

Memo

To: West Virginia Coal Association, Inc. (“WVCA”)
From: Jacob C. Altmeyer, Esq.
Date: April 13, 2026
Re: ****UPDATE**** 2025 Integrated Resource Plans submitted by Appalachian Power Company, Wheeling Power Company, Monongahela Power Company and The Potomac Edison Company to the West Virginia Public Service Commission

This memorandum supplements our previous memorandum dated December 1, 2025, and addresses activity in the 2025 Integrated Resource Plans (hereinafter “IRP” or “IRPs”) filed by Appalachian Power Company and Wheeling Power Company (hereinafter collectively “APCO”), and Monongahela Power Company and The Potomac Edison Company (hereinafter collectively “Mon Power”) with the West Virginia Public Service Commission (hereinafter the “WVPSC”).

INTERVENING PARTIES

For both IRP matters, the parties that have intervened are:

1. The Consumer Advocate Division
2. The West Virginia Energy Users Group
3. Earthjustice
4. The West Virginia Coal Association, Inc.

DIRECT TESTIMONY

The only intervening party that filed direct testimony in either IRP matter was Earthjustice. Below is a summary of their testimony in each:

Mon Power

- Chelsea Hotaling, Senior Consultant at Energy Futures Group
- Also testified in 2023 & 2024 AEP ENEC cases and 2025 Mon Power ENEC case
- Summary:
 - Companies' forecast includes large load customer addition without any signed contract and they did not forecast any alternatives that do not include large load customer addition
 - Companies included an addition 5% load obligation in forecasting – above the PJM planning reserve margin
 - Next IRP should model additional scenarios for Ft. Martin & Harrison, including full gas conversion and early retirement – however she makes clear she is not recommending any early retirement or conversion, just that the additional option should have been modeled
 - Companies did not model energy efficiency program benefits
 - Companies' modeling put annual build limits on wind, solar and battery alternatives – they should have modeled higher annual limits
 - Modeling for high-load growth scenarios should have been done in conjunction with a higher natural gas price
 - Companies did not adequately consider the risks to ratepayers with the addition of a 1,200 MW NGCC plant
 - The Companies' next IRP should include input from stakeholders, particularly regarding what scenarios are modeled

- Catherine Kunkel, independent consultant with Kunkel Energy Research
- Also testified in 2025 AEP ENEC case and other older cases
- Summary:
 - The Companies projected shortfall is entirely dependent on the addition of a 243 MW data center and a 1012 MW data center – otherwise they are long on energy throughout the forecast period
 - The load additions are far too uncertain to justify a 1200 MW gas plant addition and present significant stranded costs risks to ratepayers
 - Forecasts likely underestimate potential cost risks in continued operation of plants

- Jim Grevatt, Managing Consultant for Energy Futures Group
- Also testified in 2021 First Energy ENEC case and other older cases
- Summary:
 - The Companies failed to include in their modeling “demand-side” resources – such as energy efficiency programs and demand response (pay customers to reduce use on peak days) programs
 - Companies have never pursued energy efficiency programs in WV despite having such programs in MD & PA

APCO

- Chelsea Hotaling, Senior Consultant at Energy Futures Group
- Also testified in 2023 & 2024 AEP ENEC cases and 2025 Mon Power ENEC case
- Summary:
 - Companies' cost assumptions for CC and CT alternative resources are too low
 - Companies' modeling put annual build limits on wind, solar and battery alternatives – they should have modeled higher annual limits
 - Companies included an additional 5% load obligation in forecasting – above the PJM planning reserve margin
 - Companies applied an unreasonable degradation factor to energy efficiency savings making those savings undervalued
 - Companies' Winter Peak Scenario only partially captured the effect a PJM seasonal construct would work and should perform additional modeling that include alternatives other than CC and CT options
 - The Companies' next IRP should include input from stakeholders, particularly regarding what scenarios are modeled, and should include an environmental impact input in their scenario modeling

- Catherine Kunkel, independent consultant with Kunkel Energy Research
- Also testified in 2025 AEP ENEC case and other older cases
- Summary:
 - Companies' forecast of costs to continue operating their plants failed to consider risks associated with coal unit aging and environmental compliance
 - Companies did not include indirect and allocated O&M costs in their forecast, explicitly limiting their estimate to direct costs. The Companies estimate over \$600 million in indirect costs and over \$770 million in allocated costs, through 2040
 - The Companies estimate only 2% increases annually in costs to operate the plants. However, if all three operate beyond 2040, each will be the oldest operating supercritical coal plants in the US (Amous 67-69 year, Mitchell 69 years, Mountaineer 60 years)
 - The only comparable is the Allen S. King plant in Minnesota that is scheduled to retire in 2028 at 70 years
 - Old plants often face increased outage rates and Companies failed to include that factor in their cost estimates
 - Companies did not include in their future cost estimates any alternative scenarios wherein the 2024 rules are eventually implemented

In addition, the Staff filed direct testimony in each matter. In the Mon Power case, they made no recommendation and said they will do so in the separately filed gas plant case. In the APCO case, they noted that PACO did not specifically select any scenario which they agreed with due to uncertainties. They recommend APCO be required to update their IRPS by 10/2027.

HEARING DATES

Mon Power

May 6 & 7, 2026

APCO

May 19 & 20, 2026