

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

An Electronic Examination Of The)	
Application Of The Fuel Adjustment Clause)	
Of Kentucky Power Company From)	Case No. 2024-00136
November 1, 2022 through April 30, 2023)	

DIRECT TESTIMONY OF
JASON M. STEGALL
ON BEHALF OF KENTUCKY POWER COMPANY

**DIRECT TESTIMONY OF
JASON M. STEGALL ON BEHALF OF
KENTUCKY POWER COMPANY
BEFORE THE PUBLIC SERVICE COMMISSION OF KENTUCKY**

CASE NO. 2024-00136

TABLE OF CONTENTS

<u>SECTION</u>	<u>PAGE</u>
I. INTRODUCTION	1
II. BACKGROUND	1
III. PURPOSE AND SUMMARY OF TESTIMONY	2
IV. PLANNING AND RESOURCE PROCUREMENT FOR THE REVIEW PERIOD	2
V. COAL INVENTORY MANAGEMENT	5
VI. PERFORMANCE OF RESOURCE PLANNING AND PROCUREMENT DECISIONS DURING WINTER STORM ELLIOT	8
VII. CONCLUSION.....	16

**DIRECT TESTIMONY OF
JASON M. STEGALL ON BEHALF OF
KENTUCKY POWER COMPANY
BEFORE THE PUBLIC SERVICE COMMISSION OF KENTUCKY**

CASE NO. 2024-00136

I. INTRODUCTION

1 **Q. PLEASE STATE YOUR NAME, POSITION AND BUSINESS ADDRESS.**

2 A. My name is Jason M. Stegall. I am employed by American Electric Service
3 Corporation (“AEPSC”) as Director – Regulatory Services. My business address is 1
4 Riverside Plaza, Columbus, Ohio 43215. AEPSC is a wholly-owned subsidiary of
5 American Electric Power Company, Inc. (“AEP”), the parent Company of Kentucky
6 Power Company (the “Company” or “Kentucky Power”).

II. BACKGROUND

7 **Q. PLEASE SUMMARIZE YOUR EDUCATIONAL BACKGROUND AND**
8 **BUSINESS EXPERIENCES.**

9 A. I graduated from the Virginia Polytechnic Institute and State University with a
10 Bachelor of Science degree in Accounting in 1997 and I earned my Master’s in
11 Business Administration from the Ohio State University in 2011. I joined AEPSC in
12 June 1997 as an Accountant in the Regulated Accounting Division of the Accounting
13 Department. From 1997 to 2009, I held various positions in Accounting and Risk
14 Management. In July 2009, I joined the Regulatory Services Department as a
15 Regulatory Consultant in Customer and Distribution Services Support. In July 2010, I
16 transferred to Regulated Pricing & Analysis where my role focused on developing cost-

1 of-service studies and rate designs as well as other projects related to regulatory issues
2 and proceedings, individual customer requests, and general rate matters. In December
3 2017, I was promoted to Manager of Regulatory Pricing and Analysis where I managed
4 the team that supports the fuel-related and purchased-power related filings across
5 AEP's eleven retail jurisdictions. In September 2022, I was promoted into my current
6 position.

III. PURPOSE AND SUMMARY OF TESTIMONY

7 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY IN THIS PROCEEDING?**

8 A. The purpose of my testimony is to describe the Company's resource and fuel supply
9 procurement strategy during the period of November 1, 2022 through April 30, 2023
10 (the "Review Period"). Additionally, I discuss the results of the Company's resource
11 procurement decisions during Winter Storm Elliott specifically and how the
12 Company's actions during that event were good for customers.

IV. PLANNING AND RESOURCE PROCUREMENT FOR THE REVIEW PERIOD

13 **Q. DID KENTUCKY POWER'S CAPACITY PORTFOLIO CHANGE DURING**
14 **THE SIX MONTH FAC REVIEW PERIOD?**

15 A. Yes. The Rockport Unit Power Agreement ("UPA") expired in accordance with its
16 terms on December 8, 2022. Consistent with the plan outlined in the Company's 2019
17 Integrated Resource Plan ("2019 IRP") Kentucky Power purchased 152.4 MW of short-
18 term capacity to meet its PJM obligations between December 8, 2022 and May 31,
19 2023, the end of the 22/23 PJM capacity delivery year.

1 **Q. HAS THERE BEEN ANY MATERIAL CHANGE TO THE METHOD IN**
2 **WHICH THE COMPANY SOURCES THE CAPACITY AND ENERGY IT**
3 **USES TO PROVIDE SAFE AND RELIABLE ELECTRIC SERVICE TO ITS**
4 **CUSTOMERS SINCE ROCKPORT UPA EXPIRED ON DECEMBER 8, 2022?**

5 A. No there has not. The Company and its affiliates in the collective FRR plan meet 100%
6 of their RTO capacity obligation with unit specific resources—but those resources are
7 provided to PJM as a contribution to adequacy for all participants in the PCA. Those
8 resources do not directly serve the Company. This strategy makes a lot of practical and
9 economic sense for an electric utility the size of the Company. Larger power pool
10 membership allows the Company access to generation resource fuel diversity, and
11 electric supply reliability it could not economically provide on its own. This advantage
12 of scale and diversity proved its value during Winter Storm Elliott in December 2022
13 when smaller balancing authorities in the Commonwealth of Kentucky experienced
14 load shedding (black outs) because of insufficient power supply but the Company and
15 the other PJM RTO utilities in the Commonwealth did not.

16 **Q. DID THE STAKEHOLDERS IN THE 2019 IRP AGREE ON WHETHER THE**
17 **COMPANY SHOULD UTILIZE SHORT TERM CAPACITY PURCHASES?**

18 A. Yes. Both the Attorney General (“AG”) and Kentucky Industrial Utility Customers,
19 Inc. (“KIUC”) (collectively, “AG-KIUC”) advocated for the use of short-term bilateral
20 market capacity purchases and the PJM spot energy market in lieu of the Company
21 owning long-term assets to fill the same need. In their joint comments on Kentucky
22 Power’s 2019 IRP Preferred Plan, AG-KIUC stated: “This is further evidence that the
23 Company should adjust its Preferred Plan to include additional MPs [market

1 purchases], and it should not be overlooked that we have been in a low-cost
2 environment for more than ten years with no indication this will change any time
3 soon.”¹ The joint comments also state:

4 In its response to Staff’s Post Hearing Request No. 2, the
5 Company noted that when its winter peak demand is greater than its
6 summer peak demand obligation, it buys energy from the pool. When
7 this situation occurs, it does not mean that Kentucky Power suffers from
8 a reliability issue, but instead it means it is more economic for Kentucky
9 Power to purchase energy from within the PJM market than for
10 Kentucky Power to construct new resources, especially since there is
11 sufficient capacity available in PJM to meet Kentucky Power’s winter
12 peak. As long as Kentucky Power meets its PJM summer peak demand
13 obligation, and PJM ensures that the entirety of the PJM System is
14 reliable on a year round basis, then it would become an economic matter
15 as to whether Kentucky Power should construct additional capacity to
16 avoid having to purchase during the winter period. Even if the Company
17 were to construct physical assets such as combustion turbine units to
18 satisfy its winter peak, Kentucky Power possibly would still purchase
19 energy from the PJM market during the winter as opposed to running its
20 newly built resources since PJM market resources could be cheaper to
21 operate than Kentucky Power’s new resources.²

22 The Company has carried out this strategy to effectuate the needed transition that
23 naturally occurred at the end of the Rockport UPA and the Company intends to
24 continue with this strategy until a long-term replacement solution is proposed by the
25 Company and approved by this Commission.

¹ Joint Review of Kentucky Power’s 2019 Integrated Resource Plan at 9, *In The Matter Of: Electronic 2019 Integrated Resource Planning Report Of Kentucky Power Company*, Case No. 2019-00443 (Feb. 25, 2021).

² *Id.* at 16.

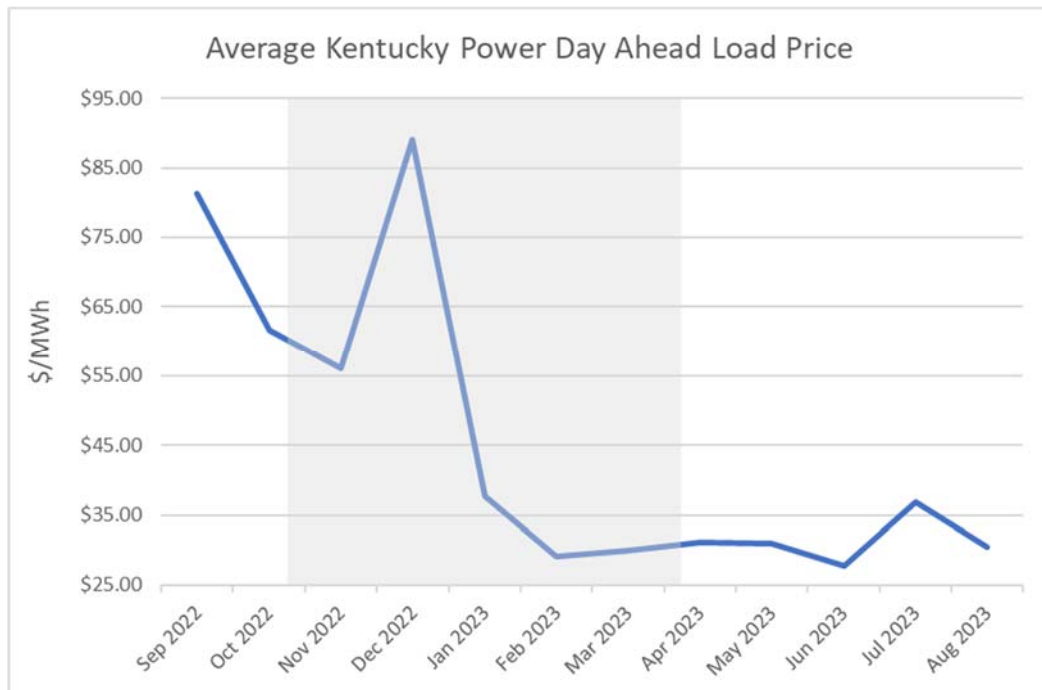
Rockport UPA Replacement Capacity & Energy Cost Comparison		
2022 Rockport UPA Cost	\$	92,108,647
2022 Capacity Charge	\$	5,792,329
Total 2022 Rockport Cost of Service	\$	97,900,976
Replacement Energy and Capacity Cost	\$	31,397,143
Cost of Service Reduction Post UPA	\$	66,503,833

V. COAL INVENTORY MANAGEMENT

1 **Q. PLEASE DESCRIBE THE CHANGES IN ENERGY MARKET PRICES**
 2 **DURING THE FAC REVIEW PERIOD.**

3 A. As shown in Figure JMS-1 below, energy market prices were elevated in late 2022,
 4 peaked in December 2022 due to Winter Storm Elliott, and then experienced a
 5 significant drop in 2023.

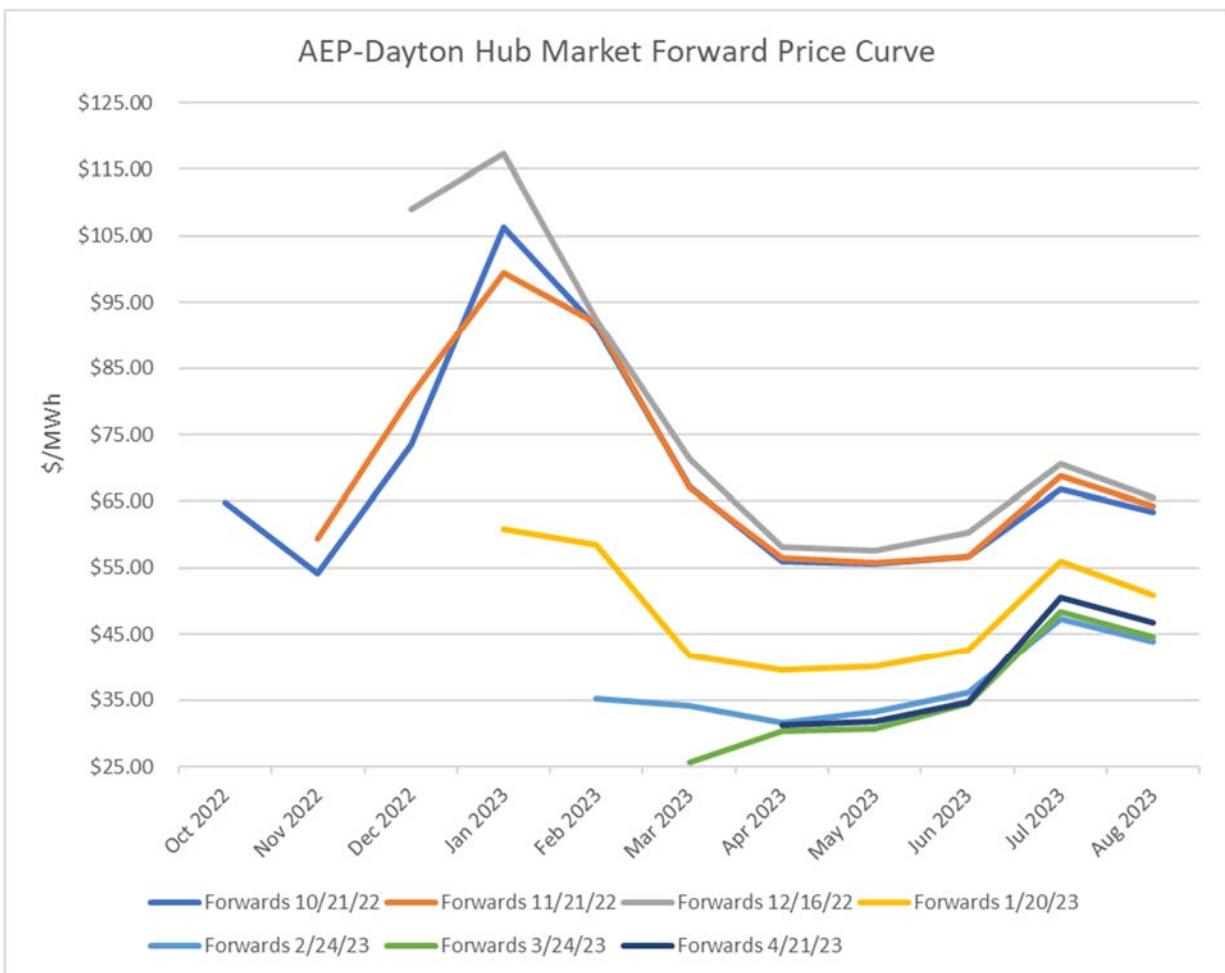
Figure JMS-1



1 **Q. WAS THIS SHARP DECLINE IN MARKET PRICIES EXPECTED?**

2 A. No. The Company, along with AEPSC personnel, monitor market forward prices on a
 3 regular basis. As shown in Figure JMS-2 below, the market forward curves evaluated
 4 in October, November, and December showed strong pricing through the winter season
 5 and elevated prices through 2023. The forward curve evaluated in January showed a
 6 decline while subsequent forward curves declined further from the January forwards.

Figure JMS-2



1 **Q. WHEN PRICES WERE ELEVATED, DID THE COMPANY HAVE**
2 **CONCERN WITH MAINTAINING COAL SUPPLY THROUGH THE**
3 **WINTER MONTHS IN THE REVIEW PERIOD?**

4 A. Yes. In late October 2022, when members of AEPSC Commercial Operations, AEP
5 Fuel Procurement, and Company employees met to discuss the current and projected
6 coal inventory balances, the projections indicated the Company would reach levels of
7 inventory below their target levels. Based on market forward prices on October 21,
8 2022, projections indicated that the Mitchell plant would be below 15 days³ of full load
9 burn by the end of February while the remainder of 2023 would see PJM energy market
10 prices would be above the variable cost of generating energy from the Mitchell units.

11 **Q. HOW DID THE COMPANY ADDRESS THIS CONCERN?**

12 A. The Company continued its coal conservation offer strategy, by including a price adder
13 in its daily market-based offer to PJM its Mitchell generating units during November
14 2022.

15 **Q. DID THE COMPANY UTILIZE THE COAL CONSERVATION OFFER**
16 **STRATEGY DURING THE ENTIRE REVIEW PERIOD?**

17 A. No. When the Company personnel met with AEPSC Commercial Operations and
18 AEPSC Fuel Procurement in late November 2022, the analysis reviewed at that time
19 projected February 2023 ending high sulfur coal inventory to be 17 days of full load
20 burn and its low sulfur coal inventory to be 15 days. As a result, the Company ceased

³ During 2022, the Company had set coal inventory targets for the Mitchell plant to be 15 days of full load burn for high sulfur coal and 30 days of full load burn for low sulfur coal. These levels are set to manage risks in delivery and supply while still maintaining unit reliability.

1 using the coal conservation offer strategy. During the Company meeting in December
2 2022, forecasted coal inventories were expected to remain above minimum target levels
3 through February 2023 and build prior to the summer season, even based on the higher
4 forward curve used to develop these estimates. As market prices fell in 2023 and the
5 Company's energy market forward price curve reflected lower prices to continue, the
6 Company confirmed that the coal conservation offer strategy was no longer needed to
7 maintain coal inventory.

VI. PERFORMANCE OF RESOURCE PLANNING AND PROCUREMENT

DECISIONS DURING WINTER STORM ELLIOT

8 **Q. PLEASE DESCRIBE THE SYSTEM CONDITIONS DURING WINTER**
9 **STORM ELLIOTT.**

10 A. Winter Storm Elliott was an extreme cold weather event that included blizzards, high
11 winds, snowfall and record cold temperatures across much of the United States. Winter
12 Storm Elliott occurred December 23, 2022 through December 26, 2022, in the PJM
13 region (the "Winter Storm Elliott Period").⁴ The resulting load during this period of
14 time was an extreme outlier in both magnitude and timing, with the Christmas Eve load
15 being 40 gigawatts higher than the second highest in the past decade.⁵ The drastic
16 temperature drop and higher than forecasted load caused PJM to dispatch generation
17 reserves, many of which failed to perform.

⁴ PJM defined the Winter Storm Elliott Period as December 23, 2022 through December 26, 2022, and this is the time period used for purposes of this testimony. The Company also has referred to the Winter Storm Elliott Period when describing its generation performance as December 23, 2022 through December 27, 2022.

⁵ <https://www.pjm.com/-/media/committees-groups/committees/mic/2023/20230111/item-0x---winter-storm-elliott-overview.ashx>.

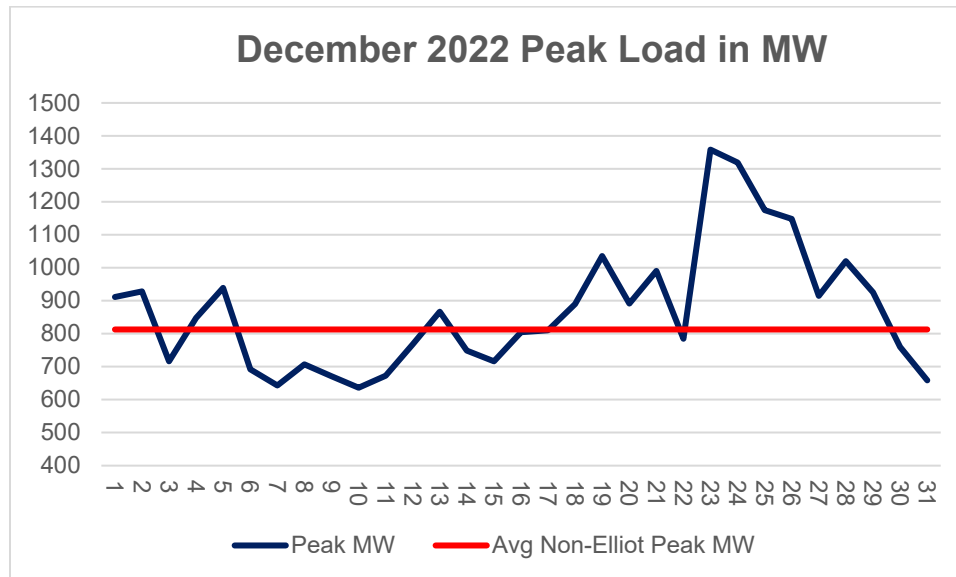
1 The unanticipated high load and rapid load increase combined with generation
2 outages due to cold weather and fuel issues resulted in Performance Assessment
3 Intervals (“PAIs”) on December 23, 2022, and December 24, 2022. PAIs are triggered
4 when PJM declares an emergency action in the RTO. During the PAIs, the load
5 weighted LMP reached the system marginal price cap of \$3,700/MWh as a result of
6 the supply/demand imbalance during emergency operations. Generation resource
7 outages during Winter Storm Elliott peaked at 48,080 MW on December 24, 2022.
8 Roughly 11,000 MW of those outages were due to a lack of natural gas supply.⁶

9 **Q. DID THE COMPANY EXPERIENCE EXTREME LOAD CONDITIONS**
10 **DURING WINTER STORM ELLIOTT?**

11 A. Yes. The Company’s peak load during the Winter Storm Elliott Period was 1,358 MW,
12 46% higher than the Company’s previous 12 month average peak demand (“12CP”) of
13 929 MW. In 85 of the 96 hours during the event, the Company’s hourly average load
14 was higher than its most recent 12CP demand.

⁶ PJM 2022 State of the Market Report, pages 210-211.

Figure JMS-3



1 Figure JMS-3 illustrates the Company's daily peak demand during the month of
2 December 2022. As can be seen, there is an extreme increase in demand during Winter
3 Storm Elliott, including the 1,358 MW peak during hour ending 2100 on December 23,
4 2022. The flat line in Figure JMS-3 is the average peak demand during the non-Winter
5 Storm Elliott days in December (813 MW). The Company's peak demand during
6 Winter Storm Elliott was 545 MW higher than the average peak demand for the other
7 27 days of December 2022. Before this, one has to go back to January 2018 to find a
8 Company peak higher than what was experienced during Winter Storm Elliott, and the
9 Company has only had eight monthly peaks in the last decade greater than the Winter
10 Storm Elliott peak. This illustrates the magnitude of the demand on the Company's
11 system resulting from Winter Storm Elliott's extreme cold weather. This high load
12 when combined with PJM-wide emergency operations resulted in extremely high
13 system energy pricing at which the Company had to purchase its load obligation, in
14 excess of its available supply that would otherwise have netted financially and reduced

1 such load costs, from the PJM spot energy market. Figure JMS-4 and Figure JMS-5
 2 below show real-time LMPs over the month of December 2022 to put into context how
 3 much of an outlier pricing during Winter Storm Elliott was and provide a narrower
 4 view on the hourly pricing during Winter Storm Elliott.

Figure JMS-4

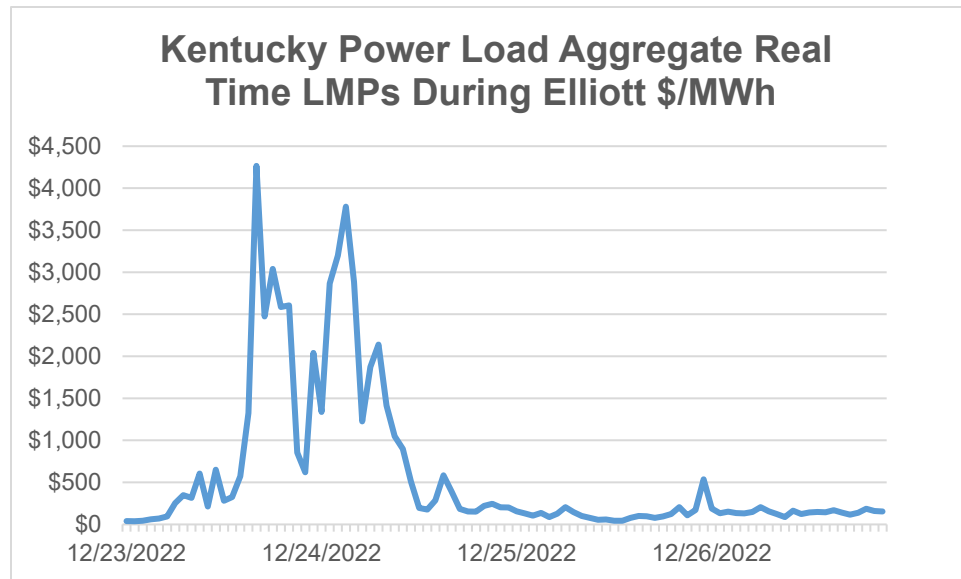
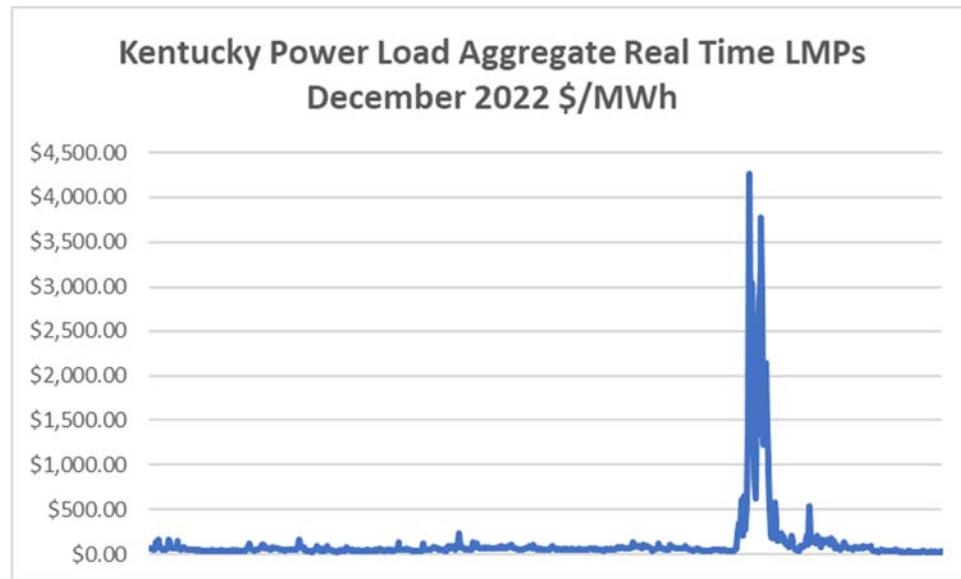


Figure JMS-5



1 **Q. HOW DID THE COMPANY'S GENERATION RESOURCES PERFORM**
 2 **DURING THE WINTER STORM ELLIOTT EVENT?**

3 A. During Winter Storm Elliott, none of the Company's generating units were forced out
 4 of service. Both Mitchell Units operated continuously throughout Winter Storm Elliott.
 5 Mitchell Units 1&2 operated at 80.31% and 74.11% net capacity factors⁷ respectively.
 6 The Mitchell Units performed at a level above the total PJM coal fleet which achieved
 7 a net capacity factor of 73.03%⁸ during the same period of time. Big Sandy Unit 1 was
 8 in the midst of a PJM-approved planned outage during Winter Storm Elliott. Company

⁷ December 23-27 period.

⁸ Source: PJM Dataminer2 and PJM 2022 State of the Market Report.

1 Witness Massie provides a more detailed description of the performance of the
2 Company's generation resources during the Winter Storm Elliott Period.

3 **Q. DID THE COMPANY INCUR A CAPACITY PERFORMANCE PENALTY**
4 **DURING THE WINTER STORM ELLIOTT PAIS?**

5 A. No, due to the Company's prudent management of its available coal supplies during
6 2022, the Mitchell Plant was available to run and as previously discussed operated
7 continuously during Winter Storm Elliott and the PAIs called by PJM. Furthermore,
8 the larger AEP Companies' FRR plan, in which Kentucky Power participates, also did
9 not incur a penalty as it benefited from the diversity of generation resource types and
10 locations utilized by the Companies in the plan.

11 **Q. HYPOTHETICALLY, WHAT WOULD HAVE BEEN THE FINANCIAL**
12 **RESULT HAD THE COMPANY PURCHASED TERM FINANCIAL POWER**
13 **DURING 2022 IN AN AMOUNT TO COVER THE COMPANY'S PEAK LOAD**
14 **DURING THE WINTER STORM ELLIOTT EXTREME COLD EVENT?**

15 A. Hypothetically speaking, had the Company known it would need 283 MW⁹ of
16 additional purchased power during Winter Storm Elliott, and had it purchased financial
17 power¹⁰ in advance of December 2022, customers' resulting fuel costs would have been
18 significantly higher. This is due to the high natural gas and power prices during 2022,
19 which caused the forward prices of financial power to be very high during 2022. Had
20 the Company transacted for this hypothetical amount of purchased power in any of the

⁹ Peak Kentucky Power load during Winter Storm Elliott minus generation resource (Mitchell and Big Sandy 1) ICAP.

¹⁰ The reference to financial power is referring to any purchase that is not asset specific.

1 five months leading up to December 2022, purchased power expenses for December
2 would have been higher than what the Company actually experienced in three out of
3 the five months. Based on this information, the only way a hypothetical financial
4 power transaction would have potentially benefitted the Company's customers would
5 have been based on arbitrary market timing. Said another way, if the Company by luck
6 alone had transacted based on October forward prices having perfect knowledge of the
7 unknown Winter Storm Elliott to come, purchased power expense could have been
8 lower than what was realized.

9 Had the Company bought that same amount of financial purchased power for
10 the balance of the winter (January-March in addition to December), rather than settling
11 its net load requirements at the spot market energy prices, total fuel costs would have
12 been materially higher under every scenario as can be seen in Figure JMS-6.

Figure JMS-6 - Hypothetical Forward Purchased Power Transactions

MW Needed to Cover Elliott Peak		283				
July Forwards						
	December	January	February	March	Total	
Forward Price	\$87.96	\$113.72	\$106.52	\$76.42		
Liquidated Price	\$83.85	\$36.22	\$27.81	\$28.80		
Increase in Purchase Power Exp	\$864,103	\$16,293,909	\$14,946,855	\$10,011,819	\$42,116,685	
August Forwards						
	December	January	February	March	Total	
Forward Price	\$108.04	\$136.92	\$126.07	\$78.07		
Liquidated Price	\$83.85	\$36.22	\$27.81	\$28.80		
Increase in Purchase Power Exp	\$5,085,802	\$21,171,569	\$18,659,357	\$10,358,721	\$55,275,449	
September Forwards						
	December	January	February	March	Total	
Forward Price	\$94.97	\$126.51	\$111.50	\$75.71		
Liquidated Price	\$83.85	\$36.22	\$27.81	\$28.80		
Increase in Purchase Power Exp	\$2,337,913	\$18,982,929	\$15,892,546	\$9,862,545	\$47,075,934	
October Forwards						
	December	January	February	March	Total	
Forward Price	\$73.45	\$106.30	\$91.27	\$67.17		
Liquidated Price	\$83.85	\$36.22	\$27.81	\$28.80		
Increase in Purchase Power Exp	(\$2,186,537)	\$14,733,898	\$12,050,914	\$8,067,062	\$32,665,337	
November Forwards						
	December	January	February	March	Total	
Forward Price	\$80.90	\$99.41	\$91.97	\$67.02		
Liquidated Price	\$83.85	\$36.22	\$27.81	\$28.80		
Increase in Purchase Power Exp	(\$620,220)	\$13,285,317	\$12,183,842	\$8,035,525	\$32,884,465	

1 A similar fact pattern would be true if the Company had purchased a block of
2 financial power to replace Big Sandy Unit 1's 295 MW of generation when it became
3 known that the emergent generator issue with Big Sandy Unit 1¹¹ would keep the unit
4 in a planned outage for all of December 2022. Had the Company purchased that block
5 of power¹² for the remainder of the month of December after the equipment issue was
6 discovered on December 2, 2022, total purchased power costs realized would not have
7 changed materially. Forward pricing for the balance of December 2022 was

¹¹ The issue was discovered on December 2, 2022.

¹² 295 x 696 hours in the balance of the month = 205,320 MWh of hypothetical purchased power transaction.

1 \$82.93/MWh and the average December 2022 liquidated price was \$83.85. Therefore,
2 less than a dollar per MWh (or roughly \$190,000 in total) of savings was hypothetically
3 possible. It should be noted that making such a transaction at a single point in time,
4 rather than layering in over time, can be financially risky. This is very evident when
5 looking out just a single month from December 2022 to January 2023, when the average
6 PJM spot market price shown in Figure JMS-6 dropped to just \$36.22/MWh.

7 **Q. DID THE COMPANY CURTAIL ITS NON-FIRM OR INTERRUPTIBLE**
8 **CUSTOMERS DURING WINTER STORM ELLIOTT TO REDUCE THE**
9 **AMOUNT OF PURCHASED POWER IT INCURRED?**

10 A. Yes, the Company called for curtailments of its interruptible customers¹³ on December
11 23, 2022, and December 24, 2022, and those customers reduced their operations to their
12 contracted firm service level during these events.

13 **Q. DID THE COMPANY HAVE TO ENGAGE IN ROLLING BLACKOUTS**
14 **DURING WINTER STORM ELLIOTT?**

15 A. No. The Company was able to provide reliable service to its customers during the
16 Winter Storm Elliott and had no power supply-related outages.

VII. CONCLUSION

17 **Q. DID THE COMPANY PROPERLY MANAGE ITS GENERATING ASSETS**
18 **AND THEIR PARTICIPATION IN PJM DURING THE SIGNIFICANT**
19 **CHANGES IN MARKET PRICES AND LOAD THAT OCCURRED DURING**
20 **THE REVIEW PERIOD?**

¹³ Tariff DRS and special contract.

1 A. Yes. Kentucky Power prudently managed its generating assets to the benefit of its
2 customers during a Review Period that included changing fuel constraints and
3 significant weather events.

4 **Q. DOES THIS CONCLUDE YOUR PRE-FILED TESTIMONY?**

5 A. Yes, it does.



Stegall Discovery Verification Form.doc

DocVerify ID: 026BB2FD-A14B-43F2-BE0D-8FF3DFC9AD25
 Created: August 21, 2024 12:13:25 -8:00
 Pages: 3
 Remote Notary: Yes / State: KY

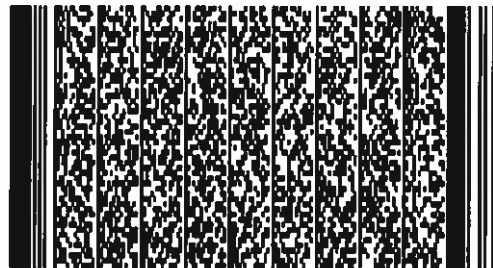
This document is a DocVerify VeriVaulted protected version of the document named above. It was created by a notary or on the behalf of a notary, and it is also a DocVerify E-Sign document, which means this document was created for the purposes of Electronic Signatures and/or Electronic Notary. Tampered or altered documents can be easily verified and validated with the DocVerify veriCheck system. This remote online notarization involved the use of communication technology

Go to www.docverify.com at any time to verify or validate the authenticity and integrity of this or any other DocVerify VeriVaulted document.

E-Signature Summary

E-Signature 1: Jason M. Stegall (JMS)
 August 23, 2024 06:04:13 -8:00 [ADBD2C6FAB3C] [167.239.221.101]
 jmstegall@aep.com (Principal) (Personally Known)

E-Signature Notary: Marilyn Michelle Caldwell (MMC)
 August 23, 2024 06:04:13 -8:00 [A02988BDA39D] [167.239.221.104]
 mmcaldwell@aep.com
 I, Marilyn Michelle Caldwell, did witness the participants named above electronically sign this document.



DocVerify documents cannot be altered or tampered with in any way once they are protected by the DocVerify VeriVault System. Best viewed with Adobe Reader or Adobe Acrobat. All visible electronic signatures contained in this document are symbolic representations of the persons signature, and not intended to be an accurate depiction of the persons actual signature as defined by various Acts and/or Laws



VERIFICATION

The undersigned, Jason M. Stegall, being duly sworn, deposes and says he is the Director Regulatory Services for American Electric Power Service Corporation, that he has personal knowledge of the matters set forth in the foregoing testimony and the information contained therein is true and correct to the best of his information, knowledge, and belief after reasonable inquiry.

Jason M. Stegall
Signed on 2024/08/23 15:44:13 -0500

Jason M. Stegall

Commonwealth of Kentucky)
)
County of Boyd)

Case No. 2024-00136

Subscribed and sworn to before me, a Notary Public in and before said County and State, by Jason M. Stegall, on August 23, 2024.

Marilyn Michelle Caldwell
Signed on 2024/08/23 15:44:13 -0500

Notary Public

MARILYN MICHELLE CALDWELL
ONLINE NOTARY PUBLIC
STATE AT LARGE KENTUCKY
Commission # KYNP71841
My Commission Expires May 05, 2027
Notary State: KY Date: 2024/05/03 08:04:13 PM ET

Notarial act performed by audio-visual communication

My Commission Expires May 5, 2027

Notary ID Number KYNP71841

0266B2FD-A148-43F2-8E0D-8FF3DFC9AD25 --- 2024/08/21 12:13:25 -05:00 --- Remote Notary

