

Kentucky Power Company  
KPSC Case No. 2025-00175  
Attorney General's First Set of Data Requests  
Dated August 11, 2025

**DATA REQUEST**

**AG 1\_1** Provide all workpapers utilized related to the application and testimony supporting the application.

**RESPONSE**

Please see KPCO\_R\_AG\_1\_1\_ConfidentialAttachment1;  
KPCO\_R\_AG\_1\_1\_ConfidentialAttachment3 through  
KPCO\_R\_AG\_1\_1\_ConfidentialAttachment7; KPCO\_R\_AG\_1\_1\_Attachment2; and  
KPCO\_R\_AG\_1\_1\_Attachment8 for the requested workpapers. Please also see the  
Company's responses to KPSC 1\_2, KPSC 1\_11, and KPSC 1\_22.

Witness: Joshua D. Snodgrass

Witness: Alex E. Vaughan

Witness: Lerah M. Kahn

Witness: Tanner S. Wolfram

KPCO\_R\_AG\_1\_1\_ConfidentialAttachment3 is redacted in its entirety.

KPCO\_R\_AG\_1\_1\_ConfidentialAttachment4 is redacted in its entirety.

KPCO\_R\_AG\_1\_1\_ConfidentialAttachment5 is redacted in its entirety.

KPCO\_R\_AG\_1\_1\_ConfidentialAttachment6 is redacted in its entirety.

KPCO\_R\_AG\_1\_1\_ConfidentialAttachment7 is redacted in its entirety.

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**DATA REQUEST**

**AG 1\_2**      See Testimony of Tanner Wolfram. Does Kentucky Power have current plans to add capacity resources in addition to the extension of Kentucky Power involvement in the Mitchell Plant. If yes, discuss Kentucky Power's load forecast in relation to all currently contemplated capacity resources.

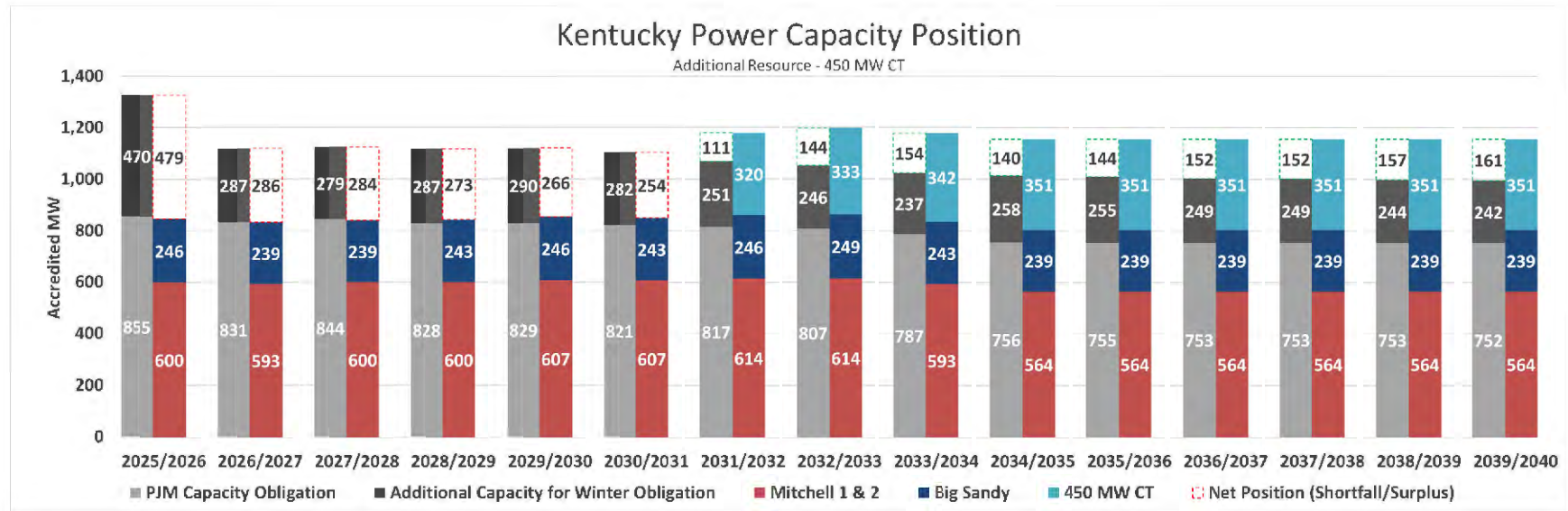
**RESPONSE**

Yes. As explained in the Company's response to KPSC 1\_5, the Company's current plan is to file an application no later than the first quarter of 2026 seeking approval to build a new 450 MW natural gas, combustion turbine ("CT") generator at the Big Sandy site. If the planned application is granted, the Company estimates that this new plant will reach commercial operation by 2031.

KPCO\_R\_AG\_1\_2\_Attachment1 shows the Company's capacity position with the Mitchell Plant extended and the new 450 MW CT online in 2031.

Upon review of Figure TSW-3 in Company Witness Wolfram's Direct Testimony, the Company identified a minor error in the calculation of the "Additional Capacity for Winter Obligation" segment of the figure. This error has been corrected and the updated value is reflected in KPCO\_R\_KPSC\_1\_2\_Attachment1.

Witness: Tanner S. Wolfram





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**DATA REQUEST**

**AG 1\_3**      See Testimony of Alex Vaughn regarding alternatives. Did the Company investigate the potential purchase of generating resources to supplement or replace the Mitchell capacity? If yes, please describe the potential transaction and why it was not selected.

**RESPONSE**

Yes. The Company engaged in negotiations in 2024 with the owner of an existing generation resource regarding the potential purchase of that resource. This resource would have addressed a portion of its energy and capacity needs. However, those negotiations were not successful, and the facility was subsequently sold to another party. The Company did not include that resource in its analysis as it is no longer available to the Company.

Witness: Alex E. Vaughan

Witness: Tanner S. Wolfram

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**DATA REQUEST**

**AG 1\_4** Did the Company engage with other Kentucky utilities to determine whether there was potential for cooperation through a PPA or other means to meet the capacity needs of its load? If yes, provide a description of those interactions. If not, why not.

**RESPONSE**

The Company has not directly engaged with any other Kentucky utility to discuss options for meeting a portion of its energy or capacity needs. As explained in Company Witness Wolfram's Direct Testimony, the Company issued an all-source RFP for PPAs in 2023 and did not receive any bids from the other Kentucky utilities. Furthermore, not all Kentucky utilities are members of, or provide service in, the same Regional Transmission Organization as the Company making transactions with those outside of the RTO challenging.

Witness: Tanner S. Wolfram

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**DATA REQUEST**

**AG 1\_5**      See Testimony of Lerah Kahn. Provide an alternative analysis of rate impacts which assumes the investments at issue here can be securitized.

**RESPONSE**

The Company estimates that the \$13.1 million proposed revenue requirement provided by Company Witness Kahn could be reduced by \$6.3 million if securitization legislation is passed and the amount in question was included in a larger securitization effort regarding the Mitchell Plant.

Witness: Alex E. Vaughan

Kentucky Power Company  
KPSC Case No. 2025-00175  
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**DATA REQUEST**

**AG 1\_6**        Discuss all additional relevant factors and circumstances not disclosed in the Application that have changed since the Commission entered its decision in Case No. 2021-00004 denying the ELG investment for the Mitchell Plant and which support the extension of Kentucky Power's involvement in the Mitchell Plant.

**RESPONSE**

Please see Company Witness Wolfram's Direct Testimony beginning on page 16 for a description of major changes since the Company's filing in Case No. 2021-00004. Please also see the Direct Testimony of Company Witness Vaughan at pages 6-7.

Additionally, since the Company filed its Application in this proceeding, the PJM Base Residual Auction ("BRA") for planning years 2026/2027 cleared at \$329.17/MW-day. This represents a 16% increase on the BRA price for planning years 2025/2026. This means that the Company's comparison to market is likely to be understated, and the Company's proposed investment in Mitchell is even more favorable compared to market.

Witness: Tanner S. Wolfram

## VERIFICATION

The undersigned, Lerah M. Kahn, being duly sworn, deposes and says she is the Regulatory Services Manager for Kentucky Power, that she 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 her information, knowledge, and belief.

Kend Kahn

Lerah M. Kahn

Commonwealth of Kentucky )  
 )  
County of Boyd )

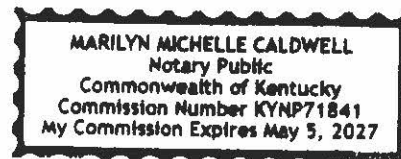
Case No. 2025-00175

Subscribed and sworn to before me, a Notary Public in and before said County  
and State, by Lerah M. Kahn, on August 22, 2025.

Maribor Michelle Caldwell  
Notary Public

My Commission Expires May 5, 2027

Notary ID Number      KYNP71841



## VERIFICATION

The undersigned, Joshua D. Snodgrass, being duly sworn, deposes and says he is the Mitchell Plant Manager, 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.

**Signed by:**

Joshua D. Snodgrass

0ED246E054924C3

Joshua D. Snodgrass

Commonwealth of Kentucky )

)

Case No. 2025-00175

)

County of Boyd

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

and State, by Joshua D. Snodgrass, on 8/13/2025 | 2:12 PM EDT

**Signed by:**

Michelle Caldwell

~~E9B1BC7AC31F421...~~

Notary Public

MARILYN MICHELLE CALDWELL  
ONLINE NOTARY PUBLIC  
COMMONWEALTH OF KENTUCKY  
Commission #KYNP71841  
My Commission Expires 5/5/2027

My Commission Expires May 5, 2027

Notary ID Number      KYNP71841

## Certificate Of Completion

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Signatures: 2

Envelope Originator:

Certificate Pages: 5

Initials: 0

Michelle Caldwell

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mmcaldwell@aep.com

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Joshua D. Snodgrass

jdsnodgrass@aep.com

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## Signature

Signed by:

*Joshua D. Snodgrass*

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## Electronic Record and Signature Disclosure:

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## Timestamp

## Editor Delivery Events

## Status

## Timestamp

## Agent Delivery Events

## Status

## Timestamp

## Intermediary Delivery Events

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## Certified Delivery Events

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## Timestamp

## Carbon Copy Events

## Status

## Timestamp

## Witness Events

## Signature

## Timestamp

## Notary Events

## Signature

## Timestamp

Michelle Caldwell

mmcaldwell@aep.com

Regulatory Case Coordinator

AEP Kentucky Power

Notary for Joshua D. Snodgrass

(jdsnodgrass@aep.com)

Security Level: Email, Account Authentication (Required), Digital Certificate

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MARILYN MICHELLE CALDWELL  
ONLINE NOTARY PUBLIC  
COMMONWEALTH OF KENTUCKY  
Commission #KYNP71841  
My Commission Expires 5/5/2027

Sent: 8/13/2025 1:53:54 PM

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Signed: 8/13/2025 2:13:04 PM

## VERIFICATION


The undersigned, Alex E. Vaughan, being duly sworn, deposes and says he is the Managing Director Regulated Pricing – Generation and Fuel Strategy 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.

  
Alex E. Vaughan

State of Ohio )  
 )  
County of Franklin )

Case No. 2025-00175

Subscribed and sworn to before me, a Notary Public in and before said County and State, by Alex E. Vaughan, on 08-21-2025.

  
Notary Public



BRETT E. SCHMIED, Attorney At Law  
NOTARY PUBLIC - STATE OF OHIO  
My commission has no expiration date  
Sec. 147.03 R.C.

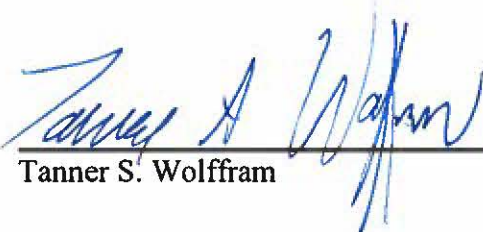
My Commission Expires N/A

Notary ID Number \_\_\_\_\_



## VERIFICATION

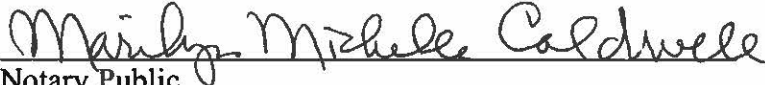
The undersigned, Tanner S. Wolfram, being duly sworn, deposes and says he is the Director of Regulatory Services for Kentucky Power, that he has personal knowledge of the matters set forth in the foregoing responses and the information contained therein is true and correct to the best of his information, knowledge, and belief.

  
Tanner S. Wolfram

Commonwealth of Kentucky )  
County of Boyd )

Case No. 2025-00175

Subscribed and sworn to before me, a Notary Public in and before said County and State, by Tanner S. Wolfram, on August 22, 2025.

  
Notary Public

My Commission Expires May 5, 2027

Notary ID Number KYNP71841

