

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF KENTUCKY POWER COMPANY)	
FOR APPROVAL OF RENEWABLE ENERGY)	
PURCHASE AGREEMENT FOR WIND ENERGY)	CASE NO.
RESOURCES BETWEEN KENTUCKY POWER)	2009-00545
COMPANY AND FPL ILLINOIS WIND, LLC.)	

SUPPLEMENTAL DATA REQUEST OF COMMISSION STAFF
TO KENTUCKY POWER COMPANY

Kentucky Power Company ("Kentucky Power"), pursuant to 807 KAR 5:001, is to file with the Commission the original and 10 copies of the following information, with a copy to all parties of record. The information requested herein is due no later than March 12, 2010. Responses to requests for information shall be appropriately bound, tabbed and indexed. Each response shall include the name of the witness responsible for responding to 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 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 it obtains information which indicates that the response was incorrect when made or, though

correct when made, is now incorrect in any material respect. For any request to which Kentucky Power fails or refuses to furnish all or part of the requested information, it shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention shall be given to copied 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.

1. Refer to Kentucky Power's response to Item 7 of the Kentucky Industrial Utility Customers, Inc.'s ("KIUC") first data request. The first page of the response discusses the likelihood of some mandatory Renewable Portfolio Standard ("RPS") being ultimately required at the federal level. The witness sponsored by KIUC in Case No. 2009-00353¹ has testified (concerning renewable resources) that "[t]here is significant uncertainty as to whether there ever will be a federal or Kentucky legislative mandate to acquire such resources and the Companies do not claim otherwise." (Emphasis added.) Identify and describe any publicly known factors, conditions, pending legislation, etc., if any, of which Kentucky Power is aware, which it believes supports the contention of the KIUC witness that the uncertainty regarding an ultimate federally mandated RPS is "significant."

¹ Case No. 2009-00353, Application of Louisville Gas and Electric Company and Kentucky Utilities Company for Approval of Purchased Power Agreements and Recovery of Associated Costs. Direct Testimony of Lane Kollen at 5 (Feb 10, 2010.)



Jeff Derouen
Executive Director
Public Service Commission
P.O. Box 615
Frankfort, Ky. 40602

DATED FEB 26 2010

cc: Parties of Record

Case No. 2009-00545

Lawrence W Cook
Assistant Attorney General
Office of the Attorney General Utility & Rate
1024 Capital Center Drive
Suite 200
Frankfort, KY 40601-8204

Honorable Michael L Kurtz
Attorney at Law
Boehm, Kurtz & Lowry
36 East Seventh Street
Suite 1510
Cincinnati, OH 45202

Honorable Mark R Overstreet
Attorney at Law
Stites & Harbison
421 West Main Street
P. O. Box 634
Frankfort, KY 40602-0634