

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC JOINT APPLICATION OF	)	
AMERICAN ELECTRIC POWER COMPANY, INC.,	)	
KENTUCKY POWER COMPANY AND LIBERTY	)	CASE NO.
UTILITIES CO. FOR APPROVAL OF THE	)	2021-00481
TRANSFER OF OWNERSHIP AND CONTROL OF	)	
KENTUCKY POWER COMPANY	)	

COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION  
TO ATTORNEY GENERAL AND KENTUCKY INDUSTRIAL UTILITY CUSTOMERS

Attorney General (Attorney General), and Kentucky Industrial Utility Customers (KIUC), (jointly, Attorney General/KIUC) pursuant to 807 KAR 5:001, are to file with the Commission an electronic version of the following information. The information requested is due on March 14, 2022. The Commission directs the Attorney General/KIUC to the Commission's July 22, 2021 Order in Case No. 2020-00085<sup>1</sup> 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

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<sup>1</sup> 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.

The Attorney General/KIUC shall make timely amendment to any prior response if the Attorney General/KIUC obtain information that indicate the response was incorrect when made or, though correct when made, is now incorrect in any material respect. For any request to which the Attorney General/KIUC fail or refuse to furnish all or part of the requested information, the Attorney General/KIUC 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. When filing a paper containing personal information, the Attorney General/KIUC 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 Direct Testimony of Lane Kollen (Kollen Testimony), page 19. Explain whether any of these items are specific to Liberty Utilities Co.'s (Liberty) purchase of Kentucky Power Company (Kentucky Power), as opposed to another purchaser.

2. Refer to the Kollen Testimony, page 20. Provide the minimum size utility which could buy Kentucky Power to not lose economies of scale after a transfer from American Electric Power Company, Inc.

3. Refer to the Direct Testimony of Stephen J. Baron (Baron Testimony), pages 34–38.

a. Confirm that the amounts to be returned to Kentucky Power’s customers will be initially financed by Liberty, through debt or equity. Explain whether the regulatory liability would incur carrying charges. If not, explain why not.

b. Provide a description of the amounts paid and received by each party over the proposed ten-year amortization period.

4. Refer to Baron Testimony, page 10. Discuss the legal basis that underlies the Attorney General/KIUC’s expert witness proposal to authorize crediting customers through a cost mitigation credit rider.



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DATED MAR 02 2022

cc: Parties of Record

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