

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 And Necessity To Make The Capital	)	
Investments Necessary To Continue Taking Capacity	)	
And Energy From The Mitchell Generating Station	)	Case No. 2025-00175
After December 31, 2028, (2) An Amended	)	
Environmental Compliance Plan, (3) Revised	)	
Environmental Surcharge Tariff Sheets, And (4) All	)	
Other Required Approvals And Relief	)	

DIRECT TESTIMONY OF
JOSHUA D. SNODGRASS
ON BEHALF OF KENTUCKY POWER COMPANY

**DIRECT TESTIMONY OF
JOSHUA D. SNODGRASS ON BEHALF OF
KENTUCKY POWER COMPANY
BEFORE THE PUBLIC SERVICE COMMISSION OF KENTUCKY**

CASE NO. 2025-00175

TABLE OF CONTENTS

<u>SECTION</u>	<u>PAGE</u>
I. INTRODUCTION	1
II. BACKGROUND	1
III. PURPOSE OF TESTIMONY	2
IV. MITCHELL PLANT AND OPERATIONAL OVERVIEW	2
V. ELG PROJECT, STATUS, AND COST	4
VI. NON-ELG CAPITAL PROJECTS COMPLETED TO CONTINUE RUNNING MITCHELL AS A COAL PLANT AFTER DECEMBER 31, 2028	7
VII. THE NON-ELG PROJECTS COMPLETED TO CONTINUE RUNNING MITCHELL AS A COAL PLANT AFTER DECEMBER 31, 2028 CONTRIBUTE TO THE SAFE, EFFICIENT, AND ENVIRONMENTALLY COMPLIANT OPERATION OF THE MITCHELL PLANT	11
VIII. CONCLUSION.....	15

EXHIBITS

Exhibit

Description

Exhibit JDS-1

Breakdown of non-ELG capital costs

**DIRECT TESTIMONY OF
JOSHUA D. SNODGRASS ON BEHALF OF
KENTUCKY POWER COMPANY
BEFORE THE PUBLIC SERVICE COMMISSION OF KENTUCKY**

CASE NO. 2025-00175

I. INTRODUCTION

1 **Q. PLEASE STATE YOUR NAME, POSITION, AND BUSINESS ADDRESS.**

2 A. My name is Joshua D. Snodgrass. My business address is 8999 Energy Road, Moundsville,
3 West Virginia 26041. I am the Plant Manager of the Mitchell Generating Station
4 (“Mitchell”, “Mitchell Plant”, or the “Plant”).

II. BACKGROUND

5 **Q. PLEASE SUMMARIZE YOUR EDUCATIONAL BACKGROUND AND**
6 **BUSINESS EXPERIENCES.**

7 A. I received a Bachelor’s degree in Accounting from Marshall University. I have been
8 employed by American Electric Power Service Corporation (“AEPSC”) for 19 years,
9 working at several different generating plants including Kanawha River, Big Sandy, John
10 Amos, and Mitchell. I have held positions of increasing responsibility within AEPSC
11 including Administrative Supervisor, Frontline Crew Supervisor, System Owner, and
12 Operations Superintendent. I started at the Mitchell Plant as an Operations Superintendent
13 and was promoted to Plant Manager in 2024.

14 **Q. WHAT ARE YOUR PRINCIPAL AREAS OF RESPONSIBILITY WITH**
15 **RESPECT TO KENTUCKY POWER?**

16 A. I am responsible for the safe, reliable, environmentally compliant, and economic operation
17 of the Mitchell Plant. Specifically, I oversee and coordinate Plant activities, including
18 operations, maintenance, engineering, and construction. I ensure the Mitchell Plant is

operating within all environmental requirements and am also responsible for the Plant budgets. I am the key interface between AEPSC, Kentucky Power Company (“Kentucky Power”), and Wheeling Power Company (“Wheeling Power”) to ensure the needs of the Mitchell Plant and the customers we serve are met.

III. PURPOSE OF TESTIMONY

Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY IN THIS PROCEEDING?

A. The purpose of my direct testimony is to:

- Provide an overview of the Mitchell Plant and plant operations;
- Provide a summary of the Effluent Limitations Guidelines (“ELG”) Project as constructed, including the estimated and actual cost; and
- Support the reasonableness of the non-ELG capital projects undertaken in order to operate the Plant beyond 2028, the costs of which have been asymmetrically allocated to Wheeling Power since September 2022.

B. ARE YOU SPONSORING ANY EXHIBITS?

A. Yes, I am sponsoring Exhibit JDS-1, which is a breakdown of the non-ELG capital costs that have been asymmetrically allocated to Wheeling Power since September 2022.

Q. WAS THIS EXHIBIT PREPARED BY YOU OR UNDER YOUR DIRECTION?

A. Yes.

IV. MITCHELL PLANT AND OPERATIONAL OVERVIEW

Q. PLEASE DESCRIBE THE MITCHELL PLANT.

A. The Mitchell Plant is comprised of two super-critical pulverized coal-fired baseload generating units located approximately 12 miles south of Moundsville, West Virginia on the Ohio River. Mitchell Unit 1 has a nameplate capacity of 770 MW, and Mitchell Unit 2 has a nameplate capacity of 790 MW for a total nameplate capacity of 1,560 MW. Both units were placed in service in 1971. Kentucky Power and Wheeling Power each own an

undivided 50% interest in the Mitchell Plant. Wheeling Power operates the Plant pursuant to the September 1, 2022 Written Consent Action of the Mitchell Operating Committee, which is described in more detail by Company Witness Wolfram.

Q. PLEASE PROVIDE AN OVERVIEW OF THE ENVIRONMENTAL CONTROLS CURRENTLY INSTALLED AT THE MITCHELL PLANT.

A. Each unit is equipped with an electrostatic precipitator for control of particulate matter, a flue gas desulfurization ("FGD") system for sulfur dioxide control, and both selective catalytic reduction technology and low-nitrogen oxide ("NO_x") burners for control of NO_x emissions. Both units also have been updated to comply with both the Coal Combustion Residuals ("CCR") Rule and the ELG Rule as discussed by Company Witness Wolfram and below in my direct testimony.

Q. PLEASE GENERALLY DESCRIBE THE UPGRADES MADE AT THE MITCHELL PLANT SPECIFICALLY TO COMPLY WITH THE CCR RULE, WHICH WERE AUTHORIZED BY THIS COMMISSION IN CASE NO. 2021-00004.

A. In order to comply with the CCR Rule, Kentucky Power and Wheeling Power removed ash from the existing ponds, over-excavated the ponds to ensure closure by removal, installed a new liner system in the footprint of the existing bottom ash pond to accept current CCR and non-CCR wastewater streams, and installed a chemical treatment system for non-CCR wastewater streams. Kentucky Power and Wheeling Power also have installed larger clinker grinders on Mitchell Unit 1 for improved bottom ash removal. Mitchell Unit 2 will receive similar upgrades during 2026. Additionally, the bottom ash handling systems were modified to no longer allow the discharge of bottom ash transport water, including the

1 installation of submerged grind conveyor systems, and a new ash bunker was installed.
2 The CCR upgrades were completed and fully in-service as of September 10, 2024.

V. ELG PROJECT, STATUS, AND COST

3 **Q. PLEASE PROVIDE A HIGH-LEVEL DESCRIPTION OF THE ELG PROJECT**
4 **INSTALLED AT THE MITCHELL PLANT.**

5 A. Company Witness Wolfram provides a brief history and explanation of the ELG Project
6 and why the ELG Project was necessary to continue operating the Mitchell Plant as a coal
7 plant after December 31, 2028. Generally, the ELG Project consists of a new FGD
8 biological treatment system with ultrafiltration, and associated supporting equipment, such
9 as valves, pumps, piping, and tanks.¹ Please see Exhibit 5 to the Company's Application
10 for as-built drawings of the ELG Project.

11 **Q. WHAT IS THE STATUS OF THE MITCHELL ELG PROJECT?**

12 A. The ELG Project was completed and fully in service as of August 5, 2024.

13 **Q. HOW HAS THE ELG PROJECT OPERATED SINCE INSTALLATION?**

14 A. The ELG Project has operated well since installation, and the Mitchell Plant has not
15 experienced any issues with the ELG Project to date. In addition, my team constantly looks
16 for ways to improve overall efficiency and reliability of individual Plant systems and the
17 Plant as a whole. Consistent with that practice, my team implemented a few modifications
18 to the ELG Project after observing how the system was running since the ELG Project was
19 placed in service. These modifications were made in order for the ELG Project to operate
20 more efficiently. For example, the Plant has added heat tracing to the air lines on the

¹ Order at 8, *In The Matter Of: Electronic Application Of Kentucky Power Company For Approval Of A Certificate Of Public Convenience And Necessity For Environmental Project Construction At The Mitchell Generating Station, An Amended Environmental Compliance Plan, And Revised Environmental Surcharge Tariff Sheets*, Case No. 2021-00004 (Ky. P.S.C. Jul. 15, 2021).

exterior of the bioreactor building, modified the hydrochloric acid tank piping to allow utilization of the entire tank product, and updated the leachate flow rate to increase the efficiency and effectiveness of the ELG Project. In addition, there have been no violations or exceedances to relevant environmental regulations at the Mitchell Plant since the installation of the ELG Project.

Q. PLEASE PROVIDE THE CURRENT CAPITAL COST OF THE ELG PROJECT.

A. The total plant capital cost for the ELG Project as of April 2025 is provided below in Figure JDS-1. Project close out activities and minor capital costs will continue through December 2025.

Figure JDS-1

Mitchell Plant ELG Project	
Capital Install	\$127,521,193
Capital Removal	\$2,216,740
Total	\$129,737,933

Q. WHAT ARE THE ESTIMATED ONGOING ANNUAL OPERATIONS & MAINTENANCE EXPENSES REQUIRED TO MAINTAIN THE ELG SYSTEM IN THE FUTURE?

A. The projected ongoing annual operations and maintenance (“O&M”) expenses required to maintain the ELG Project are shown in Figure JDS-2 for total Mitchell Plant, of which Kentucky Power would be responsible for 50%. These figures were provided to Company Witness Kahn for inclusion within the revenue requirement calculation.

Figure JDS-2- Mitchell Plant ELG Future Expenses (x\$1000)

Year	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035
Base Costs of Operation	\$250	\$250	\$250	\$250	\$250	\$250	\$250	\$250	\$250	\$250
Material Direct Purchase	\$1,000	\$1,000	\$1,000	\$1,000	\$1,000	\$1,000	\$1,000	\$1,000	\$1,000	\$1,000
Non-Outage Maintenance Improvements	\$100	\$75	\$75	\$50	\$50	\$50	\$50	\$50	\$50	\$50
Scheduled Outage O&M	\$0	\$100	\$0	\$0	\$100	\$0	\$0	\$0	\$0	\$0
Total	\$1,350	\$1,425	\$1,325	\$1,300	\$1,400	\$1,300	\$1,300	\$1,300	\$1,300	\$1,300

Q. PLEASE EXPLAIN WHAT EACH LINE ITEM IN FIGURE JDS-2 REPRESENTS.

A. The Base Cost of Operation expenses are dollars spent to perform the daily operation of the ELG equipment (cleaning supplies, training, and environmental fees). These are expenses that the Plant incurs whether or not the unit is running and are not dependent on energy production.

The Material Direct Purchase expenses are any items purchased for daily operation of the ELG equipment (e.g. pumps, tanks, wiring, and structural material for the wastewater building).

Non-Outage Maintenance Improvements expenses are dollars spent to repair and perform maintenance on ELG equipment (e.g. piping, tanks, valve repairs, and lighting).

Scheduled Outage O&M expenses are funds for items that require a unit outage to physically work on that specific ELG equipment (e.g. piping, tanks and valves).

Q. APPROXIMATELY WHAT PORTION OF THE TOTAL MITCHELL PLANT O&M BUDGET DO THESE ELG PROJECT EXPENSES COMPRISE?

A. The total annual O&M budget for the Mitchell Plant for the past five years averaged \$36.5 million per year. Based on the forecasted expenses shown in Figure JDS-2, the projected

1 annual ELG Project future O&M expenses for the next 10 years represent approximately
2 3.6% of the total annual O&M budget.

**VI. NON-ELG CAPITAL PROJECTS COMPLETED TO CONTINUE RUNNING
MITCHELL AS A COAL PLANT AFTER DECEMBER 31, 2028**

3 **Q. PLEASE DESCRIBE THE NON-ELG UPGRADES PERFORMED TO EXTEND**
4 **THE USEFUL LIFE OF AND CONTINUE TO OPERATE THE MITCHELL**
5 **PLANT AS A COAL PLANT AFTER DECEMBER 31, 2028.**

6 A. As explained by Company Witness Wolfram, in addition to the ELG upgrades, several
7 other capital projects have been completed at the Mitchell Plant since this Commission's
8 Orders in Case No. 2021-00004 and Case No. 2021-00421 that required the termination of
9 the Company's interest in the Mitchell Plant after December 31, 2028. Each of the capital
10 projects that were completed in order to extend the useful life of the Mitchell Plant past
11 2028 were allocated asymmetrically to Wheeling Power beginning in September 2022.
12 Figure JDS-3 provides a breakdown of those capital projects and the costs of the projects
13 that were allocated to Kentucky Power and to Wheeling Power. Exhibit JDS-1 provides a
14 complete breakdown of each of the projects listed in Figure JDS-3.

Figure JDS-3

		Actuals Spend through April 2025		Forecasted Additional Spend through Dec 2025	
Category	Project	Kentucky Power	Wheeling Power	Kentucky Power	Wheeling Power
CCR	Clinker Grinder Replacement U1	\$ 169,147	\$ 1,057,308	\$ 145,719	\$ 1,182,620
CCR	Clinker Grinder Replacement U2	\$ 205,765	\$ 1,367,675	\$ 19,086	\$ 154,898
Non-ELG	Burner Nozzle Replacement	\$ 574,067	\$ 3,361,058	\$ -	\$ -
Non-ELG	Lime Conversion	\$ 1,636,279	\$ 8,141,749	\$ -	\$ -
Non-ELG	Winterization	\$ 53,357	\$ 345,123	\$ -	\$ -
Non-ELG	Ovation DCS Upgrade U1	\$ 181,634	\$ 875,477	\$ -	\$ -
Non-ELG	Ovation DCS Upgrade U2	\$ 183,423	\$ 883,946	\$ -	\$ -
Non-ELG	Pump Replacements	\$ 317,226	\$ 1,838,778	\$ -	\$ -
Non-ELG	Diesel Fire Pump Replacement	\$ 125,296	\$ 745,675	\$ -	\$ -
Non-ELG	Generator Gas Baffle Purchase	\$ 124,758	\$ 887,180	\$ -	\$ -
Non-ELG	Generatory Field Out In	\$ 110,308	\$ 812,795	\$ 58,261	\$ 472,834
Non-ELG	Air Heater Basket Replacement U1	\$ 577,060	\$ 3,149,896	\$ -	\$ -
Non-ELG	Air Heater Basket Replacement U2	\$ 649,888	\$ 3,194,252	\$ -	\$ -
Non-ELG	Lower Sidewall Weld Overlay	\$ 235,085	\$ 1,149,789	\$ -	\$ -
Non-ELG	Cooling Tower Reinforce	\$ 2,455,313	\$ 16,311,029	\$ 1,739,009	\$ 14,113,401
Non-ELG	Cooling Tower Components	\$ 1,336,904	\$ 7,352,606	\$ -	\$ -
All Other	All Other Capital Investments	\$ 11,479,575	\$ 66,894,883	\$ 1,720,185	\$ 10,550,870
Removal	Removal	\$ 11,835,816	\$ 11,835,790	\$ 724,269	\$ 739,269
Total by Company		\$ 32,250,901	\$ 130,205,010	\$ 4,406,529	\$ 27,213,892
Wheeling Total Less Amounts Paid by Kentucky Power			\$ 97,954,109		\$ 22,807,363
50% (Discussed by Company Witness Wolfram)			\$ 48,977,055		\$ 11,403,682
Estimated Owed to Wheeling (Discussed by Company Witness Wolfram)					\$ 60,380,736

Q. CAN YOU DESCRIBE SOME OF THE BIGGER CAPITAL PROJECTS LISTED IN FIGURE JDS-3 AND EXHIBIT JDS-1 THAT WERE PERFORMED IN ORDER TO EXTEND THE USEFUL LIFE OF THE MITCHELL PLANT PAST 2028 AND IMPROVE OVERALL EFFICIENCY AND RELIABILITY?

A. Yes. For example, both Mitchell Units have undergone extensive cooling tower upgrades and repairs (see “Cooling Tower Reinforce” and “Cooling Tower Components” in Figure JDS-3). Cooling towers are used to aid in the transfer of steam back into condensate for the steam generator system. The existing cooling towers have been in service for over 30 years. Unit 1’s cooling tower projects included the replacement of the hot water distribution deck, louvers and louver columns along with the outer periphery longitudinal girt and associated components. 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

1 and cooling tower systems. The upgrades improved the efficiency of the cooling system,
2 overall plant efficiency, and prevent future outages needed for repairs.

3 In addition, the air heaters at the Mitchell Plant were recently replaced (“Air Heater
4 Basket Replacement U1” and “Air Heater Basket Replacement U2” in Figure JDS-3). The
5 air heater baskets on both units were beyond the typical life cycle and were beginning to
6 deteriorate exponentially. Air heaters are made up of several steel corrugated plates, which
7 over time, can deteriorate and allow fly-ash to accumulate in the air heaters plugging off
8 the air supply to the steam generators. The air heaters are used to heat the air from the
9 forced draft fans which pull ambient air from the outside into the combustion chamber of
10 the steam generator. Heating this air supply increases the efficiency of the units due to hot
11 combustion air compared to cooler combustion air. The replacement of the air heaters was
12 needed to reduce potential outages at the Mitchell Plant and to maintain the efficiency of
13 the forced draft fans.

14 As another example, improvements were made to thicken furnace walls on Mitchell
15 Unit 2 (see “Lower Sidewall Weld Overlay” in Figure JDS-3). The steam generator had
16 experienced tube wastage due to fireside corrosion which resulted in additional outage due
17 to tube leaks. Tube wastage is the result of the coal and ash abrasively rubbing against the
18 tubes reducing the metal thickness of the steam generator tubes in the lower furnace area.
19 This corrosion resulted in reduced tube wall thickness and led to outages due to tube leaks.
20 To prevent this from continuing to happen, a weld overlay using an Inconel weld was
21 performed to thicken the furnace walls. This overlay increased the resistance to corrosion
22 and increased the temperature strength of the tubing. The reduction of tube leak outages
23 in this area increases the reliability of the unit.

1 Further, both Mitchell units have undergone recent modernized equipment
2 upgrades, including burner nozzle replacement, pulverizer rebuilds, major pump
3 replacements, and upgrades to control systems for both units (see “Burner Nozzle
4 Replacement,” “Ovation DSC Upgrade U1,” and Ovation DCS Upgrade U2” in Figure
5 JDS-3). Mitchell Unit 1 also upgraded the generator gas baffles. (see “Generator Gas
6 Baffle Purchase” in Figure JDS-3). All of these upgrades improve the reliability and
7 availability of the units.

8 As a final example, all four Plant air dryers have been replaced on the two units and
9 the scrubber facility (see row 131 in Exhibit JDS-1, tab “Capital”). These air dryers dry
10 the control air which is used in the operation of the Plant valves and equipment. By
11 replacing the dryers, winterization efforts have improved because the dry air reduces the
12 chances of moisture freezing in the lines during winter months, which can cause outages
13 and curtailments. The dryers improved burner and igniter operations due to reduced
14 moisture in the lines. The Plant air compressors also went through control upgrades. These
15 upgrades allow the backup compressors to start automatically on a failure of the primary
16 compressor which prevents unit trips due to loss of plant air, which improves unit
17 availability and reliability.

1 **Q. WERE THE COSTS OF EACH OF THE NON-ELG CAPITAL PROJECTS**
2 **INCLUDED IN FIGURE JDS-3 AND EXHIBIT JDS-1 REASONABLE AND**
3 **NECESSARY FOR THE SAFE, EFFICIENT, AND RELIABLE OPERATION OF**
4 **THE MITCHELL PLANT?**

5 A. Yes. All of the costs of each project listed in Figure JDS-3 and Exhibit JDS-1 were
6 reasonable and necessary for the safe, efficient, and reliable operation of the Mitchell Plant
7 for the reasons stated herein.

VII. THE NON-ELG PROJECTS COMPLETED TO CONTINUE RUNNING
MITCHELL AS A COAL PLANT AFTER DECEMBER 31, 2028 CONTRIBUTE
TO THE SAFE, EFFICIENT, AND ENVIRONMENTALLY COMPLIANT
OPERATION OF THE MITCHELL PLANT

8 **Q. HAS THE MITCHELL PLANT OPERATED IN A SAFE, RELIABLE, AND**
9 **ENVIRONMENTALLY COMPLIANT MANNER?**

10 A. Yes. Because Kentucky Power and Wheeling Power have made the required
11 environmental upgrades, constantly maintain the Plant and its individual systems, and
12 make the appropriate necessary non-environmental capital upgrades, the Mitchell Plant
13 runs safely, reliably, and efficiently.

14 **Q. CAN YOU PROVIDE ANY METRICS BY WHICH THE MITCHELL PLANT'S**
15 **EFFICIENCY, RELIABILITY, AND SAFETY CAN BE OBJECTIVELY**
16 **MEASURED?**

17 A. Yes, for example, the Company tracks each Mitchell unit's equivalent forced outage rate
18 ("EFOR") and safety metrics like the days away, restricted, or transferred ("DART") rate,
19 and recordable injuries. EFOR is a metric that measures the reliability of a power
20 generation unit, specifically looking at the percentage of time it is unavailable due to

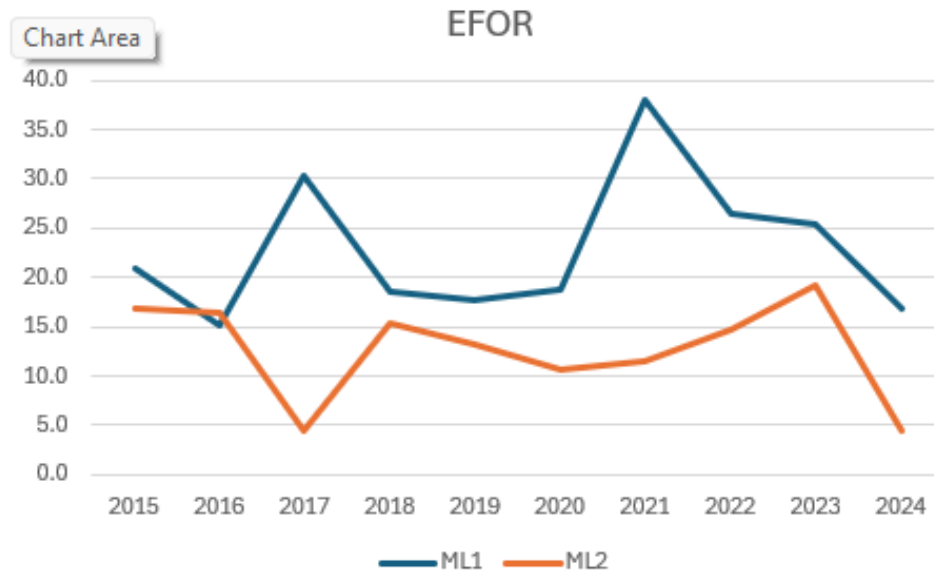
1 unplanned outages, considering only the time it is needed to meet load demands. The lower
2 the EFOR, the better.

3 The Company has implemented multiple process improvements and made various
4 capital investments designed to improve unit availability and reduce the costs to operate
5 the units.

6 **Q. HAS THE MITCHELL PLANT'S EFOR IMPROVED IN RECENT YEARS?**

7 A. Yes, both Mitchell units have operated well, and the EFOR for each unit has decreased in
8 recent years. Mitchell Unit 1 completed 2024 with a top ten historical EFOR rate since
9 coming online in 1971. Specifically, it finished 2024 with an EFOR of 16.9%. Mitchell
10 Unit 2 finished 2024 with one of its best EFOR results to date at 4.5%, as shown in Figure
11 JDS-4. Both Mitchell Plant units have been operating dependably and have been
12 maintained to meet or exceed the 2040 targeted retirement to the extent existing
13 environmental regulations permit.²

² Although there was increase in EFOR in 2021, that increase was due to an unexpected phase 1 generator step-up ("GSU") transformer failure, which caused the unit to be on an extended forced outage. The Company reacted quickly to install the new transformer and completed that installation on June 6, 2021. Mitchell Unit 1 has been operating effectively as demonstrated by the significant decrease in EFOR since 2021.

Figure JDS-4

The improvement in EFOR is directly related to capital investments that have been made at the Plant, including the capital projects to replace the air heaters and to reinforce the furnace walls described above in my direct testimony.

Q. HAVE THERE BEEN ANY OPERATIONS AND MAINTENANCE CHANGES THAT HAVE ALSO CONTRIBUTED TO THE IMPROVED EFOR ON THE UNITS?

A. Yes. On Mitchell Unit 1, the turbine rotor was replaced along with the generator gas baffles. This work involved both capital and O&M expenses. The unit precipitators have undergone internal repairs as part of an O&M expense needed based on internal inspections. The Induced Draft (“ID”) Fans and steam generator internals repairs have also contributed to the reduction in EFOR based on inspections and repairs. All of these items have reduced unexpected outages and loss of generation, which has decreased the EFOR of the unit.

1 Mitchell Unit 2 O&M improvements include precipitator internal repairs, steam
2 generator internal repairs and ID Fan hub replacement. These repairs, along with a capital
3 investment for absorber recycle pump upgrades, have all contributed to the reduction of
4 EFOR on Mitchell Unit 2 by decreasing unplanned outages and generation loss.

5 **Q. HAVE OTHER IMPROVEMENTS BEEN MADE TO INCREASE PLANT**
6 **EFFICIENCY?**

7 A. Yes. For example, Mitchell Units 1 and 2 recently switched from using trona to hydrated
8 lime as an additive for dry sorbent injection controls for SO₃, which has improved
9 operational efficiency and reduced acid dew points in the flue gas. This change allowed the
10 units to decrease their minimum generation level by approximately 30MW which means,
11 when the units are designated as must-run, the costs to must-run the units are reduced as
12 the units are operating at a lower minimum MW level as compared to when the units were
13 in must-run prior to the change. This reduction in minimum MWs also makes the units
14 more economic when energy prices are low as the units are generally cheaper to run.

15 **Q. WHAT MEASURES HAVE BEEN TAKEN TO ENHANCE SAFETY**
16 **PERFORMANCE AT THE MITCHELL PLANT?**

17 A. Our team prioritizes asset preservation to safeguard plant operations and the environment.
18 As an example, recently the Mitchell Plant's diesel fire pump and a large portion of fire
19 piping within the Plant were replaced. These critical upgrades not only enhance safety but
20 ensure that assets are well-protected against potential risks impacting reliability. Safety
21 considerations are first and foremost at the Plant. Every meeting starts with a safety
22 discussion and each job is reviewed for potential hazards. The Mitchell Plant finished 2024
23 with a zero DART rate and zero recordable injuries. This shows the commitment to safety

1 at the Mitchell Plant. This safety commitment ensures employees are available and
2 working safely to make the units run as efficiently as possible to the benefit of our
3 customers.

VIII. CONCLUSION

4 **Q. CAN YOU DESCRIBE THE BENEFIT OF ALL THE UPGRADES DESCRIBED**
5 **IN YOUR TESTIMONY TO CUSTOMERS SERVED BY THE PLANT?**

6 A. Yes. As detailed above, the Plant has undertaken multiple projects and initiatives to
7 improve reliability, availability, and reduce the costs to operate both units, which ultimately
8 benefit customers served by the Plant, including Kentucky Power customers. This is
9 represented most specifically in the reduction in EFOR as shown Figure JDS-4. My team
10 has a continued focus on improving performance and ensuring that the Mitchell Plant is
11 providing service at the lowest reasonable cost to customers. Overall, the Plant has and
12 will continue to provide safe and reliable service to customers now and into the future.

13 **Q. DOES THIS CONCLUDE YOUR DIRECT TESTIMONY?**

14 A. Yes, it does.

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 testimony and the information contained therein is true and correct to the best of his information, knowledge, and belief after reasonable inquiry.

Signed by:

Joshua D. Snodgrass

~~7D9A0AE0F5B440A...~~
Joshua D. Snodgrass

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 **Joshua D. Snodgrass**, on 6/26/2025 | 10:03 AM EDT .

Signed by:

Michelle Caldwell

E9B1BC7AC31F421...
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