Kentucky Power Company
KPSC Case No. 2025-00267
Commission Staff's First Set of Data Requests
Dated September 23, 2025

DATA REQUEST

KPSC 1_1 Prepare a summary schedule showing the calculation of E(m) and the surcharge factor for the expense months under review. ES Form 1.00 and 1.10 can be used as a model for this summary. Include the two expense months subsequent to the review period that is the subject of this proceeding in order to show the over- and under-recovery adjustments for the months included for of the period under review. Include a calculation of any additional over- or under-recovery amount Kentucky Power believes needs to be recognized for the two-year review. Provide the schedule and all supporting calculations and documentation in Excel spreadsheet format with all formulas, columns, and rows unprotected and fully accessible.

RESPONSE

Please see KPCO_R_KPSC_1_1_Attachment1 for the requested information.

Witness: John D. Cullop

Kentucky Power Company
KPSC Case No. 2025-00267
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DATA REQUEST

KPSC 1_2 The net gain or loss from sulfur dioxide and nitrogen oxide emission allowance sales is reported on ES Form 3.00, Calculation of Current Period Revenue Requirement, Third Component and Second Component. For the last six expense months of the two-year period under review, provide an explanation of how the gain or loss reported in the expense month was calculated and describe the transaction(s) that was the source of the gain or loss.

RESPONSE

There were no gains or losses from sulfur dioxide or nitrogen dioxide emission allowance sales in the last six months of the two-year review period.

Witness: John D. Cullop

DATA REQUEST

KPSC 1_3 Refer to ES Form 3.13 and 3.10, Mitchell Environmental Costs for each of the last six expense months of the two-year period under review. Explain the reason(s) for any change in the expense levels from month to month if that change is greater than plus or minus 10 percent for each of the following operating and maintenance costs listed:

a. Line 22 Monthly Disposal (5010000)

b. Line 24 Monthly Urea Expense (5020002)

c. Line 25 Monthly Trona Expense (5020003)

d. Line 26 Monthly Lime Stone Expense (5020004)

e. Line 27 Monthly Polymer Expense (5020005)

f. Line 28 Monthly Lime Hydrate Expense (5020007)

g. Line 29 Monthly WV Air Emission Fee

h. Line 35 Monthly FGD Maintenance Expense

i. Line 36 Monthly Non-FGD Maintenance Expense

RESPONSE

a. Monthly Disposal. Monthly disposal expense reflects revenues derived from sales of gypsum to the neighboring wallboard plant. The variations during the review period reflect monthly changes in the wallboard plant's demand for gypsum from the Mitchell generating station.

b & d. Urea and Limestone. Usage of urea and limestone at Mitchell varies directionally (but not necessarily directly) with changes in the level of plant operation, including variations resulting from outages and deratings. For example, no net generation occurred at Mitchell Unit 2 in Oct 2023, Mitchell Unit 1 Oct-Nov 2023, Mitchell Unit 1 May 2024, Mitchell Unit 2 Sep 2024, and Mitchell Unit 1 Mar-May 2025 which reduced urea and limestone expenses during those months.

c, e, & f. Trona, Lime Hydrate, and Polymer. Trona, lime hydrate, and polymer are expensed upon delivery to the plant. The monthly variations in these consumable expenses reflect the monthly variations in the deliveries of those three consumables to the plant.

g. Air Emission Fees. Kentucky Power receives an invoice for West Virginia Department of Environmental Protection air emission fees once annually and includes 1/12 of the annual total in each monthly filing. The invoices were booked to the general ledger in July of each year.

h & i. Maintenance Expense. The monthly variations in maintenance expense result primarily from variation in maintenance activities at the plant. Plant management makes maintenance decisions to ensure the safe, reliable, and compliant operation of the Mitchell Plant.

More specifically, FGD maintenance events during the review period that led to monthly variability included:

Year - Month	FGD Equipment Maintenance	Sum of Act $
2025 - (05) May	DEWATERING HYDROCLONE B, FGD	$ 34,756
2025 - (05) May	FAN, ID #1 U2	$ 34,380
2025 - (04) Apr	ABS DUCT WORK	$ 59,095
2025 - (04) Apr	DEWATERING HYDROCLONE B, FGD	$ 52,952
2025 - (03) Mar	PUMP, CENTRIFUGAL, RECLAIM WATER	$ 43,360
2025 - (03) Mar	ABS RECYCLE PUMP	$ 32,824
2025 - (03) Mar	DEWATERING HYDROCLONE B, FGD	$ 28,594
2025 - (02) Feb	BALL MILL A SLURRY PUMP A1, FGD	$ 44,743
2024 - (12) Dec	PUMP, CENTRIFUGAL, RECLAIM WATER	$ 34,547
2024 - (10) Oct	ABSORBER RECYCLE PUMP 2E SUCTION VALVE, FGD, AR	$ 81,491
2024 - (09) Sep	ABSORBER RECYCLE PUMP 2E SUCTION VALVE, FGD, AR	$ 49,330
2024 - (09) Sep	ABSORBER RECYCLE PUMP 2C, FGD, AR	$ 29,345
2024 - (09) Sep	ABS WFGD AGITATOR	$ 26,797
2024 - (04) Apr	ABS DUCT WORK	$ 39,224
2023 - (11) Nov	FAN, ID #2 U1	$ 76,556
2023 - (10) Oct	FAN, ID #2 U1	$ 75,359
2023 - (10) Oct	ABS DUCT WORK	$ 38,904
2023 - (10) Oct	AUX TRANSFORMERS 138 KV PRIMARY FGD	$ 33,040
2023 - (10) Oct	FAN, ID #2 U2	$ 31,880
2023 - (09) Sep	FAN, ID #2 U1	$ 69,935

Similarly, for non-FGD Maintenance expenses, expenses varied in connection with changes in maintenance activity. Additional maintenance events during the review period that led to monthly variability included:

Year - Month	Non-FGD Equipment Maintenance	Amount (Approx.)
2025 - (06) Jun	WASTE WATER TREATING SYSTEM	$ 85,377
2025 - (05) May	PRECIPITATOR BOX NO1 U1	$ 76,939
2025 - (04) Apr	PRECIPITATOR BOX NO1 U1	$ 257,555
2025 - (04) Apr	SCR CATALYST	$ 84,242
2025 - (03) Mar	PRECIPITATOR BOX NO1 U1	$ 52,879
2025 - (02) Feb	PRECIPITATOR ELECTRICAL CONTROLS MISC U2	$ 258,447
2025 - (02) Feb	ABSORBER RECYCLE PUMP 2F MOTOR, FGD, AR	$ 35,020
2025 - (01) Jan	PRECIPITATOR ELECTRICAL CONTROLS MISC U2	$ 82,807
2024 - (10) Oct	PRECIPITATOR BOX NO4 U2	$ 89,246
2024 - (09) Sep	PRECIPITATOR BOX NO4 U2	$ 163,605
2024 - (05) May	PRECIPITATOR BOX NO1 U1	$ 141,222
2024 - (04) Apr	PRECIPITATOR BOX NO3 U2	$ 126,423
2024 - (04) Apr	BOTTOM ASH DISPOSAL SYSTEM CONTROLS U1	$ 55,087
2024 - (04) Apr	BOTTOM ASH DISPOSAL SYSTEM CONTROLS U2	$ 53,670
2023 - (11) Nov	PRECIPITATOR BOX NO1 U1	$ 108,701
2023 - (11) Nov	SCR DUCTS	$ 53,228
2023 - (10) Oct	PRECIPITATOR BOX NO1 U1	$ 42,242
2023 - (10) Oct	SCR DUCTS	$ 32,941
2023 - (09) Sep	BOTTOM ASH PIPE NO2 U1	$ 44,225
2023 - (09) Sep	PRECIPITATOR BOX NO1 U1	$ 34,932

Witness: John D. Cullop

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DATA REQUEST

KPSC 1_4 Refer to ES Form 3.11, 3.12, and 3.40 for last six expense months of the two-year period under review covered by the billing periods under review.

a. For the last six expense months in the two-year review period, provide the calculation that supports the total cost of allowances consumed that is then carried to ES Form 3.13 and 3.10.

b. Provide an explanation and the reasons for any fluctuations greater than plus or minus 10 percent in the monthly average cost of allowances determined in 4a.

RESPONSE

a. Please see KPCO_R_KPSC_1_4_Attachment1 for the requested information.

b. There were no fluctuations greater than plus or minus 10% in the monthly average cost of allowances during the last six expense months of the two-year review period.

Witness: John D. Cullop

Kentucky Power Company
KPSC Case No. 2025-00267
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Dated September 23, 2025

DATA REQUEST

KPSC 1_5 Provide the average residential customer's monthly usage as of April 30, 2025. Based on this usage amount, provide the dollar impact any over- or under-recovery will have on the average residential customer's bill for the recovery periods. Provide the schedule and all supporting calculations and documentation in Excel spreadsheet format with all formulas, columns, and rows unprotected and fully accessible.

RESPONSE

The 12-month average residential customer's monthly usage as of April 30, 2025 was 1,228 kWh.

The Company is not proposing any over- or under-recovery adjustments to the environmental costs for the review period in this proceeding, and therefore there are no impacts.

Witness: John D. Cullop

VERIFICATION

The undersigned, John D. Cullop, being duly sworn, deposes and says he is the Regulatory Consultant Senior 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.

John D. Cullop

Commonwealth of Kentucky)
) Case No. 2025-00267
County of Boyd)

Subscribed and sworn to before me, a Notary Public in and before said County and State, by John D. Cullop, on 10/14/2025.

Notary Public

My Commission Expires May 5, 2027

Notary ID Number KYNP71841

MARILYN MICHELLE CALDWELL
Notary Public
Commonwealth of Kentucky
Commission Number KYNP71841
My Commission Expires May 5, 2027