

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF KENTUCKY)	
POWER COMPANY FOR 1) A CERTIFICATE OF)	
PUBLIC CONVENIENCE AND NECESSITY TO)	
CONSTRUCT A MECHANICAL DRAFT COOLING)	CASE NO.
TOWER AT THE MITCHELL PLANT 2))	2026-00001
APPROVAL OF CERTAIN REGULATORY AND)	
ACCOUNTING TREATMENTS, AND 3) ALL)	
OTHER REQUIRED APPROVALS AND RELIEF)	

COMMISSION STAFF'S THIRD 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 July 2, 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

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).

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 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.

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.

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.

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.

5. Refer to the previous rate cases, Case Nos. 2020-00174² and 2023-00159.³ 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.

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.

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.

² Case No. 2020-00174, *Electronic Application of Kentucky Power Company for (1) a General Adjustment of Its Rates for Electric Service; (2) Approval of Tariffs and Riders; (3) Approval of Accounting Practices to Establish Regulatory Assets and Liabilities; (4) Approval of a Certificate of Public Convenience and Necessity; and (5) All Other Required Approvals and Relief* (Ky. PSC May 14, 2021), final Order.

³ Case No. 2023-00159, *Electronic Application of Kentucky Power Company for (1) a General Adjustment of Its Rates for Electric Service; (2) Approval of Tariffs and Riders; (3) Approval of Accounting Practices to Establish Regulatory Assets and Liabilities; (4) a Securitization Financing Order; and (5) All Other Required Approvals and Relief* (Ky. PSC Jan. 19, 2024), final Order.

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.



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DATED JUN 22 2026

cc: Parties of Record

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