

Kentucky Power Company
KPSC Case No. 2026-00001
Commission Staff's First Set of Post Hearing Data Requests
Dated July 14, 2026
Page 1 of 2

DATA REQUEST

KPSC Refer to the July 8, 2026 Hearing Video Transcript (HVT) at 11:14:15
PHDR 1_10 AM through 11:18:50 AM. Refer also to Kentucky Power's April 10, 2026 response to Commission Staff's First Request for Information (Staff's First Request), Item 5(b), KPCO_R_KPSC_1_5_ConfidentialAttachment3.

- a. Provide copies of the estimates for the approximately \$3 million full demolition cost included in Option 1, the approximately \$29 million partial demolition cost included in Option 3 and Option 4, and the approximately \$5 million full demolition.
- b. Provide any correspondence with vendors regarding those estimated demolition costs.
- c. If Kentucky Power contends that the estimates or correspondence were already provided as part of KPCO_R_KPSC_1_5_ConfidentialAttachment3, identify where each estimate and the relevant correspondence are included.
- d. Explain the difference between the \$3 million and \$5 million full demolition costs.

RESPONSE

The Company is diligently working on completing its response to this request and has filed a Motion for Extension of Time to file its response by no later than July 30, 2026.

July 30, 2026 Supplemental Response

- a. The estimated cost to fully demolish the Unit 2 Cooling Tower included in Option 1 was developed from historical industry estimates and discussions with another utility that recently fully demolished a hyperbolic cooling tower. The cost estimates for a partial demolition of the Unit 2 Cooling Tower included in Options 3 and 4 were based on an estimate from a contractor. Please see KPCO_R_KPSC_PHDR 1_10 ConfidentialAttachment1 for the contractor estimate. Each of Options 1, 3, and 4 include an additional approximately \$7M in internal labor costs, owner's costs, indirect costs and costs associated with interest on AFUDC.

Kentucky Power Company
KPSC Case No. 2026-00001
Commission Staff's First Set of Post Hearing Data Requests
Dated July 14, 2026
Page 1 of 2

b. The estimate provided in KPCO_R_KPSC_PHDR 1_10 ConfidentialAttachment1 was transmitted to the Company via email without additional correspondence. The high-level budgetary estimate for the cost of fully demolishing the Unit 2 Cooling Tower was provided via a telephone call. The Mitchell site has unique constraints (*e.g.*, other unit still online, infrastructure in close proximity that is still in use, tight area) that added additional costs.

c. Partial and full demolition costs were not provided in KPCO_R_KPSC_1_5_ConfidentialAttachment3.

d. The difference between the \$3 million and \$5 million estimates for full demolition derives from when the demolition would occur. Because the full demolition of the Unit 2 Cooling Tower in Options 1, 3, and 4 would not occur for approximately 15 years, the Company added a cost escalation.

Witness: Shawn P. Malone

KPCO_R_KPSC_PHDR_1_10_ConfidentialAttachment1 is redacted in its entirety.

Kentucky Power Company
KPSC Case No. 2026-00001
Commission Staff's First Set of Post Hearing Data Requests
Dated July 14, 2026

DATA REQUEST

KPSC Refer to the July 8, 2026 HVT at 11:24:30 AM through 11:26:31 AM.
PHDR 1_11

- a. Provide a copy of the bid or estimate solicitation for the initial project to repair the existing cooling tower discussed in the referenced testimony, any bids or estimates provided in response to that solicitation regardless of form, and any contracts that arose from that solicitation.
- b. Identify the response from the contractor that did not meet specifications and explain why.

RESPONSE

The Company is diligently working on completing its response to this request and has filed a Motion for Extension of Time to file its response by no later than July 30, 2026.

July 30, 2026 Supplemental Response

a. Please see KPCO_R_KPSC_PHDR_1_11_ConfidentialAttachment1 and KPCO_R_KPSC_PHDR_1_11_ConfidentialAttachment2. Please also see KPCO_R_KPSC_PHDR_1_11_ConfidentialAttachment3 for the Company's RFP. The RFP was issued to six approved contractors. Two contractors submitted proposals, ICC Commonwealth Corporation (ICC) and Brand Safway Industries, LLC (Platinum Concrete & Masonry Restoration). Vector Construction, NAES Power Contractors, Inc., Mascaro Construction Company, LP and Kokosing Industrial elected not to provide proposals.

b. Brand Safway is the contractor that did not meet specifications due to lack of response after submitting their initial proposal. The Company's correspondence with Brand Safway is provided as KPCO_R_KPSC_PHDR_1_11_Attachment4 and shows the Company never received the requested information.

Witness: Shawn P. Malone

KPCO_R_KPSC_PHDR_1_11_ConfidentialAttachment1 is redacted in its entirety.

KPCO_R_KPSC_PHDR_1_11_ConfidentialAttachment2 is redacted in its entirety.

KPCO_R_KPSC_PHDR_1_11_ConfidentialAttachment3 is redacted in its entirety.



Subject AEP - Plant Mitchell
 MITCHELL U2 Cooling Tower Shell Repair Project
 Specification ML-LC-06132023

The requested information will be provided at a later date upon finalization of scope

Kentucky Power Company
KPSC Case No. 2026-00001
Commission Staff's First Set of Post Hearing Data Requests
Dated July 14, 2026
Page 1 of 2

DATA REQUEST

KPSC Refer to the July 8, 2026 HVT at 11:27:35 AM through 11:29:35 AM.

PHDR 1_12

- a. Provide any correspondence, memorandums or other documents that discuss the cost risks of Option 1 (completing the tower repairs) or the extent to which the original estimates should be escalated to estimate the costs going forward.
- b. Explain the percentage that was used to escalate the cost of Option 1, and explain why and how that percentage and the resulting final cost was chosen and why.
- c. Provide any correspondence with International Chimney Corporation regarding the estimated costs of Option 1.
- d. If Kentucky Power contends that the correspondence were already provided as part of KPCO_R_KPSC_1_5_ConfidentialAttachment3, identify where the relevant correspondence are included.

RESPONSE

The Company is diligently working on completing its response to this request and has filed a Motion for Extension of Time to file its response by no later than July 30, 2026.

July 30, 2026 Supplemental Response

a. and b. The price risk associated with the repair work in Option 1 (and in Option 4) was derived from the Company's experience in the Initial Repair Project. As described in Company Witnesses Pizzino and Malone's Direct Testimonies, conditions discovered on the tower during the Initial Repair Project led to additional costs and time required to complete the Initial Repair Project. Because the Initial Repair Project focused on the lower portions of the Unit 2 Cooling Tower, where the project was expected to present less challenges, the Company prudently ceased repair work and evaluated options. The unexpected costs associated with the Initial Repair Project and uncertainties regarding the conditions of the rest of the Unit 2 Cooling Tower create the price risk. The Company does not have any memoranda or other documentation regarding the calculation of the price risk.

Kentucky Power Company
KPSC Case No. 2026-00001
Commission Staff's First Set of Post Hearing Data Requests
Dated July 14, 2026
Page 2 of 2

There was no singular percentage to escalate the tower repair costs in Option 1 (or in Option 4). The Company evaluated the historical spend on the Initial Repair Project and the progress made in conjunction with estimated costs provided by ICC. The Company was then able to produce an estimate. The Company also added a contingency. This contingency was to recognize a combination of schedule impacts, material issues, and seasonal working conditions slowing down work production. Please see KPCO_R_KPSC_PHDR_1_12_ConfidentialAttachment1 for the forecasted yearly costs for Option 1 by category for early cash flows and cost categories for capital, O&M, removal, overheads, AFUDC, contingency, and total approved project cost.

c. Please see KPCO_R_KPSC_PHDR_1_12_ConfidentialAttachment2 for the cost estimate information from ICC. This cost estimate is a part of the total costs described in KPCO_R_KPSC_PHDR_1_12_ConfidentialAttachment1.

d. Correspondence from ICC was not provided in KPCO_R_KPSC_1_5_ConfidentialAttachment3.

Witness: Shawn P. Malone

KPCO_R_KPSC_PHDR_1_12_ConfidentialAttachment1 is redacted in its entirety.

KPCO_R_KPSC_PHDR_1_12_ConfidentialAttachment2 is redacted in its entirety.

Kentucky Power Company
KPSC Case No. 2026-00001
Commission Staff's First Set of Post Hearing Data Requests
Dated July 14, 2026

DATA REQUEST

KPSC Refer to the July 8, 2026 HVT at 11:35:00 AM through 11:37:00 AM.
PHDR 1_13 Refer also to the July 8, 2026 HVT at 11:38:15 AM through 11:40:00 AM.

- a. Provide any bids or memorandums from International Chimney Corporation relating to the estimates or scopes of work for Option 1 and Option 4 provided after it was determined that the cost or scope of the initial project would be more than anticipated.
- b. Provide any estimate, bid, or memorandum from International Chimney Corporation that projects the period in which Unit 2 would have to be offline for Option 4, and identify those portions of the documents provided that include that projection.

RESPONSE

The Company is diligently working on completing its response to this request and has filed a Motion for Extension of Time to file its response by no later than July 30, 2026.

July 30, 2026 Supplemental Response

- a. Please see KPCO_R_KPSC_PHDR_1_10_ConfidentialAttachment1 for International Chimney Corporation's proposal for their portion of the costs to repair the Unit 2 Cooling Tower. The ICC work is only a portion of the costs associated with Options 1 and 4. The full cost estimates are provided in KPCO_R_KPSC_PHDR_1_12_ConfidentialAttachment1.
- b. A discussion of the length of the outage required to complete work on Option 4 is located on the bottom of page 1 of KPCO_R_KPSC_PHDR_1_10_ConfidentialAttachment1.

Witness: Shawn P. Malone

Kentucky Power Company
KPSC Case No. 2026-00001
Commission Staff's First Set of Post Hearing Data Requests
Dated July 14, 2026
Page 1 of 2

DATA REQUEST

KPSC Refer to Malone Direct Testimony, Confidential Exhibit SPM-1,
PHDR 1_15 Appendix B. Refer also to Kentucky Power's April 10, 2026 response to Staff's First Request, Item 5(b),
KPCO_R_KPSC_1_5_ConfidentialAttachment3 at page 448.

- a. Explain each change between the estimate included in Appendix B to Confidential Exhibit SPM-1 and Confidential Attachment 3 at page 448 that resulted in any differences to the relevant estimates;
- b. Explain why each of those changes were made and who initiated the changes e.g. Worley, Kentucky Power, etc.; and
- c. Provide any correspondence discussing changes to the estimate from when Confidential Attachment 3 at page 448 was first provided to Kentucky Power or an affiliate to when Appendix B was first provided to Kentucky Power or an affiliate.

RESPONSE

The Company is diligently working on completing its response to this request and has filed a Motion for Extension of Time to file its response by no later than July 30, 2026.

July 30, 2026 Supplemental Response

- a. Changes occurred as scope developed and received estimates from vendors and worked through conceptual design. The estimate is an iterative process where the numbers get refined or clarified as more detailed information becomes available and finalized.
- b. This is the Company and AEPSC's standard approach in developing large, capital-intensive projects. The estimate and scope definition progress through the project lifecycle. The Company and AEPSC made changes for this project as its scope became more defined and detailed information was developed through discussions with multiple potential project vendors. Worley helped support AEPSC by gathering information for the estimates. AEPSC, working on behalf of Kentucky Power, reviewed and approved the changes as more information became readily available.

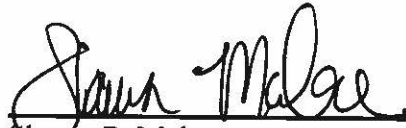
Kentucky Power Company
KPSC Case No. 2026-00001
Commission Staff's First Set of Post Hearing Data Requests
Dated July 14, 2026
Page 2 of 2

c. Changes to the estimate were the subject of discussions and workshops between AEPSC, working on behalf of Kentucky Power, and Worley. There were no documents responsive to this request that have not already been provided.

Witness: Shawn P. Malone

VERIFICATION

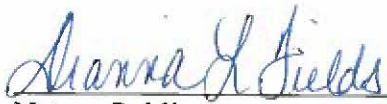
The undersigned, Shawn P. Malone, being duly sworn, deposes and says he is the Director of Projects for American Electric Power Service Corporation, that he has personal knowledge of the matters set forth in the foregoing responses and the information contained therein is true and correct to the best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


Shawn P. Malone

State of Ohio
County Franklin

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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 July 30, 2026.


Notary Public



My Commission Expires December 30, 2030

Notary ID Number 2025-RE-897557