Kentucky Power Company
KPSC Case No. 2025-00346
Commission Staff's First Set of Data Requests
Dated January 14, 2026

DATA REQUEST

KPSC 1_1 Explain how Kentucky Power prioritizes the order in which to complete projects approved through the PJM Regional Transmission Expansion Plan (RTEP) process.

RESPONSE

PJM-approved projects are baseline projects, and they are considered mandatory per the FERC 715 process. Project management, Engineering, and other stakeholders work together to determine the anticipated duration of the project and associated risks, and then develop a schedule from that feedback.

Witness: Jasmine L. Moore

DATA REQUEST

KPSC 1_2 Refer to the Direct Testimony of Jasmine L. Moore (Moore Direct Testimony), page 4, lines 11–12. Case No. 2025-00346

a. Provide a list of projects concerning Kentucky Power included in the PJM 2026 winter case and an anticipated completion date. If possible, separate the projects by N-1 and N-1-1 contingency.

b. Explain whether there are other additional Kentucky Power related PJM projects not included in the PJM 2026 winter case. If so, provide a list of these projects, and if possible, separate them out by N-1 and N-1-1 contingency and the anticipated completion dates.

c. For projects that are listed in the PJM 2026 winter case or any other PJM seasonal case, explain whether PJM requires that they be completed by a date certain. Include in the response whether there is a difference between Baseline and Supplemental projects.

d. Explain whether PJM initially designated the project as supplemental instead of the current baseline designation.

RESPONSE

a. There were three baseline projects identified as part of the 2026 RTEP cycle. All three violations were attributed to N-1-1 contingencies.

- B3349 – Bellefonte Station – Immediate Need and Summer Case Violations – ISD 12/2/2026
- B3352 – 47th Street Station – Summer Case Violations – ISD 4/15/2025
- B3353 – Allen Station – Winter Case Violations – ISD 12/31/2027

b. Please see KPCO_R_KPSC_1_2_Attachment1 for a full list of PJM projects and targeted in-service dates.

c. For baseline projects, the requested in-service date is based on the future RTEP case in which the violation first appears.

This Project is a baseline project that has the benefit of also addressing identified supplemental needs. The criteria for designation as a supplemental or baseline project are not mutually exclusive, and a single project sometimes can be justified under either.

Kentucky Power, through AEP Transmission, participates in the PJM planning process, which is guided by PJM, NERC, RFC, and AEP planning criteria. The process generally results in two categories of projects: baseline and supplemental. Using the aforementioned criteria, PJM and Kentucky Power, in conjunction with AEP, develop baseline projects to address criteria violations. Baseline projects include transmission expansions or enhancements that are required to achieve compliance with respect to PJM's system reliability, operational performance, or market efficiency criteria as determined by PJM's Office of the Interconnection, as well as projects that are needed to meet Transmission Owners' local transmission planning criteria.

Supplemental projects include all projects that are not addressing minimum, bright-line transmission planning criteria. These projects are needed to maintain the existing grid as designed, connect new customers to the grid, satisfy contractual and regulatory requirements, and to meet RTO and industry standards, as set forth in the PJM Operating Agreement. Examples of supplemental upgrades include interconnection of new retail demand, modification to existing delivery points, replacing failed equipment, proactive replacement of deteriorating assets in poor condition prior to failure, modernization and hardening of the grid, improved operational efficiency and performance, and installation and expansion of supervisory control and data acquisition. Supplemental projects do not have PJM mandated in-service dates, however, an expected in-service date is provided by the Company to PJM.

d. This Project was originally presented to PJM as a supplemental project, and later became a baseline project.

Witness: Jasmine L. Moore

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DATA REQUEST

KPSC 1_3 Refer to the Application, page 6, and the Moore Direct Testimony, page 5, lines 5–11. It appears that this project was reviewed with PJM stakeholders in November 2018 and then in two subsequent Sub-Regional Regional RTEP – Western meetings in April 2020 and October 2021.

a. Explain whether the result of the October 2021 RTEP meeting included an approved PJM solution to the transmission contingency violations.

b. In submitting a proposed route to the PJM RTEP process, explain the extent to which Kentucky Power has evaluated different route segments for encroachments, any environmental areas, roads, landslide prone areas, right-of-way (ROW) outage risk or any other constraints.

RESPONSE

a. Yes, in the October 2021 SRRTEP meeting, PJM presented its recommended solution, which was then approved by the PJM board on February 16, 2022.

b. PJM does not require route selection to be submitted with proposals. The graphic presented at the PJM meeting and included in the PJM slides was not a route map, and instead was intended to show project scope detail at a conceptual level.

Witness: Jasmine L. Moore

Kentucky Power Company
KPSC Case No. 2025-00346
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Dated January 14, 2026

DATA REQUEST

KPSC 1_4 Refer to the Moore Direct Testimony, page 6, lines 14–20. Explain whether the project elements associated with a transmission project, but not included in the PJM project submission, can affect the total price of the various PJM solution alternatives such that an alternative not selected by PJM as least cost, could have a lower cost to ratepayers overall once these other project elements are included.

RESPONSE

PJM evaluates transmission options holistically, not only based on the cost of service, but also on the impact of the transmission grid and customers served. Distribution costs are not typically evaluated by PJM. However, the AEP Transmission and Distribution groups work closely together to evaluate all reasonable alternatives, inclusive of all known and estimable costs at the time, and to develop the best solution addressing reliability needs with the least cost impact to stakeholders and customers. After that analysis is completed, the Company then submits the least cost, reasonable solution to this Commission for approval of a CPCN.

Witness: Jasmine L. Moore

Kentucky Power Company
KPSC Case No. 2025-00346
Commission Staff's First Set of Data Requests
Dated January 14, 2026

DATA REQUEST

KPSC 1_5 Refer to the Direct Testimony of Anastacia Santos (Santos Direct Testimony), page 16, lines 3-14. Explain what new cultural resources were discovered in the April 2025 environmental survey that had been missed during initial route selection process.

RESPONSE

Environmental surveys, including cultural resource surveys, are conducted after the route selection process is complete. During the April 2025 environmental surveys for the proposed ROW, numerous unmarked gravestones were discovered. These were only discovered once Kentucky Power was granted permission from landowners to survey properties crossed by the Project and the proposed ROW. Based on these findings, the Project team conducted additional siting activities to avoid the newly identified gravestones.

Witness: Anastacia Santos

Kentucky Power Company
KPSC Case No. 2025-00346
Commission Staff's First Set of Data Requests
Dated January 14, 2026

DATA REQUEST

KPSC 1_6 Refer to the Santos Direct Testimony, page 7, lines 3-9. Explain in further detail how the "uniformity of terrain type" renders the EPRI methodology infeasible and not probative for an accurate assessment of route selection options.

RESPONSE

The terrain within the study area is predominantly undeveloped and mountainous, which would not yield sufficient differentiation among land uses or the resulting transmission corridors under the Kentucky EPRI methodology to make its use probative. The uniformity of terrain type is further constrained by residential development concentrated along linear valley bottoms, which limits where a transmission line can reasonably be sited while adhering to favorable terrain that does not present constructability and maintenance risks related to potential landslides, unstable geology, and poor accessibility. Kentucky Power would be pleased to conduct a field review with Commission Staff to review the Project area and demonstrate how the uniqueness of the area renders the EPRI model infeasible and not probative for an accurate assessment of route selection options.

Witness: Anastacia Santos

Kentucky Power Company
KPSC Case No. 2025-00346
Commission Staff's First Set of Data Requests
Dated January 14, 2026

DATA REQUEST

KPSC 1_7 Refer to the Santos Direct Testimony, page 7, lines 19–23 and page 8, lines 1–13. Compare the various evaluation steps in the EPRI methodology to the "traditional and accepted multi-step methodology" employed by Kentucky Power.

RESPONSE

Both the EPRI and Kentucky Power methodologies consider the same categories including the built environment, natural environment, and engineering considerations when siting a transmission line. The key difference between the two models is that Kentucky Power does not employ weighted values to each category or criteria being considered. Instead, the Project team approaches the siting process through a methodology that considers both quantitative data from the categories listed previously and qualitative input from the public and the Project team with expertise in areas such as engineering, geohazard suitability, and the environment. This combined approach allows the Project team to consider additional parameters that may not otherwise be captured within a weighted criteria model like the EPRI methodology.

Witness: Anastacia Santos

DATA REQUEST

KPSC 1_8 Refer to the Santos Direct Testimony, page 7.

a. Explain whether Kentucky Power has ever employed the siting methodology used in this application in any other previous applications before the Commission.

b. If known, provide a list of any other utilities in Kentucky utilizing this siting methodology.

RESPONSE

a. Kentucky Power has employed the siting methodology used in this application in several other previous applications before the Commission, including those listed in the table below.

Project Name	Case No.
Belfry Area Transmission Line Project	2023-00040
Garrett Area Improvements 138kV Transmission Line Project	2021-00346
Kewanee-Enterprise Park 138kV Transmission Line Project	2020-00062
East Park 138kV Transmission Line Project	2018-00072
Enterprise Park Economic and Area Improvements Project	2018-00209
Bonnyman-Soft Shell 138kV Transmission Line Project	2011-00295
Beaver Creek-Hazard 138kV Line Relocation Project	2009-00235
Hays Branch-Morgan Fork	2007-00155

b. Kentucky Power is unaware as to whether any other utilities in Kentucky use the same siting methodology as Kentucky Power. AEP utilizes this methodology in all the regions it operates within and it has been a widely accepted methodology.

Please also see the Company's responses to KPSC 1-6 and KPSC 1-7 for additional support as to why the method employed by Kentucky Power here is reasonable.

Witness: Anastacia Santos

Kentucky Power Company
KPSC Case No. 2025-00346
Commission Staff's First Set of Data Requests
Dated January 14, 2026

DATA REQUEST

KPSC 1_9 Refer to the Santos Direct Testimony, page 12, lines 17–18 and page 14, lines 4–5. Explain how Kentucky Power plans and addresses with encroachments on its transmission lines.

RESPONSE

For new lines, encroachments are avoided during the siting phase. Easement language is included to prohibit encroachments within the easement area. If an encroachment cannot be avoided, the ROW department will work with the landowner to relocate the said encroachment and pay for any expenses incurred by the landowner. In certain instances, if engineering determines that there are no clearance violations between the conductor and encroachment, an encroachment agreement may be used to allow the encroachment to remain in the easement area, pending review and approval by the legal department.

For existing lines, any encroachment within the easement is evaluated against the easement terms. If the encroachment is not permitted and does not have electrical service, the landowner is responsible for relocation at their expense. If the encroachment is not permitted and does have electrical service, Kentucky Power works with the landowner to remove the encroachment and covers necessary removal-related costs.

Witness: Anastacia Santos

Kentucky Power Company
KPSC Case No. 2025-00346
Commission Staff's First Set of Data Requests
Dated January 14, 2026

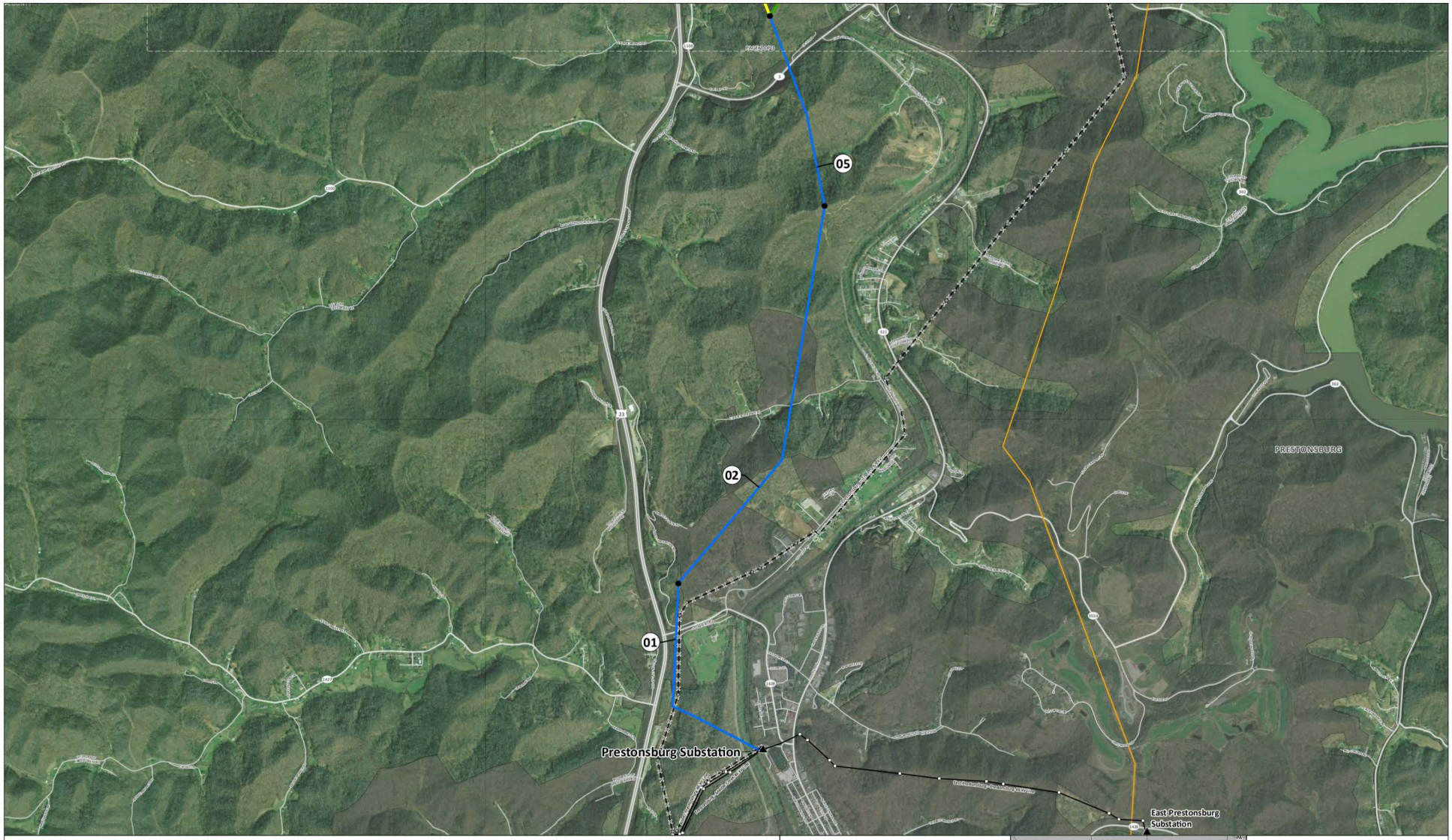
DATA REQUEST

KPSC 1_10 Refer to the Santos Direct Testimony, page 14, lines 11–19. Provide an updated Exhibit 15 with the various study segments labeled.

RESPONSE

Please see KPCO_R_KPSC_1_10_Attachment1, which includes the requested updated Exhibit 15 with the various study segments labeled.

Witness: Anastacia Santos



- Existing AEP Structure
- Existing AEP Structure to be Removed
- Existing AEP Substation
- Study Segment Node
- Focus Area 1 - Comparison A
- Focus Area 1 - Comparison B
- Initial Route
- Existing AEP Transmission Line
- Existing Transmission Line to be Removed
- Non-AEP Transmission Line
- Highway
- Local Road
- Map Tile
- City/Municipal Limit

KENTUCKY POWER
An AEP Company

PAGE 1 OF 3

Johnson and Floyd Counties, Kentucky

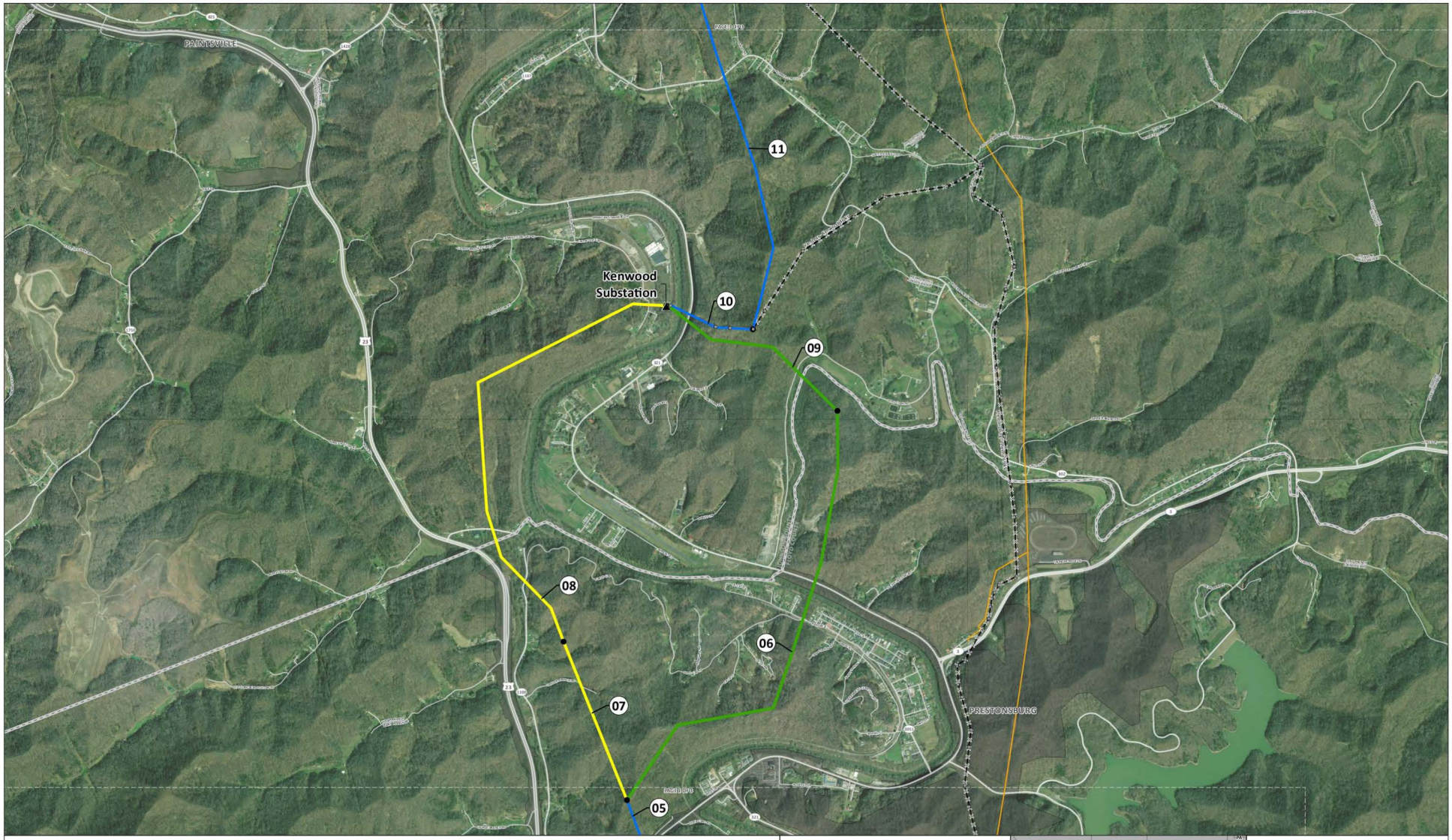
1 inch = 1000 feet
when printed at 24x36

0 1,000 2,000 3,000
Feet

January 26, 2026

Exhibit 15: Alternative Routes

Prestonsburg - Thelma Transmission Line Rebuild Project



- Existing AEP Structure to be Removed
- Existing AEP Substation
- Study Segment Node
- Focus Area 1 - Comparison A
- Focus Area 1 - Comparison B
- Initial Route
- Existing Transmission Line to be Rebuilt
- Existing Transmission Line to be Removed
- Non-AEP Transmission Line
- Highway
- Local Road
- Map Tile
- City/Municipal Limit

KENTUCKY POWER
An AEP Company

PAGE 2 OF 3

Johnson and Floyd Counties, Kentucky

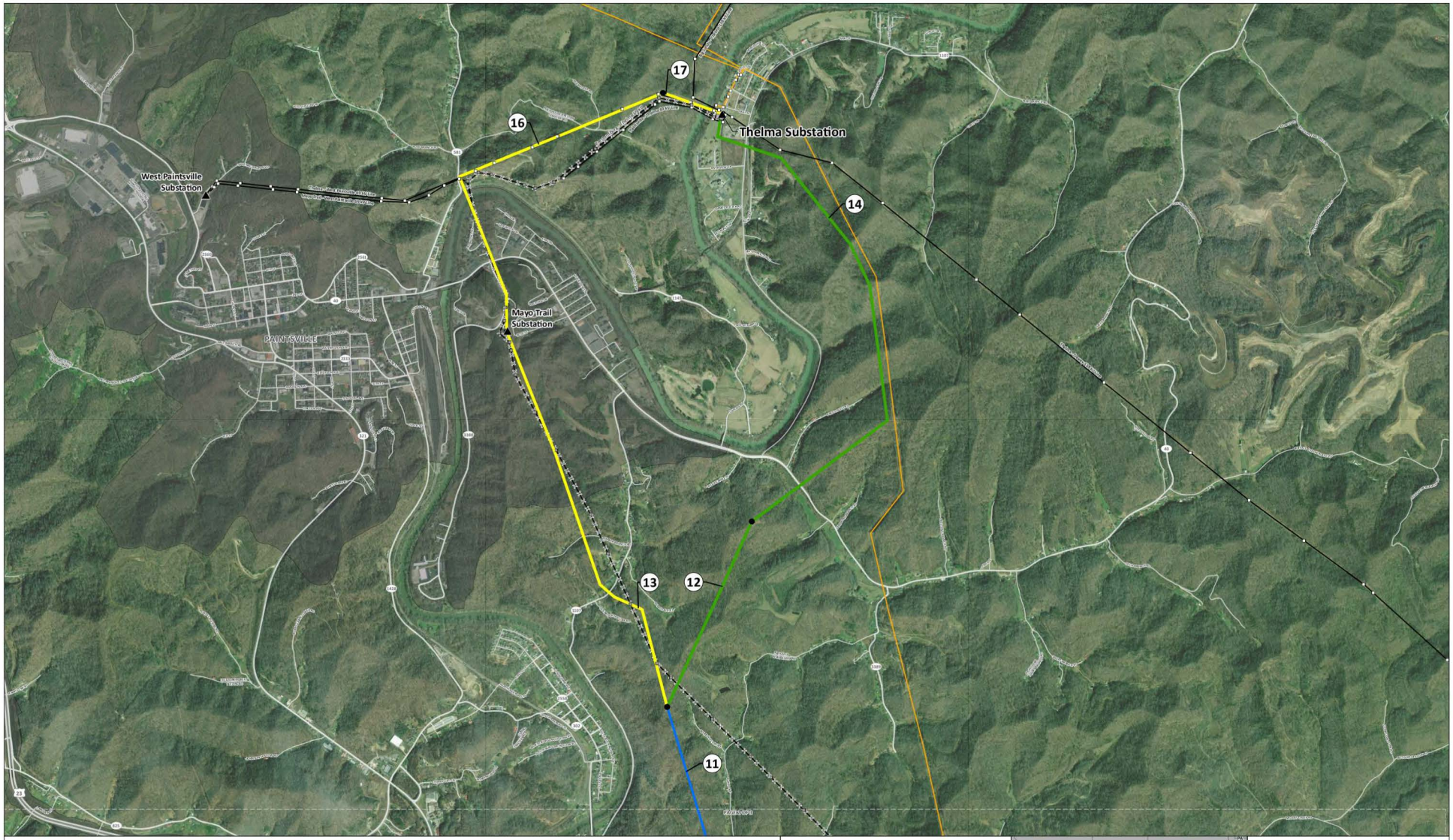
1 inch = 1000 feet
when printed at 24x36

0 1,000 2,000 3,000
Feet

January 26, 2026

Exhibit 15: Alternative Routes

Prestonsburg - Thelma Transmission Line Rebuild Project



Existing AEP Structure
Existing AEP Structure to be Removed
Existing AEP Substation
Study Segment Node
Focus Area 2 - Comparison A
Focus Area 2 - Comparison B
Initial Route
Existing AEP Transmission Line
Existing Transmission Line to be Removed
Non-AEP Transmission Line
Highway
Local Road
Map Tile
City/Municipal Limit

KENTUCKY POWER
An AEP Company

PAGE 3 OF 3

Johnson and Floyd Counties, Kentucky

1 inch = 1000 feet
when printed at 24x36
0 1,000 2,000 3,000
Feet

January 26, 2026

Exhibit 15: Alternative Routes

Prestonsburg - Thelma Transmission Line Rebuild Project

Kentucky Power Company
KPSC Case No. 2025-00346
Commission Staff's First Set of Data Requests
Dated January 14, 2026

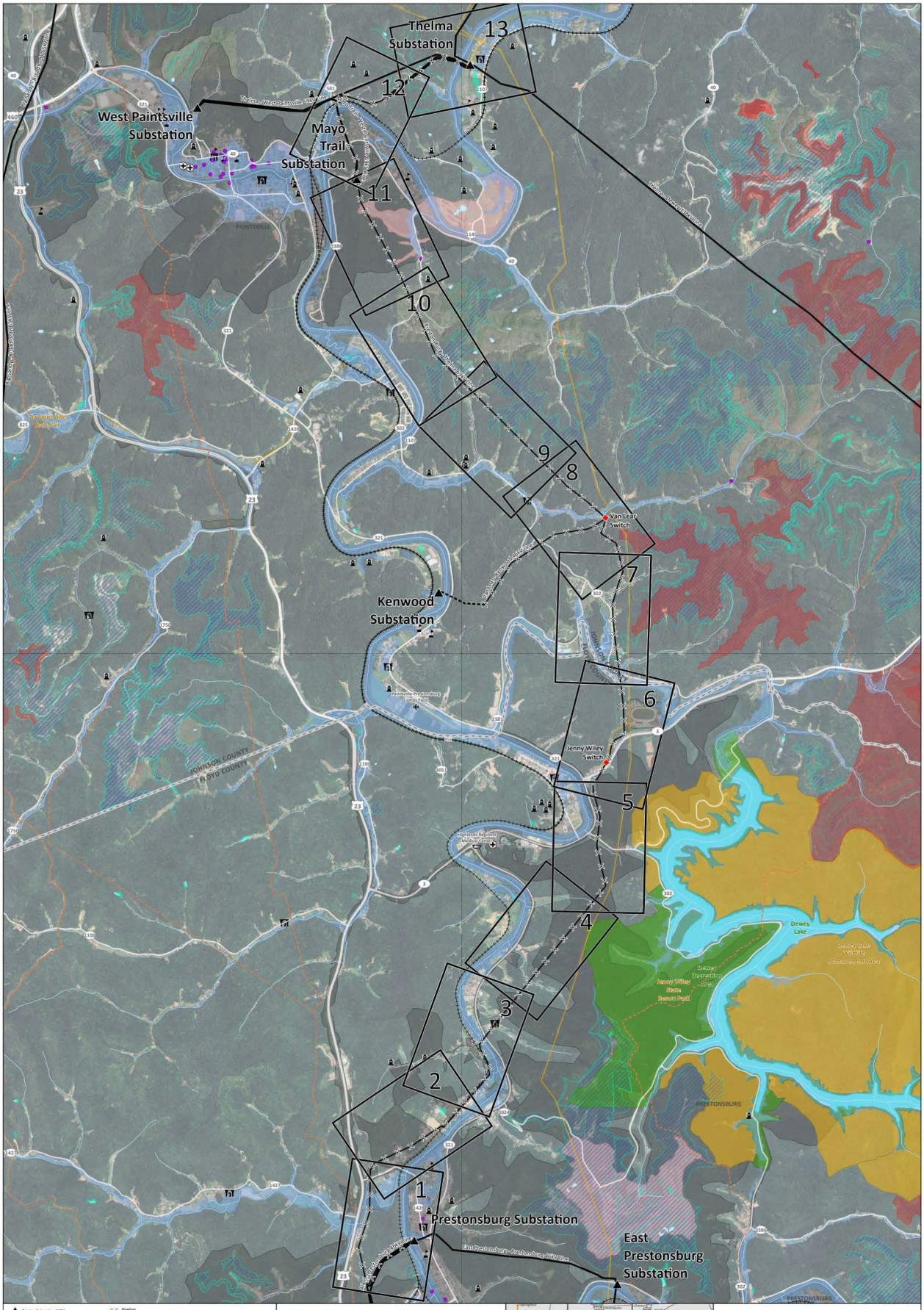
DATA REQUEST

KPSC 1_11 Refer to the Santos Direct Testimony, page 5, lines 22 and 23. Provide a map of the habitable structures in the current ROW. Identify the current transmission line route, the current ROW, and the structures.

RESPONSE

Please see KPCO_R_KPSC_1_11_Attachment1, which includes a map depicting what Kentucky Power believes to be the habitable structures within the existing ROW.

Witness: Anastacia Santos



Existing Substation (AEP)
Existing Switch Station To Be Removed (AEP)
Airport
Heliport
Cemetery/Burial Ground
Historic Site (NRHP)
Hospital
Place of Worship
School
Existing Transmission Line (AEP)
Existing Transmission Line To Be Rebuilt (AEP)
Existing Transmission Line To Be Removed (AEP)
Non-AEP Transmission Line
Pipeline
Railroad
Highway
Stream (NHD)
City/Municipal Limit
County Boundary
100-year Floodplain (FEMA)
Federal Conservation Land (PAD-US)
Local Conservation Land (PAD-US)
State Conservation Land (PAD-US)
Permitted Surface Mine Boundary
Permitted Underground Mine Boundary
Waterbody (NHD)
Wetland (NWI)
Figure Key

AMERICAN ELECTRIC POWER

Only one route will be chosen and built. Shown segments/routes could change based on landowner input, engineering, ground surveys and studies.

1 inch = 2,000 feet
when printed at 22x34

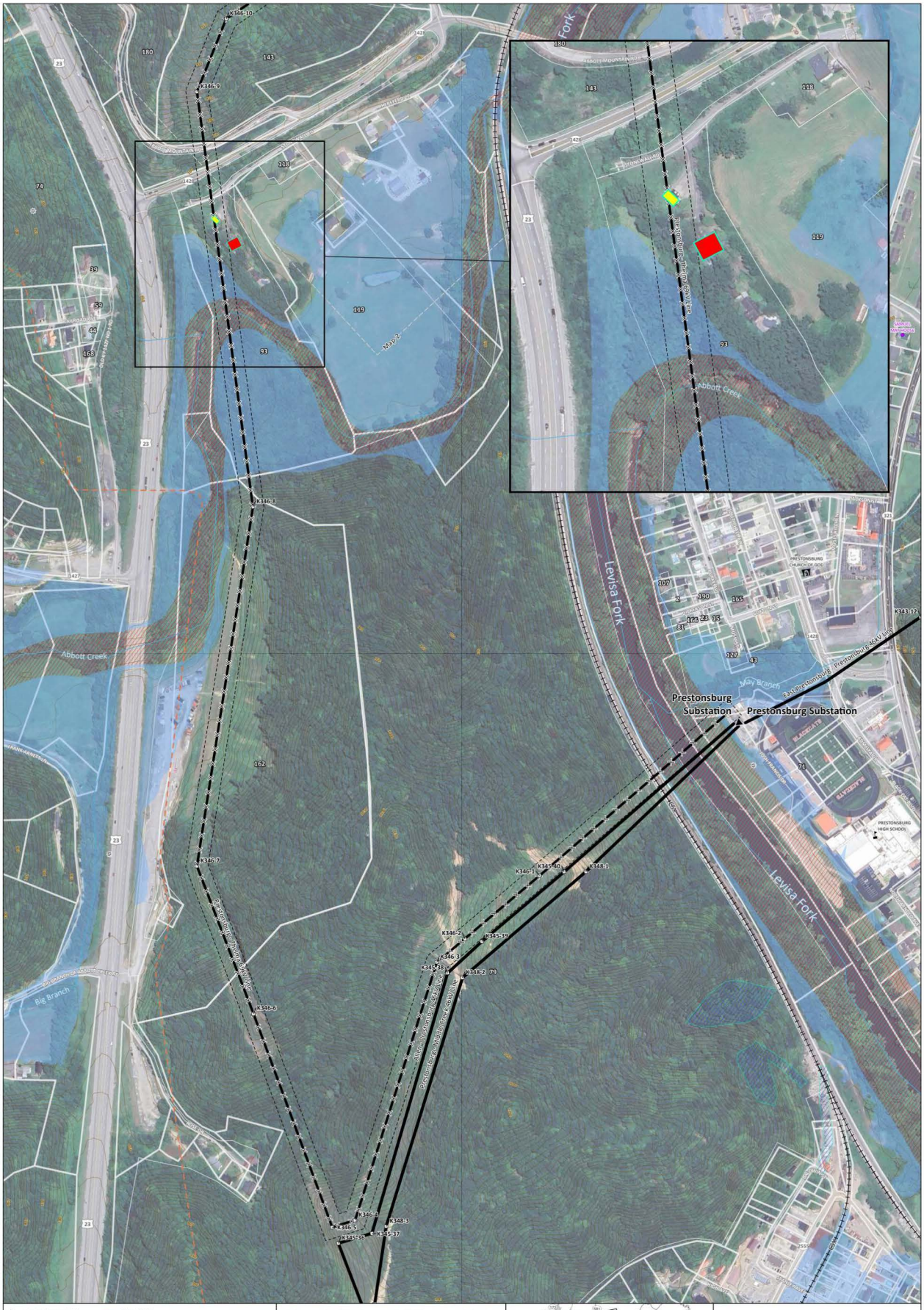
0 2,000 4,000
US Feet

0 0.5 1
Miles

January 23, 2026

Aerial Habitable and Non-habitable Structures Index Map

Prestonsburg to Thelma Transmission Line Rebuild Project



Existing Substation (AEP)
Existing Structure (AEP)
School
Place of Worship
Cemetery/Burial Ground
Oil/Gas Well
Historic Site (NRHP)
Existing Transmission Line (AEP)
Existing Transmission Line To Be Removed (AEP)
Pipeline
Railroad
Stream (NHD)
Non-Habitable Structure (Within Existing 100' ROW)
Habitable Structure (Within Existing 100' ROW)
Existing Right-of-Way (100')
Permitted Mine Boundary-Surface
100-year Floodplain (FEMA)
Floodway (FEMA)
Waterbody (NHD)
Parcel Boundary
Map Tile

AMERICAN ELECTRIC POWER

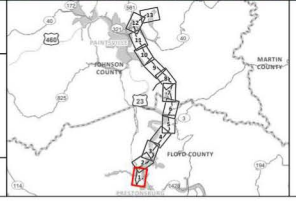
Only one route will be chosen and built. Shown segments/routes could change based on landowner input, engineering, ground surveys and studies.

1 inch = 200 feet
when printed at 22x34

0 200 400 600
Feet

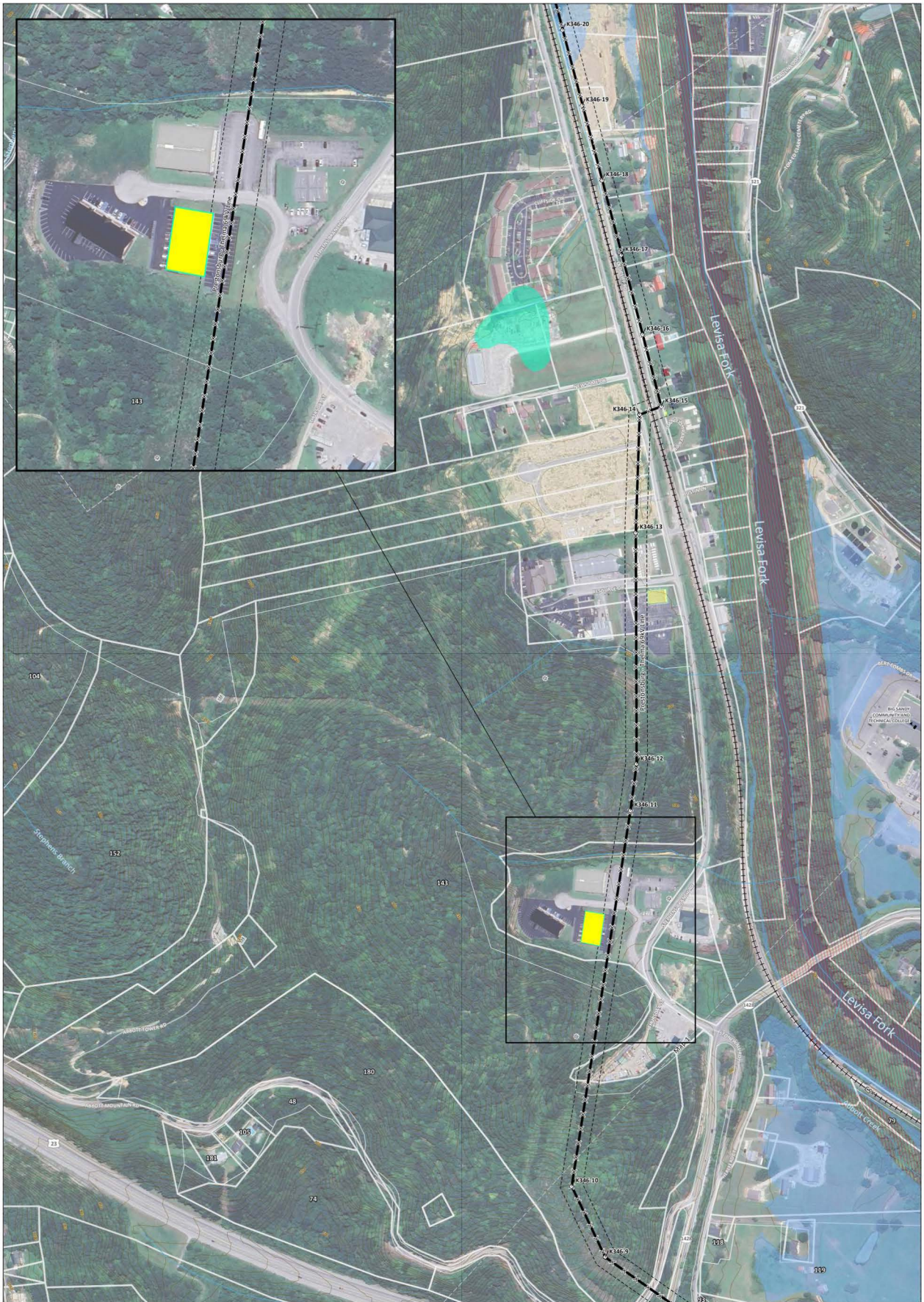
Imagery Source: Google Satellite

January 23, 2026



Aerial Map 1 of 13

Prestonsburg to Thelma Transmission Line Rebuild Project



Existing Structure (AEP)
School
Oil/Gas Well
Communication Tower (FCC)
Existing Transmission Line To Be Removed (AEP)
Railroad
Stream (NHD)
Non-Habitable Structure (Within Existing 100' ROW)
Existing Right-of-Way (100')
Wetland (NWI)
100-year Floodplain (FEMA)
Floodway (FEMA)
Waterbody (NHD)
Parcel Boundary
Map Tile

AMERICAN ELECTRIC POWER

Only one route will be chosen and built. Shown segments/routes could change based on landowner input, engineering, ground surveys and studies.

1 inch = 200 feet
when printed at 22x34

0 200 400 600
Feet

Imagery Source: Google Satellite

January 23, 2026

Aerial Map 2A of 13

Prestonsburg to Thelma Transmission Line Rebuild Project

Existing Structure (AEP)
School
Oil/Gas Well
Communication Tower (FCC)
Existing Transmission Line To Be Removed (AEP)
Railroad
Stream (NHD)
Non-Habitable Structure (Within Existing 100' ROW)
Existing Right-of-Way (100')
Wetland (NWI)
100-year Floodplain (FEMA)
Floodway (FEMA)
Waterbody (NHD)
Parcel Boundary
Map Tile

AMERICAN ELECTRIC POWER

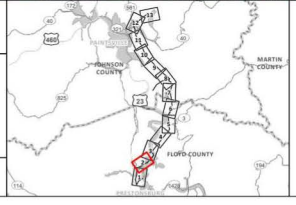
Only one route will be chosen and built. Shown segments/routes could change based on landowner input, engineering, ground surveys and studies.

1 inch = 200 feet
when printed at 22x34

0 200 400 600
Feet

Imagery Source: Google Satellite

January 23, 2026



Aerial Map 2B of 13

Prestonsburg to Thelma Transmission Line Rebuild Project

Existing Structure (AEP)
School
Oil/Gas Well
Communication Tower (FCC)
Existing Transmission Line To Be Removed (AEP)
Railroad
Stream (NHD)
Non-Habitable Structure (Within Existing 100' ROW)
Habitable Structure (Within Existing 100' ROW)
Existing Right-of-Way (100')
Wetland (NWI)
100-year Floodplain (FEMA)
Floodway (FEMA)
Waterbody (NHD)
Parcel Boundary
Map Tile

AMERICAN ELECTRIC POWER

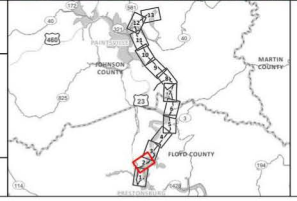
Only one route will be chosen and built. Shown segments/routes could change based on landowner input, engineering, ground surveys and studies.

1 inch = 200 feet
when printed at 22x34

0 200 400 600
Feet

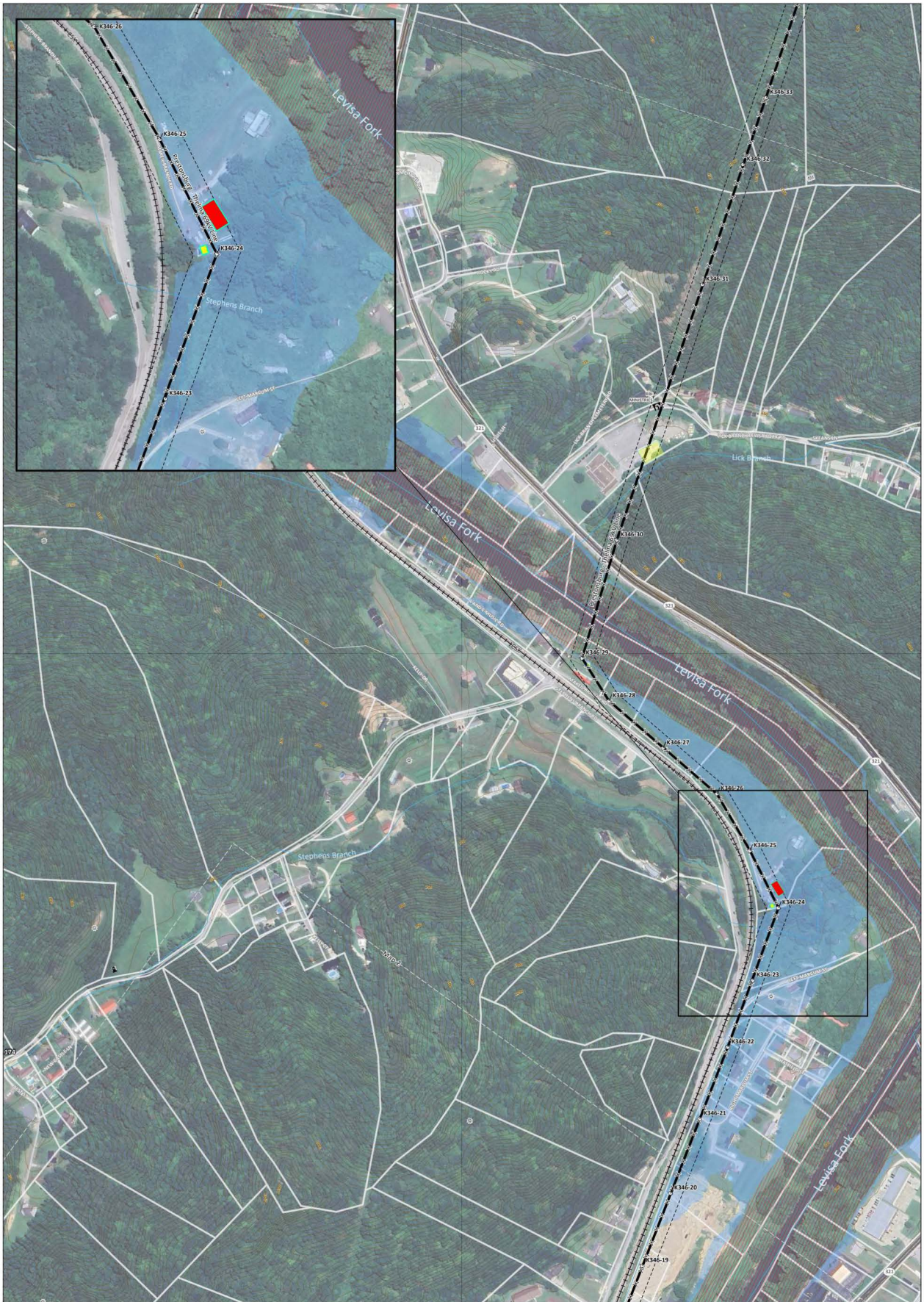
Imagery Source: Google Satellite

January 23, 2026



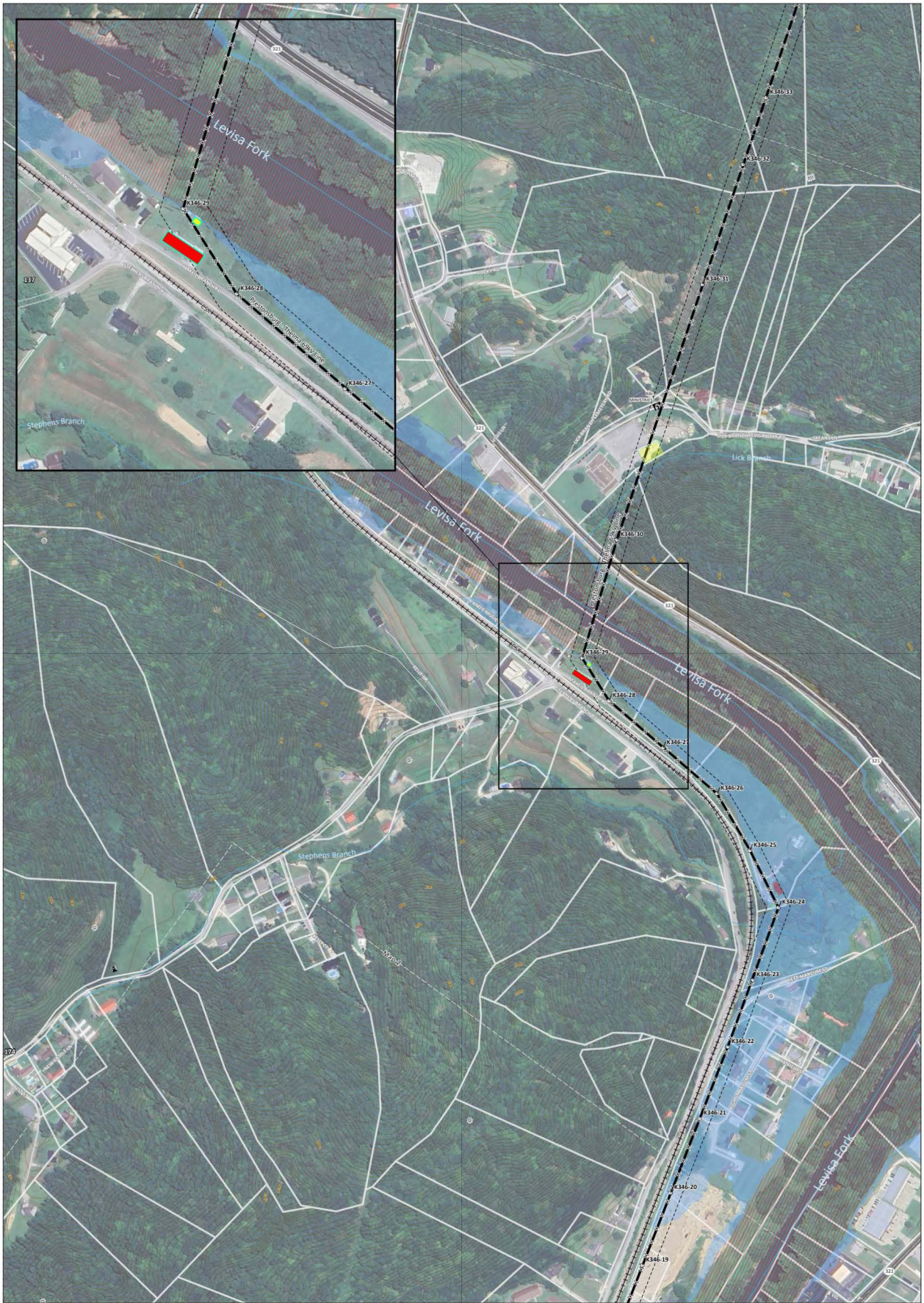
Aerial Map 2C of 13

Prestonsburg to Thelma Transmission Line Rebuild Project



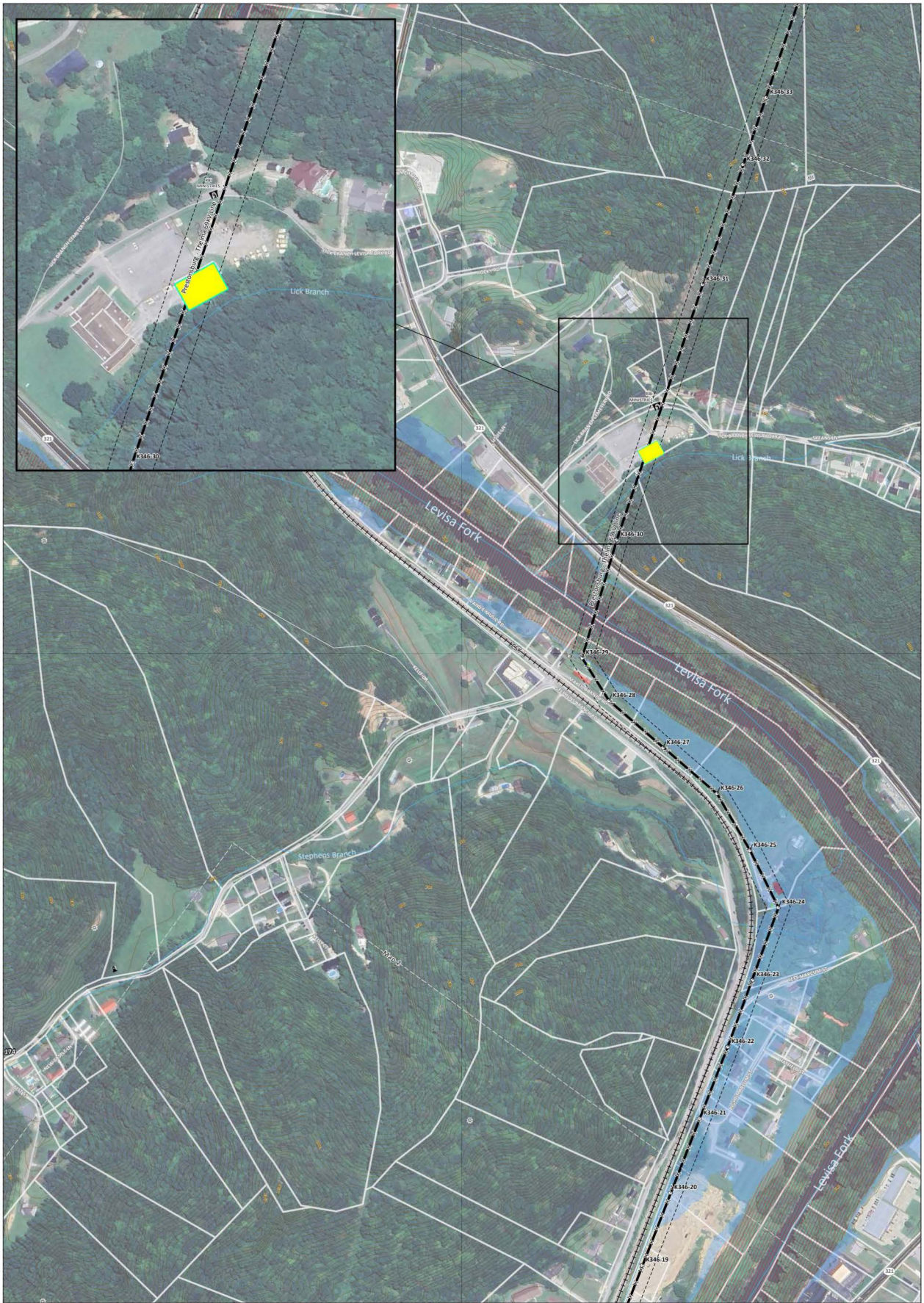
Aerial Map 3A of 13

Prestonsburg to Thelma Transmission Line Rebuild Project



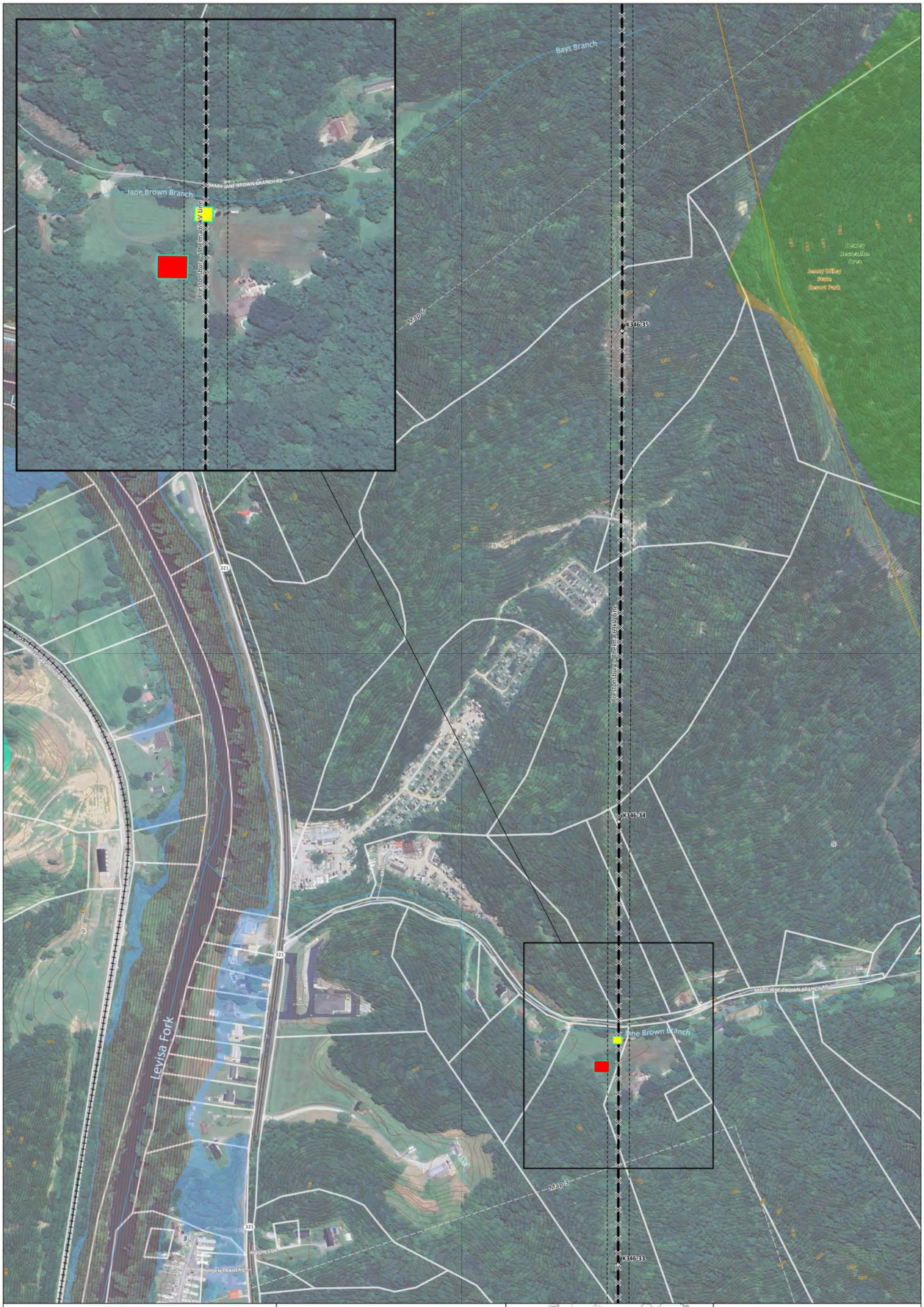
Aerial Map 3B of 13

Prestonsburg to Thelma Transmission Line Rebuild Project



Aerial Map 3C of 13

Prestonsburg to Thelma Transmission Line Rebuild Project



Aerial Map 4 of 13

Prestonsburg to Thelma Transmission Line Rebuild Project