

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF KENTUCKY)	
POWER COMPANY FOR (1) RENEWED)	
AUTHORITY UNDER KRS 278.2207 (2) AND KRS)	
278.2219 TO ENABLE THE COMPANY TO PAY)	CASE NO.
THE FEES AND COSTS IMPOSED BY THE GRID)	2023-00305
ASSURANCE LLC SUBSCRIPTION)	
AGREEMENT; AND (2) THE GRANT OF ALL)	
OTHER REQUIRED APPROVALS AND RELIEF)	

COMMISSION STAFF'S FIRST 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 October 6, 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

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).

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 the Application, page 10. Confirm that Kentucky Power is not requesting authority to acquire assets through the Discretionary Sale without Commission approval of the transaction.

2. Refer to the Application, page 12. Confirm that the circuit breakers available to Kentucky Power are separately reserved for Kentucky Power or subject to availability during a Qualifying Event.

3. Refer to the Application, page 15. Explain the benefit to Kentucky Power of discretionary purchases if the replacement cost approximates the market price for the same equipment.

4. Refer to Case No. 2018-00287,² Kentucky Power's response to Commission Staff's First Request for Information (Staff First Request), Item 6. Provide an updated description of any overlap between employees, owners, members, directors, managers, officers, stockholders, voting or holding trusts, and operators of Grid Assurance LLC (Grid Assurance), AEP Transmission Holding Company, LLC (AEP Transmission Holding), and Kentucky Power, its parent, and affiliates. Include any overlap of position, e.g., the director of AEP Transmission Holding shall, by virtue of holding that position, be a manager of Grid Assurance.

5. Refer to Case No. 2018-00287, Kentucky Power's response to Staff's First Request, Item 8. Provide an update to the identity of the individuals involved in the decision for Kentucky Power to continue as a subscriber to Grid Assurance and describe their process for reaching that decision.

6. Refer to Case No. 2018-00287, Kentucky Power's response to Staff's First Request, Item 9.

² Case No. 2018-00287, *Electronic Application of Kentucky Power Company for 1) Authority Under KRS 278.2207(2) and KRS 278.2219 to the Extent Required to Enable the Company to Pay Fees and Costs Imposed by the Grid Assurance, LLC Subscription Agreement; 2) The Grant of All Other Required Approvals and Relief* (Ky. PSC Nov. 15, 2018).

- a. Provide an update on the current equity ownership levels.
- b. Provide an update on the method by which new subscribers may have an opportunity to become equity owners and how that would affect AEP Transmission Holding's equity interest.

7. Refer to Case No. 2018-00287, Kentucky Power's response to Staff's First Request, Item 12. Explain if there have been any updates on the volatility of the cost to be charged to Kentucky Power and any limits or parameters on how this cost may change in the future.

8. Refer to Case No. 2018-00287, Kentucky Power's response to Staff's First Request, Item 12.

- a. Explain if Kentucky Power has purchased equipment from Grid Assurance at a price greater than the market price.

- b. If so, provide a list of any equipment purchased above market price, the date of purchase, and the amount paid for each piece of equipment.

9. Refer to Case No. 2018-00287, Kentucky Power's response to Staff's First Request, Item 31.

- a. Provide any evaluations of the cost-effectiveness of subscribing to Grid Assurance, that Kentucky Power has completed.

- b. If no evaluation has been completed, explain why.

- c. If no evaluation has been completed, state if Kentucky Power plans to do an evaluation and when it should be completed.

10. Refer to Case No. 2018-00287, Kentucky Power's response to Staff's First Request, Item 32. Provide any monetary savings Kentucky Power has experienced because of subscribing to Grid Assurance.

11. If there are any changes in the Grid Assurance LLC Subscription Agreement that was tendered as Exhibit 2 to the Application filed in Case No, 2018-00287, outline the changes and tender a copy of the updated document.



Linda C. Bridwell, PE
Executive Director
Public Service Commission
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DATED OCT 03 2023

cc: Parties of Record

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