

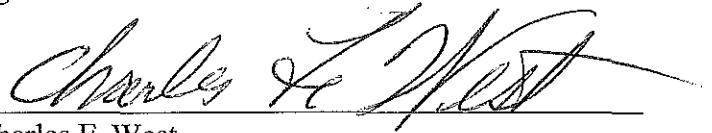






**VERIFICATION**

The undersigned, Charles F. West, being duly sworn, deposes and says he is the Manager, Coal Procurement, for American Electric Power Service Corporation, that he has personal knowledge of the matters set forth in the forgoing data response for which he is identified as the witness and that the information contained therein is true and correct to the best of his information, knowledge and belief



Charles F. West

STATE OF OHIO

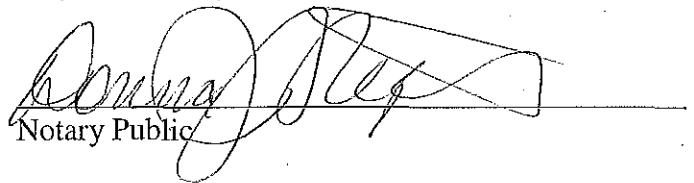
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) Case No. 2016-00001

COUNTY OF FRANKLIN

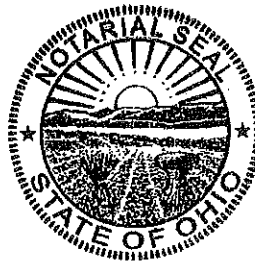
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Subscribed and sworn to before me, a Notary Public in and before said County and State, by Charles F. West, this the 18<sup>th</sup> day of February, 2016.



Notary Public

My Commission Expires: 1/4/2019



**Donna J. Stephens**  
Notary Public, State of Ohio  
My Commission Expires 01-04-2019

**Kentucky Power Company**

**REQUEST**

For the period from May 1, 2015, through October 31, 2015, list each vendor from whom coal was purchased and the quantities and the nature of each purchase (i.e., spot or contract). For the period under review in total, provide the percentage of purchases that were spot versus contract. For contract purchases, state whether the contract has been filed with the Commission. If no, explain why it has not been filed .

**RESPONSE**

Please see [KPCO\\_R\\_PSC\\_1\\_1\\_Attachment1.pdf](#) to this response for a listing of each vendor from which coal was purchased, the quantities, the nature of each coal purchase, and the percentage of purchases that were spot versus contract during the period from May 1, 2015 to October 31, 2015. Contracts for all contract purchases have been filed with the Commission.

**WITNESS:** Charles F West

**Kentucky Power Company**

**REQUEST**

For the period from May 1, 2015, through October 31, 2015, 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). For contract purchases, state whether the contract has been filed with the Commission. If no, explain why it has not been filed.

**RESPONSE**

Kentucky Power did not purchase natural gas for generation during the review period of May 1, 2015 to October 31, 2015.

**WITNESS:** Charles F West

**Kentucky Power Company**

**REQUEST**

State whether Kentucky Power engages in hedging activities for its coal or natural gas purchases used for generation. If yes, describe the hedging activities in detail.

**RESPONSE**

Kentucky Power does not engage in hedging activities for its coal purchases used for generation. Kentucky Power does not currently purchase natural gas for generation and hence does not engage in natural gas hedging activities.

**WITNESS:** Charles F West

**Kentucky Power Company**

**REQUEST**

For each generating station or unit for which a separate coal pile is maintained, state, for the period from May 1, 2015, through October 31, 2015, the actual amount of coal burned in tons, the actual amount of coal deliveries in tons, the total kWh generated, and the actual capacity factor at which the plant operated.

**RESPONSE**

Big Sandy

Coal Burned, tons	378,113
Coal Delivered, tons	336,059
Total Generated MWh	936,300
Capacity Factor	51.4

Mitchell

Coal Burned, tons	540,848
Coal Delivered, tons	574,701
kWH Net Generated	1,311,177,500
Capacity Factor	38.07

**WITNESS:** David L Mell and Daniel L. Moyer



**Kentucky Power Company**

**REQUEST**

List all firm power commitments for Kentucky Power from May 1, 2015, through October 31, 2015, for (a) purchases and (b) sales. This list shall identify the electric utility, the amount of commitment in MW, and the purpose of the commitment (i.e., peaking, emergency).

**RESPONSE**

- (a) Firm power purchases for Kentucky Power for the period from May 1, 2015 through October 31, 2015:

AEP Generating Company (Unit Power  
Agreement - Rockport Plant Base Load)            393 MW

- (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 peak load during the review period from May 1, 2015 to October 31, 2015. The cities use the power for load-following service to their citizens.

City of Olive Hill            4.6 MW  
City of Vanceburg            11.6 MW

**WITNESS:** John A Rogness

**Kentucky Power Company**

**REQUEST**

Provide a monthly billing summary of sales to all electric utilities for the period May 1, 2015, through October 31, 2015.

**RESPONSE**

Please see KPCO\_R\_PSC\_1\_6\_Attachment1.xls for this response.

**WITNESS:** John A Rogness

**Kentucky Power Company**

**REQUEST**

List Kentucky Power's scheduled, actual, and forced outages from May 1, 2015, through October 31, 2015.

**RESPONSE**

Please see KPCo\_R\_PSC\_1\_7\_Attachment1.xls for this response.

**WITNESS:** David L Mell and Daniel L. Moyer

**Kentucky Power Company**

**REQUEST**

List all existing fuel contracts categorized as long-term (i.e., one year or more in length). Provide the following information for each contract:

- a. Supplier's name and address;
- b. Name and location of production facility;
- c. Date when contract was executed;
- d. Duration of contract;
- e. Date(s) of each contract revision, modification, or amendment;
- f. Annual tonnage requirements;
- g. Actual annual tonnage received since the contract's inception;
- h. Percentage of annual requirements received during the contract's term;
- i. Base price in dollars per ton;
- j. Total amount of price escalations to date in dollars per ton; and
- k. Current price paid for coal under the contract in dollars per ton (i + j).

**RESPONSE**

Please see KPCO\_R\_PSC\_1\_8\_Attachment1 for the requested information.

**WITNESS:** Charles F West

## **Kentucky Power Company**

### **REQUEST**

- a. State whether Kentucky Power regularly compares the price of its coal purchases to those paid by other electric utilities.
- b. If yes, state:
  - (1) How Kentucky Power's prices compare with those of other utilities. If the comparison includes months outside of the review period, a comparison limited to the review period should be provided separately. Provide a copy of the source documents and calculations used to support the amounts used in the comparison and include all prices used in the comparison in cents per MMBtu.
  - (2) The utilities that is included in this comparison and their locations.

### **RESPONSE**

- a. The Company performs a comparison of its coal purchases at least twice a year. Additionally, all purchase decisions are evaluated against the market at the time of the purchase to ensure the competitiveness of the purchase.
- b. (1) and (2): “KPCo\_R\_KPSC1\_9\_Attachment1.pdf” and “KPCo\_R\_KPSC1\_9\_Attachment2.pdf” contain comparisons of Kentucky Power’s fuel prices to fuel prices of other utilities. The fuel cost data was obtained from Velocity Suite which is a search engine that, in this case, used monthly fuel cost information from the U.S. Energy Information Agency Form 923 for the period of May 1, 2015 through October 31, 2015.

“KPCo\_R\_KPSC1\_Attachment1.pdf” shows that, for the companies included in the comparison, Kentucky Power had the third lowest fuel costs for the review period on a calculated cents per million British Thermal Units (MMBtu) basis. It should be noted that the fuel being delivered to the compared facilities may not be of the same quality or mixture as that being delivered to Kentucky Power. A review of the sulfur data shows that Kentucky Power purchased coal with the second lowest sulfur content of all of the companies included in the comparison.

**KPSC Case No. 2016-00001**  
**Commission Staff's First Set of Data Requests**  
**Order Dated February 5, 2016**  
**Item No. 9**  
**Page 2 of 2**

For additional reference, "KPCo\_R\_KPSC1\_9\_Attachment2.pdf" compares companies purchasing a lower sulfur coal than the first comparison group. In this comparison, Kentucky Power had the lowest fuel costs in the review period on a calculated cents per MMBtu basis. However, it should be noted that the fuel being delivered to these facilities may not be of the same quality or mixture as that being delivered to Kentucky Power. A review of the sulfur data shows that Kentucky Power purchased coal with sulfur content higher than four of the companies included in the comparison group, and lower than two of the companies included in the comparison group.

Please see KPCo\_R\_KPSC1\_9\_Attachment3.xls for the data from the U.S. Energy Information Agency (EIA) Form 923 for the period of May 1, 2015 through October 31, 2015. This data was obtained via Velocity Suite, which is a search engine that gathers publicly available information. The averages and totals presented in Attachment 3 are a function of pivot tables applied to the Velocity Suite data.

**WITNESS:** Charles F West

**Kentucky Power Company**

**REQUEST**

State the percentage of Kentucky Power's coal, as of the date of this Order, that is delivered by:

- a. Rail;
- b. Truck; or
- c. Barge.

**RESPONSE**

From May 1, 2015 through October 31, 2015, the percentage of Kentucky Power's coal delivery method\* is as follows:

- a. Rail: 3%
- b. Truck: 20%
- c. Barge: 48%

\*Please note that a portion of Mitchell generating station's coal is delivered by a belt conveyor system from an adjacent mine. The 29% balance of coal, not accounted for in the percentage by transportation modes above, was delivered by belt conveyor system.

**WITNESS:** Charles F West

## **Kentucky Power Company**

### **REQUEST**

- a. State Kentucky Power's coal inventory level in tons and in number of days' supply as of October 31, 2015. Provide this information by generating station and in the aggregate.
- b. Describe the criteria used to determine number of days' supply.
- c. Compare Kentucky Power's coal inventory as of October 31, 2015, to its inventory target for that date for each plant and for total inventory.
- d. If actual coal inventory exceeds inventory target by ten days' supply, state the reasons for excessive inventory.
- e. (1) State whether Kentucky Power expects any significant changes in its current coal inventory target within the next 12 months.  
  
(2) If yes, state the expected change and the reasons for this change.

### **RESPONSE**

- a. As of October 31, 2015 Kentucky Power's actual coal inventory levels (company share) were as follows:

Big Sandy: 13,075 tons, or 5 days of supply  
Mitchell High Sulfur: 161,862 tons, or 42 days of supply  
Mitchell Low Sulfur: 166,353 tons, or 44 days of supply



**KPSC Case No. 2016-00001**  
**Commission Staff's First Set of Data Requests**  
**Order Dated February 5, 2016**  
**Item No. 11**  
**Page 2 of 2**

- b. Days' supply is determined by dividing the tons of coal in storage by the full load burn rate (tons per day).

For Big Sandy,  $\frac{13,075 \text{ tons in storage as of 10/31/2015}}{2,517 \text{ (full load burn rate - tons/day)}} = 5 \text{ days}$

For Mitchell High Sulfur,  $\frac{161,862 \text{ tons in storage as of 10/31/2015}}{3,810 \text{ (full load burn rate* - tons/day)}} = 42 \text{ days}$

For Mitchell Low Sulfur,  $\frac{166,353 \text{ tons in storage as of 10/31/2015}}{3,810 \text{ (full load burn rate* - tons/day)}} = 44 \text{ days}$

\*Company share of full load burn rate.

- c. As of October 31, 2015,

Big Sandy: Target Inventory Days = 30 days, Actual Inventory Days = 5 days  
(25 days under target)

Mitchell High Sulfur: Target Inventory Days = 15 days, Actual Inventory Days =  
42 days (27 days over target)

Mitchell Low Sulfur: Target Inventory Days = 30 days, Actual Inventory Days =  
44 (14 days over target)

- d. Fall maintenance outages in September and October at the Mitchell plant, along with low power prices and weaker than usual demand, markedly reduced coal consumption. In addition, the inventory increased due to contractual supply commitments.

- e. (1) Yes.

(2) Big Sandy Unit 2 retired in May 2015, and Big Sandy Unit 1 stopped consuming coal in November 2015 in advance of that unit converting to natural gas. As of November 12, 2015 all coal inventory at Big Sandy had been consumed.

Kentucky Power does not expect any significant changes in the coal inventory target for the Mitchell plant within the next 12 months.

**WITNESS:** Charles F West

**Kentucky Power Company**

**REQUEST**

- a. State whether Kentucky Power has audited any of its coal contracts during the period from May 1, 2015, through October 31, 2015.
- b. If yes, for each audited contract:
  - (1) Identify the contract;
  - (2) Identify the auditor;
  - (3) State the results of the audit; and
  - (4) Describe the actions that Kentucky Power took as a result of the audit.

**RESPONSE**

- a. Kentucky Power did not audit any of its coal contracts during the review period from May 1, 2015 to October 31, 2015.
- b. N/A.

**WITNESS:** Charles F West

**Kentucky Power Company**

**REQUEST**

- a. State whether Kentucky Power has received any customer complaints regarding its FAC during the period from May 1, 2015, through October 31, 2015.
- b. If yes, for each complaint, state:
  - (1) The nature of the complaint; and
  - (2) Kentucky Power's response.

**RESPONSE**

The Company did not receive any complaints regarding its FAC during the review period.

**WITNESS:** John A Rogness

**Kentucky Power Company**

**REQUEST**

- a. State whether Kentucky Power is currently involved in any litigation with its current or former coal suppliers.
- b. If yes, for each litigation:
  - (1) Identify the coal supplier;
  - (2) Identify the coal 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 .
- c. State the current status of all litigation with coal suppliers.

**RESPONSE**

- a. Kentucky Power is not currently involved in any litigation with its current or former coal suppliers.
- b. N/A.
- c. N/A.

**WITNESS:** Charles F West

## **Kentucky Power Company**

### **REQUEST**

- a. During the period from May 1, 2015, through October 31, 2015, have there been any changes to Kentucky Power's written policies and procedures regarding its fuel procurement?
- b. 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.
- c. If no, provide the date Kentucky Power's current fuel procurement policies and procedures were last changed, when they were last provided to the Commission, and identify the proceeding in which they were provided.

### **RESPONSE**

- a. There were no changes to Kentucky Power's written policies and procedures regarding its fuel procurement during the period from May 1, 2015 through October 31, 2015.
- b. N/A.
- c. Kentucky Power's Fuel Procurement Policy was last updated in September 2012 and was provided to the Commission in Case No. 2012-00550 in March 2013.

**WITNESS:** Charles F West

**Kentucky Power Company**

**REQUEST**

- a. 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 from May 1, 2015, through October 31, 2015.
- b. If yes, for each violation:
  - (1) Describe the violation;
  - (2) Describe the action(s) that Kentucky Power took upon discovering the violation; and
  - (3) Identify the person(s) who committed the violation.

**RESPONSE**

- a. Kentucky Power is not aware of any violations of its policies and procedures regarding fuel procurement prior to or during the period from May 1, 2015 to October 31, 2015.
- b. N/A.

**WITNESS:** Charles F West

## **Kentucky Power Company**

### **REQUEST**

Identify and explain the reasons for all changes in the organizational structure and personnel of the departments or divisions that are responsible for Kentucky Power's fuel procurement activities that occurred during the period from May 1, 2015, through October 31, 2015.

### **RESPONSE**

During the period May 1, 2015 through October 31, 2015 the number of fuel buyer positions in the "Coal" group and the "Reagents and Coal Combustion Products" group was reduced from three to two in each group. The reductions were made to align staffing with personnel needs in each group.

Please see [KPCO\\_R\\_PSC\\_1\\_17\\_Attachment1.pdf](#) for the organizational chart as of October 31, 2015.

**WITNESS:** Charles F West

**Kentucky Power Company**

**REQUEST**

- a. Identify all changes that Kentucky Power has made during the period under review to its maintenance and operation practices that also affect fuel usage at Kentucky Power's generation facilities.
- b. Describe the impact of these changes on Kentucky Power's fuel usage.

**RESPONSE**

- a-b. While Unit 2 at Big Sandy retired as of June 1, 2015, no other changes occurred at Big Sandy or Mitchell during the review period to its maintenance and operation practices that would affect fuel usage.

**WITNESS:** David L Mell and Daniel L. Moyer



## **Kentucky Power Company**

### **REQUEST**

List each written coal-supply solicitation issued during the period from May 1, 2015, through October 31, 2015.

- 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 time 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) Please see KPCo\_R\_KPSC1\_19\_Attachment5.pdf for the requested information other than the bid analyses and related information. For the bid analyses and related information please see:

KPCo\_R\_KPSC1\_19\_Attachment1\_CONFIDENTIAL.pdf  
KPCo\_R\_KPSC1\_19\_Attachment2\_CONFIDENTIAL.pdf  
KPCo\_R\_KPSC1\_19\_Attachment3\_CONFIDENTIAL.pdf  
KPCo\_R\_KPSC1\_19\_Attachment4\_CONFIDENTIAL.pdf.

Confidential treatment is being sought for indicated portions of the Attachment1\_CONFIDENTIAL through Attachment4\_CONFIDENTIAL.

**WITNESS:** Charles F West

## **Kentucky Power Company**

### **REQUEST**

List each oral coal-supply solicitation issued during the period from May 1, 2015, through October 31, 2015.

- 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 time 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**

Kentucky Power did not issue oral coal supply solicitations during the period from May 1, 2015 to October 31, 2015.

**WITNESS:** Charles F West

## **Kentucky Power Company**

### **REQUEST**

- a. List all intersystem sales during the period under review in which Kentucky Power used a third party's transmission system.
- b. For each sale listed above:
  - (1) Describe the effect on the FAC calculation of line losses related to intersystem sales when using a third party's transmission system; and
  - (2) State the line-loss factor used for each transaction and describe how that line-loss factor was determined.

### **RESPONSE**

- a. Kentucky Power sells 100% of its generation to PJM. These sales are made at the generation station and do not use a third party transmission system.
- b. 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.

**WITNESS:** John A Rogness

**Kentucky Power Company**

**REQUEST**

- a. Describe the effect on the FAC calculation of line losses related to intersystem sales when not using a third party's transmission system.
- b. Describe each change that Kentucky Power made to its methodology for calculating intersystem sales line losses during the period under review.

**RESPONSE**

- a. Line losses related to intersystem sales are excluded from the FAC calculation and thus do not affect it.
- b. Kentucky Power did not make any changes to its methodology for calculating intersystem sales line losses during the review period.

**WITNESS:** John A Rogness

**Kentucky Power Company**

**REQUEST**

State whether, during the period under review, Kentucky Power has solicited bids for coal with the restriction that it was not mined through strip mining or mountaintop removal. If yes, explain the reasons for the restriction on the solicitation, the quantity in tons and price per ton of the coal purchased as a result of this solicitation, and the difference between the price of this coal and the price it could have obtained for the coal if the solicitation had not been restricted.

**RESPONSE**

No. During the review period, Kentucky Power did not solicit bids for coal with the restriction that it was not mined through strip mining or mountaintop removal.

**WITNESS:** Charles F West

**Kentucky Power Company**

**REQUEST**

Provide a detailed discussion of any specific generation efficiency improvements Kentucky Power has undertaken during the period under review.

**RESPONSE**

The Company made no efficiency improvements at Big Sandy or Mitchell during the review period.

**WITNESS:** David L Mell and Daniel L. Moyer

**Kentucky Power Company**

**REQUEST**

State whether all long-term fuel contracts related to commodity and/or 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 long-term fuel contracts related to commodity and/or transportation have been filed with the Commission.

**WITNESS:** Charles F West

## **Kentucky Power Company**

### **REQUEST**

For each month of the review period, provide Kentucky Power's calculations and supporting data for determining the amount of power purchases in excess of the "peaking unit equivalent" to be excluded from recovery through the FAC.

### **RESPONSE**

The calculations and supporting data used to determine the amount of power purchases in excess of the "peaking unit equivalent" (PUE) to be excluded from recovery through the FAC are presented in the attached files: KPCo\_R\_PSC\_1\_26\_Attachment1.Confidential.xls and KPCo\_R\_PSC\_1\_26\_Attachment2.Confidential.xls. Confidential treatment is being sought for these attachments.

Attachment 1 reflects adjustments to the May 2015 and July through October 2015 calculations of the amount of power purchases in excess of the PUE to be excluded from recovery through the FAC. Although the Company properly calculated the “the lower of the actual energy cost of the non-economy purchased energy or the fuel cost of its highest cost generating unit available to be dispatched to serve native load during the reporting expense month,” Order, *In the Matter of: An Examination Of The Application Of The Fuel Adjustment Clause Of Kentucky Power Company From November 1, 2013 Through April 30, 2014*, Case No. 2014-00225 at 3 (Ky. P.S.C. January 27, 2015). the properly calculated rate was applied to an incorrect number of purchased MWhs during periods of forced outages.

For May 2015 Kentucky Power calculated the amount of purchased power costs to be excluded from the FAC under the PUE-limitation by applying the properly calculated rate to a greater number of MWhs of purchases than required in connection with the PUE limitation. Specifically, in the as-filed calculation for May 2015 the MWh purchases related to forced outages should have been eliminated. Purchased power costs related to forced outages are taken into account in the FAC through the separate forced outage analysis. In calculating the PUE-related limitation, the Company applied the limitation to the full amount of purchased power costs (thus increasing the amount of the exclusion in the FAC) without reflecting the fact that the total costs related to forced outages had been



**KPSC Case No. 2016-00001**  
**Commission Staff's First Set of Data Requests**  
**Order Dated February 5, 2016**  
**Item No. 26**  
**Page 2 of 3**

properly excluded in their entirety from FAC recovery through the forced outage analysis. As a result, the Company erroneously failed to charge (over-excluded) \$4,832 of purchased power costs in connection with the May 2015 PUE calculation.

Conversely, in calculating the July 2015 through October 2015 PUE limitations, Kentucky Power excluded from the PUE-limitation the full number of MWh energy purchases made during forced outages rather than including in the PUE limitation MWhs of purchases required to serve internal demand over and above the forced outage. The result is that for those months Kentucky Power over-collected through the FAC \$11,455 of purchased power costs.

The monthly adjustments for the review period are detailed below:

	Peaking Equivalent As Filed	Unit Exclusion	Peaking Equivalent As Revised	Unit Exclusion	Difference
May 2015	\$ 572,973		\$ 568,140		\$ 4,832
June 2015	\$ 40,123		\$ 40,123		\$ ---
July 2015	\$ 58,373		\$ 58,545		\$ (171)
August 2015	\$ ---		\$ 2,092		\$ (2,092)
September 2015	\$ 63,917		\$ 63,917		\$ ---
October 2015	\$ 64,857		\$ 74,049		\$ (9,192)
<b>TOTAL</b>	<b>\$ 800,243</b>		<b>\$ 806,867</b>		<b>\$ (6,624)</b>

The net over-collection for the review period is \$6,624 of purchased power costs. Kentucky Power proposes to refund the \$6,624 over-collection in the first month's FAC filing after the Commission Order approving the refund.

Following its review of the review period calculations, the Company also reviewed the calculations of the PUE limitation for the prior six-month review period of November 2014 - April 2015. Attachment 2 reflects adjustments to the November 2014 through April 2015 calculations of the amount of power purchases in excess of the PUE to be excluded from recovery through the FAC. That review indicated that as with the as-filed May 2015 calculation of the PUE-limitation, Kentucky Power applied the PUE-limitation to the full amount of purchased power costs (thus increasing the amount of the exclusion in the FAC) without reflecting the fact that the total costs related to forced outages had been properly excluded in their entirety from FAC recovery through the forced outage analysis. The summary table below illustrates that for the November 2014 – April 2015 six-month review period the Company failed to charge customers through the FAC for \$205,322 of properly recoverable purchased power costs:

**KPSC Case No. 2016-00001**  
**Commission Staff's First Set of Data Requests**  
**Order Dated February 5, 2016**  
**Item No. 26**  
**Page 3 of 3**

	Peaking Equivalent As Filed	Unit Exclusion	Peaking Equivalent As Revised	Unit Exclusion	Difference
November 2014	\$ 225,392		\$ 55,704		\$ 169,688
December 2014	\$ 170,252		\$ 167,916		\$ 2,335
January 2015	\$ 3		\$ 3		\$ ---
February 2015	\$ 232,812		\$ 232,693		\$ 119
March 2015	\$ 234,199		\$ 201,020		\$ 33,179
April 2015	\$ ---		\$ ---		\$ ---
TOTAL	\$ 862,657		\$ 657,335		\$ 205,322

WITNESS: John A Rogness