

Kentucky Power Company
KPSC Case No. 2026-00001
Commission Staff's Third Set of Data Requests
Dated June 22, 2026

DATA REQUEST

KPSC 3_1 Refer to Kentucky Power's Response to Commission Staff's First Request for Information (Staff's First Request), Item 19.

a. Provide the engineering analysis report that supports the 10-year service life after implementing Option 1 (Expand and extend the exterior shell reinforcement project) and Option 4 (Reduce the height of the existing cooling tower and continue with a reduced scope of exterior shell reinforcement.)

b. Explain the feasibility of extending the service life from 10 years to 12 years (through 2040) by carrying out maintenance and repair projects after the initial 10-year period and provide an estimate of the associated costs.

RESPONSE

a. The estimated service life of Options 1 and 4 is based on engineering judgment, considering the materials that would be used, the extent of the repairs, and service conditions associated with the Mitchell Unit 2 Cooling Tower. No "engineering analysis report" was necessary to estimate the 10-year service life.

b. As described in the Company's response to subpart (a), the 10-year service life for Options 1 and 4 represents an estimated useful life based on engineering judgment considering the conditions of the Mitchell Unit 2 Cooling Tower. If the Company were to proceed with Options 1 or 4, the structure would require re-evaluation before the end of the 10-year period to assess its remaining service life and identify any required maintenance or repairs that may be needed. The scope and costs associated with such work, if any, cannot be reasonably determined until closer to the end of the estimated service life. Accordingly, proceeding with either of these options presents the risk of higher costs than those estimated.

Witness: Daniel W. Pizzino

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DATA REQUEST

- KPSC 3_2** Refer to Staff's First Request, Items 5, 7, 10, 11, and 12, and all attachments.
- a. Explain why the initial repair cost of \$3,761,452 is not included in all options in "KPCO_R_KPSC_1_5_Attachment1" given that this cost has already been incurred and is expected to be recovered.
 - b. Provide an updated revenue requirement analysis for all options covering the period from 2027 through 2040, including all capital and operating costs.
 - c. For subpart (b), provide the supporting calculations for both the 10-year and 12-year service life assumptions for Options 1 and 4.
 - d. For subparts (b) and (c), apply both 12-year and 25-year depreciation lives to Option 3.

RESPONSE

- a. This cost reflects part of the remaining work for the Initial Repair Project that had not been completed at the time the Initial Repair Project was paused. It reflects work that had not been completed, but would need to be completed for Option 1.
- b-d. The Company cannot provide the requested information. As described in the Company's response to KPSC 3-1(b), the Company, based on its engineering judgment considering the conditions of the Mitchell Unit 2 Cooling Tower, expects that additional maintenance, repairs, or replacement may be required after 10 years of service. The Company does not know the scope or cost of those repairs or replacements and cannot perform the analysis, increasing the cost risks associated with those options.

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In addition to the unknown costs after 2038, Options 1 and 4 present the highest qualitative risks for the Company and its customers regarding the short- and long-term operation of the Unit 2 Cooling Tower and Mitchell Unit 2. These risks are avoided with Option 3 which, in addition to being cost-competitive (particularly in light of the DOE award), provides the Company and its customers with operational certainty in the short-term and viable options for the future operation of Mitchell Unit 2. The Company performed the analysis requested in subpart (d) and presented that analysis in Table NMC-R1 in Company Witness Coon's Rebuttal Testimony.

Witness: Shawn P. Malone (a)

Witness: Nicole M. Coon (b-d)

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KPSC 3_3 Refer to Kentucky Power's Response to Commission Staff's Second Request for Information (Staff's Second Request), Item 12. Explain whether Kentucky Power analyzed implementing Options 3 and 4 together.

RESPONSE

The Company did not analyze implementing Options 3 and 4 together. Implementing these two options together is not expected to provide any cost or operational benefit. In fact, installing Option 3 and Option 4 would result in two separate cooling tower systems for Mitchell Unit 2 which would be more costly than either option separately, and would add additional, unnecessary complexity to the operation of the Mitchell Plant.

Witness: Daniel W. Pizzino

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DATA REQUEST

KPSC 3_4 Refer to the Application generally. Provide the net-book value of Mitchell Cooling Tower 2, along with its historical depreciation expense. Include explanations for any material changes, such as revisions to depreciation rates, capital projects, or other factors that affected the cooling tower's useful life in Excel spreadsheet format with all formulas, rows, and columns fully accessible and unprotected.

RESPONSE

In accordance with FERC accounting, individual components of the original construction of the Mitchell Plant were not accounted for separately. Any new construction subsequent to the original Plant construction has been tracked by a work order tied to a specific FERC utility account. Accordingly, the Company does not retain its records to provide the information as requested. Prior to the retirement of the Mitchell Unit 2 Cooling Tower, the Company will undertake the time-intensive analysis to calculate the appropriate estimated NBV for the current Mitchell Unit 2 tower to retire.

Please see KPCO_R_KPSC_3_4_Attachment1 for the major capital project spend related to the Mitchell Unit 2 Cooling Tower since Kentucky Power assumed its 50% ownership share.

Please see KPCO_R_KPSC_3_4_Attachment2 for the approved depreciation rates for the Mitchell Plant when it was acquired by the Company, KPCO_R_KPSC_3_4_Attachment3 for the approved depreciation rates from Case No. 2014-00396, KPCO_R_KPSC_3_4_Attachment4 for the approved depreciation rates from Case No. 2017-00179, and KPCO_R_KPSC_3_4_Attachment5 for the approved depreciation rates from Case No. 2025-00257.

Witness: Lerah M. Kahn

Witness Joshua D. Snodgrass

KPSC Case No. 2014-00396
Commission Staff's 2nd Set of Data Requests
Dated January 29, 2015
Item No. 27
Attachment 3
Page 1 of 1

Ohio Power Company			
Mitchell Plant - Depreciation Rates			
Account	2007 Depreciation Study - Mitchell Plant	1993 Depreciation Study - Commission Staff Rates	Difference
311	2.87%	2.77%	0.10%
312	3.90%	3.52%	0.38%
314	2.86%	3.35%	-0.49%
315	2.39%	3.16%	-0.77%
316	2.79%	3.36%	-0.57%
Note that the 1993 Commission Staff depreciation rates were for all of the Company's Steam Production Plant including Mitchell Plant.			

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KPSC 3_5 Refer to the previous rate cases, Case Nos. 2020-00174 and 2023-00159. Refer also to the Direct Testimony of Daniel W. Pizzino (Pizzino Direct Testimony), page 5, line 7, stating that Kentucky Power's plant personnel first observed the structural anomalies in April 2016. Explain whether Kentucky Power disclosed or discussed the condition of Mitchell Plant Cooling Tower 2 during those rate case proceedings.

RESPONSE

The Company did not discuss the condition of the Mitchell Unit 2 Cooling Tower during rate cases 2020-00174 or 2023-00159. The Company was not seeking to include any capital expenditures relating to the repair of the Mitchell Unit 2 Cooling Tower in base rates in those cases, and the Company does not provide general updates on the status of individual components in base rate cases. The full extent of the condition of the Unit 2 Cooling Tower was not known until implementation of the Initial Repair Project began.

Witness: Amy J. Elliott

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DATA REQUEST

KPSC 3_6 Refer to Staff's First Request, Item 15, which states that the height of the existing Mitchell Unit 2 cooling tower after partial demolition would be approximately 256 feet. Provide a table showing the impact of various reductions in the height of Mitchell Plant Cooling Tower 2 on the unit's thermal capacity, compared to its current thermal capacity. For each assumed height reduction scenario, identify the corresponding reduction in thermal capacity and explain the effect, if any, on the remaining useful life of the cooling tower and the Mitchell Plant.

RESPONSE

The impacts on the thermal capacity of the Unit 2 Cooling Tower at various tower height reductions are shown in the table below. Regardless of the reduction in tower height, reinforcements and modifications to the tower shell will still be required. As a result, variations in tower height are not expected to affect the remaining useful life.

Case	Shell Config	CW Temp (°F)	Delta CWT (°F)	MW	Delta MW
1	Original Height	94	0	790	0
2	-50 ft	96	+2	786	-4
3	-100 ft	98	+4	782	-8
4	-150 ft	101	+7	776	-14

Witness: Daniel W. Pizzino

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KPSC 3_7 Refer the Direct Testimony of Shawn P. Malone (Malone Direct Testimony, page MALONE – 5, table SPM-1 – Summary of Options).

- a. Explain the short outage mention for Option 3 and length of it.
- b. Provide the cost of purchasing capacity for Option 3 and Option 4 (Monthly, Quarterly, Half-year and annually) and compare them to the cost of PJM's penalty for not having the required capacity.

RESPONSE

a. Please see the Company's response to Staff 2-4 and Sierra Club 1-25 subpart d. The Company estimates that the tie-in outage for Option 3 would require Mitchell Unit 2 to be offline for approximately 8-10 weeks and that the tie-in outage would occur during an otherwise scheduled and PJM-approved outage.

b. Option 3 does not require the need to purchase additional capacity because the tie-in outage will occur during an otherwise scheduled and PJM-approved outage.

The cost of purchasing capacity for Option 4 was provided in the supporting workpapers, with the most recent being included in KPCO_R_SC_2_11_ConfidentialAttachment3 on the "Cash Flow of U2" tab starting in Row 9. Capacity is an annual product and cannot be purchased by month, quarter, or half year.

For the 2027/2028 PJM planning year, the PJM deficiency rate is calculated as the greater of cost of new entry ("CONE") or $1.75 * \text{Net CONE}$. This deficiency rate is then multiplied by the number of days short and the number of MWs short to calculate the total penalty amount. However, the deficiency rate is currently capped at the FERC approved ceiling of \$333.44/MW-day for the 2027/2028 PJM planning year. This leads to a lower penalty payment than what would normally be required. Please see KPCO_R_KPSC_3_7_Attachment1 for the calculation.

Importantly, the Company does not plan for non-compliance with applicable requirements as a viable option for how to proceed.

Witness: Shawn P. Malone (a)

Witness: Nicole M. Coon (b)

VERIFICATION

The undersigned, Nicole M. Coon, being duly sworn, deposes and says she is 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

_____)
_____) 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 June 29, 2026.

[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. 147.08 R.C.

VERIFICATION

The undersigned, Amy J. Elliott, being duly sworn, deposes and says she is the Vice President of Regulatory and External Affairs for Kentucky Power, 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.

Amy J. Elliott

Amy J. Elliott

Commonwealth of Kentucky)

)

Case No. 2026-00001

County of Boyd)

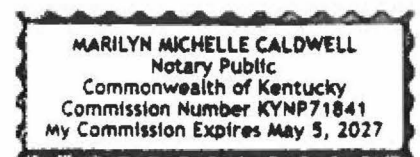
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Subscribed and sworn to before me, a Notary Public in and before said County
and State, by Amy J. Elliott, on June 26, 2026.

Marilyn Michelle Caldwell
Notary Public

My Commission Expires May 5, 2027

Notary ID Number KYNP71841



VERIFICATION

The undersigned, Lerah M. Kahn, being duly sworn, deposes and says she is the Manager of Regulatory Services for Kentucky Power, 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.


Lerah M. Kahn

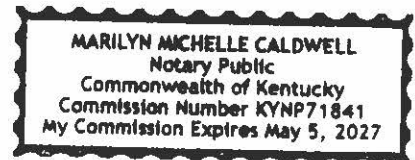
Commonwealth of Kentucky)
)
County of Boyd) Case No. 2026-00001

Subscribed and sworn to before me, a Notary Public in and before said County and State, by Lerah M. Kahn, on June 26, 2026.


Notary Public

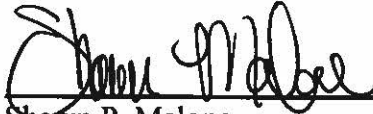
My Commission Expires May 5, 2027

Notary ID Number KYNP71841



VERIFICATION

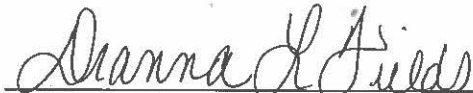
The undersigned, Shawn P. Malone, being duly sworn, deposes and says he is the Director of Projects for American Electric Power Service Corporation, that he has personal knowledge of the matters set forth in the foregoing responses and the information contained therein is true and correct to the best of his information, knowledge, and belief.


Shawn P. Malone

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 June 24, 2026.


Notary Public

My Commission Expires December 17, 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.


Daniel W. Pizzino

State of Ohio)
County Fentlin)

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 6/26/2025.


Notary Public

My Commission Expires Never

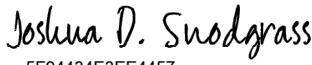
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Paul D. Flory
Attorney At Law
Notary Public, State of Ohio
My commission has no expiration date
Sec. 147.03 R.C.

VERIFICATION

The undersigned, Joshua D. Snodgrass, being duly sworn, deposes and says he is the Mitchell Plant Manager, 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.

Signed by:

5F94434E3EE4457...

Joshua D. Snodgrass

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 Joshua D. Snodgrass, on 6/29/2026 | 1:30 PM EDT.

Signed by:

E9B1BC7AC31F421...

Notary Public

MARILYN MICHELLE CALDWELL ONLINE NOTARY PUBLIC COMMONWEALTH OF KENTUCKY Commission #KYNP71841 My Commission Expires 5/5/2027
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My Commission Expires May 5, 2027

Notary ID Number KYNP71841