

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF KENTUCKY)	
POWER COMPANY FOR 1) A CERTIFICATE)	
OF PUBLIC CONVENIENCE AND NECESSITY)	Case No. 2026-00001
TO CONSTRUCT A MECHANICAL DRAFT)	
COOLING TOWER AT THE MITCHELL)	
PLANT 2) APPROVAL OF CERTAIN)	
REGULATORY AND ACCOUNTING)	
TREATMENTS, AND 3) ALL OTHER)	
REQUIRED APPROVALS AND RELIEF)	

**SIERRA CLUB’S SECOND PUBLIC REQUESTS FOR INFORMATION TO
KENTUCKY POWER COMPANY**

Sierra Club hereby submits this Second Public Requests for Information to Kentucky Power Company (“the Company”). Please provide responses to these data requests below to the undersigned counsel.

GENERAL INSTRUCTIONS

1) Definitions: For the purposes of these data requests, the following definitions shall apply:

- a) The terms “Kentucky Power Company,” “Kentucky Power,” or “the Company” means and include any and all affiliates and/or subsidiaries, successors, predecessors, agents, consultants, and witnesses in this proceeding, and any and all of their affiliates, subsidiaries, or predecessors.

- b) The term “Company” means Kentucky Power Company and any and all affiliates and/or subsidiaries, successors, predecessors, agents, consultants, and witnesses in this proceeding, and any and all of their affiliates, subsidiaries, or predecessors.

- c) “Document” means all written, recorded or graphic matters, however produced or reproduced, pertaining in any manner to the subject of this proceeding, whether or not now in existence, without limiting the generality of the foregoing, all originals, copies and drafts of all writings, correspondence, telegrams, notes or sound recordings of any type of personal or telephone communication, or of meetings or conferences, minutes of directors or committee meetings, memoranda, inter-office communications, studies, analyses, reports, results of investigations, reviews, contracts, agreements, working papers, statistical records, ledgers, books of account, vouchers, bank checks, x-ray prints, photographs, films, videotapes, invoices, receipts, computer printouts or other products of computers, computer files, stenographer’s notebooks, desk calendars, appointment books, diaries, or other papers or objects similar to any of the foregoing, however denominated. If a document has been prepared in several copies, or additional copies have been made, and the copies are not identical (or which, by reasons of subsequent modification of a copy by the addition of notations, or other modifications, are no longer identical) each non-identical copy is a separate “document.”
- d) “And” or “or” shall be construed conjunctively or disjunctively as necessary to make the requests inclusive rather than exclusive.
- e) The terms “you” and “your” refer to “Kentucky Power Company.”
- f) The term “person” means any natural person, corporation, corporate division, partnership, limited liability company, other unincorporated association, trust, government agency, or entity.
- g) The term “regarding” means consisting of, containing, mentioning, suggesting, reflecting, concerning, regarding, summarizing, analyzing, discussing, involving, dealing with, emanating from, directed at, pertaining to in any way, or in any way logically or factually connected or associated with the matter discussed.
- h) The singular as used herein shall include the plural and the masculine gender shall include the feminine and the neuter.
- i) “Identify” or “identifying” or “identification” when used in reference to a person that is a natural person means to state: the full name of the person and any names under which he conducts business; the current employer of the person, the person’s job title and classification, the present or last known work address of the person; and, the present or last known telephone number of the person.
- j) “Identify” or “identifying” or “identification” when used in reference to a person other than a natural person means to state: the full name of the person and any names under which it conducts business; the present or last known address of the person; and, the present or last known telephone number of the person.
- k) “Identify” or “identifying” or “identification” when used in reference to a document means to provide with respect to each document requested to be

identified by these discovery requests a description of the document that is sufficient for purposes of a request to produce or a subpoena duces tecum, including the following:

- (a) the type of document (e.g., letter, memorandum, etc.);
 - (b) the date of the document;
 - (c) the title or label of the document;
 - (d) the Bates stamp number or other identifier used to number the document for use in litigation;
 - (e) the identity of the originator;
 - (f) the identity of each person to whom it was sent;
 - (g) the identity of each person to whom a copy or copies were sent;
 - (h) a summary of the contents of the document;
 - (i) the name and last known address of each person who presently has possession, custody or control of the document; and,
 - (j) if any such document was, but is no longer, in your possession, custody or control or is no longer in existence, state whether it: (1) is missing or lost; (2) has been destroyed; or (3) has been transferred voluntarily or involuntarily, and if so, state the circumstances surrounding the authorization for each such disposition and the date of such disposition.
- l) “Identify” or “identifying” or “identification” when used in reference to communications means to state the date of the communication, whether the communication was written or oral, the identity of all parties and witnesses to the communication, the substance of what was said and/or transpired and, if written, identify the document(s) containing or referring to the communication.
 - m) “Current” when used in reference to time means in the present time of this data request.
 - n) “Customer” means a person or company (residential, commercial, or industrial) who buys retail electricity on a regular and ongoing basis from Kentucky Power Company.
 - o) “Workpapers” are defined as original, electronic, machine-readable, unlocked, Excel format (where possible) with formulas in-tact.

OTHER INSTRUCTIONS

- a) Responses are to be provided in electronic format (e.g., text documents should be in the original word processor file format or PDF, data files should be in Excel).
- b) If you contend that any response to any data request may be withheld under the attorney-client privilege, the attorney work product doctrine or any other privilege or basis, please state the following with respect to each such response in order to explain the basis for the claim of privilege and to permit adjudication of the propriety of that claim: 1) The privilege asserted and its basis; 2) The nature of

the information withheld; and, 3) The subject matter of the document, except to the extent that you claim it is privileged.

- c) For any document or set of documents Kentucky Power Company objects to providing to Sierra Club on the grounds it is burdensome or voluminous, please identify the specific document (see instruction (k) above).
- d) These data requests are to be answered with reference to all information in your possession, custody or control or reasonably available to you. These data requests are intended to include requests for information, which is physically within your possession, custody or control as well as in the possession, custody or control of your agents, attorneys, or other third parties from which such documents may be obtained.
- e) If any data request cannot be responded to or answered in full, answer to the extent possible and specify the reasons for your inability to answer fully.
- f) These data requests are continuing in nature and require supplemental responses should information unknown to you at the time you serve your responses to these data requests subsequently become known.
- g) For each response, identify all persons (see instruction (j)) that were involved in the preparation of the answers to the interrogatories below and/or are responsible for compiling and providing the information contained in each answer.
- h) Identify which witness(es) at the hearing is competent to adopt and/or discuss the response.
- i) Please produce the requested documents in electronic format to the following individuals:

Joe Childers, joe@jchilderslaw.com
Nathaniel Shoaff, nathaniel.shoaff@sierraclub.org
Kristin Henry, kristin.henry@sierraclub.org
- j) Wherever the response to an interrogatory or request consists of a statement that the requested information is already available to the Sierra Club, provide a detailed citation to the document that contains the information. This citation shall include the title of the document, relevant page number(s), and to the extent possible paragraph number(s) and/or chart/table/figure number(s).
- k) In the event that any document referred to in response to any request for information has been destroyed, specify the date and the manner of such destruction, the reason for such destruction, the person authorizing the destruction and the custodian of the document at the time of its destruction.

- l) Sierra Club reserves the right to serve supplemental, revised, or additional discovery requests as permitted in this proceeding.

REQUESTS FOR INFORMATION

- 2.1 Does Kentucky Power anticipate that it will incur costs at Mitchell 2 to comply with the 2024 Effluent Limitation Guidelines (ELG) rules? If so, please:
 - a) Explain what modifications will be necessary at Mitchell 2 to comply with the 2024 ELG rules.
 - b) Provide the capital expenditures that will be necessary for these modifications, and the year the capital expenditures will be incurred.
 - c) Provide the annual operations and maintenance cost for the environmental modifications once they are completed.
 - d) If Mitchell 2 retires by 2034, could any of the costs in part (b) be avoided? If yes, please specify which of the costs could be avoided. If not, please explain why not.
 - e) If Mitchell 2 is converted by 2034 to burn only gas, could any of the costs in part (b) be avoided? If yes, please specify which of the costs could be avoided. If not, please explain why not.
- 2.2 Regarding capacity expansion modeling:
 - a) Did the Company complete any capacity expansion modeling for this docket? If not, please identify the most recent capacity expansion modeling the Company completed.
 - b) Provide a summary of the scenarios, inputs, and outputs from the most recent capacity expansion modeling identified in part (a).
 - c) What modeling software did the Company use for the modeling described in part (a)?
- 2.3 Regarding production cost modeling:
 - a) Did the Company complete any production cost modeling for this docket? If not, please identify the most recent production cost modeling the Company completed.
 - b) Please identify the source of the production cost modeling results used in KPSC 1-10 Attachments 2–5 in the energy margin calculations.
 - c) Provide data on generation, total generation cost, and energy market revenue for each resource in the most recent production cost modeling identified in part (a).
 - d) What modeling software did the Company use for the modeling described in part (a)?
- 2.4 Please refer to the Company's response to SC 1-12. Please explain in detail what the Company means by, "unit availability was considered in regard to outage requirements or any derates."
- 2.5 With reference to KPSC 1-10, Attachment 3, tab "CC Cost":
 - a) The rate base, energy margins, and net revenue requirement calculations are hard-coded. Provide the underlying calculations with formulas intact.
 - b) Please explain the line item "2029 NBV recovery - ML Plant":
 - i. Explain what this cost category represents.

- ii. Explain how this cost was developed and the source for this estimate.
 - iii. Provide the underlying calculations with formulas intact.
 - iv. Explain why this cost category is not included in the other scenarios.
 - c) Please explain why [REDACTED]
 - d) Do the energy margins in the “CC Cost” tab include all generation from the CC, or only generation in excess of what Kentucky Power needs to serve its own ratepayers?
 - e) Please explain how the Company developed the generation data shown on line 31 of the “CC Cost” tab.
- 2.6 How do energy margins account for energy that Kentucky Power needs to serve its own ratepayers?
- 2.7 With reference to option 2 (retire and replace Mitchell 2) outlined in the direct testimony of Witness Coon:
- a) Provide the nameplate and accredited capacity assumed for the replacement combined cycle plant, and the Company’s reasoning for the size of the plant.
 - b) Explain how the Company developed its capital cost assumption for the combined cycle plant. Include copies of any data sources the Company relied on.
 - c) Explain how the Company developed its operations and maintenance (O&M) cost estimate for the combined cycle plant. Include copies of any data sources the Company relied on.
 - d) Identify the data source(s) and assumptions the Company used to develop its estimates of replacement capacity costs.
 - e) Explain why plant O&M costs are included in the combined cycle revenue requirement (KPSC 1-10 Attachment 3, tab “CC Cost,” line 6) but are excluded for the Mitchell 2 revenue requirements (options 1, 3, and 4, or KPSC 1-10 Attachment 2, 4, and 5, respectively).
- 2.8 Please refer to KPSC 1-10 Attachments 2, 3, and 5:
- a) Describe the "Plant Budgeted Capital Expense" in the "input" tab for 2029 (attachment 4), 2038 (attachment 2), and 2040 (attachments 2, 4, and 5). Are these demolition costs?
 - b) Assuming these are demolition costs, if option 1 includes a full demotion and option 3 includes a partial demolition, why are these costs the same for options 1 and 3?
- 2.9 With reference to the direct testimony of Wolfram at 7, and the Company's response to SC 1-20, which discusses PJM's proposed revisions to how winter capacity is accounted for in its accreditation methodology starting in year 2031/2032:
- a) Please provide the Company's assumptions for how PJM's potential changes to its ELCC accreditation methodology—including how it accounts for winter conditions and correlated outages—will affect ELCC ratings, reserve margins, and capacity obligations.
 - b) Please confirm that the proposed changes to PJM's ELCC ratings (per the ELCCSTF) are included in the accredited capacity assumptions for Mitchell 1, Mitchell 2, Big

Sandy, and the Option 2 combined cycle plant. If not, please provide an updated response to SC 1-18 and SC 1-19.

- 2.10 Please refer to the direct testimony of Wolfram at 7 and the Company's response to SC 1-19(a).
- a) Why is the Company assuming that its winter FPR load obligation will differ from its annual FPR load obligation? Is it the Company's belief that PJM will adopt a seasonal capacity market?
 - b) Why is the Company assuming that its winter load obligation will decrease in 2032/2033 after the initial increase in 2031/2032?

- 2.11 Please refer to the direct testimony of Coon and the discussion therein of energy margins.
- a) Are energy margins returned to ratepayers or are they treated as a source of revenue for the Company's shareholders? Please explain.

b) [REDACTED]

- c) Confirm whether the lost energy margins represent lost profit that the Company would have earned if Mitchell 2 continued to operate at its full, non-derated capacity. If this is incorrect, please explain what the lost energy margins represent.

d) [REDACTED]

- 2.12 Please refer to energy margin calculations in KPSC 1-10 Attachments 2-5 ("Energy Margin" or "NEC forecast inputs" tabs):

[REDACTED]

- 2.13 Provide AEP Service Corporation's most recent Fundamentals Forecast that examines regulatory compliance costs at AEP and/or affiliate generating facilities.

Dated: April 17, 2026

Respectfully submitted,

/s/ Joe F. Childers

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CERTIFICATE OF SERVICE

This is to certify that the foregoing copy of Sierra Club's Second Public Requests for Information to Kentucky Power Company in this action is being electronically transmitted to the Commission on April 17, 2026, and that there are currently no parties that the Commission has excused from participation by electronic means in this proceeding.

/s/ Joe F. Childers
JOE F. CHILDERS