

Kentucky Power Company
KPSC Case No. 2025-00175
Attorney General's Third Set of Data
Requests Dated October 20, 2025

DATA REQUEST

AG 3_1 See *Kentucky Power Coal Plant Needs A Big Repair. Could The Feds Help?* at https://wvpublic.org/story/energy-environment/kentucky-power-coal-plant-needs-a-big-repair-could-the-feds-help/?utm_campaign=Newsletter&utm_medium=email&_hsenc=p2ANqtZ--QjpW7zhCkr8Kaw7TchgkxkhYDVGBZeaSDaQQQXuHpsOIReySttZq8L5_ZANnzEMgxMsVU4JI6oPDikSdvHJZyu0wRww&_hsmi=385248292&utm_content=385248292&utm_source=hs_email.

Provide all available information related to the availability of federal funds to assist in mitigating the cost of the repair.

RESPONSE

Please see the Company's response to Sierra Club 2_2.

Witness: Tanner S. Wolffram

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AG 3_2 See Supplemental Testimony of Vaughan at 2.

“After execution began on the original cooling tower reinforcement and shell structure update, the AEP Generation Projects team determined in late July 2025 that additional engineering solutions and repairs would be necessary to fully address the cooling tower’s structural needs so that Unit 2 could remain operational.”

- a. Describe precisely what the team discovered that necessitated additional engineering solutions and repairs.
- b. Discuss whether these discoveries represent a failure of due diligence up to that point? If not, why not?
- c. Provide detailed data supporting the values provided in Table AEV-SD1.

RESPONSE

The Company objects to this request to the extent it mischaracterizes the testimony of Company Witness Vaughan. Subject to and without waiving that objection, the Company states as follows:

a.-b. As an initial matter, the work being done at the Unit 2 cooling tower included concrete and rebar repair, crack sealing, and application of a fiber reinforced cementitious matrix (“FRCM”) coating on a portion of the cooling tower.

The Company performed proper due diligence inspections prior to commencing the initial work on the cooling tower and in developing the initial project scope. For example, the team created a crack repair map by utilizing drones, LiDAR scans, and visual surveying. However, these remote inspection technologies are limited in their ability to perform a complete condition assessment, as they are only able to observe the surface of the tower. It is also important to note that the cooling tower is over 300 feet tall, and the inspections are looking for things like cracks that can be as small as 1/32 of an inch.

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As the work progressed up the cooling tower, and upon close-up, physical, hands-on inspection of the cooling tower, the team observed additional cracks and deterioration that could not have been identified by remote inspection technologies. These conditions only became apparent once repair work began in earnest and closer physical inspections could occur. At that time, the team determined that the original project scope would not fully address the structural needs of the cooling tower, and that additional engineering solutions and repairs would be necessary.

As stated in response to KPSC 3-1, the FRCM work was paused on July 23, 2025. The Company continued the rebar repairs for safety reasons and completed those repairs on September 26, 2025. Importantly, *because* of proper due diligence, the Company paused work to assess what additional engineering solutions and repairs would be necessary to fully address the structural needs of the Unit 2 cooling tower, and what the least-cost, most reasonable option to do so would be. There was no failure of due diligence at any point in the process.

c. Please see the Company's response to KPSC 3_9.

Witness: Alex E. Vaughan

Witness: Joshua D. Snodgrass

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AG 3_3 See Direct Testimony of Snodgrass at 8-9.

“[B]oth Mitchell Units have undergone extensive cooling tower upgrades and repairs...”

“Unit 2’s projects included the same components as Unit 1 along with cooling tower shell structure updates, which included fiber-reinforced cementitious matrix. These projects were necessary to extend the life of the cooling tower and cooling tower systems. The upgrades improved the efficiency of the cooling system, overall plant efficiency, and prevent future outages needed for repairs.”

a. Do these statements not indicate that the Unit 2 shell structure updates had already been completed at the time of the filing of the Snodgrass Direct Testimony?

b. If yes, is this not at odds with the Company’s new assertion that the work on Cooling Tower 2 was “temporarily halted” and therefore still ongoing in July, 2025, after the Snodgrass Direct Testimony was filed?

RESPONSE

The Company objects to this request to the extent it mischaracterizes the testimony of Company Witness Snodgrass and/or is argumentative. Subject to and without waiving those objections, the Company states as follows:

The Company acknowledges that Company Witness Snodgrass’s Direct Testimony states that inspections and repairs were completed on various components of the cooling tower system. These repairs include aged, hot deck replacement and various pump rebuilds. However, Company Witness Snodgrass’s Direct Testimony does not state, and should not be read to state, that the Unit 2 cooling tower reinforcement work more specifically described in the Company’s response to AG 3-2 was completed. In fact, Company Witness Snodgrass plainly indicated that there was Unit 2 cooling tower reinforcement work still to be completed, as demonstrated by the “forecast additional spend through December 2025” amounts (Column F, row 42) in Exhibit JDS-1.

Witness: Joshua D. Snodgrass

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AG 3_4 Given that the Company makes a profit by expending the most capital possible, is it not in the Company's interest to expend the maximum amount of capital possible which remains less than the next best (i.e. next least cost) generation alternative? Does this interest not give the Commission a valid reason to scrutinize these expenditures closely to determine whether they are necessary from an engineering perspective and view the proposed projects with skepticism?

RESPONSE

The Company objects to the extent the request is an incomplete hypothetical, mischaracterizes the Company's application and/or testimony, and is argumentative. The Company further objects to this request as vague, undefined, and overly broad. Subject to and without waiving these objections, the Company states as follows:

The Company rejects the premise of the question. The Company does not make decisions based solely on spending the most capital to increase earnings. What is best for customers is at the forefront of all of the Company's decisions, especially with respect to capital investments. When the Company selects the proposed solution to fully address the structural needs of the Unit 2 cooling tower, it will consider the total cost to customers of that solution, costs of replacement (if the unit was retired), operational feasibility (constructability), and cost of replacement energy where an alternative requires an extended outage of the plant, among other factors. When weighing those factors, it may be that the highest capital cost project will provide the most benefit to customers because it would, for example, extend the life of the plant, allow the Company to avoid extended outages requiring purchased energy and capacity from the market, and/or avoid spending capital on a lower cost option that may ultimately require additional capital down the line.

Further, to the extent any proposed solution requires a certificate of public convenience and necessity ("CPCN"), the Company must demonstrate that the proposed project is the least-cost, reasonable alternative. The Commission would also have the opportunity to review and scrutinize the prudence of the costs of the proposed solution as it would with any other proposed project for which the Company seeks cost recovery.

Witness: Tanner S. Wolffram

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AG 3_5 How many other cooling towers in AEP's fleet of plants have undergone this type of repair? Provide:

- a. Plant name and location;
- b. Date of Repair; and
- c. Cost of Repair

RESPONSE

The Company objects to this request to the extent it seeks information that is not relevant or reasonably calculated to lead to the discovery of relevant or admissible evidence. The Company further objects to this request because it seeks information not in the possession of the Company. Subject to and without waiving these objections, the Company states as follows:

a.-c. The Company is not aware of another plant in AEP's fleet that has undergone this exact type of repair. However, Kentucky Power has successfully completed concrete patching repairs at Big Sandy Unit 1 cooling tower in 2010, which is similar to part of the repairs at the Mitchell Unit 2 cooling tower. Although the Big Sandy project was similar, in part, it cannot be directly compared to Mitchell Unit 2 cooling tower reinforcement project, and the costs of the Big Sandy project are not appropriate to be used for the purpose of comparison.

Witness: Alex E. Vaughan

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AG 3_6 How often do cooling towers undergo routine inspection/maintenance/repairs? Is the deficiency identified here something that is reviewed/test for during those occurrences?

RESPONSE

The Company objects to this request as vague, undefined, overly broad, and argumentative. The Company further objects to this request to the extent it seeks information that is not relevant or not reasonably calculated to lead to the discovery of relevant or admissible evidence. The Company further objects to this request because it seeks information not in the possession of the Company. Subject to and without waiving these objections, the Company states as follows:

Hyperbolic cooling towers, like those at the Mitchell Plant, are inspected for structural integrity as needed or when specific issues are observable and identified. Necessary repairs are then carried out based on these assessments. In this instance, assessments, which led to the cooling tower reinforcement work, were prompted after plant personnel observed physical changes to the Unit 2 tower.

Witness: Joshua D. Snodgrass

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

Joshua D. Snodgrass

Commonwealth of Kentucky)
)
County of Boyd)

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Subscribed and sworn to before me, a Notary Public in and before said County
and State, by Joshua D. Snodgrass, on 10/24/2025 | 11:06 AM EDT.

Signed by:

Michelle Caldwell

Notary Public

My Commission Expires May 5, 2027

Notary ID Number KYNP71841

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

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 _____)
_____)
_____)

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Subscribed and sworn to before me, a Notary Public in and before said County and State, by Alex E. Vaughan, on October, 24 2025


Notary Public

My Commission Expires Does not expire

Notary ID Number _____



HAYDEN CAPACE
NOTARY PUBLIC - OHIO

VERIFICATION

The undersigned, Tanner S. Wolffram, 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)

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Subscribed and sworn to before me, a Notary Public in and before said County
and State, by Tanner S. Wolfram, on October 27, 2025.

Marilyn Michelle Caldwell
Notary Public

My Commission Expires May 5, 2027

Notary ID Number KYNP 71841

