

**COMMONWEALTH OF KENTUCKY**  
**BEFORE THE PUBLIC SERVICE COMMISSION**

In the Matter of:

AN ELECTRONIC EXAMINATION OF THE	)	
APPLICATION OF THE FUEL ADJUSTMENT	)	
CLAUSE OF KENTUCKY POWER COMPANY	)	Case No. 2025-00338
FROM NOVEMBER 1, 2022 THROUGH	)	
OCTOBER 31, 2024	)	

**DIRECT TESTIMONY OF**  
  
**DAVID L. MELL**  
  
**ON BEHALF OF KENTUCKY POWER COMPANY**

**DIRECT TESTIMONY OF  
DAVID L. MELL ON BEHALF OF  
KENTUCKY POWER COMPANY  
BEFORE THE PUBLIC SERVICE COMMISSION OF KENTUCKY**

**CASE NO. 2025-00338**

**TABLE OF CONTENTS**

<b><u>SECTION</u></b>	<b><u>PAGE</u></b>
I. INTRODUCTION .....	1
II. BACKGROUND .....	1
III. PURPOSE OF TESTIMONY .....	2
IV. BIG SANDY EXTENDED PLANNED AND MAINTENANCE OUTAGES .....	2
V. CONCLUSION .....	4

**DIRECT TESTIMONY OF  
DAVID L. MELL ON BEHALF OF  
KENTUCKY POWER COMPANY  
BEFORE THE PUBLIC SERVICE COMMISSION OF KENTUCKY**

**CASE NO. 2025-00338**

**I. INTRODUCTION**

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

2   A.   My name is David L Mell, and my business address is Big Sandy Power Plant, 2300 US  
3       23, Louisa, Kentucky 41230. I am the Plant Manager at Kentucky Power Company, Big  
4       Sandy Plant.

**II. BACKGROUND**

5   **Q.   PLEASE   DESCRIBE   YOUR   EDUCATIONAL   AND   PROFESSIONAL**  
6       **BACKGROUND.**

7   A.   I have a Bachelor of Science in Mechanical Engineering Degree from The Ohio State  
8       University. I also have a Master of Science Degree in Engineering Management from  
9       Marshall University and am a Professional Engineer in the State of Ohio.

10       I have been employed by Kentucky Power at the Big Sandy Plant for 38 years.

11   **Q.   WHAT ARE YOUR PRINCIPAL AREAS OF RESPONSIBILITY WITH**  
12       **KENTUCKY POWER?**

13   A.   I am responsible for the safe, reliable, environmentally compliant, and economic operation  
14       of the Big Sandy Plant. Specifically, I oversee and coordinate Plant activities, including  
15       operations, maintenance, engineering, and construction. I ensure the Big Sandy Plant  
16       operates within all environmental requirements and am also responsible for the Plant  
17       budget. I am the key interface between AEPSC and Kentucky Power Company

1 (“Kentucky Power”), to ensure the needs of the Big Sandy Plant and the customers we  
2 serve are met.

3 **Q. HAVE YOU PREVIOUSLY TESTIFIED IN ANY REGULATORY**  
4 **PROCEEDINGS?**

5 A. Yes, I have previously testified before the Public Service Commission of Kentucky  
6 ("Commission") in Kentucky Power's previous two-year fuel adjustment clause hearings  
7 (Case No. 2021-00053 and 2023-00008), and sponsored discovery responses in the  
8 following fuel adjustment clause cases (Case Nos. 2025-00267, 2024-00136, 2024-00144,  
9 2021-00292, 2021-00053, 2020-00245, 2020-00004, and 2019-00226).

### **III. PURPOSE OF TESTIMONY**

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

11 A. My testimony describes the Planned and Maintenance Outages at the Big Sandy Plant that  
12 lasted longer than the original outage end date from November 1, 2022, through October  
13 31, 2024 (“Review Period”). Further, I will discuss the actions taken by Kentucky Power  
14 to address and remedy the factors that extended the outages, and to minimize each  
15 extension duration.

### **IV. BIG SANDY EXTENDED PLANNED AND MAINTENANCE OUTAGES**

16 **Q. PLEASE DESCRIBE KENTUCKY POWER’S PRACTICES GENERALLY WITH**  
17 **RESPECT TO OPERATING AND MAINTAINING BIG SANDY PLANT?**

18 A. The Company utilizes a robust inspection and Circular Letter Program established by  
19 American Electric Power’s Corporate Engineering Group. The Circular Letter Program  
20 is a very detailed, written set of requirements and recommendations for how to operate  
21 and maintain each generating unit focusing on critical equipment. Each generating plant

1 strongly adheres to the Circular Letter Program and is audited to ensure adherence. The  
2 Circular Letter Program, for example, spells out required inspection and replacement  
3 intervals for critical equipment based on industry standards, Original Equipment  
4 Manufacturer's recommendations, past experience and expertise. This enables the  
5 generating plants to plan several years in advance for planned outage scopes to maintain  
6 or improve generating unit availability.

7 The Company's inspection and maintenance practices allow for not only known  
8 issues to be addressed and resolved, but also for discovery of potential issues not  
9 previously known. The nature of the operation of generating units brings occasional  
10 mechanical issues and early detection of these issues allows the Company to resolve them  
11 in a more timely manner.

12 **Q. PLEASE EXPLAIN THE DIFFERENT TYPES OF OUTAGES OR REASONS**  
13 **THAT MAY RESULT IN A UNIT NOT RUNNING.**

14 **A.** Below are the types of outages that a generating unit can experience:

- 15 • A Planned Outage is an outage lasting several weeks to perform work on major  
16 equipment groups that is not promptly required for the safe operation of the  
17 unit. Planned Outages are scheduled approximately a year in advance and the  
18 dates of the Planned Outages are approved by PJM.
- 19 • In a Reserve Shutdown Outage the unit is available for generation, but it is placed  
20 in stand-by status by PJM because the generation is not needed on the grid at that  
21 time.
- 22 • Maintenance Outages are shorter in duration (four to ten days) than Planned  
23 Outages and involve emerging issues that typically must be addressed before the  
24 next Planned Outage.
- 25 • A Forced Outage is an unplanned outage needed to address an immediate  
26 operational or safety concern at the generation facility. Forced Outages typically  
27 last from a few hours to several days depending on the situation.

1       Planned Outages and Maintenance Outages are required to maintain the generating units  
2       to ensure the units operate safely, efficiently and prevent issues from causing forced  
3       outages or de-rates during times when the units are economic.

4   **Q.   PLEASE LIST THE PLANNED OR MAINTENANCE OUTAGES THAT WERE**  
5       **EXTENDED BEYOND THE ORIGINAL ESTIMATED END DATE DURING THE**  
6       **REVIEW PERIOD.**

7   A.   Big Sandy Plant did not have any Planned Outages or Maintenance Outages that were  
8       extended beyond the original estimated end date during the Review Period.

**V.   CONCLUSION**

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

10  A.   Yes, it does.

**VERIFICATION**

The undersigned, David L. Mell, being duly sworn, deposes and says he is the Big Sandy 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.



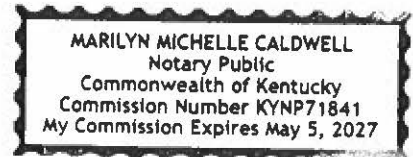
\_\_\_\_\_  
David L. Mell

Commonwealth of Kentucky )  
  )  
County of Boyd )

Case No. 2025-00338

Subscribed and sworn to before me, a Notary Public in and before said County  
and State, by David L. Mell, on January 19, 2026.

  
Notary Public



My Commission Expires May 5, 2027

Notary ID Number KYNP71841