

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

AN ELECTRONIC EXAMINATION OF THE)	
APPLICATION OF THE FUEL ADJUSTMENT)	CASE NO.
CLAUSE OF KENTUCKY POWER COMPANY)	2025-00338
FROM NOVEMBER 1, 2022 THROUGH)	
OCTOBER 31, 2024.)	

COMMISSION STAFF'S SECOND 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 February 20, 2026. 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 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

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).

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 the Direct Testimony of Lerah M. Kahn (Kahn Direct Testimony), page 7, Table LMK-2, and Kentucky Power's response to Commission Staff's First Request for Information (Staff's First Request), Item 33.

a. Provide the individual load forecast, including supporting assumptions, broken out by customer class including Residential, Commercial, Industrial, Other Retail, and FERC Municipals forming the basis for the projected kWh sales.

b. Provide Kentucky Power's most recent 15-year forecast for number of customers using the same breakout as requested in part a. above.

2. Refer to the Direct Testimony of Clinton M. Stutler (Stutler Direct Testimony), page 14, line 23, and page 15, lines 1-6. Describe whether the explanation of Kentucky Power's energy hedging program means that Kentucky Power secures forward contracts up to 36 months in advance.

3. Refer to the Stutler Direct Testimony, page 17.

a. Confirm that according to Kentucky Power's maintenance schedule, for the Big Sandy plant's planned outages, no forward gas contracts are or were purchased. If not confirmed, explain how the planned maintenance schedule is accommodated with the forward purchases.

b. Provide a table showing Kentucky Power's daily Operating Balancing Account (OBA) over the review period and when Kentucky Power was required to sell or purchase natural gas to keep its OBA within Columbia Gas Transmission limits.

4. Refer to the Direct Testimony of Jason M. Stegall (Stegall Direct Testimony), page 4, lines 15-22. If the Big Sandy or Mitchell units are in Reserve Shutdown, explain the notice time PJM Interconnection, LLC (PJM) provides if the units need to be online.

5. Refer to the Stegall Direct Testimony, page 12, lines 17-18. Explain why Kentucky Power would pay for coal it could not receive.

6. Refer to the Stegall Direct Testimony, page 16. Explain whether the generation unit status of Kentucky Power's regulated affiliates affects the decision to

place one of Kentucky Power's units into Reserve Shutdown or affects the timing and duration of the shutdown.

7. Refer to Kentucky Power's response to Staff's First Request, Item 3.

a. Explain why Kentucky Power allowed its coal inventory levels to grow to significant levels above target.

b. Explain the actions, if any, that Kentucky Power took to manage its receipt of coal and the coal inventory levels. Include in the response the current estimated high sulfur and low sulfur inventory levels.

c. Explain why it is a prudent strategy for Kentucky Power to commit significant amounts of capital in coal inventory that cannot be recovered until the coal is consumed.

d. Provide the estimated value of the low sulfur coal contained in inventory represented by the difference between the target level and 97 days above target.

8. Refer to Kentucky Power's response to Staff's First Request, Item 5. Explain whether the contract purchases listed in Attachment 1 were forward purchases.

9. Refer to Kentucky Power's response to Staff's First Request, Item 8.

a. Provide the number of years Kentucky Power uses to weather normalize its data.

b. Explain whether Kentucky Power has conducted a study varying the number of years used in its weather normalization calculations to capture increasing weather variability. If so, provide the results of that study.

10. Refer to Kentucky Power's response to Staff's First Request, Item 12.

a. Explain whether Kentucky Power bid on or worked to renegotiate the wholesale power contracts with Olive Hill and the city of Vanceburg.

b. Explain whether Kentucky Power knows the entity supplying power to the two customers.

11. Refer to Kentucky Power's response to Staff's First Request, Item 14. In KPCO_R_KPSC_1_14_Attachment1, provide an explanation of why the unit was placed into Reserve Shutdown. Include in the response the communications with PJM requesting the unit be placed into Reserve Shutdown status.



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DATED **FEB 06 2026**

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