

American Electric Power Service Corp. would like to submit the following comments on behalf of those affiliates that will be filing responses to the FERC-580:

- In the FERC-580 proposed questions, some questions ask for information about each fuel supply contract. A contract is typically an agreement that lasts longer than a year. Consistent with FERC's position in the previous FERC 580 filing, AEP plans to report on contracts with a term greater than one year unless otherwise told by FERC. AEP also plans to report on contracts with a term greater than one year on questions that ask for information about "any contracts or agreements", such as question number 3.
- Proposed Question Number(s) 5a-c:
 - AEP's procurement policy information has been filed as confidential in previous state and jurisdictional filings and should not be made public. AEP is requesting that these responses be filed confidentially.
- Proposed Question Number 5d:
 - AEP's fuel inventory policy has been filed as confidential in previous state and jurisdictional filings and should not be made public. Making this information public would put AEP at a competitive disadvantage by allowing other utilities and counterparties to review AEP's confidential inventory policy. AEP determines inventory targets based on the probability of interruptions of the fuel supply, how long such interruptions may last, plant burn calculations, and how much fuel is necessary to provide for these contingencies. All of these factors are confidential and should remain confidential in order for AEP to conduct business competitively. AEP is requesting that this response be filed confidentially.
- Proposed Question Number 5f:
 - Plant-related environmental constraints are confidential and highly sensitive information. Making this information public would put AEP at a competitive disadvantage. Some of our plants are already limited as to what coal can be burned because of geographic location, transportation limitations, and other factors. If confidential plant specific environmental constraints were to be made public information, counterparties would have an advantage. AEP is strongly urging FERC to remove this question or at a minimum, this response be made confidential.
- Proposed Question(s) 5i-j:
 - Making this information public would put AEP at a disadvantage by allowing other companies to review confidential procedures. AEP is requesting that these responses be filed confidentially.
 - Question Number 5.i7 specifically asks for the respondent to "Illustrate in detail, the procurement procedures used on your most recent fuel procurement contract for ...". AEP is requesting that FERC clarify what is meant by "Illustrate" in this question.

- Proposed Question Number 6b:
 - One line in the instructions for the section that asks for “Fuel Cost” reads, “If the fuel is purchased on a delivered basis, then the FOB origin price should be left blank.” However, if the fuel is purchased FOB origin, there are no instructions saying that the FOB plant price should be left blank. If fuel bought FOB origin has to show both prices (an FOB origin price and an FOB plant price), then the difference between those two prices would be the cost of transportation. Transportation pricing information is treated confidentially. Even though specific vendor information is not provided, this information must remain confidential to keep AEP competitive in the marketplace, particularly due to the limited number of rail carriers who can transport coal to many of AEP’s plants. AEP would like FERC to clarify whether the information being requested here includes any transportation costs, or purely fuel costs. If all that is being requested is fuel costs, AEP understands that only one price should be provided, per contract, regardless of whether the fuel was purchased FOB origin or FOB plant, and AEP sees no problem filing this question as non-confidential. If both fuel costs and transportation costs are being requested, and the request for contracts that purchase fuel FOB origin will show an FOB origin price and a delivered price in the FOB plant box, then AEP requests filing this response as confidential to keep transportation costs confidential information.