

From: [PSC Public Comment](#)
To: [REDACTED]
Subject: RE: Public Comment Regarding Inspection and Maintenance History of the Mitchell Plant Unit 2 Cooling Tower
Date: Friday, July 31, 2026 9:02:00 AM

Case No. 2026-00001

Thank you for your comments on the application of Kentucky Power Company. Your comments in the above-referenced matter have been received and will be placed into the case file for the Commission's consideration. Please cite the case number in this matter, 2026-00001 in any further correspondence. The documents in this case are available at [View Case Filings for: 2026-00001 \(ky.gov\)](#).

Thank you for your interest in this matter.

From: Zachary Tackett [REDACTED]
Sent: Thursday, July 30, 2026 11:05 AM
To: PSC Executive Director <PSCED@ky.gov>
Subject: Public Comment Regarding Inspection and Maintenance History of the Mitchell Plant Unit 2 Cooling Tower

This Message Originated from Outside the Organization

This Message Is From an External Sender.

[Report Suspicious](#)



Case No. [2026-00001](#)

Dear Commissioners,

I respectfully submit the following public comment regarding Kentucky Power Company's responses to the Commission Staff's First Set of Post-Hearing Data Requests.

Kentucky Power's responses raise significant questions regarding the inspection and maintenance history of the Unit 2 cooling tower shell that I believe warrant additional scrutiny before the Commission reaches a final decision.

In response to PHDR 1-5, the Company states that, based on its review of available records, **there are no documented maintenance activities performed on, or maintenance needs identified for, the Unit 2 cooling tower shell prior to the discovery of structural anomalies in 2016.**

In response to PHDR 1-6, the Company further explains that cooling tower shell inspections were not performed on a fixed schedule but instead were managed through a condition-based, risk-informed approach.

In response to PHDR 1-6, the Company also states that because there was **no condition-based reason to inspect the Unit 2 cooling tower prior to the visual identification of structural anomalies, there are no inspection reports for the Unit 2 cooling tower before those anomalies were discovered.**

Finally, in response to PHDR 1-8, the Company acknowledges that it **cannot definitively explain why Unit 1's cooling tower was inspected in 1990 while Unit 2 apparently was not.**

As a Kentucky ratepayer, I find these responses concerning.

These statements do not necessarily establish that Kentucky Power acted improperly. However, they raise legitimate questions regarding whether the inspection program for an aging concrete cooling tower was sufficient to identify deterioration before it progressed to the point that a major capital replacement became necessary.

Accordingly, I respectfully request that the Commission consider requiring Kentucky Power to address the following questions before any final determination regarding cost recovery:

1. What industry standards or engineering guidance governed inspection intervals for large natural-draft concrete cooling towers during the relevant period?
2. Were similar cooling towers owned or operated by AEP inspected on a different schedule, and if so, why?
3. Why was Unit 1 inspected in 1990 while the Company states it cannot

- determine why Unit 2 was not?
4. What structural due diligence was performed before Kentucky Power acquired its ownership interest in the Mitchell Plant?
 5. Were any historical inspection or maintenance records lost or unavailable due to legacy recordkeeping systems?
 6. Could earlier inspections reasonably have identified deterioration before the structural anomalies observed in 2016?

Given the significant costs that Kentucky ratepayers may ultimately be asked to bear, I respectfully request that the Commission consider obtaining an independent engineering evaluation of the historical inspection and maintenance practices applicable to the Unit 2 cooling tower rather than relying solely upon the Company's retrospective assessment.

Ratepayers deserve confidence that all reasonable maintenance and inspection practices were followed before costs associated with replacement are recovered through customer rates.

Respectfully submitted,

Zachary Tackett

Pike County, Kentucky

Service List for Case 2026-00001

* Angela M Goad
Assistant Attorney General
Office of the Attorney General Office of Rate Intervention
700 Capitol Avenue
Suite 20
Frankfort, KY 40601-8204

* Harlee P. Havens
Stites & Harbison
250 West Main Street, Suite 2300
Lexington, KY 40507

* Jody Kyler Cohn
Boehm, Kurtz & Lowry
425 Walnut Street
Suite 2400
Cincinnati, OH 45202

* Jennifer L. Parrish
Kentucky Power Company
1645 Winchester Avenue
Ashland, KY 41101

* Joe F. Childers
Childers & Baxter PLLC
300 Lexington Building, 201 West Sho
Lexington, KY 40507

* John G Horne, II
Office of the Attorney General Office of Rate Intervention
700 Capitol Avenue
Suite 20
Frankfort, KY 40601-8204

* Kentucky Power Company
1645 Winchester Avenue
Ashland, KY 41101

* Kenneth J Gish, Jr.
Stites & Harbison
250 West Main Street, Suite 2300
Lexington, KY 40507

* Kristin Henry
Staff Attorney
Sierra Club Environmental Law Program
2101 Webster Street
Suite 1300
Oakland, CA 94612

* Lawrence W Cook
Assistant Attorney General
Office of the Attorney General Office of Rate Intervention
700 Capitol Avenue
Suite 20
Frankfort, KY 40601-8204

* Michael West
Office of the Attorney General Office of Rate Intervention
700 Capitol Avenue
Suite 20
Frankfort, KY 40601-8204

* Michael J. Schuler
American Electric Power Service Corporation
1 Riverside Plaza, 29th Floor
Post Office Box 16631
Columbus, OH 43216

* Honorable Michael L Kurtz
Attorney at Law
Boehm, Kurtz & Lowry
425 Walnut Street
Suite 2400
Cincinnati, OH 45202

* Nathaniel Shoaff
Sierra Club
2101
Webster St. , Suite 1300
Oakland, CA 94612

* Toland Lacy
Office of the Attorney General
700 Capital Avenue
Frankfort, KY 40601