

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

April 22, 2026 Supplemental Response

The Company renews its objection that this request is vague, overly broad, and undefined. The Company further objects to this request on the basis that it is not reasonably calculated to lead to the discovery of admissible evidence in this proceeding and that the request calls for the Company to speculate about future environmental regulations. Without waiving these objections, the Company states as follows.

- a. The Company provided environmental compliance cost information for each of the future environmental compliance options for continuing operation of the Mitchell Plant as a whole in response to Sierra Club's Post-Hearing Data Request No. 4 in Case No. 2025-00175 which is incorporated by reference into this proceeding. The Commission approved the Company's application to continue taking service from the Mitchell Plant after 2028 in Case No. 2025-00175 by order dated December 30, 2025. Because the economic analysis of the options for addressing the structural needs of the Mitchell Unit 2 Cooling Tower are independent of speculative future environmental compliance costs

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at the Mitchell Plant as a whole, the Company did not and was not required to conduct any additional analysis for the individual options evaluated for this case.

Witness: Nicole M. Coon

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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)

April 22, 2026 Supplemental Response

The Company renews its objection 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:

d. The Company has not performed any updated analysis regarding the conversion of Mitchell Unit 2 to gas. In Case No. 2025-00175, the Company presented options for compliance with then existing Effluent Limitation Guidelines (“ELG”) and the Greenhouse Gas Standards in the Direct Testimony of Alex Vaughan, Confidential Table AEV-2 which is incorporated by reference into this proceeding. These options included conversion of the Mitchell Plant from a coal-fired steam generating system to a natural gas-fired steam generating system.

On June 17, 2025, USEPA proposed two options to revise the 2024 GHG Standards. The “primary” proposal would repeal the 2024 standards altogether. The “alternative” proposal would repeal the requirements related to carbon capture and may refine the subcategories for new combustion turbines. USEPA is expected to finalize the revisions in 2026. On April 13, 2026, the USEPA published notice in the Federal Register that it was proposing to modify the existing legacy coal combustion residuals surface impoundment rule. The Company has not updated the analysis of those options under the proposed revised rules.

Witness: Tanner Wolfram

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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

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The Company renews its objection 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 ELG Rule. Subject to and without waiving these objections, the Company responds as follows:

d. The Company provided this information for the Mitchell Plant as a whole in response to Sierra Club's Post-Hearing Data Request No. 4 in Case No. 2025-00175 which is incorporated by reference into this proceeding. The Company has not performed any additional analysis.

Witness: Nicole M. Coon

VERIFICATION

The undersigned, Nicole M. Coon, being duly sworn, deposes and says she is a Regulatory Consultant Staff 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

State of Ohio)
County of Franklin)

Case No. 2026-00001

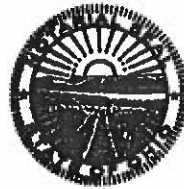
Subscribed and sworn to before me, a Notary Public in and before said County and State, by Nicole M. Coon, on April 21, 2026

CA Frankart

Notary Public

My Commission Expires Has no expiration

Notary ID Number 2025-AT-897466



Christine Alaine Frankart
Attorney At Law
Notary Public, State of Ohio
My commission has no expiration date
Sec. 147.03 R.C.

VERIFICATION

The undersigned, Tanner S. Wolfram, being duly sworn, deposes and says he is the Director of Regulatory Services for Kentucky Power, 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.

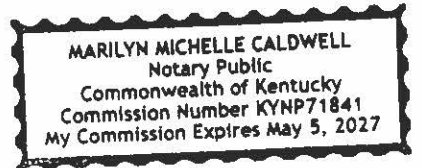
Tanner S. Wolfram
Tanner S. Wolfram

Commonwealth of Kentucky)
County of Boyd)

Case No. 2026-00001

Subscribed and sworn to before me, a Notary Public in and before said County and State, by Tanner S. Wolfram, on April 21, 2026.

Marilyn Michelle Caldwell
Notary Public



My Commission Expires May 5, 2027

Notary ID Number KYNP 71841