

Kentucky Power Company
KPSC Case No. 2026-00001
Sierra Club's First Set of Data Requests
Dated March 20, 2026

DATA REQUEST

SC 1_1

With reference to Coon Exhibit NMC-1:

- a. Provide a copy of this exhibit in native file format with formulas intact.
- b. Provide all workpapers that Witness Coon used to develop the revenue requirement calculations in this exhibit in native file format with formulas intact.
- c. What is the dollar year of the revenue requirement results presented in this exhibit?
- d. Why does option 1 not include any costs until 2029? Please explain.

RESPONSE

- a. Please see KPCO_R_KPSC_1_10_Attachment1.
- b. Please see KPCO_R_KPSC_1_10_ConfidentialAttachments 2 through 5.
- c. 2025.
- d. As described in Company Witness Coon's Direct Testimony on pages 5 and 6, this option would not go into service until 2029, therefore there is no revenue requirement for it before that timeframe.

Witness: Nicole M. Coon

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DATA REQUEST

SC 1_2 With reference to Coon Exhibit NMC-2: Provide the underlying workpapers used to develop the results in this exhibit in native file format with formulas intact.

RESPONSE

Please see KPCO_R_KPSC_1_11_Attachment1 and KPCO_R_KPSC_1_11_Attachment2.

Witness: Nicole M. Coon

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DATA REQUEST

SC 1_3 With reference to the direct testimony of Coon at 5, which discusses a cost-of-service model that Witness Coon used to prepare the economic analysis: please provide the cost-of-service model for each of the four options analyzed, in native file format with formulas intact and sources clearly identified.

RESPONSE

Please see KPCO_R_KPSC_1_10_ConfidentialAttachments 2 through 5.

Witness: Nicole M. Coon

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DATA REQUEST

- SC 1_4** With reference to the direct testimony of Coon at 5–6, which discusses the capital structure utilized in the economic analysis, please provide:
- a. The capital structure of Kentucky Power
 - b. The capital structure of Wheeling Power
 - c. The combined capital structure of Kentucky and Wheeling Power used in the economic analysis
 - d. The tax rate assumed in the economic analysis

RESPONSE

The Company objects to the extent the request mischaracterizes Company Witness Coon’s Direct Testimony. Without waiving this objection, the Company states as follows:

a-c. Please see the Company’s response to KPSC 1_8.

d. State tax rate was 5.01% and Federal tax rate was 21%. Similar to the capital structures, this calculation can be found in the cost-of-service workbooks.

Witness: Nicole M. Coon

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DATA REQUEST

SC 1_5

With reference to the direct testimony of Coon at 6, which discusses option 2 (retire and replace Mitchell 2), please answer the following questions regarding replacement capacity and energy costs:

- a. Provide the Company's forecasts for replacement capacity and energy costs in each year.
- b. Explain how the Company developed the estimates in part (a). Provide any supporting workpapers, analysis, or studies in native file format with formulas intact.
- c. What quantity of replacement capacity and energy does the Company anticipate it would need to purchase in each year if it pursued this option?
- d. Did Kentucky Power analyze an option to purchase capacity from Mitchell through a power purchase agreement with Wheeling Power through May 2031 (when the combined-cycle plant comes online)? If yes, provide the Company's cost assumption for this option. If not, explain why not.
- e. Did Kentucky Power analyze an option to purchase capacity from any of AEP's other subsidiaries in PJM, given the excess capacity identified in FERC docket ER26-444? If yes, provide the Company's cost assumption for this option, and the time period that the capacity would be available. If not, explain why not.

RESPONSE

The Company objects to the extent the request mischaracterizes Company Witness Coon's Direct Testimony. Without waiving this objection, the Company states as follows:

a.-c. Please see KPCO_R_KPSC_1_10_ConfidentialAttachment3.

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d. The Company had discussions with Wheeling Power over the course of 2025. Importantly, neither Wheeling Power nor any other utility for that matter, would provide the Company with a PPA for service from the Mitchell Plant for an amount that is less than its cost of service. Thus, the cost would actually be that the Company's customers would pay the same amount for the service from the Mitchell Plant but then the Company would not have access to the energy and capacity from the Mitchell Plant after 2031. Additionally, if the Company did enter into a PPA for Mitchell, it would not have the flexibility on options for Mitchell post 2031.

e. The Company objects to the extent the request mischaracterizes information contained in FERC docket ER26-444. Without waiving this objection, the Company states as follows. It is the Company's understanding that the capacity length referenced in that FERC docket was only for PJM delivery year 2026/2027 and the Company does not expect those resources will be available for 2028 given the load growth of the other AEP operating companies who had capacity length for 2026/2027.

Witness: Nicole M. Coon

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DATA REQUEST

- SC 1_6** With reference to the direct testimony of Coon at 7, which discusses option 3 (construct a new mechanical draft cooling tower):
- a. Please explain why this option results in a capacity derate at Mitchell Unit 2.
 - b. Please provide the magnitude of the capacity derate (in MW) and the timeframe for the derate.
 - c. Would the Company need to purchase additional capacity to make up for the derate at Mitchell Unit 2? Explain why or why not.
 - d. If the answer to part (c) is yes, provide the price that the Company assumed for this replacement capacity.
 - e. Please provide the quantity in MWh and the price of the lost energy margin included in Witness Coon's analysis.

RESPONSE

- a. Please see Company Witness Pizzino's Direct Testimony, pages 11, lines 15–22 for an explanation.
- b. Please see KPCO_R_KPSC_1_10_ConfidentialAttachment4 on the "Input" tab cell K4 for the derate in MW, the time frame would be when the new cooling tower goes into service, which is expected to be 2029.
- c. No. Given the relatively small amount of the derate, it would not be necessary to purchase additional capacity to make up for the derate.
- d. N/A.
- e. Please see KPCO_R_KPSC_1_10_ConfidentialAttachment4 on the "NEC Forecast Inputs" tab.

Witness: Nicole M. Coon

Witness: Daniel W. Pizzino

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DATA REQUEST

- SC 1_7** With reference to the direct testimony of Coon at 7–8, which discusses option 4 (continue the exterior reinforcements after reducing the tower's height):
- a. Please explain why this option results in a capacity derate at Mitchell Unit 2.
 - b. Please provide the magnitude of the capacity derate (in MW) and the timeframe for the derate.
 - c. What is the timespan for the outage required for construction and the loss of energy margins in this option?
 - d. Provide the Company's forecasts for replacement capacity and energy prices in each year (or for the period when replacement resources are needed, if less than a year).
 - e. What quantity of replacement capacity and energy does the Company anticipate it would need to purchase in each year or month if it pursued this option?
 - f. Did Kentucky Power analyze an option to purchase capacity from any of AEP's other subsidiaries in PJM, given the excess in capacity as identified in FERC docket ER26-444? If yes, provide the Company's cost assumptions. If not, explain why not.

RESPONSE

- a. Reducing the height of the natural draft cooling tower will decrease the cooling effectiveness since the tower's height is used to generate the required air density difference for the system. The reduced height of the tower would result in a reduction in air flow through the tower and the cooling ability of the system. The ultimate result is a reduced MW output to stay within design limitations.
- b. Please see [KPCO_R_KPSC_1_10_ConfidentialAttachment5](#) on the "Input" tab cell K4 for the derate in MW, the time frame would be when the project was completed, or 2028.

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c. Please see Table SPM-1 in Company Witness Malone's Direct Testimony, which states the outage length of 6+ months. The loss of energy margins once the shorter tower is in service is calculated in KPCO_R_KPSC_1_10_ConfidentialAttachment5 on the "NEC Forecast Inputs" tab.

d. Replacement capacity and energy costs during the outage are included in KPCO_R_KPSC_1_10_ConfidentialAttachment5 on the "Cash Flow of U2" tab starting in Row 9.

e. The Company interprets this question to be asking about replacement capacity for the derate of the unit after the project is completed. Given the small nature of the derate, the Company did not consider replacement capacity costs in the option as the Company does not believe replacement capacity will be needed.

f. Please see the Company's response to SC 1_5 subpart e.

Witness: Nicole M. Coon

Witness: Daniel W. Pizzino (subpart a)

Witness: Shawn P. Malone (subpart c)

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SC 1_8 Please explain what the Company means by "energy margin" as referenced in the direct testimony of Coon.

RESPONSE

Please see the Company's response to KPSC 1_7.

Witness: Nicole M. Coon

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DATA REQUEST

- SC 1_9** Refer to the direct testimony of Coon at 12, which states that, "in terms of an economic decision, the Company chose to use a 25-year [depreciable] life as that aligns with the cooling tower's useful life." Also refer to the direct testimony of Wolfram at 16, which states that "a basic 8.33% depreciation rate (or 1/12 years) is reflected in Exhibit NMC-1."
- a. Please reconcile these two statements.
 - b. Please confirm what depreciable life Kentucky Power assumed for the mechanical draft cooling tower in Witness Coon's economic analysis (Exhibit NMC-1).
 - c. Please confirm what depreciable life Kentucky Power assumed for the mechanical draft cooling tower in Witness Coon's rate impact analysis (Exhibit NMC-2).
 - d. If the responses to parts (b) and (c) are different, please explain why.

RESPONSE

The Company objects to the extent the request mischaracterizes Company testimony. Without waiving this objection, the Company states as follows:

- a. Company Witness Wolfram's Direct Testimony should have referenced Exhibit NMC-2, rather than Exhibit NMC-1. NMC-2 is the rate impact analysis and used the 8.33% depreciation rate referenced in Company Witness Wolfram's Direct Testimony at 16. Moreover, please see the explanation in Company Witness Coon's Direct Testimony at page 12, lines 4-9 and 12-23.
- b. The depreciable life in Exhibit NMC-1 for the Mitchell Cooling Tower Project is 25 years, as stated in Company Witness Coon's Direct Testimony on page 7.
- c. The depreciable life in Exhibit NMC-2 for the Mitchell Cooling Tower Project is 12 years, as stated in Company Witness Coon's Direct Testimony on page 12.
- d. Please see the Company's response to subpart a.

Witness: Nicole M. Coon

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DATA REQUEST

SC 1_10 Provide the following data for Mitchell Unit 2 for each year 2027–2040 for each of the four options in Coon Exhibit NMC-1:

- a. Nameplate capacity (MW)
- b. Accredited capacity (MW)
- c. Annual generation (MWh)
- d. Sustaining capital expenditures (\$/year)
- e. Fixed operations and maintenance (\$/year)
- f. Non-fuel variable operations and maintenance (\$/MWh)
- g. Heat rate (MMBtu/MWh)
- h. Fuel cost (\$/MMBtu)
- i. Forced or random outage rate

RESPONSE

The Company objects that the request is vague. Without waiving this objection, the Company states as follows. For purposes of this request, the Company assumes that it is requesting the information that was relied upon to support the analysis set forth in Exhibit NMC-1. Please see KPCO_R_SC_1_10_ConfidentialAttachment1.

Witness: Nicole M. Coon

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DATA REQUEST

- SC 1_11** Provide the following historical data for Mitchell Unit 2 for each year 2020–2025:
- a. Nameplate capacity (MW)
 - b. Accredited capacity (MW)
 - c. Annual generation (MWh)
 - d. Sustaining capital expenditures (\$/year)
 - e. Fixed operations and maintenance (\$/year)
 - f. Non-fuel variable operations and maintenance (\$/MWh)
 - g. Heat rate (MMBtu/MWh)
 - h. Fuel cost (\$/MMBtu)
 - i. Forced or random outage rate

RESPONSE

Please see KPCO_R_SC_1_11_Attachment1.

Witness: Joshua D. Snodgrass

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DATA REQUEST

SC 1_12 How did Kentucky Power account for the increasing age of Mitchell Unit 2 in its projections of sustaining capital expenditures and unit availability assumed in Coon Exhibit NMC-1?

RESPONSE

The Company objects to this question on the basis that it is inflammatory in language and assumes facts not in evidence. Without waiving these objections, the Company states as follows. Please see Company Witness Coon's Direct Testimony at page 8, lines 20-23 and page 9, lines 1-8 in regard to future capital expenditures. Unit availability was considered in regard to outage requirements or any derates.

Witness: Nicole M. Coon

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DATA REQUEST

- SC 1_13** Regarding environmental compliance costs at Mitchell Unit 2:
- a. What environmental compliance costs does Kentucky Power anticipate at Mitchell Unit 2 under each of the four options the Company analyzed?
 - b. Please explain how Witness Coon's economic analysis accounts for upcoming environmental compliance costs in each of the four options.

RESPONSE

The Company objects that the request is vague, overly broad, and undefined. The Company further objects that the request calls for the Company to speculate about future environmental regulations. Without waiving these objections, the Company states as follows.

- a. & b. The economic analysis analyzes the options to address the cooling tower needs and not the future environmental compliance costs of Mitchell Unit 2.

Witness: Nicole M. Coon

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DATA REQUEST

- SC 1_14** With reference to the direct testimony of Coon at 6, which discusses option 2 (retire and replace Mitchell 2), please answer the following questions about the new combined-cycle gas plant:
- a. What capital cost did the Company assume for the new gas combined-cycle plant? Provide the source of this estimate, including any supporting workpapers or analyses in their native file format with formulas intact.
 - b. Does the Company plan to obtain firm gas transportation for the combined-cycle plant? If so, what costs did the Company assume for gas transportation?
 - c. How did the Company decide on a commercial operation date of May 2031 for the combined-cycle plant? Please explain.
 - d. What depreciation life and useful life does the Company assume for the combined-cycle plant?
 - e. What portion of the \$1,044 million capital cost cited by Witness Coon is for the combined-cycle plant and what portion is for demolition?

RESPONSE

- a. Please see KPCO_R_KPSC_1_5_Attachment2 and KPCO_R_KPSC_1_10_ConfidentialAttachment3.
- b. The Company has not proposed to pursue this option, so there is not a current plan for obtaining gas transport for the combined-cycle plant. For purposes of the economic analysis, the Company assumed approximately \$13 million annually for gas transportation costs.
- c. This estimate is based on the Company's best current estimates of time required to complete the following non-exhaustive tasks: permitting, interconnection with PJM, acquiring equipment, and construction.
- d. The Company used 35 years for both depreciation life and useful life.

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e. Please see KPCO_R_KPSC_1_5_Attachment2.

Witness: Nicole M. Coon

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DATA REQUEST

- SC 1_15** With reference to Coon Exhibit NMC-1, provide the following data for the new gas combined-cycle plant in option 2 for each year 2031–2040:
- a. Nameplate capacity (MW)
 - b. Accredited capacity (MW)
 - c. Annual generation (MWh)
 - d. Sustaining capital expenditures (\$/year)
 - e. Fixed operations and maintenance (\$/year)
 - f. Non-fuel variable operations and maintenance (\$/MWh)
 - g. Heat rate (MMBtu/MWh)
 - h. Fuel cost (\$/MMBtu)
 - i. Forced or random outage rate

RESPONSE

The Company did not undertake the requested analysis. Please see KPCO_R_KPSC_1_10_ConfidentialAttachment3 on the “CC cost” tab for cost items included in the revenue requirement.

Witness: Nicole M. Coon

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DATA REQUEST

- SC 1_16** Refer to the direct testimony of Coon at 11, which states that, "there are several differences between the inputs for the economic analysis revenue requirement calculated in October 2025 to provide relative costs for decision making purposes and the rate impact revenue requirement calculated for this Application using updated information."
- a. Do the results presented in Exhibit NMC-1 reflect the October 2025 revenue requirement results or the updated revenue requirement results used in the rate impact analysis for this docket? Please explain.
- b. Provide both the October 2025 revenue requirement results and the updated "rate impact revenue requirement" for all four options at Mitchell Unit 2, including all supporting workpapers with formulas intact.
- c. Summarize how the changes since October 2025 affect the revenue requirement results for the four options at Mitchell Unit 2.

RESPONSE

- a. Exhibit NMC-1 reflects the October 2025 revenue requirements results.
- b. The October 2025 analysis can be found in the attachments provided in response to KPSC 1_10. The Company did not update revenue requirements for options 1, 2, and 4 after October 2025. As described in Company Witnesses Coon and Wolfram's Direct Testimonies, the decision was made on November 6th, 2025, to move forward with the new mechanical draft cooling tower, as such, performing updated analysis for those options post decision was not necessary.
- c. The Company did not update options 1, 2, and 4 after October 2025. The revenue requirement used for the rate impact of Option 3 is higher than the economic analysis, driven by the shorter depreciable life utilized in the rate impact cost-of-service.

Witness: Nicole M. Coon

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DATA REQUEST

SC 1_17 With reference to the direct testimony of Coon at 11, which discusses the estimated rate impact of the Mitchell Cooling Tower Project. Has Kentucky Power analyzed the rate impact of the other options considered in Coon Exhibit NMC-1? If so, please provide these analyses and all supporting workpapers in their native file format with formulas intact. If not, please explain why not.

RESPONSE

The Company objects to the extent the request mischaracterizes Company Witness Coon's Direct Testimony. Without waiving this objection, the Company states as follows. The Company has not performed a rate impact analysis for the other options. Please see the Company's response to SC 1_16 subpart b.

Witness: Nicole M. Coon

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DATA REQUEST

- SC 1_18** With reference to the direct testimony of Wolffram at 7–8:
- a. Provide the load and resources data shown in figures TSW-1 and TSW-2 in excel, with formulas intact.
 - b. Please explain why the Company expects its load obligation to increase starting in the winter of 2031/2032.
 - c. How does the Company intend to fill the capacity shortfall shown in figure TSW-1 starting in the winter of 2031/2032?

RESPONSE

- a. Please see KPCO_R_SC_1_18_Attachment1 and KPCO_R_SC_1_18_Attachment2.
- b. Please refer to Company Witness Wolffram’s Direct Testimony at page 7, specifically footnote 1. As explained there, the Company understands that PJM has initiated a process to review and potentially add a winter capacity requirement beginning in the 2029-2031 timeframe. The increase in capacity obligation in Figure TSW-1 assumes a winter capacity requirement starting in PJM Planning Year 2031/2032.
- c. The Company plans to fill its winter capacity needs by constructing new generation, securing purchase power agreements, short-term bi-lateral capacity purchases, or some combination of the three depending on the timing of the winter capacity obligation changes. Additionally, as the Company has stated in multiple dockets, it plans to submit an application for a new 450 MW CT generation facility at the Big Sandy site, which is anticipated to be online for PJM Planning Year 2031/2032.

Witness: Tanner S. Wolffram

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DATA REQUEST

SC 1_19 Regarding Kentucky Power’s load and resources position:

- a. For each year 2026–2040, provide data on Kentucky Power’s load and resources position, including:
 - i. Peak load
 - ii. Reserve margin
 - iii. Nameplate capacity of each resource in Kentucky Power’s portfolio
 - iv. Accredited capacity of each resource in Kentucky Power’s portfolio

- b. Explain how the data in part (a) would differ under the four options Kentucky Power considered for Mitchell Unit 2, including the effects of any unit derates, retirements, and new resource builds.

RESPONSE

- a. Please see KPCO_R_SC_1_19_Attachment1 for the requested information.
- b.

Option	Impact to Mitchell Units	Capacity Position Impact	Timing / Planning Year
Option 1	No impact to Mitchell Units 1 or 2	No change to the capacity position	N/A
Option 2	Loss of Mitchell Unit 2	Approximately 300 MW capacity shortfall until a new resource can be built	Beginning in 2028 New resource 2031
Option 3	Minimal derate upon completion	Minimal change to the capacity position	N/A
Option 4	Loss of Mitchell Unit 2 for construction and derate	Approximately 308 MW capacity shortfall Additional minimal change to capacity position after completion of project	2026/2027 or 2027/2028 , depending on timing of the six-month outage

Witness: Tanner S. Wolfram

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DATA REQUEST

- SC 1_20** With reference to the direct testimony of Wolffram at 7, which discusses PJM's proposed revisions to how winter capacity is accounted for in its accreditation methodology starting in year 2029/2030:
- a. Please explain Kentucky Power's understanding of how the proposed revision will affect its capacity position in more detail.
 - b. Has this change been approved by FERC? If so, please provide the docket number.
 - c. Please identify the stakeholder committee/forum and date when PJM presented this proposal to stakeholders, as well as any additional follow-up presentations or materials from PJM on this topic.

RESPONSE

The Company objects to the extent the request mischaracterizes Company Witness Wolffram's Direct Testimony. Without waiving this objection, the Company states as follows:

- a. As shown in Figure TSW-1, to meet a winter capacity requirement, the Company would need to add capacity, starting in PJM planning years 2031/2032. To the extent a winter capacity requirement is instituted earlier, the Company would be in a similar capacity position.
- b. Currently, PJM has not submitted any filing to FERC regarding proposed changes to incorporate winter capacity into the ELCC accreditation methodology for the 2029/2030 Delivery Year. Because no filing has been made, there is no associated FERC docket number, and no action has been taken or approved by FERC. PJM has indicated that, due to competing internal priorities, there are currently no new updates on ELCC methodology revisions or winter capacity planning.
- c. The following reference links are materials PJM presented at the Effective Load Carrying Capacity Senior Task Force (ELCCSTF). These documents correspond to the specific meeting dates noted within the presentation materials. The ELCCSTF is the stakeholder forum where PJM discussed and provided updates related to this proposal.

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<https://www.pjm.com/-/media/DotCom/committees-groups/task-forces/elccstf/2025/20250725/20250725-item-03d---elccstf-accreditation-reforms---pjm-solution-package.pdf>

<https://www.pjm.com/-/media/DotCom/committees-groups/task-forces/elccstf/2025/20250725/20250725-item-03d---pjm-proposal---executive-summary.pdf>

<https://www.pjm.com/-/media/DotCom/committees-groups/task-forces/elccstf/2025/20251209/20251209-item-02---e3-evaluation-of-the-pjm-elcc-rss-model---e3-presentation.pdf>

<https://www.pjm.com/-/media/DotCom/committees-groups/task-forces/elccstf/2025/20251209/20251209-item-02---pjm-elcc-rrs-model-evaluation---e3-report.pdf>

Witness: Tanner S. Wolfram

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DATA REQUEST

- SC 1_21** Regarding the capacity position of other AEP utilities in PJM:
- a. Please provide load and resources data for the other AEP subsidiaries in PJM (Appalachian Power, Indiana Michigan Power, and Wheeling Power) for each year 2026–2040.
 - b. Given AEP’s current excess capacity, as identified in FERC docket ER26-444, has Kentucky Power considered purchasing capacity from other AEP affiliates? Explain why or why not.

RESPONSE

- a. The Company objects to this request as it is outside the scope of this proceeding and is not within the Company’s possession. The Company further objects that it is not or likely to lead to the discovery of admissible information.
- b. The Company objects to the extent the request mischaracterizes information contained in FERC docket ER26-444. Without waiving this objection, the Company states as follows. It is the Company’s understanding that the capacity length referenced from that FERC docket was only for PJM delivery year 2026/2027 and the Company does not expect those resources will be available for 2028 given the load growth of the other AEP operating companies who had capacity length for 2026/2027.

Respondent: Counsel (subpart a)

Witness: Tanner S. Wolfram (subpart b)

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DATA REQUEST

SC 1_22 With reference to the direct testimony of Wolffram at 9: Please provide copies of all communications provided to Kentucky Power President Wiseman and Appalachian Power Company President Walker about “possible paths forward” at Mitchell Unit 2.

RESPONSE

The Company objects that the request is vague, overly broad, and unduly burdensome. The Company further objects to the extent the request seeks information that is protected by the work product and attorney-client privilege doctrines. Without waiving these objections, the Company states as follows. Please see Exhibit TSW-1 for the Mitchell Operating Committee meeting minutes related to decisions made regarding Mitchell Unit 2.

Witness: Tanner S. Wolffram

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DATA REQUEST

- SC 1_23** With reference to the direct testimony of Wolffram at 13, which gives an estimate of \$191 million for the capital cost of the Mitchell Cooling Tower Project:
- a. What is the dollar year of this estimate?
 - b. Please provide a budget table that breaks down this total amount by category.
 - c. What is Kentucky Power's estimate of construction financing costs for the Mitchell Cooling Tower Project, and are these costs included in the \$191 million total?
 - d. What is the AACE class level of this cost estimate?

RESPONSE

- a. 2025.
- b. The Company objects that the term “category” is vague and undefined. Without waiving this objection, the Company states as follows. Please see KPCO_R_KPSC_1_5_Attachment1 which shows the budget in October 2025, and KPCO_R_KPSC_1_5_Attachment2 which shows the adjustments made from the October 2025 numbers to the final \$191 million referenced in Company Witness Wolffram’s Direct Testimony.
- c. Please see KPCO_R_KPSC_1_5_Attachment2 which includes the estimated AFUDC. KPCO_R_KPSC_1_7_Attachment2 has the calculated CWIP. As explained in the Company’s responses to AG-KIUC 1_1 through 1_4 and KPSC 1_25, the Company only proposed to recover CWIP, which is included in the \$191 million total.
- d. The class cost estimate was Class IV.

Witness: Tanner S. Wolffram

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DATA REQUEST

- SC 1_24** With reference to Malone Exhibit SPM-2:
- a. Please provide this exhibit and all supporting workpapers in native file format with formulas intact.
 - b. What is the dollar year of the results presented in this exhibit?

RESPONSE

- a. Please see KPCO_R_SC_1_24_Attachment1. Company Witness Malone did not prepare workpapers to prepare Exhibit SPM-2. The information came from detailed project feasibility study included as Exhibit SPM-1.
- b. The exhibit used 2025 dollars as the basis and appropriate escalation factors were applied and reflected over the life of the construction phase of the project.

Witness: Shawn P. Malone

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DATA REQUEST

- SC 1_25** With reference to the direct testimony of Malone at 5, Table SPM-1:
- a. What is the dollar year of the values in Table SPM-1?
 - b. Explain the difference between the "full demo" in option 1 and the "partial demo" in the other options.
 - c. Explain why "full demo" costs only \$3M while "partial demo" costs \$29M.
 - d. In option 3, how long does Kentucky Power expect that Mitchell Unit 2 would be offline for the tie in outage?

RESPONSE

- a. Table SPM-1 used 2025 dollars as the basis and appropriate escalation factors were applied and reflected over the life of the construction phase of the project.
- b. "Full Demo" refers to removal in place of the cooling tower through implosion. "Partial Demo" refers to selective demolition of the top 120 feet of the cooling tower utilizing tools and equipment.
- c. The cost estimates were provided by the demolition contractor assigned to the site. The \$3 million estimate for implosion reflects a single, short-duration method that brings the entire structure down and removes debris in bulk. The \$29 million estimate for selective demolition reflects a much more time-consuming and labor-intensive process: the remaining structure must be temporarily reinforced; specific structural members must be cut in a controlled, sequenced manner; large panels must be rigged, lifted by crane, and disassembled at ground level; and all work must be conducted within a physically constrained area of an active, operating generation plant. Those factors—extended duration, greater labor and equipment requirements, complex rigging and sequencing, constrained site logistics, and associated safety and plant-protection measures—account for the cost difference.

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d. The Company estimates that the tie in outage would require Mitchell Unit 2 to be offline for approximately 10 weeks and that tie-in will occur during an otherwise scheduled and PJM-approved outage.

Witness: Shawn P. Malone

Witness: Daniel W. Pizzino

DATA REQUEST

- SC 1_26** With reference to the direct testimony of Malone at 5, Table SPM-1, discussion of option 1 (exterior shell remediation):
- a. Please explain why option 1 entails a "High Risk of Cost and schedule overruns" compared to the other options.
 - b. Please explain why option 1 entails "worst condition of tower still to come" compared to the other options.
 - c. Does the "\$136M remaining" in incremental capital costs include any additional capital costs beyond what the Company budgeted for the Initial Repair Project? Please explain.
 - d. Given the issues the Company encountered with the Initial Repair Project, does the Company anticipate that expenditures above the "\$136M remaining" would be necessary to pursue Option 1 and operate the existing cooling tower for an additional ten years? Please explain.

RESPONSE

a. & b. The repairs to date, as described in Company Witness Pizzino's Direct Testimony, addressed only the lower portion of the tower where localized exposed rebar and cracking were observed. They did not remediate the critical areas of the Mitchell Unit 2 cooling tower shell, which display multiple surface irregularities and deformations that have materially weakened the structure. Engineering analysis of the Mitchell Unit 2 cooling tower documents a reduced structural capacity and concludes that repair or replacement is required. The tower continues to deteriorate.

For these reasons, Option 1 presents a high risk of cost and schedule overruns compared with the other options:

- Unrepaired, weakened portions of the shell are likely to deteriorate further during work, revealing additional damage and expanding the required scope of work.
- Reduced structural capacity increases the probability of encountering immediate safety or stability issues that require unplanned temporary shoring, emergency repairs, or work stoppages, all of which extend the schedule and increase cost.

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- The current condition of the structure necessitates enhanced monitoring, more extensive temporary protection, and conservative contractor contingencies, each adding time and expense.
- The combination of unknown or latent defects, may lead to change orders, and needed contingency measures makes cost and schedule outcomes for Option 1 significantly less predictable than for the other options

c. The \$136M remaining in incremental capital costs represents the amount beyond the initial repair project already invested.

d. The Company does not anticipate expenditures above \$136M. However, as noted in the response to a. and b. above, once repairs begin to be made “[t]he combination of unknown or latent defects, may lead to change orders, and needed contingency measures makes cost and schedule outcomes for Option 1 significantly less predictable than for the other options.”

Witness: Shawn P. Malone

Witness: Daniel W. Pizzino

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DATA REQUEST

SC 1_27 With reference to the direct testimony of Pizzino at 11, which discusses auxiliary power use of the fans in the draft cooling tower: What is the magnitude of this auxiliary power use?

RESPONSE

Please see the Company's response to SC 1_6 subpart b.

Witness: Daniel W. Pizzino

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DATA REQUEST

SC 1_28 Please identify and produce the most recent depreciation study for the Mitchell plant.

RESPONSE

A summary of the Company's most recent depreciation study, along with a copy of the study itself, is contained in the testimony and exhibits of Company Witness Spanos in the Company's most recently filed base rate case, Case No. 2025-00257. Current Mitchell depreciation rates were approved as part of the order issued in Case No. 2025-00257 and modified the depreciation rates that were last approved to be used for Mitchell in Case No. 2017-00179. Company Witness Spanos's testimony and exhibits included in Case No. 2025-00257 suggested an update to depreciation rates for Mitchell in the most recent base case; however, as explained in the Company Witness Wolfram's Direct Testimony in that proceeding, the Company did not propose to update its depreciation rates for Mitchell in that case.

Witness: Tanner S. Wolfram

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DATA REQUEST

SC 1_29 Please provide the date of the most recent RFP or bid that Kentucky Power issued for new generating resources and summarize the results of the RFP.

RESPONSE

The Company objects to this request on the basis that it is not reasonably calculated to lead to the discovery of admissible evidence in this proceeding. Without waiving this objection, the Company states as follows. On September 22, 2023, the Company issued an all-source request for proposals (“RFP”) to identify potential Power Purchase Agreements (“PPA”) to address the Company’s current and future capacity needs. The Company selected one project from the RFP bids, the Bright Mountain REPA, as an initial step towards addressing a portion of the Company’s energy and capacity needs, which was the subject of the Company’s Application in Case No. 2024-00243. The Commission ultimately denied the Company’s application.

The Company also evaluated multiple PPA bids from thermal resources as part of the 2023 RFP, which lead to negotiations with one counterparty, but those negotiations were ultimately terminated. The Company then filed an application to extend its interest in the Mitchell Plant, which was approved in Case No. 2025-00175.

Witness: Tanner S. Wolfram

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DATA REQUEST

- SC 1_30** Regarding a possible coal-to-gas conversion at Mitchell Unit 2:
- a. Did the Company consider gas conversion as an option in its economic analysis for this docket? Explain why or why not.
 - b. What type of cooling tower would Mitchell Unit 2 require after conversion to gas?
 - c. Could Kentucky Power avoid any costs associated with the Mitchell Cooling Tower Project by converting the unit to gas? Please explain.
 - d. Provide all analysis or studies in Kentucky Power's possession about the cost to convert Mitchell Unit 2 to gas, the cost and feasibility of obtaining firm gas service at the Mitchell site, and the projected capacity factor of the unit after conversion.

RESPONSE

The Company objects to this request on the basis that it is not reasonably calculated to lead to the discovery of admissible evidence in this proceeding. The Company further objects to this request as its outside the scope of this proceeding Without waiving these objections, the Company states as follows:

a-d. No, that analysis would not be appropriate for this application because the Company could not convert Mitchell Unit 2 without a cooling tower. Thus, the Company's options were to address the structural needs of the Unit 2 cooling tower, or, retire that unit and replace it with another resource. Mitchell Unit 2 would require the same design cooling tower no matter what fuel source is utilized with the steam generator. A cooling tower will still be required if Mitchell Unit 2 is converted to gas or remains coal fired.

Witness: Daniel W. Pizzino (subparts b & c)

Witness: Tanner Wolfram (subpart a)

Respondent: Counsel (subpart d)

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DATA REQUEST

SC 1_31 Regarding the Mitchell power plant's compliance with the 2020 and 2024 Effluent Limitation Guidelines (ELG) Rules:

- a. What are the total expected capital costs associated with ELG compliance at Mitchell (including all prior, current, and future ELG capital costs)? Please provide documentation showing an itemized breakdown of the ELG-related capital costs at Mitchell, and Kentucky Power's timeline for incurring its share of those costs.
- b. What are the total expected operations & maintenance ("O&M") costs associated with ELG compliance at Mitchell (including all prior, current, and future ELG O&M costs)? Please provide all documentation showing an itemized breakdown of the ELG-related O&M costs at Mitchell, and Kentucky Power's timeline for incurring its share of those costs.
- c. Under option 2 (retire and replace Mitchell Unit 2), could any of the costs in part (a) and (b) be avoided? If yes, please specify which of the costs could be avoided. If not, please explain why not.
- d. If the Mitchell power plant is converted by 2034 to burn only gas, could any of the costs in part (a) and (b) be avoided? If yes, please specify which of the costs could be avoided. If not, please explain why not.

RESPONSE

The Company objects to this request on the basis that it is not reasonably calculated to lead to the discovery of admissible evidence in this proceeding. Furthermore, the Company objects to this request as irrelevant because the Mitchell Plant is currently compliant with the 2020 ELD Rule. Subject to and without waiving these objections, the Company is not seeking recovery of ELG projects within the context of this proceeding. Additionally, if Mitchell is converted to burn gas, a structurally sound cooling tower will be needed.

Witness: Shawn P. Malone

VERIFICATION

The undersigned, Nicole M. Coon, being duly sworn, deposes and says she is a Regulatory Consultant Principal for American Electric Power Service Corporation, that she 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 her information, knowledge, and belief.

Nicole M. Coon

Nicole M. Coon

_____)
_____)
_____)

Case No. 2026-00001

Subscribed and sworn to before me, a Notary Public in and before said County and State, by Nicole M. Coon, on 3/28/28.

[Signature]

Notary Public

My Commission Expires Never

Notary ID Number No ID



Paul D. Flory
Attorney At Law
Notary Public, State of Ohio
My commission has no expiration date
Sec. 147.03 R.C.

VERIFICATION

The undersigned, Shawn P. Malone, being duly sworn, deposes and says he is the Director of Projects for American Electric Power Service Corporation, 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.

Shawn P. Malone

Shawn P. Malone

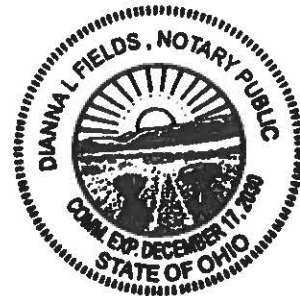
State of Ohio)
County Franklin)

Case No. 2026-00001

Subscribed and sworn to before me, a Notary Public in and before said County and State, by Shawn P. Malone, on March 27, 2026.

Dianna L. Fields

Notary Public



My Commission Expires Dec, 11, 2030

Notary ID Number 2025-RE-897557

VERIFICATION

The undersigned, Daniel W. Pizzino, being duly sworn, deposes and says he is the Director of Generation Engineering for American Electric Power Service Corporation, 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.

[Handwritten signature of Daniel W. Pizzino]

Daniel W. Pizzino

State of Ohio)
County Franklin)

Case No. 2026-00001

Subscribed and sworn to before me, a Notary Public in and before said County and State, by Daniel W. Pizzino, on March 24, 2026.

[Handwritten signature of Dianna L. Fields]
Notary Public



My Commission Expires December 17, 2030

Notary ID Number 2025-RE-897557



