

**Comparison Between Recent AEP Press Release (6/2011), Announcing
“Plan For Compliance With Proposed EPA Regulations,” and
Agreements Made With AEP In 2007 Consent Decreeⁱ**

Note: In addition to unit-specific requirements, the Consent Decree includes the following “catchall agreement”: “retireⁱⁱ, retrofitⁱⁱⁱ, or re-power^{iv} a total of 600 MW from Sporn Units 1-4, Clinch River Units 1-3, Tanners Creek Units 1-3, and or Kammer Units 1-3” by 12/31/ 2018.

AEP Facilities / Units (as listed in Press Release)	Actions Announced in Press Release	Action Agreed to by AEP in 2007 Consent Decree
<p>Glen Lyn Plant, Glen Lyn, Va.</p> <p>Unit in service dates: 1944, 1957</p>	<p>Permanently Retire (335 MW) by 12/31/14, 2014.</p>	<p>Units 5 & 6 (335 MW): Low NOx Burners by 12/13/07, Burn low-sulfur coal (sulfur content no greater than 1.75 lb/mmBTU on annual average basis) by 12/13/07.</p>
<p>Kammer Plant, Moundsville, W. Va.</p> <p>Unit in-service dates: 1958, 1958, 1959</p>	<p>Permanently Retire Units 1-3 (630 MW) by 12/31/14.</p>	<p>Units 1-3 (630 MW): Overfire Air by 12/13/07, Included on “catchall agreement” for retire, retrofit, and re-power by 12/31/18.</p>
<p>Kanawha River Plant, Glasgow, W. Va.</p> <p>Unit in-service dates: 1953, 1953</p>	<p>Permanently Retire (400 MW) by 12/31/14.</p>	<p>Units 1 & 2 (400 MW): Low NOx Burners by 12/13/07, Burn low-sulfur coal (sulfur content no greater than 1.75 lb/mmBTU on annual average basis) by 12/13/07.</p>

AEP Facilities / Units (as listed in Press Release)	Actions Announced in Press Release	Action Agreed to by AEP in 2007 Consent Decree
<p>Phillip Sporn Plant, New Haven, W.Va.</p> <p>Unit in-service dates: 1950, 1950, 1951, 1952, 1960</p>	<p>Permanently Retire (1,050 MW): 450 MW expected to retire in 2011, 600 MW retired by 12/31/14.</p> <p>*****</p> <p>Note: In 2010 Ohio Power Co. filed an application with the Public Utilities Commission for a 12/2010 closure on Unit 5.^v</p>	<p>Units 1-4 (600 MW): Included on “catchall agreement” for retire, retrofit, and re-power by 12/31/18; Unit 5 (450 MW): Retire, retrofit, re-power for by 12/31/15.</p>
<p>Picway Plant, Lockbourne, Oh.</p> <p>Unit in-service date: 1955</p>	<p>Permanently Retire Unit 9 (100 MW) by 12/31/14.</p>	<p>Unit 9 (100 MW): Low NOx Burners by 12/13/07.</p>
<p>Big Sandy Plant, Louisa, Ky.</p> <p>Unit in-service dates: 1963, 1969</p>	<p>Permanently Retire Units 1 & 2 (1,078)^{vi} by 12/31/14; Unit 1 rebuilt as (640 MW) natural gas plant by 12/31/15.</p>	<p>Unit 1 (260 MW): Low NOx Burners by 12/13/07, Burn low-sulfur coal (sulfur content no greater than 1.75 lb/mmBTU on annual average basis) by 12/13/07; Unit 2 (800 MW): SCR by 1/01/09, FGD by 12/31/15.</p>
<p>Clinch River Plant, Cleveland, Va.</p> <p>Unit in-service dates: 1958, 1958, 1961</p>	<p>Permanently Retire Unit 3 (235 MW) by 12/31/14; Units 1 & 2 (470 MW) refueled with natural gas (422 MW) by 12/31/14.</p>	<p>Units 1-3 (705 MW): Low NOx Burners, and Selective Non-Catalytic Reduction by 12/31/09, Included on “catchall agreement” for retire, retrofit, and re-power by 12/31/18.</p>

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<p>Conesville Plant, Conesville, Ohio</p> <p>Unit in-service dates: 1962, 1973, 1976, 1978</p>	<p>Permanently Retire Unit 3 (165 MW) by 12/31/12; Units 5 & 6 (800 MW)^{vii} would continue operating with retrofits.</p>	<p>Units 1-2 (250 MW): Retire, retrofit, or re-power by 12/13/07; Unit 3 (165 MW): Retire, retrofit, re-power by 12/31/12; Unit 4 (780 MW): SCR by 12/31/10, FGD 12/31/10; Units 5 & 6 (750 MW): Low NOx burners by 12/13/07, Upgrade existing FGD & meet a 95% 30-day Rolling Average Removal Efficiency by 12/31/09.</p>
<p>Muskingum River Plant, Beverly, Oh.</p> <p>Unit in-service dates: 1953, 1954, 1957, 1958, 1968</p>	<p>Permanently Retire Units 1-4 (840 MW) by 12/31/14; Unit 5 (600 MW) may be refueled with natural gas with capacity of (510 MW) by 12/31/14, depending on regulatory treatment in Ohio.</p>	<p>Units 1-4 (840 MW): Retire, retrofit, or re-power by 12/31/15; Unit 5 (585 MW): SCR by 1/01/08, FGD by 12/31/15.</p>

AEP Facilities / Units (as listed in Press Release)	Actions Announced in Press Release	Action Agreed to by AEP in 2007 Consent Decree
<p>Tanners Creek Plant, Lawrenceburg, Ind.</p> <p>Unit in-service dates: 1951, 1952, 1954, 1964</p>	<p>Permanently Retire Units 1-3, (495 MW) by 12/31/14; Unit 4 (500 MW) would continue to operate with retrofits.</p>	<p>Units 1-3 (495 MW): Low NOx Burners by 12/13/07; Burn low-sulfur coal (sulfur content no greater than 1.2 lb/mmBTU on annual average basis) by 12/13/07, Included on “catchall agreement” for retire, retrofit, and re-power by 12/31/18; Unit 4 (500 MW): Overfire Air by 12/13/07, Burn low-sulfur coal (sulfur content no greater than 1.2 % on annual average basis) by 12/13/07.</p>
<p>Welsh Plant, Pittsburg, Tx.</p> <p>Unit in-service dates: 1977, 1980, 1982</p>	<p>Permanently Retire Unit 2 (528 MW) by 12/31/14; Units 1-3 (1,056 MW) would continue to operate with retrofits</p>	<p>Not in CD</p>
<p>Northeastern Plant, Oologah, Ok.</p> <p>Unit in-service dates: 1979, 1980</p>	<p>Units 1-2 (935 MW) would be idle for a year or more while emission reduction equipment is installed; Both Units idled beginning 1/01/16. One unit would return to service by 12/31/16. The other Unit would return to service by 12/31/17.</p>	<p>Not in CD</p>

ⁱ In October 2007, the U.S. sued American Electric Power charging multiple violations of the Clean Air Act's New Source Reviews Program at AEP's Eastern System resulting in a Consent Decree. *See* Case 2:99-cv-01182-EAS-TPK Document 508 Filed 10/09/2007 ("Consent Decree").

ⁱⁱ "Retire" means that Defendant shall: (a) permanently shut down and cease to operate the Unit; and (b) comply with any state and/or federal requirements applicable to that Unit. Defendants shall amend any applicable permits so as to reflect the permanent shutdown status of such Unit. Consent Decree ¶ 55, Page 17 of 121.

ⁱⁱⁱ "Retrofit" means that the Unit must install and Continuously Operate both an SCR and an FGD. For the 600 MW [Sporn Units 1-4, Clinch River Units 1-3, Tanners Creek Units 1-3, and or Kammer Units 1-3], "Retrofit" means that the Unit must meet a federally-enforceable 30-Day Rolling Average Emission Rate of 0.100 lb/mmBTU for NO_x, and a 30-Day Rolling Average Emission Rate of 0.100 lb/mmBTU for SO₂, measured in accordance with the requirements of this Consent Decree. Consent Decree ¶ 56, Page 18 of 121.

^{iv} "Re-power" means either (1) the replacement of an existing pulverized coal boiler through construction of a new circulating fluidized bed ("CFB") boiler or other technology of equivalent environmental performance that a minimum achieves and maintains a 30-Day Rolling Average Emission Rate not greater than 0.100 lb/mmBTU or a 30-Day Rolling Average Removal Efficiency of at least ninety-five percent (95%) for SO₂ and a 30-Day Rolling Average Emissions Rate not greater than 0.070 lb/mmBTU for NO_x; or (2) the modification of such Unit, or removal and replacement of Unit components, such that the modified or replaced Unit generates electricity through the use of new combined cycle combustion turbine technology fueled by natural gas containing no more than 0.5 grains of sulfur per 100 standard cubic feet of natural gas, and at a minimum, achieves a 1-hour Average NO_x, Emission Rate not greater than 2.0 ppm. Consent Decree ¶ 54 Page 18 of 121.

^v According to submissions made to the State of Ohio, AEP planned to close this plant five months before EPA's March 2011 MACT proposal. Yet, AEP has included closing Units under "AEP's current plan for compliance with the EPA rules as proposed included permanently retiring the following coal-fueled power plants."

^{vi} There is a discrepancy between the MW data in the Consent Decree and the AEP Press Release. The Consent Decree has Big Sandy Plant Units 1 & 2 at 1,060 MW and the Press Release has Units 1 & 2 at 1,078, an 18 MW difference.

^{vii} The Consent Decree states that the Clinch River Units 5 & 6 total to 750 MW, a 10 MW difference from the AEP Press Release.