

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

AN ELECTRONIC EXAMINATION OF THE	)	
APPLICATION OF THE FUEL ADJUSTMENT	)	CASE NO.
CLAUSE OF KENTUCKY POWER COMPANY	)	2022-00263
FROM NOVEMBER 1, 2021 THROUGH APRIL	)	
30, 2022	)	

COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION  
TO THE ATTORNEY GENERAL OF THE COMMONWEALTH OF KENTUCKY,  
AND KENTUCKY INDUSTRIAL UTILITY CUSTOMERS, INC.

The Attorney General of the Commonwealth of Kentucky, by and through the Office of Rate Intervention, and Kentucky Industrial Utility Customers, Inc. (collectively, Joint Intervenors), 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 January 6, 2023. The Commission directs Joint Intervenors 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

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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).

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 response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

Joint Intervenors shall make timely amendment to any prior response if Joint Intervenors obtain 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 Joint Intervenors fail or refuse to furnish all or part of the requested information, Joint Intervenors 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, Joint Intervenors 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 6 lines 15–23.

- a. If Kentucky Power Company is making energy purchases greater than 100 MW in a given hour, assuming the implementation of the Joint Intervenors'

generation unit startup cost recommendations, explain why the Base Unit Equivalent (BUE) method is a superior method to assuming that Kentucky Power Company would start up a second 100 MW combustion turbine (CT) or as many as needed to cover energy purchases in the existing Peaking Unit Equivalent (PUE) method.

b. Refer also to Kollen Testimony, page 20, lines 5–19. For example, if there were a 190 MW energy purchase and a second CT were to be included in the PUE method for purchases greater than 100 MW and applying the Joint Intervenors' generation unit startup cost recommendations, explain the appropriate way to calculate the economy purchase price cap.

c. Using the example in part b. above, compare that result to the 190 MW energy purchase using the PUE/BUE method.

2. In special circumstances where the utility is having trouble sourcing and maintaining adequate fuel supplies above PJM's ten day minimum supply requirement, explain whether the PUE/BUE method forces the utility into the choice of satisfying native load by drawing fuel supply below target levels and not violating PJM's ten day fuel supply rule or offering units into the day ahead market with an adder thus not running the units and purchasing high-cost power instead.

Nancy J. Vinsel for

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DATED DEC 15 2022

cc: Parties of Record

Case No. 2022-00263

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