

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF KENTUCKY POWER	)	
COMPANY FOR A CERTIFICATE OF PUBLIC	)	
CONVENIENCE AND NECESSITY	)	CASE NO.
AUTHORIZING THE COMPANY TO CONVERT	)	2013-00430
BIG SANDY UNIT 1 TO A NATURAL GAS-FIRED	)	
UNIT AND FOR ALL OTHER REQUIRED	)	
APPROVALS AND RELIEF	)	

COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION  
TO KENTUCKY POWER COMPANY

Kentucky Power Company ("Kentucky Power"), pursuant to 807 KAR 5:001, is to file with the Commission the original and ten copies of the following information, with a copy to all parties of record. The information requested herein is due on or before March 13, 2014. 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 page 7 of the Direct Testimony of Joseph A. Karrasch (“Karrasch Testimony”) where Mr. Karrasch addresses why the Request for Proposal (“RFP”) excluded projects located outside of the PJM footprint. Given that Kentucky Power agreed to a New Source Review Consent Decree in 2007, explain why Kentucky Power did not investigate opportunities outside the PJM footprint prior to the RFP.

2. Refer to Section VI. Risks Associated with Proceeding with a Market Alternative beginning on page 10 of the Karrasch Testimony. Identify and explain the risks inherent to Kentucky Power’s request to refuel Big Sandy Unit 1.

3. Refer to Exhibit SCW-2A showing the Big Sandy Unit 1 Disposition Analysis – CONFIDENTIAL Summary. Column C of the exhibit contains the KPCo Revenue Requirement, net, to the options considered.

a. Explain whether the options under #2B are less risky than the proposal for the Big Sandy Unit 1 Natural Gas conversion.

b. If the answer to 3.a is affirmative, explain why one of the options under #2B was not chosen as the preferable option.



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Executive Director  
Public Service Commission  
P. O. Box 615  
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DATED FEB 27 2014

cc: Parties of Record

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