## BOEHM, KURTZ & LOWRY

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Via Overnight Mail

May 9, 2012

Mr. Jeff Derouen, Executive Director Kentucky Public Service Commission 211 Sower Boulevard Frankfort, Kentucky 40602

## Re: <u>Case No. 2011-00401</u>

Dear Mr. Derouen:

Please find enclosed the original and twelve (12) copies of Revised Exhibit \_\_(LK-8) to the Direct Testimony and Exhibits of Lane Kollen. For the record, this exhibit was substituted for the original exhibit at the hearing.

By copy of this letter, all parties listed on the Certificate of Service have been served. Please place this document of file.

Very Truly Yours,

Michael L. Kurtz, Esq. Kurt J. Boehm, Esq. BOEHM, KURTZ & LOWRY

MLKkew Attachment cc: Certificate of Service RECEIVED

MAY 10 2012 PUBLIC SERVICE COMMISSION

## **CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing was served by mailing a true and correct copy via electronic mail (when available) and regular U.S. Mail to all parties on this 9<sup>th</sup> day of April, 2012.

Michael L. Kurtz, Esq. Kurt J. Boehm, Esq.

Honorable Joe F Childers Attorney at Law 201 West Short Street Suite 310 Lexington, KENTUCKY 40507

Shannon Fisk Senior Attorney Natural Resources Defense Council 2 N. Riverside Plaza, Suite 2250 Chicago, ILLINOIS 60660

Jennifer B Hans Assistant Attorney General's Office 1024 Capital Center Drive, Ste 200 Frankfort, KENTUCKY 40601-8204

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Honorable Mark R Overstreet Attorney at Law Stites & Harbison 421 West Main Street P. O. Box 634 Frankfort, KENTUCKY 40602-0634

## **COMMONWEALTH OF KENTUCKY**

## **BEFORE THE PUBLIC SERVICE COMMISSION**

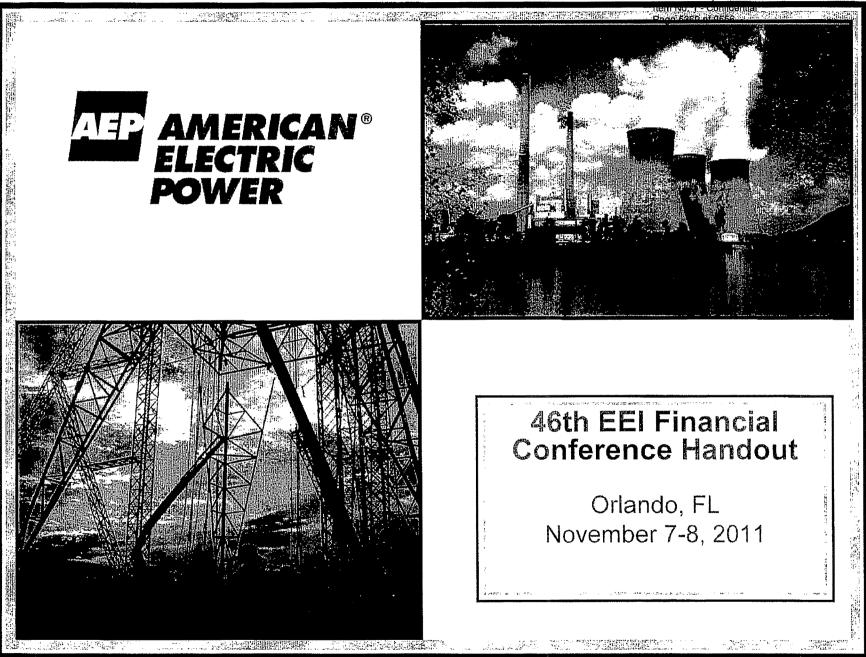
## **IN THE MATTER OF:**

APPLICATION OF KENTUCKY POWER	)	
<b>COMPANY FOR APPROVAL OF ITS 2011</b>	)	
ENVIRONMENTAL COMPLIANCE PLAN,	)	
FOR APPROVAL OF ITS AMENDED	)	
ENVIRONMENTAL COST RECOVERY	)	CASE NO. 2011-00401
SURCHARGE TARIFF, AND FOR THE	)	
<b>GRANT OF A CERTIFICATE OF PUBLIC</b>	)	
<b>CONVENIENCE AND NECESSITY FOR THI</b>	E)	
CONSTRUCTION AND ACQUISITION OF	)	
RELATED FACILITIES	)	

## **REVISED**

EXHIBIT \_\_ (LK-8)

KPSC Case No. 2011-00401 Sierra Club's First Set of Data Requests Dated January 13, 2012



KPSC Case No. 2011-00401 Sierra Club's First Set of Data Requests Dated January 13, 2012 Item No. 1 - Confidential Page 5389 of 9556

# **AEP Coal Fleet Assessment**



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Least Exposed	Operating Company MW APCo 3,353 AEP Ohio 6,984 10,337	2012 <u>Range of Capit</u> Rules Water Rules <sup>(2)</sup> CCR Rules Air Rules <sup>(3)</sup>	tal (S		\$	<mark>5) (1)</mark> High 20 1,080 1,900	(1) The impact of all rules continues to be under review. Project scope and technical assessments are ongoing. Any change in scope will impact the capital cost ranges.	
Partially Exposed	Operating           Company         MW           AEP Ohio         1,385           APCo         470           I&M         3,120           PSO         1,036           SWEPCo         2,162           TNC         377           8,550	<b>Rules</b> Water Rules <sup>(2)</sup> CCR Rules Air Rules <sup>(3) (4)</sup>	L \$ \$ \$	<b>0₩</b> 55 385 2,680	\$	High 85 520 3,565	<ul> <li>(2) Gas plants are not included in MW. Proposed 316 (b) will impact some gas facilities.</li> <li>(3) Air Rules include: CSAPR as finalized and HAPs and Regional Haze Federal Implementation Plans in OK &amp; AR, as proposed.</li> <li>(4) Includes NSR Compliance.</li> </ul>	
Fully Exposed	Operating	Rules Low			High	(5) Includes Big Sandy Unit 2, which remains fully		
	Company MW AEP Ohio 2,538	Water Rules (2)	\$	-	\$	5	exposed but,	
	APCo 1,270	CCR Rules	\$	30	\$	45	pending regulatory approval, will be	
	I&M 495	Air Rules <sup>(3)</sup>	\$	30	\$	50	scrubbed rather than replaced with	
	KPCo 1,078 <sup>(5)</sup> SWEPCO <u>528</u>	Replacement Generation	\$	570	\$	730	new natural gas generation.	
	5,909	Grand Total	\$	6,000	\$	8,000		21

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# **Retrofits/New Generation**

□ The tables below represent our estimated \$6 - \$8 billion capital investment from 2012 to 2020 for environmental retrofits on 10,500 MW and new/refueled generation of 2,152 MW. The below costs include management estimates for compliance with CSAPR, HAPs MACT, CCR and 316(b) regulations as currently proposed.

Operating Company Plant	MW	Type of retrofit	Low Cost Estimate 2012- 2020 (\$MM)	High Cost Estimate 2012- 2020 (\$MM)	Operating Company Plant	MW	Type of retrofit	Low Cost Estimate 2012- 2020 (\$MM)	High Cost Estimate 2012- 2020 (\$MM)
AEP Ohio Conesville 5	400	SCR, DSI			PSO Northeastern 3	470	FGD, ACI, Baghouse		
Conesville 6	400	SCR, DSI			Northeastern 4	465	FGD, ACI, Baghouse		
Muskingum River 5/6*	510	Refuel/ New Natural Gas			Oklaunion	101	FGD upgrade, ACI		
Gavin 1	1,320	FGD upgrade			Total MW	1,036	Total Expected Cost	700	940
Gavin 2	1,320	FGD upgrade							
Zimmer 1	330	FGD upgrade			SWEPCO Flint Creek	264	FGD, ACI, Baghouse		
Total MW	4,280	Total Expected Cost	2,100	2,800 **	Welsh 1	528	ACI, DSI, Baghouse		
					Weish 3	528	ACI, DSI, Baghouse		
APCO Clinch River 1***	211	Refuel with Natural Gas			Pirkey	580	ACI, Baghouse		
Clinch River 2***	211	Refuel with Natural Gas			Dolet Hills	262	ACI, Baghouse		
Dresden	580	New Natural Gas			Total MW	2,162			
Total MW	1,002	Total Expected Cost	580	765 ****			Total Expected Cost	900	1,200
I&M Rockport 1	1,310	FGD, SCR			TNC Oklaunion	377	FGD upgrade, ACI		
Rockport 2	1,310	FGD, SCR			Total MW	377	Total Expected Cost	80	100
Tanners Creek 4	500	DSI, ACI							
Total MW	3,120	Total Expected Cost	1,240	1,670 *****					

525

800 \*Both options remain viable depending on outcome of ESP stipulation

800

\*\*Assumes corporate separation in Ohio is approved and the investment is able to clear the market

**Total Expected Cost** 

FGD

\*\*\*Retired Plant 235MW

KPCO Big Sandy 2

Total MW

\*\*\*\* Total capital invested is expected to be \$366 million for the Dresden plant once completed; \$343 million of which is forecasted to be spent prior to 2012,

\*\*\*\*\* Includes AEG portion of costs related to Rockport upgrade

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# Retirements



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Operating Company	Plant	MW	<b>Expected Retirement</b>
AEP Ohio	Sporn 5	450	2011
	Conesville 3	165	2012
	Muskingum River 1-4	840	2014
	Picway 5	100	2014
	Sporn 2-4	300	2014
	Kammer 1-3	630	2014
	Beckjord	53	2014
	Total MW	2,538	
APCO	Glen Lyn 5	95	2014
	Glen Lyn 6	240	2014
	Clinch River 3	235	
	Sporn 1	150	
	Sporn 3	150	2014
	Kanawha River 1	200	2014
	Kanawha River 2	200	2014
	Total MW	1,270	
I&M	Tanners Creek 1	145	2014
	Tanners Creek 2	145	
	Tanners Creek 3	205	2014
	Total MW	495	
KPCo	Big Sandy 1	278	2014
	Total MW	278	
SWEPCO	Welsh 2	528	2014
	Total MW	528	4
	Grand Total	5,109	

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