

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF KENTUCKY)	
POWER COMPANY FOR A CERTIFICATE OF)	
PUBLIC CONVENIENCE AND NECESSITY TO)	CASE NO.
CONSTRUCT 69 KV TRANSMISSION LINES)	2023-00040
AND ASSOCIATED FACILITIES IN PIKE)	
COUNTY, KENTUCKY)	

COMMISSION STAFF'S SECOND 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 August 4, 2023. 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 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

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).

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 2. Explain what is meant by "inferior electrically."

2. Refer to Kentucky Power's response to Staff First Request, Item 2(b). Provide support and documentation for the statement that "[a]fter the components of the alternative solutions described in Case No. 2022-00236 were presented to PJM

Interconnection LLC (PJM) during Regional Transmission Expansion Plan (RTEP) planning process meetings in December 2020 and January 2021, load requirements in the area increased.”

3. Refer to Kentucky Power’s response to Staff’s First Request, Item 2(a). Kentucky Power stated “[b]ecause the alternative solutions in Case No. 2022-00236 were and are insufficient to address the Project’s electrical requirements, they cannot be considered alternatives solutions.” Explain this statement by describing the insufficiencies including, but not limited to, expense, capacity and cost.

4. Refer to Kentucky Power’s response to Staff’s First Request, Item 2(a) and Item 2(b). Kentucky Power stated “[t]he ‘alternative solutions in Case No. 2022-00236, and the associated high-level estimated costs as of 2020, were not presented as part of the application in that case. They were only produced directly in response to Commission Staff’s first set of data requests, Item 28, and were never intended to represent an alternative solution to the Proposed Project because they no longer addressed the requirements in the project area by the time the application in Case No. 2022-00236 was filed.”

a. Confirm that Kentucky Power has not considered any electrically comparable alternatives to the proposed project to address the well-documented need expressed in the applications filed in Case No. 2022-00236 and the present proceeding.

b. Confirm that, had the Commission not inquired as to alternatives in Case No. 2022-00236 and in this case, Kentucky Power would have developed no alternatives.

c. Explain how Kentucky Power determined that the proposed project is the most effective, least cost option to address system deficiencies.

d. Explain why the first set of alternatives referenced in Item 2(b) no longer address the requirements in the project area. Include any updated studies or analysis to support the conclusion.

5. Provide documentation of any load growth in the area since the Commission denied the application in Case No. 2022-00236.

6. Refer to Kentucky Power's response to Staff's First Request, Item 3.

a. Explain why the Belfry substation has not been replaced or repaired, given that the substation is in such condition now that it is not repairable.

b. Provide the cost for repairing and upgrading the Belfry substation in comparison to the plan presented in this case.

7. Refer to Kentucky Power's response to Staff's First Request, Item 9. The response states ". . . the current Application the Company describes, for illustrative purposes, two alternative solutions. . ." Explain how Kentucky Power demonstrates it considered alternative solutions if the alternatives are for illustration only.



Linda C. Bridwell, PE
Executive Director
Public Service Commission
P.O. Box 615
Frankfort, KY 40602

DATED JUL 20 2023

cc: Parties of Record

*David Weiss
Kentucky-American Water Company
2300 Richmond Road
Lexington, KY 40502

*Hector Garcia
Kentucky Power Company
1645 Winchester Avenue
Ashland, KY 41101

*Kentucky Power Company
1645 Winchester Avenue
Ashland, KY 41101

*Katie M Glass
Stites & Harbison
421 West Main Street
P. O. Box 634
Frankfort, KENTUCKY 40602-0634