

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF KENTUCKY	)	
POWER COMPANY FOR APPROVAL OF (1) A	)	
CERTIFICATE OF PUBLIC CONVENIENCE	)	Case No. 2025-00175
AND NECESSITY TO MAKE THE CAPITAL	)	
INVESTMENTS NECESSARY TO CONTINUE	)	
TAKING CAPACITY AND ENERGY FROM	)	
THE MITCHELL GENERATING STATION	)	
AFTER DECEMBER 31, 2028, (2) AN	)	
AMENDED ENVIRONMENTAL COMPLIANCE	)	
PLAN, (3) REVISED ENVIRONMENTAL	)	
SURCHARGE TARIFF SHEETS, AND (4) ALL	)	
OTHER REQUIRED APPROVALS AND	)	
RELIEF	)	

**SIERRA CLUB’S SUPPLEMENTAL REQUESTS FOR INFORMATION TO
KENTUCKY POWER COMPANY**

Sierra Club hereby submits this Supplemental Requests for Information to Kentucky Power Company (“the Company”). Please provide responses to these data requests below to the undersigned counsel.

GENERAL INSTRUCTIONS

1) Definitions: For the purposes of these data requests, the following definitions shall apply:

- a) The terms “Kentucky Power Company,” “Kentucky Power,” or “the Company” means and include any and all affiliates and/or subsidiaries, successors, predecessors, agents, consultants, and witnesses in this proceeding, and any and all of their affiliates, subsidiaries, or predecessors.
- b) The term “Company” means Kentucky Power Company and any and all affiliates and/or subsidiaries, successors, predecessors, agents, consultants, and witnesses in this proceeding, and any and all of their affiliates, subsidiaries, or predecessors.

- c) “Document” means all written, recorded or graphic matters, however produced or reproduced, pertaining in any manner to the subject of this proceeding, whether or not now in existence, without limiting the generality of the foregoing, all originals, copies and drafts of all writings, correspondence, telegrams, notes or sound recordings of any type of personal or telephone communication, or of meetings or conferences, minutes of directors or committee meetings, memoranda, inter-office communications, studies, analyses, reports, results of investigations, reviews, contracts, agreements, working papers, statistical records, ledgers, books of account, vouchers, bank checks, x-ray prints, photographs, films, videotapes, invoices, receipts, computer printouts or other products of computers, computer files, stenographer’s notebooks, desk calendars, appointment books, diaries, or other papers or objects similar to any of the foregoing, however denominated. If a document has been prepared in several copies, or additional copies have been made, and the copies are not identical (or which, by reasons of subsequent modification of a copy by the addition of notations, or other modifications, are no longer identical) each non-identical copy is a separate “document.”
- d) “And” or “or” shall be construed conjunctively or disjunctively as necessary to make the requests inclusive rather than exclusive.
- e) The terms “you” and “your” refer to “Kentucky Power Company.”
- f) The term “person” means any natural person, corporation, corporate division, partnership, limited liability company, other unincorporated association, trust, government agency, or entity.
- g) The term “regarding” means consisting of, containing, mentioning, suggesting, reflecting, concerning, regarding, summarizing, analyzing, discussing, involving, dealing with, emanating from, directed at, pertaining to in any way, or in any way logically or factually connected or associated with the matter discussed.
- h) The singular as used herein shall include the plural and the masculine gender shall include the feminine and the neuter.
- i) “Identify” or “identifying” or “identification” when used in reference to a person that is a natural person means to state: the full name of the person and any names under which he conducts business; the current employer of the person, the person’s job title and classification, the present or last known work address of the person; and, the present or last known telephone number of the person.
- j) “Identify” or “identifying” or “identification” when used in reference to a person other than a natural person means to state: the full name of the person and any names under which it conducts business; the present or last known address of the person; and, the present or last known telephone number of the person.
- k) “Identify” or “identifying” or “identification” when used in reference to a document means to provide with respect to each document requested to be

identified by these discovery requests a description of the document that is sufficient for purposes of a request to produce or a subpoena duces tecum, including the following:

- (a) the type of document (e.g., letter, memorandum, etc.);
- (b) the date of the document;
- (c) the title or label of the document;
- (d) the Bates stamp number or other identifier used to number the document for use in litigation;
- (e) the identity of the originator;
- (f) the identity of each person to whom it was sent;
- (g) the identity of each person to whom a copy or copies were sent;
- (h) a summary of the contents of the document;
- (i) the name and last known address of each person who presently has possession, custody or control of the document; and,
- (j) if any such document was, but is no longer, in your possession, custody or control or is no longer in existence, state whether it: (1) is missing or lost; (2) has been destroyed; or (3) has been transferred voluntarily or involuntarily, and if so, state the circumstances surrounding the authorization for each such disposition and the date of such disposition.

- l) “Identify” or “identifying” or “identification” when used in reference to communications means to state the date of the communication, whether the communication was written or oral, the identity of all parties and witnesses to the communication, the substance of what was said and/or transpired and, if written, identify the document(s) containing or referring to the communication.
- m) “Current” when used in reference to time means in the present time of this data request.
- n) “Customer” means a person or company (residential, commercial, or industrial) who buys retail electricity on a regular and ongoing basis from Kentucky Power Company.
- o) “Workpapers” are defined as original, electronic, machine-readable, unlocked, Excel format (where possible) with formulas in-tact.

OTHER INSTRUCTIONS

- a) Responses are to be provided in electronic format (e.g., text documents should be in the original word processor file format or PDF, data files should be in Excel).
- b) If you contend that any response to any data request may be withheld under the attorney-client privilege, the attorney work product doctrine or any other privilege 4 or basis, please state the following with respect to each such response in order to explain the basis for the claim of privilege and to permit adjudication of the propriety of that claim: 1) The privilege asserted and its basis; 2) The nature of

the information withheld; and, 3) The subject matter of the document, except to the extent that you claim it is privileged.

- c) For any document or set of documents Kentucky Power Company objects to providing to Sierra Club on the grounds it is burdensome or voluminous, please identify the specific document (see instruction (k) above).
- d) These data requests are to be answered with reference to all information in your possession, custody or control or reasonably available to you. These data requests are intended to include requests for information, which is physically within your possession, custody or control as well as in the possession, custody or control of your agents, attorneys, or other third parties from which such documents may be obtained.
- e) If any data request cannot be responded to or answered in full, answer to the extent possible and specify the reasons for your inability to answer fully.
- f) These data requests are continuing in nature and require supplemental responses should information unknown to you at the time you serve your responses to these data requests subsequently become known.
- g) For each response, identify all persons (see instruction (j)) that were involved in the preparation of the answers to the interrogatories below and/or are responsible for compiling and providing the information contained in each answer.
- h) Identify which witness(es) at the hearing is competent to adopt and/or discuss the response.
- i) Please produce the requested documents in electronic format to the following individuals:

Joe Childers, Joe@jchilderslaw.com
Nathaniel Shoaff, nathaniel.shoaff@sierraclub.org
Joshua Smith, joshua.smith@sierraclub.org
- j) Wherever the response to an interrogatory or request consists of a statement that the requested information is already available to the Sierra Club, provide a detailed citation to the document that contains the information. This citation shall include the title of the document, relevant page number(s), and to the extent possible paragraph number(s) and/or chart/table/figure number(s).
- k) In the event that any document referred to in response to any request for information has been destroyed, specify the date and the manner of such destruction, the reason for such destruction, the person authorizing the destruction and the custodian of the document at the time of its destruction.

- l) Sierra Club reserves the right to serve supplemental, revised, or additional discovery requests as permitted in this proceeding.

REQUESTS FOR INFORMATION

- 2.1 Refer to the Supplemental Testimony of Alex Vaughan at 6:4-10 addressing the Company's break even analysis for the four proposed options for the Unit 2 cooling tower.
 - a. Provide the break even analysis for options 1, 2, 3, and 4.
 - b. Provide the underlying workpapers, in native format, with formulas intact, for the break even analysis for each of the four options.
- 2.2 Refer to the Supplemental Testimony of Alex Vaughan at 6 n.4.
 - a. Provide the timeline for application and decisions associated with the Department of Energy's \$625 million investments in "America's coal industry."
 - b. Provide the total number of applications for this grant that the Department of Energy has received to date, if known.
 - c. If the Company has already applied for this funding, provide the application. If no such application has been filed, confirm that to be the case.
 - d. If the Department of Energy has already determined what the Company's grant award would be, provide that number.
- 2.3 Refer to the Supplemental Testimony of Vaughan at 9, Table AEV SD2, Cost to Customers Analysis. Provide the residential rate impact of each CPCN alternative and cooling tower options 1-4 under consideration.
- 2.4 Provide the estimated timeline for completion of each of the four options considered for the cooling tower, including any planned CPCNs that will be filed with the Commission.
- 2.5 Refer to Table AEV-SD1 at p. 4 of Vaughan's Supplemental Testimony.
 - a. Explain option 1 (exterior shell reinforcement) entails a "high risk of cost and schedule overruns."
 - b. Explain why option 1 entails "worst condition of tower still to come" even after reinforcement.
- 2.6 Provide the estimated timeline for completion of each of the four options considered for the cooling tower work.

Dated: October 20, 2025

Respectfully submitted,

/s/ Joe F. Childers

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CERTIFICATE OF SERVICE

This is to certify that the foregoing copy of Sierra Club's Supplemental Requests for Information to Kentucky Power Company in this action is being electronically transmitted to the Commission on October 20, 2025, and that there are currently no parties that the Commission has excused from participation by electronic means in this proceeding.

/s/ Joe F. Childers
JOE F. CHILDERS