

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

DATA REQUEST

KPSC 1_12 Refer to the Santos Direct Testimony, page 5, lines 22 and 23. Provide a map of the non-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 non-habitable structures within the existing ROW.

Witness: Anastacia Santos

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KPSC 1_13 Refer to the Santos Direct Testimony, page 5, lines 22 and 23. Confirm this statement to be true as of December 2025 and not an earlier date. If not confirmed, explain the response.

RESPONSE

Not confirmed. The siting team uses aerial imagery to identify structures within the project area. The existing ROW contains 27 habitable structures and 25 non-habitable structures. This current structure count differs from the count in Santos Direct Testimony because the aerial imagery was updated between when the application was submitted and today. The updated aerial imagery indicates two new non-habitable structures and two more non-habitable structures which were previously thought to be habitable, which accounts for the decrease in number of habitable structures and increase in non-habitable structures.

Witness: Anasatcia Santos

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DATA REQUEST

KPSC 1_14 Refer to the Santos Direct Testimony, pages 5–6. Explain whether any of the structures identified in the testimony will be included in the requested ROW for this proposed project.

RESPONSE

This Project will be constructed in new ROW. For this reason, none of the structures identified in the existing ROW and discussed in the referenced Santos Testimony will be located in the new ROW.

Witness: Anastacia Santos

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DATA REQUEST

KPSC 1_15 Refer to the Santos Direct Testimony, page 5. Explain what “AEP clearance requirements” is and how they were applied in this application.

RESPONSE

The National Electric Safety Code (“NESC”) is a minimum safety code and not a design standard or specification. Generally, AEP clearance requirements meet the current National Electric Safety Code (“NESC”) with an additional buffer intended to provide ensured compliance, reliability, and resiliency. AEP standards are intended to establish a uniform set of design criteria for strength, clearances, and component application for all new AEP overhead transmission line facilities. Stipulating these criteria provides consistency and standardization across the AEP system. When AEP applies these criteria, new facilities will meet or exceed the requirements of the National Electrical Safety Code (NESC). Transmission line structure spotting and associated structure heights are selected to meet or exceed the NESC code and AEP clearance requirements.

Witness: Tanner S. Wolffram

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KPSC 1_16 Refer to the Santos Direct Testimony, page 11. Provide an updated Light Detection and Ranging Survey.

RESPONSE

Light Detection and Ranging (LiDAR) surveys for lines of this length are performed using fixed wing airplanes and can cost approximately \$8,000 per mile. They also take months to provide usable survey data. The output files include tiled imagery and a point cloud of coded survey points, which are brought into engineering software (PLS-CADD) and used for transmission line design. These deliverables are very large files, typically multiple gigabytes in size. LiDAR was flown on the line in 2023, and in October 2025, an additional section of LiDAR was flown to encompass a segment of the line that was rerouted after the 2023 flight. In addition to LiDAR flights, field work has been performed to confirm and verify structure locations, identify environmental and cultural features, perform geotechnical investigations, and scout access roads. With this supplemental field information, 2023 LiDAR survey and additional 2025 reroute LiDAR survey, the Company believes that the information acquired for this project is sufficient to design the transmission line without acquiring an updated LiDAR survey. After construction, an additional LiDAR flight will also be performed to capture as-built conditions.

Witness: J Scott Woody

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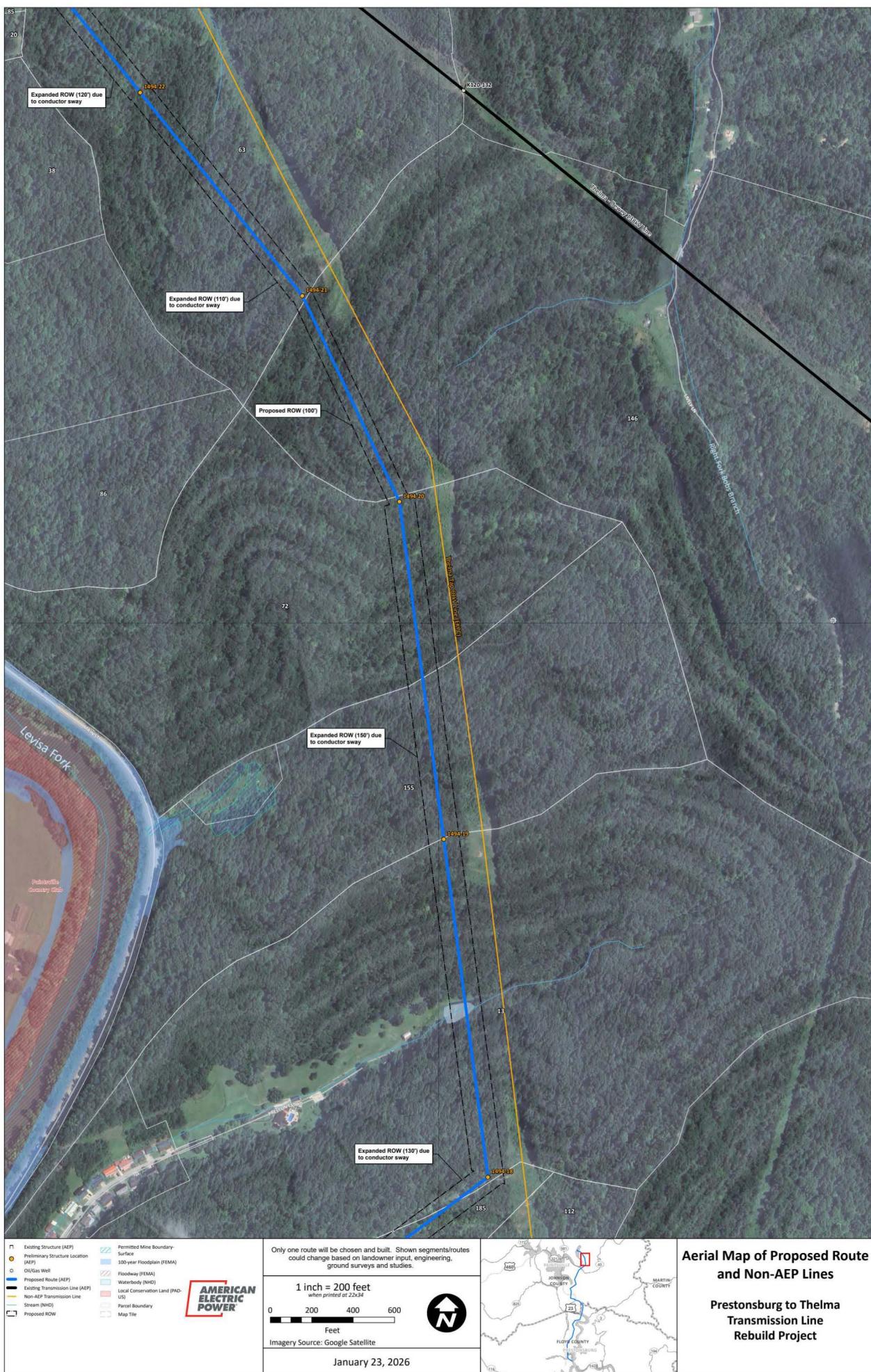
DATA REQUEST

KPSC 1_17 Refer to Santos Direct Testimony, page 12, lines 6–12. Provide a map with the proposed transmission line route and the parallel non-AEP transmission lines.

RESPONSE

Please see KPCO_R_KPSC_1_17_Attachment1, which includes a map depicting the proposed transmission line route and the parallel non-AEP transmission lines.

Witness: Anastacia Santos



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DATA REQUEST

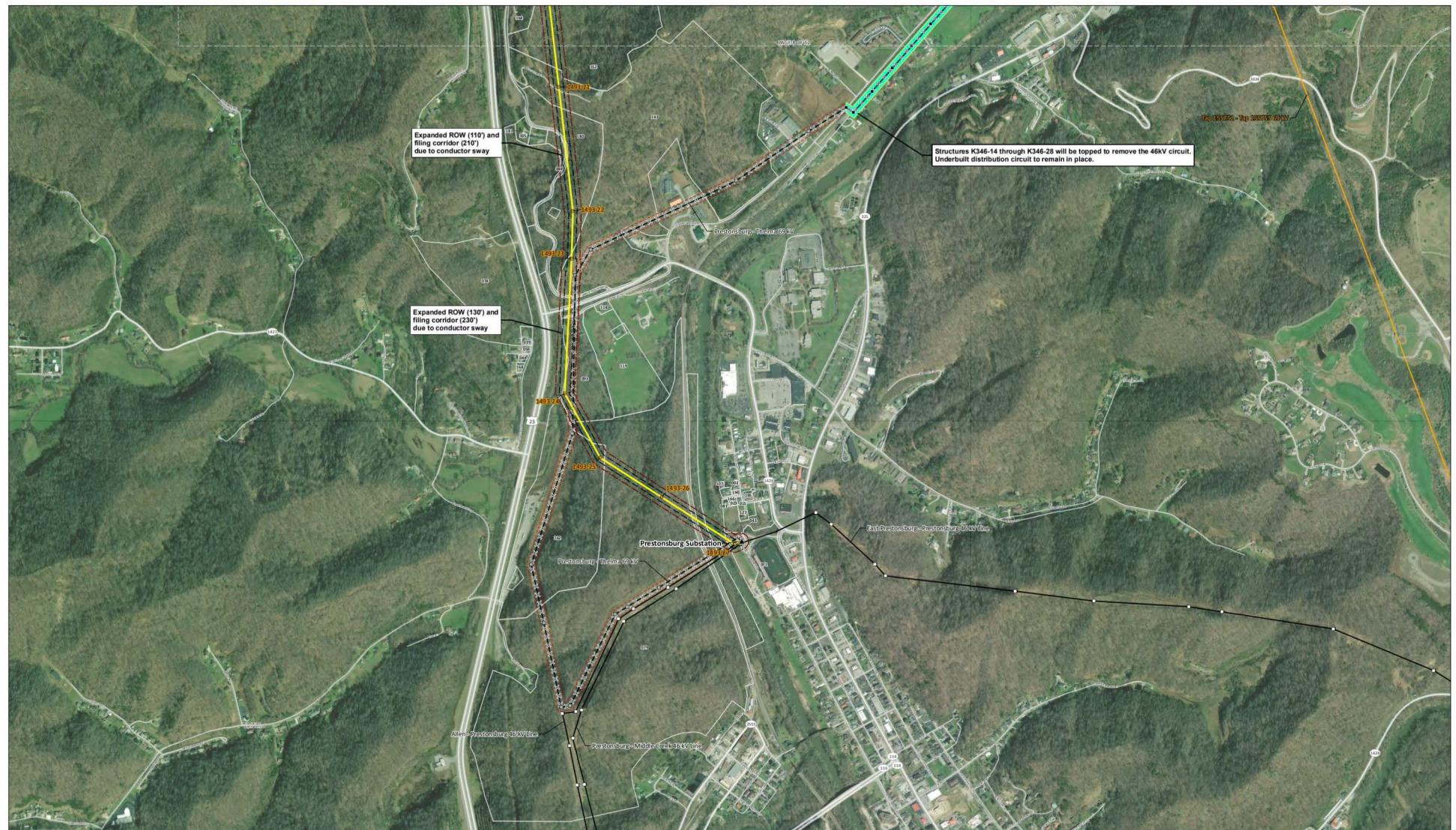
KPSC 1_18 Refer to the Application, Exhibit 8, page 2, and Exhibit 4. Provide updated maps showing the other transmission lines and the respective line voltages interconnecting with the Prestonsburg, Kenwood, and Thelma substations.

RESPONSE

Please see KPCO_R_KPSC_1_18_Attachment1, which includes a map depicting the other transmission lines and the respective line voltages interconnecting with the Prestonsburg, Kenwood, and Thelma substations.

Witness: Anastacia Santos

Witness: J. Scott Woody



- Proposed Structure
- Existing Structure (AEP)
- Structure to be Removed (AEP)
- Structure to be Retained (AEP)
- ▲ Existing AEP Substation
- Existing AEP Transmission Line
- Existing Transmission Line to be Removed
- Non-AEP Transmission Line
- Highway
- Local Road
- Proposed 100-foot ROW¹
- Proposed 200-foot Filing Corridor²
- Existing ROW (AEP)
- Existing ROW to be Retained (AEP)
- Property Line Boundary with AEP Landowner ID³
- Map Tile

1) Transmission line route is preliminary and subject to change. Final line route and structure locations will be determined during final engineering, which includes ground surveys and geotechnical and environmental studies.

2) A typical 100-foot wide right-of-way will generally be staked within an approximately 200-foot wide corridor. The Company needs the right-of-way to be staked on both sides of the corridor. The staked area is either direction from the centerline as necessary after completion of final engineering, ground surveys, and additional discussions with landowners. In 23 locations, the filing corridor is expanded to no more than 380 feet due to conductor sway.

3) The PVA parcels are not based on an accurate ground survey and should not be construed or used as exact descriptions of legal boundaries.



Sheet 1 of 6

Johnson and Floyd Counties, Kentucky
 1 inch = 500 feet
 when printed at 300 dpi
 0 500 1,000 1,500
 Feet
 January 28, 2026



Exhibit 4: Proposed Route
Prestonsburg - Thelma
Transmission Line
Rebuild Project

