

Kentucky Power Company
KPSC Case No. 2025-00175
Sierra Club's Second Set of Data Requests
Dated October 20, 2025

DATA REQUEST

- SC 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.

RESPONSE

The Company objects to this request on the basis that it misstates the Supplemental Testimony of Company Witness Vaughan. The Company further objects that the request for workpapers is vague and undefined. Subject to and without waiving this objection, the Company states as follows:

a.-b. There is no individual break-even analysis for each option. The break-even analysis, as described in the Supplemental Testimony of Alex Vaughan starting at page 7 line 12, was conducted to determine the maximum capital that could be spent on any option before it was no longer advantageous for the Company's customers to continue receiving capacity and energy from the Mitchell Plant after 2028. Please see the Company's response to KPSC 3_6 for all the workpapers supporting the Supplemental Testimony of Alex Vaughan including the break-even analysis.

Witness: Alex E. Vaughan

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DATA REQUEST

- SC 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.

RESPONSE

The Company objects to this request on the basis that it seeks information and/or documentation that is not in its control or possession. Subject to and without waiving this objection, the Company states as follows:

a-d. This grant opportunity was announced by the Department of Energy on September 29, 2025, and to the Company's knowledge, other than requiring that applications are due by November 13, 2025, the Department of Energy has not yet released any further detail regarding the timeline and specific application guidelines for this new funding. Accordingly, the Company has not yet filed an application, but will continuously monitor the opportunity. The Company plans to submit a timely application by November 13, 2025.

Witness: Alex E. Vaughan

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DATA REQUEST

SC 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

RESPONSE

The Company objects to this request because it seeks information not in the possession of the Company as it has not performed the requested analysis, is vague and ambiguous, and would be unduly burdensome to provide. Furthermore, options 1 and 2 were not included in Table AEV SD2.

Subject to and without waiving these objections, Table AEV SD2 (pp. 9) provides a summary comparing the total cost for each alternative filed in the Company's direct case along with Options 3 and 4 and the two break-even capital numbers. The table below identifies percent change from the total cost of Alternative 1. The relative residential rate impacts of Option 3, Option 4, Break Even Ceiling, and Break Even Floor compared to Alternative 1 would be directionally the same, but less in magnitude, as the difference in total cost. Alternative 2 utilizes conservative PPA pricing information that the Company believes, based on industry news and trends and the continuous narrowing of supply and demand in the market, to be lower than today's market for PPAs and, accordingly, is a conservatively low estimate.

Alternative	Total Cost	% Increase from Alternative 1
Alt 1 - Mitchell	\$ 335,405,979	
Alt 2 - PPAs	\$ 471,440,143	41%
Alt 3 - Market	\$ 895,305,244	167%
Option 3 - New Mechanical Draft	\$ 375,956,757	12%
Option 4 - Shorten Tower	\$ 356,031,775	6%
Break Even Ceiling	\$ 521,464,693	55%
Break Even Floor	\$ 514,078,188	53%

Witness: Alex E. Vaughan

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DATA REQUEST

SC 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.

RESPONSE

The Company objects to this request because it seeks information that is not known at this time, is vague and ambiguous, and would be unduly burdensome to provide. The Company further objects to the extent the request calls for a legal conclusion. Subject to and without waiving these objections, the Company states as follows.

As explained in Company Witness Vaughan's Supplemental Testimony, the Company has not made an ultimate decision on which of the alternative projects it will present to the Commission for approval. Therefore, the Company cannot provide an exact date on which it plans to file any CPCN application, nor can it confirm that a CPCN would be required for any related project at this time. That said, please see Table AEV-SD1 included in Company Witness Vaughan's Supplemental Testimony for the estimated timelines for the options to address the structural needs of the Unit 2 cooling tower as well as KPCO_R_KPSC_3_5_ConfidentialAttachment1.

Witness: Tanner S. Wolfram

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DATA REQUEST

- SC 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.

RESPONSE

The Company objects to this request on the basis that it misstates the Supplemental Testimony of Company Witness Vaughan. Subject to and without waiving these objections, the Company states as follows:

a-b. Please see the Company’s response to AG 3_2 (a) and (b). The Company anticipates that the yet-to-be repaired portions of the cooling tower (those needed at the highest elevations of the tower) could require more significant repairs than originally scoped and could require further extension of the project schedule and could cause potential cost overruns. Because the Company is still in the process of determining the full extent of work that would be required under Option 1, the Company does not know at this time exactly how long the project schedule may be extended, or the amount of the potential increase in costs. It is, however, working diligently to answer those questions. Nonetheless, Table AEV-SD1 notes these potential risks because they must be taken into account when determining which repair option is the least-cost, reasonable solution.

Witness: Alex E. Vaughan

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DATA REQUEST

SC 2_6 Provide the estimated timeline for completion of each of the four options considered for the cooling tower work.

RESPONSE

Please see the response to SC 2_4.

Witness: Alex E. Vaughan

VERIFICATION

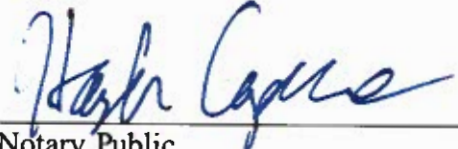
The undersigned, Alex E. Vaughan, being duly sworn, deposes and says he is the Managing Director Regulated Pricing – Generation and Fuel Strategy for American Electric Power Service Corporation that he has personal knowledge of the matters set forth in the foregoing responses and the information contained therein is true and correct to the best of his information, knowledge, and belief


Alex E. Vaughan

State of Ohio _____

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) Case No. 2025-00175
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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

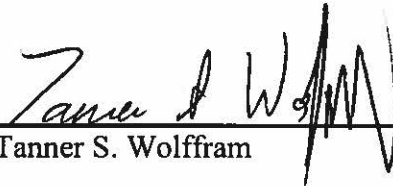
Notary ID Number _____



HAYDEN CAPACE
NOTARY PUBLIC - OHIO

VERIFICATION

The undersigned, Tanner S. 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 October 27, 2025.


Notary Public

My Commission Expires May 5, 2027

Notary ID Number KYNP71841

