**Response by American Electric Power – Sub-critical coal report**

*Business & Human Rights Resource Centre invited American Electric Power to respond to its ranking in 14th place in* [*a report*](http://www.smithschool.ox.ac.uk/research-programmes/stranded-assets/Stranded%20Assets%20and%20Subcritcial%20Coal%20-%20The%20Risk%20to%20Investors%20and%20Companies%20-%20mid%20res.pdf) *by the Smith School of Enterprise and Environment (Oxford University) on energy-generation from subcritical coal. The report describes subcritical as “the least efficient and most polluting form of coal-fired generation.”*

*Specifically, we asked:*

* *What steps is your company taking to avoid harm to human rights (such as impacts on health, access to water and climate change) from operation of its sub-critical power stations?*
* *Does your company have a plan to reduce or eliminate emissions from sub-critical coal plants?*

*As well as 4 additional questions from the report authors, available on page 14 of the report.*

*Responses and non-responses by other companies ranked within the top 20* [*are here*](http://business-humanrights.org/en/sub-critical-coal-engaging-the-top-20-companies-on-climate-human-rights)*.*

**American Electric Power response, 30 March 2015**

Thank you for giving us the opportunity to respond to this report.  Without the complete set of data used to compile the rankings, it is a little bit difficult to confirm the data.  The ranking is presumably based on our 2012 generation statistics. The table lists 87.6 MM mWh which would be much higher than the mWh generated from our subcritical coal units that year – actually more than double the amount of electricity generated from those units. So, it appears that the data may be flawed.

Irrespective of that, in less than a year, we will have far less subcritical capacity due to planned retirements of coal-fueled generating units in 2015 and 2016. We will still have subcritical generating units at 5 plant sites, but using our forecasts for generation from our remaining subcritical units after the planned retirements, we project about 19 MM mWh to be generated annually from these units – 80 percent less than what the report currently states, which would place us way down on the list.

Our remaining subcritical generating units also are relatively newer units, constructed in the late 1970’s or early 1980’s, and will be equipped with advanced emission controls. Subcritical units can offer greater operational flexibility when compared with supercritical units and can be just as efficient as some supercritical units depending on operations and maintenance practices.  Therefore, it is unfair to categorize all subcritical units as more polluting than supercritical units, as some can be just as efficient and can have the same emission controls as supercritical units.

As a side note, AEP operates a diverse, highly efficient fleet of generating plants including the first and only ultra-supercritical generating unit built in the United States. That plant was completed in 2012, and we have no current plans to build any additional coal-fueled generation. AEP pioneered supercritical generating technology, building the first supercritical generating units in the United States in the 1950s. We also built the first extra-high voltage transmission lines in the United States in the 1950s. We have continued to focus on enhancing the efficiency of our generating fleet and of our transmission system to save fuel and reduce emissions.

AEP also has worked to advance technologies to reduce the environmental impact of coal-fueled generation. AEP built and validated the world’s first and carbon capture and storage project at an operating power plant at our Mountaineer Plant in West Virginia.

AEP is focused on diversification of its fuel mix for generation. Our generating fuel mix by capacity is 61 percent coal today. It will be 50 percent by capacity by 2020. AEP’s greenhouse gas emissions are 15 percent lower than in 2005 levels (145.1 million metric tons in 2005 – 122.7 in 2014) and will fall even more after we retire additional coal-fueled generation in the next two years.

Re: water usage: AEP has participated in the [Carbon Disclosure Project Water Survey](http://aepsustainability.com/fastfacts/CarbonDisclosureProject.aspx) for five years and provides extensive water data in our [Global Reporting Initiative](http://aepsustainability.com/fastfacts/gri.aspx) (GRI) report. AEP is one of 15 companies that have joined the Electric Power Research Institute and the [Southern Research Institute](http://www.southernresearch.org/) to establish a first-of-a-kind research facility to address power plants’ water usage and treatment. The [Water Research Center](http://www.georgiapower.com/docs/environment/WRC-Brochure.pdf) at Georgia Power Company’s Plant Bowen is focused on finding new ways to manage and treat wastewater and to reduce and conserve water used in the production of electricity.