

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

KPSC 4_1 Refer to Kentucky Power's response to Commission Staff's Third Request for Information (Staff's Third Request), Item 11(c), indicating that the annual revenue requirement effect of the Commission adopting Alternative 1 as compared to the status quo in 2026, 2027, and 2028 is contained in KPCO_R_AG 1_1_Attachment2. Identify where in that document the information requested in Item 11(c) is contained.

RESPONSE

Kentucky Power misunderstood Commission Staff's Data Request 3_11(c). To the extent Commission Staff is requesting the annual revenue requirement impact for approving this Application ("Alternative 1") for the period of 2026-2028, that revenue requirement is the sum of (a) the revenue requirement associated with Project 23 (the "ELG Project") of the Company's environmental compliance plan ("ECP") and (b) the revenue requirement associated with Kentucky Power making the investments necessary to reflect a 50% interest in the non-ELG capital projects at Mitchell that have previously been asymmetrically allocated between Kentucky Power and Wheeling Power (the "Non-ELG Catch Up").

The table below shows the currently estimated combined first year revenue requirement associated with Alternative 1. Please note the following:

(a) the recovery of the two components to the full revenue requirement for Alternative 1 will begin at different times – the recovery of the ELG Project revenue requirement through the environmental surcharge will begin as soon as practicable after an order is issued approving the requested changes to the Company's ECP and Tariff E.S. while the recovery of the Non-ELG Catch Up revenue requirement will begin after it updates the Generation Rider it has proposed in its currently pending rate case (Case No. 2025-00257) to incorporate such costs (anticipated to occur in the second or third quarter of 2026) to the extent that mechanism is approved; and

(b) the Company calculated the first year revenue requirement for the ELG Project utilizing the Company's currently authorized weighted average cost of capital ("WACC") while the first year revenue requirement for the Non-ELG Catch Up was calculated using the WACC proposed in Case No. 2025-00257. To the extent that the WACC applied to the calculation of the environmental surcharge is updated in Case 2025-00257, the updated WACC will be applied prospectively from the date of the order in Case 2025-00257.

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Item	Recovery Method	1st Year Rev Req	Anticipated Start	Source
ELG Project Rev Req	Environmental Surcharge	\$13,103,816	~January 2026	Exhibit LMK-4 (As Filed)
Non-ELG Catch Up Rev Req	Generation Rider	\$6,239,458	~Q2-Q3 2026	KPCO_R_KPSC_4_1_Attachment1 (which isolates the Non-ELG Catch Up from the Company's response to KPSC 2_28 in Case No. 2025-00257)
Total		\$19,343,274		

Witness: Alex E. Vaughan

Witness: Lerah M. Kahn

Witness: Tanner S. Wolffram

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- KPSC 4_2** Refer to the Supplemental Testimony of Alex Vaughan (Vaughan Supplemental Testimony), Table AEV-SD3. Refer to Kentucky Power's response to Staff's Third Request, Item 6 and 9(c). Refer to Kentucky Power's response to the Attorney General's First Request for Information (AG's First Request), Item 1.
- a. For attachments KPCO_R_AG_1_1_Attachment2, KPCO_R_AG_1_1_ConfidentialAttachment3 through KPCO_R_AG_1_1_ConfidentialAttachment7 and KPCO_R_KPCS_3_6_ConfidentialAttachment1 through KPCO_R_KPCS_3_6_ConfidentialAttachment9, explain the scenarios/portfolios in Table AEV-SD3 of the Vaughan Supplemental Testimony to which each attachment applies.
- b. Provide the coal and natural gas prices per unit, e.g. per ton, MMBtu, etc., used in each year to determine the annual fuel costs reflected in the workpapers that support the costs reflected in Table AEV-SD3 for each of the portfolios/scenarios referenced.
- c. Explain how the coal and natural gas prices were determined for each portfolio/scenario, including why the fuel prices remained the same or were varied across the portfolios/scenarios referenced in Table AEV-SD3.
- d. Identify and provide any documentation Kentucky Power or its affiliate used to support its fuel cost assumptions.
- e. For each type of unit, identify the types of costs included in Kentucky Power's variable operation and maintenance expense reflected in the workpapers supporting costs of the units, and explain how Kentucky Power determined the per unit amounts for each category of variable operation and maintenance expense. If per unit amounts were determined, in whole or in part, from information Kentucky Power received from affiliates, explain how the affiliate or persons associated with the affiliate determined the per unit amounts for each portfolio/scenario.
- f. Provide an itemized breakdown and workpapers, in Excel spreadsheet format with all formulas, columns, and rows unprotected and fully accessible, showing the calculation the annual amounts in Excel line 34 in Tab "OPCO Rev Req" of KPCO_R_AG_1_1_ConfidentialAttachment6,

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and provide the net present value effects of using a 10 year as opposed to a 20-year amortization period for those costs.

g.: Explain how the Energy Margins in Excel line 8 and 14 in Tab PPAs of KPCO_R_AG_1_1_PublicAttachment1 were calculated and provide workpapers for those amounts in Excel spreadsheet format with all formulas, columns, and rows unprotected and fully accessible. If such workpapers have already been produced, identify the portions of those workpapers in the record reflecting the calculation of those amounts.

RESPONSE

a.

Discovery Attachment Name	Scenario from Table AEV-SD3
KPCO_R_AG_1_1_Attachment2	Not in Table AEV-SD3. Alternative 1 Mitchell Cost of Service in Table AEV SD2
KPCO_R_AG_1_1_ConfidentialAttachment3	Alternative E1
KPCO_R_AG_1_1_ConfidentialAttachment4	Alternative E2
KPCO_R_AG_1_1_ConfidentialAttachment5	Alternative E3
KPCO_R_AG_1_1_ConfidentialAttachment6	Alternative E4
KPCO_R_AG_1_1_ConfidentialAttachment7	Alternative E5
KPCO_R_KPSC_3_6_ConfidentialAttachment1	Not in Table AEV-SD3. Option 3 - New Mechanical Draft in Table AEV SD2
KPCO_R_KPSC_3_6_ConfidentialAttachment2	Not in Table AEV-SD3. Option 4 - Shorten Tower in Table AEV SD2
KPCO_R_KPSC_3_6_ConfidentialAttachment3	Not in Table AEV-SD3. Break Even Floor in Table AEV SD2
KPCO_R_KPSC_3_6_ConfidentialAttachment4	Not in Table AEV-SD3. Break Even Ceiling in Table AEV SD2
KPCO_R_KPSC_3_6_ConfidentialAttachment5	Option 3 New Mechanical Draft Cooling Tower
KPCO_R_KPSC_3_6_ConfidentialAttachment6	Option 4 Shorten Tower
KPCO_R_KPSC_3_6_ConfidentialAttachment7	Break Even To Alt E4 PV Rev Req
KPCO_R_KPSC_3_6_ConfidentialAttachment8	Break Even to Alt E4 Avg Rev Req
KPCO_R_KPSC_3_6_ConfidentialAttachment9	Summary Comparison File that contains Table AEV SD2 and Table AEV-SD3

b. Please refer to Attachments 2 and 3 to the Company's response to Sierra Club 1_12. The requested pricing for Alternatives E1-E4 is included in Attachment 2. The requested pricing for Alternative E5 is included in Attachment 3.

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c. The Company's 2024 fundamental pricing forecast was used to determine coal and natural gas pricing in all scenarios. The "reference case" from the fundamental pricing forecast, included in Attachment 2 to the Company's response to SC 1_12, incorporates the impacts of the currently effective 2024 ELG rule and 111d GHG rule and assumes that those rules remain in effect for the forecast period. The "delayed environmental" scenario from the fundamental pricing forecast, included in Attachment 3 to the Company's response to SC 1_12, is used for Alternative E5 and assumes the referenced environmental regulations are delayed until 2042.

d. There are five fuel forecasts used in the Fundamental Model: natural gas, hydrogen, uranium, coal, and oil. AEPSC creates forecasts for natural gas, hydrogen, and uranium. The forecasts for coal and oil are provided under license from Wood Mackenzie and Platts, respectively. The natural gas forecast begins by projecting prices for the Henry Hub. The Henry Hub is a natural gas distribution hub located in Erath, LA. It interconnects nine interstate and four intrastate pipelines. The historical importance of the Henry Hub is such that it is the key natural gas index in North America. It serves as the primary pricing point for natural gas futures contracts on the New York Mercantile Exchange (NYMEX). The Henry Hub price forecast is created using a linear modeling approach that analyzes data from January 2010 to the time of the forecast.

2010 marked a significant point within the broader shale play era. This era was driven by advancements in hydraulic fracturing (fracking) and horizontal drilling technologies that led to a dramatic increase in domestic natural gas production in the U.S. which subsequently decreased the cost of natural gas.

Low-cost natural gas led to a structural change in the domestic natural gas market and transformed the U.S. from a net importer to a net exporter of natural gas. The forecasted price is influenced by several key factors which are:

- Year-over-year growth in production
- Exports
- Heating degree days in Florida
- Cooling degree days in New York
- The Producer Price Index (PPI) for oil and gas extraction
- Year-over-year growth in the Consumer Price Index (CPI)

Since the natural gas market is regional in nature, it is important to understand prices in the other areas of interest. In addition to Henry Hub, thirteen hubs in the Eastern Interconnect

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and ERCOT are analyzed. Price differences between these hubs are driven by their unique supply and demand dynamics.

Each of the thirteen hubs may exhibit stronger seasonal trends or behave differently to Henry Hub over the long term. This is particularly evident when comparing the northeastern gas market to that of the Gulf Coast. In the Northeast, the primary demand sectors are heating and power generation, while in the Gulf, demand is driven by exports, power generation, and industrial needs. As a result, the Northeast tends to display a more pronounced seasonal trend, whereas the Gulf is more influenced by international trade.

A statistical modeling approach is used to forecast prices. Creating linear models for each location would be time-consuming and challenging to maintain. Additionally, prices are interconnected; the relationships between hubs due to pipelines mean that production and consumption in one region can impact prices in another. To address these challenges, a specialized methodology was developed. The statistical models employed were gradient boosted machines, a type of machine learning model. Inputs into the model included prices from other regions.

e. Capital and operating cost estimates for environmental compliance scenarios, incorporating options to comply with the ELG, GHG and MATS rules, were developed using a structured and comprehensive approach. This approach included reviewing historical project data; consulting with internal subject matter experts, external original equipment manufacturers and architect-engineer firms; and referencing cost information from similar projects, particularly the Welsh Plant Gas Conversion Class 5 estimate for GHG rule compliance costs. Historical data provided a reliable baseline for expected costs related to similar compliance measures, while expert insights ensured the estimates reflected current industry standards. By scaling estimates from similar ELG, GHG and MATS rules compliance projects, the Company was able to leverage existing data while adjusting for specific factors that may influence costs.

f. Please see Tab “20 Yrs – 100% Gas” in Attachment 8 to the Company’s response to AG 1-1 for the calculation of the net book value (“NBV”) recovery for the Mitchell Plant, found on Excel line 34 in Tab “OPCO Rev Req” of KPCO_R_AG_1 1 ConfidentialAttachment6. Utilizing a 10-year recovery period instead of a 20-year recovery of the NBV of Kentucky Power’s 50% share of the Mitchell Plant would result in a Present Value Revenue Requirement that is approximately \$51 million less for Alternative E4 than what is shown in Confidential Table AEV-SD3.

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g. These energy margins were calculated during the process of analyzing the responses to the Company's 2023 All-Source RFP to determine relative ranking among the proposals. The margins were calculated by multiplying the expected generated energy for a given year by the forecasted energy price for that year, less the expected power production costs.

Witness: Alex E. Vaughan

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DATA REQUEST

KPSC 4_3 Refer to the Vaughan Supplemental Testimony, Table AEV-SD3. Refer to Kentucky Power's response to Staff's Third Request, Item 9(c). Refer to Kentucky Power's response to the Attorney General's First Request for Information (Attorney General's First Request), Item 1.

a. Explain whether the natural gas combined cycle unit (NGCC) identified in Alternative E4 of Table AEV-SD3 was, for the purpose of calculating the amounts reflected in Table AEV-SD3, limited to an average annual capacity factor of 40 percent or some other amount to reflect the effects of the proposed greenhouse gas rules, and if so, explain how and the extent to which it was limited.

b. Provide an update to the workpaper provided to support Alternative E4, KPCO_R_AG_1_1_ConfidentialAttachment6, that calculates the production costs, revenue, and other amounts without any constraint on capacity factors to comply with the greenhouse gas rules but which otherwise uses all of the same assumptions and inputs.

c. Provide an update to the workpaper provided to support Alternative E4, KPCO_R_AG_1_1_ConfidentialAttachment6, that calculates the production costs, revenue, and other amounts by removing any constraints on capacity factors to comply with the greenhouse gas rules and removing the 1,200 MW NGCC unit currently reflected in that alternative and substituting the approximately 600 MW NGCC unit identified in the Key Supply-Side Option Assumptions chart in Tab "Input" of KPCO_R_AG_1_1_ConfidentialAttachment6.

d. Provide an update to Table AEV-SD3 that includes the Levelized Cost of Energy, Present Value Revenue Requirement, Average Annual Revenue Requirement, and Up Front Capital Costs for the scenarios/portfolios identified in subpart b. and c. above in the same manner that it provides those amounts for the scenarios/portfolios currently listed in the table.

RESPONSE

a. Yes, because Alternative 4 assumed that current applicable laws would remain in place throughout the forecast period, the NGCC was limited to a 40% annual capacity factor.

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- b. The requested analysis is not possible as all other assumptions cannot be held constant while only changing the capacity factor limitations. For example, the underlying commodity pricing was developed also assuming the referenced environmental regulations and associated capacity factor limitations. Please see KPCO_R_KPSC_4_3_ConfidentialAttachment1, which utilizes the delayed environmental fundamental forecast which removes the capacity factor limitation on the hypothetical combined cycle.
- c. The Company has not performed the requested hypothetical 600 MW NGCC analysis because the post-2031 Alternatives evaluated shown on Table AEV-SD3 are Alternatives for the Mitchell Plant as a whole. The hypothetical 600 MW NGCC would not meet the Company's capacity needs because the ELCC accreditation for a 600 MW NGCC would be less than the 606 MW of accredited capacity Mitchell currently provides the Company.
- d. Please see the Company's response to parts b and c.

Witness: Alex E. Vaughan

KPCO_R_KPSC_4_3_ConfidentialAttachment1 is redacted in its entirety.

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DATA REQUEST

KPSC 4_4 Refer to the Vaughan Supplemental Testimony, Table AEV-SD3. Refer to Kentucky Power's response Staff's Third Request, Item 9(c). Refer to Kentucky Power's response to the Attorney General's First Request, Item 1. Refer to Kentucky Power's response to Commission Staff's First Request for Information (Staff's First Request), Item 5b in which Kentucky Power indicates an intent to seek approval for a new 450 MW natural gas simple cycle combustion turbine (SCCT) generating unit located in Kentucky Power's service territory.

a. State whether the calculation of the annual revenue requirement in the workpapers for Alternative E1, Alternative E2, and Alternative E5 in the years in which Mitchell Units 1 and 2 remain in operation includes the estimated cost of market energy purchases necessary to serve load that exceeds Kentucky Power's native generating capacity and the estimated cost of market energy purchases when Kentucky Power's units are not operating for any reasons, including a forced outage or circumstances in which they are not economically dispatched.

b. Provide an update to the workpapers provided to support Alternative E5 that calculates the production costs, revenue, and other amounts using all of the same assumptions and inputs used in the workpapers for Alternative E5 except that it adds the 450 MW SCCT for which Kentucky Power intends to seek approval.

c. Provide an update to Table AEV-SD3 that includes the Levelized Cost of Energy, Present Value Revenue Requirement, Average Annual Revenue Requirement, and Up Front Capital Costs for the scenario/portfolio identified in subpart b. above in the same manner that it provides those amounts for the scenarios/portfolios currently listed in the table.

RESPONSE

a. Please refer to the Direct Testimony of Company Witness Vaughan at part V which describes the evaluation of alternatives for the future of the Mitchell Plant beyond December 31, 2031 when, under current environmental regulations, the Plant must cease to operate as a coal-fired generating station. The evaluation of these alternatives are meant to demonstrate that regardless of current environmental regulations there are multiple

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reasonable future options for the Company's interest in the Mitchell plant. The analyses do not contemplate energy and capacity requirements beyond those provided by the Mitchell plant.

b.-c. The Company is still in the process of gathering costs and finalizing operational inputs and assumptions for the 450 MW CT that it plans to seek a certificate of public convenience and necessity ("CPCN") for at the Big Sandy site. Accordingly, it would be premature for the Company to provide the requested analysis for the 450 MW CT. The Company's current plan is to file the CPCN for the 450 MW CT at the Big Sandy Site in the first quarter of 2026.

Witness: Alex E. Vaughan

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DATA REQUEST

KPSC 4_5 Refer to Kentucky Power's response to Staff's First Request, Item 2, Attachment 2. Using the information in Attachment 2 for the period 2025-2040, provide and explain Kentucky Power's seasonal capacity position, and resulting seasonal reserve margins currently. Include in the response the extent of any sales to municipal customers.

RESPONSE

As of May 31, 2025, the Company no longer serves any municipal wholesale customers.

Please see Attachment 1 to the Company's response to AG 1_2 for the requested information. On Attachment 1, the bar color coded for "PJM Capacity Obligation" reflects the Company's summer capacity requirements and the bar color coded for "Additional Capacity for Winter Obligation" adds a winter capacity obligation to the Company's current summer capacity requirements. As demonstrated in Attachment 1 to the Company's response to AG 1_2, the combined accredited capacity of the Michell Plant and Big Sandy Plant is sufficient to meet the Company's summer capacity needs. However, to meet a winter capacity obligation, the Company would need to add roughly 280 MW of accredited capacity. The Company's current plan to build a new 450 MW CT is estimated to provide approximately 350 MW of accredited capacity. The addition of the 450 MW CT would enable the Company to meet a winter capacity obligation as well as provide the Company some capacity length in its generation portfolio starting in PJM planning year 2031/2032.

Witness: Tanner S. Wolfram

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DATA REQUEST

KPSC 4_6 Refer to Kentucky Power's most recent Integrated Resource Plan (IRP) in Case No. 2023-00092 Table "New Generation Technologies Key Supply-Side Resource Option Assumption," page 218 of 1,182. Provide an update to the table using the most current information. In updating the table, items including carbon capture and 20-hour storage technologies can be omitted. Also, additional duration hour sizes of Lithium-Ion batteries up to 10 hours should be added to the table.

RESPONSE

Please see the Company's response to KPSC 1_24 and Attachment 1 thereto for the most recent update to the Key Supply Side Resource Option Assumptions. The estimates provided in that response represent the most current information.

Witness: Alex E. Vaughan

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DATA REQUEST

KPSC 4_7 Refer to Kentucky Power's response to Staff's First Request, Item 3c. Using Kentucky Power's AURORA, PLEXOS or similar software, its most recent load forecasts provided in Item 3c, and the information provided in the updated table containing New Generation Technologies Key Supply-Side Resource Option Assumptions, provide and explain an update to the analyses performed in the IRP resulting in a reasonably least cost optimal resource portfolio in tabular form, including any capacity purchase agreements, Kentucky Power's seasonal capacity position, resulting reserve margins, and present value revenue requirement (PVRR) assuming Kentucky Power retains its undivided 50 percent ownership share of the Mitchell station.

RESPONSE

The Company cannot provide the requested information within a reasonable timeframe for this proceeding. Unlike KPSC 1_2c (which the Company interprets to be the intended reference for this request), which asked for an update to the Company's peak demand and energy load forecast – a forecast that the Company routinely updates – this request asks the Company to run IRP modeling systems to prepare an updated cost optimal resource portfolio. This request essentially asks the Company to prepare a new IRP. An IRP is a complicated and intricate modeling exercise that is costly and requires months to complete.

Moreover, the Company respectfully asserts that it does not need to develop a new IRP for the Commission to approve the requests in this case. This is because an IRP is intentionally a snapshot in time and is only a tool used to help inform the Company's policy decisions and strategies. An IRP does not represent the Company's decisions regarding the generation resources it utilizes to serve its customers. Additionally, the IRP planning tool does not perform its analyses utilizing retail revenue requirement calculations for the generation options. Therefore, the portfolios it selects are not necessarily the lowest cost options for the Company's customers. The Company performs revenue requirement analysis as part of its ultimate resource selection process accounting for real-world resource availability and costs that are obtained through an RFP or other market evaluations. This revenue requirement analysis drives the Company's resource acquisition process as it evaluates the reasonably least cost option of available generation to provide reliable service to its customers.

Witness: Tanner S. Wolfram
Witness: Alex E. Vaughan

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DATA REQUEST

KPSC 4_8 Refer to Kentucky Power's response to Staff's First Request, Item 3c. Using Kentucky Power's AURORA, PLEXOS or similar software, its most recent load forecasts provided in Item 3c, and the information provided in the updated table containing New Generation Technologies Key Supply-Side Resource Option Assumptions, provide and explain an update to the analyses performed in the IRP resulting in a reasonably least cost optimal resource portfolio in tabular form, including any capacity purchase agreements, Kentucky Power's seasonal capacity position, resulting reserve margins, and present value revenue requirement (PVR) assuming Kentucky Power divests its undivided 50 percent ownership share of the Mitchell station.

RESPONSE

Please see the Company's response to KPSC 4_7.

Witness: Alex E. Vaughan

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DATA REQUEST

KPSC 4_9 Refer to Kentucky Power's response to Staff's First Request, Item 3c. Using Kentucky Power's AURORA, PLEXOS or similar software, its most recent load forecasts provided in Item 3c, and the information provided in the updated table containing New Generation Technologies Key Supply-Side Resource Option Assumptions, provide and explain an update to the analyses performed in the IRP resulting in a reasonably least cost optimal resource portfolio in tabular form, including any capacity purchase agreements, Kentucky Power's seasonal capacity position, resulting reserve margins, and PVRR assuming Kentucky Power partially divests its ownership share of the Mitchell station on a pro rata basis based on its 50 percent share of the total net book value of Mitchell station in 2028 less the net book value of the ELG investment in 2028 as compared to the total remaining net book value of Mitchell Station in 2028.

RESPONSE

Please see the Company's response to KPSC 4_7.

Witness: Alex E. Vaughan

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DATA REQUEST

KPSC 4_10 Refer to Kentucky Power's response to Staff's First Request, Item 5b.

- a. Explain and provide the analysis supporting the decision to select a 450 MW SCCT as opposed to a NGCC or different sized SCCT. Include in the response the estimated cost of the SCCT.
- b. Explain whether Kentucky Power has paid any reservation fees for and or contracted for a SCCT turbine and any other necessary SCCT components. If so, provide the amount of fees that have been paid, the maker of the SCCT and the anticipated delivery date.
- c. If Kentucky Power has paid a reservation fee or signed a contract pertaining to a SCCT, explain whether it has the option to increase or decrease the size of the SCCT and any timelines to do so.
- d. If Kentucky Power has paid a reservation fee or signed a contract pertaining to a SCCT, provide a copy of any contracts or agreements entered into with any SCCT manufacturer or agent thereof.
- e. If Kentucky Power has paid a reservation fee and/or signed a contract pertaining to a SCCT, explain whether the contract language enables the Company to substitute a NGCC unit for the SCCT unit.

RESPONSE

a. The Company is planning to file in the first quarter of 2026 an application for a CPCN to construct a 450 MW CT at the Big Sandy site and is still in the process of gathering costs and finalizing operational inputs and assumptions to support that application. As part of that application, the Company will provide detailed analysis of why it selected the CT as compared to a CC option. At a high level, the Company's current plan is based on its expected capacity needs to meet its winter requirements and total costs of the options. The CC options are more expensive and, should this application be approved, the Company's capacity position would support a smaller peaking unit as compared to a larger base-load CC option.

b. Kentucky Power has paid a turbine reservation fee of \$10 million. Please see KPCO_R_KPSC 4 10 ConfidentialAttachment1 for the remaining requested information. [REDACTED]

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[REDACTED]

[REDACTED]

d. Please see subpart b.

e. Please see subpart c.

Witness: Tanner S. Wolfram

KPCO_R_KPSC_4_10_ConfidentialAttachment1 is redacted in its entirety.

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DATA REQUEST

KPSC 4_11 Provide a detailed explanation and supporting production cost modeling results that supports the application of the SCCT peaking resource option versus a NGCC base load resource options.

RESPONSE

Please see the Company's response to KPSC 4_4 subpart b&c and KPSC 4_10 subpart a.

Witness: Alex E. Vaughan

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DATA REQUEST

KPSC 4_12 Provide and explain the net book value of Kentucky Power's undivided 50 percent share of the Mitchell Station assets as of June 30, 2025.

RESPONSE

Please see KPCO_R_KPSC_4_12_Attachment1 for the net book value of the Mitchell Plant at June 30, 2025.

Witness: Alex E. Vaughan

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DATA REQUEST

KPSC 4_13 Provide and explain the net book value of the ELG assets as of June 30, 2025.

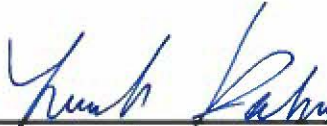
RESPONSE

The net book value for ELG as of June 30, 2025 is \$119,666,501.

Witness: Lerah M. Kahn

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.

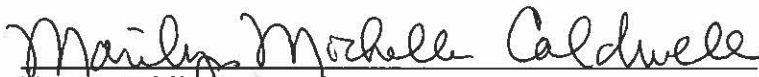


Lerah M. Kahn

Commonwealth of Kentucky)
)
County of Boyd)

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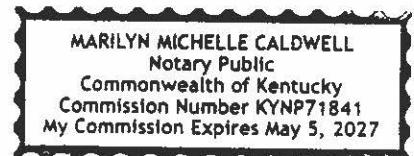
Subscribed and sworn to before me, a Notary Public in and before said County and State, by Lerah M. Kahn, on November 12, 2025



Notary Public

My Commission Expires May 5, 2027

Notary ID Number KYNP71841



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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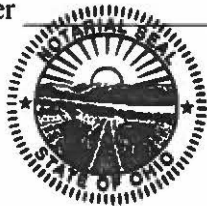
Subscribed and sworn to before me, a Notary Public in and before said County
and State, by Alex E. Vaughan, on November 13, 2025



Notary Public

My Commission Expires Does not expire

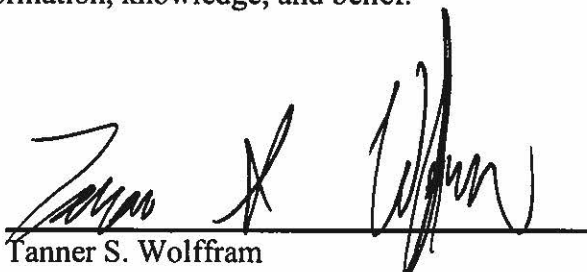
Notary ID Number _____



HAYDEN CAPACE
NOTARY PUBLIC - OHIO

VERIFICATION

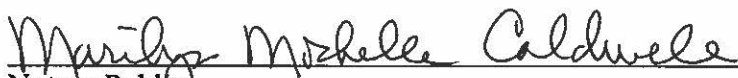
The undersigned, Tanner S. Wolffram, being duly sworn, deposes and says he is the Director of Regulatory Services for Kentucky Power, that he has personal knowledge of the matters set forth in the foregoing responses and the information contained therein is true and correct to the best of his information,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

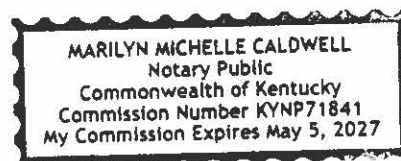

Tanner S. Wolffram

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. Wolffram, on November 12, 2025.


Notary Public



My Commission Expires May 5, 2027

Notary ID Number KYNP71841