64.0	265.6	329.6	$ 8.45	0.025637

Witness: Jeffrey C. Dial

VERIFICATION

The undersigned, Brian K. West, being duly sworn, deposes and says he is Vice President, Regulatory & Finance 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.

Brian K. West

State of Indiana)
) ss Case No. 2021-00053
County of Allen)

Subscribed and sworn to before me, a Notary Public, in and for said County and State, Brian K. West this 7th day of April, 2021.

Regiana M. Sistevaris

Digitally signed by Regiana M. Sistevaris
Date: 2021.04.07 15:03:36 -04'00'

Regiana M. Sistevaris, Notary Public

My Commission Expires: January 7, 2023

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jmstegall@aep.com (Principal) (Personally Known)

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srsmithhisler@aep.com
I, S. Smithhisler, did witness the participants named above electronically sign this document.

VERIFICATION

The undersigned, Jason M. Stegall, being duly sworn, deposes and says he is the Regulated Pricing & Analysis Manager for American Electric Power Service Corporation, 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.

Signed on 2021/04/12 12:26:09 -8:00

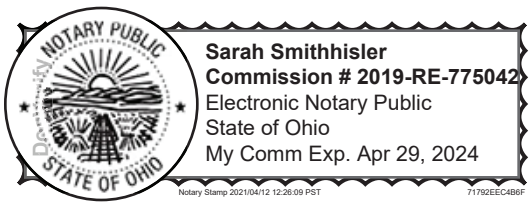
Jason M. Stegall

State of Ohio)
) Case No. 2021-00053
County of Franklin)

Subscribed and sworn before me, a Notary Public, by Jason M. Stegall this 12th day of April, 2021.

Signed on 2021/04/12 12:26:09 -8:00

Notary Public



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E-Signature Summary

E-Signature 1: Jeffrey C. Dial (JCD)
April 12, 2021 16:10:14 -8:00 [4D18A246C660] [161.235.2.87]
jcdial@aep.com (Principal) (Personally Known)

E-Signature Notary: S. Smithhisler (SRS)
April 12, 2021 16:10:14 -8:00 [F2E0B5746F4F] [167.239.221.82]
srsmithhisler@aep.com
I, S. Smithhisler, did witness the participants named above electronically sign this document.

VERIFICATION

The undersigned, Jeffrey C. Dial, being duly sworn, deposes and says he is the Director of Coal, Transportation and Reagent Procurement for American Electric Power Service Corporation, 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.

Jeffrey C. Dial
Signed on 2021/04/12 16:10:14 -8:00

Jeffrey C. Dial

State of Ohio)
)
County of Franklin)

Case No. 2021-00053

Subscribed and sworn before me, a Notary Public, by Jeffrey C. Dial this 12th day of April, 2021.

Signed on 2021/04/12 16:10:14 -8:00

Notary Public

NOTARY PUBLIC STATE OF OHIO

Sarah Smithhisler
Commission # 2019-RE-775042
Electronic Notary Public
State of Ohio
My Comm Exp. Apr 29, 2024

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E-Signature Summary

E-Signature 1: Clinton M. Stutler (CMS)
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April 13, 2021 06:40:46 -8:00 [B2AC877C6512] [167.239.221.82]
srsmithhisler@aep.com
I, S. Smithhisler, did witness the participants named above electronically sign this document.

VERIFICATION

The undersigned, Clinton M. Stutler, being duly sworn, deposes and says he is the Natural Gas & Fuel Oil Manager for American Electric Power Service Corporation, 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.

Signed on 2021/04/13 06:40:46 -8:00

Clinton M. Stutler

State of Ohio)
) Case No. 2021-00053
County of Franklin)

Subscribed and sworn before me, a Notary Public, by Clinton M. Stutler this 13th day of April, 2021.

Signed on 2021/04/13 06:40:46 -8:00

Notary Public

NOTARY PUBLIC STATE OF OHIO

Sarah Smithhisler
Commission # 2019-RE-775042
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