

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF KENTUCKY)	
POWER COMPANY FOR AN ORDER)	
APPROVING THE COMPANY'S AMENDED)	
TARIFF E.D.R. TO INCREASE CAPACITY)	CASE NO.
AVAILABLE TO BE SERVICED UNDER THE)	2022-00181
TARIFF AND FOR REQUIRED DEVIATIONS)	
FROM THE COMMISSION'S SEPTEMBER 24,)	
1990 ORDER IN ADMINISTRATIVE CASE NO.)	
327)	

COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
TO KENTUCKY POWER COMPANY

Kentucky Power Company (Kentucky Power), pursuant to 807 KAR 5:001, is to file with the Commission an electronic version of the following information. The information requested is due on July 1, 2022. 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

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).

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.

Kentucky Power shall make timely amendment to any prior response if Kentucky Power 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 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 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 Application, page 5, paragraphs 14 and 15, and page 10, paragraph 31. Discuss whether Kentucky Power generally plans to construct or purchase generation stations with capacity sufficient to serve the anticipated Tariff economic development rate (EDR) customers. If Kentucky Power plans to secure fixed assets to fulfill its capacity requirements, describe the benefit to Kentucky Power's

nonparticipating customers of the discounted rates for the anticipated Tariff EDR customers.

2. Refer to Kentucky Power's Application, page 17, paragraph 53, in which Kentucky Power states that deleting the discount offset provision of Tariff EDR would allow it and its customers to obtain the benefits of EDR agreements while protecting them from bearing the costs associated with any such agreement. Explain how the deletion of the discount offset provision would protect Kentucky Power's other customers from bearing the costs associated with a prospective EDR agreement.

3. Refer to Kentucky Power's Application, page 11, paragraph 35. State whether the anticipated contracts will include interruptible service. If so, provide the approximate amount of firm capacity included in the 482.5 MW of anticipated contract capacity.

4. Refer to Kentucky Power's Application, page 15, paragraphs 46, 47, and 48.

a. State whether the discounted rates will exceed the variable cost of service and contribute to Kentucky Power's fixed costs.

b. Describe how Kentucky Power proposes to demonstrate that the discounted rates will exceed the variable cost of service and contribute to Kentucky Power's fixed costs.

c. State whether the marginal costs will include capacity purchases.

5. Refer to Kentucky Power's Application, Exhibit 3, P.S.C. KY. No. 12, 1st Revised Sheet No. 37-1, paragraph 2 under terms and conditions. Confirm that Kentucky Power is removing the provision stating that customers receiving temporary service are not eligible for Tariff EDR. If confirmed, explain why customers receiving temporary service should now be eligible for Tariff EDR. If not confirmed, explain.



Linda C. Bridwell, PE
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Public Service Commission
P.O. Box 615
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DATED JUN 24 2022

cc: Parties of Record

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