

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC TARIFF FILING OF KENTUCKY)	
POWER COMPANY FOR APPROVAL OF A)	CASE NO.
SPECIAL CONTRACT WITH EBON)	2022-00387
INTERNATIONAL, LLC)	

COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
TO THE ATTORNEY GENERAL OF THE COMMONWEALTH OF KENTUCKY, BY
AND THROUGH THE OFFICE OF RATE INTERVENTION AND KENTUCKY
INDUSTRIAL UTILITY CUSTOMERS, INC.

The Attorney General of the Commonwealth of Kentucky, by and through the Office of Rate Intervention (Attorney General) and Kentucky Industrial Utility Customers, Inc., (KIUC) (jointly, Attorney General/KIUC), pursuant to 807 KAR 5:001E, are to file with the Commission an electronic version of the following information. The information requested is due on March 8, 2023. The Commission directs Attorney General/KIUC 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

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).

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.

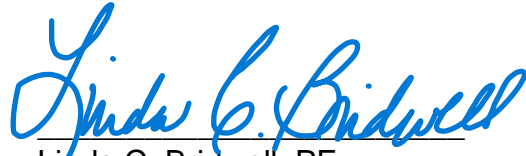
Attorney General/KIUC shall make timely amendment to any prior response if Attorney General/KIUC obtain information that indicates the response was incorrect or incomplete when made or, though correct when made, is now incorrect or incomplete in any material respect. For any request to which Attorney General/KIUC fail or refuse to furnish all or part of the requested information, Attorney General/KIUC shall provide a written explanation of the specific grounds for their 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, Attorney General/KIUC shall, in accordance with 807 KAR 5:001E, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

1. Refer to the Direct Testimony of Stephen J. Baron, page 5, line 13 through page 6, line 16.

a. Explain how demand response capacity reductions, which are separately bid and tested, are included in Kentucky Power Company's (Kentucky Power) capacity requirements for PJM Interconnection LLC. (PJM).

b. Explain why Kentucky Power would need to interrupt a customer's load to benefit from an interruptible election in PJM' capacity model.



Linda C. Bridwell, PE
Executive Director
Public Service Commission
P.O. Box 615
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DATED FEB 22 2023

cc: Parties of Record

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