

Kentucky Power Company  
KPSC Case No. 2022-00036  
Commission Staff's Second Set of Data Requests  
Dated May 9, 2022

**DATA REQUEST**

- 2\_1** Refer to Kentucky Power's response to Commission Staff's First Request for Information (Staff's First Request), Item 2, Attachment 1. For contract no. 07-77-05-900,
- a. Explain and compare the characteristics of the coal obtained from the McElroy Mine and the Century Mine; and
  - b. Explain how the coal from the Century mine in Ohio was actually transported to the Mitchell plant.

**RESPONSE**

- a. Although there are two sources listed under the agreement, Mitchell received 100% of its coal from the McElroy mine under the quality specification for belt coal to Mitchell during the review period. Century mine is listed as a source to provide flexibility in the agreement should the Mitchell Plant need to receive coal by barge. The coal delivered by barge has slightly different quality specification including a lower heating value and a higher permitted ash content. The quality specification for sulfur is the same for both sources.
  
- b. Coal from the Century mine in Ohio was transported by barge to the Mitchell Plant.

Witness: Kimberly K. Chilcote

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**DATA REQUEST**

- 2\_2** Refer to Kentucky Power's response to Staff's First Request, Item 3, Attachment, page 1 of 1. Note 1 states, "[Kentucky Power] and Seller agreed to nonratable shipment volumes for the period."
- a. Explain what nonratable shipment volumes means in this instance and how it might affect the shipment volumes delivered to Kentucky Power.
  - b. Explain why Kentucky Power decided to agree to nonratable shipment volumes.

**RESPONSE**

- a. Non-ratable is any monthly volume that is not equal to the contractual volume divided by the number of months that volume is associated with. Therefore, the quantity received in a period may be greater or less than the ratable requirement. This allows the seller's shipment volumes to vary from month to month. Each month the actual volume of coal received is checked against the schedule and any tons not delivered are added to subsequent months to ensure the annual volume is reached.
- b. Kentucky Power continually works with the supplier on a mutually agreeable delivery schedule of shipments in order to meet the contractual obligation during the term of the agreement, and this may include non-ratable shipments. Non-ratable shipments benefit both Kentucky Power and its suppliers by allowing both parties to adjust schedules to allow for reduced shipments when either party may have an outage and then increasing shipments when more coal is available and needed.

Witness: Kimberly K. Chilcote

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**DATA REQUEST**

- 2\_3** Refer to Kentucky Power's response to Staff's First Request, Item 3.  
Explain, on a monthly basis, what the actual fuel burn rate was for the Mitchell plant.

**RESPONSE**

The tons burned at Mitchell during the review period per page 5 of the monthly FAC filings entitled "Coal Inventory Schedule" were as follows:

May 2021: 79,815 Tons

June 2021: 126,709 Tons

July 2021: 152,721 Tons

August 2021: 147,558 Tons

September 2021: 116,646 Tons

October 2021: 65,834 Tons

Witness: Kimberly K. Chilcote

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**DATA REQUEST**

- 2\_4** Refer to Kentucky Power's response to Staff's First Request, Item 4, KPCO\_R\_PSC\_1\_4\_CONFIDENTIAL\_Attachment2 (May 14, 2021 RFP) and KPCO\_R\_PSC\_1\_4\_CONFIDENTIAL\_Attachment3 (September 20, 2021 RFP)
- a. Explain whether Kentucky Power has for the period under review or is currently having trouble acquiring adequate supplies of coal. If so, explain the reasons.
  - b. Explain the differences between the public (green highlight) and confidential (yellow highlight) in the two spreadsheets.
  - c. Explain whether Kentucky Power ultimately entered into contracts with the companies highlighted in green. If not, explain why not.
  - d. The May 2021 Request for Proposal (RFP) bid sheet contains several lines for which there is no comment as to whether Kentucky Power ultimately accepted a bid, proposed acceptance, or rejected the bid for cause. Provide an update on the status of those bids.
  - e. The May 2021 RFP bid sheet has two bids for which a purchase is proposed. Provide an update as to whether Kentucky Power entered into a contract.
  - f. The spreadsheets contain different SO<sub>2</sub> removal costs per ton such that the September spreadsheet (Attachment3) SO<sub>2</sub> removal cost is almost twice that of the May spreadsheet (Attachment2). Explain the causes for the difference.

**RESPONSE**

- a. At the onset of the review period coal was available in the market; however as the period progressed the dynamics of the coal and energy market changed as the demand for coal increased rapidly during the summer of 2021. In April 2021, coal was available in the market as there was low demand and high inventory levels across the industry, along with limited domestic coal being shipped into the export market. Based on the coal forecast and Kentucky Power's needs at that time, Kentucky Power's issued a Request for Proposal ("RFP") in May 2021 seeking coal for the period of 2022 through 2024. No additional coal was requested for 2021 delivery due to the high inventory levels during the first half of 2021 and low forecasted burns for the balance of 2021. Additional coal was purchased for 2022 and 2023 based on Kentucky Power's fuel procurement strategy of layering tons in over time.

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In July 2021, the cost of natural gas began to increase which resulted in the demand for coal increasing as it became the lower cost option for power production in both the import and export markets. This increase in demand for coal for power production along with stronger demand in the export market caused tight supply from all coal basins in 2021, which has continued into in 2022, as well as sharply higher coal prices.

Following the elevated burns of the summer of 2021 Kentucky Power issued an RFP in September 2021 requesting additional CAPP and NAPP coal for the fourth quarter of 2021 through 2023. Kentucky Power received no offers for any 2021 supply of NAPP and CAPP coal and limited offers for NAPP and CAPP coal in 2022 and 2023. All offers received were significantly higher than the prices that Kentucky Power already had under contract. Subsequent to the RFP, with the limited offers received of CAPP and NAPP coal, Kentucky Power began evaluating non-traditional coals, such as Illinois Basin and lower quality Ohio Seam coals, to obtain additional supply. Kentucky Power worked with several suppliers after the RFP to seek additional supply for 2022 and 2023. Several suppliers were able to provide a small volume of tons in 2022 but required a commitment for longer-term agreements to secure tons for 2022 and 2023. Kentucky Power continuing to work with suppliers to secure additional tons.

b. The green highlight is the published Argus market pricing at the time the RFP was issued for the stated specification of coal . The yellow highlight is the offer provided by each counterparty that responded to the Company's RFP.

c. No, Kentucky Power did not enter into agreements for the data in the green highlight as those are the Argus market prices and not actual offers from coal suppliers.

d. Please see the Company's May 18, 2022 supplemental response to Staff 1-4 for the requested information.

e. Yes, Kentucky Power entered into agreements with the two bids referenced in this question. The two parties and their contracts are:

- Blackhawk Coal Sales, LLC agreement 03-00-21-9M1,
- Alpha Thermal Coal Sales Company agreement 03-00-21-9M2.

f. The SO<sub>2</sub> scrubber cost is reviewed and updated annually. When the SO<sub>2</sub> scrubber cost is updated all subsequent RFP's contain the updated SO<sub>2</sub> scrubber cost. The SO<sub>2</sub> scrubber cost was updated after the May 2021 RFP, resulting in the updated cost doubling in the September 2021 RFP. The SO<sub>2</sub> cost is calculated based on the total cost to remove a ton of SO<sub>2</sub> and the tons of SO<sub>2</sub> removed.

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Witness: Kimberly K. Chilcote

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**DATA REQUEST**

**2\_5** Refer to Kentucky Power's response to Staff's First Request, Item 13, Attachment 1. Explain each of the account numbers listed.

**RESPONSE**

See KPCO\_R\_KPSC\_2\_5\_Attachment1 for information explaining the charges for each account.

Witness: Scott E. Bishop

<u>Account</u>	<u>Account Description</u>	<u>Description of Charges</u>
4470006	Sales for Resale - Bookout Sales	This account shall include the net billing for electricity supplied for sales for resale for non-associated companies - bookouts
4470010	Sales for Resale - Bookout Purch	This account shall include revenues for sales for resale - bookout purchases.
4470081	Financial Spark Gas - Realized	This account shall include the net billings of settled spark gas financial transactions. (No charges included.)
4470082	Financial Electric Realized	This account shall include settled financial electric optimization transactions (Swaps and Futures) entered into on or after 10-01-03
4470089	PJM Energy Sales Margin	To record ECR's (East Cost Reconstruction Process) derived margin with PJM for spot energy sales to PJM.
4470098	PJM Oper.Reserve Rev-OSS	To record operating reserve charges with PJM allocated to off-system sales (OSS).
4470099	Capacity Cr. Net Sales	To record capacity credit revenue with PJM and other third parties.
4470100	PJM FTR Revenue-OSS	To record FTR revenue with PJM allocated to off-system sales (OSS).
4470103	PJM Energy Sales Cost	To record ECR's derived cost of sales revenue with PJM for spot energy sales to PJM.
4470107	PJM NITS Purch-NonAff.	To record network integration transm. service expense with PJM. (No charges included.)
4470110	PJM TO Admin. Exp.-NonAff.	To record transmission owner scheduling, system control, & dispatch service expense with PJM.
4470112	Non-Trading Bookout Sales-OSS	To record revenues from non-trading off-system sales (OSS) - Bookouts. (No charges included.)
4470115	PJM Meter Corrections-OSS	To record net PJM meter corrections allocated to off-system sales (OSS)
4470126	PJM Incremental Imp Cong-OSS	To record incremental PJM implicit congestion not in ECR for off-system sales
4470127	Sales for Res-Affil Pool Cap.	Record Sales for Resale activity for Affiliated Pool Capacity. (No charges included.)
4470131	Non-Trading Bookout Purch-OSS	To record purchased power for non-trading off-system sales (OSS) - Bookouts.



<u>Account</u>	<u>Account Description</u>	<u>Description of Charges</u>
4470143	Financial Hedge Realized	This account shall include settled financial power transactions (Swaps and Futures) applicable to hedge activity
4470151	Trading Auction Sales Affil	Sales activity to serve an auction managed by another AEP affiliate
4470175	OSS Sharing Reclass - Retail	To record and reflect the estimated amount of OSS margin shared with retail ratepayers.
4470176	OSS Sharing Reclass-Reduction	This account will record and reflect the estimated amount of OSS margin shared with retail ratepayers. The amount recorded in the account will be equal to and offsetting of the amount recorded in OSS Sharing Reclass - Retail
4470206	PJM Trans loss credits-OSS	To record transmission loss credits w/PJM allocated off-system sales
4470209	PJM transm loss charges-OSS	To record transmission loss charges w/PJM allocated to Off-System Sales (OSS)
4470214	PJM 30m Suppl Reserve CR OSS	To record 30 minute supplemental reserve market credit for OSS (off system sales) where net service is revenue. The 30 minute supplemental reserve market is a market based service that applies to resources that can provide reserve capability that can be converted into energy w/in 30 minutes of request OSS would receive any net credits.
4470215	PJM 30m Suppl Reserve CH OSS	To record 30 minute supplemental reserve market charges for OSS (off system sales) where net service is revenue. The 30 minute supplemental reserve market is a market based service that applies to resources that can provide reserve capability that can be converted into energy w/in 30 minutes of request OSS would receive any net credits
4470220	PJM Regulation - OSS	This account is used to record the net credit when PJM Regulation Credits exceed PJM Regulation Charges.
4470221	PJM Spinning Reserve - OSS	This account is used to record the net credit when PJM Spinning Reserve Credits exceed PJM Spinning Reserve Charges.

<u>Account</u>	<u>Account Description</u>	<u>Description of Charges</u>
4470222	PJM Reactive - OSS	This account is used to record the net credit when PJM Reactive Credits exceed PJM Reactive Charges
5550039	PJM Inadvertent Mtr Res-OSS	To record PJM inadvertent energy expense allocated to off-system sales-OSS
5550099	PJM Purchases-non-ECR-Auction	To record PJM purchases (non-ECR) used to serve auction loads that were previously recorded as physical in 5550035. (No charges included.)
5570007	Other Pwr Exp - Wholesale RECs	To record expenses related to requirements of wholesale marketing relationships. Includes purchase costs associated with renewable energy credits (RECs), as well as related administrative fees and alternative compliance payments.
5614000	PJM Admin-SSC&DS-OSS	PJM administrative service fees for scheduling, system control and dispatching services allocated to off-system sales.
5614008	PJM Admin Defaults OSS	To record costs in PJM when a market participant defaults on its payment obligations with PJM. These charges are socialized across all participants in PJM. This administrative fee relates to the OSS (Off System Sales).
5618000	PJM Admin-RP&SDS-OSS	PJM administrative service fees for reliability planning and standards development services allocated to off-system sales. This account shall include the costs billed to the transmission owner, load serving entity, or generator for system planning of the interconnected bulk electric transmission system
5757000	PJM Admin-MAM&SC- OSS	PJM administrative service fees for market administration, monitoring and compliance services allocated to off-system sales. This account shall include the costs billed to the transmission owner, load serving entity or generator for market administration, monitoring and compliance services.

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**DATA REQUEST**

- 2\_6** Refer to Kentucky Power's response to Staff's First Request, Item 15.
- a. Explain the difference between a Planned Outage, Maintenance Outage, and Forced Outage.
  - b. Explain in detail how far in advance Kentucky Power schedules its Maintenance Outages and Planned Outages before taking the units offline.
  - c. Explain whether, during the period of review, Kentucky Power designated any unscheduled outages that require substitute power for a continuous period in excess of six hours as Maintenance Outages or Planned Outages. If so, list the instances in which this has occurred and explain why these outages were not designated as Forced Outages.

**RESPONSE**

a. A Planned Outage is an outage lasting several weeks and is taken to permit the Company to perform work on major equipment groups that are not immediately required for the safe operation of the unit. Maintenance Outages are taken to perform repair and maintenance work. A Forced Outage is an unplanned outage to address an immediate operational or safety concern at the generation facility. Forced outages typically last from a few hours to several days depending on the situation.

b. Planned Outages are scheduled approximately a year in advance. The dates of the Planned Outages are approved by PJM. Maintenance Outages also are approved by PJM. They require shorter lead time for notifying PJM and may be initially scheduled for up to nine days, although they may be extended once underway. The lead time for the Maintenance Outage request to PJM can be as little as a day. However, the unit for which a Maintenance Outage request is being made must be able to run through the following Monday for it to qualify for, and for PJM to approve it as, a Maintenance Outage.

c. During the review period, Kentucky Power did not designate any unscheduled outages that required substitute power for a continuous period in excess of six hours as Maintenance Outages or Planned Outages. There were no instances in the review period where a unit was online and experienced an unscheduled outage that was classified as a Maintenance Outage or a Planned Outage.

The question contemplates a scenario which is not feasible, namely that the Company would experience two different designations simultaneously. Should the Company be in a Maintenance Outage or Planned Outage and subsequently have cause to be in a Forced

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Outage (i.e. unscheduled outage) the designation would change to Forced Outage accordingly.

Witness: Paul J. Massie

Witness: Douglas J. Rosenberger

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**DATA REQUEST**

- 2\_7** Refer to Kentucky Power's response to Staff's First Request, Item 15. In the event where a Mitchell unit goes down or off line with an outage and as a result, both Wheeling Power and Kentucky Power purchase energy:
- a. Explain whether there would be a single purchase transaction that is then allocated to the two utilities or two separate market transactions. If there is a single transaction, explain the allocation methodology.
  - b. Explain the role of the Power Coordination Agreement would have, if any.
  - c. If not answered above, explain whether Kentucky Power and Wheeling Power pay the same Locational Marginal Pricing (LMP) price. If not, explain why not.
  - d. For the monthly periods for which the units are running, explain the time PJM selects the units to run and the time the units are available but not selected to run. Include in the response the corresponding levels of output (intensity) for each unit. For example, if the units are not selected, but are available, the units may run at their lowest level of output and would have to ramp up in called upon to run.
  - e. For the monthly periods for which the units bid in price is equal to or less than the LMP and the units are selected to run, explain whether the units also simultaneously provide ancillary services. If so, list the ancillary services for which the units participate.
  - f. For the monthly periods for which the units are not selected to run by PJM but are available, explain whether the units provide ancillary services. If so, list the ancillary services for which the units participate.

**RESPONSE**

a. AEPSC Commercial Operations offers all of AEP's generating resources into their respective Regional Transmission Organization each day and purchases each operating company's load each hour of the day. Net Market purchases result in any hour when an operating company's purchased load is greater than the amount of its generation that is sold into the PJM energy markets and such a purchase would be directly assigned to that operating company, just as each Company's generating resources are directly assigned to it through PJM's billing process.

There would be two separate market purchase transactions. Kentucky Power is priced at the AEPKPD residual load aggregate and Wheeling Power is priced at the AEPWPD residual load aggregate. These nodes are different because each company provides service to a different service territory. LMP's are comprised of the price of the energy,

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the cost of transmission congestion, and the cost of marginal losses. The price of the LMP is derived from the pricing node's physical location, thus Kentucky Power and Wheeling Power would each have their own market transaction at the prices of each of the Company's aggregate nodes, respectively.

b. The Power Coordination Agreement does not allocate day to day energy transactions.

c. Please see the Company's response to part a of this question.

d. There are four designations for unit commitment in PJM. First there is "economic" commitment, meaning the unit is available but may not be selected at clearing price. The second designation is "must run", meaning the unit runs at its economic minimum and might not be selected if incremental price is above clearing price. The third designation is the "emergency" status where PJM will only call on the unit in the event of an emergency. Lastly, the fourth designation is "not available", meaning the unit is not available for dispatch which usually occurs when the unit is in an outage. Please see KPCO\_R\_KPSC\_2\_07\_PUBLIC\_Attachment1 for each unit's hourly commitment status and its corresponding output during the audit period.

e. If a unit is selected to run in the energy market it can also provide ancillary services (regulation and spinning reserves) unless it is derated or has limited capacity due to testing. Mitchell can provide the following ancillary services: Day-Ahead Operating Reserve, Balance Operating Reserve, Balance Operating Reserve Lost Opportunity, Synchronous Condensing, Synchronous Condensing Lost Opportunity Cost, Reactive Services, Reactive Services Lost Opportunity Cost, Reactive Services Condensing, Reactive Services Condensing Lost Opportunity Cost, Reg Regulation Market Capability Clearing Price (RMCCP), Reg Regulation Market Performance Clearing Price (RMPCP), Regulation Lost Opportunity Cost, Synchronized Reserve Tier 1, Synchronized Reserve Market Clearing Price, Synchronized Reserve Lost Opportunity Cost, Day-Ahead Scheduling Reserve, Non-Synchronized Reserve, Non-Synchronized Reserve Market Clearing Price, Non-synchronized Reserve Lost Opportunity Cost per the PJM MSRS report entitled "Generator Credit Summary" available at <https://www.pjm.com/markets-and-operations/etools/msrs.aspx>.

f. If the unit is not selected to run in the energy market it does not provide ancillary services.

Witness: Jason M. Stegall

**The Attachment is Redacted in its Entirety.**

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**DATA REQUEST**

- 2\_8** Refer to Kentucky Power's response to Staff's First Request, Items 1, 4, 15, and 16. Explain how Kentucky Power manages its coal purchases and its coal deliveries in relation to the frequent and sometimes extended unit outages and overall low-capacity factors.

**RESPONSE**

Kentucky Power's fuel procurement strategy is to purchase the amount of coal needed to satisfy its forecasted level of generation. The intent of this strategy is to schedule deliveries of coal that ensure the Company's generating units can supply energy to PJM in the critical summer and winter seasons as well as during the fall and spring seasons. While delivery schedules are defined in each contract, the schedules can be modified by agreement of the parties to accommodate outages.

Historically, coal inventory has not been an issue, but increased global and domestic demand for coal beginning in the summer of 2021 resulted in limited coal availability. The availability of the Company's generating units in some months has been affected by efforts to maintain adequate coal supply to ensure its units are available during peak months. Kentucky Power monitors the coal inventory levels to ensure that an adequate supply is available. In the 4th quarter 2021, in response to an industry-wide fuel supply shortage, PJM began requiring weekly updates on fuel inventories for each of the generating plants. As part of this initiative, PJM initiated a process where utilities are required to report weekly updates on inventory and if inventory levels fall below 10 days, PJM could require the unit be placed offline until fuel inventories reached at least 21 days. Kentucky Power's inventory levels did not fall below 10 days during the review period.

During the review period of May 1, 2021 through October 31, 2021, the Company's generating units, Big Sandy Unit 1 and Mitchell Units 1 and 2, were available 62.1 percent of the time, meaning they were either in service or available for service, but not selected by PJM as economic. The other 37.9 percent of the time, the units were unavailable primarily due to PJM-approved maintenance outages needed to address conditions that could eventually force them out of service if not addressed. The Company works diligently to schedule outages when they will have the least effect on customers, while keeping those same units operational during peak periods to lessen the dependence on purchased power. In the Company's response to KPSC 2-6, Planned, Forced and Maintenance Outages were defined. The Company schedules Planned Outages during the "shoulder months" of March, April, May, September, October, November and December when energy demand is expected to be less. Milder temperatures typically experienced in



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shoulder months historically result in lower energy prices and lower customer consumption. PJM restricts the Company's ability to schedule Planned Outages during the months of January, February, June, July and August. Planned Outages and Maintenance Outages help to ensure that Company-owned units are available and reliable during periods of high energy demand when prices tend to be higher.

Witness: Kimberly K. Chilcote

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**DATA REQUEST**

- 2\_9** Refer to Kentucky Power's response to Staff's First Request, Item 22. Yellow highlighted spreadsheet items were purchased with the subsequent contract numbers listed. In Item 4 Attachment3, it is not clear whether the company in green highlight was purchased even though the coal prices are among the lowest in the solicitation. Explain why.

**RESPONSE**

Kentucky Power did not enter into agreements for the data in the green highlight as those are the Argus market prices and not actual offers from coal suppliers.

Witness: Kimberly K. Chilcote



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#### E-Signature Summary

**E-Signature 1: Kimberly Chilcote (KKC)**

May 17, 2022 05:11:41 -8:00 [B7CE27D5AFE3] [167.239.221.105]  
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**E-Signature Notary: Jennifer Young (JAY)**

May 17, 2022 05:11:41 -8:00 [44FD77BDDBA8] [167.239.221.102]  
jayoung1@aep.com

I, Jennifer Young, did witness the participants named above electronically sign this document.









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**E-Signature 1: Douglas J Rosenberger (DJR)**

May 16, 2022 12:37:50 -8:00 [929D1EBC2E79] [167.239.221.105]  
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**E-Signature Notary: Jennifer Young (JAY)**

May 16, 2022 12:37:50 -8:00 [17B0E53FF799] [167.239.221.101]  
 jayoung1@aep.com  
 I, Jennifer Young, did witness the participants named above electronically sign this document.











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#### E-Signature Summary

**E-Signature 1: Jason M. Stegall (JMS)**

May 17, 2022 11:19:58 -8:00 [071955D3290D] [167.239.221.101]  
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**E-Signature Notary: Jennifer Young (JAY)**

May 17, 2022 11:19:58 -8:00 [036CDA1C7884] [167.239.221.102]  
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I, Jennifer Young, did witness the participants named above electronically sign this document.



