

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

AN ELECTRONIC EXAMINATION OF THE)	
APPLICATION OF THE FUEL ADJUSTMENT)	CASE NO.
CLAUSE OF KENTUCKY POWER COMPANY)	2025-00338
FROM NOVEMBER 1, 2022 THROUGH)	
OCTOBER 31, 2024.)	

COMMISSION STAFF'S THIRD 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 on March 20, 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 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

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).

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. Regarding the repeal of the "Endangerment Finding" in Section 202(a) of the Clean Air Act:

a. Explain how its repeal affects Kentucky Power's current and future planning in its environmental compliance strategy.

b. Explain how its repeal affects Kentucky Power's current and future operations of its existing facilities.

c. Explain whether its repeal affects Kentucky Power's current and future planning as it relates to controls for any pollutant limitations listed in the National Ambient Air Quality Standards (NAAQS).

d. If not discussed above, explain whether Kentucky Power is aware of any pending relaxation of environmental control standards that may affect its current level of compliance related to fossil fuel generation.

2. Refer to Kentucky Power's response to Commission Staff's Second Request for Information (Staff's Second Request), Item 2.

a. Once a forward fixed price physical fuel purchase (hedge) has been made, say at the 36-month milestone, explain whether this hedge is always retained until the anticipated use date(s). If not, explain how hedges are managed between the time of purchase and the anticipated use date(s).

b. Purchasing the coal hedge appears to be different than Kentucky Power's coal purchases obtained through its usual bid solicitation process. If so, explain whether the coal purchase hedge is in addition to coal purchased through Kentucky Power's normal coal solicitation / procurement process.

3. Refer to Kentucky Power's response to Staff's Second Request, Item 3 attachment 03_KPCO_R_AG_1_2_Attachment1.xlsx. For the period November 22, 2023-December 4, 2023, it is not clear what the daily Operating Balancing Account (OBA) value is and what volumes Kentucky Power was required to sell to keep the OBA within Columbia Gas Transmission limits. Provide a more detailed explanation.

4. Refer to Kentucky Power's response to Staff's Second Request, Item 7. For each of the actions taken to mitigate high inventory levels. For 2023 and 2024, explain

and provide, for each contract modified or amended by Kentucky Power, as referenced in Kentucky Power's Response to Staff's Second Request, Item 7 the following: the amount of coal that was originally scheduled to be delivered; the amount deferred to what later date; the amount canceled; and cost to Kentucky Power for the contract modification or amendment.

5. For the years 2023 and 2024, and for each action, explain whether Kentucky Power incurred any additional transportation charges or credits as a result of each of its coal contract modifications or amendments referenced in Kentucky Power's response to Staff's Second Request, Item 7.

6. If yes, explain how Kentucky Power recovers the cost for each of the contract modifications or amendments referenced in Kentucky Power's response to Staff's Second Request, Item 7.

7. Refer to Kentucky Power's response to Staff's Second Request, Item 10. Explain what is meant by "given the timing of the cities' request for quotes in April 2022 to replace the expiring contracts" as it relates to not submitting a new proposal for wholesale power contracts with Olive Hill and the city of Vanceburg after each of their respective contracts expired in May of 2025.



Linda C. Bridwell, PE
Executive Director
Public Service Commission
211 Sower Blvd.
Frankfort, KY 40601-8294

DATED **MAR 05 2026**

cc: Parties of Record

*Angela M Goad
Assistant Attorney General
Office of the Attorney General Office of Rate
700 Capitol Avenue
Suite 20
Frankfort, KY 40601-8204

*Lawrence W Cook
Assistant Attorney General
Office of the Attorney General Office of Rate
700 Capitol Avenue
Suite 20
Frankfort, KY 40601-8204

*Harlee P. Havens
Stites & Harbison
250 West Main Street, Suite 2300
Lexington, KY 40507

*Michael West
Office of the Attorney General Office of Rate
700 Capitol Avenue
Suite 20
Frankfort, KY 40601-8204

*Jody Kyler Cohn
Boehm, Kurtz & Lowry
425 Walnut Street
Suite 2400
Cincinnati, OH 45202

*Michael J. Schuler
American Electric Power Service Corporation
1 Riverside Plaza, 29th Floor
Post Office Box 16631
Columbus, OH 43216

*John Horne
Office of the Attorney General Office of Rate
700 Capitol Avenue
Suite 20
Frankfort, KY 40601-8204

*Honorable Michael L Kurtz
Attorney at Law
Boehm, Kurtz & Lowry
425 Walnut Street
Suite 2400
Cincinnati, OH 45202

*Kentucky Power Company
1645 Winchester Avenue
Ashland, KY 41101

*Toland Lacy
Office of the Attorney General
700 Capital Avenue
Frankfort, KY 40601

*Kenneth J Gish, Jr.
Stites & Harbison
250 West Main Street, Suite 2300
Lexington, KY 40507

*Katie M Glass
Stites & Harbison
421 West Main Street
P. O. Box 634
Frankfort, KY 40602-0634