

Kentucky Power Company
KPSC Case No. 2023-00008
Commission Staff's Second Set of Data Requests
Dated October 19, 2023

DATA REQUEST

KPSC 2_1 Refer to the Direct Testimony of Alex E. Vaughan (Vaughan Direct Testimony), page 6, lines 10–11. Explain whether the Kentucky Power load zone is the same as the American Electric Power Company, Inc. (AEP) zone within PJM. If not, explain the differences between the two zones.

RESPONSE

The Company is part of the AEP zone within PJM. For energy settlement purposes the Company has its own LMP settlement aggregate. The “AEP Kentucky Residual Aggregate” is that pricing point which represents the Company’s load within the larger zone.

Witness: Alex E. Vaughan

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- KPSC 2_2** Refer to the Vaughan Direct Testimony, page 12, lines 20–22 and page 13, lines 1–2.
- a. Explain whether the offer curve can be adjusted on an hour-by-hour basis such that an adder can be included for some hours, but not others.
 - b. Explain how the amount of an hourly adder is determined to influence when PJM may call upon either Mitchell unit to run.
 - c. In Excel spreadsheet format with all formulas, rows, and columns unprotected and fully accessible, provide which hours over the two-year period an adder was included in each Mitchell unit offer curve

RESPONSE

- a. Yes it can be adjusted hourly.
- b. Each month, in order to provide customers with the most economic benefit from the Company's generation portfolio, members of AEPSC Commercial Operations, AEPSC Fuel Procurement, various generation personnel, and AEPSC Regulatory Services meet to review the current inventory levels at each coal-fired generating unit, the expected deliveries of coal, expected electricity demand, and market forward prices in order to forecast future coal inventory levels. This meeting also includes a discussion of scheduled outages, scheduled equipment testing, and potential market events such as a transmission outage that may require PJM to commit the unit. The final result is the determination of a pricing increment needed to manage each unit's coal inventory based on the information available. The resulting pricing increment is implemented to reduce unit dispatch, primarily in off-peak hours, for the unit in question, thus preserving coal supply to maximize customer benefit in hours with high market prices. For additional information please see Vaughan Direct Testimony on pages 12 to 14.
- c. Please refer to KPCO_R_KPSC_2_2_Attachment1 for the requested information. The adder information is "effective dated" meaning that after the initial date and adder, that adder remained in effect until a subsequent change is made.

Witness: Alex E. Vaughan

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- KPSC 2_3** Refer to the Vaughan Direct Testimony, page 14, lines 7–13.
- a. Explain which, if any, other AEP East affiliated units were included in the coal conservation increment strategy. Include in the response the owner of the unit.
 - b. Provide a list of the days over the two-year review period when the coal conservation increment strategy was implemented.
 - c. Provide a list of the days over the review period when the offer strategy directly avoided a forced outage that would have been precipitated by the coal inventory reaching or in danger of reaching its PJM 10-day level.

RESPONSE

- a. All coal units were included due to the coal supply constraints being an industry and market wide issue. These units include: Appalachian Power Company's Amos Units 1, 2, and 3 and Mountaineer Plant; and Indiana Michigan Power Company and AEP Generating Company's Rockport Units 1 and 2.
- b. The coal conservation adder strategy was in effect every day beginning October 13, 2021 through November 30, 2022 for Mitchell Units 1 and 2. Please also see the Company's response to Staff 2-2, part c.
- c. Please refer to KPCO_R_KPSC_2_3_Attachment1 for the requested information.

Witness: Alex E. Vaughan

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KPSC 2_4 Refer to the Vaughan Direct Testimony, page 16, lines 1-4.

- a. Explain whether the forward power purchases are purely financial in nature or whether Kentucky Power is actually taking delivery of energy during a proscribed time.
- b. If Kentucky Power is actually taking delivery of energy, explain whether this was through a separate bilateral or other contract type.
- c. Refer also to Kentucky Power's response to Staff's First Request for Information (Staff's First Request), Item 31. Assuming that the PJM AD HUB is not sufficiently liquid and Kentucky Power purchases financial future contracts from adjacent zones or other liquid hubs, such as the PJM West HUB, explain what additional costs, if any, would be incurred for these transactions.
- d. Explain whether any other regulated AEP affiliates are currently employing forward power purchases.

RESPONSE

- a. The forward power purchases referenced in Company Witness Vaughan's Testimony are financial in nature, and there is no delivery of physical power with them.
- b. Please see the Company's response to part a.
- c. The transactional costs would be the same for transactions at the other settlement points, however the cost of financial power may be different due to that point's expected LMP and any basis (congestion and loss values) between it and the AD Hub.
- d. Yes, other regulated AEP affiliates of Kentucky Power Company are engaging in forward purchases of power.

Witness: Alex E. Vaughan

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KPSC 2_5 Refer to the Vaughan Direct Testimony, page 17, lines 13–14 and page 18, lines 1–3. Explain the critical issue fast path as Kentucky Power understands it and the potential policy and operational impacts.

RESPONSE

PJM made its CIFP filing with the FERC on October 13, 2023. This proposal is in response to the PJM board's February 24, 2023 letter calling for near-term changes to its capacity construct to promote continued reliability in the RTO which is publicly available at <https://www.pjm.com/-/media/about-pjm/who-we-are/public-disclosures/20230224-board-letter-re-initiation-of-the-critical-issue-fast-path-process-to-address-resource-adequacy-issues.ashx>.

The Company continues to review the proposal, but preliminary findings that will affect the Company and its customers are as follows:

1. PJM is increasing the capacity reserve margin requirement for load serving entities. The current estimate is an approximate 3% increase from roughly 15% to roughly 18%.
2. Resource accreditation for thermal resources is changing from the previous equivalent forced outage rate (EFORd) method of valuing unforced capacity (UCAP) to a marginal effective load carrying capability (ELCC) methodology.
3. PJM is also proposing changes to the capacity performance (CP) construct that will impact fixed resource requirement (FRR) entities like the Company. These changes include:
 - a. The loss of the physical MW cure option if an FRR entity is deficient MW during a CP event;
 - b. The loss of physical MW netting of performance within a FRR plan for CP event compliance; and
 - c. The addition of a stop loss for CP non-compliance charges at 1.5 times the base residual auction clearing price.

These proposed changes would make all FRR resources individually subject to capacity performance non-compliance charges and over-compliance bonus credits. This could impact the Company's customers by transferring credit risk from other entities in PJM that declare bankruptcy or file settlement agreements for less than the billed amount CP

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non-compliance charges as has been the case in 2023 as a result of the Winter Storm Elliot event.

Witness: Alex E. Vaughan

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DATA REQUEST

KPSC 2_6 Refer to the Direct Testimony of Kimberly K. Chilcote (Chilcote Direct Testimony), page 7, Table 1 and lines 1–7.

a. For the two-year review period, provide, in Excel spreadsheet format with all formulas, rows, and columns unprotected and fully accessible, an update to Table 1 illustrating each coal contract that had to be amended, whether the coal was high sulfur or low sulfur, the reason for the contract amendment, the periods during which no coal was delivered per the contract and the periods during which the coal-pile inventory was at or in danger of reaching the PJM 10-day level such that the coal conservation increment strategy was implemented.

b. Refer also to Kentucky Power's response to for Staff's First Request, Item 14, Attachment 1. Provide, in Excel spreadsheet format with all formulas, rows, and columns unprotected and fully accessible, an update to Attachment 1 to show over the two-year review period the amounts of coal delivered during Mitchell unit outages or reserve shutdowns. Include in the response whether the coal-pile inventory was at or in danger of reaching the PJM 10-day inventory level.

RESPONSE

a. Please see KPCO_R_KPSC_2_6_Attachment1 for the requested information. The Direct Testimony of Company Witness Chilcote discusses in further detail actions taken by the Company to address the shortfalls on page 7 line 8 through page 9 line 3. Please refer to KPCO_R_KPSC_2_6_Attachment2 for the ending month inventory for the Review Period. The Company implemented the coal conservation increment strategy in order to provide customers with the most economic benefit from the finite/constrained amount of coal available to the Company's Mitchell plant as discussed by Company Witness Vaughan page 12 line 6 through page 14 line 8. Please see KPCO_R_KPSC_2_6_Attachment3 for the months where the Company used the coal conservation increment strategy.

b. The Company does not track inventory by unit but rather by coal type, and therefore is unable to provide the information in the exact manner requested. Nonetheless, please see KPCO_R_KPSC_2_6_Attachment2 for the monthly ending inventory and full-load burn days for the Review Period. For months where the coal conservation strategy was used

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during the review period, please refer to KPCO_R_KPSC_2_6_Attachment3 and part a for an explanation.

Witness: Kimberly K. Chilcote

Witness: Alex E. Vaughan

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DATA REQUEST

KPSC 2_7 Refer to the Chilcote Direct Testimony, page 9, lines 7–12. If Kentucky Power had received all the coal (both short term and long term) in a timely fashion during

RESPONSE

This statement appears to the Company to relate to Staff's Second Request, Item 8. Please refer to the Company's response to KPSC 2-8.

Witness: Kimberly K. Chilcote

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DATA REQUEST

KPSC 2_8 Refer to the Chilcote Direct Testimony, page 9, lines 7–12. If Kentucky Power had received all the coal (both short term and long term) in a timely fashion during the two-year review period for which Kentucky Power had contracted, explain whether there would have been a need to seek additional supplies.

RESPONSE

Yes, there still would have been a need to seek additional coal supply due to the unprecedented demand for coal-fired electricity during the review period. However, the Company reiterates that it did receive all coal contracted for after some necessary contract modifications. Those contracts that required modification were relatively low-cost contracts when compared high market prices. Therefore, the Company prudently engaged in contract modifications with those suppliers in order to take delivery of that cheaper coal rather than go to the market to replace those contracts at a higher cost. The Direct Testimony of Company Witness Chilcote discusses in further detail the actions taken by the Company to address shortfalls on page 7 line 8 through page 9 line 3. Although the Company was required to modify some contracts, the Company also prudently sought additional supplies due to the aforementioned increase in demand in order to ensure reliable service to customers.

Witness: Kimberly K. Chilcote

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DATA REQUEST

KPSC 2_9 Refer to the Direct Testimony of Scott E. Bishop (Bishop Direct Testimony), page 6, Table SEB-1. Provide in excel format with cells visible and unprotected an update to the table adding in each generation unit's monthly capacity factor.

RESPONSE

Please see KPCO_R_KPSC_2_9_Attachment1 for the requested information.

Witness: Scott E. Bishop

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DATA REQUEST

KPSC 2_10 Refer to the Bishop Direct Testimony, page 7, lines 6–10.

- a. Explain whether Kentucky Power has received customer complaints regarding the volatility of the fuel component in driving volatility of their overall bill.

- b. Explain the extent to which customers, especially residential customers, take advantage of Kentucky Power's budget billing program as a method of alleviating volatility.

RESPONSE

- a. The Company received a total of 43 written customer complaints regarding the fuel component of customer bills between November 2020 and October 2022. The Company does not track specifically whether the complaint relates to volatility of the fuel component. Please see KPCO_R_KPSC_2_10_Attachment1 for the number of written complaints received per month regarding the fuel component.

- b. The Average Monthly Payment ("AMP") plan and Equal Payment ("Budget") plan are optional payment programs that can levelize customers' bills throughout the year to help avoid seasonal spikes. Since each is an optional program, the number of participating customers on AMP and Budget fluctuates throughout the year due to customers enrolling or removing their account from the programs. Nearly 1,800 customers enrolled in AMP from the end of November 2021 through March 2022, which corresponds to months with a higher fuel component. Some customers may have enrolled in a budget program due to the volatility of the fuel component, however the reason for enrollment is not tracked. Please see attachment KPCO_R_KPSC_2_10_Attachment2 to review the total number of customers participating in AMP or budget as of the end of each month from November 2020 through October 2022.

Witness: Scott E. Bishop

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DATA REQUEST

KPSC 2_11 Refer to the Bishop Direct Testimony, page 8, Table SEB-2, and page 9, lines 19–22. Refer also to Case No. 2022-00263,2 Kentucky Power's response to Staff's First Request, Item 15.

a. February 2022 has a monthly fuel rate of 4.110 cents per kWh. Explain why this month is not a better representation of the two-year average of 4.111 cents per kWh.

b. September 2021 has a monthly fuel rate of 3.446 cents per kWh. Since this rate is closest to the average forecasted fuel rate, explain why this monthly historical rate is not the most reasonable for use as the new base fuel rate.

c. Explain how the final evaluated future coal prices for both low sulfur (coal was purchased) and high sulfur coal (no coal purchases) found in Kentucky Power's response to Staff's First Request, Item 4, Confidential Attachment 1, compare to the coal price forecasts supporting forecast fuel cost in Table SEB-2.

RESPONSE

- a. When choosing a representative month for the base fuel rate, the Company employs a step-by-step process whereby it identifies all reasonable representative months within the two-year review period and then chooses the best and most reasonable representative month for the base fuel period.

First the Company finds the: two-year historical average rate, two-year historical median rate, and the average forecasted fuel cost. Next, the Company eliminates any months from the two-year review period that had a forced outage with corresponding replacement power costs. The Company eliminates months with such forced outages because these months generally have unexpected additional costs that would not result in a representative base fuel rate. Lastly, the Company chooses from the remaining months the most reasonable and representative month based on the two-year average base fuel rate, the two-year median base fuel rate, and the average forecasted or projected fuel cost.

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As explained in the Bishop Direct Testimony, the monthly fuel rates during the review period included a higher-than-typical amount of “outlier” months where fuel costs were higher than, or much higher than, normal. Therefore, the Company determined that it was not reasonable to rely only on the two-year average as a benchmark for its proposed base fuel rate because the two-year average is unreasonably skewed due to these outlier months. Instead, the Company determined it to be more reasonable to rely on the two-year median monthly fuel rate to inform the proposed base fuel rate because the median is less affected by outlier months than the average. The two-year median also is very close to average forecasted fuel costs. Therefore, for these reasons, the February 2022 fuel rate of 4.110 cents per kWh would not be a reasonable fuel rate upon which to base the proposed base fuel rate going forward because it most closely approximates only the two-year average rather than the two-year median and forecasted fuel costs.

- b. Please see the Company’s response to subpart (a). The Company eliminated September 2021 as a potential base fuel period because there was a forced outage during that month for which the Company also had corresponding replacement power costs. Please also see the Company’s response to KPSC 2-12.

- c. The coal prices provided in Staff’s First Request, Item 4, Confidential Attachment1 are higher than the fuel prices from Table SEB-2. The average cost in cents per kWh from the Staff’s First Request, Item 4, Confidential Attachment 1 is \$7.01 for low sulfur coal and \$6.15 for high sulfur coal. The average projected fuel cost in cents per kWh from Table SEB-2 is \$3.49.

Table SEB-2 provides a lower average projected fuel costs because it utilizes a combined price for coal, gas, and market purchases and sales. Comparatively, coal prices are based on purchases at a certain time and reflecting market conditions at the time of purchase. Accordingly, as market conditions change, the price for coal directionally changes.

Witness: Scott E. Bishop

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DATA REQUEST

KPSC 2_12 Refer to the Bishop Direct Testimony, page 9, lines 19–23. Refer also to Case No. 2022-00263, Kentucky Power's response to Staff's First Request, Item 15. Big Sandy 1 had a forced outage on January 19, 2022. Explain the significance of the number of forced outages as opposed to the number of maintenance outages and reserve shutdowns in determining the reasonableness of using January 2022 as the closest month to the historical two-year average.

RESPONSE

It is the Company's typical practice to choose a month for the base fuel period that had no forced outages with corresponding replacement power costs in order to get an accurate representation of fuel costs. The Company inadvertently concluded that there were no forced outages at any of the Company's generating units during January 2022. Upon further review, the Company has confirmed that there was, in fact, a forced outage during January 2022. However, the Company incurred no replacement power costs as a result of that forced outage as there was adequate net available generation resources to meet internal load requirements. Therefore, January 2022 remains a reasonable base fuel period. The Company will file an errata to the Direct Testimony of Company Witness Bishop to reflect the information in this response.

Witness: Scott E. Bishop

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KPSC 2_13 Refer to the direct testimony of Douglas H. Rosenberger, page 6, lines 1–10. Explain when the stay plates had last been inspected and how often stay plates and associated parts should be inspected.

RESPONSE

Stay plates should be inspected every 8-10 years, at the same time that air heater baskets are replaced, because stay plates can only be completely seen (and therefore inspected) when the air heater baskets have been removed for replacement. The stay plates were last inspected in 2012, and the inspection confirmed that they did not need to be replaced at that time.

Witness: Douglas J. Rosenberger

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DATA REQUEST

KPSC 2_14 Refer to Kentucky Power's response to Staff's First Request, Item 2, Attachment 1.

- a. Explain the meaning of "non-ratable shipment volumes" and why the companies agreed for non-ratable shipment volumes.
- b. Explain how coal shipments from Ohio counties reach the Mitchell station.

RESPONSE

a. A ratable shipment or volume is a monthly volume that is not equal to the contractual volume divided by the applicable number of months. For example, if a contract calls for a volume of 120,000 tons over a 12-month term, a ratable amount would be 10,000 tons per month for each month of the 12-month term. In this example, a non-ratable shipment or volume by contrast would be a monthly volume other than the ratable 10,000 tons per month.

Contracts typically do not require monthly ratable volumes, and the parties can agree to volumes other than monthly ratable volumes if the contract otherwise provides for such shipments. Coal plants may need to receive coal on a non-ratable basis due to factors such as planned and unplanned plant outages, the space available for coal storage at the plant, unloading equipment outages, and forecasted plant operations. Coal mine factors such as longwall moves, vacations and holidays, and river or rail issues also can affect the monthly volume of a mine's coal shipments and result in non-ratable shipments.

b. Under the ACNR contract referenced in Attachment 1 to KPSC 1-2, the Company receives coal primarily from the McElroy Mine in West Virginia by conveyor. The Company potentially could have received coal from the Century Mine in Ohio via barge, but it did not.

Witness: Kimberly K. Chilcote

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DATA REQUEST

KPSC 2_15 Refer to Kentucky Power's response to Staff's First Request, Items 3c and 3d.

a. The target inventory levels do not agree. Explain whether the target levels in 3c or 3d are correct.

b. Since the high sulfur burn at Mitchell is roughly 46 percent higher than the low sulfur burn, explain why the target inventory levels have both been set at the same level.

RESPONSE

a. During the review period, the target levels listed in the Company's response to KPSC 1-3(c) (15 days for low sulfur and 30 days for high sulfur) were the Company's target levels. As indicated in the Company's response to KPSC 1-3(d), the Company changed its target levels as of January 1, 2023 to 35 days for both coal types.

b. High sulfur burn was not 46% higher than low sulfur burn. Rather, the Mitchell Plant during the Review Period burned a blend of 55% high sulfur coal and 45% low sulfur coal. The new target inventories were established by the Company as part of its annual review of its procurement practices. Kentucky Power changed its target inventory days as of January 1, 2023, due to the unprecedented volatility seen in 2021 and 2022 as discussed in Company Witness Kimberly Chilcote's Direct Testimony.

Witness: Kimberly K. Chilcote

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DATA REQUEST

KPSC 2_16 Refer to Kentucky Power's response to Staff's First Request, Item 4, Attachments 1 and 2. For low sulfur coal purchases, Attachment 1 lists the maximum sulfur content at 1.67 pounds. Attachment 2 lists a purchases in 2022 and 2023 with 2.50 pounds sulfur each. Explain the rationale for exceeding purchase guidelines.

RESPONSE

The Company had a need for coal at the time the September 2022 RFP was issued and purchased small quantities from this supplier to fill some of the need due to the tight market conditions.

Witness: Kimberly K. Chilcote

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DATA REQUEST

KPSC 2_17 Refer to Kentucky Power's response to Staff's First Request, Item 14, Attachment 1. Previously, in addition to listing reasons for unit outages, Kentucky Power has listed "reserve shutdown" as an instance when a unit is offline.

- a. Explain whether a unit in reserve shutdown is consuming fuel.
- b. Explain the rationale for deciding whether or not to place a unit into reserve shutdown and how long to maintain that designation. Include in the explanation whether PJM approves that designation in the same manner as with planned or maintenance outages.

RESPONSE

- a. No fuel is consumed by a unit in reserve shutdown.
- b. If a unit isn't selected to run for economic reasons by PJM, but is available for dispatch, the unit is in reserve shutdown status. The unit will remain in reserve shutdown until PJM selects it to run for economic reasons, or if there is an emergent need for the unit to run (the unit is self-committed or "must run"). Reserve shutdown is distinct from the process of scheduling planned or maintenance outages, which are initiated by the Company and approved by PJM.

Witness: Douglas J. Rosenberger

Witness: David L. Mell

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DATA REQUEST

KPSC 2_18 Refer to Kentucky Power's response to Staff's First Request, Item 15, Attachment 1. For May and August of 2022, Mitchell 1 and 2 both have similarly high availability factors. Explain the large differences in the respective capacity factors. Include in the response a cross-reference to any information already in the record.

RESPONSE

Mitchell Unit 2 was not selected economically and therefore was in reserve shutdown for a substantial period of time in May of 2022 while Mitchell Unit 1 was selected economically based on the Company's market offers. This difference in dispatch between the two units is due to the Company's coal conservation adder strategy as discussed by Company Witness Vaughan in his Direct Testimony. The adder applied to Unit 2's market offer was higher than Unit 1, leading to the disparity in generation between the two units despite the similarity in availability factors in May of 2022.

The same dynamic was true for August of 2022, but in addition to that, Unit 1 had an elevated minimum output level to 500 MW due to an issue with the unit's feed pump turbine alternate steam supply valve. That first offer segment of Unit 1 did not include an adder so the unit ran at that level while available throughout the month.

Witness: Douglas J. Rosenberger

Witness: David L. Mell

Witness: Alex E. Vaughan

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KPSC 2_19 Refer to Kentucky Power's response to Staff's First Request, Item 17, Attachment 1.

- a. Explain the rationale for switching the commitment status of the Big Sandy 1 Unit from Must Run to Economic.
- b. On May 10, 2022, Mitchell 1 went from Economic to Must Run commitment status. Explain the apparent unit de-rate and rationale for the hourly operational maximum and minimum ranges.
- c. On May 12, 2022, when Mitchell 1 went from Must Run to Economic commitment status, the generation range did not change. Explain the rationale for the change in commitment status.

RESPONSE

- a. Big Sandy Unit 1 was committed as must run over a weekend (Saturday – Monday gas days) to ensure that the unit would be available Tuesday the 3rd. The unit was in operation on the previous Friday but was marginally economic through the weekend, so the Company's Commercial Operations team made the decision to commit the unit as must run so that it would be available to meet anticipated economic demand on Tuesday, otherwise the unit would have been cycled and would not have been available on Tuesday.
- b. On that date the Mitchell Plant conducted 100% high sulfur coal test burns at different load ranges to gather data and see how the unit would perform on 100% high sulfur coal at the various load ranges. The Mitchell units cannot burn 100% high sulfur coal and attain full load if the sulfur content is above 4.5 lb/mmbtu. These tests were ran to determine at what level the Mitchell units could dispatch utilizing 100% high sulfur coal since it is typically cheaper coal.
- c. Please see the Company's response to part b. Mitchell Unit 1 was moved back to economic commitment status following the high sulfur coal testing.

Witness: Douglas J. Rosenberger

Witness: Alex E. Vaughan



Chilcote Discovery Verification Form.doc

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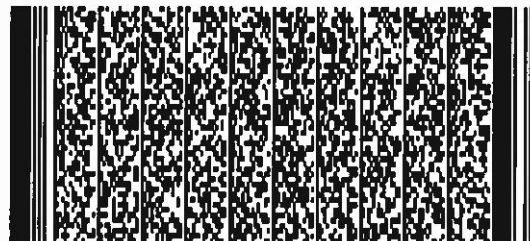
E-Signature Summary

E-Signature 1: Kimberly Chilcote (KKC)

October 31, 2023 10:09:46 -8:00 [A0B8EF44D1C6] [12.111.104.2]
kkchilcote@aep.com (Principal) (Personally Known)

E-Signature Notary: Marilyn Michelle Caldwell (MMC)

October 31, 2023 10:09:46 -8:00 [8AF3FF37B6C1] [167.239.221.105]
mmcaldwell@aep.com
I, Marilyn Michelle Caldwell, did witness the participants named above electronically sign this document.



VERIFICATION

The undersigned, Kimberly K. Chilcote, being duly sworn, deposes and says she is a Coal Procurement Manager for American Electric Power Service Corporation, that she 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 her information, knowledge, and belief.

Kimberly Chilcote
Signed on 2023-10-31 10:00 AM -0400

Kimberly K. Chilcote

Commonwealth of Kentucky)
)
County of Boyd)

Case No. 2023-00008

Subscribed and sworn to before me, a Notary Public in and before said County and State, by Kimberly K. Chilcote, on October 31, 2023.

Notary Public

Marilyn Michelle Caldwell

Notarial act performed by audio-visual communication

MARILYN MICHELLE CALDWELL
ONLINE NOTARY PUBLIC
STATE AT LARGE KENTUCKY
Commission # KYNP71841
My Commission Expires May 05, 2027

My Commission Expires May 5, 2027

Notary ID Number KYNP71841

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 Remote Notary: Yes/ State: KY

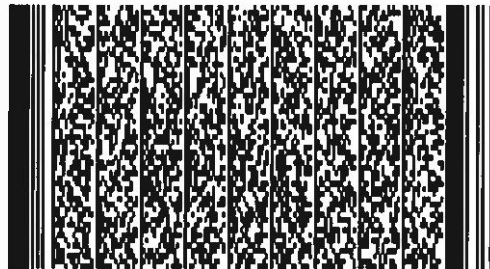
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E-Signature Summary

E-Signature 1: David L Mell (DLM)
 October 30, 2023 07:09:08 -8:00 [11C02268ED24] [167.239.221.104]
 dlmell@aep.com (Principal) (Personally Known)

E-Signature Notary: Marilyn Michelle Caldwell (MMC)
 October 30, 2023 07:09:08 -8:00 [E3A673A2A3B9] [167.239.221.101]
 mmcaldwell@aep.com
 I, Marilyn Michelle Caldwell, did witness the participants named above electronically sign this document.



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VERIFICATION

The undersigned, David L. Mell, being duly sworn, deposes and says he is the Energy Production Superintendent – Big Sandy Plant 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.

David L. Mell

David L. Mell

Commonwealth of Kentucky)
County of Boyd)

Case No. 2023-00008

Subscribed and sworn to before me, a Notary Public in and before said County and State, by David L. Mell, on October 30, 2023.

Notary Public

Marilyn Michelle Caldwell

MARILYN MICHELLE CALDWELL
ONLINE NOTARY PUBLIC
STATE AT LARGE KENTUCKY
Commission # KYNP71841
My Commission Expires May 05, 2027

My Commission Expires May 5, 2027 Notarial act performed by audio-visual communication

Notary ID Number KYNP71841

5DDEB0F1-DD57-4966-AA82-3676B7CC7762 ... 2023/10/30 06:12:46 -8:00 --- Remote Notary





Rosenberger Discovery Verification Form.doc

DocVerify ID: D64F7A44-FC11-4077-9BE4-B7DD8C91C85B
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E-Signature Summary

E-Signature 1: Douglas J Rosenberger (DJR)
 October 30, 2023 08:31:35 -8:00 [9AB3D56074B0] [167.239.221.106]
 djrosenberger@aep.com (Principal) (Personally Known)

E-Signature Notary: Marilyn Michelle Caldwell (MMC)
 October 30, 2023 08:31:35 -8:00 [0D9023EA2487] [167.239.221.101]
 mmcaldwell@aep.com
 I, Marilyn Michelle Caldwell, did witness the participants named above electronically sign this document.



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VERIFICATION

The undersigned, Douglas J. Rosenberger, being duly sworn, deposes and says he is the Mitchell Plant Manager 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.

Douglas J. Rosenberger
Douglas J. Rosenberger

_____))
_____)) Case No. 2023-00008
_____))

Subscribed and sworn to before me, a Notary Public in and before said County and State, by Douglas J. Rosenberger, on October 30, 2023.

Notary Public Marilyn Caldwell



Notarial act performed by audio-visual communication

My Commission Expires May 5, 2027

Notary ID Number KYNP71841

D64F7A44-FC11-4077-9BE4-B7DD8C91C85B -- 2023/10/27 06:01:06 -8:00 --- Remote Notary

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 11/2/23.


Notary Public



Paul D. Flory
Attorney At Law
Notary Public, State of Ohio
My commission has no expiration date
Sec. 147.03 R.C.

My Commission Expires 11-2-23

Notary D N umber No ID