

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	-	-	-	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

