



Legal Department

American Electric Power
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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. 18-0690-EL-ECP

Dear Ms. McNeal:

Please find enclosed the 2018 Annual Environmental Control Plan (“ECP”) filed on behalf of AEP Generation Resources Inc. (“AEPGR”). AEPGR 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/Hector Garcia
Attorney for AEP Generation Resources Inc.

Attachments

AEP Generation Resources Inc. Environmental Control Plan

Introduction

AEP Generation Resources Inc. (“AEPGR”) is committed to protecting the environment while delivering safe, reliable electricity. AEPGR is an affiliate of American Electric Power Company (“AEP”). Between 2000 and 2017, AEP invested approximately \$8.6 billion in environmental controls, primarily related to the Clean Air Act, that have significantly reduced emissions. From 2001 through 2017, AEP reduced its mercury emissions by approximately 95 percent. From 1990 through 2017, AEP reduced its emissions of sulfur dioxide (SO₂) and nitrogen oxide (NO_x) by approximately 95 percent and 92 percent, respectively.

Current Conditions, Planned Activity and Goals

Exhibit A summarizes the installation status of SO₂, NO_x, and mercury control equipment at currently operating generating units owned by AEPGR as of March 2018. The control equipment listed represents existing and planned installations through 2025 that are currently required for compliance with the Clean Air Act (“CAA”), including the Clean Air Act Amendments of 1990 (“CAAA”), NO_x SIP Call, the Cross State Air Pollution Rule (“CSAPR”) the Mercury and Air Toxics Standards (“MATS”) Rule, as well as the New Source Review (“NSR”) Consent Decree.

In 2016, AEPGR sold the Gavin Plant, and in early 2017 AEP entered into an agreement with Dynegy to exchange ownership shares of the Zimmer and Conesville Plants, eliminating AEPGR’s ownership share of the Zimmer Plant. The Gavin and Zimmer Plants have been removed from this Plan as a result of those transactions. All retired generating units have also been removed.

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 buildings, and mobile fleet – across a range of reasonable scenarios. The transformation of our generation business is expected to reduce our reliance on coal and lignite from 68% of our generating capacity in 1999 to approximately 47% in 2017¹ AEP affiliates are heavily invested in renewable energy resources, and highly successful energy efficiency programs.

¹ Slide 39.

http://aep.com/investors/eventspresentationsandwebcasts/documents/MorganStanleyUtilitiesConfHandout_Feb_27_2018.pdf

While many of the actions described above are initiated at a broader level, the net results are achieved through AEP Generation Resources and the AEP operating companies in the form of emission reductions and increased operational experience in managing carbon emissions. These efforts will continue as federal regulation and/or legislation for carbon reduction progresses.

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Case No(s). 18-0690-EL-ECP

Summary: Application -Annual Environmental Control Plan under
Rule 4901:1-41-03(B), Ohio Administrative Code
electronically filed by Mr. Hector Garcia on behalf of AEP Generation Resources, Inc.