# Kentucky Power Company KPSC Case No. 2023-00008 Commission Staff's Second Set of Post-Hearing Data Requests Dated April 8, 2024

# **DATA REQUEST**

KPSC PHDR 2\_3 Starting from the date Kentucky Power acquired its share of the Mitchell station through the end of the current review period, for each calendar year, provide the number of hours Mitchell Unit 1 was in a forced outage, maintenance outage, planned outage, reserve shutdown, and actual operation transmitting energy.

### RESPONSE

The Company objects to this request on the grounds that it is overbroad, unduly burdensome, and is not reasonably calculated to lead to the discovery of admissible evidence in connection with the two-year period under review as it seeks information concerning the operation of the Mitchell Plant Unit 1 for a prior period outside of the review period in the present case and for which the application of the Company's fuel adjustment clause has already been adjudicated by the Commission. The Company further objects to the extent the term "actual operation transmitting energy" is undefined, vague, susceptible to be misinterpreted or given multiple meanings, and therefore ambiguous and unintelligible. The Company construes the term to mean those periods when the unit was "Generating" as identified in the PJM GADS, meaning that it was operating and connected to the PJM transmission system regardless of level of output.

Without waiving these objections, the Company states as follows:

Period	Total Hours in Period	Forced Outage Hours	Maintenance Outage Hours	Planned Outage Hours	Reserve Shutdown Hours	Generating Hours
Nov-Dec 2020	1,464.00	-	229.50	596.63	370.70	267.17
2021	8,760.00	2,575.31	951.24	1,382.52	477.39	3,373.54
Jan-Oct 2022	7,296.00	350.51	464.57	576.00	853.39	5,051.53

# June 19, 2024 Supplemental Response

Pursuant to the Commission's June 5, 2024 Order overruling Kentucky Power Company's objections, the Company states:

Period	Total Hours in Period	Forced Outage Hours	Maintenance Outage Hours	Planned Outage Hours	Reserve Shutdown Hours	Generating Hours
2015	8,760.00	617.81	602.81	2,419.18	338.91	4,781.29
2016	8,784.00	640.72	1,756.61	-	445.69	5,940.98
2017	8,760.00	1,746.51	306.61	902.73	56.01	5,748.14
2018	8,760.00	1,088.83	681.15	1,402.65	409.74	5,177.63
2019	8,760.00	590.20	906.88	2,254.45	491.59	4,516.88
2020	8,784.00	733.55	1,556.09	1,289.02	1,292.71	3,912.63
2021	8,760.00	2,575.31	951.24	1,382.52	477.39	3,373.54
Jan-Oct 2022	7,296.00	350.51	464.57	576.00	853.39	5,051.53

Witness: Timothy C. Kerns

# Kentucky Power Company KPSC Case No. 2023-00008 Commission Staff's Second Set of Post-Hearing Data Requests Dated April 8, 2024

### **DATA REQUEST**

KPSC PHDR 2 4 Starting from the date Kentucky Power acquired its share of the Mitchell station through the end of the current review period, for each calendar year, provide the number of hours Mitchell Unit 2 was in a forced outage, maintenance outage, planned outage, reserve shutdown, and actual operation transmitting energy.

### **RESPONSE**

The Company objects to this request on the grounds that it is overbroad, unduly burdensome, and is not reasonably calculated to lead to the discovery of admissible evidence in connection with the two-year period under review as it seeks information concerning the operation of the Mitchell Plant Unit 2 for a prior period outside of the review period in the present case and for which the application of the Company's fuel adjustment clause has already been adjudicated by the Commission. The Company further objects to the extent the term "actual operation transmitting energy" is undefined, vague, susceptible to be misinterpreted or given multiple meanings, and therefore ambiguous and unintelligible. The Company construes the term to mean those periods when the unit was "Generating" as identified in the PJM GADS meaning that it was operating and connected to the PJM transmission system regardless of level of output.

Without waiving these objections, the Company states as follows:

Period	Total Hours in Period	Forced Outage Hours	Maintenance Outage Hours	Planned Outage Hours	Reserve Shutdown Hours	Generating Hours
Nov-Dec 2020	1,464.00	1	-	-	236.50	1,227.50
2021	8,760.00	390.82	991.73	1,220.60	597.68	5,559.17
Jan-Oct 2022	7,296.00	20.85	1,461.79	154.00	1,653.07	4,006.29

# June 19, 2024 Supplemental Response

Pursuant to the Commission's June 5, 2024 Order overruling Kentucky Power Company's objections, the Company states:

Period	Total Hours in Period	Forced Outage Hours	Maintenance Outage Hours	Planned Outage Hours	Reserve Shutdown Hours	Generating Hours
2015	8,760.00	576.72	1,184.28	2,398.98	385.35	4,214.67
2016	8,784.00	762.66	1,095.57	575.47	108.05	6,242.25
2017	8,760.00	44.32	908.02	-	77.68	7,729.98
2018	8,760.00	223.43	1,065.45	1,472.75	664.77	5,333.60
2019	8,760.00	141.15	1,411.97	1,290.15	1,150.14	4,766.59
2020	8,784.00	497.95	1,118.64	445.10	2,186.05	4,536.26
2021	8,760.00	390.82	991.73	1,220.60	597.68	5,559.17
Jan-Oct 2022	7,296.00	20.85	1,461.79	154.00	1,653.07	4,006.29

Witness: Timothy C. Kerns

### **VERIFICATION**

The undersigned, Timothy C. Kerns, being duly sworn, deposes and says he is the Senior Vice President of Fossil Hydro Generating Assets for American Electric Power Service Corporation, that he has personal knowledge of the matters set forth in the foregoing responses and the information contained therein is true and correct to the best of his information, knowledge, and belief

		Timothy C. Kerns
Commonwealth of Kentucky	)	Con No. 2022 00009
County of Boyd	)	Case No. 2023-00008

Subscribed and sworn to before me, a Notary Public in and before said County and

State, by Timothy C. Kerns, on Jime 13,2024

Marily Michelle Caldwell

My Commission Expires May 5,2027

Notary ID Number KYNP 71841

MARILYN MICHELLE CALDWELL
Notary Public
Commonwealth of Kentucky
Commission Number KYNP71841
My Commission Expires May 5, 2027