

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF KENTUCKY	)	
POWER COMPANY FOR 1) A CERTIFICATE OF	)	
PUBLIC CONVENIENCE AND NECESSITY TO	)	
CONSTRUCT A MECHANICAL DRAFT COOLING	)	CASE NO.
TOWER AT THE MITCHELL PLANT 2)	)	2026-00001
APPROVAL OF CERTAIN REGULATORY AND	)	
ACCOUNTING TREATMENTS, AND 3) ALL	)	
OTHER REQUIRED APPROVALS AND RELIEF	)	

COMMISSION STAFF'S POST-HEARING REQUEST FOR INFORMATION
TO KENTUCKY POWER COMPANY

Kentucky Power Company (Kentucky Power), pursuant to 807 KAR 5:001, shall file with the Commission an electronic version of the following information. The information requested is due no later than July 28, 2026. The Commission directs Kentucky Power to the Commission's July 22, 2021 Order in Case No. 2020-00085¹ regarding filings with the Commission. Electronic documents shall be in portable document format (PDF), shall be searchable, and shall be appropriately bookmarked.

Each response shall include the question to which the response is made and shall include the name of the witness responsible for responding to the questions related to the information provided. Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association or a

¹ Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID-19* (Ky. PSC July 22, 2021), Order (in which the Commission ordered that for case filings made on and after March 16, 2020, filers are NOT required to file the original physical copies of the filings required by 807 KAR 5:001, Section 8).

governmental agency, be accompanied by a signed certification of the preparer or the person supervising the preparation of the response on behalf of the entity that the response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

Kentucky Power shall make timely amendment to any prior response if Kentucky Power obtains information that indicates the response was incorrect or incomplete when made or, though correct or complete when made, is now incorrect or incomplete in any material respect.

For any request to which Kentucky Power fails or refuses to furnish all or part of the requested information, Kentucky Power shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention shall be given to copied and scanned material to ensure that it is legible. When the requested information has been previously provided in this proceeding in the requested format, reference may be made to the specific location of that information in responding to this request. When applicable, the requested information shall be separately provided for total company operations and jurisdictional operations. When filing a paper containing personal information, Kentucky Power shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

1. Provide any documents from the Department of Energy (DOE) that discuss the \$51 million award, including but not limited to the email received on or around June 3, 2026, regarding the issuance of the award and any attachments thereto.

2. Provide a copy of the application, including any attachments, that was submitted and resulted in the \$51 million award from DOE, and any supplements thereto.

3. Provide any documents from the federal government that list or reference the DOE award and any terms or conditions of the award, including any contract or memorandum of understanding.

4. Explain why the application for the DOE award had to be limited to building the new mechanical draft cooling tower and could not have included the alternative options.

5. Describe how maintenance records for the Mitchell generating station are maintained and the years for which records are available.

6. Identify and describe any inspections, maintenance, or other due diligence that was completed, scheduled, or otherwise required to maintain, monitor, and/or determine the condition of the Unit 2 cooling tower since its construction, including but not limited to any inspections that were completed as part of the due diligence for Kentucky Power's purchase of a portion of Mitchell Plant.

7. Provide copies of any reports, logs, or other documentation of inspections or the condition of the Unit 2 cooling tower from its construction until 2016.

8. Explain the difference in the inspection schedules of Unit 1's cooling tower and Unit 2's cooling tower.

9. Identify the rate or rates that Kentucky Power uses to calculate Allowance for Funds Used During Construction (AFUDC), e.g. its short-term debt rate, its long-term debt rate, etc., including the order in which it applies those rates; explain why Kentucky Power uses that rate or rates to calculate AFUDC; and identify and explain any FERC

and generally accepted accounting standards that support the use of that rate or rates to calculate AFUDC.

10. Refer to the July 8, 2026 Hearing Video Transcript (HVT) at 11:14:15 AM through 11:18:50 AM. Refer also to Kentucky Power's April 10, 2026 response to Commission Staff's First Request for Information (Staff's First Request), Item 5(b), KPCO_R_KPSC_1_5_ConfidentialAttachment3.

a. Provide copies of the estimates for the approximately \$3 million full demolition cost included in Option 1, the approximately \$29 million partial demolition cost included in Option 3 and Option 4, and the approximately \$5 million full demolition.

b. Provide any correspondence with vendors regarding those estimated demolition costs.

c. If Kentucky Power contends that the estimates or correspondence were already provided as part of KPCO_R_KPSC_1_5_ConfidentialAttachment3, identify where each estimate and the relevant correspondence are included.

d. Explain the difference between the \$3 million and \$5 million full demolition costs.

11. Refer to the July 8, 2026 HVT at 11:24:30 AM through 11:26:31 AM.

a. Provide a copy of the bid or estimate solicitation for the initial project to repair the existing cooling tower discussed in the referenced testimony, any bids or estimates provided in response to that solicitation regardless of form, and any contracts that arose from that solicitation.

b. Identify the response from the contractor that did not meet specifications and explain why.

12. Refer to the July 8, 2026 HVT at 11:27:35 AM through 11:29:35 AM.

a. Provide any correspondence, memorandums or other documents that discuss the cost risks of Option 1 (completing the tower repairs) or the extent to which the original estimates should be escalated to estimate the costs going forward.

b. Explain the percentage that was used to escalate the cost of Option 1, and explain why and how that percentage and the resulting final cost was chosen and why.

c. Provide any correspondence with International Chimney Corporation regarding the estimated costs of Option 1.

d. If Kentucky Power contends that the correspondence were already provided as part of KPCO_R_KPSC_1_5_ConfidentialAttachment3, identify where the relevant correspondence are included.

13. Refer to the July 8, 2026 HVT at 11:35:00 AM through 11:37:00 AM. Refer also to the July 8, 2026 HVT at 11:38:15 AM through 11:40:00 AM.

a. Provide any bids or memorandums from International Chimney Corporation relating to the estimates or scopes of work for Option 1 and Option 4 provided after it was determined that the cost or scope of the initial project would be more than anticipated.

b. Provide any estimate, bid, or memorandum from International Chimney Corporation that projects the period in which Unit 2 would have to be offline for Option 4, and identify those portions of the documents provided that include that projection.

14. State the expected outage time for Option 1, if any, and provide any relevant estimate or memorandums that contain that information.

15. Refer to Malone Direct Testimony, Confidential Exhibit SPM-1, Appendix B. Refer also to Kentucky Power's April 10, 2026 response to Staff's First Request, Item 5(b), KPCO_R_KPSC_1_5_ConfidentialAttachment3 at page 448.

a. Explain each change between the estimate included in Appendix B to Confidential Exhibit SPM-1 and Confidential Attachment 3 at page 448 that resulted in any differences to the relevant estimates;

b. Explain why each of those changes were made and who initiated the changes e.g. Worley, Kentucky Power, etc.; and

c. Provide any correspondence discussing changes to the estimate from when Confidential Attachment 3 at page 448 was first provided to Kentucky Power or an affiliate to when Appendix B was first provided to Kentucky Power or an affiliate.

16. Refer to the Malone Direct Testimony, Confidential Exhibit SPM-1, Appendix B.

a. Provide an itemized breakdown of all capital costs for Option 3 not included in the Total Installed Cost reflected in Confidential Exhibit SPM-1, Appendix B.

b. For each category of cost listed in Confidential Exhibit SPM-1, Appendix B as not being included in the Total Installed Cost, explain where it fits in the itemized breakdown provided in response to subpart (a) and identify any other costs included in each component of the itemized breakdown not listed in Appendix B.

17. Explain whether Kentucky Power would receive any partial capacity credit towards its PJM Interconnection, LLC (PJM) annual capacity requirements for the

capacity from Unit 2 in the planning year in which Unit 2 would require to be offline for a portion of a year as expected in the event Option 4 is selected, and explain the basis for your response with reference to the relevant PJM business practice manuals, policies, and other written requirements.

18. Provide and explain the expected construction timeline for an approximately 450 MW simple cycle combustion turbine natural gas fired unit.



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DATED JUL 14 2026

cc: Parties of Record

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