



Legal Department

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April 8, 2015

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Barcy F. McNeal  
Docketing Division Chief  
Public Utilities Commission of Ohio  
180 East Broad Street  
Columbus, OH 43215

Re: *In the Matter of the Annual Environmental Control Plan under  
Rule 4901:1-41-03(B), Ohio Administrative Code, by AEP Generation Resources Inc.*  
Case No. 15-0685-EL-ECP

Dear Ms. McNeal:

Please find enclosed the 2015 Annual Environmental Control Plan (ECP) filed on behalf of AEP Generation Resources Inc. AEP Generation Resources is not a public utility as defined in Section 4905.02, Revised Code, and its facilities are not owned or operated by a public utility subject to the jurisdiction of the Ohio Public Utilities Commission. The Company submits the attached ECP out of an abundance of caution, and without waiving its arguments as to the Commission's jurisdiction.

Respectfully submitted,

*s/ Anne M. Vogel*

Attorney for AEP Generation Resources Inc.

Attachments

## **AEP Generation Resources Environmental Control Plan**

### **Introduction**

AEP Generation Resources (AEPGR) is committed to protecting the environment while delivering safe, reliable electricity. AEPGR is an affiliate of American Electric Power Company (“AEP”). System wide, AEP has invested approximately \$10 billion in environmental controls and new generation in the last decade.<sup>1</sup> These and previous upgrades to our plants have reduced SO<sub>2</sub> and NO<sub>x</sub> emissions by more than 80 percent since 1990. In addition, mercury emissions have declined by nearly 60 percent since 2001. CO<sub>2</sub> emissions are steadily decreasing as the size of our coal-fired generation fleet decreases and the use of less carbon-intensive natural gas increases, resulting in 2013 CO<sub>2</sub> emissions 21% below 2005 levels.<sup>2</sup>

### **Current Conditions, Planned Activity and Goals**

Exhibit A summarizes the installation status of SO<sub>2</sub>, NO<sub>x</sub>, and mercury control equipment at AEPGR generating units as of March, 2015. The control equipment listed represents installed or planned installations through 2020 that are currently required for compliance with the Clean Air Act (“CAA”), including the Clean Air Act Amendments of 1990 (“CAAA”), NO<sub>x</sub> SIP Call, the Clean Air Interstate Rule (“CAIR”), the Mercury and Air Toxics Standards (“MATS”) Rule, as well as the New Source Review (“NSR”) Consent Decree.

On February 13, 2012, AEP Ohio retired the 450 MW Sporn Unit 5 and on December 31, 2012, the 165 MW Conesville Unit 3. Exhibit B summarizes the generating unit retirements anticipated by AEP Generation Resources as a result of the above rules. AEPGR will retire nearly 2,500 MW of generating capacity by June 1, 2015.

### **Greenhouse Gas (“GHG”) Control**

System-wide, AEP is currently focused on taking practical, short-term actions to reduce carbon emissions, such as improving energy efficiency, investing in the development of cost-effective and less carbon-intensive technologies and evaluating our assets – power plants, office

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<sup>1</sup> <http://www.aepsustainability.com/business/ceo-letter.aspx>

<sup>2</sup> <http://www.aepsustainability.com/performance/environmental/emissions.aspx>

buildings, and mobile fleet – across a range of reasonable scenarios. Longer term, the transformation of our generation business is expected to reduce our reliance on coal and lignite from 61 percent of our generating capacity in 2014 to approximately 51 percent in 2020.<sup>3</sup> AEP affiliates are heavily invested in renewable energy resources, and highly successful energy efficiency programs. This balancing of our fuel resources and demand reduction efforts will move us forward on the path to continued carbon dioxide reductions, helping us achieve our voluntary 2020 goal to reduce GHG emissions by 10 percent from 2010 levels.

While many of the actions described above are initiated at a broader level, the net results are achieved through AEPGR and the AEP operating companies in the form of emission reductions and increased operational experience in managing carbon emissions. In the absence of federal legislation or regulation, these voluntary efforts will continue.

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<sup>3</sup> <http://www.aepsustainability.com/business/strategy/future/>

# Exhibit A

AEP Generation Resources <sup>A</sup> Unit Control Equipment Installed or Planned to be Installed for Air Emission Control for CAA <sup>B</sup>								
Plant Name & Unit #	SO2	Installation Date <sup>†</sup>	NOx (Combustion Controls)	Installation Date <sup>†</sup>	NOx (SCR/SNCR)	Installation Date <sup>†</sup>	Hg	Installation Date <sup>†</sup>
Beckjord 6 <sup>C</sup>								
Cardinal 1	FGD	Installed ('08)	Low NOx Burners	Installed ('98)	SCR	Installed ('03)	SCR/FGD <sup>E</sup>	Mar-15
Conesville 4	FGD	Installed ('09)	T-Fired Unit Simulated OFA / Concentric Firing System	Implemented / ('04)	SCR	Installed ('09)		
Conesville 5	FGD Upgrade	Installed ('06) <sup>D</sup>	T-Fired -No Change / OFA with upgrades	Installed ('04)			Gore <sup>F</sup>	Apr-16
Conesville 6	FGD Upgrade	Installed ('08) <sup>D</sup>	T-Fired -No Change / OFA with upgrades	Installed ('04)			Gore <sup>F</sup>	Jun-15
Gavin 1	FGD Upgrade	Post-2012	Low NOx Burners / CCV Burners	Installed ('98)	SCR	Installed ('01)	SCR/FGD <sup>E</sup>	01/96
Gavin 2	FGD Upgrade	Post-2012	Low NOx Burners / CCV Burners	Installed ('99)	SCR	Installed ('01)	SCR/FGD <sup>E</sup>	01/96
Kammer 1			Over Fire Air / upgrades	Installed ('99 / '03)				
Kammer 2			Over Fire Air / upgrades	Installed ('98 / '04)				
Kammer 3			Over Fire Air / upgrades	Installed ('99 / '03)				
Mitchell 1 <sup>G</sup>	FGD	Installed ('07)	Low NOx Burners / with water injection	Installed ('93 / '03)	SCR	Installed ('07)	SCR/FGD <sup>E</sup>	07/07
Mitchell 2 <sup>G</sup>	FGD	Installed ('07)	Low NOx Burners	Installed ('94)	SCR	Installed ('07)	SCR/FGD <sup>E</sup>	07/07
Muskingum R 1			Over Fire Air	Installed ('99)				
Muskingum R 2			Over Fire Air	Installed ('00)				
Muskingum R 3			Over Fire Air / upgrades	Installed ('99 / '03)				
Muskingum R 4			Over Fire Air / upgrades	Installed ('99 / '03)				
Muskingum R 5			Low NOx Burners	Installed ('93)	SCR	Installed ('05)		
Picway 5			Low NOx Burners	Installed ('95)				
Sporn 2			Low NOx Burners w/ Interjectory Air / upgrades	Installed ('97 / '04)				
Sporn 4			Low NOx Burners w/ Interjectory Air / upgrades	Installed ('97 / '04)	SNCR	Installed ('08)		
Stuart 1	FGD	Installed ('08)	Low NOx Burners	Installed	SCR	Installed ('04)		
Stuart 2	FGD	Installed ('08)	Low NOx Burners	Installed ('11)	SCR	Installed ('04)		
Stuart 3	FGD	Installed ('08)			SCR	Installed ('04)		
Stuart 4	FGD	Installed ('08)			SCR	Installed ('04)		
Zimmer	FGD	Installed ('91)	Low NOx Burners	Installed	SCR	Installed ('04)		

<sup>A</sup> Consistent with AEP Ohio's Commission-approved corporate separation plan, effective January 1, 2014, AEP Ohio transferred the generating units and associated assets identified herein to AEP Generation Resources (AEPGR).

<sup>B</sup> This Exhibit reflects installed or planned installations through 2020, as of March 2014.

<sup>C</sup> See Exhibit B.

<sup>D</sup> Upgrade existing FGD to meet 95% 30-day rolling average removal efficiency

<sup>E</sup> SCR/FGD co-benefit removal of mercury anticipated to meet requirements of the Mercury and Air Toxics Standards

<sup>F</sup> Gore mercury control system uses a proprietary material to capture gaseous mercury emissions

<sup>G</sup> Ownership of the Mitchell Plant was transferred to Kentucky Power Company (50%, January 1, 2014) and Wheeling Power Company (50%, January 31, 2015)

<sup>†</sup> In-service by end of year

# Exhibit B

## AEP Ohio Generating Unit Retirements

Estimated to be Retired by June 1, 2015

Plant	Location	Unit	MW
Kammer Plant	Moundsville, WV	1,2,3	630
Muskingum River	Beverly, OH	1,2,3,4,5	1425
Beckjord <sup>A</sup>	New Richmond, OH	6	53
Picway	Lockbourne, OH	5	100
Philip Sporn	New Haven, WV	2,4	300

<sup>A</sup> Plant operated by Duke Power Company. 53 MW represents Ohio Power's share of the unit capacity.

**This foregoing document was electronically filed with the Public Utilities**

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Summary: Correspondence -2015 Annual Environmental Control Plan electronically filed by Anne M Vogel on behalf of AEP Generation Resources