

Kentucky Power Company
KPSC Case No. 2022-00263
Commission Staff's First Set of Data Requests
Dated September 13, 2022

DATA REQUEST

1_1 For the period under review, provide the amount of coal purchased in tons and the percentage of purchases that were spot versus contract.

RESPONSE

Please see KPCO_R_KPSC_1_1_Attachment1 for the requested information. 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 backup filings, the term "spot purchase" is likewise defined for purposes of KPCO_R_KPSC_1_1_Attachment1 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 that used in by Staff in KPSC 1_2 (defining spot purchase as less than one year) and the accompanying response by Kentucky Power.

Witness: Kimberly K. Chilcote

Counterparty	Type of Purchase	Total Tons
ACNR Coal Sales, INC.	Contract	332,977
Alpha Metallurgical Coal Sales, LLC	Contract	67,353
Alpha Metallurgical Coal Sales, LLC	Contract	7,388
Alpha Metallurgical Coal Sales, LLC	Spot	13,892
Alpha Metallurgical Coal Sales, LLC	Spot	14,777
BAMM INC.	Contract	755
Blackhawk Coal Sales, LLC	Contract	12,196
Blackhawk Coal Sales, LLC	Contract	14,127
Case Coal Sales, LLC	Spot	3,284
Javelin Global Commodities (UK) Ltd	Spot	5,235
RFI Resources, LLC	Spot	15,585
River Trading Company	Spot	3,143

TOTAL	490,713
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Total Contract	89%
Total Spot	11%

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DATA REQUEST

- 1_2** For 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;
 - f. The tonnage requirement for the review period; and
 - g. Current price paid per ton.

RESPONSE

Please see KPCO_R_KPSC_1_2_Attachment1 for the requested information. 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_2_Attachment1 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 that used in by Staff (defining spot purchase as less than one year) and the accompanying response by Kentucky Power.

Witness: Kimberly K. Chilcote

This response is provided for the time period of November 1, 2021 through April 30, 2022 and lists all pertinent fuel contract information requested. Tonnage information is reported per Kentucky Power ownership share.

a.	b.	c.	d.	e.	f.	g.	
Contract/Purchase Order No.	Supplier Name	Location of Production Facilities	Method of Delivery	Tonnage Quantity Received During Review Period	Tonnage Quantity Requirement for Review Period	Current Price per Ton	
03-00-19-9M1	Alpha Metallurgical Coal Sales, LLC	Slab Camp, Black Castle, and Republic Mines - Kanawha, Boone, Raleigh, and Fayette Counties, WV	Barge	67,353	62,500	\$59.00	Note 1
03-00-21-9M2	Alpha Metallurgical Coal Sales, LLC	Slab Camp, Black Castle, and Republic Mines - Kanawha, Boone, Raleigh, and Fayette Counties, WV	Barge	7,388	5,000	\$55.75	Note 1
03-00-21-003	BAMM INC.	MATTCO Elkhorn 3, Barbourville, KY MRIME MET/ED, Pineville, WV	Barge	755	1,200	\$71.58	Note 1
03-00-18-010	Blackhawk Coal Sales, LLC	Blue Creek Mine, Kanawha, WV	Barge	12,196	12,000	\$65.00	Note 1
03-00-21-9M1	Blackhawk Coal Sales, LLC	Blue Creek Mine, Kanawha, WV	Barge	14,127	14,000	\$54.00	Note 1
07-77-05-900	ACNR Coal Sales, INC.	McElroy Mine, Marshall County, WV and Century Mine, Belmont/Monroe Counties, OH	Conveyor	332,977	356,422	\$42.16	Note 1

Note 1 KPCo and Seller agreed to non-ratable shipment volumes for the period

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DATA REQUEST

- 1_3** As of the last day of the review period:
- a. 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 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 excess inventory.
 - e. State whether any significant changes in the current coal inventory target are expected within the next 12 months. If so, state the expected change and the reasons for this change.

RESPONSE

a. As of April 30, 2022 Kentucky Power's actual coal inventory levels (Company share) were as follows:

Mitchell High Sulfur*: 186,301 tons 37 Days of Supply

Mitchell Low Sulfur*: 79,961 tons 30 Days of Supply

*Company share

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

Mitchell High Sulfur: 186,301 tons in storage as of 04/30/2022 = 37 days
4,985 (full load burn rate* - tons per day)

Mitchell Low Sulfur: 79,961 tons in storage as of 04/30/2022 = 30 days
2,680 (full load burn rate* - tons per day)

*Company share

c. As of April 30, 2022,

Mitchell High Sulfur:

Target Inventory - 15 Days

Actual Inventory Days - 37 Days

Days Over/(Under) Target - 22 Days

Mitchell Low Sulfur:

Target Inventory - 30 Days

Actual Inventory Days - 30 Days

Days Over/(Under) Target - (0) Days

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d. Not applicable.

e. No. Kentucky Power does not expect any significant changes in the coal inventory target for the Mitchell plant within the next 12 months.

Witness: Kimberly K. Chilcote

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DATA REQUEST

- 1_4** List each written coal supply solicitation issued during 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 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. Provide the bid tabulation sheet or corresponding document that ranked the proposals. (This document should 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

a. and b. Please refer to KPCO_R_KPSC_1_4_Attachment1 for the requested information concerning the Company's April 5, 2022 written coal-supply solicitations other than the offering vendors, analyses, and ranked proposals for the solicitation.

Please also refer to KPCO_R_KPSC_1_4_PUBLIC_Attachment2 (April 5, 2022 RFP) for information relating to the offering vendors, analyses, and ranked proposals.

Witness: Kimberly K. Chilcote

April 5, 2022 RFP

Low Sulfur Details

Date of Solicitation	April 5, 2022
Quantities Solicited (Tons)	Open Ended Volume
Type of Solicitation	Spot and Contract
Coal Heat Content (BTU/lb)	12,000
Sulfur (%)	1.00
Period(s) of Request	Bal 2022 2023 2024 2025
Applicable Generating Units	Mitchell Plant
Number of Vendors Solicited	Publically Posted and Emailed to over 65 contacts
Number of Vendor Responses	Bal 2022: 7 2023: 7 2024: 3 2025: 2
Number of Vendors Selected	Bal 2022: 1 ^{1,2,3} 2023: 1 ^{1,2,3} 2024: 0 ^{1,2} 2025: 1 ¹

High Sulfur Details

Date of Solicitation	April 5, 2022
Quantities Solicited (Tons)	Open Ended Volume
Type of Solicitation	Spot and Contract
Coal Heat Content (BTU/lb)	11,500
Sulfur (%)	2.88
Period(s) of Request	Bal 2022 2023 2024 2025
Applicable Generating Units	Mitchell Plant
Number of Vendors Solicited	Publically Posted and Emailed to over 65 contacts
Number of Vendor Responses	Bal 2022: 1 2023: 2 2024: 4 2025: 5
Number of Vendors Selected	Bal 2022: 0 ³ 2023: 0 ^{2,3} 2024: 1 ² 2025: 1 ²

¹ Offers from mines not currently in production
² Tons no longer available
³ Seller withdrew offer post RFP

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DATA REQUEST

- 1_5** List each oral coal supply solicitation issued during 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 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 selected. Provide the tabulation sheet or other document that ranks the proposals. (This document should 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 period under review.

Witness: Kimberly K. Chilcote

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DATA REQUEST

1_6 For 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).

RESPONSE

Please see KPCO_R_KPSC_1_06_Attachment1 for the requested information.

Witness: Clinton M. Stutler

Natural Gas Purchases
November 1, 2021 - April 30, 2022

Counterparty	Type of Purchase	Gross MMBTUs
DTE Energy Trading, Inc.	Spot	400
Arm Energy Management LLC	Spot	10,000
Mercuria Energy American, Inc.	Spot	108,000
Sequent Energy Management, L.P.	Spot	625,000
Snyder Brothers, Inc.	Spot	20,000
VITOL Inc.	Spot	360,100
EDF Trading North America, LLC	Spot	12,900
Macquarie Energy LLC	Spot	2,231,500
NextEra Energy Power Marketing, LLC	Spot	14,000

Grand Total	3,381,900
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Total Contract	0%
Total Spot	100%

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DATA REQUEST

1_7 For the period under review, state whether 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

During the period under review, there were no 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.

Witness: Clinton M. Stutler

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DATA REQUEST

1_8 State whether 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 used for generation since the previous FAC review.

Witness: Kimberly K. Chilcote

Witness: Clinton M. Stutler

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DATA REQUEST

- 1_9** State whether Kentucky Power has audited any of its fuel or transportation contracts during the period under review. If so, for each audited contract:
- a. Identify the contract;
 - b. Identify the auditor; and
 - c. State the results of the audit, and describe the actions that Kentucky Power took as a result of the audit.

RESPONSE

Kentucky Power has not audited any of its fuel or fuel transportation contracts during the period under review.

Witness: Kimberly K. Chilcote

Witness: Clinton M. Stutler

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DATA REQUEST

- 1_10**
- a. State whether Kentucky Power is currently involved in any litigation with its current or former fuel suppliers or transportation vendors. If so, 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 filed.
- b. State the current status of all litigation with suppliers or vendors.

RESPONSE

Kentucky Power is not currently involved in any litigation with current or former fuel suppliers or transportation vendors related to fuel or fuel transportation matters.

Witness: Kimberly K. Chilcote

Witness: Clinton M. Stutler

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DATA REQUEST

- 1_11**
- a. For the period under review, state whether there have been any changes to Kentucky Power's written policies and procedures regarding its fuel procurement. 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.
- b. If no, provide the date Kentucky Power's current fuel procurement policies and procedures were last changed, provide the date when they were last provided to the Commission, and identify the proceeding in which they were provided.

RESPONSE

- a) There have been no changes during the review period to Kentucky Power's written policies and procedures regarding its fuel procurement.
- b) The current fuel procurement policy was last modified in May 2018 and the corresponding changes were provided to the Commission in Case No. 2019-00002 on February 25, 2019.

Witness: Kimberly K. Chilcote

Witness: Clinton M. Stutler

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DATA REQUEST

1_12 For the period under review, list all firm power commitments for (a) purchases and (b) sales. This list shall identify the electric utility, the amount of commitment in megawatts, and the purpose of the commitment (i.e., peaking, emergency).

RESPONSE

a. During the review period Kentucky Power Company was committed to purchase 30% of AEG's 50% share of each Rockport unit, which aggregates to 393 MW for Kentucky Power. Kentucky Power is committed for the years 2021 and through December 7, 2022 to purchase the same 393 MW under the Rockport Unit Power Agreement.

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 actual peak load for the period November 2021 through April 2022. The cities use the power for load-following service to their citizens.

	November 2021 - April 2022
City of Olive Hill	5.3 MW
City of Vanceburg	12.2 MW

Witness: Scott E. Bishop

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DATA REQUEST

1_13 Provide a monthly billing summary of sales to all electric utilities for the period under review.

RESPONSE

Please see KPCO_R_KPSC_1_13_Attachment1 for the requested information. See KPCO_R_KPSC_1_13_Attachment2 for an explanation of the account numbers listed.

Witness: Scott E. Bishop

Tracking Code	Description
AMRX2	Amerex Power, Ltd
BPEC	B.P. Energy Company
CEI	Citigroup Energy Inc.
FESC	FirstEnergy Trading Services
MRETS	Midwest Renewable Energy
NASIA	Systems Integration Agreement
PJM	PJM Interconnection
PJME2	PJM Environmental Info Sys Inc.
PPLT2	PPL Electric Utilities Coporation
WELF2	Wells Fargo Securities, LLC

Pd	Year	Unit	Trkg Cd	Account	Revenue	KWH Metered
11	2021	117		4470006	(47.29)	-
11	2021	117	PJM	4470006	34,305.43	570,802
11	2021	117	FESC	4470006	16,914.03	410,000
11	2021	117	PPLT2	4470006	84,136.50	1,934,000
				4470006 Total	135,308.67	2,914,802
11	2021	117	PJM	4470010	(7.25)	-
11	2021	117	PJM	4470010	(0.52)	-
11	2021	117	PJM	4470010	(0.28)	-
11	2021	117	PJM	4470010	0.03	-
11	2021	117	PJM	4470010	(0.49)	-
11	2021	117	PJM	4470010	(33,209.96)	(407,641)
11	2021	117	PJM	4470010	(9.73)	-
11	2021	117	PJM	4470010	(5.58)	-
11	2021	117	PJM	4470010	(1.31)	-
11	2021	117	PJM	4470010	(125,929.05)	(1,920,676)
11	2021	117	BPEC	4470010	(13,185.50)	(571,000)
				4470010 Total	(172,349.64)	(2,899,317)
11	2021	117	CEI	4470082	(15,007.80)	-
11	2021	117	WELF2	4470082	33,536.35	-
11	2021	117	WELF2	4470082	(452.54)	-
				4470082 Total	18,076.01	-
11	2021	117	PJM	4470089	(23,347.63)	-
				4470089 Total	(23,347.63)	-
11	2021	117	PJM	4470098	(1,796.54)	-
				4470098 Total	(1,796.54)	-
11	2021	117	PJM	4470099	468,436.81	-
				4470099 Total	468,436.81	-
11	2021	117	PJM	4470100	1,243.33	-
				4470100 Total	1,243.33	-
11	2021	117	PJM	4470103	692,627.65	12,028,066
				4470103 Total	692,627.65	12,028,066
11	2021	117	PJM	4470110	0.05	-
				4470110 Total	0.05	-
11	2021	117	PJM	4470115	375.28	-
				4470115 Total	375.28	-
11	2021	117	PJM	4470126	(4,316.40)	-
				4470126 Total	(4,316.40)	-
11	2021	117	PJM	4470131	(0.07)	-
11	2021	117	PJM	4470131	(0.03)	-
				4470131 Total	(0.10)	-
11	2021	117	WELF2	4470143	288.22	-
				4470143 Total	288.22	-
11	2021	117	NASIA	4470175	(190,625.56)	-
11	2021	117	NASIA	4470175	1,565.21	-
				4470175 Total	(189,060.35)	-

Pd	Year	Unit	Trkg Cd	Account	Revenue	KWH Metered
11	2021	117	NASIA	4470176	190,625.56	-
11	2021	117	NASIA	4470176	(1,565.21)	-
				4470176 Total	189,060.35	-
11	2021	117	PJM	4470206	(28.73)	-
				4470206 Total	(28.73)	-
11	2021	117	PJM	4470209	149.14	-
				4470209 Total	149.14	-
11	2021	117	PJM	4470215	5.65	-
				4470215 Total	5.65	-
11	2021	117	PJM	4470220	139,150.52	-
				4470220 Total	139,150.52	-
11	2021	117	PJM	5550039	129.31	-
				5550039 Total	129.31	-
11	2021	110	AMRX2	5570007	(31.13)	(3,459)
11	2021	110	PJME2	5570007	(5.83)	(1,457)
				5570007 Total	(36.96)	(4,916)
11	2021	117	PJM	5614000	-	-
11	2021	117	PJM	5614000	(1,383.66)	-
				5614000 Total	(1,383.66)	-
11	2021	180	PJM	5614008	-	-
				5614008 Total	-	-
11	2021	117	PJM	5618000	-	-
11	2021	117	PJM	5618000	(603.52)	-
11	2021	117	PJM	5618000	(5.54)	-
				5618000 Total	(609.06)	-
11	2021	117	PJM	5757000	-	-
11	2021	117	PJM	5757000	(1,691.88)	-
11	2021	117	PJM	5757000	(105.30)	-
				5757000 Total	(1,797.18)	-
				November Total	1,250,124.74	12,038,635

Pd	Year	Unit	Trkg Cd	Account	Revenue	KWH Metered
12	2021	117		4470006	(29.83)	-
12	2021	117	NASIA	4470006	-	-
12	2021	117	PJM	4470006	19,458.73	557,459
12	2021	117	FESC	4470006	22,434.59	543,000
12	2021	117	PPLT2	4470006	(48.40)	(2,000)
				4470006 Total	41,815.09	1,098,459
12	2021	117	PJM	4470010	(0.01)	-
12	2021	117	PJM	4470010	(0.09)	-
12	2021	117	PJM	4470010	(0.07)	-
12	2021	117	PJM	4470010	1.27	-
12	2021	117	PJM	4470010	4.01	-
12	2021	117	PJM	4470010	(26,557.88)	(508,640)
12	2021	117	PJM	4470010	(9.78)	-
12	2021	117	PJM	4470010	(6.14)	-
12	2021	117	PJM	4470010	(0.17)	-
12	2021	117	PJM	4470010	6,649.62	(11,662)
12	2021	117	PJM	4470010	(313.49)	-
12	2021	117	BPEC	4470010	(12,877.27)	(557,000)
				4470010 Total	(33,110.00)	(1,077,302)
12	2021	117	CEI	4470082	(616.60)	-
12	2021	117	WELF2	4470082	(12,628.09)	-
12	2021	117	WELF2	4470082	(501.94)	-
				4470082 Total	(13,746.63)	-
12	2021	117	NASIA	4470089	-	-
12	2021	117	PJM	4470089	62,182.71	-
				4470089 Total	62,182.71	-
12	2021	117	NASIA	4470098	-	-
12	2021	117	PJM	4470098	(1,017.36)	-
				4470098 Total	(1,017.36)	-
12	2021	117	NASIA	4470099	-	-
12	2021	117	PJM	4470099	438,214.48	-
				4470099 Total	438,214.48	-
12	2021	117	NASIA	4470100	-	-
12	2021	117	PJM	4470100	8,510.38	-
				4470100 Total	8,510.38	-
12	2021	117	NASIA	4470103	-	-
12	2021	117	PJM	4470103	1,163,398.85	36,661,629
				4470103 Total	1,163,398.85	36,661,629
12	2021	117	PJM	4470110	0.01	-
				4470110 Total	0.01	-
12	2021	117	NASIA	4470115	-	-
12	2021	117	PJM	4470115	488.64	-
				4470115 Total	488.64	-
12	2021	117	PJM	4470126	2,867.81	-
				4470126 Total	2,867.81	-
12	2021	117	WELF2	4470143	5,588.06	-
				4470143 Total	5,588.06	-
12	2021	117	NASIA	4470175	(70,026.95)	-
12	2021	117	NASIA	4470175	(61.68)	-
				4470175 Total	(70,088.63)	-
12	2021	117	NASIA	4470176	70,026.95	-
12	2021	117	NASIA	4470176	61.68	-
				4470176 Total	70,088.63	-

Pd	Year	Unit	Trkg Cd	Account	Revenue	KWH Metered
12	2021	117	PJM	4470206	1,797.71	-
				4470206 Total	1,797.71	-
12	2021	117	PJM	4470209	(8,938.37)	-
				4470209 Total	(8,938.37)	-
12	2021	117	NASIA	4470214	-	-
12	2021	117	PJM	4470214	163.51	-
				4470214 Total	163.51	-
12	2021	117	NASIA	4470215	-	-
12	2021	117	PJM	4470215	(106.88)	-
				4470215 Total	(106.88)	-
12	2021	117	NASIA	4470220	-	-
12	2021	117	PJM	4470220	109,555.61	-
				4470220 Total	109,555.61	-
12	2021	117	NASIA	4470221	-	-
12	2021	117	PJM	4470221	1,599.51	-
				4470221 Total	1,599.51	-
12	2021	117	NASIA	4470222	-	-
				4470222 Total	-	-
12	2021	117	PJM	5550039	96.34	-
				5550039 Total	96.34	-
12	2021	110	PJME2	5570007	(5.41)	(1,352)
				5570007 Total	(5.41)	(1,352)
12	2021	117	PJM	5614000	-	-
12	2021	117	PJM	5614000	(4,283.41)	-
				5614000 Total	(4,283.41)	-
12	2021	117	PJM	5614008	(4,112.75)	-
12	2021	180	PJM	5614008	-	-
				5614008 Total	(4,112.75)	-
12	2021	117	PJM	5618000	-	-
12	2021	117	PJM	5618000	(1,249.30)	-
12	2021	117	PJM	5618000	(11.22)	-
				5618000 Total	(1,260.52)	-
12	2021	117	PJM	5757000	-	-
12	2021	117	PJM	5757000	(4,149.28)	-
12	2021	117	PJM	5757000	(213.18)	-
				5757000 Total	(4,362.46)	-
				December Total	1,765,334.92	36,681,434

Pd	Year	Unit	Trkg Cd	Account	Revenue	KWH Metered
1	2022	117	PJM	4470006	-	-
1	2022	117	FESC	4470006	30,284.11	734,000
1	2022	117	PPLT2	4470006	(42.32)	(1,000)
				4470006 Total	30,241.79	733,000
1	2022	117	PJM	4470010	0.01	-
1	2022	117	PJM	4470010	0.09	-
1	2022	117	PJM	4470010	0.11	-
1	2022	117	PJM	4470010	(51,673.20)	(767,376)
1	2022	117	PJM	4470010	(9.19)	-
1	2022	117	PJM	4470010	(6.88)	-
1	2022	117	PJM	4470010	0.16	-
1	2022	117	PJM	4470010	29,452.78	976
1	2022	117	BPEC	4470010	-	-
				4470010 Total	(22,236.12)	(766,400)
1	2022	117	CEI	4470082	(791.35)	-
1	2022	117	WELF2	4470082	33,787.54	-
1	2022	117	WELF2	4470082	-	-
				4470082 Total	32,996.19	-
1	2022	117	PJM	4470089	(290,385.72)	-
				4470089 Total	(290,385.72)	-
1	2022	117	PJM	4470098	(4,557.96)	-
				4470098 Total	(4,557.96)	-
1	2022	117	PJM	4470099	498,657.16	-
				4470099 Total	498,657.16	-
1	2022	117	PJM	4470100	153,667.55	-
				4470100 Total	153,667.55	-
1	2022	117	PJM	4470103	5,666,089.37	82,193,232
				4470103 Total	5,666,089.37	82,193,232
1	2022	117	PJM	4470115	5,135.92	-
				4470115 Total	5,135.92	-
1	2022	117	PJM	4470126	(173,414.14)	-
				4470126 Total	(173,414.14)	-
1	2022	117	WELF2	4470143	(114,714.02)	-
				4470143 Total	(114,714.02)	-
1	2022	117	NASIA	4470175	(237,688.21)	-
1	2022	117	NASIA	4470175	(14,569.33)	-
				4470175 Total	(252,257.54)	-

Pd	Year	Unit	Trkg Cd	Account	Revenue	KWH Metered
1	2022	117	NASIA	4470176	237,688.21	-
1	2022	117	NASIA	4470176	14,569.33	-
				4470176 Total	252,257.54	-
1	2022	117	PJM	4470206	19,403.82	-
				4470206 Total	19,403.82	-
1	2022	117	PJM	4470209	(62,049.40)	-
				4470209 Total	(62,049.40)	-
1	2022	117	PJM	4470214	33.55	-
				4470214 Total	33.55	-
1	2022	117	PJM	4470215	(21.82)	-
				4470215 Total	(21.82)	-
1	2022	117	PJM	4470220	385,072.14	-
				4470220 Total	385,072.14	-
1	2022	117	PJM	4470221	630.39	-
				4470221 Total	630.39	-
1	2022	117	PJM	5550039	(450.03)	-
				5550039 Total	(450.03)	-
1	2022	110	MRETS	5570007	(217.44)	-
1	2022	110	PJME2	5570007	(7.74)	(1,935)
				5570007 Total	(225.18)	(1,935)
1	2022	117	PJM	5614000	-	-
1	2022	117	PJM	5614000	(1,193.42)	-
				5614000 Total	(1,193.42)	-
1	2022	180	PJM	5614008	-	-
				5614008 Total	-	-
1	2022	117	PJM	5618000	-	-
1	2022	117	PJM	5618000	(2,727.06)	-
1	2022	117	PJM	5618000	(0.36)	-
				5618000 Total	(2,727.42)	-
1	2022	117	PJM	5757000	-	-
1	2022	117	PJM	5757000	(5,920.61)	-
1	2022	117	PJM	5757000	(6.84)	-
				5757000 Total	(5,927.45)	-
				January Total	6,114,025.20	82,157,897

Pd	Year	Unit	Trkg Cd	Account	Revenue	KWH Metered
2	2022	117	PJM	4470006	(16.06)	-
2	2022	117	FESC	4470006	26,180.35	635,000
2	2022	117	PPLT2	4470006	-	-
				4470006 Total	26,164.29	635,000
2	2022	117	PJM	4470010	(8.10)	-
2	2022	117	PJM	4470010	(8.24)	-
2	2022	117	PJM	4470010	(0.13)	-
2	2022	117	PJM	4470010	(8.59)	-
2	2022	117	PJM	4470010	(42,009.10)	(634,576)
2	2022	117	PJM	4470010	(49.16)	-
2	2022	117	PJM	4470010	(46.46)	-
2	2022	117	PJM	4470010	(8.56)	-
2	2022	117	PJM	4470010	8,852.67	(4)
2	2022	117	PJM	4470010	(25.42)	-
				4470010 Total	(33,311.09)	(634,580)
2	2022	117	CEI	4470082	(249.76)	-
2	2022	117	WELF2	4470082	27,080.96	-
				4470082 Total	26,831.20	-
2	2022	117	PJM	4470089	(40,511.34)	-
				4470089 Total	(40,511.34)	-
2	2022	117	PJM	4470098	(4,990.77)	-
				4470098 Total	(4,990.77)	-
2	2022	117	PJM	4470099	423,102.86	-
				4470099 Total	423,102.86	-
2	2022	117	PJM	4470100	16,642.68	-
				4470100 Total	16,642.68	-
2	2022	117	PJM	4470103	1,115,229.50	25,936,543
				4470103 Total	1,115,229.50	25,936,543
2	2022	117	PJM	4470110	(0.01)	-
				4470110 Total	(0.01)	-
2	2022	117	PJM	4470115	8,979.35	-
				4470115 Total	8,979.35	-
2	2022	117	PJM	4470126	(20,669.88)	-
				4470126 Total	(20,669.88)	-
2	2022	117	WELF2	4470143	427.75	-
				4470143 Total	427.75	-
2	2022	117	NASIA	4470175	(295,517.00)	-
2	2022	117	NASIA	4470175	(135.03)	-
				4470175 Total	(295,652.03)	-
2	2022	117	NASIA	4470176	295,517.00	-
2	2022	117	NASIA	4470176	135.03	-
				4470176 Total	295,652.03	-
2	2022	117	PJM	4470206	6,116.84	-
				4470206 Total	6,116.84	-
2	2022	117	PJM	4470209	(10,650.49)	-
				4470209 Total	(10,650.49)	-
2	2022	117	PJM	4470214	3.09	-
				4470214 Total	3.09	-
2	2022	117	PJM	4470215	5.76	-
				4470215 Total	5.76	-
2	2022	117	PJM	4470220	220,015.43	-
				4470220 Total	220,015.43	-
2	2022	117	PJM	4470221	0.91	-
				4470221 Total	0.91	-
2	2022	117	PJM	5550039	157.47	-
				5550039 Total	157.47	-

Pd	Year	Unit	Trkg Cd	Account	Revenue	KWH Metered
2	2022	117	PJM	5614000	-	-
2	2022	117	PJM	5614000	(15,075.31)	-
				5614000 Total	(15,075.31)	-
2	2022	180	PJM	5614008	-	-
				5614008 Total	-	-
2	2022	117	PJM	5618000	-	-
2	2022	117	PJM	5618000	(3,302.79)	-
2	2022	117	PJM	5618000	(20.17)	-
				5618000 Total	(3,322.96)	-
2	2022	117	PJM	5757000	-	-
2	2022	117	PJM	5757000	(10,570.94)	-
2	2022	117	PJM	5757000	(797.42)	-
				5757000 Total	(11,368.36)	-
				February Total	1,703,776.92	25,936,963

Pd	Year	Unit	Trkg Cd	Account	Revenue	KWH Metered
3	2022	117	FESC	4470006	26,061.48	631,000
				4470006 Total	26,061.48	631,000
3	2022	117	PJM	4470010	(7.93)	-
3	2022	117	PJM	4470010	(7.85)	-
3	2022	117	PJM	4470010	(7.86)	-
3	2022	117	PJM	4470010	(8.29)	-
3	2022	117	PJM	4470010	(39,720.38)	(631,129)
3	2022	117	PJM	4470010	(49.65)	-
3	2022	117	PJM	4470010	(47.19)	-
3	2022	117	PJM	4470010	(7.74)	-
3	2022	117	PJM	4470010	903.43	-
3	2022	117	PJM	4470010	(24.92)	-
				4470010 Total	(38,978.38)	(631,129)
3	2022	117	CEI	4470082	325.09	-
3	2022	117	WELF2	4470082	19,434.75	-
				4470082 Total	19,759.84	-
3	2022	117	PJM	4470089	(25,314.94)	-
				4470089 Total	(25,314.94)	-
3	2022	117	PJM	4470098	(544.19)	-
				4470098 Total	(544.19)	-
3	2022	117	PJM	4470099	468,435.35	-
				4470099 Total	468,435.35	-
3	2022	117	PJM	4470100	10,252.21	-
				4470100 Total	10,252.21	-
3	2022	117	PJM	4470103	539,648.38	13,333,319
				4470103 Total	539,648.38	13,333,319
3	2022	117	PJM	4470115	9,939.77	-
				4470115 Total	9,939.77	-
3	2022	117	PJM	4470126	(1,334.43)	-
				4470126 Total	(1,334.43)	-
3	2022	117	WELF2	4470143	-	-
				4470143 Total	-	-
3	2022	117	NASIA	4470175	(208,656.10)	-
3	2022	117	NASIA	4470175	(1,869.53)	-
				4470175 Total	(210,525.63)	-
3	2022	117	NASIA	4470176	208,656.10	-
3	2022	117	NASIA	4470176	1,869.53	-
				4470176 Total	210,525.63	-
3	2022	117	PJM	4470206	5,147.57	-
				4470206 Total	5,147.57	-
3	2022	117	PJM	4470209	(5,292.06)	-
				4470209 Total	(5,292.06)	-
3	2022	117	PJM	4470215	1.15	-
				4470215 Total	1.15	-
3	2022	117	PJM	4470220	19,738.94	-
				4470220 Total	19,738.94	-
3	2022	117	PJM	5550039	87.63	-
				5550039 Total	87.63	-
3	2022	117	PJM	5614000	-	-
3	2022	117	PJM	5614000	(2,211.04)	-
				5614000 Total	(2,211.04)	-

Pd	Year	Unit	Trkg Cd	Account	Revenue	KWH Metered
3	2022	117	PJM	5614008	(4,112.75)	-
3	2022	180	PJM	5614008	-	-
				5614008 Total	(4,112.75)	-
3	2022	117	PJM	5618000	-	-
3	2022	117	PJM	5618000	(391.28)	-
				5618000 Total	(391.28)	-
3	2022	117	PJM	5757000	-	-
3	2022	117	PJM	5757000	(817.74)	-
3	2022	117	PJM	5757000	(377.74)	-
				5757000 Total	(1,195.48)	-
				March Total	1,019,697.77	13,333,190

Pd	Year	Unit	Trkg Cd	Account	Revenue	KWH Metered
4	2022	117	NASIA	4470006	-	-
4	2022	117	FESC	4470006	23,197.91	565,000
				4470006 Total	23,197.91	565,000
4	2022	117	PJM	4470010	(7.47)	-
4	2022	117	PJM	4470010	(7.48)	-
4	2022	117	PJM	4470010	(7.53)	-
4	2022	117	PJM	4470010	(47,911.84)	(566,062)
4	2022	117	PJM	4470010	(57.68)	-
4	2022	117	PJM	4470010	(55.05)	-
4	2022	117	PJM	4470010	(7.55)	-
4	2022	117	PJM	4470010	710.10	-
4	2022	117	PJM	4470010	(27.90)	-
				4470010 Total	(47,372.40)	(566,062)
4	2022	117	CEI	4470082	(197.45)	-
4	2022	117	WELF2	4470082	34,785.32	-
				4470082 Total	34,587.87	-
4	2022	117	NASIA	4470089	-	-
4	2022	117	PJM	4470089	897,480.61	-
				4470089 Total	897,480.61	-
4	2022	117	NASIA	4470098	-	-
4	2022	117	PJM	4470098	(4,476.31)	-
				4470098 Total	(4,476.31)	-
4	2022	117	NASIA	4470099	-	-
4	2022	117	PJM	4470099	453,327.64	-
				4470099 Total	453,327.64	-
4	2022	117	NASIA	4470100	-	-
4	2022	117	PJM	4470100	36,124.97	-
				4470100 Total	36,124.97	-
4	2022	117	NASIA	4470103	-	-
4	2022	117	PJM	4470103	3,992,643.31	69,443,473
				4470103 Total	3,992,643.31	69,443,473
4	2022	117	PJM	4470110	(0.01)	-
				4470110 Total	(0.01)	-
4	2022	117	NASIA	4470115	-	-
4	2022	117	PJM	4470115	803.40	-
				4470115 Total	803.40	-
4	2022	117	PJM	4470126	71,995.67	-
				4470126 Total	71,995.67	-
4	2022	117	NASIA	4470175	4,202,447.84	-
4	2022	117	NASIA	4470175	10,301.33	-
				4470175 Total	4,212,749.17	-
4	2022	117	NASIA	4470176	(4,202,447.84)	-
4	2022	117	NASIA	4470176	(10,301.33)	-
				4470176 Total	(4,212,749.17)	-
4	2022	117	PJM	4470206	3,960.00	-
				4470206 Total	3,960.00	-
4	2022	117	PJM	4470209	(39,170.06)	-
				4470209 Total	(39,170.06)	-
4	2022	117	NASIA	4470214	-	-
4	2022	117	PJM	4470214	92.91	-
				4470214 Total	92.91	-
4	2022	117	NASIA	4470215	-	-
4	2022	117	PJM	4470215	(66.90)	-
				4470215 Total	(66.90)	-

Pd	Year	Unit	Trkg Cd	Account	Revenue	KWH Metered
4	2022	117	NASIA	4470220	-	-
4	2022	117	PJM	4470220	496,357.73	-
				4470220 Total	496,357.73	-
4	2022	117	NASIA	4470221	-	-
4	2022	117	PJM	4470221	653.59	-
				4470221 Total	653.59	-
4	2022	117	PJM	5550039	722.85	-
				5550039 Total	722.85	-
4	2022	117	PJM	5614000	-	-
4	2022	117	PJM	5614000	(14,515.20)	-
				5614000 Total	(14,515.20)	-
4	2022	180	PJM	5614008	-	-
				5614008 Total	-	-
4	2022	117	PJM	5618000	-	-
4	2022	117	PJM	5618000	(3,969.02)	-
				5618000 Total	(3,969.02)	-
4	2022	117	PJM	5757000	-	-
4	2022	117	PJM	5757000	(9,045.28)	-
4	2022	117	PJM	5757000	(490.29)	-
				5757000 Total	(9,535.57)	-
				April Total	5,892,842.99	69,442,411
				Grand Total	17,745,802.54	239,590,530

<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.

Kentucky Power Company
KPSC Case No. 2022-00263
Commission Staff's First Set of Data Requests
Dated September 13, 2022

DATA REQUEST

- 1_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: Scott E. Bishop

Kentucky Power Company
KPSC Case No. 2022-00263
Commission Staff's First Set of Data Requests
Dated September 13, 2022

DATA REQUEST

1_15 Provide a list, in chronological order, showing by unit any scheduled, actual, and forced outages for the period under review.

RESPONSE

Please see KPCO_R_KPSC_1_15_Attachment1 for the requested information.

Witness: Paul J. Massie

Witness: Douglas J. Rosenberger

Kentucky Power Company
Fuel Adjustment Case No. 2022-00263
Generating Unit Outages
November 1, 2021-April 30, 2022

Unit Name	Event Type *	Event Start	Event End	Event Description
Big Sandy 1	PO	10/8/21 10:00 PM	12/21/21 7:47 AM	GBIR, Turbine Exhaust High Energy Piping (HEP) inspections, Boiler corrosion fatigue inspections, and Cooling Tower repairs.
Big Sandy 1	RS	12/21/21 7:47 AM	12/22/21 6:48 AM	Reserve Shutdown
Big Sandy 1	FO	1/19/22 3:11 AM	1/19/22 10:01 PM	Deaerator Valve RV-101 failed open
Big Sandy 1	MO	2/10/22 12:25 AM	2/18/22 3:00 PM	Boiler i/r, Vibration Probe i/r, RV-101 (Hotwell level control) repair, RV-5 (Start-up Steam Attemperator Valve) i/r, Nash Vacuum Pump i/r, #5 HP Heater Feedwater Header leak repair.
Big Sandy 1	RS	2/18/22 3:00 PM	2/19/22 7:44 AM	Reserve Shutdown
Big Sandy 1	MO	2/22/22 12:58 AM	2/27/22 11:55 AM	Maintenance Outage for Boiler inspection, Drum door repairs, BFPT Y vibration probe repair, Clean cooling tower screens, Nash pump level float repair, Circulating water vent replacement.
Big Sandy 1	RS	2/27/22 11:55 AM	3/9/22 4:42 AM	Reserve Shutdown
Big Sandy 1	RS	3/16/22 1:06 AM	3/17/22 12:00 AM	Reserve Shutdown
Big Sandy 1	MO	3/17/22 12:00 AM	3/27/22 12:00 PM	Boiler i/r, State Drum inspection, BFPT 2Y vibration probe repair, BFPT Gasket replacement on Duplex Strainer, Boiler Penthouse inspection
Big Sandy 1	RS	3/27/22 12:00 PM	3/28/22 7:58 AM	Reserve Shutdown
Big Sandy 1	MO	3/30/22 1:27 AM	4/5/22 6:56 AM	Boiler I/R, Aux Feed Pump #1 Cylinder repack, Drip Receiver leak repair (weld)
Big Sandy 1	RS	4/5/22 6:56 AM	4/5/22 7:55 PM	Reserve Shutdown
Big Sandy 1	FO	4/6/22 4:42 AM	4/8/22 4:00 PM	Condenser leak during startup, removed unit from service due to cycle water contamination
Big Sandy 1	MO	4/8/22 4:00 PM	4/14/22 1:40 PM	Boiler Drum door repairs
Big Sandy 1	RS	4/14/22 1:40 PM	4/15/22 5:14 AM	Reserve Shutdown
Mitchell 1	PO	10/16/21 12:00 AM	12/12/21 1:31 PM	Boiler i/r, Balance of Plant (BOP) repairs, SCR Catalyst #4 layer replacement, Boiler Feed Pump Element replacement.
Mitchell 1	RS	12/12/21 1:31 PM	12/19/21 7:00 AM	Reserve Shutdown
Mitchell 1	MO	12/19/21 7:00 AM	12/23/21 8:32 AM	To dewater cooling tower and install 11B Circulating Water Pump
Mitchell 1	RS	12/23/21 8:32 AM	1/9/22 6:57 AM	Reserve Shutdown
Mitchell 1	MO	1/31/22 1:06 AM	2/11/22 2:00 AM	Inspect and repair #11 ID Fan due to internal oil leak associated with the fan.
Mitchell 1	RS	2/11/22 2:00 AM	2/11/22 7:50 AM	Reserve Shutdown
Mitchell 1	FO	2/11/22 7:50 AM	2/16/22 11:05 AM	Condenser tube leak developed during startup
Mitchell 1	RS	2/16/22 11:05 AM	3/9/22 7:00 AM	Reserve Shutdown
Mitchell 1	MO	3/9/22 7:00 AM	3/12/22 12:29 AM	Boiler i/r, Upper Cooling Water Cooler i/r, #12 Stator Water Pump i/r (parts finally arrived to address a liability on the pump).
Mitchell 1	RS	3/12/22 12:29 AM	3/24/22 1:00 PM	Reserve Shutdown
Mitchell 1	FO	3/24/22 1:00 PM	3/27/22 3:41 AM	Aux. Boiler unavailable due to casing failure.
Mitchell 1	FO	3/27/22 11:00 AM	3/29/22 4:30 PM	#16 Pulverizer Primary Air Ductwork failed near Primary Air Damper.
Mitchell 1	RS	3/29/22 4:30 PM	4/5/22 1:30 PM	Reserve Shutdown
Mitchell 1	SF	4/5/22 1:30 PM	4/5/22 3:24 PM	Unit failed to meet start timeline due to delays, original // time 0930
Mitchell 1	FO	4/13/22 5:24 PM	4/14/22 2:25 PM	Extreme low deaerator alarm due to CRV-301 (deaerator level control valve) positioner problem and valve problem.

Unit Name	Event Type *	Event Start	Event End	Event Description
Mitchell 1	MO	4/14/22 2:26 PM	4/19/22 11:00 PM	Deaerator Level control valve (CRV-301) i/r; Boiler casing air test; Boiler i/r; Repair EHC leak on Reheat stop valve; Main Turbine 1st Reheat and HP Exhaust Steam Leads.
Mitchell 1	RS	4/19/22 11:00 PM	4/24/22 9:31 PM	Reserve Shutdown
Mitchell 2	MO	10/22/21 12:00 AM	11/6/21 9:54 AM	Boiler i/r, UMO-803 (Motor operated valve for flash tank steam to #8 high HP heaters) i/r motor operator failed, Dry Fly Ash System repairs, FGD repairs, FMO-101 (Motor operated main steam attemperator bypass valve) valve packing failed i/r, #1 Turbine Control Valve EHC oil hydraulic line leak i/r.
Mitchell 2	RS	11/6/21 9:54 AM	11/13/21 7:44 AM	Reserve Shutdown
Mitchell 2	FO	11/13/21 7:44 AM	11/15/21 1:00 AM	Turbine Above Seat Steam Lead Drain Line Leak developed during startup
Mitchell 2	SF	11/15/21 1:00 AM	11/15/21 2:29 AM	AC ground associated with exciter during startup
Mitchell 2	FO	11/30/21 11:30 AM	12/2/21 5:38 AM	Valve issue. Packing blew out on FRV-101(Main Steam Attemperator Valve)
Mitchell 2	FO	12/4/21 8:00 AM	12/5/21 10:19 AM	UMO-1 (boiler superheater bypass valve) packing leak developed during startup
Mitchell 2	FO	12/22/21 12:18 AM	12/22/21 4:18 PM	#1 Turbine Control valve LVDT positioner arm broke causing #1 control valve to close and become inoperable
Mitchell 2	MO	2/20/22 7:45 PM	3/26/22 5:00 AM	Boiler i/r, Boiler Hydro test, Precipitator i/r, Boiler Roof Outlet Header SV-54 (safety valve) replacement, Deaerator leak repair, Drain FGD Absorber to replace 2H Agitator Seal, FGD Absorber Inlet Duct repairs, repair RH Attemperator Block Valves FMO-201 and 202 (Water Induction Protection Valves).
Mitchell 2	RS	3/26/22 5:00 AM	4/15/22 10:45 AM	Reserve Shutdown
Mitchell 2	FO	4/15/22 4:03 PM	4/16/22 5:07 AM	During startup pressurization, Super heater bypass valves failed to respond causing the unit to trip on sub critical pressure trip.
Mitchell 2	RS	4/30/22 1:49 AM	5/22/22 6:06 AM	Reserve Shutdown

Event Type *

FO Forced Outage
 MO Maintenance Outage
 PO Planned Outage
 RS Reserve Shutdown
 SF Startup Failure
 Note: i/r = inspection and repair

Kentucky Power Company
KPSC Case No. 2022-00263
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Dated September 13, 2022

DATA REQUEST

1_16 For the period under review, provide the monthly supporting peaking unit equivalent calculations in electronic Excel spreadsheet format with all formulas, columns, and rows unprotected and visible supporting the forced outage calculations. In addition, provide the corresponding amount, if any, of forced outage purchased power collected through the purchase power adjustment tariff.

RESPONSE

Please see KPCO_R_KPSC_1_16_Attachment1 through KPCO_R_KPSC_1_16_Attachment6 for the requested calculations. The amount of purchased power associated with forced outages that is excluded from recovery in the FAC and recovered through the Purchased Power Adjustment Tariff is identified in the first tab of each attachment at the bottom of Column 16, which is labeled TOTAL FO REPLACEMENT COST EXCLUDED FROM FAC.

Witness: Jason M. Stegall

Kentucky Power Company
KPSC Case No. 2022-00263
Commission Staff's First Set of Data Requests
Dated September 13, 2022

DATA REQUEST

1_17 For the period under review, provide the monthly capacity factor at which each generating unit operated.

RESPONSE

Please see KPCO_R_KPSC_1_17_Attachment1 for the requested information.

Included in KPCO_R_KPSC_1_17_Attachment1 is the Generating Unit Equivalent Availability Factor (EAF). The EAF is the percent of time the generating units are available for operation without any outages or equipment deratings during the time period.

Witness: Paul J. Massie

Witness: Douglas J. Rosenberger

Kentucky Power Company						
Fuel Adjustment Case No. 2022-00263						
Generating Unit Net Capacity Factor [%]						
November 1, 2021-April 30, 2022						
	Nov-21	Dec-21	Jan-22	Feb-22	Mar-22	Apr-22
Big Sandy 1	0.00	15.31	76.04	17.18	12.71	26.52
Mitchell 1	0.00	0.00	37.70	0.00	0.08	24.47
Mitchell 2	29.93	63.42	55.82	38.96	0.00	23.59

Kentucky Power Company						
Fuel Adjustment Case No. 2022-00263						
Generating Unit Equivalent Availability Factor [%]						
November 1, 2021-April 30, 2022						
	Nov-21	Dec-21	Jan-22	Feb-22	Mar-22	Apr-22
Big Sandy 1	0.00	34.44	94.68	48.28	59.42	57.60
Mitchell 1	0.00	42.25	88.69	45.65	75.55	77.72
Mitchell 2	71.27	79.76	80.27	45.96	18.71	90.52

Kentucky Power Company
KPSC Case No. 2022-00263
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DATA REQUEST

1_18 For the period under review, explain whether 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. If so, describe the impact of these changes on Kentucky Power's fuel usage.

RESPONSE

The Company did not make any changes to its maintenance and operation practices, nor did it complete any specific generation efficiency improvements that affect fuel usage at Kentucky Power's generation facilities under the review period.

Witness: Paul J. Massie

Witness: Douglas J. Rosenberger

Kentucky Power Company
KPSC Case No. 2022-00263
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Dated September 13, 2022

DATA REQUEST

1_19 State whether Kentucky Power is aware of any violations of its policies and procedures regarding fuel procurement that occurred prior to or during the period under review.

RESPONSE

Kentucky Power is not aware of any violations of its policies and procedures regarding fuel procurement that occurred prior to or during the review period.

Witness: Kimberly K. Chilcote

Witness: Clinton M. Stutler

Kentucky Power Company
KPSC Case No. 2022-00263
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DATA REQUEST

1_20 State whether Kentucky Power is aware of any violations of 807 KAR 5:056 that occurred prior to or during the period under review.

RESPONSE

The Company is not aware of any such violations.

Witness: Scott E. Bishop

Kentucky Power Company
KPSC Case No. 2022-00263
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DATA REQUEST

1_21 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 such contracts have been filed with the Commission.

Witness: Scott E. Bishop

Kentucky Power Company
KPSC Case No. 2022-00263
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DATA REQUEST

1_22

Refer to KRS 278.277(1) which states that:

In any review by the commission of any fuel adjustment clause, for any contracts entered into on or after July 1, 2021, the commission shall, in determining the reasonableness of fuel costs in procurement contracts and fuel procurement practices, evaluate the reasonableness of fuel costs in contracts and competing bids based on the cost of the fuel less any coal severance tax imposed by any jurisdiction.

- a. Provide a listing of any new coal contracts entered into on or since November 1, 2021.
- b. For each bid solicitation or potential spot purchase that resulted in a new purchase contract on or after November 1, 2021, provide the bid evaluation sheets that include:
 - (1) The coal severance tax rate being levied, if any;
 - (2) The coal severance tax rate per ton or MMBTU, as appropriate, being levied;
 - (3) The cost per ton or MMBTU, as appropriate, including any severance tax; and
 - (4) The cost per ton or MMBTU, as appropriate, excluding any severance tax.

RESPONSE

a. and b. Please see KPCO_R_KPSC_1_22_Attachment_1 for the agreements entered into after November 1, 2021, which are a result of the RFP's issued by the Company on April 5, 2022.

Witness: Kimberly K. Chilcote

Kentucky Power Company
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DATA REQUEST

1_23 State whether any PJM costs were included in Kentucky Power's monthly FAC filings during the period under review. If yes, provide the amount of the costs by month and by type of cost.

RESPONSE

Yes, there were fuel-related PJM costs included in Kentucky Power's monthly FAC filings for the period under review. A breakdown for these costs is provided in the Company's monthly Fuel Adjustment Clause backup filing and is identified as the Billing Line Items. See KPCO_R_KPSC_1_23_Attachment1 for the cost by month and type as identified in the FAC backup filing.

Witness: Scott E. Bishop

Allowable BLI	Description	November 2021 Amount	December 2021 Amount	January 2022 Amount	February 2022 Amount	March 2022 Amount	April 2022 Amount
1200	Day-ahead Spot Market Energy	-	-	-	-	-	-
1200a		-	-	-	-	-	-
1205	Balancing Spot Market Energy	-	-	-	-	-	-
1205a		-	-	-	-	-	-
1210	Day-ahead Transmission Congestion	1,705,121.09	311,370.29	2,691,593.09	545,335.93	760,446.24	190,862.17
1210a							
1215	Balancing Transmission Congestion	148,906.80	25,306.92	(2,386,936.06)	(65,679.61)	46,629.26	127,045.10
1215a							
1218	Planning Period Congestion Uplift						
1218a							
1220	Day-ahead Transmission Losses	1,124,741.05	781,668.16	1,848,435.44	259,166.75	403,289.44	1,250,174.77
1220a							
1225	Balancing Transmission Losses	(46,623.34)	(3,533.42)	(452,395.56)	(22,546.03)	(13,086.67)	(73,096.75)
1225a							
1230	Inadvertent Interchange	(2,083.90)	(2,195.99)	(1,866.39)	735.53	(1,885.61)	(6,311.29)
1230a							
1250	Meter Error Correction	16,327.65	(17,593.59)	(20,837.59)	(37,012.10)	(5,178.74)	49,322.12
1250a		(20,163.20)	3,710.20	(49,316.42)	(34,111.59)	(187,458.22)	(80,435.53)
1260	Emergency Energy						
1260a							
1340	Regulation and Frequency Response Service Charge	122,102.00	75,264.01	4,708.28	53,876.53	80,035.36	46,959.03
1340a		30.62	181.40	38.86			11.91
1350	Energy Imbalance Service Charge						
1350a							
1360	Synchronized Reserve Charge	81,919.77	37,730.70	15,097.40	31,265.43	42,931.35	42,531.95
1360a							
1370	Day-ahead Operating Reserve Charge	2,803.51	11,819.79	3,767.07	5,432.29	1,033.08	806.40
1370a							
1375	Balancing Operating Reserve	64,931.17	46,529.71	35,311.73	46,124.32	24,451.28	32,415.30
1375a		1,254.45	157.46	(86.46)	109.49	204.37	(109.40)
1377	Synchronous Condensing Charge						
1377a							
1378	Reactive Services Charge	960.68	-				
1378a							
1400	Load Reconciliation for Spot Market Energy		(49.68)	0.01			
1400a							
1410	Load Reconciliation for Transmission Congestion	(0.88)	(1.50)	(1.75)	3.51	1.12	
1410a							
1420	Load Reconciliation Transmission Losses	(0.81)	(0.34)	(0.92)	(0.43)	0.80	

Allowable BLI	Description	November 2021 Amount	December 2021 Amount	January 2022 Amount	February 2022 Amount	March 2022 Amount	April 2022 Amount
1420a							
1430	Load Reconciliation for Inadvertent Interchange						
1430a							
1460	Load Reconciliation for Regulation and Frequency Response Service			(0.31)			
1460a							
1470	Load Reconciliation for Synchronized Reserve						
1470a							
1478	Load Reconciliation for Balancing Operating						
1478a							
1480	Load Reconciliation for Synchronous Condensing						
1480a							
1490	Load Reconciliation for Reactive Services						
1490a							
1500	Financial Transmission Rights Auction	597,587.52	560,238.27	597,586.86	522,889.08	578,912.85	541,563.75
1500a							
1930	Generation Deactivation Charge						
1930a							
2210	Transmission Congestion Credit						
2210a							
2211	Day-ahead Transmission Congestion	(2,109,725.25)	(642,629.33)	(2,494,674.24)	(990,511.10)	(653,249.89)	(504,141.16)
2211a					(40,070.18)	40,173.08	
2215	Balancing Transmission	240,462.20	81,879.95	815,300.73	461,408.06	307,802.16	318,475.51
2215a		(1,625.55)	(1,010.67)		141.43	(121.02)	
2217	Planning Period Excess Congestion Credit						
2217a							
2218	Planning Period Congestion Uplift Credit						
2218a							
2220	Transmission Losses Credit	(268,958.73)	(194,353.02)	(523,833.94)	(302,514.34)	(202,195.77)	(199,792.65)
2220a			(328.83)			(156.87)	
2260	Emergency Energy Credit						
2260a							
2340	Regulation and Frequency Response Service Credit	(5,578.25)	(42,388.39)	(3,865.67)	(15,999.63)	(12,985.63)	(12,462.62)
2340a		(24.41)	(28.91)	(12.31)			(72.21)
2350	Energy Imbalance Service Credit						
2350a							
2360	Synchronized Reserve Credit	(715.59)	(1,482.22)	(1,523.95)	(4,543.72)	(1,361.79)	(3,399.66)
2360a							
2370	Day-ahead Operating Reserve Credit		(5,416.98)	-	(4,122.73)	(6,714.14)	
2370a							
2375	Balancing Operating Reserve Credit	(4.57)	(11.23)	(4,870.66)	(2,712.11)	(9.46)	(326.40)

Allowable BLI	Description	November 2021 Amount	December 2021 Amount	January 2022 Amount	February 2022 Amount	March 2022 Amount	April 2022 Amount
2375a				(0.05)			
2377	Synchronous Condensing Credit						
2377a							
2378	Reactive Services Credit						
2378a							
2415	Balancing Transmission Congestion Load Reconciliation						
2415a							
2420	Load Reconciliation for Transmission Losses			0.62			
2420a							
2500	Financial Transmission Rights Auction						
2500a							
2510	Auction Revenue Rights	(597,586.56)	(560,237.40)	(597,586.56)	(522,888.24)	(578,911.98)	(541,562.82)
2510a							
2930	Generation Deactivation Credit						
2930a							
Sum of Allowable BLIs (In accounts outside those already being captured)		1,054,057.47	464,595.36	(525,968.75)	(116,223.46)	622,594.60	1,178,457.52

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DATA REQUEST

1_25 Explain how purchase power costs are accounted for in the calculation of the FAC when Kentucky Power is not experiencing a generation outage but must purchase power in order to meet demand (i.e., whether the entire amount of the purchase power recorded in the calculation, or there is a limit as to the amount recorded). If there is a limit, explain the basis for the limitation and how it is calculated. If there is no limit, explain the basis for including 100 percent of the purchase power costs.

RESPONSE

When Kentucky Power is not experiencing a generation outage but must purchase power in order to meet demand, the Company limits recovery of those purchase power costs through the FAC in accordance with 807 KAR 5:056, Section 1(3)(c), and the Commission's Order dated January 22, 2015 in Case No. 2014-00225.² More specifically, in those instances when Kentucky Power is not experiencing a generation outage but must purchase power in order to meet demand, the Company recovers through the FAC the lower of "the actual energy cost of the non-economy purchased energy or the fuel cost of its highest cost generating unit available to be dispatched to serve native load during the reporting expense month (typically the value of the peaking unit equivalent valuation)."³

^[2] Order, *In The Matter Of: An Examination Of The Application Of The Fuel Adjustment Clause Of Kentucky Power Company From November 1, 2013 Through April 30, 2014*, Case No. 2014-00225 (Ky. P.S.C. January 22, 2015).

^[3] *Id.*

Witness: Scott E. Bishop

Kentucky Power Company
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DATA REQUEST

- 1_26** Provide the amount, by month, of costs excluded from recovery from the FAC related to non-economy purchases.
- a. State whether Kentucky Power otherwise recovers the excluded costs.
 - b. If Kentucky Power does recover the excluded costs, explain in detail how those costs are recovered.

RESPONSE

Please see KPCO_R_KPSC_1_26_Attachment1 for the requested information, which shows, by month, the amount of purchased power costs calculated in the PUE calculation and excluded from the FAC via the line in the monthly calculation labeled 'Purchase Adjustment for Peaking Unit Equivalent'.

- a. and b. Purchased Power costs calculated in the PUE calculation and excluded from the FAC via the line in the monthly calculation labeled 'Purchase Adjustment for Peaking Unit Equivalent' are not included in the revenue requirement of any rider and are subject to base rate recovery.

Witness: Scott E. Bishop

Purchase Adjustment for Peaking Unit
Equivalent

November 2021	December 2021	January 2022	February 2022	March 2022	April 2022	Total
443,748	79,578	665,115	51,226	-	45,216	1,284,883

Kentucky Power Company
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DATA REQUEST

1_27 Provide the peaking unit equivalent (PUE) calculations in Excel spreadsheets with all formulas, columns, and rows unprotected and fully accessible.

RESPONSE

Please see the attachments provided in the Company's response to Staff question 1-16. The PUE calculations are included in the second tab of the attachments provided in that response.

Witness: Jason M. Stegall

Kentucky Power Company
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DATA REQUEST

1_28 For each month in the PUE calculations, explain whether Kentucky Power recovers any uneconomic purchased power costs resulting from the PUE calculations. If so, explain how these costs are recovered.

RESPONSE

Purchased Power costs calculated in the PUE calculation and excluded from the FAC via the line in the monthly calculation labeled 'Purchase Adjustment for Peaking Unit Equivalent' are not included in the revenue requirement of any rider and are subject to base rate recovery.

Witness: Jason M. Stegall

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DATA REQUEST

- 1_29** Explain how Kentucky Power's generating units are bid into PJM's energy market and the implications for the manner in which the units are run when the unit's bid in price is greater than the hourly LMP. For example, if the unit is bid in as "must run" and its bid in price is greater than the hourly LMP, explain whether the unit is ramped down to its economic minimum output level or whether it is run at some level greater than that for some other reason such as balancing or voltage support.

RESPONSE

Kentucky Power's generating unit are bid into PJM's energy market through the submission of a large amount of data that includes operating parameters, a market offer curve, a cost-based offer curve and commitment status. The commitment status values are limited to economic, must-run, emergency or not available. Economic units are dispatched via PJM's economic dispatch model. Must-run units are committed into the Day Ahead market to run at their economic minimum, although the PJM dispatch model can dispatch the unit to a level above economic minimum if the unit's cost, provided in the offer curve, is below the market clearing price. Emergency indicates that a unit is available only for emergency dispatch. Not available units are in an outage and incapable of delivering energy into the market. Please see the direct testimony of Company Witness Stegall for further discussion of the Company's activities in the PJM energy markets.

Witness: Jason M. Stegall

Kentucky Power Company
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DATA REQUEST

1_30 If the coal units are available, explain whether they are always bid into the energy market as “must run.” If not, then explain the circumstances under which the units are not bid in as such.

RESPONSE

No, coal units are not always submitted with a unit commitment status of Must Run when they are available. The Company has the obligation to offer all of its generating units into PJM every day. As part of its daily submittal to PJM, units have a designated commitment status, which are identified and explained in the Company's response to Staff 1-29. The Company's decision to commit a coal unit with a status of Must-Run versus a status of Economic includes, but is not limited to, factors such as generating unit economics, startup costs, existing fuel inventories, scheduled deliveries of fuel, operational constraints, scheduled environmental and capability testing, and safe operation of our generating units.

Witness: Jason M. Stegall

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DATA REQUEST

- 1_31** In an Excel spreadsheet format with all formulas, columns, and rows unprotected and fully accessible, for the period under review and when the units are available to run,
- a. Provide the bid status (i.e. economic dispatch, must-run, etc.), by day, of Kentucky Power's coal generating units into PJM's day ahead market. Explain the reason for each bid status.
 - b. Provide the price per MWH, by day, of Kentucky Power's generating units bid into PJM's day ahead market and the corresponding LMP indicating whether or not the unit cleared the market.
 - c. In a separate spreadsheet Tab, provide a graphical representation of the information in part b. above.

RESPONSE

- a. Please see KPCO_R_KPSC_1_31_PUBLIC_Attachment1 for the hourly commitment status of the Big Sandy and Mitchell generating units. The Company does not document the reason for the selection of each status but does document the reasons for selecting a Must-Run commitment status for its coal-fired generating units. That information is provided in KPCO_R_KPSC_1_31_PUBLIC_Attachment2.
- b. Please see KPCO_R_KPSC_1_31_PUBLIC_Attachment3 for the Company's Day Ahead market offer curves submitted to PJM. Please see KPCO_R_KPSC_1_31_PUBLIC_Attachment4 for the energy cleared and the price earned in the Day Ahead market.
- c. The Company cannot provide the requested graphical representation because the Company's prices are submitted as an offer curve consisting of various segments that, in total, cover the range of each unit's output from economic minimum to economic maximum. This information cannot be graphed.

Witness: Jason M. Stegall

The Attachment is Redacted in its Entirety.

The Attachment is Redacted in its Entirety.

The Attachment is Redacted in its Entirety.

The Attachment is Redacted in its Entirety.

Kentucky Power Company
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Dated September 13, 2022

DATA REQUEST

1_32 For the period under review, explain whether when the units are not on a planned, maintenance, or forced outage, PJM considers the units as being in available status. If not, explain the circumstances under which the units would not be considered in available status.

RESPONSE

PJM considers a unit as available when it is in service and available for dispatch. When units are unavailable due to an outage, the Company submits their unit commitment status as Unavailable.

Witness: Jason M. Stegall

Kentucky Power Company
KPSC Case No. 2022-00263
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Dated September 13, 2022
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DATA REQUEST

1_33 Refer to Kentucky Power's supplemental files to the expense months for the period under review, at unnumbered page 3, the Note labeled (A), regarding the demurrage charges. For each expense month for the period under review, provide explanation for the cause of the demurrage charges and which party was at fault.

RESPONSE

The Kentucky Power share of the demurrage charges for the review period total \$11,950. There is a combination of reasons for the demurrage charges across the six months in the reporting period.

Some of the demurrage charges are a result of weather events. There are three types of weather events that typically result in demurrage charges. First, during cold weather events the Company only unloads barges as needed for the running units to run the coal through the crusher from the coal unloader straight to the coal feeders to the units. This practice prevents frozen coal problems that frequently would result in forced curtailments and potentially a forced outage. This cold weather procedure benefits customers by keeping the Mitchell Plant available.

The second type of weather event that could result in demurrage charges is when there is a significant ice event in the winter where the coal unloader will not operate due to ice and when it is not safe to put the barge handlers on icy barges.

The third type of weather event that could result in demurrage charges is when there is flooding or other high river events that make it impossible to physically get the barges under the coal unloader until the river level drops.

In addition, some demurrage charges are due to staffing constraints and the timing of when barges are dropped off in the harbor. Over the past year the plant has had several folks retire and leave for other reasons leaving the department short-staffed. The plant has been working diligently to replace folks, but it has been very difficult in today's labor market, and given that new employees must go through a significant training program to become sufficiently skilled. Because of these staffing constraints, the plant cannot unload barges at the frequency it has in the past.

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In addition, the plant also receives gypsum barges and limestone barges that have to be unloaded by the same personnel. At times the plant must balance these unloading efforts.

An explanation for the demurrage charges incurred each month of the review period is explained below.

November 2021– A tow of nine barges were dropped off the day after Thanksgiving. Due to the holiday and number of personnel scheduled, no unloading occurred until the Monday after Thanksgiving, which resulted in the demurrage charges for November. Six of those nine barges were unloaded on November 29, 2021 and November 20, 2021. The demurrage charges for the remaining three barges are reflected in the December 2021 demurrage charges.

December 2021– Part of the demurrage charge for December 2021 result from the three barges described above. Six more barges were received in the middle of December and were unloaded as needed in order to keep fresh coal coming through the crusher from the unloader straight to the coal feeders for the units to help prevent frozen coal problems during a very cold stretch of time. This necessary procedure resulted in demurrage charges.

January 2022 – On two separate occasions in January 2022, coal barges were dropped off in the harbor ahead of schedule and on a weekend. These barges could not be unloaded until the first part of the following week due to staffing constraints and in order to balance unloading efforts with gypsum barges, which resulted in demurrage charges.

February 2022 – On one occasion in February 2022, coal barges were dropped off in the harbor ahead of schedule and on a weekend. These barges could not be unloaded until the first part of the following week due to staffing constraints and in order to balance unloading efforts with gypsum barges, which resulted in demurrage charges. The plant also had to suspend unloading barges at one point in the month due to freezing rain and ice preventing unloading operations for a few days.

March 2022 - On two separate occasions in March 2022, coal barges were dropped off in the harbor ahead of schedule and on a weekend. These barges could not be unloaded until the first part of the following week due to staffing constraints and in order to balance unloading efforts with gypsum barges, which resulted in demurrage charges.

April 2022– In April 2022 the plant received and unloaded an unusually high number of coal barges in addition to gypsum barges. The barges came in faster than they could be

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unloaded with present staffing constraints, even while working overtime, resulting in demurrage charges.

Witness: Kimberly K. Chilcote

Witness: Douglas J. Rosenberger

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Dated September 13, 2022

DATA REQUEST

1_34 Refer to Kentucky Power's supplemental file to the December 2021 expense month, filed on February 14, 2022, at unnumbered page 3, the Notes labeled (A). The line states, "There was a 3rd Quarter 2021 barging true up of (\$527,274.32) (\$263,637.16 KYPCo share) [...]". Provide an explanation for the 3rd Quarter 2021 barging true up.

RESPONSE

River Transportation Division (RTD) performs the barging for the AEP Affiliates. RTD charges Kentucky Power a rate for estimate coal transportation. The rate charged by RTD is determined by taking the forecasted total RTD expenses (plus a FERC approved rate of return) and dividing it by the forecasted tons of coal that will be shipped. A true-up is performed each quarter to account of the difference in actual expenses and actual tons shipped versus the forecast.

Witness: Scott E. Bishop

Kentucky Power Company
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DATA REQUEST

1_35 Refer to any of Kentucky Power's monthly form A filings, page 4 of 5, the Over or (Under) Recovery Schedule, Line 2 labeled "Retail KWH Billed at Above Rate". For each expense month for the period under review, provide documented justification for the kWh billed.

RESPONSE

The kWh appearing on Line 2 of Kentucky Power's monthly form A filings, page 4 of 5, the Over or (Under) Recovery Schedule is obtained from meter readings, which represents actual kWh metered, and accruals. The kWh are billed at the FAC rate on Line 1 of Kentucky Power's monthly form A filings, page 4 of 5, the Over or (Under) Recovery Schedule. "Above Rate" means the rate shown on Line 1, which exactly matches the FAC rate for the applicable billing month being trued-up.

Witness: Scott E. Bishop



Chilcote Verification Case No 2022 00263 - DR responses.doc

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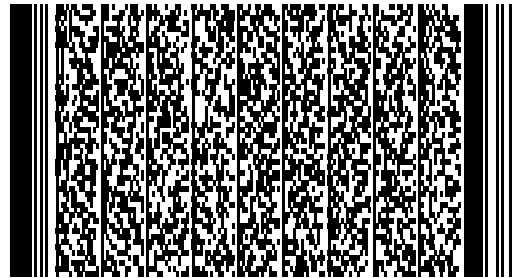
E-Signature Summary

E-Signature 1: Kimberly Chilcote (KKC)

September 28, 2022 11:33:57 -8:00 [9645859FEE27] [167.239.221.104]
kkchilcote@aep.com (Principal) (Personally Known)

E-Signature Notary: Jennifer Young (JAY)

September 28, 2022 11:33:57 -8:00 [DBC9FF1BABAD] [167.239.221.107]
jayoung1@aep.com
I, Jennifer Young, did witness the participants named above electronically sign this document.





Stutler Verification Case No 2022 00263 - DR responses.doc

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E-Signature Summary

E-Signature 1: Clinton Stutler (CMS)

September 28, 2022 11:17:22 -8:00 [493D2818582E] [167.239.221.104]
cmstutler@aep.com (Principal) (Personally Known)

E-Signature Notary: Jennifer Young (JAY)

September 28, 2022 11:17:22 -8:00 [BAA20D41E333] [167.239.221.107]
jayoung1@aep.com
I, Jennifer Young, 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.

Clinton Stutler
Signed on 2022/09/28 11:17:22 -8:00

Clinton M. Stutler

Commonwealth of Kentucky)
)
County of Boyd)

Case No. 2022-00263

Subscribed and sworn before me, a Notary Public, by Clinton M. Stutler this 28th day of September, 2022.

JAY
Signed on 2022/09/28 11:17:22 -8:00

Notary Public

JENNIFER A. YOUNG
ONLINE NOTARY PUBLIC
STATE AT LARGE KENTUCKY
Commission # KYNP31964
My Commission Expires Jun 21, 2025
Notary Stamp 2022/09/28 11:17:22 PST BAA2004E333

Notarial act performed by audio-visual communication

My Commission Expires 06/21/2025

Notary ID Number: KYNP31964

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Massie Verification Case No 2022 00263 - DR responses.doc

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E-Signature Summary

E-Signature 1: Paul J. Massie (PJM)

September 28, 2022 07:53:22 -8:00 [FEFC8CCA9272] [167.239.221.102]
pjmassie@aep.com (Principal) (Personally Known)

E-Signature Notary: Jennifer Young (JAY)

September 28, 2022 07:53:22 -8:00 [4EE25AA8E272] [167.239.221.107]
jayoung1@aep.com
I, Jennifer Young, did witness the participants named above electronically sign this document.



VERIFICATION

The undersigned, Paul J. Massie, being duly sworn, deposes and says he is the Plant Manager – 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.

Paul J. Massie

Commonwealth of Kentucky)
)
County of Boyd)

Case No. 2022-00263

Subscribed and sworn before me, a Notary Public, by Paul J. Massie this 28th day of September, 2022.

Notary Public

JENNIFER A. YOUNG
 ONLINE NOTARY PUBLIC
 STATE AT LARGE KENTUCKY
Commission # KYNP31964
 My Commission Expires Jun 21, 2025

Notary Stamp 2022/09/28 07:53:22 PST AEE25A8E272

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My Commission Expires 06/21/2025

Notary ID Number: KYNP31964

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Rosenberger Verification Case No 2022 00263 - DR responses.doc

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E-Signature Summary

E-Signature 1: Douglas J Rosenberger (DJR)

September 28, 2022 11:03:12 -8:00 [3AFE90AD5850] [167.239.221.104]
 djrosenberger@aep.com (Principal) (Personally Known)

E-Signature Notary: Jennifer Young (JAY)

September 28, 2022 11:03:12 -8:00 [FF79F7E2F421] [167.239.221.107]
 jayoung1@aep.com
 I, Jennifer Young, did witness the participants named above electronically sign this document.



VERIFICATION

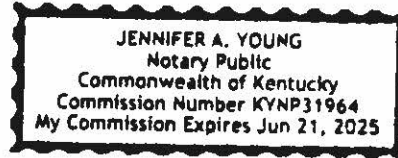
The undersigned, Scott E. Bishop, being duly sworn, deposes and says he is a Regulatory Consultant Sr. for Kentucky Power Company, that he has personal knowledge of the matters set forth in the foregoing responses, and the information contained therein is true and correct to the best of his information, knowledge, and belief after reasonable inquiry.


_____
Scott E. Bishop

Commonwealth of Kentucky)
)
County of Boyd)

Case No. 2022-00263

Subscribed and sworn before me, a Notary Public, by Scott E. Bishop this 28th day of September, 2022.



_____
Notary Public

My Commission Expires 6/21/2025

Notary ID Number: KYNP31964



Stegall Verification Case No 2022 00263 - DR Responses.doc

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E-Signature Summary

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

September 29, 2022 09:11:40 -8:00 [F125C2A7D251] [167.239.221.107]
jmstegall@aep.com (Principal) (Personally Known)

E-Signature Notary: Jennifer Young (JAY)

September 29, 2022 09:11:40 -8:00 [9CE5AABCA375] [167.239.221.106]
jyoung1@aep.com
I, Jennifer Young, 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.


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Signed on 2022/09/29 09:11:40 -8:00

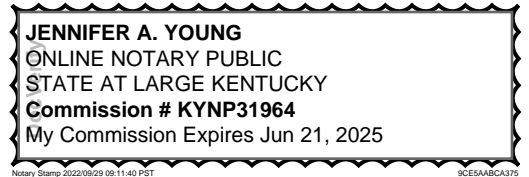
Jason M. Stegall

Commonwealth)
County of Boyd)

Case No. 2022-00263

Subscribed and sworn before me, a Notary Public, by Jason M. Stegall this 29th day of September, 2022.


Signed on 2022/09/29 09:11:40 -8:00



Notary Public

Notarial act performed by audio-visual communication

My Commission Expires 06/21/2025

Notary ID Number: KYNP31964

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