

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

Electronic Investigation Of The Service, Rates And)
Facilities Of Kentucky Power Company) Case No. 2021-00370

Notice of Filing Of Ten-Day Status Update

Kentucky Power Company gives notice, in accordance with ordering paragraph 7 of the Commission's September 27, 2021 Order, of its filing as part of this notice of its January 13, 2022 supplemental response to KPSC_RH_1_1 (ten-day update) in Case No. 2021-00004.

Also filed with the notice of filing are the two attachments to the January 13, 2022 ten-day update.

Respectfully submitted,



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COUNSEL FOR
KENTUCKY POWER COMPANY

Kentucky Power Company
KPSC Case No. 2021-00004
Commission Staff's Rehearing Data Requests
Dated August 19, 2021
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DATA REQUEST

RH_1_1 Explain Kentucky Power and Wheeling Power's plan regarding Mitchell. Provide updated status reports every ten days through the pendency of this proceeding.

RESPONSE

Kentucky Power and Wheeling Power currently are implementing plans to ensure the construction of the CCR project to allow the operation of the Mitchell Generating Station through December 31, 2028.

Kentucky Power Company and Wheeling Power Company are reviewing their alternatives regarding the Mitchell Generating Station in light of the July 15, 2021 decision of this Commission, and the August 4, 2021 decision of the Public Service Commission of West Virginia. No decision regarding a plan for the Mitchell Generating Station beyond that described above has been reached by either Company.

Kentucky Power will file updated status reports every ten days during the pendency of this proceeding.

September 13, 2021 Update

Wheeling Power Company and Appalachian Power Company on September 8, 2021 filed with the Public Service Commission of West Virginia their "Petition to Reopen Case and to Take Further Action" in Case No. 20-1040-E-CN. The petition requests the West Virginia Commission to provide certain confirmations, acknowledgements, and commitments regarding, *inter alia*, the Mitchell Generating Station, in light of the inconsistent orders of the Kentucky and West Virginia commissions regarding the proposed ELG work at the Mitchell Generating Station. The petition further requests that the West Virginia Commission provide the confirmations, acknowledgements, and commitments prior to the October 13, 2021 deadline under the ELG Rule for notifying the West Virginia Department of Environmental Protection concerning the ELG modifications at the Mitchell Generating Station. Finally, Wheeling Power and Appalachian Power Company indicated in the petition that there were matters in need of resolution should West Virginia decide to fully fund the ELG investment and maintain the plant in order to preserve an option to run the Mitchell Generating Station past 2028.

A copy of the petition is attached as KPCO_SR_KPSC_RH_1_1_Attachment1.

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The West Virginia commission by order dated September 9, 2021 established a procedural schedule, and provided for a September 24, 2021 evidentiary hearing, in connection with the petition.

A copy of the September 9, 2021 order is attached as KPCO_SR_KPSC_RH_1_1_Attachment2.

Kentucky Power Company and Wheeling Power Company continue to review their alternatives regarding the Mitchell Generating Station pending action by the West Virginia Commission on the petition. Kentucky Power Company also intends to explore these issues and will work to bring the Commission a recommendation on how to handle the Mitchell operating agreement in a new docket for review.

Kentucky Power will continue to file updated status reports every ten days during the pendency of this proceeding on the status of the West Virginia decision on ELG investment.

September 23, 2021 Update

Wheeling Power Company and Appalachian Power Company on September 20, 2021 filed with the Public Service Commission of West Virginia their Reply in support of their "Petition to Reopen Case and to Take Further Action."

A copy of the Reply is attached as KPCO_SR_KPSC_RH_1_1_Attachment3.

Kentucky Power Company and Wheeling Power Company continue to review their alternatives regarding the Mitchell Generating Station pending action by the West Virginia Commission on the petition. Kentucky Power Company will work to bring the Commission a recommendation on how to handle the Mitchell operating agreement either in Case No. 2021-00370 or in a separate docket.

Kentucky Power will continue to file updated status reports every ten days during the pendency of this proceeding.

October 4, 2021 Update

The Public Service Commission of West Virginia held an evidentiary hearing on September 24, 2021 in Case No. 20-1040-E-CN. The purpose of the hearing was to address the issues raised in Wheeling Power Company and Appalachian Power Company's September 8, 2021 "Petition to Reopen Case and to Take Further Action."

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Kentucky Power Company and Wheeling Power Company continue to review their alternatives regarding the Mitchell Generating Station pending action by the West Virginia Commission on the petition. Kentucky Power Company will work to bring the Commission a recommendation on how to handle the Mitchell operating agreement either in Case No. 2021-00370 or in a separate docket.

Kentucky Power will continue to file updated status reports every ten days during the pendency of this proceeding.

October 13, 2021 Update

On October 12, 2021 the Public Service Commission of West Virginia issued its Order regarding Wheeling Power Company and Appalachian Power Company's September 20, 2021 "Petition to Reopen Case and to Take Further Action" affirming the earlier order that the Companies proceed with ELG at all three plants.

Please see KPCO_SR_KPSC_RH_1_1_Attachment4 which provides a copy of the October 12, 2021 Order and all other documents filed by either Wheeling Power Company or the Public Service Commission of West Virginia in Case No. 20-1040-E-CN since October 2, 2021¹ through October 12, 2021.

Kentucky Power will continue to file updated status reports every ten days during the pendency of this proceeding.

October 25, 2021 Update

Wheeling Power Company is moving forward with CCR/ELG work at the Mitchell Generating Station given the recent action by the West Virginia Commission on the petition. Kentucky Power Company will work to bring the Commission a recommendation on how to handle the Mitchell operating agreement either in Case No. 2021-00370 or in a separate docket. The Company expects to make the operating agreement filing in fourth quarter 2021 and further plans to address through that filing that Kentucky Power will only pay for CCR-related costs associated with the CCR/ELG project.

¹ The Commission Staff's data request 2-6 dated September 17, 2021 sought, as a continuing request, that the Company provide a copy of any documents filed by Wheeling Power or the Public Service Commission of West Virginia in Case No. 20-1040-E-CN and to be provided in the Company's 10-day status reports. The Company's response to 2-6 provided these documents through October 1, 2021.

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Kentucky Power will continue to file updated status reports every ten days during the pendency of this proceeding.

There were no documents filed by either Wheeling Power Company or the Public Service Commission of West Virginia in Case No. 20-1040-E-CN from October 13, 2021 through October 24, 2021.

November 4, 2021 Update

AEP has entered into an agreement to sell its Kentucky operations, which include Kentucky Power and AEP Kentucky Transco, to Liberty Utilities Corp., the regulated utility business of parent company Algonquin Power & Utilities Corporation. Liberty will own and obtain power from Kentucky Power's 50% portion of the Mitchell Plant through 2028. The sale is expected to close in the second quarter of 2022, pending regulatory approvals. The Company expects that an application for Commission approval of the transaction will be made in the fourth quarter 2021.

Kentucky Power Company will work to bring the Commission a recommendation on how to handle the Mitchell operating agreement either in Case No. 2021-00370 or in a separate docket. The Company expects to make the operating agreement filing in the fourth quarter 2021.

Kentucky Power will continue to file updated status reports every ten days during the pendency of this proceeding.

There were no documents filed by either Wheeling Power Company or the Public Service Commission of West Virginia in Case No. 20-1040-E-CN from October 25, 2021 through November 3, 2021.

November 15, 2021 Update

On November 5, 2021, Kentucky Power filed its notice of intent to file an application for approval of affiliate agreements related to the Mitchell Generating Station. The Commission assigned this proceeding Case No. 2021-00421. The Company will file its application before November 30, 2021. A comparable filing will be made at the same time in West Virginia.

Kentucky Power will continue to file updated status reports every ten days during the pendency of this proceeding.

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There were no documents filed by either Wheeling Power Company or the Public Service Commission of West Virginia in Case No. 20-1040-E-CN from November 4, 2021 through November 14, 2021.

November 24, 2021 Update

On November 19, 2021, Kentucky Power filed its application for approval of its proposed Mitchell Plant Operations and Maintenance Agreement and Mitchell Plant Ownership Agreement (collectively the “New Mitchell Agreements”) in Case No. 2021-00421. Please see KPCO_SR_KPSC_1_1_Attachment5 for a copy of the Company’s application, including the supporting testimonies of D. Brett Mattison and Timothy C. Kerns. A comparable filing was made contemporaneously in West Virginia under Case No. 21-0810-E-PC. Please see KPCO_SR_KPSC_1_1_Attachment6 for a copy of this filing.

Additionally, American Electric Power Service Corporation (on behalf of Wheeling Power and Kentucky Power) filed the New Mitchell Agreements and cancellation of Rate Schedules No. 303 (current Mitchell Plant Operating Agreement) with FERC on November 19, 2021. Please see KPCO_SR_KPSC_1_1_Attachment7 for a copy of this filing.

Kentucky Power will continue to file updated status reports every ten days during the pendency of this proceeding.

There were no documents filed by either Wheeling Power Company or the Public Service Commission of West Virginia in Case No. 20-1040-E-CN from November 15, 2021 through November 23, 2021.

December 3, 2021 Update

On November 30, 2021 an informal meeting was held following the hearing in Case No. 2021-00370 to discuss a procedural schedule for Case No. 2021-00421. The Commission entered an Order on December 3, 2021 in Case No. 2021-00421 establishing the procedural schedule for Case No. 2021-00421.

As of December 2, 2021 a procedural schedule has not been established in the comparable filing made in West Virginia (21-0810-E-PC).

Copies of the FERC eLibrary docket for FERC Case No. ER22-453-000 (Kentucky Power Company) and FERC Case No. ER22-452-000 (Wheeling Power Company) are filed as KPCO_SR_KPSC_1_1_Attachment8 and KPCO_SR_KPSC_1_1_Attachment9 respectively.

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Kentucky Power will continue to file updated status reports every ten days during the pendency of this proceeding.

There were no documents filed by either Wheeling Power Company or the Public Service Commission of West Virginia in Case No. 20-1040-E-CN during the period November 24, 2021 through December 2, 2021.

December 13, 2021 Update

On December 13, 2021, the Commission established a hearing date in Case No. 2021-00421. The hearing is to be held on March 1, 2022 through March 3, 2022.

As of December 12, 2021 a procedural schedule has not been established in the comparable filing made in West Virginia (21-0810-E-PC).

Copies of the FERC eLibrary docket for FERC Case No. ER22-453-000 (Kentucky Power Company) and FERC Case No. ER22-452-000 (Wheeling Power Company) are filed as KPCO_SR_KPSC_1_1_Attachment10 and KPCO_SR_KPSC_1_1_Attachment11 respectively.

Kentucky Power will continue to file updated status reports every ten days during the pendency of this proceeding.

There were no documents filed by either Wheeling Power Company or the Public Service Commission of West Virginia in Case No. 20-1040-E-CN during the period December 3, 2021 through December 12, 2021.

December 22, 2021 Update

The Company will be filing its responses to the first set of discovery requests in Case No. 2021-00421 today.

As of December 21, 2021 a procedural schedule has not been established in the comparable filing made in West Virginia (21-0810-E-PC).

Copies of the FERC eLibrary docket for FERC Case No. ER22-453-000 (Kentucky Power Company) and FERC Case No. ER22-452-000 (Wheeling Power Company) are filed as KPCO_SR_KPSC_1_1_Attachment12 and KPCO_SR_KPSC_1_1_Attachment13 respectively.

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Kentucky Power will continue to file updated status reports every ten days during the pendency of this proceeding.

There were no documents filed by either Wheeling Power Company or the Public Service Commission of West Virginia in Case No. 20-1040-E-CN during the period December 13, 2021 through December 21, 2021.

January 3, 2022

There were no documents filed by either Wheeling Power Company or the Public Service Commission of West Virginia in Case No. 20-1040-E-CN during the period December 22, 2021 through December 31, 2021.

On December 22, 2021 the Staff of the Public Service Commission of West Virginia issued its initial memorandum and first set of data requests in Case No. 21-0810-E-PC. The proceeding seeks approval of the Mitchell Plant Operations and Maintenance Agreement and the Mitchell Plant Ownership Agreement. Copies of the filed memo and the data requests are attached as KPCO_SR_KPSC_1_1_Attachment14 and KPCO_SR_KPSC_1_1_Attachment15 respectively. As of December 29, 2021 a procedural schedule has not be established in Case 21-0810-E-PC.

Copies of the FERC eLibrary docket for FERC Case No. ER22-453-000 (Kentucky Power Company) and FERC Case No. ER22-452-000 (Wheeling Power Company) are filed as KPCO_SR_KPSC_1_1_Attachment16 and KPCO_SR_KPSC_1_1_Attachment17 respectively.

January 13, 2022

There were no documents filed by either Wheeling Power Company or the Public Service Commission of West Virginia in Case No. 20-1040-E-CN during the period January 1, 2022 through January 12, 2022.

Responses to the Staff of the Public Service Commission of West Virginia's first set of data requests in Case No. 21-0810-E-PC were filed on January 11, 2022. A copy of these responses is attached as KPCO_SR_KPSC_1_1_Attachment18. As of December 29, 2021 a procedural schedule has not be established in Case 21-0810-E-PC.

Copies of the FERC eLibrary docket for FERC Case No. ER22-453-000 (Kentucky Power Company) and FERC Case No. ER22-452-000 (Wheeling Power Company) are filed as KPCO_SR_KPSC_1_1_Attachment19 and KPCO_SR_KPSC_1_1_Attachment20 respectively.

Witness: Deryle B. Mattison



Keith D. Fisher
Senior Counsel

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January 11, 2022

Via Electronic Mail

Karen Buckley
Acting Executive Secretary
Public Service Commission of West Virginia
201 Brooks St.
Charleston, WV 25301

Re: Case No. 21-0810-E-PC
Appalachian Power Company and Wheeling Power Company
*Petition for Commission Consent and Approval to Enter into Ownership and
Operating Agreements for the Mitchell Plant*

Dear Ms. Buckley:

Please find enclosed for filing in the above-referenced matter the Responses of Appalachian Power Company and Wheeling Power Company to Staff's First Data Request. On this date, copies thereof were served in accordance with the Certificate of Service.

This filing is made via electronic mail in accordance with the Commission's General Order No. 262.3 *Regarding Processing of Cases During COVID-19 West Virginia State of Emergency*.

Thank you for your attention to this matter. Should you have any questions regarding this correspondence, please do not hesitate to contact me.

Sincerely,

Keith D. Fisher (WV State Bar #11346)
*Counsel for Appalachian Power Company
and Wheeling Power Company*

Enclosure

cc: Certificate of Service

**PUBLIC SERVICE COMMISSION
OF WEST VIRGINIA
CHARLESTON**

CASE NO. 21-0810-E-PC

**APPALACHIAN POWER COMPANY and
WHEELING POWER COMPANY,**
public utilities.

*Petition for Commission Consent and Approval
to Enter into Ownership and Operating Agreements
for the Mitchell Plant*

**RESPONSES OF APPALACHIAN POWER COMPANY AND
WHEELING POWER COMPANY TO STAFF'S FIRST DATA REQUEST**

Appalachian Power Company ("APCo") and Wheeling Power Company ("WPCo") (together, "the Companies") file the following as their Responses to Staff's First Data Request in the above-referenced matter:

**APPALACHIAN POWER COMPANY &
WHEELING POWER COMPANY
WEST VIRGINIA CASE NO. 21-0810-E-PC
Staff Set 1**

Request 1-1

Will the agreement to sell to liberty require changes to the proposed agreement?

Response 1-1

No. As noted in footnote 4 of the Direct testimony of Company witness Beam, Liberty Utilities Co. has agreed to and accepted the terms of the New Mitchell Agreements as part of the sale transaction.

**APPALACHIAN POWER COMPANY &
WHEELING POWER COMPANY
WEST VIRGINIA CASE NO. 21-0810-E-PC
Staff Set 1**

Request 1-2

Will the non-operator have the authority to either limit or mandate that the owner operator acquire renewable energy supplies such that the owner operator must refuse to dispatch generated energy to the owner operators customers' demands for energy?

Response 1-2

No. The non-operator (KPCo) will not have the authority to either limit or mandate that the owner operator (WPCo) acquire renewable energy supplies.

**APPALACHIAN POWER COMPANY &
WHEELING POWER COMPANY
WEST VIRGINIA CASE NO. 21-0810-E-PC
Staff Set 1**

Request 1-3

Which entity will select the technical expert AEPSC or KPCO/WPCO personnel?

Response 1-3

WPCo and KPCo have selected Burns & McDonnell as the Technical Expert in accordance with a vote by the Operating Committee.

**APPALACHIAN POWER COMPANY &
WHEELING POWER COMPANY
WEST VIRGINIA CASE NO. 21-0810-E-PC
Staff Set 1**

Request 1-4

What will be the qualifications of the new technical expert and what type of similar experience with a large plant ELG conversion will be required?

Response 1-4

The Technical Expert identified in response to Staff 1-3, Burns & McDonnell, met the definition of that term as reflected in Company Exhibit CTB-D3, Page 31 of 34, as well as other referenced sections within that definition.

Burns & McDonnell has evaluated ELG and/or CCR compliance solutions for over 300 electric generating units (over 132 GW of capacity) for 58 utilities.

**APPALACHIAN POWER COMPANY &
WHEELING POWER COMPANY
WEST VIRGINIA CASE NO. 21-0810-E-PC
Staff Set 1**

Request 1-5

Which entity will pay for the technical expert and will the technical expert be involved in the preparation of the final design?

Response 1-5

WPCo and KPCo are responsible for the costs of Technical Expert on a 50:50 basis. The Technical Expert will not be involved in the design of the Mitchell Plant CCR and ELG retrofits.

**APPALACHIAN POWER COMPANY &
WHEELING POWER COMPANY
WEST VIRGINIA CASE NO. 21-0810-E-PC
Staff Set 1**

Request 1-6

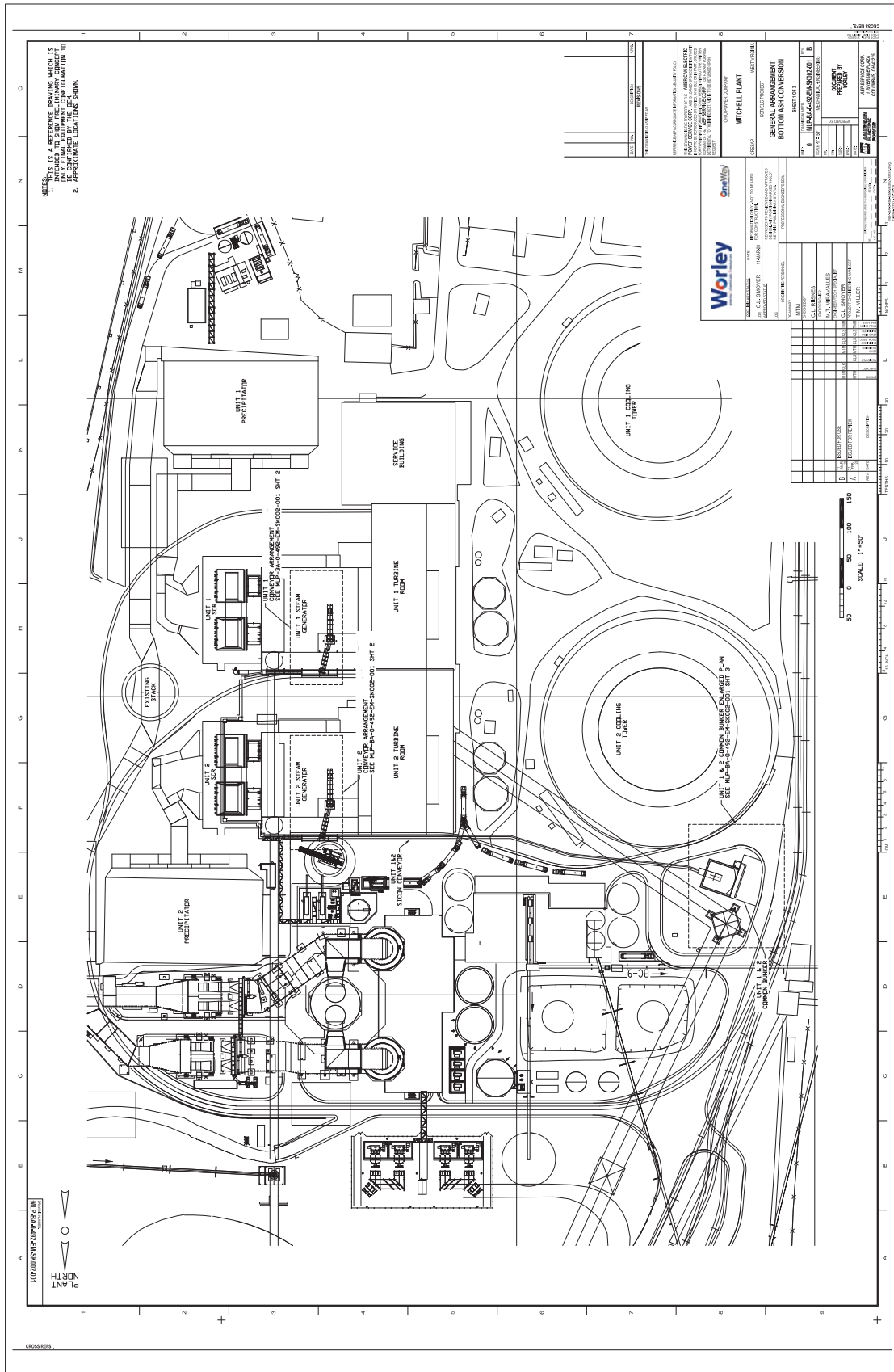
What is the current projected engineering and construction installed cost of the ELG work at both units. How does it differ from the cost submitted in the 20-1040 case? Were there any major engineering changes? What modifications changed the estimate provided? Please provide the detailed cost for each construction area and the new construction drawings.

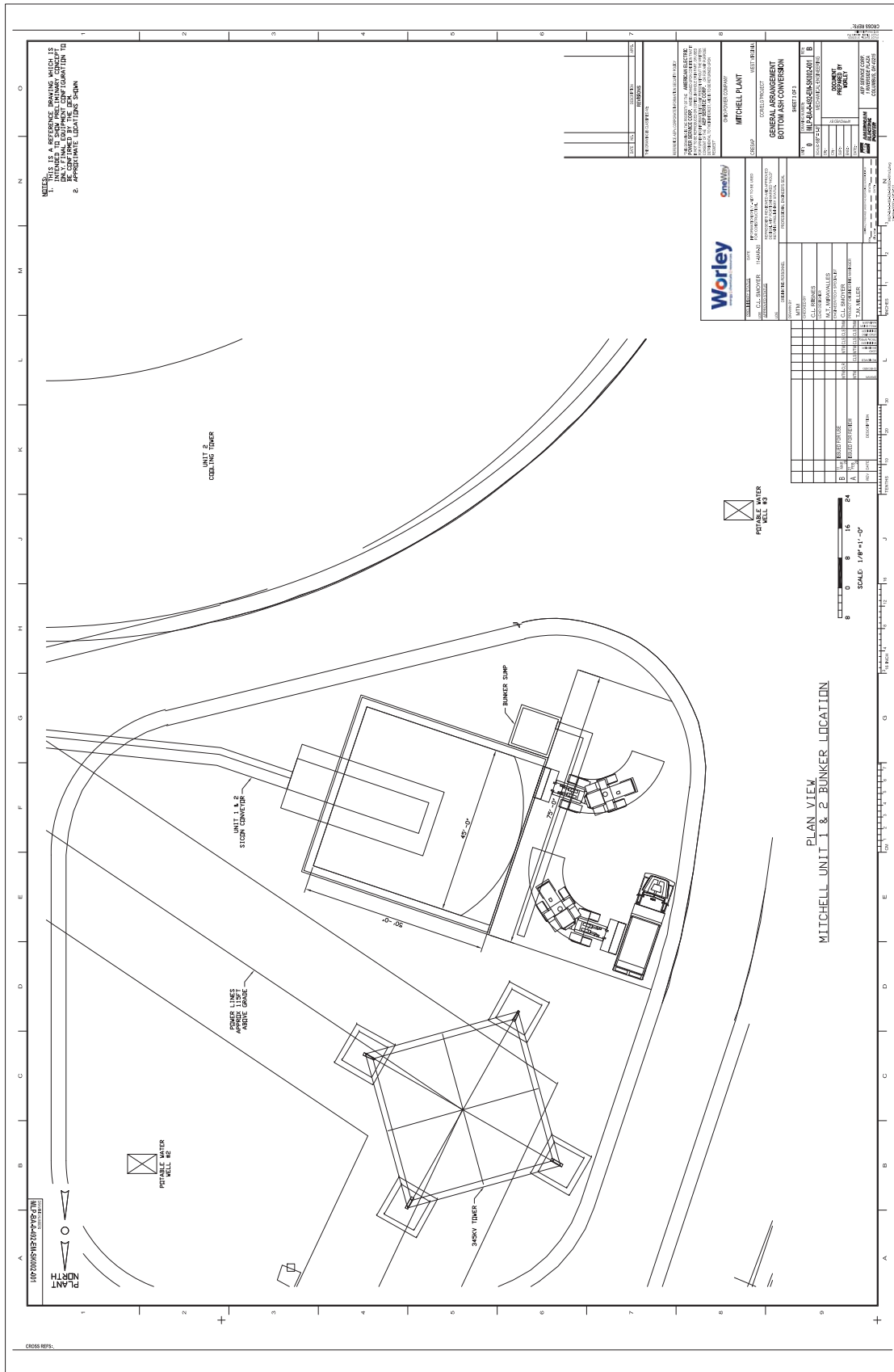
Response 1-6

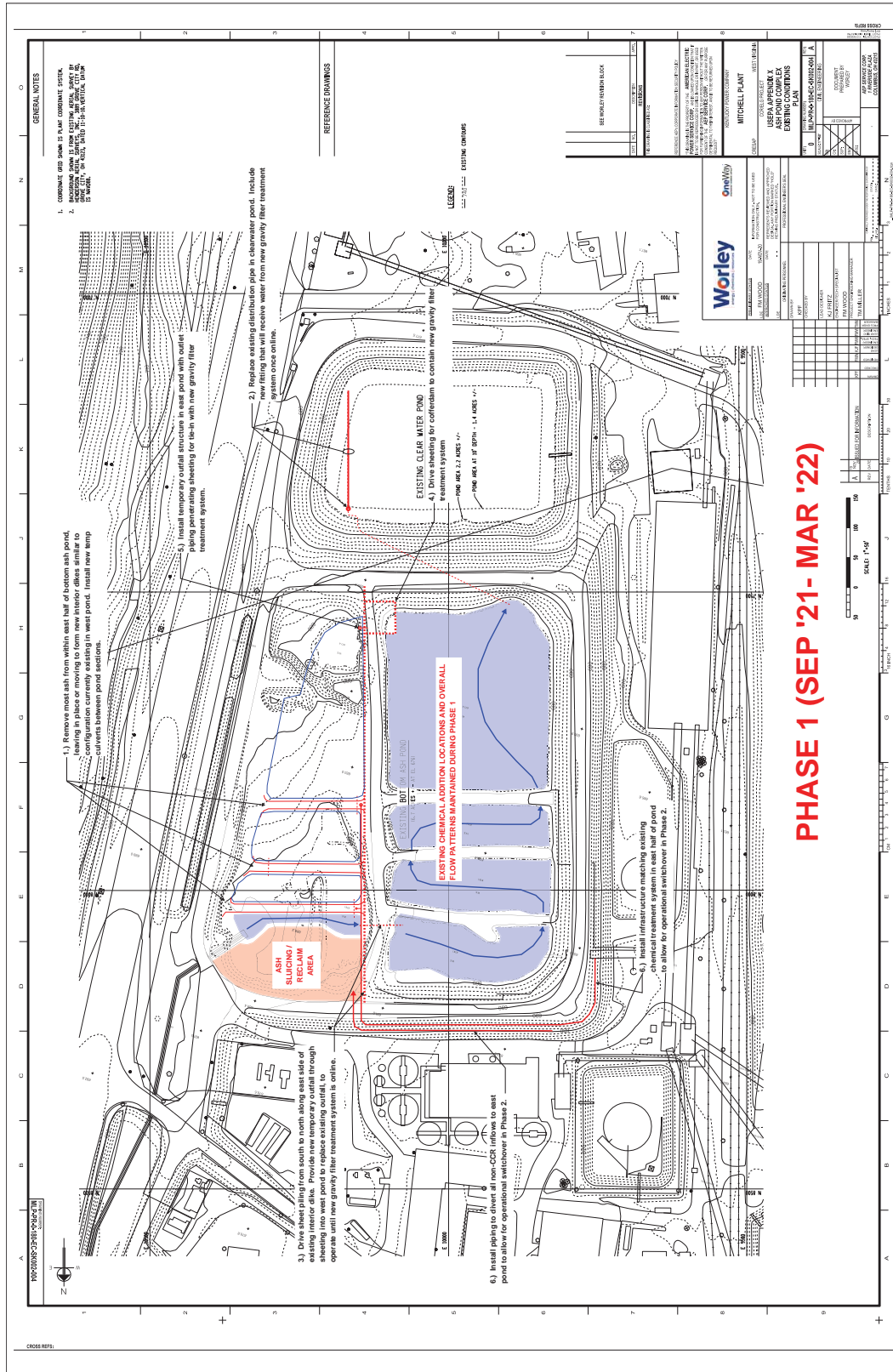
The Company's currently-estimated cost for the full CCR and ELG retrofit for the Mitchell Plant is \$148.3M, as presented in the testimony of Company witness Short on September 8, 2021 in Case No. 20-1040-E-CN. Detailed engineering and design for the ELG retrofit did not proceed until November 2021. To date, there have not been any major engineering and design changes that have progressed enough to update the cost estimate.

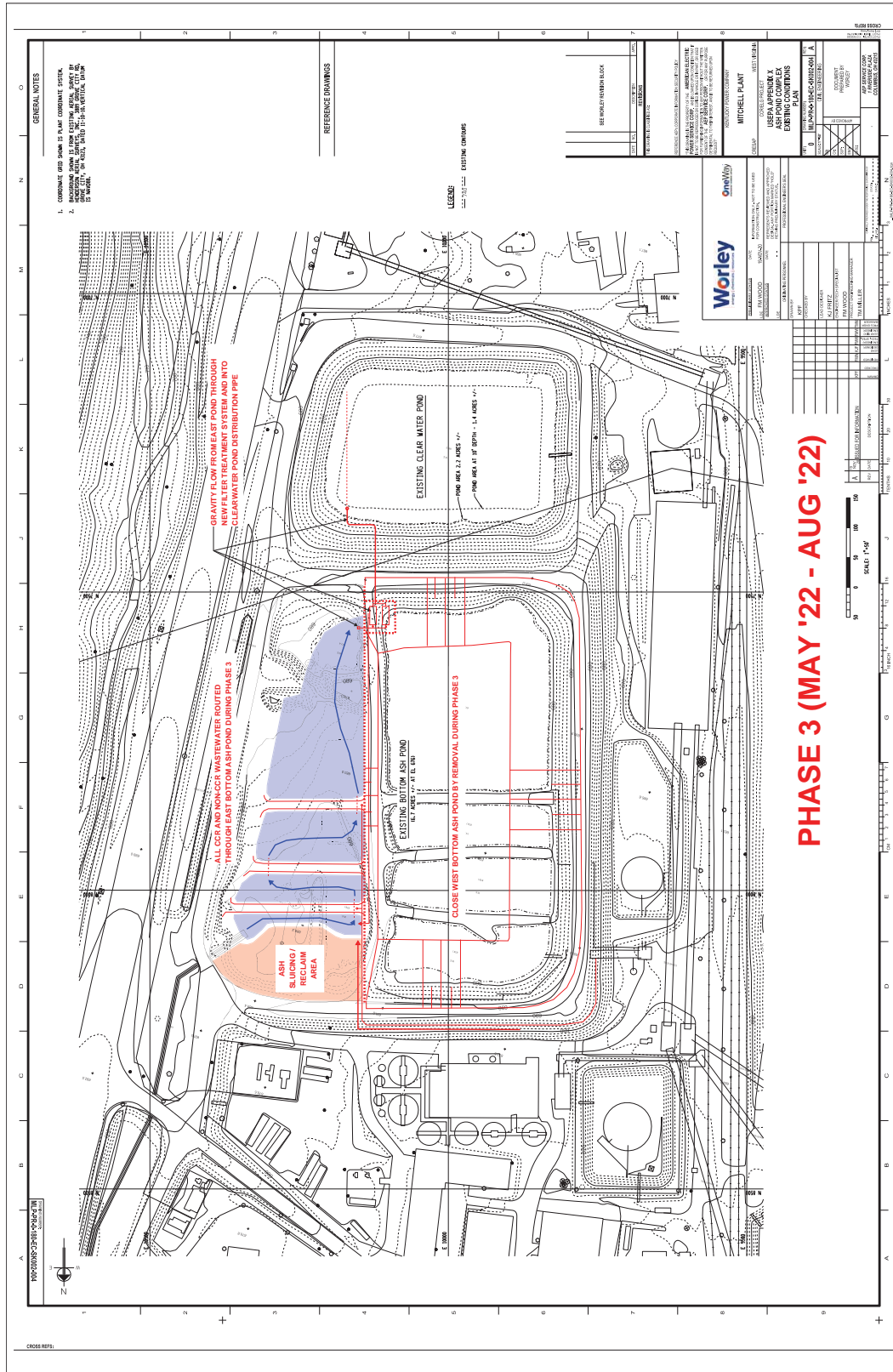
The allocation of costs between CCR and ELG work will be determined by the Technical Expert that has been engaged by WPCo and KPCo.

See Staff 1-06 Attachment 1 for preliminary general arrangement drawings associated with the CCR and ELG work to be performed at the Mitchell Plant. The Company anticipates final detailed design, construction drawings, and subsequent detailed cost estimates for the ELG work to be complete in the third quarter of 2022.









GENERAL NOTES

1. CONDUIT GRID SHOWN TO PLANT COORDINATE SYSTEM.
2. ALL CONDUITS SHALL BE INSTALLED WITH A MINIMUM COVER OF 18" UNLESS OTHERWISE NOTED.
3. ALL CONDUITS SHALL BE INSTALLED WITH A MINIMUM COVER OF 18" UNLESS OTHERWISE NOTED.

REFERENCE DRAWINGS

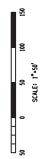
LEGEND

SEE SHEET PWB001-BLOCK

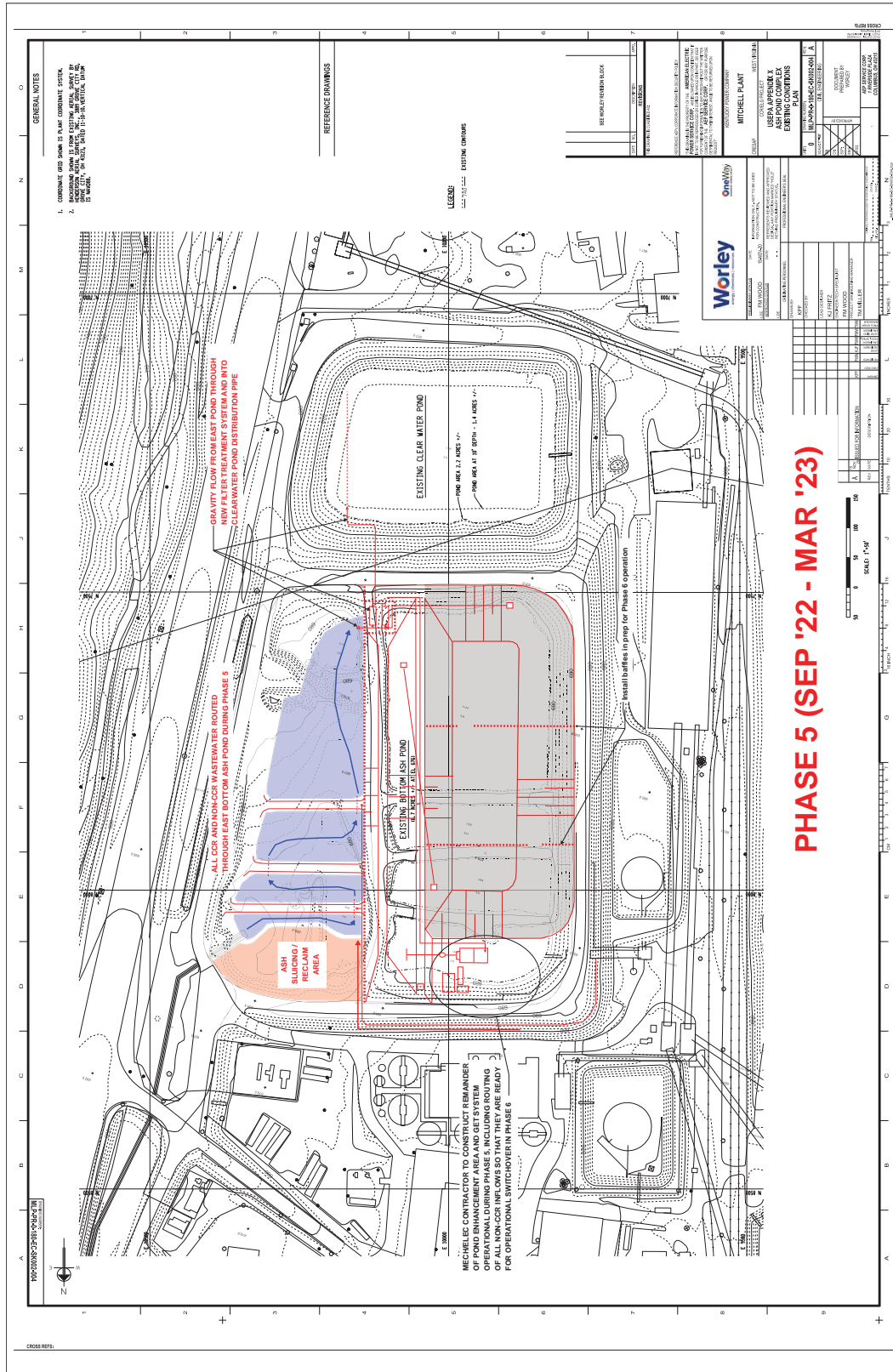


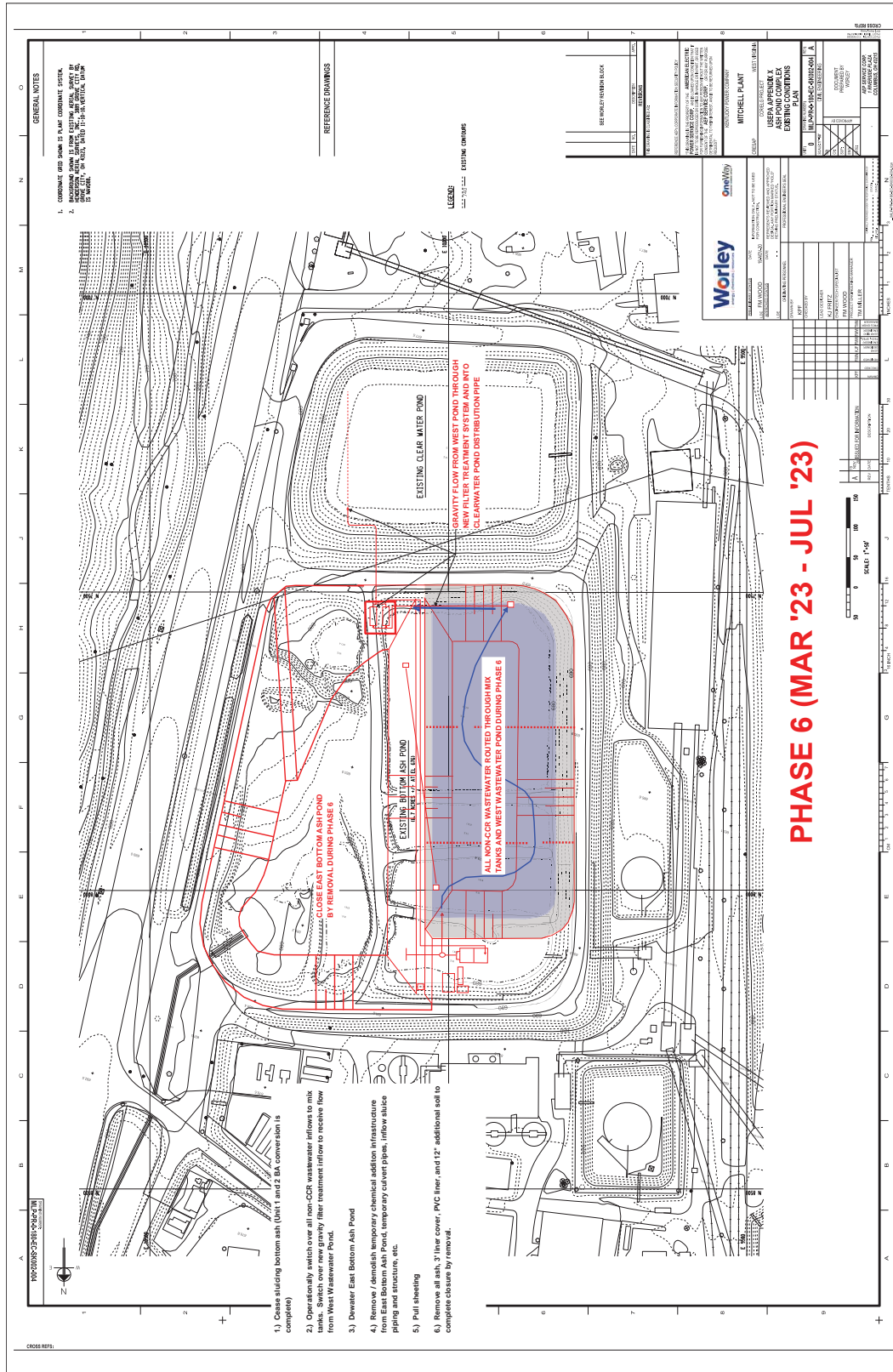
MITCHELL PLANT
 WASTEWATER TREATMENT PLANT
 PHASE 3
 WASTEWATER TREATMENT PLANT
 PHASE 3
 WASTEWATER TREATMENT PLANT
 PHASE 3

PHASE 3 (MAY '22 - AUG '22)



CROSS REF:





PHASE 6 (MAR '23 - JUL '23)

GENERAL NOTES

1. CONDUIT GRID SHOWN IS PLANT CONDUIT SYSTEM.
2. ALL CONDUITS SHALL BE INSTALLED IN ACCORDANCE WITH THE LATEST EDITION OF THE NATIONAL ELECTRICAL CODE (NEC) AND THE NATIONAL FIRE ALARM AND SIGNAL CODE (NFPA 72).
3. ALL CONDUITS SHALL BE INSTALLED IN ACCORDANCE WITH THE LATEST EDITION OF THE NATIONAL ELECTRICAL CODE (NEC) AND THE NATIONAL FIRE ALARM AND SIGNAL CODE (NFPA 72).

REFERENCE DRAWINGS

LEGEND

--- EXISTING CONDUIT

- 1) Close sliding bottom ash (Unit 1 and 2 BA conversion is complete)
- 2) Operationally switch over all non-CCR wastewater inflows to mix tanks. Switch over new gravity filter treatment inflow to receive flow from West Wastewater Pond.
- 3) Dewater East Bottom Ash Pond
- 4) Remove / demolish temporary chemical addition infrastructure from East Bottom Ash Pond, temporary culvert pipes, inflow sluice piping and structure, etc.
- 5) Pull sheeting
- 6) Remove all ash, 3" liner cover, PVC liner, and 12" additional soil to complete closure by removal.

Worley

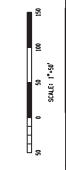
PROJECT: MILLIKEN WASTEWATER TREATMENT PLANT
 SHEET: 01-06-01-01
 DATE: 07/2023

MITCHELL PLANT

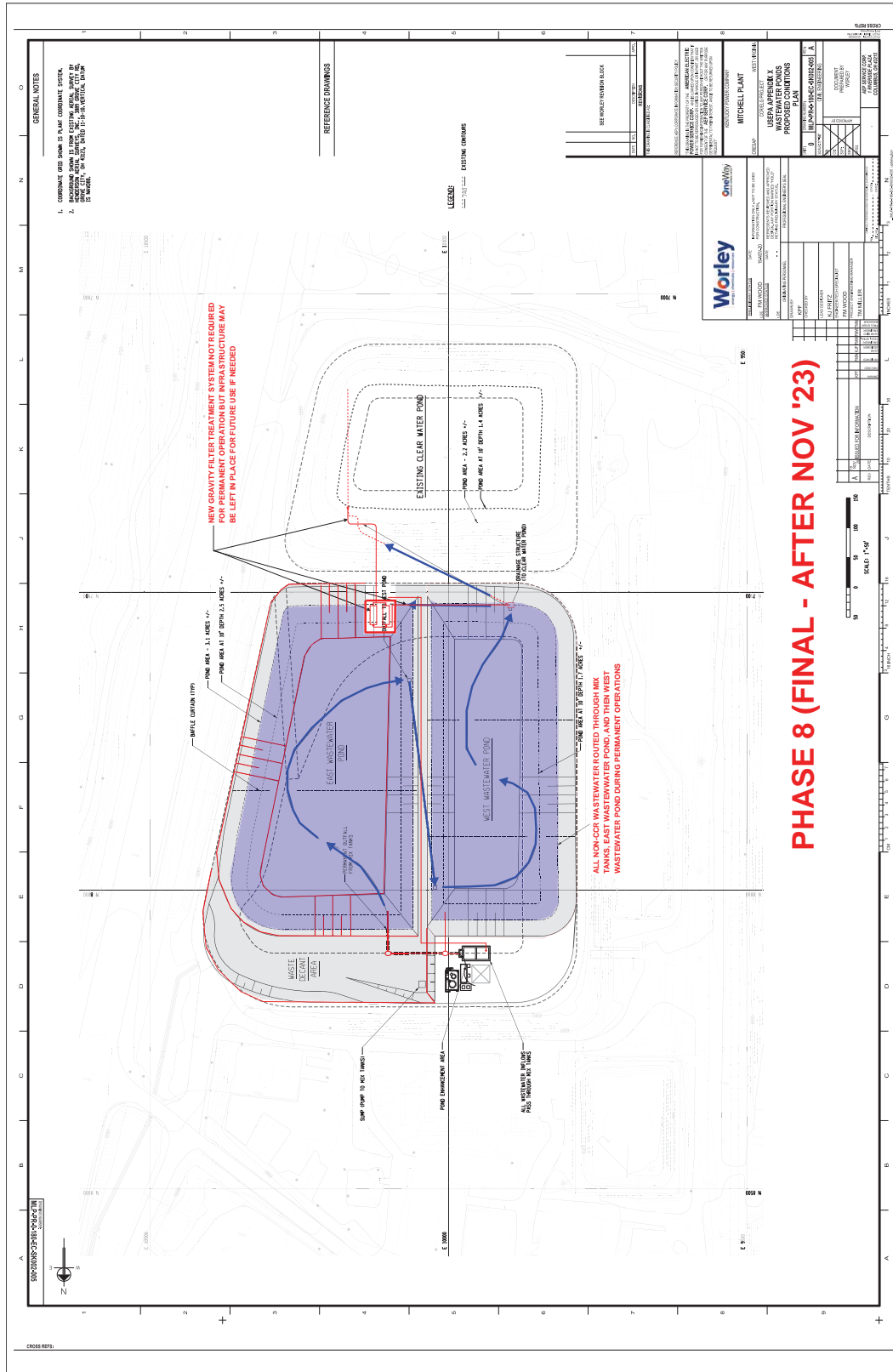
DESIGNED BY: JEFFREY A. HARRIS
 CHECKED BY: JEFFREY A. HARRIS
 DATE: 07/2023

**US EPA APPENDIX X
 DESIGN COMPLIANCE
 PLAN**

0 MILLIKEN WASTEWATER TREATMENT PLANT
 MILLIKEN WASTEWATER TREATMENT PLANT
 MILLIKEN WASTEWATER TREATMENT PLANT



CROSS REF:



**APPALACHIAN POWER COMPANY &
WHEELING POWER COMPANY
WEST VIRGINIA CASE NO. 21-0810-E-PC
Staff Set 1**

Request 1-7

Which entity will provide the O&M cost estimate for the ELG work?

Response 1-7

The engineering firm responsible for the retrofit design, along with the original equipment manufacturers, will provide a cost estimate of the O&M associated with future operation of the relevant systems/equipment as part of the design process. The Technical Expert will determine the ELG cost allocation and then the estimate will be reviewed and approved by the Operating Committee.

**APPALACHIAN POWER COMPANY &
WHEELING POWER COMPANY
WEST VIRGINIA CASE NO. 21-0810-E-PC
Staff Set 1**

Request 1-8

The CCR materials in the BAP were and will continue to be generated by both the KPCO and WPCO plant operations. Those materials have and will continue to generate ELG waters. How will those ELG waters be handled generated prior to the recent Commission Order and costed until the mechanical CCR handling equipment and final ELG system will be operational?

Response 1-8

The bottom ash will continue to be sent to the existing bottom ash pond complex until the ELG system is operational; therefore, the costs of discharging the BAP ELG water within permitted limits will continue to be shared by KPCO and WPCO until the ELG system is in operation.

After the ELG system is in operation, the allocation of costs between CCR and ELG activities will be determined by the Technical Expert that has been engaged by the Operating Committee (after the Operating Committee's review and approval).

**APPALACHIAN POWER COMPANY &
WHEELING POWER COMPANY
WEST VIRGINIA CASE NO. 21-0810-E-PC
Staff Set 1**

Request 1-9

When will the ELG cost allocation entirely to WPCO take effect?

Response 1-9

Any incurred ELG project costs will be allocated entirely to WPCo starting no later than July 15, 2021, the date of the Kentucky Public Service Commission's (KPSC) Order approving only CCR investments at the Mitchell Plant, and potentially earlier if the KPSC denies recovery of any of KPCo's share of preliminary study costs incurred prior to that date. Those costs will be recorded on WPCo's books once the Technical Expert engaged by Operating Committee determines the allocation between CCR and ELG costs, and the Mitchell Plant Ownership and O&M Agreements are approved by the Commission, the KPSC and the FERC.

**APPALACHIAN POWER COMPANY &
WHEELING POWER COMPANY
WEST VIRGINIA CASE NO. 21-0810-E-PC
Staff Set 1**

Request 1-10

How will ELG waters generated at the coal storage piles during storm events be allocated and costed?

Response 1-10

WPCo and KPCo have engaged a Technical Expert to review the CCR and ELG cost allocation, including Operation and Maintenance expenses. A decision on the allocation will be made by the Mitchell Operating Committee upon completion of the Technical Expert's review.

**APPALACHIAN POWER COMPANY &
WHEELING POWER COMPANY
WEST VIRGINIA CASE NO. 21-0810-E-PC
Staff Set 1**

Request 1-11

Will a possible future plant conversion to gas change the design of the new ELG transport, treatment and disposal? Will the new design account for that possibility?

Response 1-11

As explained in Company witness Beam's rebuttal testimony in Case No. 20-1040-E-CN, a possible future conversion of the Mitchell Plant from coal to natural gas (i.e. refueling) would not be economic. Consequently, while a possible conversion to gas might lead to design changes if such a conversion was a realistic future expectation, the design of the new ELG transport system, which is required if Mitchell is to continue burning coal after 2028, will not account for that possibility.

**APPALACHIAN POWER COMPANY &
WHEELING POWER COMPANY
WEST VIRGINIA CASE NO. 21-0810-E-PC
Staff Set 1**

Request 1-12

Please provide the names of all of the engineering firms providing the ELG and CCR designs.

Response 1-12

Worley Parsons is the only engineering firm providing ELG and CCR designs. There are also equipment suppliers providing designs, which include Babcock and Wilcox, Frontier, and Evoqua.

**APPALACHIAN POWER COMPANY &
WHEELING POWER COMPANY
WEST VIRGINIA CASE NO. 21-0810-E-PC
Staff Set 1**

Request 1-13

Please provide the names of all of the selected contractors currently working on ELG and CCR preparation work at the plant site.

Response 1-13

As of 1/11/2022, RB Jergens and its subcontractors are the only contractors working at the plant site.

**PUBLIC SERVICE COMMISSION
OF WEST VIRGINIA
CHARLESTON**

CASE NO. 21-0810-E-PC

**APPALACHIAN POWER COMPANY and
WHEELING POWER COMPANY,**
public utilities.

*Petition for Commission Consent and Approval
to Enter into Ownership and Operating Agreements
for the Mitchell Plant*

CERTIFICATE OF SERVICE

I, Keith D. Fisher, counsel for Appalachian Power Company and Wheeling Power Company, do hereby certify that a true and correct copy of the foregoing "Responses of Appalachian Power Company and Wheeling Power Company to Staff's First Data Request" was served upon the following, via electronic mail, on this 11th day of January, 2022:

Lucas R. Head, Esq. Public Service Commission of West Virginia 201 Brooks Street Charleston, WV 25301 <i>Counsel for Staff of WV Public Service Commission</i>	Robert F. Williams, Esq. Heather B. Osborn, Esq. John Auville, Esq. Consumer Advocate Division 300 Capitol Street, Suite 810 Charleston, WV 25301 <i>Counsel for Consumer Advocate Division</i>
Susan J. Riggs, Esq. Jason C. Pizatella, Esq. Spilman Thomas & Battle, PLLC 300 Kanawha Blvd E Charleston, WV 25301 <i>Counsel for WVEUG</i>	Derrick P. Williamson, Esq. Barry A. Naum, Esq. Spilman Thomas & Battle, PLLC 1100 Bent Creek Blvd, Suite 101 Mechanicsburg, PA 17050 <i>Counsel for WVEUG</i>



Keith D. Fisher (WV State Bar #11346)



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Category	Accession	Filed	Document	Docket	Description	Class/Type	Security Level	Files
Submittal	20211228-5273	12/28/2021	12/28/2021	ER22-452-000 ER22-453-000	Unopposed Motion of American Electric Power Service Corporation to Defer Effective Date, Request for Technical Conference, and Request for Shortened Comment Period with Expedited Consideration, Under Docket No. ER22-452 et.al.	Pleading/Motion Procedural Motion	Public	Generate PDF + AEP_s Procedural Motion 12-28-2021.PDF
Submittal	20211213-5232	12/13/2021	12/13/2021	ER22-453-000	(doc-less) Motion to Intervene of Energy Efficient West Virginia, et. al. under ER22-453.	Intervention Motion/Notice of Intervention	Public	Generate PDF + 1265928_Interv.txt
Submittal	20211210-5235	12/10/2021	12/10/2021	ER22-452-000 ER22-453-000	The Public Service Commission of Kentucky submits Request to Reject filings or Alternatively Protest under ER22-452, et. al.	Comments/Protest Comment on Filing	Public	Generate PDF + FINAL Request to Reject and Protest.pdf
Submittal	20211210-5167	12/10/2021	12/10/2021	ER22-453-000	Protest of Attorney General of Kentucky and Kentucky Industrial Utility Customers, Inc. under ER22-453	Comments/Protest Comment on Filing, Other Submittal Government Agency Submittal	Public	Generate PDF + Protest of Ky. AG and KIUC FERC ER22-453-000.pdf
Submittal	20211206-5211	12/06/2021	12/06/2021	ER22-452-000 ER22-453-000	(doc-less) Notice of Intervention of the Public Service Commission of Kentucky under ER22-452, et. al..	Intervention Motion/Notice of Intervention	Public	Generate PDF + 1264633_Interv.txt
Submittal	20211130-5228	11/30/2021	11/30/2021	ER22-453-000	(doc-less) Motion to Intervene of Public Service Commission of West Virginia under ER22-453.	Intervention Motion/Notice of Intervention	Public	Generate PDF + 1263343_Interv.txt
Submittal	20211123-5086	11/23/2021	11/23/2021	ER22-453-000 ER22-452-000	(doc-less) Motion to Intervene of Kentucky Industrial Utility Customers, Inc. under ER22-453, et. al.	Intervention Motion/Notice of Intervention	Public	Generate PDF + 1262365_Interv.txt
Submittal	20211122-5132	11/22/2021	11/22/2021	ER22-453-000	(doc-less) Motion to Intervene of Kentucky Attorney General under ER22-453.	Intervention Motion/Notice of Intervention	Public	Generate PDF + 1262153_Interv.txt
Submittal	20211122-5001	11/22/2021	11/19/2021	ER22-453-000	Kentucky Power Company submits tariff filing per 35.13(a)(2)(ii): New Mitchell Plant Agreements Concurrence to be effective 1/19/2022 under ER22-453 Filing Type : 10	Application/Petition/Request Tariff Filing	Public	Generate PDF + 1119 New Mitchell Agreements 205 Filing - Filing Package.pdf + FERC GENERATED TARIFF FILING.rtf
Issuance	20211122-3070 Expand Row	11/22/2021	11/22/2021	EC22-19-000 EC22-20-000 ER21-530-002 ER21-1280-000	Combined Notice of Filings #1, November 22, 2021: This notice contains information concerning multiple filings received by FERC.	Notice Formal Notice	Public	Generate PDF + CNF112221.docx

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Category	Accession	Filed	Document	Docket	Description	Class/Type	Security Level	Files
Submittal	20211228-5273	12/28/2021	12/28/2021	ER22-452-000 ER22-453-000	Unopposed Motion of American Electric Power Service Corporation to Defer Effective Date, Request for Technical Conference, and Request for Shortened Comment Period with Expedited Consideration, Under Docket No. ER22-452 et.al.	Pleading/Motion Procedural Motion	Public	Generate PDF + AEP_s Procedural Motion 12-28-2021.PDF
Submittal	20211227-5247	12/27/2021	12/27/2021	ER22-452-000	Motion to Intervene Out-of-Time of Energy Efficient West Virginia, et. al. under ER22-452.	Intervention Motion to Intervene Out of Time	Public	Generate PDF + CAG&EEWV Motion to Intervene Out-Of-Time .pdf
Submittal	20211210-5235	12/10/2021	12/10/2021	ER22-452-000 ER22-453-000	The Public Service Commission of Kentucky submits Request to Reject filings or Alternatively Protest under ER22-452, et. al.	Comments/Protest Comment on Filing	Public	Generate PDF + FINAL Request to Reject and Protest.pdf
Submittal	20211206-5211	12/06/2021	12/06/2021	ER22-452-000 ER22-453-000	(doc-less) Notice of Intervention of the Public Service Commission of Kentucky under ER22-452, et. al..	Intervention Motion/Notice of Intervention	Public	Generate PDF + 1264633_Interv.txt
Submittal	20211123-5086	11/23/2021	11/23/2021	ER22-453-000 ER22-452-000	(doc-less) Motion to Intervene of Kentucky Industrial Utility Customers, Inc. under ER22-453, et. al.	Intervention Motion/Notice of Intervention	Public	Generate PDF + 1262365_Interv.txt
Submittal	20211122-5133	11/22/2021	11/22/2021	ER22-452-000	(doc-less) Motion to Intervene of Kentucky Attorney General under ER22-452.	Intervention Motion/Notice of Intervention	Public	Generate PDF + 1262156_Interv.txt
Issuance	20211122-3070 Expand Row	11/22/2021	11/22/2021	EC22-19-000 EC22-20-000 ER21-530-002 ER21-1280-000	Combined Notice of Filings #1, November 22, 2021: This notice contains information concerning multiple filings received by FERC.	Notice Formal Notice	Public	Generate PDF + CNF112221.docx
Submittal	20211119-5269	11/19/2021	11/19/2021	ER22-452-000	Wheeling Power Company submits tariff filing per 35.13(a)(2)(i)(ii): New Mitchell Plant Agreements: Ownership; Operation and Maintenance to be effective 1/19/2022 under ER22-452. Filing Type : 10	Application/Petition/Request Tariff Filing	Public	Generate PDF + 1119 New Mitchell Agreements 205 Filing - Filing Package.pdf + FERC GENERATED TARIFF FILING.rtf

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