

Kentucky Power Company
KPSC Case No. 2025-00257
Commission Staff's Second Set of Data Requests
Dated September 24, 2025
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DATA REQUEST

KPSC 2_29 Refer to the Wolfram Direct Testimony, page 38, regarding the Turbine Reservation Fee.

- a. State whether the Turbine Reservation Fee acts as a deposit to be applied to the balance of the turbine purchase or if it is an additional cost on top of the cost of the turbine.
- b. Provide a copy of the reservation contract.
- c. State whether the Turbine Reservation Fee was a requirement for contracting with the vendor.
- d. Explain why the Turbine Reservation Fee was a necessary expenditure.

RESPONSE

- a. Yes, the Turbine Reservation Fee acts as a deposit and will be applied to the balance of the total equipment costs.
- b. The Company is seeking an extension of time to produce this document until October 17, 2025.
- c. No, the Turbine Reservation Fee was not a requirement to contract with vendor. However, given the demand for generation resources across the country, not securing the manufacturing slot at this time would result in the Company not being able to place the new generating facility into service by 2031.
- d. The Company is executing its plan to address its winter capacity needs per the Commission's directives, and based on the expectation that PJM is evaluating and expected to implement a winter capacity requirement in the coming year. In order to meet the Company's winter capacity requirements, the Company needs to add generation. The Company estimates that it will need between 250-280 MW (depending on the PJM Planning Year) of winter capacity going forward, assuming the Mitchell Plant remains in the Company's generation portfolio past 2028. The new 450MW CT, for which the turbine has been reserved, would allow the Company to fully cover its winter capacity requirement and would provide some additional capacity length to serve new load in the

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future. Given these benefits, as explained in subpart (c) above, it was necessary for the Company to pay the reservation fee for the new turbines so that the new plant can be

placed into service by 2031. If the Company had not made the reservation and paid the reservation fee, then the new plant's in-service date would be further delayed, and the Company would likely have to make additional investments to cover its winter capacity needs until the new plant could become operational.

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b. Please see KPCO_SR_KPSC_2_29_ConfidentialSupplementalAttachment1.

Witness: Tanner S. Wolfram

KPCO_SR_KPSC_2_29_ConfidentialSupplementalAttachment1 is redacted in
its entirety.

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DATA REQUEST

- KPSC 2_86** Refer to the Carlin Direct Testimony generally. Provide the following information for Kentucky Power's executive staff employees, as well as all executive staff employees whose costs are allocated to Kentucky Power and separate each response by company/utility.
- a. Provide the position, title, and salary for each executive staff employee for the years 2020-2025
 - b. Provide the average raise that the executive staff employees received, or will receive, for the years 2020–2025. Ensure to explain whether the annual raise is directly connected to a performance review.
 - c. Provide the average bonus that each executive staff employee received, or will receive, for the years 2020–2025
 - d. Provide all awards given to the executive staff employees for the years 2020–2025.
 - e. Provide all vehicle allowances given to the executive staff employees for the years 2020-2025.
 - f. Provide all incentive compensation given to the executive staff employees for the years 2020–2025.
 - g. Provide the average raise, if any, which will be given to executive staff employees for 2025.
 - h. Provide a detailed explanation of the insurance benefits provided to Kentucky Power's executive staff employees, including but not limited to health, dental, vision, life insurance, etc. Include all premiums paid by Kentucky Power or its parent company on the executive staff employees' behalf, as well as copays, deductibles, and maximum out of pocket amounts.
 - i. Provide a detailed explanation of retirement benefits provided to Kentucky Power's executive staff employees, including but not limited to, whether there is a defined benefit plan, 401(k) matching, etc.

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j. Explain whether any of the executive staff employees are members of a union.

RESPONSE

The Company is seeking an extension of time to respond to this request until October 17, 2025.

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Because the term “executive staff” is not defined, the Company interprets this term to be the same as “executive officer”, as defined under section 16 of the Securities and Exchange Act.

a.-g. Please see KPCO_SR_KPSC_2_86_ConfidentialSupplementalAttachment1. All 2025 executive salary increases have already occurred and no executive officers are expected to receive a salary increase during the remainder of the year.

d. Because incentive compensation and bonuses are separately requested in this question the term “awards” is presumed to refer to long-term incentive compensation, the value of which has been provided at the time the award is paid (in shares) or deferred.

e. No vehicle allowances were provided to any employees during the period requested.

h. The Companies offer the same health, dental, vision and basic (i.e., company paid) life and AD&D insurance benefits at the same employee and employer cost to executive officers as it offers to all other employees. Please see EXHIBIT ARC-8 - 2025 Health and Welfare Benefit Summary and EXHIBIT ARC-9 - Employer & Employee Contribution Rates for detailed descriptions of these benefits and their employer and employee costs. The Companies provide two times base salary group term life insurance benefits for employees who were hired prior to January 1, 2020, and one times base salary for those who were hired after January 1, 2020.

i. Executive officers participate in the same tax-qualified defined benefit pension plan, defined contribution savings plan and, if eligible, retiree medical benefits on the same terms as other eligible employees as described in KPCO_R_KPSC_1_46_Attachment1. By way of additional background and detail, the Company states as follows:

Employees who are at least age 50 with 10 years of AEP service who were hired or last rehired prior to January 1, 2014 qualify for retiree medical benefits.

They also participate in the Company's non-qualified retirement benefit plans, which provide the named executive officers and other qualifying employees with benefits that would otherwise be provided through the tax-qualified plans but for IRS limits. This allows the named executive officers to accumulate replacement income based on the same benefit formulas as the tax-qualified plans, but without the limitations imposed by the Internal Revenue Code on tax-qualified plans. As with other newly hired employees, executive officers do not become eligible to participate in the Company's tax-qualified and non-qualified defined benefit pension plans until he or she completes one year of AEP service. The Company provides these benefits as part of a market competitive total rewards package.

The Company limits the types of compensation included in the qualified and non-qualified retirement plans because the HR Committee and AEP management believe that certain types of compensation should not be further enhanced by including them in retirement benefit calculations.

Therefore, long-term incentive compensation is not included in the calculations that determine retirement and other benefits under AEP's benefit plans.

AEP maintains tax-qualified and nonqualified defined benefit pension plans for eligible employees. The nonqualified plans provide benefits that cannot be paid under the tax-qualified plan because of limitations imposed on such plans by the Internal Revenue Code. The plans are designed to provide a retirement income to executives and their spouses, as well as a market competitive benefit opportunity as part of a market competitive total rewards package.

The retirement plans available to eligible AEP employees, including executive officers, are described below:

AEP Retirement Plan. The AEP Retirement Plan is a tax-qualified defined benefit pension plan under which benefits are generally determined by reference to a cash balance formula. In addition, employees who have continuously participated in the AEP Retirement Plan since December 31, 2000 ("Grandfathered AEP Participants") remain eligible for an alternate pension benefit calculated by reference to a final average pay formula. The benefits under this final average pay formula were frozen as of December 31, 2010.

Cash Balance Formula. Under the cash balance formula, each participant has an account established to which dollar credits are allocated each year. Each year, participants' accounts are credited with an amount equal to a percentage of their salary and annual incentive award paid to them during the year. The applicable percentage is based on the participant's age and years of service. The following table shows the applicable percentage:

Sum of Age Plus Years of Service	Applicable Percentage
Less than 30	3.0%
30-39	3.5%
40-49	4.5%
50-59	5.5%
60-69	7.0%
70 or more	8.5%

Each year, the IRS calculates a limit on the amount of eligible pay that can be used to calculate pension benefits in a qualified plan. For 2024, the limit was \$345,000.

All amounts in the cash balance accounts earn interest at the average interest rate on 30-year Treasury securities for the month of November of the prior year, with a floor of 4 percent.

Final Average Pay Formula. Grandfathered AEP Participants receive their benefits under the cash balance formula or the final average pay formula, whichever provides the higher benefit. On December 31, 2010, the final average pay benefit payable at the Grandfathered AEP Participant's normal retirement age was frozen, meaning that their final average pay formula benefit is not affected by the participant's service or compensation subsequent to this date. This frozen final average pay normal retirement benefit is based on the following calculation as of December 31, 2010: the participant's then years of service multiplied by the sum of (i) 1.1 percent of the participant's then high 36 consecutive months of base pay (High 36); and (ii) 0.5 percent of the amount by which the participant's then High 36 exceeded the participant's applicable average Social Security covered compensation.

Grandfathered AEP Participants may become entitled to a subsidized early retirement benefit under the final average pay formula if they remain employed with AEP through age 55. The early retirement benefit payable under the final average pay formula is the unreduced normal retirement benefit if it commences at age 62 or later. The early retirement benefit is reduced by 0.25 percent for each month prior to age 62 that the participant elects to commence their benefits.

AEP Supplemental Benefit Plan. The AEP Supplemental Benefit Plan is a non-qualified defined benefit pension plan. It generally provides eligible participants with benefits that are in excess of those provided under the AEP Retirement Plan as determined upon the participant's termination of employment. These excess benefits are calculated under the terms of the AEP Retirement Plan described above with the following modifications: (i) annual incentive pay was taken into account for purposes of the frozen final average pay formula; and (ii) the limitations imposed by the Internal Revenue Code on annual compensation and annual benefits are disregarded.

Participants do not become vested in their AEP Supplemental Plan benefit until they become vested in their AEP Retirement Plan benefit or upon a change in control.

The Supplemental Retirement Savings Plan (SRSP). AEP maintains the SRSP; a non-qualified deferred compensation plans that allows eligible employees, including executive officers, to defer receipt of a portion of their base salary and annual incentive compensation. This plan is unfunded. Participants have an unsecured contractual commitment from the Company to pay the amounts due under this plan from the general assets of the Company. This plan allows eligible participants to save on a pre-tax basis and to continue to receive Company matching contributions beyond the limits imposed by the Internal Revenue Code on qualified plans of this type. Participants can defer up to 50 percent of their base salary and annual incentive award in excess of the IRS eligible compensation limit for qualified plans, which was \$345,000 for 2024. The Company matches 100 percent of the participant's contributions up to 1 percent of eligible compensation and 70 percent of the participant's contributions from the next 5 percent of eligible compensation for a total Company match of up to 4.5% of eligible compensation. Participants may not withdraw any amount credited to their account until their termination of employment with AEP. Participants may elect a distribution of their account as a lump-sum or annual installment payments over a period of up to 10 years. Participants may delay the commencement of distributions for up to five years from the date of their termination of employment. Participants may direct the investment of their plan account among the core investment options that are available to all employees in AEP's qualified Retirement Savings Plan and one additional option that provides interest at a rate reset effective each January 1 at 120 percent of the applicable federal long-term rate with monthly compounding for the immediately preceding December. There are not any above-market or preferential earnings with respect to the Supplemental Retirement Savings Plan's investment options.

j. No executive staff is a member of a union.

Witness: Andrew R. Carlin

KPCO_SR_KPSC_2_86_ConfidentialSupplementalAttachment1 is redacted in
its entirety.

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DATA REQUEST

- KPSC 2_87** Refer to the Carlin Direct Testimony generally. Provide the following information for Kentucky Power's salaried employees, as well as all salaried employees whose costs are allocated to Kentucky Power and separate each response by company/utility.
- a. Provide the position, title, and salary for each salaried employee for the years 2020–2025
 - b. Provide the average raise that the salaried employees received, or will receive, for the years 2020–2025. Explain whether the annual raise is directly connected to a performance review.
 - c. Provide the average bonus that each salaried employee received, or will receive, for the years 2020–2025
 - d. Provide all awards given to the salaried employees for the years 2020–2025.
 - e. Provide all vehicle allowances given to the salaried employees for the years 2020–2025.
 - f. Provide all incentive compensation given to the salaried employees for the years 2020–2025.
 - g. Provide the average raise, if any, which will be given to salaried employees for 2025.
 - h. Provide a detailed explanation of the insurance benefits provided to Kentucky Power's salaried employees, including but not limited to health, dental, vision, life insurance, etc. Include all premiums paid by Kentucky Power or its parent company on the salaried employees' behalf, as well as copays, deductibles, and maximum out of pocket amounts.
 - i. Provide a detailed explanation of retirement benefits provided to Kentucky Power's salaried employees, including but not limited to, whether there is a defined benefit plan, 401(k) matching, etc.
 - j. Explain whether any of the salaried employees are members of a union.

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RESPONSE

The Company is seeking an extension of time to respond to this request until October 17, 2025.

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a.-g. The Companies' general ledger system, which maintains the records of costs allocated to Kentucky Power, does not store information related to individual employees. Therefore, other than for Kentucky Power employees, Wheeling Power Company and AEPSC employees assigned to the Mitchell Plant, and certain executive officers, whose costs can be assumed to be charged to Kentucky Power, information regarding the specific individual employees' whose costs were allocated to Kentucky Power is not available.

a.-b. Please see KPCO_SR_KPSC_2_87_ConfidentialSupplementalAttachment1.

b. The Companies provides base pay increases over the course of a year for multiple reasons, including annual merit-based pay increases for employees on the merit-based pay plan, internal and external equity adjustments, opportunity promotions, annual general wage increases for employees not on the merit plan, step progressions and line of progression promotions for physical and craft employees based on accumulated experience and/or other requirements, and step-up pay rate changes. This may result in more than one increase for some employees during a year. No base pay increases are available to employees whose performance review does not warrant an increase based on their performance review, so all base pay increases for these employees are based on performance reviews. Step progressions, line of progression promotions and opportunity promotions for employees who are not on the merit pay plan are also tied to performance because the employee must complete the requirements and meet the standards to be eligible for step progressions and line of progression promotions and because they must be the best available candidate to be selected for opportunity promotions.

c.-f. Please see KPCO_SR_KPSC_2_87_ConfidentialSupplementalAttachment2.

d. Because incentive compensation and bonuses are separately requested in this question the term "awards" is presumed to refer to long-term incentive compensation, the value of which has been provided at the time the award is paid (in shares) or deferred.

e. No vehicle allowances were provided to any employees during the period requested.

h.-i. Please see the response to KPSC 2_86 h. and i and
KPCO_R_KPSC_1_46_Attachment1.

j. No salaried employees are a member of a union.

Witness: Andrew R. Carlin

KPCO_SR_KPSC_2_87_ConfidentialSupplementalAttachment1 is redacted in its entirety.

KPCO_SR_KPSC_2_87_ConfidentialSupplementalAttachment2 is redacted in
its entirety.

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DATA REQUEST

- KPSC 2_88** Refer to the Direct Testimony generally. Provide the following information for Kentucky Power's non-salaried employees, as well as all non-salaried employees whose costs are allocated to Kentucky Power and separate each response by company/utility.
- a. Provide the position, title, and salary for each non-salaried employee for the years 2020–2025
 - b. Provide the average raise that the non-salaried employees received, or will receive, for the years 2020–2025. Ensure to explain whether the annual raise is directly connected to a performance review.
 - c. Provide the average bonus that each non-salaried employee received, or will receive, for the years 2020–2025
 - d. Provide all awards given to the non-salaried employees for the years 2020–2025.
 - e. Provide all vehicle allowances given to the non-salaried employees for the years 2020–2025.
 - f. Provide all incentive compensation given to the non-salaried employees for the years 2020–2025.
 - g. Provide the average raise, if any, which will be given to non-salaried employees for 2025.
 - h. Provide a detailed explanation of the insurance benefits provided to Kentucky Power's non-salaried employees, including but not limited to health, dental, vision, life insurance, etc. Ensure to include all premiums paid by Kentucky Power or its parent company on the non-salaried employees' behalf, as well as copays, deductibles, and maximum out of pocket amounts.
 - i. Provide a detailed explanation of retirement benefits provided to Kentucky Power's non-salaried employees, including but not limited to, whether there is a defined benefit plan, 401(k) matching, etc.

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j. Explain whether any of the non-salaried employees are members of a union.

RESPONSE

The Company is seeking an extension of time to respond to this request until October 17, 2025.

October 17, 2025 Supplemental Response

a.-i. Please see the Company's response to KPSC 2_87.

j. Union membership of non-salaried employees is identified in KPCO_R_KPSC_2_87_Confidential_Attachment1 and KPCO_R_KPSC_2_87_Confidential_Attachment2.

Witness: Andrew R. Carlin

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DATA REQUEST

- KPSC 2_93** Refer to the Wolfram Direct Testimony, page 6, lines 3–5 and 7–10.
- a. Confirm whether the equipment costs used were embedded costs or marginal costs.
 - b. Confirm that no equipment was double counted in the analysis. If the equipment was double counted, explain and reconcile the discrepancy.
 - c. Provide a class COSS utilizing the minimum-system method in place of the zero-intercept method.

RESPONSE

- a. The equipment costs were embedded costs.
- b. Confirmed.
- c. The Company will provide the requested analysis using the minimum-system method in place of the zero-intercept method, but to develop such analysis is a lengthy process that exceeds the amount of time allotted to respond to Commission Staff's Second Set of Discovery Requests. The Company expects that it can provide such response no later than October 17, 2025.

The Company also notes that both the minimum-system and zero-intercept methods are appropriate, and the National Association of Regulatory Utility Commissioners takes the position that the zero-intercept study tends to provide more accurate results. The Company has proposed the zero-intercept study in part due to its reliability and in part due to the Commission's directive in a previous case.¹

¹ Order at 53, 55, *In The Matter Of: Electronic Application Of Kentucky Power Company For (1) A General Adjustment Of Its Rates For Electric Service; (2) Approval Of Tariffs And Riders; (3) Approval Of Accounting Practices To Establish Regulatory Assets And Liabilities; (4) Approval Of A Certification Of Public Convenience And Necessity; And (5) All Other Required Approvals And Relief*, Case No. 2020-00174 (Ky. P.S.C. Jan. 13, 2021).

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c. Please see KPCO_SR_KPSC_2_93_SupplementalAttachment1 and KPCO_SR_KPSC_2_93_SupplementalAttachment2 for the requested information.

Witness: Nicole M. Coon (c)

Witness: John Wolfram (a-c)

VERIFICATION

The undersigned, Andrew R. Carlin, being duly sworn, deposes and says he is the Director of Compensation and Executive Benefits, 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.

Andrew R. Carlin

Andrew R. Carlin

^{DP}
State of Ohio)
County of Franklin)

Case No. 2025-00257

Subscribed and sworn to before me, a Notary Public in and before said County and State, by Andrew R. Carlin, on October 15, 2025.

Donna J. Stephens
Notary Public

My Commission Expires January 4, 2029

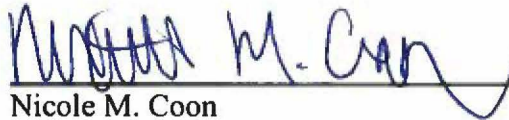
Notary ID Number _____



DONNA J STEPHENS
NOTARY PUBLIC
STATE OF OHIO
Comm. Expires
01-04-2029

VERIFICATION

The undersigned, Nicole M. Coon, being duly sworn, deposes and says she is a Regulatory Consultant Principal for American Electric Power Service Corporation, 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.



Nicole M. Coon

State of Ohio)
)
County of Franklin)

Case No. 2025-00257

Subscribed and sworn to before me, a Notary Public in and before said County and State, by Nicole M. Coon, on October 16, 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. 2025-00257

Subscribed and sworn to before me, a Notary Public in and before said County
and State, by Tanner S. Wolfram, on October 16, 2025.

Marilyn Michelle Caldwell
Notary Public

My Commission Expires May 5, 2027

Notary ID Number KYNP71841

