

Kentucky Power Company  
KPSC Case No. 2023-00008  
Commission Staff's Second Set of Post-Hearing Data Requests  
Dated April 8, 2024  
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**DATA REQUEST**

**KPSC  
PHDR 2\_1** Refer to Kentucky Power's response to Commission Staff's First Post-Hearing Request for Information, Item 2b. Identify all personnel involved in the review and analysis of PJM's Manual 13 for the purpose of implementing Kentucky Power's coal conservation strategy.

**RESPONSE**

The Company objects to this request on the ground that the term "implementing Kentucky Power's coal conservation strategy" is overly broad, vague, and undefined. The Company construes the term to refer to the decision whether to include an adder to the offering price for the Mitchell Plant, in order to avoid consuming the limited amount of coal available in the market during a time that would have minimized the value of running the plant for the benefit of Kentucky Power's customers throughout the review period.

Without waiving this objection, the Company states as follows:

The Company's coal conservation strategy was not the result of the changes to PJM Manual 13 in October 2021. Instead, the Company's coal conservation strategy was implemented to maximize the economic value of the Mitchell Plant in light of a historically constrained coal market. Kentucky Power provided extensive and unrefuted testimony in this case that a combination of macroeconomic events outside of the Company's control resulted in a shortage of coal available for generation. In particular, a sharp increase in electric demand as the country exited the COVID-19 pandemic, an increase in international demand for coal and natural gas, and an inability of coal producers to meaningfully increase production resulted in a lack of available coal in the market to meet demand.

The testimony also shows that the Company took extraordinary efforts to obtain coal during this period. The Company issued an RFP in March 2021 to ensure that it had available for use the amount of coal necessary to meet its forecasted demand. When it became evident that actual demand for coal-fired generation would exceed the forecasted demand, the Company, in September 2021, issued an RFP seeking coal to meet this increased demand. The Company received no offers for coal in response to the September 2021 RFP. The Company sought coal through other means, including contacting the West Virginia Coal Association to determine if there were other sources of coal available in the market who may not have responded to the September 2021 RFP.

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There simply was not enough coal available in the market from the fall of 2021 through the fall of 2022 to meet the demand for coal-fired generation.

Faced with this lack of coal in the market, the Company implemented its coal conservation strategy. Through the coal conservation strategy, the Company used price adders in its market-based offers to maximize the economic value of the Mitchell Plant for its customers. By doing so, the Company prevented the Mitchell Plant from running out of coal and ensured that the units were available to operate when market prices were the highest, providing the greatest benefit to customers. Additionally, the coal conservation strategy avoided forced outages (and subsequent derates) for the units during the review period. The October 2021 change to PJM Manual 13 required its member generators to maintain at least a ten-day supply of coal. If generators failed to maintain a 10-day supply, the units were required to be placed in Maximum Emergency status (limiting their operation to periods of emergency) until the coal supply at the generator exceeded 21 days. The changes to PJM Manual 13 did not force Kentucky Power to implement its coal conservation strategy; the lack of available coal in the market did that. The limits established by the changes to PJM Manual 13 did not vary the Company's conservation strategy.

The Company's records do not reflect the names of the individuals that specifically reviewed the referenced PJM Manual 13 changes in late 2021. However, personnel in the following groups were generally aware of the changes: Commercial Operations, Generation, Plant Operations, Forecasting, and Regulatory.

Witness: Alex E. Vaughan

Witness: Kimberly K. Chilcote

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**DATA REQUEST**

**KPSC  
PHDR 2\_2** Provide the minutes of the meetings where Kentucky Power's coal conservation strategy devised and any subsequent implementation meetings were held.

**RESPONSE**

The Company objects to this request to the extent it is unintelligible and construes the request to refer to meetings among Company personnel (including AEPSC personnel providing services to the Company) during which measures to ensure that Kentucky Power's coal inventory at the Mitchell Plant during the review period for this case were appropriate were discussed. The Company further objects on the ground that the term "Kentucky Power's coal conservation strategy" is overly broad, vague, and undefined. The Company construes the term to refer to the decision whether to include an adder to the offering price for the Mitchell Plant, in order to avoid consuming the limited amount of coal available in the market during a time that would have minimized the value of running the plant for the benefit of Kentucky Power's customers throughout the review period.

Without waiving these objections, the Company states as follows:

Please refer to the Company's response to PHDR 1-1, no meeting minutes were created.

Witness: Alex E. Vaughan

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**DATA REQUEST**

**KPSC PHDR 2\_3** Starting from the date Kentucky Power acquired its share of the Mitchell station through the end of the current review period, for each calendar year, provide the number of hours Mitchell Unit 1 was in a forced outage, maintenance outage, planned outage, reserve shutdown, and actual operation transmitting energy.

**RESPONSE**

The Company objects to this request on the grounds that it is overbroad, unduly burdensome, and is not reasonably calculated to lead to the discovery of admissible evidence in connection with the two-year period under review as it seeks information concerning the operation of the Mitchell Plant Unit 1 for a prior period outside of the review period in the present case and for which the application of the Company's fuel adjustment clause has already been adjudicated by the Commission. The Company further objects to the extent the term "actual operation transmitting energy" is undefined, vague, susceptible to be misinterpreted or given multiple meanings, and therefore ambiguous and unintelligible. The Company construes the term to mean those periods when the unit was "Generating" as identified in the PJM GADS, meaning that it was operating and connected to the PJM transmission system regardless of level of output.

Without waiving these objections, the Company states as follows:

<b>Period</b>	<b>Total Hours in Period</b>	<b>Forced Outage Hours</b>	<b>Maintenance Outage Hours</b>	<b>Planned Outage Hours</b>	<b>Reserve Shutdown Hours</b>	<b>Generating Hours</b>
<b>Nov-Dec 2020</b>	1,464.00	-	229.50	596.63	370.70	267.17
<b>2021</b>	8,760.00	2,575.31	951.24	1,382.52	477.39	3,373.54
<b>Jan-Oct 2022</b>	7,296.00	350.51	464.57	576.00	853.39	5,051.53

Witness: Timothy C. Kerns

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**DATA REQUEST**

**KPSC PHDR 2\_4** Starting from the date Kentucky Power acquired its share of the Mitchell station through the end of the current review period, for each calendar year, provide the number of hours Mitchell Unit 2 was in a forced outage, maintenance outage, planned outage, reserve shutdown, and actual operation transmitting energy.

**RESPONSE**

The Company objects to this request on the grounds that it is overbroad, unduly burdensome, and is not reasonably calculated to lead to the discovery of admissible evidence in connection with the two-year period under review as it seeks information concerning the operation of the Mitchell Plant Unit 2 for a prior period outside of the review period in the present case and for which the application of the Company's fuel adjustment clause has already been adjudicated by the Commission. The Company further objects to the extent the term "actual operation transmitting energy" is undefined, vague, susceptible to be misinterpreted or given multiple meanings, and therefore ambiguous and unintelligible. The Company construes the term to mean those periods when the unit was "Generating" as identified in the PJM GADS meaning that it was operating and connected to the PJM transmission system regardless of level of output.

Without waiving these objections, the Company states as follows:

<b>Period</b>	<b>Total Hours in Period</b>	<b>Forced Outage Hours</b>	<b>Maintenance Outage Hours</b>	<b>Planned Outage Hours</b>	<b>Reserve Shutdown Hours</b>	<b>Generating Hours</b>
<b>Nov-Dec 2020</b>	1,464.00	-	-	-	236.50	1,227.50
<b>2021</b>	8,760.00	390.82	991.73	1,220.60	597.68	5,559.17
<b>Jan-Oct 2022</b>	7,296.00	20.85	1,461.79	154.00	1,653.07	4,006.29

Witness: Timothy C. Kerns

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**DATA REQUEST**

**KPSC  
PHDR 2\_5** Starting from the time Kentucky Power acquired its share of the Mitchell station the end of the current review period, for each calendar year, the total dollar cost of purchased power and the average total cost of purchased power as a direct result of forced outages and separately of maintenance outages.

**RESPONSE**

The Company objects to this request on the grounds that it is overbroad and unduly burdensome, and is not reasonably calculated to lead to the discovery of admissible evidence in connection with the two-year period as it seeks information concerning the operation of the Mitchell Plant for a prior period outside of the review period in the present case and for which the application of the Company's fuel adjustment clause has already been adjudicated by the Commission. The Company further objects to the extent the terms "purchased power as a direct result of forced ages and separately of maintenance outages" are undefined, vague, susceptible to be misinterpreted or given multiple meanings, and therefore ambiguous and unintelligible. The Company construes the terms "purchase power" to refer to power purchases during the review period in this case.

Without waiving these objections, the Company states as follows:

Kentucky Power does not purchase power as a direct result of generator operation status because it does not dispatch its generation resources to match its specific native load requirements. As a member of a power pool, now the PJM RTO, the Company has a contractual right to access energy to meet its energy demands.

From an energy cost perspective, the Company's customers receive the lower of the cost of production or market resulting from an economic dispatch process. When economic (i.e., when variable cost of generation is less than the marginal cost of energy from PJM), the Company's generation provides a financial hedge on the cost of spot market energy. When the cost of spot market energy is less than the variable cost of the Company's generation sources, the Company's resources are not dispatched (i.e., do not generate energy) and customers simply pay the lower cost of market energy.

Kentucky Power does not track separately purchases made during periods when its generating units are not operating (regardless of reason). Therefore, the requested information is not available.

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Please also refer to the Company's response to KIUC 1-3 in Case Numbers 2021-00292, 2022-00036, 2022-00263, and 2023-00008 for the Commission-approved forced outage replacement cost calculations.

Witness: Alex E. Vaughan

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**DATA REQUEST**

**KPSC  
PHDR 2\_6** Starting from the date Kentucky Power acquired its share of the Rockport station through the end of the current review period, for each calendar year, provide the number of hours Rockport was in a forced outage, maintenance outage, planned outage, reserve shutdown, and actual operation transmitting energy.

**RESPONSE**

The Company objects to this request on the grounds that it is overbroad, unduly burdensome, and is not reasonably calculated to lead to the discovery of admissible evidence in connection with the two-year period under review as it seeks information concerning the operation of the Rockport Plant for a prior period outside of the review period in the present case and for which the application of the Company's fuel adjustment clause has already been adjudicated by the Commission. The Company further objects to the extent the term "actual operation transmitting energy" is undefined, vague, susceptible to be misinterpreted or given multiple meanings, and therefore ambiguous and unintelligible. The Company construes the term to mean those periods when the unit was "Generating" as identified in the PJM GADS meaning that it was operating and connected to the PJM transmission system regardless of level of output.

Without waiving these objections, the Company states as follows:

As a threshold matter, the Company states that it did not own or operate the Rockport Plant at any time during the review period. The Company has never had a property interest in the Rockport Plant and has never operated the Rockport Plant. During the review period, the Company was a party to a FERC-regulated unit power agreement under which it was entitled to 15 percent of the capacity and energy associated with Rockport Unit 1 and Rockport Unit 2 ("Rockport UPA"). The Rockport UPA terminated on December 8, 2022, and therefore was in force during the entirety of the review period in this case.



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Rockport Unit 1:

<b>Period</b>	<b>Total Hours in Period</b>	<b>Forced Outage Hours</b>	<b>Maintenance Outage Hours</b>	<b>Planned Outage Hours</b>	<b>Reserve Shutdown Hours</b>	<b>Generating Hours</b>
<b>Nov-Dec 2020</b>	1,464.00	-	854.70	97.63	198.50	313.17
<b>2021</b>	8,760.00	633.59	1,323.09	2,295.00	755.05	3,753.27
<b>Jan-Oct 2022</b>	7,296.00	402.92	1,887.74	1,171.47	1,555.34	2,278.53

Rockport Unit 2:

<b>Period</b>	<b>Total Hours in Period</b>	<b>Forced Outage Hours</b>	<b>Maintenance Outage Hours</b>	<b>Planned Outage Hours</b>	<b>Reserve Shutdown Hours</b>	<b>Generating Hours</b>
<b>Nov-Dec 2020</b>	1,464.00	-	638.87	-	343.30	481.83
<b>2021</b>	8,760.00	9.43	2,832.09	1,263.83	1,378.32	3,276.33
<b>Jan-Oct 2022</b>	7,296.00	446.70	765.08	1,272.00	984.75	3,827.47

Witness: Timothy C. Kerns

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**DATA REQUEST**

- KPSC  
PHDR 2\_7** For the period during which the coal conservation strategy was in effect beginning in October 2021 and either Mitchell Unit 1 or Mitchell Unit 2 was in reserve shutdown status;
- a. Explain whether PJM approved the unit status on a daily / day ahead basis.
  - b. Explain whether the decision to place a unit in Reserve Shutdown was wholly or in part based upon the coal conservation adder being included with the unit's day ahead offer price and, consequently, Kentucky Power determined that a particular unit would not clear the day ahead market.
  - c. Provide the monthly cost of purchased power that is a direct result of either Mitchell Unit 1 or Mitchell Unit 2 being placed in reserve shutdown.

**RESPONSE**

The Company objects to this request on the ground that the term “coal conservation strategy” is overly broad, vague, and undefined. The Company construes the term to refer to the decision whether to include an adder to the offering price for the Mitchell Plant, in order to avoid consuming the limited amount of coal available in the market during a time that would have minimized the value of running the plant for the benefit of Kentucky Power's customers throughout the review period. The Company further objects to the extent the request is based on assumptions that are not supported by evidence in the case, and is speculative.

Without waiving these objections, the Company states as follows:

- a. The daily unit commitment status of a generating resource is not subject to PJM approval or disapproval. PJM does not approve daily unit commitment statuses.
- b. There is no “decision” to place a unit in reserve shutdown. A unit is said to be in reserve shutdown status when it was committed on an economic basis and is not required to run by PJM as part of the pool-scheduled security constrained economic dispatch solution.

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c. Please refer to the Company's response to PHDR 2-5 and part a. The Company does not track purchased power expense specifically for the time periods when PJM does not economically select the Mitchell plant as part of the pool-scheduled security constrained economic dispatch solution.

Witness: Alex E. Vaughan (a. and c.)

Witness: Timothy C. Kerns (b.)

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**DATA REQUEST**

**KPSC  
PHDR 2\_8** When written solicitations for coal are made for Kentucky Power, explain whether the same solicitations are sent simultaneously for the other AEP affiliates to the same potential suppliers.

**RESPONSE**

AEPSC does not issue solicitations for coal for specific operating companies or for specific generating facilities. Instead, it issues solicitations for coal from specific geologic regions (NAPP, CAPP, PRB, etc.) and for specific periods. AEPSC issues solicitations in this manner because it allows it to take advantage of buying power associated with the AEP system. Suppliers submit offers based on the coal they have available, and all offers are contingent on confirmation by the Supplier that the coal remains available for the proposed transaction and the parties agreeing on commercial terms for a supply agreement.

AEPSC coordinates with the operating companies and generating facilities to ensure that coal contracted through these solicitations are allocated to the facilities in the most cost-effective manner. AEPSC performs an economic analysis of each offer to the plants to determine the total delivered cost to the plant and then the lowest cost is selected for purchase. For example, NAPP coal contracted from the ACRN facility adjacent to Mitchell is delivered to Mitchell because the belt line from the mine makes delivery to Mitchell the most cost-effective use of that coal. If the lowest cost is the same for multiple plants the offer is allocated ratably to generating facilities based on the specific supply needs of the facilities.

Witness: Kimberly K. Chilcote

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**DATA REQUEST**

**KPSC** Explain whether the coal suppliers bidding and supplying coal to the  
**PHDR 2\_9** Mitchell station also provide coal to AEP's other generation stations and,  
if so, explain whether the coal is sourced from the same mines.

**RESPONSE**

Please see the Company's response to PHDR 2-8.

Witness: Kimberly K. Chilcote

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**DATA REQUEST**

**KPSC  
PHDR 2\_10**      Aside from the instance when Kentucky Power's coal inventory was in danger of falling below PJM's ten-day full burn inventory level, explain whether Kentucky Power ever makes oral solicitations for coal in addition to the periodic written solicitations and, if so, explain whether the oral solicitations are made to the same suppliers receiving written solicitations.

**RESPONSE**

The Company objects to this request to the extent the term "oral solicitation" is undefined, vague, susceptible to be misinterpreted or given multiple meanings, and therefore ambiguous and unintelligible. The Company construes the term "oral solicitation" to refer to verbal requests for coal purchases during the review period in this case. The Company further objects to this request on the ground that request is based on assumptions that are not supported by evidence in the case in so far as it asserts that Kentucky Power's coal inventory was "in danger" of falling below PJM's ten-day full burn inventory level.

Without waiving these objections, the Company states as follows:

Through the use of electronic communications, the process for issuing written solicitations for coal purchases is simple and allows for a written record of both the terms sought and the offers provided in response. Accordingly, AEPSC does not as a matter of course issue oral solicitations for coal purchases and did not issue any oral solicitations during the review period.

However, as discussed in the Company's response to PHDR 2-1 above, the unprecedented constraints on the coal market in the second half of 2021 and in 2022 forced AEPSC to engage in informal discussions with suppliers, outside of a formal solicitation process, about the potential availability of coal in the market. As a result of these discussions, the Company received four unsolicited offers from coal suppliers between January and September 2022 and purchased coal from each of these informal offers.

Witness: Kimberly K. Chilcote

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**DATA REQUEST**

**KPSC  
PHDR 2\_11** Explain whether potential coal suppliers ever make or are encouraged to make unsolicited offers to sell coal to Kentucky Power or to any other AEP East affiliate. If so, explain whether Kentucky Power has accepted any of these offers during the review period.

**RESPONSE**

The Company objects to this request to the extent it is not reasonably calculated to lead to the discovery of admissible evidence to the extent it pertains to time periods outside the two-year period under review in this case.

Without waiving this objection the Company states as follows:

AEPSC, on behalf of the Company, frequently communicates with its suppliers to discuss coal availability and the Company's needs. At times these conversations may lead to suppliers offering coal via an unsolicited offer. AEPSC reviews unsolicited offers on behalf of the Company in the same manner it reviews a formal solicitation and may choose to purchase the coal offered based on the review. Between January and September 2022, four unsolicited offers from coal companies led to coal purchases.

Witness: Kimberly K. Chilcote

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**DATA REQUEST**

**KPSC PHDR 2\_12** Refer to Kentucky Power's response to the Attorney General and the Kentucky Industrial Utility Customers' Second Request for Information, Item 4, Confidential Attachments 3 and 4, and to Kentucky Power's response to Commission Staff's First Request for Information (Staff's First Request), Item 31, Confidential Attachments 3 and 4 in Case No. 2022-00263. Based upon the offer curves and prices, explain why it appears to be more expensive to run units at full output than at reduced capacity.

**RESPONSE**

Thermal generating units generally require more equipment to be online or run at elevated levels to keep the generating units operating safely and efficiently when operating at higher output levels. Additionally, the amount of fuel required to operate a fossil-fueled steam turbine increases in proportion to the unit's energy output. This is due to a number of factors but is primarily driven by the need for more steam from the boiler to spin the turbine that generates megawatts of energy. Thus, the amount of fuel needed to produce energy is not uniform across a plant's operating range. Incrementally more fuel is needed at higher relative to lower operating levels, which also contributes to making the unit more expensive to run per MWh at full output than at reduced capacity. The additional amount of fuel required for the additional steam required to increase the unit's output by one megawatt is described by the following simplified formula for incremental heat:

$$\text{MMBtus of Heat to increase one megawatt of output} = [ \text{B-Coefficient} + (2 * \text{C-Coefficient} * \text{MW}) ] * \text{HeatRateAdjustmentFactor}$$

For the Big Sandy unit on April 21, 2024, the incremental heat rate required to achieve unit minimum of 60MWs =  $[7.4243 + (2 * .00241 * 60)] * 1.079 = 8.32\text{MMBtus/MWh}$ . The amount of incremental heat required to achieve unit maximum of 300MWs =  $[7.4243 + (2 * .00241 * 300)] * 1.079 = 9.57\text{MMBtu/MWh}$ .

The difference in incremental heat required to achieve 300MWs versus 60MWs is  $9.57 - 8.32$ , or  $1.25\text{MMBtu/MWh}$ . Using a total fuel-related cost of the unit is  $\$2.06/\text{MMBtu}$ , the cost difference per MWh to incrementally achieve 300MWs versus 60MWs is  $1.25\text{MMBtu/MWh} * \$2.06/\text{MMBtu} = \$2.57/\text{MWh}$ .



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In compliance with PJM's operating rules for submitting incremental offers, on April 21, 2024, Kentucky Power offered the Big Sandy unit to PJM at 60MWs for \$19.40/MWh and at 300MWs for \$21.97/MWh, a difference of \$2.57/MWh.

In summary, both the amount of fuel required and the unit cost to operate are proportional to the megawatt output of the unit. The increasing difference in cost is explained by the increasing heat rate of fuel to achieve higher output and can be calculated using the simplified formula presented. While the example shown pertains to Big Sandy Unit 1, the explanation is the same for the Mitchell units, albeit with different numerical inputs for each unit's formula.

Witness: Alex E. Vaughan

Witness: Timothy C. Kerns

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**DATA REQUEST**

- KPSC  
PHDR 2\_13** Refer to Kentucky Power's response to Staff's First Request, Item 2C, Attachment 1; Kentucky Power's response to the Attorney General and the Kentucky Industrial Utility Customers' Second Request for Information, Item 4, Confidential Attachments 3 and 4; and to Kentucky Power's response to Staff's First Request, Item 31, Confidential Attachments 2 and 3 in Case No. 2022-00263. For the period during which the coal conservation strategy was in effect beginning in October 2021. Comparing the unit offer curves, adders, offer prices and the locational marginal prices, it seems clear that the Mitchell units, absent the coal conservation strategy adder price inclusion, would have run more.
- a. Provide the hourly purchased power cost and number of hours resulted from the coal conservation strategy adders being included in Mitchell Units' day ahead offer prices.
  - b. Provide the hourly cost and number of hours the Mitchell units would have been called to run resulting in lower purchased power cost absent the inclusion of the price adder.

**RESPONSE**

The Company objects to this request on the ground that the term "implementing Kentucky Power's coal conservation strategy" is overly broad, vague, and undefined. The Company construes the term to refer to the decision whether to include an adder to the offering price for the Mitchell Plant, in order to avoid consuming the limited amount of coal available in the market during a time that would have minimized the value of running the plant for the benefit of Kentucky Power's customers throughout the review period. The Company further objects to the extent the request is based on assumptions that are not supported by evidence in the case and is speculative.

Without waiving these objections, the Company states as follows:

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The underlying premise of this request, that had the Company not engaged in its coal conservation strategy, the Company would have operated the Mitchell generating station more than it did during the review period is fundamentally flawed. This premise assumes that Kentucky Power had ready access to a coal supply sufficient to meet the market demand for coal-fired generation. The undisputed record in this case demonstrates that the opposite is true. The unprecedented market conditions described in more detail in the Company's response to PHDR 2-1 resulted in a coal market insufficient to meet the demand for coal fired generation. Kentucky Power implemented the coal conservation strategy to maximize the economic value for its customers of a coal supply constrained by circumstances outside of its control.

- a. The Company has not and cannot accurately perform the requested analysis. PJM would have to re-run its security constrained economic dispatch model for the system with Mitchell being offered without coal conservation adders included in market-based offers. The results of that dispatch solution would have to be compared with what actually occurred during the review period. The complexity of what would change in the market results as a result of adding or subtracting actual Mitchell plant generation would make it impossible to backcast the results without re-running the entire model.
- b. The coal conservation adders did not impact the accounting cost of fuel recorded or recovered by the Company associated with the Mitchell plant during the review period. They were included in the market based offers the Company provided to PJM for purposes of its security constrained economic dispatch model solution. As stated in the Company's unrefuted testimony, the lack of availability in the coal market would have caused the Mitchell plant to run out of coal during the review period and the plant would have been placed in a forced outage had the Company not undertaken the energy market offer strategy that it did. The total amount of generation from Mitchell did not change as a result of the coal conservation adders. Instead, the adders helped to maximize the economic benefit from the generation that could be produced given the finite amount of coal available to the Company and the Mitchell plant. Said more simply, the coal conservation adders changed when the generation occurred, not the volume of generation.

Witness: Alex E. Vaughan



## Chilcote Discovery Verification Form.doc

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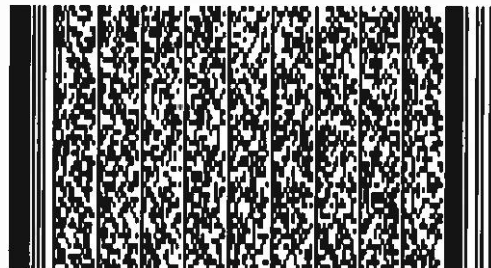
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### E-Signature Summary

**E-Signature 1: Kimberly Chilcote (KKC)**  
 April 29, 2024 07:21:11 -8:00 [1AD250CDD016] [107.77.194.191]  
 kkchilcote@aep.com (Principal) (Personally Known)

**E-Signature Notary: Marilyn Michelle Caldwell (MMC)**  
 April 29, 2024 07:21:11 -8:00 [CCBD76DBDFA2] [167.239.221.106]  
 mmcaldwell@aep.com  
 I, Marilyn Michelle Caldwell, dd witness the participants named above electronically sign this document.








**VERIFICATION**

The undersigned, Alex E. Vaughan, being duly sworn, deposes and says he is the Managing Director for Renewables and Fuel Strategy 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.

  
\_\_\_\_\_  
Alex E. Vaughan

State of Ohio )  
County of Franklin )

Case No. 2023-00008

Subscribed and sworn to before me, a Notary Public in and before said County and State, by Alex E. Vaughan, on April 30, 2024.

  
\_\_\_\_\_  
Notary Public

My Commission Expires 4/18/2028

Notary ID Number 2018-RE-717644