

Kentucky Power Company  
KPSC Case No. 2024-00136  
Commission Staff's Second Set of Data Requests  
Dated September 9, 2024

**DATA REQUEST**

**KPSC 2\_1** Refer to Kentucky Power's response to Commission Staff's First Request for Information (Staff's First Request), Item 6. Explain why Kentucky Power purchased 2,914,800 MMBTU's of natural gas as a spot contract. Include in the response the total price that Kentucky Power paid.

**RESPONSE**

The referenced line item in Attachment 1 to the Company's response to KPSC 1-6 identifies the total spot purchases made throughout the six-month review period from Macquarie Energy, LLC ("Macquarie"). During the review period, Kentucky Power purchased a total of 2,914,800 MMBtu from Macquarie in the next-day or the intra-day market, to coincide with PJM dispatch instructions. The weighted average cost of such purchases was \$2.15 per MMBtu for a total of \$6,273,889. These costs are reflective of applicable market conditions during the review period.

Witness: Clinton M. Stutler

Kentucky Power Company  
KPSC Case No. 2024-00136  
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**DATA REQUEST**

- KPSC 2\_2** Refer to Kentucky Power's response to Staff's First Request, Item 17. Refer also to the Direct Testimony of Jason Stegall (Stegall Direct Testimony), at 7. Provide the following in Excel spreadsheet format with all formulas, rows, columns, and cells unprotected and fully accessible:
- a. The hourly energy purchased (MW's) and at what price;
  - b. The day ahead and real time locational marginal price (LMP) at each hour;
  - c. The hourly bids for the Mitchell 1 and 2 units and the Big Sandy unit broken out by cost and coal adder. Include in the response a breakdown for how much of the cost-based offer is fuel costs;
  - d. The price that PJM called each unit to run;
  - e. Hourly generation hours for both Mitchell 1 and 2 and Big Sandy unit for each month.

**RESPONSE**

- a. This information was provided in KPCO\_R\_KPSC\_1\_16\_Attachment1 through KPCO\_R\_KPSC\_1\_16\_Attachment6. The second tab, whose label includes "Hourly Purch Alloc" provides the hourly energy purchased to serve internal load and the total cost in columns F and G.
- b. Please see KPCO\_R\_KPSC\_2\_2\_Attachment1 for the hourly Day Ahead and Real Time prices for the Kentucky Power load zone.
- c. Please see KPCO\_R\_KPSC\_2\_2\_ConfidentialAttachment2 for the hourly offers submitted during the Review Period along with the component detail for each point in the daily market and cost-based offer curves.
- d. Please see KPCO\_R\_KPSC\_2\_2\_Attachment3 for the hourly Locational Marginal Prices (LMPs) at each generating unit at the Mitchell Plant. When the unit sells energy into the PJM energy markets, these are the prices that would be received.
- e. Please see KPCO\_R\_KPSC\_2\_2\_ConfidentialAttachment4 for the requested hourly generation.

Witness: Jason M. Stegall

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**DATA REQUEST**

- KPSC 2\_3** Refer to Stegall Direct Testimony at 3-4. Kentucky Power explained that it intends to continue utilizing short-term capacity purchases to fulfil its obligations to PJM as an FRR entity until a long-term replacement solution is proposed by Kentucky Power.
- a. Explain when Kentucky Power anticipates filing a long-term capacity plan with the Commission outside of its 2024 IRP.
  - b. Provide the average MWs purchased, along with the average price, every month under review that Kentucky Power purchases from the PJM market to meet its native load.

**RESPONSE**

- a. The Company believes that the question refers to the Company's 2022 IRP (Case No. 2023-00092). In addition to the Company's Application in 2024-00243, the Company continues to evaluate responses to its 2023 all source RFP and anticipates making any necessary filing(s) addressing its long-term capacity portfolio in the near future.
- b. Beginning December 8, 2022 with the expiration of the Unit Power Agreement and continuing through the end of the Review Period, the Company purchased 152.4 MW of capacity at a price of \$50 per Megawatt-day.

Witness: Lerah M. Kahn

Witness: Jason M. Stegall

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**DATA REQUEST**

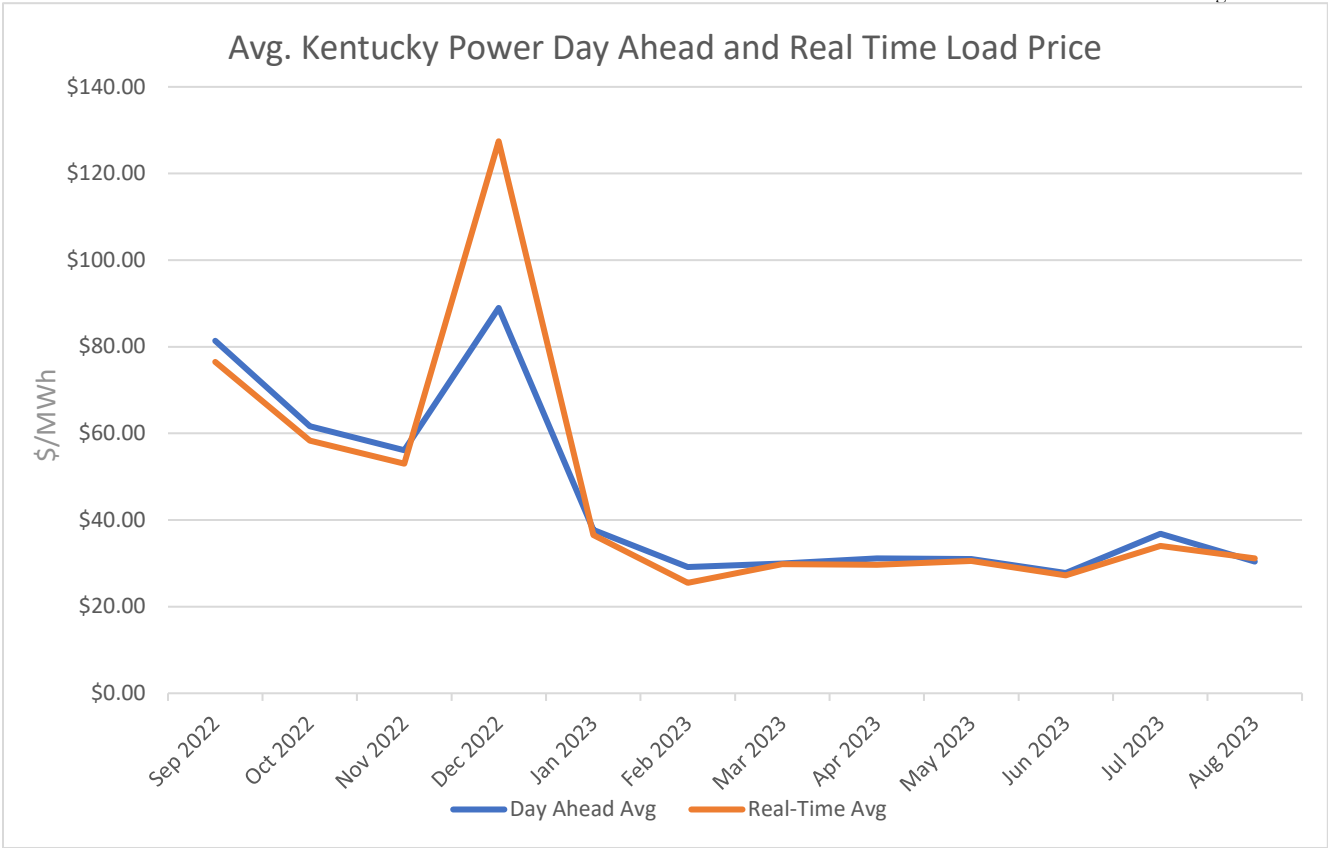
**KPSC 2\_4** Refer to Stegall Direct Testimony, Figure JMS-1, at 5. Provide a comparison of the day ahead LMP and the real time LMP in a similar figure.

**RESPONSE**

Please see KPCO\_R\_KPSC\_2\_4\_Attachment1 for the requested graphical presentation.

Witness: Jason M. Stegall





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**DATA REQUEST**

- KPSC 2\_5** Refer to the Stegall Direct Testimony at 7.
- a. Explain the process for how Kentucky Power would respond if the Mitchell station's coal supply dropped below the 15-day full burn threshold.
  - b. Explain how PJM penalizes utilities for its coal supply dropping below the required threshold. Include in the response if there is a monetary penalty and, if so, provide what that amount would be.

**RESPONSE**

- a. There is no specific process for responding to a situation where the Mitchell station's coal supply falls below the 15-day full burn target because Kentucky Power actively manages the fuel supply at the Mitchell station to avoid such a scenario. Kentucky Power does so to avoid falling below PJM's 10-day full burn threshold requirement and exposing the Company's customers to the operational restraints and potential penalties described in subpart (b) below. The only circumstance when Kentucky Power will allow the fuel supply at Mitchell to fall below the 15-day full burn target is when the units will be entering into a maintenance outage and the Company will have time to replenish the supply to above the 15-day full burn target prior the end of the outage period.
- b. Coal-fired generating units that fall below PJM's thresholds established in PJM Manual 13 may be placed in Maximum Emergency status, which means they would only be dispatched when needed by PJM for emergency conditions and would lose out on energy production that would otherwise be profitable. If the unit opts to remain online and not place itself in Maximum Emergency status, any inability to generate due to lack of sufficient fuel would result in a forced outage which may coincide with a Performance Assessment Interval (PAI), the penalty for which is calculated in accordance with the methodology identified in the PJM Open Access Transmission Tariff, Attachment DD. For the winter months during this Review Period, the PAI non-performance penalty was \$3,008.37 per Megawatt-hour.

Witness: Jason M. Stegall

Kentucky Power Company  
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**DATA REQUEST**

- KPSC 2\_6** Refer to the Stegall Direct Testimony, Figure JMS-6, at 15.
- a. Explain what Kentucky means by “Liquidated Price”.
  - b. Provide the net total cost that Kentucky Power incurred specifically during Winter Storm Elliot. Include in the response the total costs associated with operating the Mitchell units and purchasing energy from the PJM market.

**RESPONSE**

- a. Liquidated Price is the price received for the hedge at the time the underlying power is sold.
- b. Please see KPCO\_R\_KPSC\_2\_6\_Attachment1 for the requested information.

Witness: Jason M. Stegall

Kentucky Power Company  
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**DATA REQUEST**

**KPSC 2\_7** Refer to the Stegall Direct Testimony at 16. Provide which customers Kentucky Power curtailed, specifically large industrial customers and the specific amount of MWs.

**RESPONSE**

Please see KPCO\_R\_KPSC\_2\_7\_ConfidentialAttachment1 for the requested information.

Witness: Jason M. Stegall

Customer	Customer Account #	Date Curtailed	Start Time HE 1-24	End time HE 1-24	Average Hourly MW Reduction
		12/23/2022	20	23	2.0
		12/24/2022	7	21	2.1
		12/23/2022	19	23	3.2
		12/24/2022	7	21	3.3
		12/23/2022	19	23	1.6
		12/24/2022	7	21	1.6
		12/23/2022	19	23	0.9
		12/24/2022	7	21	0.9
		12/24/2022	7	21	5.9
		12/23/2022	19	23	1.0
		12/24/2022	7	21	1.0
		12/23/2022	19	23	0.5
		12/24/2022	7	21	0.5

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**DATA REQUEST**

**KPSC 2\_8** Refer to Kentucky Power's response to Staff's First Request, Item 1 Attachment 1. Provide an update to the table showing which purchases were for high sulfur and for low sulfur.

**RESPONSE**

Please see KPCO\_R\_KPSC\_2\_8\_Attachment1 for the requested information.

Witness: Kimberly K. Chilcote

For the period of November 1, 2022 through April 30, 2023

Counterparty	Type of Purchase	Total Tons <sup>1</sup>	Coal Type
ACNR Coal Sales, INC.	Contract	158,448	High Sulfur
Alliance Coal, LLC	Contract	79,129	High Sulfur
Alpha Thermal Coal Sales Co., LLC	Contract	4,041	Low sulfur
Alpha Thermal Coal Sales Co., LLC	Contract	5,720	Low sulfur
Alpha Thermal Coal Sales Co., LLC	Spot	5,784	Low sulfur
Alpha Thermal Coal Sales Co., LLC	Spot	12,878	Low sulfur
BAMM, Inc.	Contract	6,936	Low sulfur
Blackhawk Coal Sales, LLC	Contract	26,075	Low sulfur
Blackhawk Coal Sales, LLC	Contract	5,718	Low sulfur
Blackhawk Coal Sales, LLC	Contract	29,416	Low sulfur
Blackhawk Coal Sales, LLC	Spot	4,933	Low sulfur
Blackhawk Coal Sales, LLC	Spot	8,465	Low sulfur
Blackhawk Coal Sales, LLC	Spot	27,870	Low sulfur
Blackhawk Coal Sales, LLC	Spot	36,766	Low sulfur
Carbon Partners, Inc.	Spot	31,202	Low sulfur
Iron Coal Sales, LLC	Spot	3,904	High Sulfur
Noble Coal, LLC	Contract	6,687	Low sulfur
Pocahontas Sales and Logistics LLC	Contract	23,207	Low sulfur
River Trading Company	Spot	7,787	Low sulfur

<sup>1</sup>Represents Kentucky share

<b>TOTAL</b>	484,966
Total Contract	71%
Total Spot	29%

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**DATA REQUEST**

**KPSC 2\_9** Refer to Kentucky Power's response to Staff's First Request, Item 2, Attachment 1. Provide an update to the table showing which contract is for high sulfur and which is for low sulfur coal.

**RESPONSE**

Please see KPCO\_R\_KPSC\_2\_9\_Attachment1 for the requested information.

Witness: Kimberly K. Chilcote



This response is provided for the time period of November 1, 2022 through April 30, 2023 and lists all pertinent fuel contract information requested. Tonnage information is reported per Kentucky Power ownership share.

a. Contract/Purchase Order No.	b. Supplier Name	c. Location of Production Facilities	d. Method of Delivery	e. Tonnage Quantity Received During Review Period	f. Price Paid per Ton	Coal Type
03-00-21-003	BAMM, Inc.	MATTCO#1 Plant Mine- Floyd, KY PRIME MET/ED Sk Pop St, Wy,WV	Barge	6,936	\$72.91	Note 1 Low Sulfur
03-00-21-9M1	Blackhawk Coal Sales, LLC	Blue Creek Mine - Kanawha, WV	Barge	26,075	\$53.73	Note 1 Low Sulfur
03-00-21-9M2	Alpha Thermal Coal Sales Co., LLC	Republic Energy Mine - WV	Barge	4,041	\$55.48	Note 1 Low Sulfur
03-00-21-9M3	Alpha Thermal Coal Sales Co., LLC	Republic Energy Mine - WV	Barge	5,720	\$72.30	Note 1 Low Sulfur
03-00-21-9M4	Blackhawk Coal Sales, LLC	Blue Creek Mine - Kanawha, WV	Barge	5,718	\$72.70	Note 1 Low Sulfur
03-00-22-002	Noble Coal, LLC	Various Mines - Floyd, KY	Barge	6,687	\$175.19	Note 1 Low Sulfur
03-00-22-9M3	Alliance Coal, LLC	Tunnel Ridge Mine-Ohio, WV	Barge	79,129	\$87.55	Note 1 High Sulfur
03-00-23-002	Pocahontas Sales and Logistics LLC	Various Mines-Boone/Fayette,WV	Barge	23,207	\$162.75	Note 1 Low Sulfur
03-00-23-9M3	Blackhawk Coal Sales, LLC	Blue Creek Mine - Kanawha, WV	Barge	29,416	\$162.15	Note 1 Low Sulfur
07-77-05-900	ACNR Coal Sales, INC.	McElroy Mine - Marshall, WV	Conveyor Belt	158,448	\$44.87	Note 1 High Sulfur

Note 1 Reflects weighted average cost \$/ton

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**DATA REQUEST**

**KPSC 2\_10** Refer to Kentucky Power's response to Staff's First Request, Item 3. For both high and low sulfur coal, provide a table in excel format showing the estimated monthly ending inventory level, amount of coal burned, coal received, high and low sulfur full burn days' supply and target levels for the period of April 2022 through April 2023.

**RESPONSE**

Please see KPCO\_R\_KPSC\_2\_10\_Attachment1 for the requested information.

Witness: Kimberly K. Chilcote

Kentucky Power Company  
KPSC Case No. 2024-00136  
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Dated September 9, 2024

**DATA REQUEST**

- KPSC 2\_11** Refer to Kentucky Power's response to Staff's First Request, Item 6, and Item 8.
- a. Provide copies of the January 2023 and February 2023 requests for proposals and the bid tally sheets similar to those provided for coal solicitations showing which bids were taken and which were not taken.
  - b. For each gas contract, provide the contract number, when the contract was filed with the Commission and a copy of the contract.
  - c. Provide a table showing how each contracted gas price compares to spot gas price purchases.

**RESPONSE**

- a. Please see KPCO\_R\_KPSC\_2\_11\_Attachment1 for the requested information.
- b. Please see the table below for the resulting supply purchases and their respective filing dates with the Public Service Commission. Additionally see KPCO\_R\_KPSC\_2\_11\_Attachment2 for the as filed copies of the supply purchase confirmations.

<b>Supplier</b>	<b>Contract (ZKey)</b>	<b>Purchased Volume</b>	<b>Date Filed</b>
J. Aron and Company LLC	131082	20,000 MMBtu/day	February 14, 2023
Spire Marketing	132232	5,000 MMBtu/day	March 16, 2023
Sequent Energy	132233	5,000 MMBtu/day	March 16, 2023

- c. See table below for the requested information.

<b>Supplier</b>	<b>Contract (ZKey)</b>	<b>Settled Contracted Price</b>	<b>Weighted Average Spot Market Price for Contracted Period</b>
J. Aron and Company LLC	131082	\$2.62	\$2.03
Spire Marketing	132232	\$2.095	\$2.10
Sequent Energy	132233	\$2.105	\$2.10

Witness: Kimberly K. Chilcote

Witness: Clinton M. Stutler

**From:** Nick Grizzle  
**Sent:** Wednesday, January 25, 2023 10:17 AM  
**To:** aepgasprocurement  
**Cc:** Mark J Leskowitz; Melinda L Baine; Gina L Beyer; Stephanie L White; Matthew A Gant; Eder A Ayala  
Anzurez; Ivanh D Phung; Columbus Credit  
**Subject:** Kentucky Power Company / Baseload Natural Gas RFP / February 2023



January 25, 2023

**Kentucky Power Company (KPCO)  
February 2023 Baseload Natural Gas Supply**

AEP Service Corporation (AEPSC) on behalf of KPCO is hereby requesting proposals to supply baseload natural gas for February 2023.

**TERM:** February 1, 2023 – February 28, 2023  
**QUANTITY:** Up to **20,000** MMBtu/day on a baseload level of service. Proposals should allow for acceptance of all or a portion of your bid quantity.  
**PRICE:** Proposals should **only** be submitted using an Inside FERC index-based price or a fixed price.  
**RECEIPT POINTS:** Columbia Gas Transmission, LLC's system at TCO Pool.  
**OTHER:** Proposals that include unilateral options for the Seller will NOT be considered.

**Proposals must be submitted by 12:00 PM CPT, Thursday, January 26, 2023 and remain effective until 1:00 PM CPT, Thursday, January 26, 2023.**

Your proposal should be submitted via e-mail to [aepfuelsrfp@aep.com](mailto:aepfuelsrfp@aep.com). Evaluation and acceptance of any and/or all proposals will be at AEPSC's sole discretion. AEPSC has no obligation to accept any proposal, and may reject any proposal for any reason at any time in its sole judgment and discretion. AEPSC has no obligation to disclose the reason or reasons for rejection. Potential suppliers must have a signed agreement and credit approval with KPCO to have a proposal awarded.

We appreciate your interest in providing KPCO's natural gas requirements. If you have any questions, please contact me at (614) 370-0818.

Thank you,



**NICHOLAS R GRIZZLE | FUEL BUYER SR**  
[NGRIZZLE@AEP.COM](mailto:NGRIZZLE@AEP.COM) | D:614.716.1455 | C:614.370.0818  
1 RIVERSIDE PLAZA, COLUMBUS, OH 43215

**Clinton M Stutler**

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**From:** Clinton M Stutler  
**Sent:** Thursday, January 26, 2023 3:54 PM  
**To:** Nicholas R Grizzle  
**Subject:** RE: Kentucky Power Company / Baseload Natural Gas RFP Purchase / February 2023

Approved.

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**From:** Nicholas R Grizzle <ngrizzle@aep.com>  
**Sent:** Thursday, January 26, 2023 2:05 PM  
**To:** TradeConfirmations <tradeconfirms@aep.com>  
**Cc:** aepgasprocurement <aepgasprocurement@aep.com>; Columbus Credit <columbus\_credit@aep.com>; Mark J Leskowitz <mjleskowitz@aep.com>; Melinda L Baine <mlbaine@aep.com>; Gina L Beyer <glbeyer@aep.com>; Matthew A Gant <magant@aep.com>; Eder A Ayala Anzurez <eaayalaanzurez@aep.com>; Ivanh D Phung <idphung@aep.com>  
**Subject:** Kentucky Power Company / Baseload Natural Gas RFP Purchase / February 2023

Business Awarded

Kentucky Power Company ("KPCO") has purchased 20,000 MMBtu per day of baseload gas for February 2023 in response to a Request for Proposal ("RFP") as detailed below.

- 1) 20,000 MMBtu per day from J. Aron and Company LLC at the INSIDE FERC Columbia Gas, Appalachia first of month index plus \$0.14 located at the TCO Pool receipt point.

**Please prepare a confirmation for this purchase which is entered in Align as Zkey: 131082.**

Background

On Wednesday, January 25, 2023, AEP Service Corporation ("AEPSC") on behalf of KPCO sent an RFP for February 2023 baseload gas seeking offers of supply on the Columbia Gas Transmission, LLC ("CGT") pipeline system. The RFP was sent to twenty-nine credit approved KPCO counterparties. The terms of the RFP were as follows:

- Awarded gas would flow daily for the time period of February 1, 2023 – February 28, 2023.
- Up to 20,000 MMBtu per day of baseload gas.
- Only IFERC index-based prices and fixed prices would be considered.

- CGT's pipeline system at TCO Pool would be the receipt point.
- Proposals that include unilateral options for the Seller would not be considered.

On Thursday, January 26, 2023, in response to the RFP, KPCCO received two conforming offers from one credit approved counterparty. On our trading/procurement platform, Intercontinental Exchange ("ICE"), there were no competitive offers from credit approved KPCCO counterparties to include in our analysis. The RFP offers can be found in the illustration below.

**Index Price Projection**

Index	NYMEX	Basis Differential	Estimated IFERC Price
TCO Pool	\$2.840	-\$0.5500	\$2.290

**RFP Offers**

Counterparty	Quantity (MMBtu/day)	Index	Estimated IFERC Price	Basis Differential	Estimated Final Price
J. Aron and Company LLC (Offer 1)	20,000	IFERC TCO Pool	\$2.290	\$0.1400	\$2.430
J. Aron and Company LLC (Offer 2)	20,000	Fixed Price	N/A	N/A	\$2.460

Please let me know if you have any questions.

Thank you,



**NICHOLAS R GRIZZLE | FUEL BUYER SR**  
[NGRIZZLE@AEP.COM](mailto:NGRIZZLE@AEP.COM) | D:614.716.1455 | C:614.370.0818  
 1 RIVERSIDE PLAZA, COLUMBUS, OH 43215

**From:** Nick Grizzle  
**Sent:** Tuesday, February 21, 2023 10:20 AM  
**To:** aepgasprocurement  
**Cc:** Columbus Credit; Mark J Leskowitz; Melinda L Baine; Gina L Beyer; Matthew A Gant; Eder A Ayala Anzures; Ivanh D Phung  
**Subject:** Kentucky Power Company / Baseload Natural Gas RFP / March 2023



February 21, 2023

**Kentucky Power Company (KPCO)  
March 2023 Baseload Natural Gas Supply**

AEP Service Corporation (AEPSC) on behalf of KPCO is hereby requesting proposals to supply baseload natural gas for March 2023.

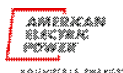
**TERM:** March 1, 2023 – March 31, 2023  
**QUANTITY:** Up to **10,000** MMBtu/day on a baseload level of service. Proposals should allow for acceptance of all or a portion of your bid quantity.  
**PRICE:** Proposals should **only** be submitted using an Inside FERC index-based price or a fixed price.  
**RECEIPT POINTS:** Columbia Gas Transmission, LLC's system at TCO Pool.  
**OTHER:** Proposals that include unilateral options for the Seller will NOT be considered.

**Proposals must be submitted by 10:00 AM CPT, Wednesday, February 22, 2023 and remain effective until 11:00 AM CPT, Wednesday, February 22, 2023.**

Your proposal should be submitted via e-mail to [aepfuelsrfp@aep.com](mailto:aepfuelsrfp@aep.com). Evaluation and acceptance of any and/or all proposals will be at AEPSC's sole discretion. AEPSC has no obligation to accept any proposal, and may reject any proposal for any reason at any time in its sole judgment and discretion. AEPSC has no obligation to disclose the reason or reasons for rejection. Potential suppliers must have a signed agreement and credit approval with KPCO to have a proposal awarded.

We appreciate your interest in providing KPCO's natural gas requirements. If you have any questions, please contact me at (614) 370-0818.

Thank you,



**NICHOLAS R GRIZZLE** | FUEL BUYER SR  
[NGRIZZLE@AEP.COM](mailto:NGRIZZLE@AEP.COM) | D:614.716.1455 | C:614.370.0818  
1 RIVERSIDE PLAZA, COLUMBUS, OH 43215

**Clinton M Stutler**

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**From:** Clinton M Stutler  
**Sent:** Wednesday, February 22, 2023 2:54 PM  
**To:** Nicholas R Grizzle  
**Subject:** RE: Kentucky Power Company / Baseload Natural Gas RFP Purchase / March 2023

Approved.

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**From:** Nicholas R Grizzle <ngrizzle@aep.com>  
**Sent:** Wednesday, February 22, 2023 2:23 PM  
**To:** TradeConfirmations <tradeconfirms@aep.com>  
**Cc:** aepgasprocurement <aepgasprocurement@aep.com>; Columbus Credit <columbus\_credit@aep.com>; Mark J Leskowitz <mjleskowitz@aep.com>; Melinda L Baine <mlbaine@aep.com>; Gina L Beyer <glbeyer@aep.com>; Matthew A Gant <magant@aep.com>; Eder A Ayala Anzurez <eaayalaanzurez@aep.com>; lvanh D Phung <idphung@aep.com>  
**Subject:** Kentucky Power Company / Baseload Natural Gas RFP Purchase / March 2023

Business Awarded

Kentucky Power Company ("KPCO") has purchased 10,000 MMBtu per day of baseload gas for March 2023 in response to a Request for Proposal ("RFP") as detailed below.

- 1) 5,000 MMBtu per day from Spire Marketing Inc. at the INSIDE FERC Columbia Gas, Appalachia first of month index plus \$0.015 located at the TCO Pool receipt point.
- 2) 5,000 MMBtu per day from Sequent Energy Management LLC at the INSIDE FERC Columbia Gas, Appalachia first of month index plus \$0.025 located at the TCO Pool receipt point.

**Please prepare a confirmation for these purchases which are entered in Align as Zkey: 132232 and 132233.**

Background

On Tuesday, February 21, 2023, AEP Service Corporation ("AEPSC") on behalf of KPCO sent an RFP for March 2023 baseload gas seeking offers of supply on the Columbia Gas Transmission, LLC ("CGT") pipeline system. The RFP was sent to twenty-nine credit approved KPCO counterparties. The terms of the RFP were as follows:

- Awarded gas would flow daily for the time period of March 1, 2023 – March 31, 2023.



- Up to 10,000 MMBtu per day of baseload gas.
- Only IFERC index-based prices and fixed prices would be considered.
- CGT's pipeline system at TCO Pool would be the receipt point.
- Proposals that include unilateral options for the Seller would not be considered.

On Wednesday, February 22, 2023, in response to the RFP, KPCO received four conforming proposals from three different credit approved counterparties. On our trading/procurement platform, Intercontinental Exchange ("ICE"), there were no competitive offers from credit approved KPCO counterparties to include in our analysis. The RFP proposals can be found in the illustration below.

**Index Price Projection**

Index	NYMEX	Basis Differential	Estimated IFERC Price
TCO Pool	\$2.183	-\$0.3800	\$1.803

**RFP Proposals**

Counterparty	Quantity (MMBtu/day)	Index	Estimated IFERC Price	Basis Differential	Estimated Final Price
Spire Marketing Inc. (Offer #1)	5,000	IF Columbia Gas, App.	\$1.803	\$0.0150	\$1.818
Sequent Energy Management LLC	10,000	IF Columbia Gas, App.	\$1.803	\$0.0250	\$1.828
Spire Marketing Inc. (Offer #2)	5,000	IF Columbia Gas, App.	\$1.803	\$0.0250	\$1.828
J. Aron and Company LLC	10,000	Fixed Price	N/A	N/A	\$1.830

Please let me know if you have any questions.

Thank you,



**NICHOLAS R GRIZZLE** | FUEL BUYER SR  
[NGRIZZLE@AEP.COM](mailto:NGRIZZLE@AEP.COM) | D:614.716.1455 | C:614.370.0818  
 1 RIVERSIDE PLAZA, COLUMBUS, OH 43215



**TRANSACTION CONFIRMATION FOR IMMEDIATE DELIVERY**

Transaction Date: 01/26/2023

Confirm Date: 01/26/2023  
 Align ID Ref #: 131082/AAV701  
 Contract Reference #: 1943  
 Cont. Status: ACTIVE

This Transaction Confirmation ("Confirmation") is subject to the Base Contract dated 10/01/2017 between Buyer and Seller (also identified as the above Contract Reference number, the "Contract") and we hereby confirm the following Transaction:

**Buyer:**

Kentucky Power Company(**KPCO**)  
 Attn: Confirmations - 3rd Floor, 303 Marconi Blvd.,  
 Columbus, OH, 43215  
**Phone:** 614-583-6463  
**Fax:** 614-583-1605

**Dealmaker:** KPCO

**Seller:**

J. Aron & Company LLC(**J ARON**)  
 85 Broad St 4th Floor, New York , NY, 10004  
**Phone:**  
**Fax:** 212-493-9849

**Dealmaker:** J ARON

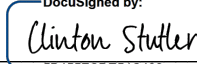

**Delivery Information:**

**Service Level:**Firm

Pipeline	Zone/Point	Start Date	End Date	Qty	Price
Columbia Gas Transmission LLC	TCO Pool	02/01/2023	02/28/2023	20,000 /MMBTU /DAY	Inside FERC: Appalachia - Columbia Gas , App. - + 0.1400

This Confirmation reflects the agreement between the parties reached on the above Transaction Date regarding the purchase and sale of natural gas. This Confirmation shall be treated in the manner specified in the Contract. Notwithstanding the foregoing, the failure to notify **KPCO** of disagreement about the terms of this Confirmation within two (2) Business Days of receipt shall be deemed to be an agreement to the terms of this Confirmation. Please return to AEP Trade Confirmations at [tradeconfirms@aep.com](mailto:tradeconfirms@aep.com).

**Kentucky Power Company**

DocuSigned by:  
  
 By: \_\_\_\_\_  
 Title: Manager- Natural Gas Procurement  
 American Electric Power Service Corporation,  
 Its agent and authorized signatory   
 Date: 01/26/2023

**J. Aron & Company LLC**

By: \_\_\_\_\_  
 Title: \_\_\_\_\_  
 Date: \_\_\_\_\_



### Certificate Of Completion

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Subject: Complete with DocuSign: JARON KPCCO (Baseload Gas) 2.1.23.pdf	
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Document Pages: 1	Signatures: 1
Certificate Pages: 3	Initials: 1
AutoNav: Enabled	Envelope Originator:
Envelope Stamping: Disabled	Lile Lunde
Time Zone: (UTC-05:00) Eastern Time (US & Canada)	700 Morrison Road
	Gahanna, OH 43230
	llunde@aep.com
	IP Address: 167.239.221.106


### Record Tracking

Status: Original	Holder: Lile Lunde	Location: DocuSign
1/26/2023 2:35:23 PM	llunde@aep.com	

### Signer Events

Nicholas R Grizzle  
 ngrizzle@aep.com  
 Security Level: Email, Account Authentication (None)

### Signature




Signature Adoption: Pre-selected Style  
 Using IP Address: 167.239.221.105

### Timestamp

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 Signed: 1/26/2023 2:43:38 PM

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 ID: c12142f4-1ef6-4fab-9235-a97ae05533aa

Clinton Stutler  
 cmstutler@aep.com  
 Manager - Natural Gas & Fuel Oil Procurement  
 Security Level: Email, Account Authentication (None)



Signature Adoption: Pre-selected Style  
 Using IP Address: 167.239.221.105

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 Signed: 1/26/2023 4:03:19 PM

**Electronic Record and Signature Disclosure:**  
 Accepted: 1/26/2023 4:00:30 PM  
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Intermediary Delivery Events	Status	Timestamp
Certified Delivery Events	Status	Timestamp
Carbon Copy Events	Status	Timestamp
Witness Events	Signature	Timestamp
Notary Events	Signature	Timestamp
Envelope Summary Events	Status	Timestamps
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Completed	Security Checked	1/26/2023 4:03:19 PM

<b>Payment Events</b>	<b>Status</b>	<b>Timestamps</b>
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<b>Electronic Record and Signature Disclosure</b>
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Electronic Record and Signature Disclosure created on: 5/30/2014 9:32:06 AM  
Parties agreed to: Nicholas R Grizzle, Clinton Stutler

**ELECTRONIC RECORD AND SIGNATURE DISCLOSURE**

Each party agrees that the electronic signatures, whether digital or encrypted, of the parties included in this Agreement are intended to authenticate this writing and to have the same force and effect as manual signatures. Electronic signature means any electronic sound, symbol or process attached to or logically associated with a record and executed and adopted by a party with the intent to sign such record.

Please confirm your agreement by clicking the 'I agree' button at the bottom of this document.



**TRANSACTION CONFIRMATION FOR IMMEDIATE DELIVERY**

Transaction Date: 02/22/2023

Confirm Date: 02/23/2023  
Aligne ID Ref #: 132232/AAV908  
Contract Reference #: 3683  
Cont. Status: ACTIVE

This Transaction Confirmation ("Confirmation") is subject to the Base Contract dated 1/17/2020 between Buyer and Seller (also identified as the above Contract Reference number, the "Contract") and we hereby confirm the following Transaction:

**Buyer:**  
Kentucky Power Company (**KYPCO**)  
Attn: Confirmations - 27<sup>th</sup> Floor, 1 Riverside Plaza,  
Columbus, Ohio 43215  
**Phone:** 614-583-6463  
**Fax:** 614-583-1605

**Seller:**  
Spire Marketing Inc. (**SPIRE**)  
720 Olive Street, Room 1512, St. Louis 63101  
**Phone:**  
**Fax:**

**Dealmaker:** KYPCO

**Dealmaker:** SPIRE

**Delivery Information:**  
**Service Level:** Firm

Pipeline	Zone/Point	Start Date	End Date	Qty	Price
Columbia Gas Transmission LLC	TCO Pool	3/1/2023	3/31/2023	5,000/MMBTU/DAY	Inside FERC: Appalachia - Columbia Gas , App. - +0.0150

This Confirmation reflects the agreement between the parties reached on the above Transaction Date regarding the purchase and sale of natural gas. This Confirmation shall be treated in the manner specified in the Contract. Notwithstanding the foregoing, the failure to notify **KYPCO** of disagreement about the terms of this Confirmation within two (2) Business Days of receipt shall be deemed to be an agreement to the terms of this Confirmation. Please return to AEP Trade Confirmations at [tradeconfirms@aep.com](mailto:tradeconfirms@aep.com).

**Kentucky Power Company**

**Spire Marketing Inc.**

DocuSigned by:  
  
By: \_\_\_\_\_  
Title: Manager - Natural Gas Procurement  
American Electric Power Service Corporation.  
Its agent and authorized signatory   
Date: 02/23/2023

By: \_\_\_\_\_  
Title: \_\_\_\_\_  
Date: \_\_\_\_\_



### Certificate Of Completion

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Certificate Pages: 3	Initials: 1
AutoNav: Enabled	Envelope Originator:
EnvelopeId Stamping: Disabled	Lile Lunde
Time Zone: (UTC-05:00) Eastern Time (US & Canada)	700 Morrison Road
	Gahanna, OH 43230
	llunde@aep.com
	IP Address: 167.239.221.106

### Record Tracking

Status: Original	Holder: Lile Lunde	Location: DocuSign
2/23/2023 8:04:42 AM	llunde@aep.com	

### Signer Events

Nicholas R Grizzle  
 ngrizzle@aep.com  
 Security Level: Email, Account Authentication (None)

### Signature



Signature Adoption: Pre-selected Style  
 Using IP Address: 167.239.221.106

### Timestamp

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Clinton Stutler  
 cmstutler@aep.com  
 Manager - Natural Gas & Fuel Oil Procurement  
 Security Level: Email, Account Authentication (None)



Signature Adoption: Pre-selected Style  
 Using IP Address: 167.239.221.106

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**Electronic Record and Signature Disclosure:**  
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<b>Electronic Record and Signature Disclosure</b>		



Electronic Record and Signature Disclosure created on: 5/30/2014 9:32:06 AM  
Parties agreed to: Nicholas R Grizzle, Clinton Stutler

### **ELECTRONIC RECORD AND SIGNATURE DISCLOSURE**

Each party agrees that the electronic signatures, whether digital or encrypted, of the parties included in this Agreement are intended to authenticate this writing and to have the same force and effect as manual signatures. Electronic signature means any electronic sound, symbol or process attached to or logically associated with a record and executed and adopted by a party with the intent to sign such record.

Please confirm your agreement by clicking the 'I agree' button at the bottom of this document.



**TRANSACTION CONFIRMATION FOR IMMEDIATE DELIVERY**

Transaction Date: 02/22/2023

Confirm Date: 02/23/2023  
Aligne ID Ref #: 132233/AAV909  
Contract Reference #: 1189  
Cont. Status: ACTIVE

This Transaction Confirmation ("Confirmation") is subject to the Base Contract dated 4/1/2015 between Buyer and Seller (also identified as the above Contract Reference number, the "Contract") and we hereby confirm the following Transaction:

**Buyer:**  
Kentucky Power Company (**KYPCO**)  
Attn: Confirmations - 27<sup>th</sup> Floor, 1 Riverside Plaza,  
Columbus, Ohio 43215  
**Phone:** 614-583-6463  
**Fax:** 614-583-1605

**Seller:**  
Sequent Energy Management LLC (**SEM2**)  
  
1200 Smith Street, Suite 900, Houston 77002  
  
**Phone:**  
**Fax:**

**Dealmaker:** KYPCO

**Dealmaker:** SEM2

**Delivery Information:**

**Service Level:** Firm

Pipeline	Zone/Point	Start Date	End Date	Qty	Price
Columbia Gas Transmission LLC	TCO Pool	3/1/2023	3/31/2023	5,000/MMBTU/DAY	Inside FERC: Appalachia - Columbia Gas , App. - +0.0250

This Confirmation reflects the agreement between the parties reached on the above Transaction Date regarding the purchase and sale of natural gas. This Confirmation shall be treated in the manner specified in the Contract. Notwithstanding the foregoing, the failure to notify **KYPCO** of disagreement about the terms of this Confirmation within two (2) Business Days of receipt shall be deemed to be an agreement to the terms of this Confirmation. Please return to AEP Trade Confirmations at [tradeconfirms@aep.com](mailto:tradeconfirms@aep.com).

**Kentucky Power Company**

**Sequent Energy Management LLC**

DocuSigned by:  
  
By: \_\_\_\_\_  
Title: Manager - Natural Gas Procurement  
American Electric Power Service Corporation.  
Its agent and authorized signatory  
Date: 02/23/2023

By: \_\_\_\_\_  
Title: \_\_\_\_\_  
Date: \_\_\_\_\_





### Certificate Of Completion

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Time Zone: (UTC-05:00) Eastern Time (US & Canada)	700 Morrison Road
	Gahanna, OH 43230
	llunde@aep.com
	IP Address: 167.239.221.106

### Record Tracking

Status: Original	Holder: Lile Lunde	Location: DocuSign
2/23/2023 8:03:13 AM	llunde@aep.com	

### Signer Events

Nicholas R Grizzle  
 ngrizzle@aep.com  
 Security Level: Email, Account Authentication (None)

### Signature



Signature Adoption: Pre-selected Style  
 Using IP Address: 167.239.221.106

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 Signed: 2/23/2023 8:22:02 AM

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Clinton Stutler  
 cmstutler@aep.com  
 Manager - Natural Gas & Fuel Oil Procurement  
 Security Level: Email, Account Authentication (None)



Signature Adoption: Pre-selected Style  
 Using IP Address: 167.239.221.106

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<b>Electronic Record and Signature Disclosure</b>		

Electronic Record and Signature Disclosure created on: 5/30/2014 9:32:06 AM  
Parties agreed to: Nicholas R Grizzle, Clinton Stutler

## **ELECTRONIC RECORD AND SIGNATURE DISCLOSURE**

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Please confirm your agreement by clicking the 'I agree' button at the bottom of this document.

Kentucky Power Company  
KPSC Case No. 2024-00136  
Commission Staff's Second Set of Data Requests  
Dated September 9, 2024  
Page 1 of 2

**DATA REQUEST**

- KPSC 2\_12** Refer to Kentucky Power's response to Staff's First Request, Item 15.
- a. Confirm that when a unit is in reserve shutdown status, no fuel is being consumed.
  - b. Explain whether the coal conservation strategy was still in place for Mitchell Unit 1, which resulted in the unit being placed in reserve shutdown for November 19, 2022 through November 29, 2022.
  - c. For Mitchell Unit 1, explain why the start-up failure on December 14, 2022, should not be classified as a forced outage.
  - d. Using the Mitchell Unit 1 for the 48 hours over the period December 13-14, 2022, as an example, explain the procedures and interactions between plant operators and the AEP/Kentucky Power personnel responsible for bidding in available generation units into the day ahead energy market that account for the unit being placed into reserve shutdown for approximately 12 hours.

**RESPONSE**

- a. Generally, during a reserve shutdown for Big Sandy plant no natural gas will be consumed. However, if a period of extended reserve shutdown were to occur, the Company has in the past requested a one-to-two-hour natural gas test burn to ensure that the unit is ready to start. This would occur after being notified by AEP Commercial Operations that the unit will most likely be restarted within 48 hours. During a reserve shutdown for Mitchell Plant, no coal will be consumed. No fuel was consumed during any reserve shutdown period from November 1, 2022 through April 30, 2023.
- b. While the coal conservation strategy was in place during November 12 – 29, 2022, as shown in the data provided in KPCO\_R\_KPSC\_2\_2\_ConfidentialAttachment2, please note that the increments in the market offer curves were only applied to levels of output above economic minimum, meaning that they had no impact on the initial commitment and dispatch of the units to that level of output. The strategy implemented in November 2022 was intended to reduce the level of output above economic minimum to only the most profitably priced hours.

Kentucky Power Company  
KPSC Case No. 2024-00136  
Commission Staff's Second Set of Data Requests  
Dated September 9, 2024  
Page 2 of 2

c. Per NERC Data Reporting Instructions for the Generating Availability Data System, a start-up failure is an outage that results when a unit is unable to synchronize within a specified start-up time following an outage or reserve shutdown. The start-up period for each unit is determined by the operator. A typical unit start-up occurs in three phases: warm up, synchronization, and ramp-up. NERC defines a start-up period to begin with the command to start and end when the unit is synchronized. A start-up failure begins when a problem preventing the unit from synchronizing occurs. The start-up failure ends when the unit is synchronized, another start-up failure occurs, or the unit enters another permissible state. Problems encountered during ramp-up that force the unit offline are considered outages, not start-up failure events. In the case for Mitchell Unit 1 on December 14, 2022, the unit suffered a start-up failure that occurred before synchronization with the grid and was coded as such based on data reporting instructions provided by NERC.

d. The plant notifies Commercial Operations once maintenance is complete and the unit is available for dispatch. Commercial Operations then updates the unit's commitment status with PJM, thereby letting PJM know the unit is available for commitment and dispatch to serve load.

Witness: Paul J. Massie

Witness: Jason M. Stegall

Kentucky Power Company  
KPSC Case No. 2024-00136  
Commission Staff's Second Set of Data Requests  
Dated September 9, 2024

**DATA REQUEST**

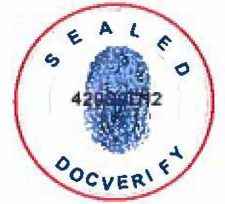
**KPSC 2\_13** Explain if Kentucky Power was subject to PJM Performance Assessment Interval penalties during the review period. If so, include an explanation for why and the amounts of the penalties.

**RESPONSE**

Kentucky Power was not assessed a financial penalty.

Witness: Jason M. Stegall





### Chilcote Discovery Verification Form.doc

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 Created: September 18, 2024 06:11:39 -8:00  
 Pages: 2  
 Remote Notary: Yes / State: KY

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#### E-Signature Summary

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

September 18, 2024 06:36:23 -8:00 [8FB6165D43D3] [107.77.195.32]  
 kkchilcote@aep.com (Principal) (Personally Known)

**E-Signature Notary: Marilyn Michelle Caldwell (MMC)**

September 18, 2024 06:36:23 -8:00 [8641062E6B2B] [167.239.221.107]  
 mmcaldwell@aep.com  
 I, Marilyn Michelle Caldwell, did witness the participants named above electronically sign this document.

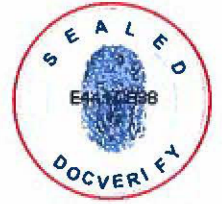


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 Remote Notary: Yes / State: KY

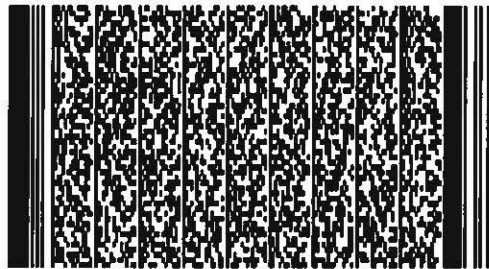
This document is a DocVerify VeriVaulted protected version of the document named above. It was created by a notary or on the behalf of a notary, and it is also a DocVerify E-Sign document, which means this document was created for the purposes of Electronic Signatures and/or Electronic Notary. Tampered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

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#### E-Signature Summary

**E-Signature 1: Paul J. Massie (PJM)**  
 September 17, 2024 08:02:51 -8:00 [58CCD8F65AA7] [167.239.221.107]  
 pjmassie@aep.com (Principal) (Personally Known)

**E-Signature Notary: Marilyn Michelle Caldwell (MMC)**  
 September 17, 2024 08:02:51 -8:00 [31DF306D823E] [167.239.221.107]  
 mmcaldwell@aep.com  
 I, Marilyn Michelle Caldwell, did witness the participants named above electronically sign this document.



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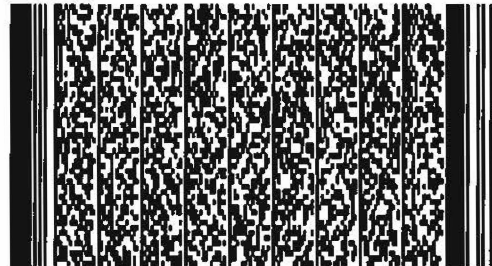
This document is a DocVerify VeriVaulted protected version of the document named above. It was created by a notary or on the behalf of a notary, and it is also a DocVerify E-Sign document, which means this document was created for the purposes of Electronic Signatures and/or Electronic Notary. Tampered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

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#### E-Signature Summary

**E-Signature 1: Jason M. Stegall (JMS)**  
 September 20, 2024 08:32:53 -8:00 [2CEE339EF4B6] [167.239.221.102]  
 jmstegall@aep.com (Principal) (Personally Known)

**E-Signature Notary: Marilyn Michelle Caldwell (MMC)**  
 September 20, 2024 08:32:53 -8:00 [1B79BCADFD34] [167.239.221.107]  
 mmcaldwell@aep.com  
 I, Marilyn Michelle Caldwell, did witness the participants named above electronically sign this document.



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**Stutler Discovery 2024-00136 Verification Form.doc**

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Pages: 2  
Remote Notary: Yes / State: KY

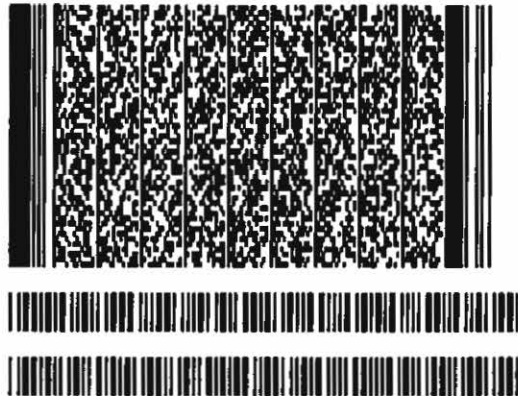
This document is a DocVerify VeriVaulted protected version of the document named above. It was created by a notary or on the behalf of a notary, and it is also a DocVerify E-Sign document, which means this document was created for the purposes of Electronic Signatures and/or Electronic Notary. Tampered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

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**E-Signature Summary**

**E-Signature 1: Clinton M. Stutler (CMS)**  
September 18, 2024 07:03:32 -8:00 [EA3CB0869E02] [167.239.221.105]  
cmstutler@aep.com (Principal) (Personally Known)

**E-Signature Notary: Marilyn Michelle Caldwell (MMC)**  
September 18, 2024 07:03:32 -8:00 [A4BA4FCE0D77] [167.239.221.107]  
mmcaldwell@aep.com  
I, Marilyn Michelle Caldwell, did witness the participants named above electronically sign this document.



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