

EXHIBIT RCS-29

**KPSC Case No. 2014-00396 General Rate Adjustment  
Attorney General's Initial Set of Data Requests  
Dated January 29, 2015  
Item No. 20  
Page 1 of 1**

**Kentucky Power Company**

**REQUEST**

Reference the Mitchell Plant Maintenance Normalization, Adjustment W34 of Section V, Exhibit 2. Please provide the following:

- a. A detailed list of all Mitchell maintenance activities, the associated costs, and the expected frequency of the maintenance activity for 2012, 2013, and 2014.
- b. A detailed list of all major scheduled maintenance activities and expected frequency of these maintenance activities.
- c. Maintenance activity costs for 2010 and 2011.
- d. Justification for a 3-year average.

**RESPONSE**

- a. – c. Please see AG\_1\_20\_Attachment1.xls for this response.
- d. Maintenance activities vary annually primarily due to scheduled outages for each of the two Mitchell units. Typically, one unit will have an outage over a given three year period, so two years will have scheduled outages and a third year will have no scheduled outages. Also, forced outages have to be addressed and will contribute to additional costs. Looking at cost over a three year period for a given plant provides a better indicator of what production costs should be. Three year averaging has been used in prior rate cases for the Big Sandy plant to better align revenues with costs.

**WITNESS:** J D LaFleur/R K Wohnhas

Plant O&M Account Type	Mitchell Plant Steam Maintenance	Activities	Test Years		T2011		T2012		T2013		T2014		Total Sum of ML 50%	Total Count of WO
			Freq (Wks)	Sum of ML 50%	Count of WO	Sum of ML 50%	Count of WO	Sum of ML 50%	Count of WO	Sum of ML 50%	Count of WO			
Ash, Wastewater, Landfills	As Required	Ash, Wastewater, Landfills	13	\$356,767	390	\$320,804	\$166,949	355	\$352,570	\$436,369	259	\$1,633,458	1711	
			1	\$77,301	171	\$136,847	215	\$158,271	173	\$136,496	\$136,496	228	\$634,107	986
			2	\$434,069	561	\$457,651	614	\$510,840	507	\$572,865	\$572,865	487	\$2,267,565	2697
			4	\$476,531	27	\$314,922	50	\$134,356	24	\$35,902	\$114,349	17	\$1,076,060	164
			8	\$181,037	122	\$89,499	173	\$93,985	103	\$16,670	\$191,915	121	\$25,532	13
			13	\$32,323	9	\$343,953	43	\$29,508	15	\$365,410	\$231,816	17	\$1,003,009	643
			26	\$127,836	71	\$224,208	97	\$137,453	87	\$63,732	\$48,878	79	\$602,106	397
			52	\$258,822	189	\$749,522	358	\$1,693,654	507	\$2,718,454	\$1,010,543	424	\$6,430,996	2030
			As Required	\$876,790	390	\$1,766,701	491	\$907,425	425	\$1,365,279	\$314,110	278	\$5,230,425	1980
			As Required	\$1,953,340	808	\$3,797,383	1215	\$2,996,785	1162	\$4,699,719	\$1,911,611	920	\$15,358,837	5349
			1	\$60,167	197	\$189,017	286	\$109,967	277	\$114,961	\$77,268	304	\$551,379	1317
			2	\$8,236	11	\$7,514	9	(\$4,409)	6	\$3,522	\$7,421	9	\$22,284	41
			4	\$149,208	261	\$209,225	241	\$121,843	212	\$179,834	\$208,623	281	\$868,733	1213
13	\$6,794	14	\$2,282	9	\$2,589	14	\$3,415	\$1	1	\$15,081	49			
As Required	\$224,405	483	\$408,038	545	\$229,989	509	\$301,731	\$293,313	595	\$1,457,477	2620			
1	\$238	3	\$238	3	\$238	3	\$238	\$238	3	\$238	3			
4	\$6,585	7	\$6,585	7	\$6,585	7	\$6,585	\$6,585	7	\$6,585	7			
8	\$1,572	2	\$1,572	2	\$1,572	2	\$1,572	\$1,572	2	\$1,572	2			
26	\$35,769	27	\$62,280	34	\$12,938	19	\$12,197	\$3,260	17	\$126,445	117			
As Required	\$44,164	39	\$62,280	34	\$12,938	19	\$14,186	\$3,260	17	\$136,828	136			
4	\$29,468	59	\$93,194	89	\$96,153	74	\$43,074	\$105,047	52	\$366,936	320			
As Required	\$29,468	59	\$93,194	89	\$96,153	74	\$43,074	\$105,047	52	\$366,936	320			
4	\$14,950	47	\$11,835	46	\$15,417	42	\$16,460	\$18,978	36	\$77,641	207			
26	\$155,664	129	\$134,644	112	\$60,085	72	\$58,020	\$36,407	72	\$444,819	447			
52	\$101,872	107	\$77,373	71	\$21,255	51	\$31,004	\$10,646	30	\$242,150	291			
As Required	\$34,297	93	\$63,698	83	\$24,527	59	\$51,255	\$345,453	97	\$519,230	407			
As Required	\$306,783	376	\$287,550	312	\$121,284	224	\$156,739	\$411,485	235	\$1,283,841	1352			
1	\$337,147	288	\$281,458	246	\$240,451	275	\$235,126	\$873	3	\$873	3			
4	\$9,163	4	\$9,163	4	(\$8,857)	2	\$3,707	\$351,785	204	\$1,345,967	1153			
13	\$78,213	15	\$33,642	65	\$24,967	52	\$29,935	\$4,595	10	\$8,609	20			
26	\$21,195	42	\$33,642	65	\$24,967	52	\$29,935	\$337,370	72	\$78,213	15			
52	\$195,147	355	\$248,392	315	\$354,080	455	\$295,338	\$278,686	314	\$447,109	296			
As Required	\$453,489	685	\$650,868	645	\$60,642	784	\$564,106	\$973,309	603	\$1,371,643	1731			
1	\$50,636	64	\$319	2	\$65,289	20	\$46,357	\$96,311	33	\$208,276	73			
8	\$5,934	1	\$266,538	129	\$43,069	127	\$685,703	\$239,198	178	\$1,285,145	730			
13	\$25,972	9	\$25,972	9	\$25,972	9	\$25,972	\$7,013	27	\$40,242	52			
26	\$29,245	66	\$26,921	66	\$26,638	54	\$10,455	\$5,037	15	\$1,141,884	96			
52	\$114,565	87	\$58,509	55	\$54,634	62	\$36,257	\$2,396	11	\$2,964	15			
104	\$1,429,388	211	\$452,850	260	\$795,435	431	\$1,144,782	\$19,439	40	\$112,698	258			
As Required	\$1,629,769	429	\$831,108	521	\$1,010,775	718	\$5,392	\$48,896	109	\$312,861	390			
1	\$1,148,094	712	\$704,499	709	\$319,939	707	\$371,008	\$738,377	884	\$4,560,832	2442			
4	\$26,819	31	\$45,204	45	\$40,889	26	\$52,467	\$198,087	94	\$7,664,902	4056			
8	\$101,052	88	\$44,365	73	\$31,184	32	\$258,164	\$6,123	6	\$28,571	23			
26	\$1,898	3	\$303	4	\$327	4	\$327	\$649	5	\$3,177	13			
52	\$447,979	196	\$357,687	78	\$44,397	43	\$113,678	\$217,012	33	\$1,180,753	383			
As Required	\$1,832,253	1072	\$1,194,423	923	\$880,003	875	\$929,158	\$108,054	53	\$811,488	202			
1	\$15,586	68	\$127,134	80	\$4,685	4	\$4,685	\$830,660	912	\$5,666,498	4611			
4	\$23,952	16	\$23,952	16	\$23,952	16	\$23,952	\$29,176	92	\$5,221	47			
26	\$15,586	68	\$127,134	80	\$4,685	4	\$4,685	\$525,780	3	\$525,780	487			
52	\$23,952	16	\$23,952	16	\$23,952	16	\$23,952	\$24,279	3	\$24,279	3			
As Required	\$15,586	68	\$127,134	80	\$4,685	4	\$4,685	\$1,059	4	\$82,979	63			
13	\$29,880	82	\$52,184	102	\$31,050	110	\$99,513	\$1,059	4	\$8,268	4			
As Required	\$29,880	82	\$52,184	102	\$31,050	110	\$99,513	\$54,514	99	\$646,526	564			
1	\$2,223,784	319	\$3,256,710	359	\$3,206,640	299	\$2,604,790	\$80,010	86	\$284,659	483			
4	\$37,195	93	\$107,898	111	\$132,541	101	\$37,067	\$2,131,650	257	\$13,423,574	1529			
13	\$4,990	14	\$57,114	38	\$124,757	34	\$49,064	\$54,016	42	\$289,941	168			
26	\$53,256	93	\$123,434	98	\$161,565	122	\$159,538	\$136,133	147	\$633,926	606			

Plant O&M Account Type	Mitchell Plant Steam Maintenance	Activities	Test Years		T2011		T2012		T2013		T2014		Total Sum of ML 50%	Total Count of WO
			Freq (Wks) As Required	Sum of ML 50%	Count of WO	Sum of ML 50%	Count of WO	Sum of ML 50%	Count of WO	Sum of ML 50%	Count of WO			
		<b>Other Equipment Total</b>												
		Piping	26	\$90,247	91	\$135,282	109	\$224,096	172	\$93,892	121	\$134,153	\$677,671	599
		Precipitators	1	\$1,824	3	\$3,714	6	\$3,714	6	\$10,271	5	\$10,271	\$15,809	14
			4	\$243,685	334	\$471,243	303	\$889,662	284	\$628,951	216	\$235,616	\$2,469,157	1400
			8	\$16,477	14	\$24,850	11	\$24,850	11	\$49,012	19	\$732	\$41,326	25
			13		2	\$37,838	9	\$157,707	14	\$874	1		\$242,678	45
			26										\$874	1
			52										\$8,289	7
		<b>Precipitators Total</b>	As Required	\$1,116	1	\$1,116	7	\$8,289	7	\$65,055	10	\$292	\$2,946,546	21
		Pulverizers	52	\$260,492	354	\$1,161,614	323	\$1,161,614	321	\$754,162	251	\$236,348	\$2,946,546	1513
				\$128,628	246	\$102,436	193	\$73,361	243	\$54,354	147	\$54,896	\$413,674	1025
		<b>Pulverizers Total</b>	As Required	\$128,628	246	\$102,436	193	\$73,361	243	\$54,354	147	\$54,896	\$413,674	1025
		Pumps & Valves	687	\$612,740	687	\$776,090	819	\$815,464	868	\$688,578	636	\$881,457	\$3,774,329	3899
			4	\$159,117	249	\$88,433	171	\$96,147	203	\$206,728	254	\$141,379	\$3,774,329	3899
		<b>Pumps &amp; Valves Total</b>	As Required	\$159,117	249	\$88,433	171	\$96,147	203	\$206,728	254	\$141,379	\$3,774,329	3899
		Safety Systems	8										\$691,804	1117
			52	\$468	3	\$2,341	7	\$3,323	13	\$270	2	\$270	\$352	4
		<b>Safety Systems Total</b>	As Required	\$468	3	\$2,341	7	\$3,323	13	\$270	2	\$270	\$645	24
		SCR	1	\$7,773	3	\$90,773	178	\$100,093	222	\$206,728	254	\$141,671	\$698,841	1147
			4	\$683	1	\$1,002	19	\$24,889	47	\$62,388	129	\$39,128	\$143,888	285
			13										\$8,994	16
			26										\$210	4
			52										\$517	2
		<b>SCR Total</b>	As Required	\$159,575	252	\$90,773	178	\$100,093	222	\$206,728	254	\$141,671	\$698,841	1147
		Steam, Condensers, Feedwater	4	\$50,082	13	\$43,957	6	\$29,388	15	\$29,388	8	\$29,664	\$58,939	21
			As Required	\$94,040	28	\$13,325	6	\$38,245	23	\$39,128	89	\$7,795	\$143,888	285
			1	\$111,328	224	\$166,006	211	\$116,627	147	\$246,540	166	\$159,634	\$800,135	874
			4										\$129	2
			8	\$243,058	245	\$270,095	268	\$266,683	241	\$249,502	191	\$263,947	\$1,293,284	1180
			13										\$2,105	23
			As Required	\$100,014	173	\$55,700	113	\$80,453	175	\$83,657	98	\$100,711	\$420,534	765
		<b>Structures Total</b>	As Required	\$454,400	642	\$492,256	598	\$464,944	576	\$580,295	461	\$524,291	\$2,516,187	2844
		Tools	4	\$58,656	65	\$94,433	97	\$93,854	54	\$73,414	58	\$78,239	\$398,596	317
		<b>Tools Total</b>	As Required	\$58,656	65	\$94,433	97	\$93,854	54	\$73,414	58	\$78,239	\$398,596	317
		Turbine	1	\$3,681	3	\$26,061	26	\$32,384	51	\$35,811	22	\$35,811	\$97,937	102
			2										\$4,162	6
			4	\$157,083	123	\$506,866	226	\$748,496	290	\$750,256	284	\$822,060	\$2,984,772	1149
			13										\$161	2
			26										\$351,945	183
			52										\$437,657	80
		<b>Turbine Total</b>	As Required	\$52,595	44	\$231,883	102	\$486,026	170	\$494,928	137	\$56,431	\$1,321,863	486
			As Required	\$213,369	170	\$829,510	402	\$1,622,469	639	\$1,654,658	538	\$878,491	\$5,198,498	2008
		<b>Grand Total</b>		\$11,610,050	8096	\$14,971,539	8809	\$15,661,915	9239	\$18,939,795	8799	\$12,474,790	\$73,658,089	44235

- NOTES:
- 2010-2013 actuals from post-allocated OPCo books from maintenance accounts 510-514 at 50%.
  - 2014 actuals from post-allocated KPCCo books from maintenance accounts 510-514 at 100% of KPCCo Mitchell costs.
  - All amounts represent KPCCo's or 50% of Mitchell maintenance costs.
  - Frequency per prescribed preventative maintenance scheme set up for specific equipment in the plant.
  - Count based upon number of work orders charged by month and shown as "Count of WO."
  - Non-plant costs are allocated to plant and included for test years T2012-T2014.
  - Test year is 12 months ending September of that year. T2014 is the period 10/1/13 thru 09/30/14.