

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 SECOND POST-HEARING REQUEST FOR INFORMATION
TO LIBERTY UTILITIES CO.

Liberty Utilities Co. (Liberty), pursuant to 807 KAR 5:001, shall file with the Commission an electronic version of the following information. The information requested is due no later than April, 15, 2022. The Commission directs Liberty 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.

Liberty shall make timely amendment to any prior response if Liberty obtains information that indicates the response was incorrect when made or, though correct when made, is now incorrect in any material respect. For any request to which Liberty fails or refuses to furnish all or part of the requested information, Liberty 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, Liberty 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 Liberty's response to Commission Staff's First Post-Hearing Request for Information (Staff's First Post-Hearing Request), Item 1. Liberty's response was vague and nonresponsive. Provide the name(s) of the lenders for the delayed draw term syndicate facilities, including financing terms.

2. Refer to Liberty's response to Staff's First Post-Hearing Request, Item 11. Liberty's response was nonresponsive.

a. Explain why there are no documents that are publicly available for Items 11(a) and (b).

b. Liberty's response to Item 11(c) references a confidential filing in response to Attorney General 1-80. Provide a copy of a publicly available financing document as specified in Staff's Post-Hearing Request 11(c). If the only documents available are confidential, explain why public records are not available and file a copy of the confidential documents with the response to this post-hearing request.

3. Provide a comprehensive organizational chart for Algonquin Power & Utilities Corp. and its subsidiaries.



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DATED APR 12 2022

cc: Parties of Record

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