

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF KENTUCKY	)	
POWER COMPANY FOR APPROVAL OF (1) A	)	
CERTIFICATE OF PUBLIC CONVENIENCE AND	)	
NECESSITY TO MAKE THE CAPITAL	)	
INVESTMENTS NECESSARY TO CONTINUE	)	
TAKING CAPACITY AND ENERGY FROM THE	)	CASE NO.
MITCHELL GENERATING STATION AFTER	)	2025-00175
DECEMBER 31, 2028, (2) AN AMENDED	)	
ENVIRONMENTAL COMPLIANCE PLAN, (3)	)	
REVISED ENVIRONMENTAL SURCHARGE	)	
TARIFF SHEETS, AND (4) ALL OTHER	)	
REQUIRED APPROVALS AND RELIEF	)	

COMMISSION STAFF'S POST-HEARING REQUEST FOR INFORMATION
TO KENTUCKY POWER COMPANY

Kentucky Power Company (Kentucky Power), pursuant to 807 KAR 5:001, shall file with the Commission an electronic version of the following information. The information requested is due on December 5, 2025. The Commission directs Kentucky Power to the Commission's July 22, 2021 Order in Case No. 2020-00085¹ regarding filings with the Commission. Electronic documents shall be in portable document format (PDF), shall be searchable, and shall be appropriately bookmarked.

Each response shall include the question to which the response is made and shall include the name of the witness responsible for responding to the questions related to the

¹ Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID-19* (Ky. PSC July 22, 2021), Order (in which the Commission ordered that for case filings made on and after March 16, 2020, filers are NOT required to file the original physical copies of the filings required by 807 KAR 5:001, Section 8).

information provided. Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association or a governmental agency, be accompanied by a signed certification of the preparer or the person supervising the preparation of the response on behalf of the entity that the response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

Kentucky Power shall make timely amendment to any prior response if Kentucky Power obtains information that indicates the response was incorrect or incomplete when made or, though correct or complete when made, is now incorrect or incomplete in any material respect.

For any request to which Kentucky Power fails or refuses to furnish all or part of the requested information, Kentucky Power shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention shall be given to copied and scanned material to ensure that it is legible. When the requested information has been previously provided in this proceeding in the requested format, reference may be made to the specific location of that information in responding to this request. When applicable, the requested information shall be separately provided for total company operations and jurisdictional operations. When filing a paper containing personal information, Kentucky Power shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

1. Refer to Direct Testimony of Tanner S. Wolfram (Wolfram Direct Testimony), page 22, line 5 through line 6. Provide a copy of any minutes from the May 28, 2025 meeting of the Mitchell Operating Committee.

2. Refer to Wolfram Direct Testimony, Exhibit TSW-1.

a. Explain each basis for the premise that Exhibit TSW-1 or any other agreement involving Kentucky Power would require Kentucky Power to give-up its 50 percent share of the Mitchell Plant, or its right to 50 percent of the energy or capacity from the Mitchell Plant, due to Kentucky Power's failure to pay 50 percent of the capital costs for a given project. Identify in your response the provisions of agreements that support that premise and explain why those provisions support that premise.

b. If the Commission were to approve Kentucky Power's request herein, explain whether it is Kentucky Power's position that the Commission would be required to approve recovery of any capital project approved by the Mitchell Plant Operating Committee and the West Virginia Commission in order for Kentucky Power to retain its 50 percent share of the Mitchell Plant, or its right to 50 percent of the energy or capacity from the Mitchell Plant, and explain each basis for your response.

c. Explain whether your response to subpart b. would differ in a circumstance in which the Mitchell Plant Operating Committee and the West Virginia Commission approved a future project with a higher capital cost but which had a longer life whereas the Kentucky Commission found that a project with a lower capital cost and a shorter life would be least-cost.

d. Confirm that Exhibit TSW-1 and other agreements related to Mitchell Plant allow the Commission to review the prudence of operation and maintenance (O&M)

expenses at Mitchell Plant and to make adjustments to the extent such adjustments are supported by the evidence, and explain each basis for your response.

e. Explain whether changes made to Exhibit TSW-1 and other agreements related to Mitchell Plant that allowed Wheeling Power Company (Wheeling Power) to take over direct operation of the Mitchell Plant from Kentucky Power affect the Commission's ability to conduct prudency reviews of O&M expenses at Mitchell Plant and to make adjustments to the extent such adjustments are supported by the evidence.

2. Refer to Wolfram Direct Testimony, page 24, Figure TSW-4.

a. State whether the full \$20,059,165.36 reflected in Figure TSW-4 as Kentucky Power's cost of service through December 2025 will be recovered from Wheeling Power's customers, and explain each basis for your response.

b. If the Commission were to grant a regulatory asset to be recovered in Kentucky Power's rates for the full \$20,059,165.36 reflected in Figure TSW-4, explain how the full \$20,059,165.36 will be reimbursed to Wheeling Power's customers through the creation and amortization of a regulatory liability, with or without carrying costs. If any portion of the \$20,059,165.36 will not be reimbursed to Wheeling Power's customers, identify those portions that will not be reimbursed and explain why they will not be reimbursed e.g. they were not paid by Wheeling Power customers.

3. Refer to the Direct Testimony of Joshua D. Snodgrass, page 8, Figure JDS-3, indicating estimated additional future spending for Cooling Tower Reinforcement of \$15,852,410 from April 2025 to December 2025.

a. Identify what portions of that amount have not been spent to date.

b. Identify any other material changes to the amounts reflected in Figure JDS-3, if any, not including the potential projects discussed in the Supplemental Direct Testimony of Alex E. Vaughn.

4. Refer to the final Order in Case No. 2020-00290² in which the Commission noted that it will not issue a certificate of public convenience and necessity (CPCN) for construction that has been completed prior to the filing of an application for the CPCN, but in which the Commission authorized the inclusion of the plant in service associated with such construction in the revenue requirement calculation. Explain whether a decision that denied the CPCN requested in this matter based on that procedural issue but otherwise determined that the costs at issue were recoverable would affect Kentucky Power's ability to retain its 50 percent share of the capacity and energy from Mitchell Plant.

5. Refer to the November 18, 2025 Hearing Video Transcript (H.V.T.) at 10:13:15-10:15:00. Provide a copy of Kentucky Power's application, once filed or submitted to the federal government, for grant funds from the amounts recently announced by the Department of Energy for coal plants.

6. Refer to the November 18, 2025 H.V.T. at 11:39:05 discussing the completion of an annual 10 year capital budget for Mitchell Plant. Provide a copy of the most recent capital budget prepared for the Mitchell Plant.

7. Refer to the November 18, 2025 H.V.T. at 11:32:05.

² Case No. 2020-00290, *Electronic Application of Bluegrass Water Utility Operating Company, LLC for an Adjustment of the Rates and Approval of Construction* (Ky. PSC Aug. 2, 2021), Order at 28, citing Case No. 2003-00495, *Application of Classic Construction, Inc. for Approval of Transfer of Ownership of Collbrook Sewage Treatment Plant in Franklin County, Kentucky from Aquasource Utility, Inc.*, (Ky. PSC May 10, 2004) Order.

a. Explain the frequency of monitoring recommended by engineers for the cooling tower at Mitchell Unit 2.

b. Explain the criteria, if any, that engineers are looking for in the inspections and what circumstances, if any, would necessitate an immediate or emergency repair to keep Mitchell Unit 2 operational.

8. Refer to the November 18, 2025 H.V.T. at 02:54:05-02:55:18.

a. Provide copies of Section 3 and Section 5 of the *2025 Quarterly State of the Market Report for PJM: January through September* and Section 3 and Section 5 of the *2021 State of the Market Report for PJM*.

b. Confirm that the reports provided in response to part a. are the reports that were referenced in the hearing testimony referred. If those are not the reports that were referred to in the hearing testimony, or if different sections of the reports were being referred to, provide such reports or sections.

9. Refer to Kentucky Power's response to Commission Staff's First Request for Information (Staff's First Request), Item 16. Refer also to Kentucky Power's response to the Attorney General's First Request for Information (Attorney General's First Request), Item 1, KPCO_R_AG_1_1_ConfidentialAttachment1.

a. Identify the specific request for proposal (RFP) responses that were used to calculate the amounts reflected in the PPAs tab of KPCO_R_AG_1_1_ConfidentialAttachment1.

b. Identify the specific files and page numbers provided in response to Kentucky Power's response to Staff's First Request, Item 16 that include the pricing information used to calculate the amounts in the PPAs tab of

KPCO_R_AG_1_1_ConfidentialAttachment1. Include in the response an explanation of how the pricing information was used to get to the amounts reflected in that spreadsheet.

c. Identify and explain any changes to the PPA prices between the date of the initial responses and any update in or after 2024 for the PPAs used to calculate the amounts in the PPAs tab of KPCO_R_AG_1_1_ConfidentialAttachment1.

10. Refer to Kentucky Power's response to Attorney General's First Request, Item 1, KPCO_R_AG_1_1_ConfidentialAttachment1, Tab Market.

a. Provide a monthly breakdown of the Generation, Revenue, and Total Generation Cost information provided in lines 1 through 13, columns A through J of the Market tab of KPCO_R_AG_1_1_ConfidentialAttachment1.

b. For each month from January 2023 to the most recent month for which information is available, provide a monthly breakdown of the energy produced by Mitchell Unit 1 and Mitchell Unit 2, the revenue from sales of energy from each unit, and the variable cost of producing energy for each unit, with the variable costs broken out between fuel costs and other variable O&M.

11. Refer to Kentucky Power's response to Commission Staff's Fourth Request for Information (Staff's Fourth Request), Item 2(g). Refer to Kentucky Power's response to Attorney General's First Request, Item 1, KPCO_R_AG_1_1_ConfidentialAttachment1, Tabs PPAs and Market.

a. Provide a breakdown of the annual energy production, revenue, and variable costs produced by the production cost run(s) used to calculate the "Energy Margins" for each of the PPAs provided on the PPAs tab of KPCO_R_AG_1_1_ConfidentialAttachment1.

b. Provide the workpapers tying the revenue and variable costs produced by the production cost run(s) to the “Energy Margins” reflected in the PPAs tab of KPCO_R_AG_1_1_ConfidentialAttachment1.

12. Refer to Kentucky Power’s response to Staff’s Fourth Request, Item 1, KPCO_R_KPSC_4_1_Attachment1. Refer also to Kentucky Power’s response to Attorney General’s First Request, Item 1, KPCO_R_AG_1_1_Attachment2. Using the same weighted average cost of capital as that used in KPCO_R_AG_1_1_Attachment2, provide the annual revenue requirement effect for Kentucky Power in 2026 through 2028 associated with the non-ELG capital projects at Mitchell Plant that have previously been asymmetrically allocated between Kentucky Power and Wheeling Power. Include in the response the workpapers reflecting the calculation of those amounts in each year in Excel spreadsheet format with all formulas, columns, and rows unprotected and fully accessible.

13. Refer to Kentucky Power’s response to Staff’s Fourth Request, Item 3, KPCO_R_KPSC_4_3_ConfidentialAttachment4. Provide an updated version of KPCO_R_KPSC_4_3_ConfidentialAttachment4 that reflects the removal of the 40 percent capacity factor limitation, including with respect to the “MWh of Generation.”

14. Provide the clearing price for the PJM Base Residual Auction in each year from 2020 to the most recent year available.

 

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DATED NOV 21 2025

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