

Kentucky Power Company
KPSC Case No. 2024-00144
Commission Staff's First Set of Data Requests
Dated August 2, 2024

DATA REQUEST

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

RESPONSE

Please see KPCO_R_KPSC_1_1_Attachment1 for the requested information. For purposes of the Company's monthly fuel adjustment clause back-up filings, Kentucky Power defines a spot purchase as an agreement with a term of one year or less. To permit the Commission to reconcile this response to the Company's fuel adjustment clause backup filings, the term "spot purchase" is likewise defined for purposes of KPCO_R_KPSC_1_1_Attachment1 as any purchase with a term of one year or less.

Witness: Kimberly K. Chilcote

For the period of May 1, 2023 through October 31, 2023

Counterparty	Type of Purchase	Total Tons ¹
ACNR Coal Sales, INC.	Contract	170,112
ACNR Coal Sales, INC.	Contract	72,023
Alliance Coal, LLC	Contract	124,367
Alpha Thermal Coal Sales Co., LLC	Contract	22,724
Alpha Thermal Coal Sales Co., LLC	Contract	12,244
BAMM, Inc.	Contract	18,772
Blackhawk Coal Sales, LLC	Contract	42,097
Blackhawk Coal Sales, LLC	Contract	12,278
Blackhawk Coal Sales, LLC	Contract	30,293
Blackhawk Coal Sales, LLC	Spot	42,754
Blackhawk Coal Sales, LLC	Spot	33,413
Case Coal Sales, LLC	Contract	8,108
Iron Coal Sales, LLC	Spot	8,695
Noble Coal, LLC	Contract	12,868
Pocahontas Sales and Logistics LLC	Contract	33,321
River Trading Company	Spot	6,499

¹Represents Kentucky Power Share

TOTAL	650,567
Total Contract	86%
Total Spot	14%

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- KPSC 1_2** For the period under review, list each coal purchase made under a long-term contract (one year or greater). For each purchase, list:
- a. Contract or purchase order number;
 - b. Supplier's name;
 - c. Location(s) of production facilities from which the coal is sourced;
 - d. The method of delivery (i.e., barge, truck, rail, other);
 - e. The actual quantity received; and
 - f. Price paid per ton.

RESPONSE

Please see KPCO_R_KPSC_1_2_Attachment1 for the requested information. For purposes of the Company's monthly fuel adjustment clause back-up filings, Kentucky Power defines a long-term contract as an agreement with a terms of more than one year. To permit the Commission to reconcile this response to the Company's fuel adjustment clause back-up filings, the term "long-term contract" is likewise defined for purposes of KPCO_R_KPSC_1_2_Attachment1 as any purchase with a term of more than one year.

Witness: Kimberly K. Chilcote

This response is provided for the time period of May 1, 2023 through October 31, 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	
03-00-21-002	Case Coal Sales, LLC	Mine Rite Mne - Flatgap, KY	Barge	8,108	\$82.52	Note 1
03-00-21-003	BAMM, Inc.	MATTCO#1 Plant Mine- Floyd, KY PRIME MET/ED Sk Pop St, Wy,WV	Barge	18,772	\$73.36	Note 1
03-00-21-9M1	Blackhawk Coal Sales, LLC	Blue Creek Mine - Kanawha, WV	Barge	42,097	\$55.17	Note 1
03-00-21-9M2	Alpha Thermal Coal Sales Co., LLC	Republic Energy Mine - WV	Barge	22,724	\$56.83	Note 1
03-00-21-9M3	Alpha Thermal Coal Sales Co., LLC	Republic Energy Mine - WV	Barge	12,244	\$71.28	Note 1
03-00-21-9M4	Blackhawk Coal Sales, LLC	Blue Creek Mine - Kanawha, WV	Barge	12,278	\$71.90	Note 1
03-00-22-002	Noble Coal, LLC	Various Mines - Floyd, KY	Barge	12,868	\$170.88	Note 1
03-00-22-003	ACNR Coal Sales, INC.	McElroy Mine - Marshall, WV	Conveyor Belt	170,112	\$82.34	Note 1
03-00-22-9M3	Alliance Coal, LLC	Tunnel Ridge Mine-Ohio, WV	Barge	124,367	\$87.38	Note 1
03-00-23-002	Pocahontas Sales and Logistics LLC	Various Mines-Boone/Fayette,WV	Barge	33,321	\$161.77	Note 1
03-00-23-9M3	Blackhawk Coal Sales, LLC	Blue Creek Mine - Kanawha, WV	Barge	30,293	\$165.24	Note 1
07-77-05-900	ACNR Coal Sales, INC.	McElroy Mine - Marshall, WV	Conveyor Belt	72,023	\$44.78	Note 1

Note 1 Reflects weighted average cost \$/ton including adjustments for quality as per the agreement.

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DATA REQUEST

- KPSC 1_3** As of the last day of the review period:
- a. State the coal inventory level in tons and in number of days' supply. Provide this information by generating station and in the aggregate.
 - b. Describe the criteria used to determine number of days' supply.
 - c. State the target coal inventory level for each generating station and for the total system.
 - d. If actual coal inventory exceeds the target inventory by ten days' supply, state the reasons for the excess inventory.
 - e. State whether any significant changes in the current coal inventory targets are expected within the next 12 months. If so, state the expected change and the reasons for this change.

RESPONSE

a. As of October 31, 2023 Kentucky Power's actual coal inventory levels (Company share) were as follows:
Mitchell High Sulfur*: 335,679 tons 67 Days of Supply
Mitchell Low Sulfur*: 347,824 tons 129 Days of Supply
*Company share

b. Days' supply is determined by dividing the Company's share of tons of coal in storage by the Company's full load burn rate (tons per day).
Mitchell High Sulfur:
 $335,679 \text{ tons in storage as of } 10/31/2023 = 67 \text{ days}$
 $4,994 \text{ (full load burn rate* - tons per day)}$

Mitchell Low Sulfur:
 $347,824 \text{ tons in storage as of } 10/31/2023 = 129 \text{ days}$
 $2,683 \text{ (full load burn rate* - tons per day)}$
*Company share

c. As of October 31, 2023,
Mitchell High Sulfur:
Target Inventory - 35 Days
Actual Inventory Days - 67 Days
Days Over/(Under) Target – 32 Days

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Mitchell Low Sulfur:
Target Inventory - 35 Days
Actual Inventory Days – 129 Days
Days Over/(Under) Target – 94 Days

d. Due to a very mild winter which resulted in reduced generation and lower natural gas and power prices, inventories began to grow at the end of 2022 and increased throughout 2023 to above target levels for Mitchell.

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

Witness: Kimberly K. Chilcote

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DATA REQUEST

- KPSC 1_4** List each written coal supply solicitation issued during the period under review.
- a. For each solicitation, provide the date of the solicitation; the type of solicitation (contract or spot); the quantities solicited; a general description of the quality of coal solicited; the period over which deliveries were requested; and the generating unit(s) for which the coal was intended.
 - b. For each solicitation, state the number of vendors to whom the solicitation was sent, the number of vendors who responded, and the selected vendor. Provide the bid tabulation sheet or corresponding document that ranked the proposals. (This document should identify all vendors who made offers.) State the reasons for each selection. For each lowest-cost bid not selected, explain why the bid was not selected.

RESPONSE

a-b. The Company did not issue any coal solicitations during the period under review.

Witness: Kimberly K. Chilcote

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DATA REQUEST

- KPSC 1_5** List each oral coal supply solicitation issued during the period under review.
- a. For each solicitation, state why the solicitation was not written; the date(s) of the solicitation; the quantities solicited; a general description of the quality of coal solicited; the period over which deliveries were requested; and the generating unit(s) for which the coal was intended.
 - b. For each solicitation, identify all vendors solicited and the vendor selected. Provide the tabulation sheet or other document that ranks the proposals. (This document should identify all vendors who made offers.) State the reasons for each selection. For each lowest-cost bid not selected, explain why the bid was not selected.

RESPONSE

a-b. The Company did not issue any coal solicitations during the period under review.

Witness: Kimberly K. Chilcote

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DATA REQUEST

KPSC 1_6 For the period under review, list each vendor from whom natural gas was purchased for generation and the quantities and the nature of each purchase (i.e., spot or contract).

RESPONSE

Please see KPCO_R_KPSC_1_6_Attachment1 for the requested information.

Witness: Clinton M. Stutler

Natural Gas Purchases
May 1, 2023 - October 31, 2023

Counterparty	Type of Purchase	Gross MMBTUs
Interstate Gas Supply, Inc	Spot	7,000
J. Aron & Company	Contract	1,829,000
Macquarie Energy LLC	Spot	3,940,100
Mercuria Energy American, Inc.	Spot	20,000
Sequent Energy Management, L.P.	Spot	72,000
Sequent Energy Management, L.P.	Contract	180,000
VITOL Inc.	Spot	233,800

Grand Total	6,281,900
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Total Contract	32%
Total Spot	68%

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DATA REQUEST

KPSC 1_7 For the period under review, state whether there were any instances in which a natural gas generating unit could not be operated when it otherwise would have run due to pipeline constraints or natural gas being unavailable.

RESPONSE

During the period under review, there were no instances in which a natural gas generating unit could not be operated, when it otherwise would have operated, due to pipeline constraints or natural gas being unavailable.

Witness: Clinton M. Stutler

Kentucky Power Company
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DATA REQUEST

KPSC 1_8 State whether there have been any changes to hedging activities for coal or natural gas purchases used for generation since the previous FAC review proceeding. If so, describe the changes in detail.

RESPONSE

Beginning in May 2023, Kentucky Power began applying weather-normalized forecasted customer load, by month, over a rolling 36-month period, comparing available fixed-cost resources in each month, to the forecasted load. At predetermined milestones of 36 months, 18 months, and 6 months before flow, Kentucky Power secured fixed-price hedges, inclusive of physical coal and physical natural gas, to cover the “target hedge percentages” of the weather-normalized customer load. These target hedge percentages escalate over time to result in an increasing portion of the cost of customer load becoming fixed. At each milestone, the lowest cost available alternative (i.e., physical coal, physical natural gas) is selected for procurement. Through this “layering” of resources, beginning 36-months in advance of a flow month for energy, Kentucky Power has also diversified the market risk of procuring fixed price fuel over time.

Witness: Kimberly K. Chilcote

Witness: Clinton M. Stutler

Kentucky Power Company
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DATA REQUEST

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

RESPONSE

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

Witness: Kimberly K. Chilcote

Witness: Clinton M. Stutler

Kentucky Power Company
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DATA REQUEST

- KPSC 1_10** State whether Kentucky Power is currently involved in any litigation with its current or former fuel suppliers or transportation vendors.
- a. If so, for each litigation:
- (1) Identify the supplier or vendor;
 - (2) Identify the contract involved;
 - (3) State the potential liability or recovery to Kentucky Power;
 - (4) List the issues presented; and
 - (5) Provide a copy of the complaint or other legal pleading that initiated the litigation and any answers or counterclaims. If a copy has previously been filed with the Commission, provide the date on which it was filed and the case in which it was filed.
- b. Identify and provide the current status of all litigation with suppliers or vendors.

RESPONSE

a-b. During the Review Period Kentucky Power was not involved in any litigation with current or former fuel suppliers or transportation vendors related to fuel or fuel transportation matters.

Witness: Kimberly K. Chilcote

Witness: Clinton M. Stutler

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Dated August 2, 2024

DATA REQUEST

- KPSC 1_11** For the period under review, state whether there have been any changes to Kentucky Power's written policies and procedures regarding its fuel procurement.
- a. If yes:
- (1) Describe the changes;
 - (2) Provide the written policies and procedures as changed;
 - (3) State the date(s) the changes were made; and
 - (4) Explain why the changes were made.
- b. If no, provide the date Kentucky Power's current fuel procurement policies and procedures were last changed, provide the date when they were last provided to the Commission, and identify the proceeding in which they were provided. If any current fuel procurement policies and procedures have not been provided to the Commission, provide those fuel procurement policies and procedures and explain why they were not previously provided.

RESPONSE

- a. Yes, Kentucky Power changed its written policies and procedures regarding fuel procurement during the review period.
- (1) The changes made to the policy and procedures document were initiated to better reflect the current procurement environment, as well as to make updates to Appendix A and Appendix B.
 - (2) Please see KPCO_R_KPSC_1_11_Attachment1. This updated document was also provided in Case No. 2024-00136 in response to KPSC 1-11.
 - (3) The effective date of these updates was September 20, 2023.
 - (4) The changes were made to better reflect the current procurement environment, to signify organizational changes and to update AEP's Principles of Business Conduct.
- b. N/A

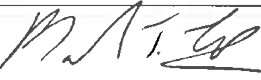
Witness: Kimberly K. Chilcote

Witness: Clinton M. Stutler



COVER SHEET

Organization: Regulated Fuel Procurement
Title: Regulated Fuel Procurement Policy and Procedures
Revision: September 2023

APPROVED BY:	DATE:	SIGNATURE:
Mark J. Leskowitz VP Regulated Fuel Procurement	9-20-2023	

AMERICAN ELECTRIC POWER

REGULATED FUEL PROCUREMENT POLICY AND PROCEDURES

September 2023

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INTRODUCTION

The purpose of this document is to describe the procurement policy and procedures (P&Ps) utilized by the regulated Fuel Procurement (FP) organization within the regulated Commercial Operations organization of American Electric Power Service Corporation (AEPSC). The regulated FP organization is responsible for the procurement of fuel, reagents and transportation services. The P&Ps were developed to help ensure that appropriate procurement methods are documented and followed.

This document summarizes the roles and responsibilities of the various groups within the regulated Fuel Procurement organization as they pertain to the procurement of fuel, reagents and transportation. This document also contains a general discussion of policies to be followed when participating in hedging activities.

This document replaces the Regulated Fuel Procurement Policy and Procedures document from 2018, which was the most recently approved version. This document is intended to be updated on an as-needed basis, to ensure consistency with current organizational structure and any relevant changes to company or regulatory policy.

1.0 Regulated Fuel Procurement (FP) Organization

1.1 Roles and Responsibilities of the Regulated FP Organization

The regulated FP organization operates within the regulated Commercial Operations organization of AEPSC and provides procurement and transportation services for the fleet of power plants owned and operated by American Electric Power (AEP) and its regulated operating companies, as well as the Ohio Valley Electric Corporation (OVEC) and the Indiana Kentucky Electric Corporation (IKEC). The Vice President (VP) of regulated FP reports to the Senior Vice President (SVP) of the regulated Commercial Operations organization of AEPSC. The regulated FP organization is responsible for procuring all the fuel (coal, natural gas and fuel oil), reagents (trona, urea, lime, limestone, activated carbon, sodium bicarbonate, anhydrous ammonia, calcium bromide, etc.) and the associated transportation services required by the applicable power plants, including the management and operation of Indiana Michigan Power Company's River Transportation Division's (RTD) barges and tow boats, for the delivery of coal and some reagents.

Regulated FP also provides market-based pricing information to AEP's regulated Commercial Operations organization. This information is used for generation-related functions on behalf of the regulated operating companies, OVEC and IKEC.

The regulated FP organization communicates with the Market Operations group daily and monthly so that load forecasts and fuel purchasing are effectively coordinated to ensure that plants receive adequate supplies of fuel to meet the planned dispatch for generating units over the short-term. In addition, the regulated FP organization communicates with the Commercial & Financial Analysis organization and provides fuel commitments so they can evaluate the overall hedge position of each AEP regulated operating company. For long-term procurement planning, regulated FP communicates with the groups that are responsible for developing the Integrated Resource Plan, which include, but is not limited to, the Corporate Planning & Budgeting organization.

The regulated FP organization supports, as necessary, fuel-related regulatory activities in response to state and federal agency requirements, including preparation of reports, testimony, schedules, and interrogatory responses.

1.2 Organizational Structure of Regulated FP

The VP of regulated FP has the ultimate responsibility to ensure that AEP's, OVEC's and IKEC's generating stations maintain appropriate and reliable supplies of fuel and reagents consistent with generating unit requirements and environmental regulations, as well as the means to transport those commodities to the plants.

The following functions report to the VP of regulated FP:

- **Fuel Procurement – Coal**
Responsible for the procurement of coal and the management of coal inventories for the regulated AEP operating companies', OVEC's and IKEC's power plants.
- **Fuel Procurement - Natural Gas and Fuel Oil**

Responsible for the procurement of natural gas supply and transportation services and fuel oil for the regulated AEP operating companies' power plants.

- **Coal Transportation, Logistics & Marketing**
Responsible for the transportation of coal and other bulk commodities, logistics, and railcar leasing for the regulated AEP operating companies', OVEC's and IKEC's power plants. Marketing activities of available capacity at Cook Coal Terminal are also managed.
- **Reagent & Coal Combustion Products Procurement**
Responsible for the procurement of products used to mitigate emissions from the regulated AEP operating companies', OVEC's and IKEC's power plants. Marketing activities associated with post combustion products are also managed.
- **Boat Operations**
Responsible for the management and operation of RTD barges and tow boats for delivery of coal to the coal fired generation plants as well as the delivery of some reagents. Dispatching of the fleet, accounting, and cross-charter benefits are realized through a contract with a large third-party barge operator.
- **Land and Mineral Development**
Responsible for the management and oversight of AEP obligations and leases, regarding primarily, the Dolet Hill and Sabine Mines owned by Southwestern Electric Power Company.

A current organizational chart for regulated FP is included as Appendix A of this policy.

1.3 Regulated FP Responsibilities

The responsibility for overall procurement and associated activities is that of the VP of regulated FP. As shown in the Organizational Chart in Appendix A, the Directors and Managers performing the regulated fuel procurement organization's functions shall report to the VP of regulated FP. Personnel from other AEPSC departments shall participate in these activities when it is deemed beneficial to the goals and objectives for AEP as a whole.

The Directors and Managers of regulated FP shall, in conjunction with others, oversee the development, negotiation, execution, and administration of supply and transportation agreements. The Directors and Managers shall exercise the prudent judgment, practical experience, organizational ability, and supervisory capacity necessary to administer the group's operations consistent with this policy.

Each Director and/or Manager is responsible for directing and/or performing the planning and execution of fuel, transportation, and reagent purchases for AEP's regulated operating companies', OVEC's and IKEC's generating stations, as well as supervision of the Fuel Buyers and Fuel Coordinators. The Director and/or Manager obtains specifications, availability, prices, and agreement conditions for fuel, transportation, and reagents. The Director and/or Manager also participates in agreement negotiations as requested and ensures that all pertinent agreements are properly coordinated, monitored, and executed.

The Directors and Managers, along with the Fuel Buyers and Fuel Coordinators, are also responsible for maintaining regular communications with plant employees, fuel suppliers, and

transporters to ensure that the terms of executed agreements are being consistently performed.

1.4 General Administrative Duties

The regulated FP organization shall subscribe to or obtain access to a representative number of trade and industry publications and reports by governmental agencies concerning prices for relevant materials and services. Regulated FP shall be knowledgeable of market conditions related to fuel, reagent, and transportation prices and availability. Regulated FP shall maintain appropriate contact with current and potential suppliers, and use other reliable sources of information to maintain a working knowledge of issues affecting pertinent material or service providers.

The employees of the regulated FP organization, as directed by management, will attend meetings and conferences related to fuel, reagents, and transportation. Regulated FP employees are also required to participate and/or assist in regulatory proceedings. These activities are necessary for the effective execution of this procurement policy.

To help assure that current and anticipated requirements for fuel and reagents are met, regulated FP personnel and management shall maintain adequate communications within the regulated FP organization, AEPSC, and its regulated operating companies, as well as OVEC and IKEC.

Regulated FP shall periodically review and consider changes, as necessary, to this policy.

2.0 Regulated FP Policy, Procedures and Implementation

2.1 Business Ethics and Corporate Compliance

Regulated FP employees shall be committed to high standards of business ethics and shall adhere to any and all applicable guidelines provided through AEP's Principles of Business Conduct. A copy of this document is provided as Appendix B to this document.

2.2 Regulated FP Considerations

AEP's overall Fuel Procurement Policy shall be used to secure adequate supplies of competitively priced coal, natural gas, reagents, fuel oil, and transportation services to meet generation, environmental, and operational requirements, while recognizing the dynamic nature of the various associated markets, environmental standards, and regulatory requirements. To accomplish these objectives the Company maintains, as appropriate, a mix of physical inventories and a portfolio of long-term and short-term agreements for firm supplies of fuels, reagents, and transportation suitable for its generating units. AEP's procurement strategy is to provide an appropriate amount of fuel, reagents, and transportation with supply flexibility when possible, considering the Company's long-term agreements and market conditions. It is also the policy of regulated FP to meet these materials and service requirements at the lowest reasonable delivered cost over time, consistent with satisfying the above-stated objectives.

Those responsible for the procurement of commodities and services shall be organized and staffed to carry out the procurement of coal, natural gas, reagents, fuel oil, and transportation in an efficient and practical manner. All commodities and services shall be purchased with due consideration of all relevant factors, including but not limited to: competitive pricing, the quantity needed to maintain an appropriate supply, the quality required to optimize the operating characteristics of the generating stations, the need to meet any applicable environmental standards, the production capability as well as the financial reliability of the supplier, existing contractual obligations, and the ability to address emergencies or other unusual circumstances.

2.3 Proper Inventory Levels¹

The primary objective of the regulated FP organization shall be to ensure the availability of an adequate, reliable supply of fuel and reagents at the lowest, reasonable delivered cost for the generation of electricity. Consequently, decisions affecting solid fuel, fuel oil and reagent inventories shall be made in consideration of this primary objective. This policy shall allow for flexibility, permitting physical inventory levels of solid fuel, fuel oil, and reagents to be responsive to known and anticipated changes in conditions. Fuel and reagent inventory target levels shall be recommended by a cross-functional team and subject to the approval of senior management. This inventory target determination process helps ensure that each plant's needs are given due consideration and promotes efficiency of operation.

While inventory levels will vary over time, should the inventory of any one generating station vary significantly from the inventory level deemed appropriate, or should other variables (such as pending transportation issues, labor disruptions, contract disputes, weather, maintenance, etc.) present difficulties, then an appropriate course of action shall be implemented.

Other organizations within AEP that are responsible for developing financial and generation forecasts and the regulated FP organization, as applicable, shall participate in the preparation of the short-term, annual, and/or long-range projections for plant fuel, transportation, and reagent requirements. These projected requirements shall consider varying operational and environmental standards.

Regulated FP considers the overall economic and reliable supply balance between long-term, short-term, and spot agreements for fuel and reagents when making purchases. Additionally, regulated FP also considers current and projected system requirements; current and reasonably foreseeable market conditions; weather and seasonal conditions affecting production, consumption, transportation; any anticipated shortfall of existing supply agreement shipments; and anticipated changes in spot market prices when making purchases. Given existing contractual arrangements; contract expiration dates; existing and anticipated demand for electrical energy; status of inventory levels; changes to existing federal and/or state environmental standards or other laws; overall market conditions; and other temporary or long-term factors affecting procurement and transportation decisions; the mix of long-term and spot agreement purchases may be reasonably expected to vary given the particular circumstances of each generating plant.

¹ None of the natural gas-fired generating facilities owned by AEP currently have the ability to maintain natural gas inventory. These plants maintain a proper supply of fuel through a portfolio of firm and interruptible gas supply and transportation contracts. Furthermore, in the case of PSO and SWEPCO, both operating companies are party to off-site natural gas storage contracts.

3.0 Regulated Fuel Procurement Methods and Documentation

The use of the P&Ps may be reflected in one or more of the following:

3.1 Requests for Proposal (RFP)

When appropriate, and under the direction of the VP of regulated FP, RFPs should be issued to seek as many competitive offers as possible to obtain the lowest reasonable delivered cost, over time, for a service or material². RFPs can be sought for long-term contracts or spot orders and should be used whenever it is practical to do so. The RFP is sent to any number of qualified suppliers to competitively procure the commodity or service needed.

Any purchase decision resulting from responses to an RFP is documented in a manner to demonstrate that the Company acted prudently in procuring the commodity or service. This documentation includes an analysis of the offers received, and an explanation of the rationale used in awarding a contract.

3.2 Other Non-Solicited Offer Evaluation

At times, the regulated FP organization may be approached with unsolicited offers for commodities or services that warrant consideration, whether they are for short or long-term agreements. When considering these types of offers, regulated FP may use market-based indices, other contract prices, or other reasonable methods of comparison to determine whether or not it would be prudent to accept such an offer.

In the case that one of these types of offers is accepted, documentation is prepared describing the manner in which the offer was received, and also the rationale used to determine that the offer was reasonable. This documentation provides evidence that the action taken on behalf of the Company was prudent.

3.3 Emergency Procurement

Any one or more of the approaches described in this policy may be waived whenever it is determined that fuel or reagents must be purchased, or transportation services acquired, due to immediate and unavoidable circumstances that are not conducive to normal procurement practices. This determination shall be made by the VP of regulated FP, with the concurrence of the SVP of regulated Commercial Operations and other senior management as needed. Situations that could potentially lead to emergency actions may include, but are not limited to:

- Emergency or other extraordinary conditions or circumstances that make it reasonably certain that an adequate supply of acceptable fuel or reagents cannot be obtained from existing agreements and/or spot purchases.
- Inability to obtain appropriate quantities to cover unanticipated shortages of fuel or reagents that meet minimum quality requirements in a timely fashion using typical procurement practices.

² It should be noted that state regulatory commissions may have their own rules regarding the competitive procurement of fuels for power plants under its jurisdiction. This policy is not to supplant those state-specific requirements.

- Lengthy transportation related delays or suspensions.

3.4 Coal and Reagent Quality Specifications and Compliance

Permissible coal specifications and sources for AEP's regulated operating companies' plants, as well as OVEC's and IKEC's plants, have been set forth by the Steam Generation Equipment Engineering (SGEE) organization. The regulated FP organization utilizes these specifications and sources when soliciting coal offers from suppliers. When coal offers are being evaluated within the quality specification band, coal quality specifications are considered and financial adjustments made to provide a comparison on a like basis, which results in an "as delivered" cents per MMBtu cost. New sources are periodically considered through test burns to expand the choice of coal for each unit, which may produce more favorable financial results. Such sources must be approved by SGEE prior to continued use beyond the test burns.

Permissible reagent specifications and sources for AEP's regulated operating companies' plants, as well as OVEC's and IKEC's plants, are defined by the GET Engineering FGD Systems & Chemical Engineering organization. Reagent proposals consider a number of parameters which may include, among other things, performance guarantees, profitability, quality of service, past experience, financial qualifications and other factors deemed appropriate.

3.5 Negotiating Responsibility

The responsibility for negotiating final terms and provisions of fuel, reagent, and transportation agreements shall be a team effort under the overall guidance of the VP of regulated FP. A negotiating team could be comprised of any or all of the following individuals, depending on the type of agreement to be negotiated:

- VP Fuel Procurement (regulated)
- Manager – Coal
- Manager – Coal Transportation, Logistics & Railcar Fleet
- Manager – Reagents & Coal Combustion Products
- Managing Director – Boat Operations
- Director – Land & Mineral Development
- Manager – Natural Gas & Fuel Oil

While all contractual documents are reviewed by AEP's Legal Department, a negotiating team may call upon other departments (e.g. Credit, Strategic Initiatives, Corporate Planning & Budgeting, Regulatory, etc.) as needed to participate in or offer their expertise as to certain segments of the negotiations that relate to their particular area of expertise. This flexible approach gives each negotiating team a distinct advantage of providing specialists to the agreement development process who are most proficient in developing, recommending, and negotiating terms that are beneficial to the AEP regulated operating companies and customers, OVEC and IKEC.

3.6 Enforcement of Agreements

Supplier obligations under fuel, reagent, and transportation supply agreements shall be administered to ensure compliance by the suppliers and transporters consistent with AEP's

regulated Fuel Procurement Policy and Procedures. The regulated FP organization shall act judiciously, with due consideration of the desire to achieve compliance by the supplier as well as the need to maintain adequate supplies of fuel and reagents to meet plant and system requirements. Such compliance includes coal quality specification adherence as discussed in section 3.4.

If it is determined that a dispute related to a supplier's or transporter's non-performance is unlikely to result in an amicable resolution, the matter shall be referred to the VP of regulated FP. The VP shall undertake the appropriate action, including further negotiation or arbitration, if provided for by the agreement.

If the VP of regulated FP finds that an amicable resolution to a supplier's or transporter's non-performance cannot be achieved, litigation may be pursued with the involvement of AEP's Legal department, AEP operating company or OVEC/IKEC representative and under the guidance of other appropriate senior management.

4.0 Hedging Policy

4.1 Hedging Definition

A fuel hedge, as defined by AEP, is a forward contract that either serves to lock in the price of fuel for a specific volume and quality or provides the ability to do the same by the use of put and call options³. Such transactions may be settled either financially or physically. A financially settled transaction results in a net gain or loss, while physically settled contracts result in actual fuel deliveries at the agreed upon terms. Fuel hedges are to be used as tools to mitigate volatility in fuel purchase costs relative to market volatility.

4.2 Hedging Strategy

To support AEP's key business objectives, the regulated FP organization may enter into fuel hedges, when appropriate, with the purpose of reducing fuel price volatility. Regulated FP's primary means of hedging to reduce fuel price volatility is through a portfolio of physical supply agreements of various durations. Regulated FP is not currently active in entering into financial fuel hedge transactions.

5.0 Contract Administration

5.1 Overview and Responsibilities

Contract administration of existing and proposed contractual agreements for the purchase and sale of coal, reagents, and related transportation agreements, as well as for fuel oil, natural gas transportation, gypsum and ash marketing, made by regulated FP on behalf of AEP's regulated operating companies, OVEC and IKEC, is performed by the applicable FP group. FP interacts with Legal, Credit Risk Management, Fuel Accounting, Audits, Regulatory Services, and power plant personnel to ensure that contractual agreements represent the intended business relationship between the parties, and to monitor the regulated operating

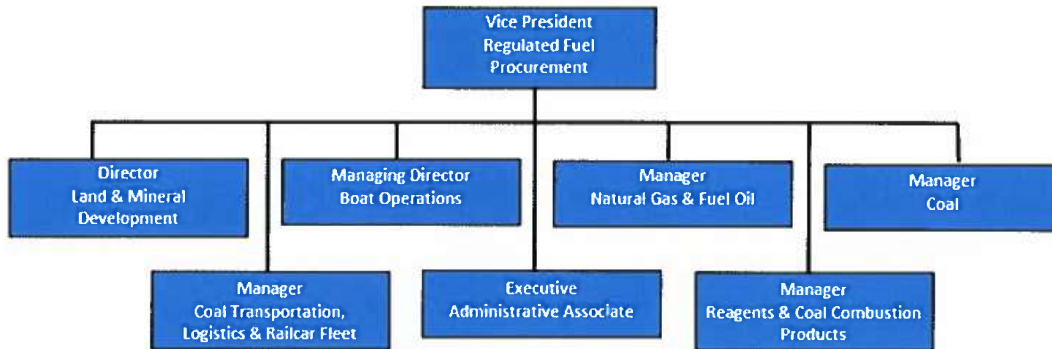
³ There is special accounting criteria for hedging with options. For example, written options rarely qualify for hedge accounting. Incorporating options in an accounting hedge strategy would be fully discussed with Financial Policy and Transaction Analysis as well as Market Risk Oversight, prior to execution.

companies' rights and obligations under existing agreements. Contract administration responsibilities include, but are not limited to:

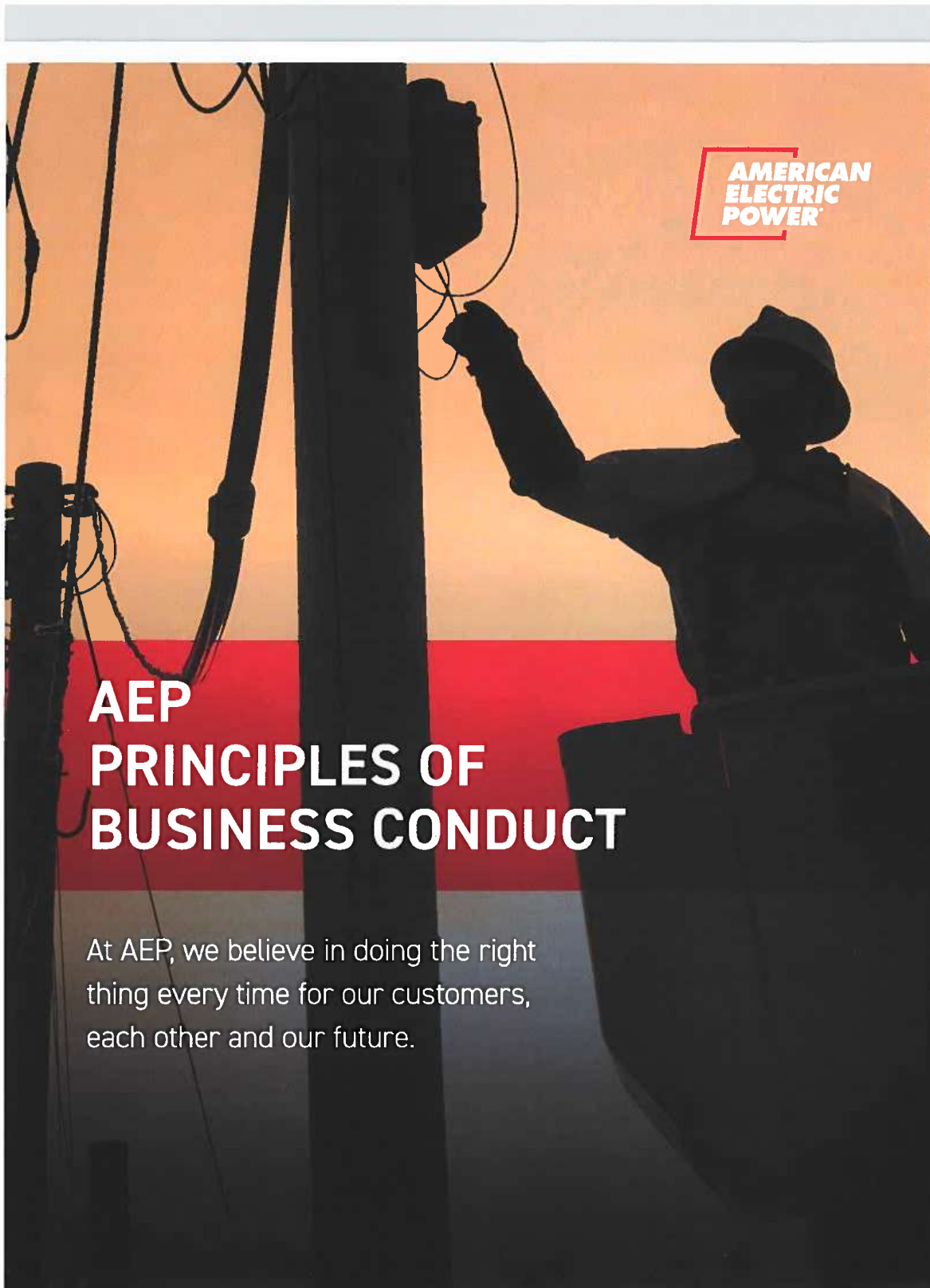
- Developing and/or reviewing contractual documents under existing and proposed agreements;
- Document tracking, distribution and retention;
- Monitoring contractual deadlines regarding volume elections, price reopeners, and term extension elections; issuing written notices to counterparties reflecting regulated FP option decisions;
- Determining contract value through pricing and rate development;
- Providing contractual review, including analysis of proposed settlements, changes in law, governmental impositions, and other pricing claims;
- Administering data requirements for internal fuel management systems which provide a database of historical costs and volumes for invoice support and reporting requirements;
- Monitoring and reporting volume commitment status and tiered pricing under transportation agreements;
- Administering coal scale calibration adjustments including determination of any pricing adjustments that may be applicable;
- Providing coal, reagent, fuel oil, natural gas, and transportation contract data for state and federal regulatory filings as needed;
- Administering Force Majeure claims initiated by regulated FP or counterparties;
- Providing accrual recommendations to the group responsible for fuel accounting.

While regulated FP initiates the pursuit of North American Energy Standards Board (NAESB) master natural gas supply contracts, Credit Risk Management is responsible for managing the negotiation process and retaining all documentation.

Appendix A
American Electric Power Service Corporation
Regulated Fuel Procurement
Organizational Chart



Appendix B
American Electric Power
Principles of Business Conduct



AEP PRINCIPLES OF BUSINESS CONDUCT

At AEP, we believe in doing the right thing every time for our customers, each other and our future.



Dear Fellow Employees,

This is a time of tremendous change and opportunity for our company. It's an honor and privilege to lead such an amazing team of employees. I've seen first-hand your commitment to innovation, to supporting the communities we serve and to ensuring that our customers can count on us every day to power their lives and businesses.

We continue to work together to protect our most valuable assets: all of you, our reputation and our brand. It's about integrity. We must always do what's best for AEP - whether that's for one another, our customers, our communities or our investors.

The *Principles of Business Conduct* is our guide. It defines both the ethical and legal standards by which we operate every day. No matter our role and responsibilities, we must act in accordance with the highest standards of business. None of us should accept anything less.

The *Principles* will help you understand AEP's policies, standards and expectations.

Please consider them your reference for how you carry out your work and how you treat others.

It will help us along the way as we strive to power a new and brighter future for our customers and communities.

A handwritten signature in black ink, appearing to read 'Julie Stroat'.

Julie Stroat
Chairman, President & Chief Executive Officer

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1.1 OUR CULTURE

At AEP, we believe in doing the right thing every time for our customers, each other and our future. Employees' daily actions are expected to reflect the culture we aspire to achieve at AEP. There are a variety of avenues available to employees to improve our culture. Examples include serving as a culture champion, creating and executing team culture action plans, expressing appreciation for others through the Power of Thank You and sharing their opinions and feedback through tools such as the annual AEP Employee Culture Survey.

For more information on AEP culture, visit the [Culture Website](#).

Expectations for Leaders

Leaders at AEP are held to a higher standard and are expected to create an atmosphere where employees feel valued, safe and respected. As a leader, you are also expected to support a culture of compliance where employees can report concerns and potential violations without fear of retaliation. AEP leaders should manage by motivation, not intimidation, and must demonstrate compliance with the *Principles of Business Conduct*.

[Link to Employee Handbook](#)



When in a leadership position, we have additional responsibilities for ethics and compliance, including:

- Build trust and create an environment that makes it safe for employees to speak up to share ideas and concerns;
- Meet our commitments with the appropriate degree of urgency;
- Listen and follow-up when employees speak up;
- Encourage employees to raise issues;
- Openly acknowledge when we are wrong and don't know the answer, and seek guidance for the appropriate course of action.
- Ensure all employees under your supervisor complete all required Ethics & Compliance training.



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1.2 SPEAK UP

Why Speak Up?

At AEP, we are committed to a culture of trust and transparency, ensuring the highest level of ethics and integrity. As an AEP employee, you have every right to demand the company and your co-workers uphold the highest ethical standards.

It is important that our employees can raise and discuss acts of misconduct or inappropriate behavior with confidence and without fear of retaliation. A "Speak Up" culture empowers an employee who has knowledge of activities which are illegal, violate company policy, or both, to report these activities to the proper company authorities.

[For more information on the Speak Up policy click here.](#)





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2.1 WORKPLACE SAFETY

We believe in Zero Harm because we care that everyone goes home in the same or better condition than when they came to work.

No aspect of operations is more important than the health and safety of our employees and customers. AEP manages our facilities in compliance with all applicable health and safety regulations. For us to do so, everyone at our facilities must follow all of our safety instructions and procedures.

To report an unsafe condition, please contact AEP Hazard Line 1-888-AEP-ASAP (1-888-237-2727), talk to your local manager or contact AEP Concerns Line at 1-800-750-5001 or online at www.aepconcernsline.com.

**AMERICAN
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POWER**

ZERO HARM™



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2.2 DIVERSITY, EQUITY & INCLUSION

AEP is committed to providing an inclusive workplace where discrimination and harassment are not tolerated. Employment-related decisions such as training, hiring, discipline, compensation and promotions will be made regardless of race, religion, gender, age, ethnicity, national origin, veteran status, disability or sexual orientation.

AEP is a dynamic and growing energy company that serves increasingly diverse communities and customers. This requires AEP to have a diverse, inclusive workforce and a long-term strategy that sustains a culture in which our employees, customers and suppliers feel respected, valued and connected.

Diversity and inclusion are integral elements in our values. They are crucial to sustaining our culture, and fundamental to our continued business success.

We expect our employees to conduct themselves in a manner that contributes to a healthy, safe and productive work environment. Harassment of any kind will not be tolerated. You are expected to support AEP's inclusive culture and comply with the [Rules of Conduct found in the AEP Employee Handbook](#).

We are committed to a culture where differences are valued and recognized as a significant positive influence on AEP's ability to serve our employees, customers, suppliers and other key stakeholders.



DID YOU KNOW

Discrimination is the denial of normal privileges or rights to one or more individuals based on an individual's race, color, ancestry, ethnicity, gender (sex), age, religion, national origin, level of education, political affiliation, physical appearance or disability, marital status, or sexual orientation.



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2.3 HUMAN RIGHTS POLICY

AEP defines human rights as rights inherent to all human beings without distinction of any kind, including race, color, sex, ethnicity, disability, veteran status, gender identify and expression, language, religion, political or other opinion, national or social origin, property, birth or any other protected status covered by applicable Federal, state or local law.

AEP Human Rights policy sets out standards for how a company respects human rights by having policies and processes in place to identify, prevent, mitigate and account for how it addresses human rights impacts.



DID YOU KNOW

Human Rights include:

- Diversity, Equity and Inclusion
- Discrimination & Harassment
- Freedom of Association & Collective Bargaining
- Safe and Healthy Workplace
- Workplace Security
- Forced Labor, Child Labor and Human Trafficking
- Work Hours, Wages and Benefits
- Environmental Responsibility & Social Justice
- Community and Stakeholder Engagement

[For more information on the Human Rights policy click here.](#)



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2.4 WORKPLACE CONDUCT HARASSMENT & BULLYING

A great part of our success is grounded in our open and collaborative work environment which helps us achieve excellence and meet the needs of our customers. We are and must be professional and honest with our colleagues, customers and business partners and treat each other with high respect and regard. AEP will not tolerate harassment of any kind.

For more information on the Policy Prohibiting Harassment click [here](#).



HOW TO MAINTAIN INTEGRITY IN THE WORKPLACE

- Do the right thing every time;
- Value the diversity of people, which includes their ideas and contributions generated from unique perspectives;
- Treat people with respect. Avoid any actions that someone might interpret as intimidation or bullying;
- Remember that what you find acceptable or funny may be offensive to others or in other cultures.



TELL ME MORE

Harassment is conduct that is intimidating, offensive, demeaning or hostile or that unreasonably interferes with:

- Jokes or insults about race;
- Unwelcome sexual advances or requests;
- Sharing unsolicited opinions about sexual orientation;
- Disparaging remarks about someone's nationality;
- Teasing a colleague about their religion;
- Sexually explicit gestures or posters.

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2.5 DYNAMIC WORKFORCE

Flexible Schedule

AEP promotes diversity & inclusion and a workplace culture that believes in doing the right thing every time for our customers, each other and our future. Flexible work schedules allow employees to achieve both personal and professional success while allowing AEP to continue operations.

While AEP's standard business hours are 8 a.m. to 5 p.m., Monday through Friday, flexible work schedules as agreed by the employee and supervisor can be a valuable work arrangement for both employees and the company. Reduced fuel emissions and commuting costs, improved work/life balance and enhanced customer service during non-traditional work hours are just some of the benefits of flexible work schedules.

If you have questions about working a flexible work schedule, consult with your supervisor or Human Resources to find out more. It should also be recognized that in certain circumstances, departmental responsibilities and size, labor agreements, handbook supplements and other requirements may affect your ability to work a flexible work schedule.



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Remote & Hybrid Workers

Work at AEP includes Remote, Hybrid, On-site and Field Work classifications; a classification is assigned to each AEP job to determine where employees will complete their work. Mandatory health and safety directives may alter work locations.

Working remotely is different for every employee; the Remote & Hybrid Work Policy establishes the expectations and requirements associated with remote and hybrid work.

As an employee, regardless of where you perform your job, it is AEP's expectation that all employees conduct themselves in a professional manner as outlined in the *Principles of Business Conduct* and the [Employee Handbook](#). With regard to those employees who will be working remotely or on a hybrid schedule, these employees need to adhere to the rules in the Remote & Hybrid Work Policy and the Remote & Hybrid Work Agreement.

Employees who have questions about working remotely are encouraged to consult their supervisor, Human Resources or the [Work Hub](#).



TELL ME MORE

Whether an employee is working remotely on a regular basis or working from somewhere other than their usual work location, the company expects that all employees will:

- Follow all Company policies and guidelines that would apply if working on-site at an AEP location;
- Be fit for duty and conduct themselves with a level of professionalism commensurate with the work they are performing;
- Provide status updates in the format and at the level of frequency agreed with the manager;
- Respond to phone, voicemail, text messages and other collaboration tools in a timely manner, in accordance with all guidelines;
- Use Company-issued or approved equipment and software when performing work for the Company.
- Accurately keep track of hours worked.

Contact your supervisor or Human Resources before relocating to ensure AEP is registered/qualified to do business in the desired new remote work location.

Update the Remote & Hybrid work agreement if the employees' remote work location changes.



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3.1 CUSTOMER EXPERIENCE

AEP's success lies in our ability to please our customers by meeting their needs in ways that improve their quality of life. This includes delivering safe, efficient and reliable services of consistently high value and promoting our products truthfully. If we please our customers, we will please our regulators, and our financial results will reward shareholders and our employees. AEP depends on long-term, continuing relationships with satisfied customers.

Cultivating a reputation of honest, compassionate and respectful communication is fundamental to this long-term approach.

HOW TO MAINTAIN CUSTOMER FOCUS

- Listen to our customers;
- Deliver value to our customers;
- Consider the customer impact of our decisions.



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3.2 CONFLICTS OF INTEREST

A conflict of interest may occur when an employee takes part in an activity or relationship that benefits them and not AEP. In other words, each party's personal gains are at odds with each other.

If an employee has a conflict of interest, it usually affects their decision-making at work, their ability to complete job duties, and their loyalty to AEP.

There are many situations where an employee could find themselves in a conflict of interest. In these examples, an employee could benefit from their actions to the detriment of AEP.

- When an employee owns a portion of a business that AEP does business with;
- When an employee refers AEP's customer to another business where they have financial interests;
- When an employee provides consulting services on the side to an AEP customer;
- Any use of AEP's assets for personal profit, such as information, technology, supplies, goods, etc.



TALKING IT THROUGH

Conflicts of interest are not always obvious. If you face a situation in which it looks like a conflict of interest may exist, ask yourself these questions:

- Would the situation, or the relationship, affect my decisions at AEP?
- Would I be putting my personal interest, or the interest of someone close to me, ahead of AEP's interest?
- Would I be embarrassed if someone at AEP knew all the facts?
- Do I, or does someone close to me, gain anything from my potentially divided loyalty?
- Would other people think that the situation, or relationship, might affect how I do my job?
- Would a customer or supplier wonder if we treated them fairly?



Conflict of Interest Disclosure

Employees are required to complete an annual conflict of interest disclosure. A disclosure allows an employee to document a relationship they have with another person or business that could have an impact on their ability to be objective when performing their job duties. Filing a disclosure is not uncommon or negative, it is simply a safeguard that enables Ethics & Compliance to provide you with the appropriate parameters to perform your job in an ethical manner.

Ethics & Compliance will review every disclosure and every employee will receive specific written guidance relative to their disclosure.

In addition to completing the annual conflict of interest disclosure employees should discuss any conflicts with their supervisor.



HOW TO AVOID A CONFLICT OF INTEREST

- Be transparent about your outside activities and relationships and watch for situations where they might interfere with your work or make it difficult for you to be objective;
- Do not use your position at AEP to benefit yourself, friends or family members;
- Never pursue (for yourself or others) business or corporate opportunities that you learned about in your work at AEP or through the use of company property or information.



EXAMPLES OF A POTENTIAL CONFLICT OF INTEREST

- A family member or friend works for an organization that does business or wants to do business with AEP or competes with us;
- You use company resources for your personal benefit or for the personal benefit of someone else;
- You supervise or are supervised (directly or indirectly) by a family member or friend;
- You are offered a gift or entertainment that is excessive or that might influence — or appear to influence — your business decisions.



3.3 ANTI-CORRUPTION & BRIBERY

AEP is committed to nurturing strong and productive relationships with our government officials. AEP requires employees and representatives to conduct AEP business before Government Officials openly and honestly, exercising the utmost integrity at all times.

AEP Anti-Corruption Policy expressly prohibits bribery and all other forms of corruption. AEP prohibits offering, promising, giving or authorizing others, such as lobbyists and political consultants, to give anything of value, tangible or intangible, either directly or indirectly, to any individual, including Government Officials, to gain an unfair business advantage or to influence improperly an official's decision-making with respect to the Company.

A bribe is never an acceptable cost of doing business

If a Government Official performs or offers to perform an official act for AEP in exchange for AEP's selection of a vendor or supplier:

- The Government Official's request must be reported immediately to AEP's Chief Compliance Officer;
- The vendor/supplier who is the subject of the requests shall be disqualified from consideration to provide any goods or services to AEP.

All Employees Must Review and Understand the Anti-Corruption Policy.



TELL ME MORE

What is Considered a Bribe?

In addition to cash, bribes may include:

- Gifts, especially gifts beyond a nominal value;
- Entertainment, hospitality and/or travel that is beyond reasonable business needs;
- Food and beverage;
- Personal services, favor or loans;
- Offers of employment;
- Charitable or political contributions;
- Awarding of contracts or business;
- Payments or benefits for services for an individual's family members or acquaintances, including offers of employment.



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Q: The State Senate Chief of Staff asked you if he could use the company's suite for a staff appreciation event at the arena for the upcoming NCAA men's basketball tournament?

A: The value of the suite and associated tickets are likely beyond a nominal value and would not be a permissible gift.

Q: The company would like to sponsor a breakfast reception for Legislators during the State Legislative Session. Other companies will be sponsoring various other events during the session. The breakfast will provide networking and educational opportunities for employees and legislators?

A: You should check with AEP Legal and confirm that the sponsorship was approved and disclosed if and as required under the [Political Engagement Policy](#).



WHAT TO DO TO AVOID BRIBERY & CORRUPTION

In addition to cash, bribes may include gifts, especially gifts beyond a nominal value.

- Know and follow our anti-corruption policies and all relevant anti-corruption laws. Remember that many anti-bribery laws have severe penalties and apply wherever we do business.
- Never ask for or accept a bribe.
- Use care and follow our policies and procedures on retaining third-party business associates, and properly supervise their activities.
- Never ask anyone else to do something that the law or our policies prohibit you from doing.
- Make sure that all payments, benefits or favors are fully, honestly and accurately reflected in the company's books and records. Never attempt to conceal or misrepresent a payment or an expenditure.
- Contact AEP Legal for guidance if you have any questions or concerns about bribery laws, our policies, or whether a gift or payment would be unlawful or inappropriate.





3.4 GIFTS & ENTERTAINMENT

Offers of gifts and entertainment between AEP employees and its customers, suppliers, and other business partners may be an acceptable part of doing business and a way to build goodwill. Providing or accepting occasional meals, seasonal gifts, and tickets to sporting events may be appropriate in certain circumstances. However, if offers of gifts or entertainment are frequent or of substantial value, they may create an actual or perceived conflict of interest.

Employees must exercise good judgment in accepting or providing gifts or entertainment. Talk to your manager or Ethics & Compliance when in doubt about whether to accept or provide a gift.

Gifts not meeting the outlined criteria must be returned to the donor, along with an explanation. If perishable, the gift should be donated to a charitable organization and the donor notified.

AEP recognizes that, under certain circumstances, providing or accepting invitations to functions that involve travel or overnight stays could be in AEP's best interest and contribute to good working relationships with customers or vendors.

- To the extent practical, AEP will pay travel expenses for you to participate in vendor-sponsored trips and activities;
- Your supervisor must approve your attendance at these functions.



REQUIRED CRITERIA TO ACCEPT

- It is consistent with good business practices;
- It cannot be construed as a business inducement;
- You are able to reciprocate;
- It would not be embarrassing to AEP if it were disclosed to the public;
- It adheres to your specific business unit policy.





CONSIDER THIS

As a rule, an occasional gift of a promotional item or an item with a nominal value is generally allowed.

AEP prohibits offering or accepting any gift or entertainment that may be deemed:

- Entertainment, hospitality or travel that has no clear business purpose or a gift or entertainment that is beyond reasonable business needs;
- Personal services, favors or loans;
- Payments or benefits to or services for an individual's family members;
- Offered as a "quid pro quo" (offered for something in return);
- Lavish or extravagant;
- Likely to reflect negatively on our reputation;
- In violation of applicable law or the policies of the giver or the recipient.

Be mindful, each business unit could have their own limit for accepting gifts and entertainment.

Q: The SME has been invited on a private plane to look at a manufacturing project with a vendor?

A: Consult with Ethics & Compliance as there may be multiple factors to consider in a situation like this.

Q: A vendor offers to provide lunch for all employees and contractors after safe completion of a project?

A: In most cases this would be acceptable with managerial approval. If you have questions please call Ethics & Compliance.





3.5 TRAVEL

Statement Purpose

[AEP Travel Policy](#) provides employees (authorized to travel on the company's behalf) with reasonable transportation, lodging, meals and other services necessary to conduct official business. This policy applies only to travel expenses. The Company's policy is also to reimburse employees for all reasonable expenses they incur on business in a timely manner.

Because not every situation encountered while traveling on business can be anticipated, each employee shall exercise good judgment and fiscal responsibility when doing business for the Company.

Whenever possible, employees should obtain prior management approval for any expenditures not specifically covered in this policy. Exceptions to this policy require prior approval from the employee's immediate supervisor. It is the responsibility of all managers to ensure that employees who travel are aware of and adhere to this policy.

For the intent of this policy, the reference to employee includes both employees and contractors directed to travel on company business.

Contact Information

Any questions regarding business travel should be referred to [Workplace Services](#) (200-6840 or 614-716-6840).

Employees remain representatives of AEP while traveling, including after work hours. All AEP's expectations of appropriate conduct should be followed.



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3.6 FERC STANDARDS OF CONDUCT & AFFILIATE RESTRICTIONS

The Federal Energy Regulatory Commission (FERC) Affiliate Restrictions prohibit the passing of nonpublic market information AEP's franchised public utilities with captive customers (i.e., AEP's operating companies) to AEP's market-regulated power sales affiliates (i.e., AEP's competitive affiliates), and requires those businesses to operate separately. The FERC Standards of Conduct prohibits the passing of non-public transmission function information to marketing function employees (including both competitive and operating company marketing function employees), and requires them to function independently of transmission function employees. Shared service employees may not act as a conduit under either rule. AEP complies with the Affiliate Restrictions and Standards of Conduct regulations through the joint efforts of all transmission, energy marketing and shared employees.



FERC ENERGY REGULATORY COMMISSION

Steps we have taken include:

- Transmission and marketing function personnel are physically separated, and marketing function personnel do not have electronic or physical access to transmission facilities or non-public transmission function information;
- AEP's market-regulated power sales affiliate personnel are physically separated from the employees of its franchised public utilities with captive customers and have no electronic or physical access to their facilities or non-public market information.

TELL ME MORE

Some Service Corp. employees provide services to both AEP's operating Companies and competitive affiliates, and could come in contact with operating company market information. Similarly, some Service Corp. employees provide services to both transmission and marketing function employees, and may come into contact with transmission function information. That's OK, provided that market and transmission function information is not inappropriately passed to competitive affiliates or market function employees, respectively, under the "No Conduit Rule".

- "Transmission functions" means the planning, directing, organizing or carrying out of day-to-day transmission operations, including the granting and denying of transmission service requests.
- "Marketing functions" generally means the sale or resale in interstate commerce, or the submission of offers to sell in interstate commerce, of electric energy or capacity, demand response, virtual transactions, or financial or physical transmission rights.
- "Marketing function employees" and "transmission function employees" means the employees and their agents who actively and personally engage on a day-to-day basis in each of those functions.
- "Market regulated power sales affiliates" means the competitive affiliates of a franchised public utility with captive customers (i.e., wholesale or retail electric energy customers served by a franchised public utility under cost based regulation) who makes sales of power for resale at market rates.





3.7 SUPPLIER DIVERSITY

AEP values competitive access in our supply chain as we strive to engage our customers as our business partners. We will achieve these goals by:

- Generating strategic partnerships with qualified and certified firms owned by minorities, women, LGBT, veterans and service-disabled veterans as well as HUBZone and Disadvantaged Businesses;
- Strategically sourcing goods and services that meet AEP's specifications without compromising performance expectations;
- Promoting strategic communications with minority and women's trade groups for developing and expanding small business capacity.



TELL ME MORE

Who are diverse suppliers?

- Women-owned businesses.*
- Minority-owned businesses.*
- Hispanic, African American, Asian, and Native American-owned businesses.*
- Veteran and Service disabled veteran-owned businesses.*
- LGBT-owned businesses.
- Historically Underutilized Businesses (HUBZone).
- Disadvantaged Businesses.

* Diversity status is determined by ownership percentage and revenue for the market.



3.8 ANTITRUST

Antitrust laws are designed to promote a vibrant free market. All employees are responsible for ensuring that our business is conducted in compliance with state and federal antitrust laws.

Q:

I am attending a utility group seminar. Is it OK to discuss our safety culture and our strategy for expanding into new markets?

A:

It is great to share safety practices so we can all improve the safety of our workplace; however, sharing specific information regarding product and geographic strategy may violate antitrust laws. Any publicly shared information regarding AEP's corporate strategy may be generally discussed. Check with [AEP Legal](#) with any questions.



TELL ME MORE

Never make agreements, exchange information or discuss the following topics with a competitor:

- Price, including any component of price (such as current or proposed fees, surcharges or discounts), for sales or purchases;
- Terms and conditions of sale or purchase;
- Cost;
- Profit margins;
- Employment practices;
- Sales or marketing plans;
- Bidding plans, including the amount of a bid, who should win or lose bidding, or who will or will not bid;
- Destroying another competitor (such as through below-cost pricing);
- Boycotting or otherwise refusing to do business with any third party, such as a customer, a supplier or another competitor.

Never use a customer or any other person as an intermediary to exchange company-sensitive information with competitors. Contact AEP Legal if you suspect a customer or other person is providing a competitor with AEP's sensitive information.



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OUR ASSETS

- 4.1 Financial Records, Reporting & Internal Controls (Intercompany Relations & SEC Reporting)
- 4.2 Insider Information & Trading Activities
- 4.3 Appropriate use of Company Assets & Records
- 4.4 Fraud



4.1 FINANCIAL RECORDS, REPORTING & INTERNAL CONTROLS

(Intercompany Transactions & SEC Reporting)

There is both internal and external interest in AEP's operations. Many rely on the timeliness, accuracy and integrity of our financial information to make important transactions or financial decisions. External parties that rely on our financial information include regulatory commissions, debt and equity investors, insurance carriers, environmental agencies and vendors.

We all share responsibility for detecting and preventing fraud and other inappropriate conduct. [AEP Speak Up Policy](#) requires you to immediately report any suspected fraud to an appropriate member of management, Audit Services, Ethics & Compliance, AEP Legal or Human Resources. Suspected fraud can also be reported confidentially and anonymously through the [AEP Concerns Line](#) at 1-800-750-5001.

Intercompany Transactions

The company's regulated subsidiaries are governed by laws and regulatory rules that regulate transactions between and among them. These laws and rules are intended to prevent cross-subsidies and to avoid the misstatement of expenses and earnings. The [AEP Accounting Department](#) or [AEP Legal](#) should be contacted for assistance with these laws and rules.

SEC Reporting

All AEP employees participating in the preparation of reports or documents filed with or submitted to the Securities and Exchange Commission (SEC) or engaging in public communications made on behalf of AEP shall endeavor to ensure full, fair, accurate, timely and understandable disclosures.



Accurate Record Keeping

- Be sure that the information you prepare, process and analyze:
 - is accurate;
 - is thorough;
 - complies with applicable laws, accounting principles and company policies.
- Never falsify, try to hide or mischaracterize an AEP record.
- Never attempt to bypass any company procedure or control, even if you think it would be harmless or save time.
- Always cooperate with external and internal auditors and investigators.
- Be familiar with and follow company policies and procedures regarding business records, including requirements to keep and delete or discard business records ([see section 5.7](#)).
- Never destroy records to avoid disclosure in legal proceedings or investigations, and comply with any notice from [AEP Legal](#) that requires you to retain records.

AEP Concerns Line
1.800.750.5001



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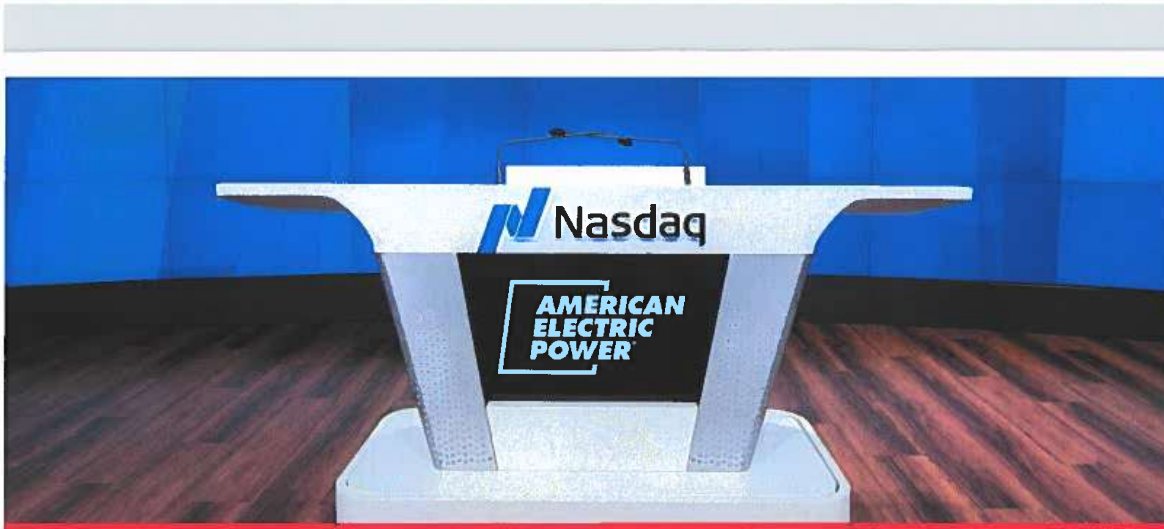
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4.2 INSIDER INFORMATION & TRADING ACTIVITIES

AEP stock is registered with the Securities and Exchange Commission, which allows the securities to be traded publicly. This right imposes an obligation on the company to support the integrity of the market.

Insider trading is the trading of company stock based on insider information and is strictly prohibited. Insider information includes material non-public information that an employee, or an agent, vendor, contractor or consultant, learns through his or her employment.

An employee cannot buy or sell any company stock based upon material non-public AEP information until after the public has received the information and the stock market has time to react to it.

Employees must not disclose insider information to others, including family, friends and acquaintances.

Persons who trade AEP stock based on insider information may subject themselves, and/or the employee who provided that information, to criminal and/or civil action, regardless of whether the employee benefits from the transaction. All employees should refer to the [AEP Insider Trading Policy](#) for more information.

Q:

Due to my job responsibilities, I often have access to earnings information before it is released. If someone asks me how the numbers look before the SEC filing, is it OK to provide them a general indication of the earnings?

A:

No, any type of disclosure of material non-public information including estimates or other types of tipoffs is prohibited. Material non-public information should be discussed only among employees who have a need to know in order to complete their job responsibilities and who understand the insider trading rules.



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Q:

My family and friends sometimes ask me how AEP is doing and if they should buy our stock. I feel the company is doing well, and I am proud to work for AEP, so I recommend that they buy it, is this a problem?

A:

It is great to be proud of our accomplishments. To avoid any potential problems, it would be best to refer them to the Investors tab on [AEP.com](https://www.aep.com), where there are presentations and other investor-related materials for their review.



TELL ME MORE

Examples of what could be considered material non-public information include:

- Judicial or regulatory decisions;
- Dividend declarations;
- Plans to issue or buyback securities;
- Earnings announcements;
- Pending acquisitions or mergers;
- Joint venture and contract negotiations.

What's In Bounds

- Protecting company inside information from those who do not have a need to know;
- Adhering to SEC regulations and company policy for buying or selling AEP stock.

What's Out of Bounds

- Discussing inside information in public places;
- Using or sharing inside information for personal gain;
- Trading in the securities of AEP when you have material non-public information that has not yet been released to the public.



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4.3 APPROPRIATE USE OF COMPANY ASSETS & RECORDS

AEP has entrusted you with the tools and resources you need to perform your job.

Limited personal use of certain company-owned assets is permissible. For example:

- You may make occasional personal phone calls;
- Using the internet to check the current news, provided that use is neither excessive or interferes with your job;
- Using the company vehicle to pick up lunch while heading to the job site.

Employees should neither perform, nor be directed to perform, personal work while on company time.

Examples include:

- Doing personal grocery shopping while picking up company mail;
- Directing a subordinate to pick up your personal vehicle from the repair shop;
- Picking up a payment from your rental property.

You should never use company-owned assets for outside personal business purposes.

Occasionally, you may be asked to perform work on behalf of AEP as part of a public service or charitable function. This may involve using company tools, equipment, vehicles or time. Examples may include:

- Installing lights at a Little League baseball field.
- Using your company computer to present a slideshow at a United Way meeting.

Please be sure to fully disclose this activity and obtain prior approval from your manager.





TELL ME MORE

It is inappropriate to use company assets, supplies or to perform the following on company time;

- Tax preparation, for others or for profit;
- Real estate business transactions either as a landlord or as an agent;
- Sending or receiving communication (email, phone, text) related to a personal business;
- Using company contact information (email, phone, address) for a personal business.

You may never use AEP's assets or the AEP network to view, send, store or print pornographic or other offensive material.

- This policy covers pornographic or other offensive materials containing racial, ethnic, religious or sexist slurs, memes, jokes or epithets;
- Any employee found to have violated this policy will be subject to disciplinary action, up to and including termination on the first offense;
- AEP monitors activity on company-owned assets and across AEP's networks; including but not limited to:
 - emails;
 - text messages;
 - cellphone usage;
 - visits to websites;
 - downloaded apps;
 - any personal device connected to AEP's network.

For more information or questions, please review [AEP Prohibition Against Pornography and Offensive Material Policy](#).



DID YOU KNOW

Forwarding a racial or sexist joke on AEP email or messaging systems is a violation of the AEP Prohibition Against Pornography and Offensive Material Policy?



4.4 FRAUD

Fraud is the false representation or concealment of a material fact with the intent of personal gain and/or improving the company's image or standing.

Fraud also includes intentionally preparing or submitting financial statements that could make the company look better, even if there is no direct benefit to the employee.

Examples of fraudulent actions:

- Forgery or alteration of any document or account belonging to the company;
- Forgery or alteration of a check, bank draft or any other financial document;
- False representation of facts to allow misappropriation of funds, securities, supplies or other assets;
- Impropriety in the handling or reporting of money or financial transactions;
- Profiting from insider knowledge or company activities;
- Intentionally disclosing confidential and proprietary information or falsifying information to outside parties;
- Misrepresentation or falsification of accounting records or journal entries that mislead the users of the financial statements.



DID YOU KNOW

Some common examples of fraud include:

- Misrepresentation of health insurance data;
- Misuse of corporate credit/fuel cards;
- Theft or unauthorized use of company-wide assets, including office supplies and tools;
- Falsification of time sheets, which includes misrepresentation of overtime or sick time.

Any employee who is witness to suspected fraud is responsible for immediately reporting it to an appropriate member of management, Audit Services, Human Resources or Ethics & Compliance.





INFORMATION TECHNOLOGY & SECURITY

- 5.1 Digital Identity & Physical Security
- 5.2 Confidential Information & Privacy
- 5.3 Cybersecurity Intelligence & Defense
- 5.4 Phishing
- 5.5 Critical Infrastructure
- 5.6 Intellectual Property
- 5.7 Enterprise Content Management
- 5.8 Enterprise Policy Development & Maintenance





5.1 DIGITAL IDENTITY & PHYSICAL SECURITY

Digital Identity and Physical Security organization administers the region security officer force and is responsible for the physical security of AEP employees and assets. Digital Identity and Physical Security manages the Identity and Access Management (IAM) Program, including identity registration and provisioning, installs and maintains the corporate physical access control system, which includes AEP's building card/ID badges, e-keys, security cameras, and detection systems. The Digital Identity and Physical Security team also provides employee safety programs and training, such as Workplace Aggression training, Customer Threat Training for field personnel, and Armed Aggressor Response training.

Mandatory Self-Reporting

AEP requires that within 24 hours of an event, employees will report to their immediate supervisor and/or their local Human Resources representative the following:

- An arrest, charge, indictment or conviction of a felony or misdemeanor criminal charge (except minor traffic offenses that will not result in incarceration);
- Service of a protection order or restraining order when the employee is listed as the subject of the protection or restraining order.

**REPORT SECURITY INCIDENTS TO AEP
SECURITY EITHER ONLINE OR BY CALLING**

Security Hotline
1.866.747.5845

**7 days
a week**

Audinet
8.200.1337

Available 24 hours



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5.2 CONFIDENTIAL INFORMATION AND PRIVACY

Confidential Information

AEP values security and data privacy. Employees are AEP's most important tool to assure data security. All employees with access to AEP funds, property or information have a responsibility to manage them with the highest level of integrity and to avoid any misuse of these assets. Every precaution should be taken to prevent passing information to unauthorized persons, both inside or outside of AEP, particularly in those areas where confidential information and technologies play a major role in business strategy.

Privacy

AEP recognizes the importance of having effective and meaningful privacy protections in place. Privacy at AEP extends beyond protection of "traditional" personally identifying information, such as name, social security number, or driver's license number. In certain situations, AEP must also protect other types of information that can be linked to an identifiable individual. AEP complies with all privacy and security laws relevant to its business operations. AEP only uses personal information to fulfill legitimate business purposes and does not collect, use, or disclose personal information for purposes beyond what are adequate, relevant, and reasonably necessary in relation to that business purpose. Employee's at AEP are critical to maintaining the integrity of AEP's privacy program and their specific obligations in relation to personally identifying information are laid out in detail in the [Personally Identifiable Information Protection and Use Policy](#).



TELL ME MORE

What is considered confidential information?

- Engineering and other technical data.
- Financial data, including actual and projected earnings and sales figures.
- Planned new services and products.
- Advertising and marketing programs.
- Actual and proposed business plans and strategies.
- Customer and supplier lists and information, including contract provisions and pricing.
- Capital investment plans.
- Product configuration, component specifications, logic diagrams and technical drawings.
- Test data.
- Trade secrets, including methods, programs and processes.
- Employee information, including personal information and organizational charts.



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WHAT TO DO

- Know and comply with all applicable privacy and data protection laws, policies and procedures that apply to your job.
- Respect and maintain the confidentiality and security of personal information collected by or for the company at all times.
- Never collect or attempt to access personal information about employees, customers or business partners that you do not need to do your job, and never keep such information longer than it is needed.

Q: I am changing positions from a regulated to a non-regulated position. I would like to keep access to some files for reference, is there an issue with that?

A: Any of the files you would like to keep will need to be reviewed for business purposes, reach out to [AEP Legal](#) for guidance.



TELL ME MORE

What is PII?

An individual's first name or initial with the last name, plus any one of the following:

- Social Security number;
- Driver's license number;
- State or federal government issued ID number;
- Passport number;
- Biometric data (including but not limited to fingerprint, DNA, voiceprint or retinal scan);
- Personal credit card number;

- Bank account or debit card number, along with any required security information or password required for access.

What is not PII?

- Customer account numbers;
- Corporate credit card information;
- Another corporation's bank account number;
- Birth date;
- Employee number;
- Last four digits of a Social Security Number.



5.3 CYBERSECURITY INTELLIGENCE & DEFENSE

Cybersecurity Intelligence and Defense has responsibility for monitoring, managing, mitigating, investigating, responding, and reporting cybersecurity risks, cyber threats, insider threats, and cyberattacks against the AEP enterprise. The Cybersecurity Intelligence and Defense team protects AEP's endpoints, users, and systems, both on premise and in the cloud from a wide array of cyber threats. These cyber threat protections are accomplished by performing functions including security data analytics; insider threat detection and response; analyzing threat intelligence; proactively hunting for threats; collaborating with industry peers and U.S. Government partners on threat intelligence topics; managing enterprise security technologies; administering multi-factor authentication technologies; and performing forensics and electronic discovery in support of Human Resources, Ethics & Compliance and AEP Legal investigations.

The Cybersecurity Intelligence and Defense team is home to the AEP Insider Protection and Prevention Program (IP3) and the 24x7x365 Cybersecurity Desk who are responsible for leading all cybersecurity or insider threat incident response activities for AEP.



5.4 PHISHING

How to recognize and avoid phishing:

1. Consider all external emails containing attachments or links as potential risks.
2. External emails will always contain the word "External" in the subject line. A brightly colored banner is also added to the top of the content area of most external emails.
3. DO NOT open attachments or click on links from untrusted or questionable sources.
4. If an email is suspicious, click the Report to Incidents button in your Outlook Ribbon to forward the email to incidents@aep.com for review.
5. The Report to Incidents button is not yet available for mobile device users, and any suspicious emails should be forwarded to incidents@aep.com.

Three Primary Phishing Threats

1. Malicious links
 - direct you to imposter websites that steal your information and infect your device with malware;
2. Malicious attachments
 - compromise your computer;
3. Request for sensitive data
 - prompt you to fill in user IDs, passwords, financial information, etc, which is then stolen.



SERIES OF ESCALATION

In an effort to protect AEP from malicious cyber threats, AEP will require all staff (both employees and contractors) to participate in an ongoing Phishing Awareness program. All employees should review the [Email Phishing Accountability Policy](#).

Staff that "fail" a Phishing Awareness email test by clicking on embedded links, opening included attachments and/or forwarding the test email outside of AEP will be subject to a series of training and manager intervention steps (subject to existing labor contracts).

READ & THINK BEFORE YOU CLICK

Watch for:

- Misspellings and poor grammar.
- Messages that don't seem quite right.
- Unsolicited emails.

Ask Yourself:

- Was I expecting this message?
- Does this email make sense?
- Am I being pushed to act quickly?
- Does this seem too good to be true?
- What if this is a phishing email?



5.5 CRITICAL INFRASTRUCTURE PROTECTIONS

You have a role to play to ensure the security of your co-workers and AEP's assets. The role can vary from keeping your computer password secure to reporting suspicious persons on or around AEP property. That role has grown to include being cautious about how you post both personal and company-related information on social media.

AEP is subject to the North American Electric Reliability (NERC) Standards. The standards include extensive requirements for securing utility infrastructure and implementing specific information management policies.

Government regulations require AEP to report any sabotage events. Because sabotage is difficult to determine, all employees and contractors should report any suspicious events to Security. The Physical and Cybersecurity teams will investigate to determine if sabotage has occurred.

For additional information or questions, visit online at [Security](#) or [NERC Reliability Standards](#).



DO YOUR PART

- Keep personal and AEP items properly secured, and lock your desk when unattended.
- When traveling, secure laptops and other valuables in an area of your vehicle that is not visible.
- Always lock unattended vehicles.
- Always password-lock your computer when away from your desk.



DID YOU KNOW

If you work in or have access to a NERC CIP-designated location, you are required to comply with these stringent security standards:

- Enter a NERC CIP-restricted area only if you are certain that you have approved unescorted access;
- If you enter with an escort, you must log in and out every time you enter or leave that location;
- If you are escorting an individual into a NERC CIP restricted area, know your responsibilities;
- When in doubt, call the Security Hotline at 1-866-747-5845 (Audinet 8-200-1337).



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5.6 INTELLECTUAL PROPERTY

You must safeguard AEP's confidential and proprietary information, trade secrets and other intellectual property, which includes copyrights, trademarks and patents.

Employees must not disclose any information that might compromise proprietary technologies or trade secrets to any unauthorized persons. You also must take reasonable precaution against inadvertently disclosing this information to anyone not authorized to have it.

Just as we expect our intellectual property rights to be protected, we will respect the intellectual property rights of others. You may not intercept, duplicate or gain the intellectual property of others through any means, unless given permission by the intellectual property right holder. Additionally, confidential information provided from outside sources may not be shared until approved by [AEP Legal](#).



DID YOU KNOW

AEP has ownership rights to the inventions, knowledge and employee work product—collectively known as intellectual property—developed in the course of employees' work, on company time and using AEP assets and facilities. AEP will establish and protect its right to such intellectual property.



5.7 CONTENT GOVERNANCE

Laws, regulations and AEP policies dictate which records must be retained, how they are managed and how long they must be kept. A consistent approach to content governance helps us mitigate risk.

[AEP Retention Schedule](#) outlines how records are to be classified and handled according to the [AEP Security Data Classification Guidelines](#).

In addition, some records may be subject to a legal hold. These may include requests from a government agency, private individual, or corporation as part of a legal proceeding, or the request may be for records that are relevant to pending or anticipated litigation. AEP Legal will advise you on the need to preserve documents and records. A legal hold supersedes any retention requirement specified in our record retention policies. If you have questions regarding the disposition of a particular document, please contact [AEP Legal](#).



DID YOU KNOW

Upon ending your employment at AEP, whether through retirement, resignation, or termination, please remember the following:

- Mass data transfers and removable disk transfers are monitored by IT Security;
- DO NOT use an unauthorized removable disk or any similar item to download your workstation or server contents;
- If you have personal information on your workstation such as photos or documents, contact Ethics & Compliance prior to removal to get authorization.



TELL ME MORE

What is a Legal Hold?

A Legal hold is a notification from an organization's legal team to employees instructing them to preserve electronically stored information, hard copy documents, or any evidence that may be relevant to a pending or anticipated legal dispute or lawsuit.

What kind of information do I need to preserve if I'm on a Legal hold?

- Company devices (cell phones, laptops, etc.)
- Physical evidence (broken pole, tampered meter, other tangible items)
- Hard Copy Files
- Personal Devices with relevant information (cellphones computers, tablets, thumb drives)





5.8 ENTERPRISE POLICY DEVELOPMENT AND MAINTENANCE

Policies are the guiding principles or courses of action adopted by the organization to establish general rules or widely shared values for achieving Company goals and objectives. A policy is considered an "Enterprise Policy" if it is intended to govern the activities of any employee or contractor not in the direct reporting structure of the Policy Owner.

All enterprise policies must be reviewed by the chief compliance officer who will route to an executive review team for review and approval. All enterprise policies should be linked on [Policy Central](#) where you can also find the [Policy Template](#).

After approval, each policy must be reviewed annually by the policy owner.

All enterprise policies must include:

- The title of the policy;
- The name and title of the Policy Owner;
- How to report an incident;
- Consequences;
- The date of the last revision or review of the policy.

For assistance with an enterprise policy contact Ethics & Compliance.





OUR IMAGE

- 6.1 [Communications & Marketing](#)
- 6.2 [Social Media](#)
- 6.3 [Political Participation](#)
- 6.4 [Sustainability](#)





6.1 COMMUNICATIONS & MARKETING

AEP is frequently the subject of print and electronic media coverage. AEP Communications & Marketing staff assists reporters from regional, national and international publications as they work on stories about issues and developments that are of importance to the company.

Contact [Communications & Marketing](#) for assistance on media issues.



DID YOU KNOW

- If you receive a request from the news media to do an interview or respond to an issue on behalf of the company, please refer the request to Communications & Marketing;
- In situations where an immediate comment is required in the interest of public safety, AEP employees should feel free to comment to the extent necessary on matters within their areas of expertise. In such cases, they should inform Communications & Marketing of their media contact as soon as possible.

If you have questions contact Media Relations, send an email to mediarelations@aep.com



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6.2 SOCIAL MEDIA

This policy covers the communications of all AEP employees and contractors, on all social media, during work and non-working hours, on Company-issued and personal cellular and computing equipment.

AEP recognizes the importance of social media to inform and shape thinking about the Company, its brands, products and services, and Company-sponsored events. AEP also recognizes that social media is a communication tool frequently utilized by employees.

All employees are expected to review and understand the [Social Media Policy](#).

If you wouldn't say it to your supervisor or CEO face-to-face, you probably shouldn't say it on social media.

Treat others with respect.

Treat past and present co-workers, supervisors, suppliers, customers, AEP and yourself with respect. Do not post material or comments about AEP employees, vendors, suppliers or customers that are offensive, demeaning, inappropriate, obscene, pornographic, bullying, harassing, discriminatory, threatening, violent or abusive.

Be Aware: Private things are not private.

Many times things that you publish can be seen or found by others, despite privacy settings. Consider everything you post online as potentially viewable by anyone.

Be Authentic: Make it clear that the views expressed are yours.

Remember, nothing damages an individual's online reputation more than misrepresentation. Also, make sure your profiles are consistent with how you present yourself to your co-workers, clients and customers.

Only approved spokespersons can speak on behalf of AEP.

Do not portray yourself as a spokesperson or even an unofficial spokesperson on issues relating to the Company.



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Only individuals who have been granted specific permission to comment on and/or otherwise contribute to social media for business purposes are "Authorized Digital Spokespersons".

Contact: Melissa McHenry at mamchenry@aep.com or 614/716-1120 if you think an official AEP response may be required for something you see on social media.

Be Careful: What you share and how you share it.

Refrain from using comments that are demeaning, inflammatory or offensive. If you make a mistake, be the first person to correct it.

Respect confidentiality.

It is good business practice for companies and individuals to keep certain topics confidential. NEVER disclose any of AEP's confidential and undisclosed business information, personal employee information or the confidential and undisclosed business information of suppliers and others with whom AEP does business.

Respect copyrights and fair use.

Always make sure to give proper credit where it is due and be sure you have the right to use a piece of information before you publish it.



- Remember that you are responsible for the content you publish on any medium;
- Refrain from using comments that are demeaning, inflammatory or offensive;
- Consider your audience before you post something;
- Respect copyrights and fair use;
- Make sure your profiles are consistent with how you present yourself to your, co-workers and customers;
- Never discuss, in social media, the employment status of a fellow employee or contractor, customer accounts, or contracts with AEP vendors.



Any page or other social media presence intended to officially represent AEP (or any of its subsidiaries, projects or programs) must be approved by the Social Media Manager.

Individuals who have been granted specific permission to comment on and/or otherwise contribute to social media on behalf of AEP for business purposes are Authorized Digital Spokespersons.

If you are not an Authorized Digital Spokesperson, you may not comment or make statements on behalf of AEP on social media.





6.3 POLITICAL ENGAGEMENT

Our industry is undergoing fundamental transformation driven by a number of factors, including new public policies.

To meet our customers' evolving expectations, we sometimes must work to reshape the regulatory and legislative framework in which we exist. To do this, AEP is active in the policy making and political process through routine, constructive engagement with government officials, policymakers and stakeholder groups.

AEP exceeds the basic legal requirements to maintain transparency in its interactions with policymakers and political or advocacy organizations.

- For the benefit of all stakeholders, AEP actively participates in the political process and in lobbying activities at the national, state and local levels, where allowed to by law.
- Where permitted by law, AEP may contribute corporate funds to state and local candidates, parties, committees, ballot measures and political organizations that are generally supportive of our business interests and aligned with our core values.
- No contribution will be given in anticipation of, in recognition of, or in return for any official act, and all corporate political contributions are disclosed.

Use of Corporate Resources

In order to guard against any inadvertent in-kind Corporate Political Contributions, the use of corporate resources in connection with Political Activities, such as fundraising and campaigning, in those jurisdictions that allow such in-kind contributions, shall be reviewed and approved under the [Political Engagement Policy](#). Any events that are Political Activities and that use corporate resources must be precleared by AEP Legal before the event is planned. Please note if a non-AEP entity, including any AEP PAC, utilizes any AEP space for a Political Activity event, it must pay AEP in advance for the space and any services (including food service) and goods to be provided.



Disclosure

AEP is committed to transparency in its Political Activities. The company discloses its Corporate Political Contributions in accordance with applicable laws and regulations. In addition, AEP voluntarily discloses activities subject to this policy through our website and our Corporate Sustainability Report, to provide customers, stakeholders, and shareholders additional information about our participation in the political process on an annual basis.

Oversight

Every Corporate Political Contribution must be approved by AEP Legal and AEP Executive Management.

Compliance

AEP has established strict internal policies, processes and compliance measures to ensure adherence to legal and regulatory requirements.

Political Participation

You are encouraged to participate in political civic duties as long as you are able to meet the responsibilities of your job at AEP and no conflicts of interest exist. We support our employees' rights to support political causes and candidates, as long as it is done in a lawful, peaceful and respectful manner.

Employee Officeholders

Employees seeking political office, either by appointment or election, must be sensitive to potential conflicts of interest and must disclose the position in the annual conflict of interest disclosure. The political office must not interfere with your ability to do your job at AEP. The employee officeholder should make it clear that his or her opinions are their own and not those of the company unless the employee is serving on an appointed or elected Board as an official representative of AEP. AEP expects employee officeholders to act in the public interest – whether or not those decisions affect AEP.

Political Attire

AEP is committed to an inclusive and diverse work environment, one that is free of harassment and discrimination. To support this effort we ask employees to refrain from workplace expressions including attire, signage or electronic messages, that could be viewed as campaigning for any individual candidate and/or political party.





TELL ME MORE

What is the definition of a Government Official under the Political Engagement Policy?

- Any official, officer, employee or representative of, or any person acting in an official capacity for or on behalf of, any governmental entity (including federal, state, local, or municipal government department or agency), whether elected, appointed, retained or otherwise employed, when that individual's role or position involves oversight of or influence over AEP's interests;
- Any company, business, enterprise or other entity owned, in whole or in part, or controlled by any person described above;
- Any political party or party official or candidate for political office.



WHAT WOULD YOU DO

Marsha has been working with a senior state commission member on a rate case. One day, the commission member tells Marsha that his daughter is graduating with a degree in engineering. He wonders – can Marsha help get his daughter's foot in the door at AEP after graduation?

Q: What should she do?

A: Marsha should thank the commission staff member for his interest on behalf of his daughter and AEP. She should encourage him to tell his daughter to check out the career section at [AEP.com](https://www.aep.com).



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WHAT WOULD YOU DO

The local school district has a levy on the ballot this November. The plant has always been a big supporter of the school in various ways and many of the plant employees have children in the district. The plant manager wants to contribute company money to the school levy.

Q: Can She?

A: A school levy is a "ballot issue" and so the contribution would be a Corporate Political Contribution; as such, it must have AEP Legal and management approval before it can be made.



DID YOU KNOW

AEP discloses contributions of corporate funds or in-kind services by AEP to Social Welfare Organizations in accordance with the Political Engagement Policy. These contributions must be approved by AEP Legal and executive management.

"Social Welfare Organization" means a social welfare organization operating under section 501(c)(4) of the Internal Revenue Code. Examples include:

- Human Rights Campaign
- Economic Development Corporations
- Rotary and Lions Club (and many other civic clubs)
- Volunteer Fire Departments
- AARP



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6.4 SUSTAINABILITY

At AEP, we are integrating sustainable business practices into our short- and long-term growth strategy to deliver clean, reliable and affordable energy to our customers, while positively impacting the environment and society.

We are guided by these key focus areas:

Clean & Just Energy Transition

We are committed to responsibly decarbonizing our operations by investing in cleaner energy options and modernization of the electric power grid. This includes putting strategies in place to support our employees through the transition and collaborating with our communities for a sustainable future.

Environmental Compliance & Stewardship

We are committed to complying with all applicable environmental regulations and being good stewards of natural resources. Our goal is zero violations of environmental laws and regulations and zero enforcement actions.

Social Justice & Equity

We are committed to considering the social impacts of our operations and decisions and putting mechanisms in place that provide equitable access to clean and modern energy options. This includes meaningful engagement with customers and communities to ensure fair treatment and equitable decision-making.



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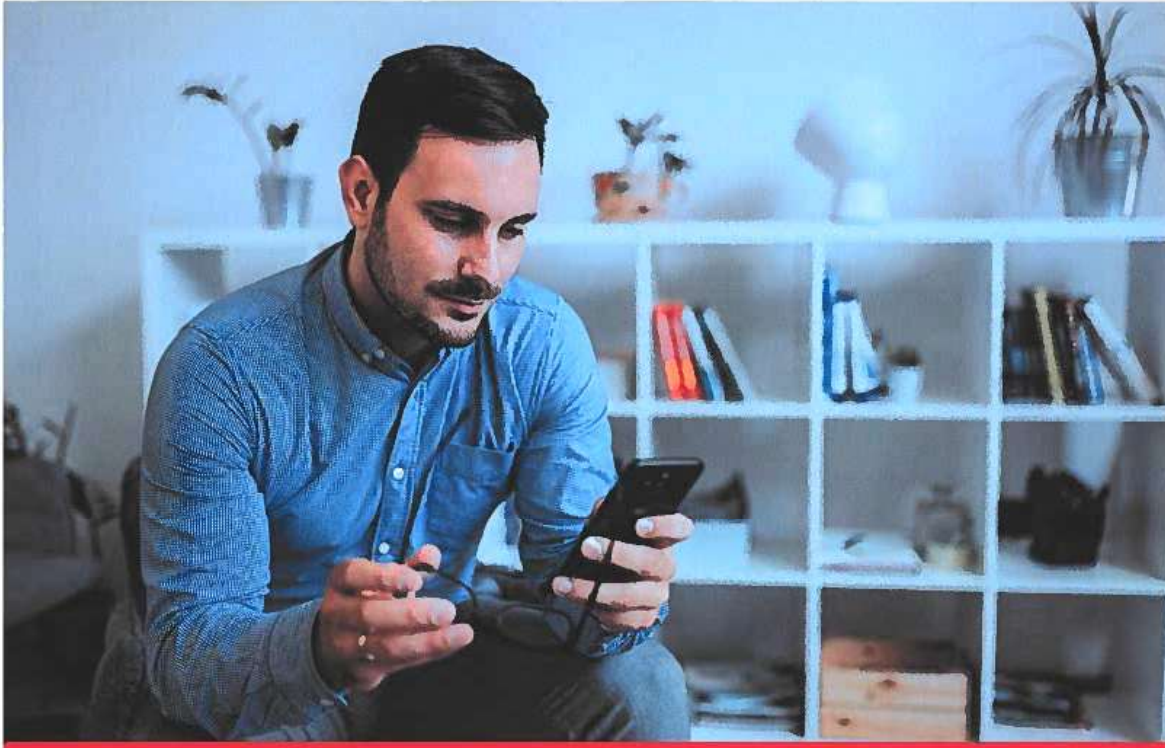
Governance & Oversight

We are committed to strong governance practices that protect the long-term interests of our stakeholders. Leadership and governance are foundational to building and strengthening sustained business value and ensuring transparency, fairness and accountability, while providing structure to ethically manage the challenges of a changing society.

WHAT TO DO

- Be a good corporate citizen and environmental steward;
- Be familiar with and follow the environmental regulations, policies and procedures that apply to your job;
- Dispose of waste materials legally and in a way that meets our environmental standards;
- Take appropriate action to quickly address instances of environmental spills or equipment upsets to minimize impact on the environment.





REPORTING CONCERNS

- 7.1 [Office of Ethics & Compliance](#)
- 7.2 [Should I Report?](#)
- 7.3 [How Do I Report?](#)
- 7.4 [How Does The Concerns Line Work?](#)
- 7.5 [Retaliation](#)





7.1 ETHICS & COMPLIANCE

Ethics & Compliance is committed to supporting AEP's strong culture and to raise awareness of the importance of ethics and compliance at AEP. The Ethics & Compliance department consist of the Chief Compliance officer and staff who support the ethics and compliance program at AEP. The ethics and compliance team promotes the ethics program and raises awareness of policies, procedures and expectations to support a Speak Up culture. The Ethics & Compliance Specialist conduct investigation, develop training and communicate regularly with employees. Our ethics and compliance program promotes a culture of high ethical standards and compliance with all laws and regulations

Ethics & Compliance regularly communicates with executive and board leadership and will recalibrate the program based on changing internal and external demands and emerging trends.



How is anonymity ensured in the Concerns Line Process?

- All calls to the AEP Concerns Line are answered by a third-party call center;
- The vendor does not track phone numbers or record conversations;
- All calls and contacts are logged into a secure database that can be accessed only by E&C staff;
- All reporters create a unique password to access his or her case in the future;
- It is the reporter's responsibility to log into the database to retrieve messages and requests from E&C.





7.2 SHOULD I REPORT?

Deciding whether to report a concern can be a difficult decision for anyone.

Suspected unlawful or criminal offenses like fraud, corruption, bribery, or blackmail

Abusive behavior, such as bullying, harassment, discrimination

Improper conduct or unethical behavior such as altering or suppressing quality or safety test results

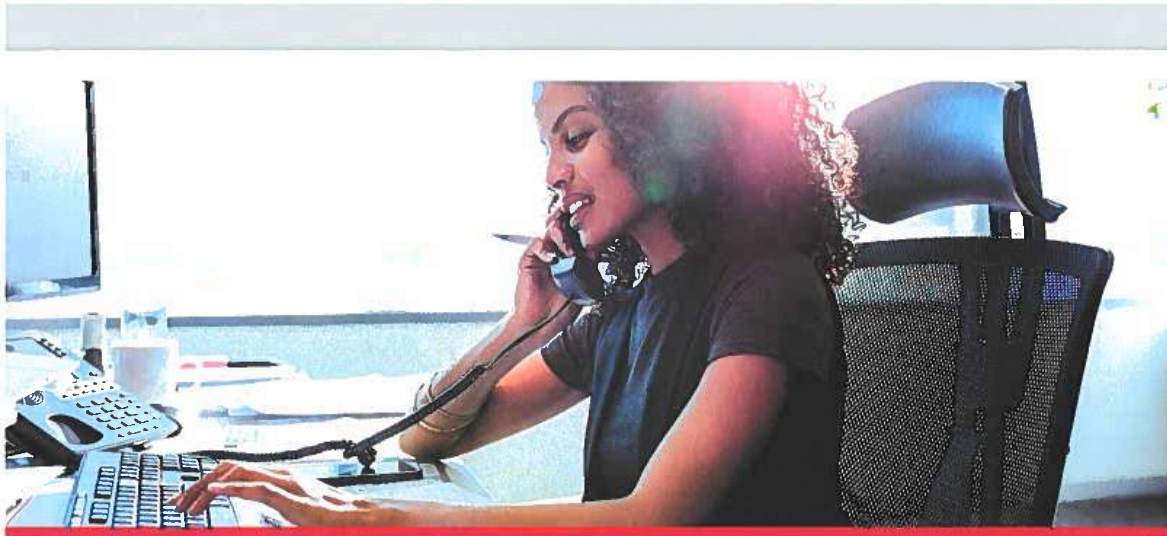
Failing to protect confidential information

Unauthorized use or theft of our organization's property and resources



Common Examples of Reportable Activities





7.3 HOW DO I REPORT?

- Call the Concerns Line toll free, 24 hours a day at 1-800-750-5001;
- Contact Ethics & Compliance Office:
 - 614-716-6226;
 - 1 Riverside Plaza, Columbus, OH 43215;
 - www.aepconcernsline.com;
- Report to management or Human Resources.



7.4 HOW DOES THE CONCERNS LINE WORK?

All calls to the AEP Concerns Line are answered by an independent, non-affiliated firm to ensure anonymity when desired by the reporter. The firm's representative documents the concern and may ask clarifying questions to ensure the concern is completely understood. The information is then transmitted to Ethics & Compliance, and an investigation is conducted. Every effort is made to protect the reputation of those involved. At the conclusion of every investigation, a response is provided to the reporter either directly or through the AEP Concerns Line website.

If you have questions or are seeking guidance on ethical issues and do not require anonymity, you can contact Ethics & Compliance directly at 614-716-6226 or Audinet 8-200-6226.



Concerns Line Process

Intake

- Concerns Line (1-800-750-5001)
- Direct Contact
- Internet (www.aepconcernsline.com)
- Letter/Email
- Referrals

Investigation

- Partner with Business Unit and others
- Gather background information
- Conduct interviews and/or culture assessments

Resolution

- Provide Manager/HR/BU with recommendation toward a resolution.
- Follow-up with the caller and discuss the outcome and answer any follow-up questions.
- Inform those who participated in the investigation the case has been closed and answer any follow-up questions.

7.5 RETALIATION

Employees, contractors, vendors and 3rd party suppliers who come forward with concerns play an important role in maintaining a healthy, respectful and productive workplace. Retaliation against an employee who reports an issue in good faith or raises a concern he or she believes to be true involving a violation of company policy, law or regulation is strictly prohibited.

Retaliation can take many forms, such as demotions, undesirable assignments, inappropriate performance ratings and termination of employment. Retaliation may also include verbal harassment, intimidation, threats of retaliation and any attempt to identify an anonymous AEP Concerns Line reporter. Be aware that retaliation can occur between management, employees, contractors, vendors and 3rd party suppliers as well as among employees themselves.

For more information on retaliation and harassment see the Speak Up policy.



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THERE ARE MANY CHANNELS FOR REPORTING ACTIVITIES AND CONCERNS



Concerns Line
1.800.750.5001



**Your Manager or a Manager
in another Department**



Human Resources
hr@aep.com
1-888-237-2363 option 5



Ethics & Compliance
614.716.6226



Anonymous Report
www.aepconcernsline.com

Office of the Chief Compliance Officer

Gina Mazzei Smith
614.716.2990
gemazzei-smith@aep.com

Contact the Ethics & Compliance staff directly

Donna Buckler
614.716.3550
dkbuckler@aep.com

Teresa McIntyre
614.716.2961
tcmcintyre@aep.com

Stephanie Caudill
614.716.2935
slcaudill@aep.com

Heather Fagadar
614.716.3868
hjfagadar@aep.com

Terry Waggener
614.716.1690
tlwaggener@aep.com



AEP Concerns Line:
1.800.750.5001

www.aepconcernsline.com



Kentucky Power Company
KPSC Case No. 2024-00144
Commission Staff's First Set of Data Requests
Dated August 2, 2024

DATA REQUEST

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

RESPONSE

a. Firm power purchases: N/A.

b. Firm Power sales: Commitments for Kentucky Power Company, other than retail jurisdictional customers, are the Cities of Olive Hill and Vanceburg Kentucky, as shown below. The numbers listed below represent the customer's actual peak load for the period May 2023 through October 2023. The cities use the power for load-following service to their citizens.

	May 2023 - October 2023
City of Olive Hill	4.4 MW
City of Vanceburg	9.7 MW

Witness: Lerah M. Kahn

Kentucky Power Company
KPSC Case No. 2024-00144
Commission Staff's First Set of Data Requests
Dated August 2, 2024

DATA REQUEST

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

RESPONSE

Please see KPCO_R_KPSC_1_13_Attachment1 for the requested information.

Witness: Lerah M. Kahn

Kentucky Power Company
KPSC Case No. 2024-00144
Commission Staff's First Set of Data Requests
Dated August 2, 2024

DATA REQUEST

- KPSC 1_14** Describe the effect on the FAC calculation of line losses related to:
- a. Intersystem sales when using a third-party transmission system; and
 - b. Intersystem sales when not using a third-party transmission system.

RESPONSE

a. Beginning on June 1, 2007, based on FERC Order EL06-055, PJM modified the Locational Marginal Pricing (LMP) approach to calculate transmission line loss costs on a marginal basis. The new LMP calculation reflects the full marginal cost of serving an increment of load at each bus from each resource associated with an eligible energy offer. The LMP price will be the sum of three separate components: System Energy Price, Congestion Price, and Loss Price. Therefore, each spot market energy customer pays an energy price that includes the full marginal cost of energy for delivering an increment of energy to the purchaser's location. Market buyers are assessed for their incremental impact on transmission line losses resulting from total load scheduled to be served from the PJM Spot Energy Market in the day-ahead energy market at the same day-ahead loss price applicable at the relevant load bus.

Market sellers are assessed for their incremental impact on transmission line losses resulting from energy scheduled for delivery in the day-ahead market at the day-ahead loss prices applicable to the relevant resource bus.

Transactions are balanced in the real-time market using the same calculation, but are based on deviation at each bus from the day-ahead using the real time loss price.

b. Kentucky Power conducts intersystem sales through its participation in the PJM wholesale markets. Please refer to part (a) for a description of the effect of losses on intersystem sales on the FAC calculation.

Witness: Lerah M. Kahn

Kentucky Power Company
KPSC Case No. 2024-00144
Commission Staff's First Set of Data Requests
Dated August 2, 2024

DATA REQUEST

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

RESPONSE

Please see KPCO_R_KPSC_1_15_Attachment1 for the requested information.

Witness: Paul J. Massie

Kentucky Power Company
Fuel Adjustment Case No. 2024-00144
Generating Unit Outages
May 1, 2023-October 31, 2023

Unit Name	Event Type*	Event Start	Event End	Event Description
Big Sandy 1	FO	5/28/2023 17:34	5/28/2023 21:37	Tripped - reason unknown
Big Sandy 1	FO	9/11/2023 9:09	9/11/2023 13:59	Potential card failure
Big Sandy 1	PO	4/8/2023 2:25	5/13/2023 12:00	Boiler i/r, 600V Breaker upgrade.
Big Sandy 1	MO	6/13/2023 7:00	6/17/2023 7:00	Request Maintenance Outage from 6-13-2023 0700hrs through 6-17-2023 @ 0700hrs
Big Sandy 1	PO	9/16/2023 1:24	10/14/2023 9:56	Boiler i/r, Corrosion Fatigue i/r, Cooling Tower i/r, Furnace Wall i/r.Installing new 600v breakers
Big Sandy 1	RS	6/13/2023 0:56	6/13/2023 7:00	Reserve Shutdown
Big Sandy 1	RS	6/17/2023 7:00	6/18/2023 5:58	Reserve Shutdown
Big Sandy 1	FO	7/5/2023 12:51	7/5/2023 19:51	unknown
Mitchell 1	PO	4/15/2023 4:31	5/12/2023 18:00	Boiler i/r, Precipitator i/r, Sicon Conveyor Tail Pulley structural steel repairs, relocation of the 2#4 River Water feed to FGD in the foundation of the new ash bunker, BOP repairs, dual outage to prep for Fall Outage.
Mitchell 1	PO	9/9/2023 5:29	12/6/2023 5:56	HP/RH Turbine replacement, LPT A replacement, Cooling Tower i/r, AH Basket i/r, BFPT Stop and Control Valve i/r, ID Fan i/r, Precip i/r.
Mitchell 1	FO	6/15/2023 15:12	6/23/2023 6:32	Lower furnace tube leak, 2 tube leaks were identified on the lower rear slope directly below the burners.
Mitchell 1	FO	7/27/2023 9:43	8/6/2023 19:30	Steam Generator Tube Leak, replaced 6 tubes on the side wall and 12 tubes on the north wall due to damage from the initial leak. The initial leak was located in the north east 5th floor corner tube.
Mitchell 1	FO	5/12/2023 18:00	5/19/2023 7:25	Outage due to condensate contamination with Urea from Hydrolyzer system entering the Condensate Return System. Determined the source of contamination to be urea solution transfer pumps through the seal water line.
Mitchell 1	RS	6/23/2023 6:32	6/24/2023 11:01	Reserve Shutdown
Mitchell 1	FO	5/19/2023 11:27	5/20/2023 1:57	Lost Steam to the Feed Pump due to aux boiler trip during startup.
Mitchell 2	PO	9/11/2023 1:36	11/19/2023 17:33	Boiler i/r, Chemical Clean, Furnace Wall i/r. Boiler i/r, CCR/ELG Project.
Mitchell 2	MO	5/15/2023 1:27	6/1/2023 0:00	Repair #3 Control Valve, Boiler i/r, Boiler Feed Pump #2 Bearing oil leak repairs, FMO 402 (Second RH By-Pass Valve) repairs.
Mitchell 2	FO	6/1/2023 0:00	6/8/2023 20:33	EHC fluid contamination from failing valve actuator on #3 control valve found during startup. Vendor brought back on site to clean and filter EHC system after replacing actuator.

Event Type *

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

Kentucky Power Company
KPSC Case No. 2024-00144
Commission Staff's First Set of Data Requests
Dated August 2, 2024

DATA REQUEST

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

RESPONSE

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

Witness: Jason M. Stegall

Kentucky Power Company
KPSC Case No. 2024-00144
Commission Staff's First Set of Data Requests
Dated August 2, 2024

DATA REQUEST

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

RESPONSE

Please see KPCO_R_KPSC_1_17_Attachment1 for the requested information.

Witness: Paul J. Massie

Kentucky Power Company Fuel Adjustment Case No. 2024-00144 Generating Unit Net Capacity Factor [%] May 1, 2023-October 31, 2023						
	Nov-21	Dec-21	Jan-22	Feb-22	Mar-22	Apr-22
Big Sandy 1	24.47	44.85	66.28	63.45	29.12	46.14
Mitchell 1	16.19	40.05	51.68	31.71	12.15	0.00
Mitchell 2	21.35	40.93	74.07	51.40	16.39	0.00

Kentucky Power Company Fuel Adjustment Case No. 2024-00144 Generating Unit Equivalent Availability Factor [%] May 1, 2023-October 31, 2023						
	Nov-21	Dec-21	Jan-22	Feb-22	Mar-22	Apr-22
Big Sandy 1	56.95	86.10	96.85	98.74	46.68	56.14
Mitchell 1	37.94	71.33	70.88	80.50	25.54	0.00
Mitchell 2	42.73	69.93	97.29	97.89	30.33	0.00

Kentucky Power Company
KPSC Case No. 2024-00144
Commission Staff's First Set of Data Requests
Dated August 2, 2024

DATA REQUEST

KPSC 1_18 For the period under review, explain whether Kentucky Power made any changes to its maintenance and operation practices or completed any specific generation efficiency improvements that affect fuel usage at Kentucky Power's generation facilities. If so, describe the impact of these changes on Kentucky Power's fuel usage.

RESPONSE

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

Witness: Paul J. Massie

Kentucky Power Company
KPSC Case No. 2024-00144
Commission Staff's First Set of Data Requests
Dated August 2, 2024

DATA REQUEST

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

RESPONSE

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

Witness: Kimberly K. Chilcote

Witness: Clinton M. Stutler

Kentucky Power Company
KPSC Case No. 2024-00144
Commission Staff's First Set of Data Requests
Dated August 2, 2024

DATA REQUEST

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

RESPONSE

Kentucky Power is not aware of any such violations.

Witness: Lerah M. Kahn

Kentucky Power Company
KPSC Case No. 2024-00144
Commission Staff's First Set of Data Requests
Dated August 2, 2024

DATA REQUEST

KPSC 1_21 State whether all fuel contracts related to commodity and transportation have been filed with the Commission. If any contracts have not been filed, explain why they have not been filed, and provide a copy.

RESPONSE

All such contracts have been filed with the Commission.

Witness: Lerah M. Kahn

Kentucky Power Company
KPSC Case No. 2024-00144
Commission Staff's First Set of Data Requests
Dated August 2, 2024

DATA REQUEST

KPSC 1_22 Identify any customers, either by class of customer or pursuant to special contract, that are not billed a FAC charge.

RESPONSE

All Kentucky Power customers, including those with special contracts, are billed a FAC charge.

Witness: Lerah M. Kahn

Kentucky Power Company
KPSC Case No. 2024-00144
Commission Staff's First Set of Data Requests
Dated August 2, 2024

DATA REQUEST

KPSC 1_23 If any customer class or special contract has or is not being charged a FAC, state the date when the FAC ceased being charged.

RESPONSE

Not applicable.

Witness: Lerah M. Kahn



Chilcote Discovery Verification Form.doc

DocVerify ID: 28B63E1A-6EED-41BD-81DE-950C0F70A82B
 Created: August 21, 2024 09:40:31 -8:00
 Pages: 2
 Remote Notary: Yes / State: KY

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E-Signature Summary

E-Signature 1: Kimberly Chilcote (KKC)
 August 22, 2024 06:34:46 -8:00 [CCB949524C91] [107.77.202.49]
 kkchilcote@aep.com (Principal) (Personally Known)

E-Signature Notary: Marilyn Michelle Caldwell (MMC)
 August 22, 2024 06:34:46 -8:00 [97EAD066C53A] [167.239.221.104]
 mmcaldwell@aep.com
 I, Marilyn Michelle Caldwell, did witness the participants named above electronically sign this document.



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VERIFICATION

The undersigned, Kimberly K. Chilcote, being duly sworn, deposes and says she is the Director Coal and Reagent Procurement 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
Signature 2024/08/22 08:44:40 -0400

Kimberly K. Chilcote

Commonwealth of Kentucky)

) Case No. 2024-00144

County of Boyd)

Subscribed and sworn to before me, a Notary Public in and before said County and State, by Kimberly K. Chilcote, on August 22, 2024.

Marilyn Michelle Caldwell
Signature 2024/08/22 08:44:40 -0400

Notary Public

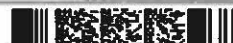
MARILYN MICHELLE CALDWELL
ONLINE NOTARY PUBLIC
STATE AT LARGE KENTUCKY
Commission # KYNP71841
My Commission Expires May 05, 2027

My Commission Expires May 5, 2027

Notarial act performed by audio-visual communication

Notary ID Number KYNP71841

28B63E1A-6EED-41BD-81DE-950C0F70A82B — 2024/08/21 08:40:31 -8:00 — Remote Notary





Massie Discovery 2024-00144 Verification Form.doc

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Created: August 21, 2024 10:08:41 -8:00
Pages: 3
Remote Notary: Yes / State: KY

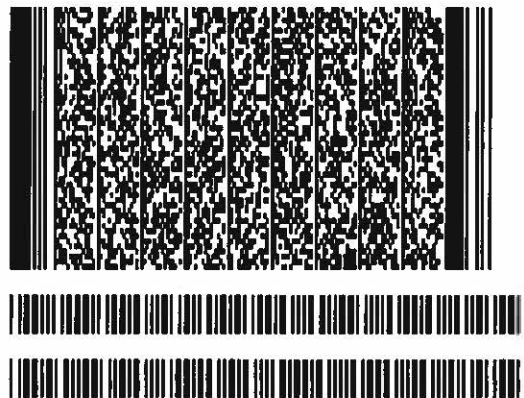
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E-Signature Summary

E-Signature 1: Paul J. Massie (PJM)
August 22, 2024 05:33:19 -8:00 [7AEB4BE6CDE2] [167.239.221.101]
pjmassie@aep.com (Principal) (Personally Known)

E-Signature Notary: Marilyn Michelle Caldwell (MMC)
August 22, 2024 05:33:19 -8:00 [5CE7FE4ED33A] [167.239.221.104]
mmcaldwell@aep.com
I, Marilyn Michelle Caldwell, did witness the participants named above electronically sign this document.



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VERIFICATION

The undersigned, Paul J. Massie, being duly sworn, deposes and says he is the Vice President Generating Assets 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.

Paul J. Massie

Paul J. Massie

Commonwealth of Kentucky)
County of Boyd)

Case No. 2024-00144

Subscribed and sworn to before me, a Notary Public in and before said County and State, by Paul J. Massie, on August 22, 2024.

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

AFFD9833-5A14-42A2-9915-7F937FE155C5 -- 2024/08/21 10:08:41 -5:00 --- Remote Notary





Stegall Discovery Verification Form.doc

DocVerify ID: 026BB2FD-A14B-43F2-BE0D-8FF3DFC9AD25
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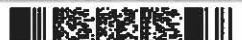
E-Signature Summary

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.



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VERIFICATION

The undersigned, Clinton M. Stutler, being duly sworn, deposes and says he is the Director Natural Gas Procurement for American Electric Power Service Corporation, that he has personal knowledge of the matters set forth in the foregoing responses and the information contained therein is true and correct to the best of his information, knowledge, and belief.

Clinton M. Stutler

Clinton M. Stutler

State of Ohio)
Franklin County)

Case No. 2024-00144

Subscribed and sworn to before me, a Notary Public in and before said County and State, by Clinton M. Stutler, on August 21, 2024.

Donna J. Stephens

Notary Public

My Commission Expires January 4, 2029

Notary ID Number _____



DONNA J STEPHENS
NOTARY PUBLIC
STATE OF OHIO
Comm. Expires
01-04-2029