

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC INVESTIGATION OF KENTUCKY)	CASE NO.
POWER COMPANY ROCKPORT DEFERRAL)	2022-00283
MECHANISM)	

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

The Attorney General of the Commonwealth of Kentucky, by and through the Office of Rate Intervention, and Kentucky Industrial Utility Customers (Attorney General/KIUC),¹ 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 November 8, 2022. The Commission directs Attorney General/KIUC to the Commission's July 22, 2021 Order in Case No. 2020-00085² 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 In accordance with Attorney General/KIUC's Notice of Witness Sharing Agreement (filed Sept. 15 2022), Attorney General/KIUC jointly sponsored intervenor witness testimony in this proceeding.

² 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.

Attorney General/KIUC shall make timely amendment to any prior response if Attorney General/KIUC 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 Attorney General/KIUC fails or refuses to furnish all or part of the requested information, 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, 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 Direct Testimony), page 11, lines 14-16. Explain why the expiration of the Rockport Unit Power Agreement (Rockport UPA) will likely "result in increased FAC rates."

2. Refer to the Kollen Direct Testimony, page 19, line 17 through page 20, line
3. Explain why the 12 months ending June 30, 2022, is the most appropriate time period to use for the Actual Rockport Offset.



Linda C. Bridwell, PE
Executive Director
Public Service Commission
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DATED NOV 01 2022

cc: Parties of Record

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