

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC TARIFF FILING OF KENTUCKY)	
POWER COMPANY FOR APPROVAL OF A)	CASE NO.
SPECIAL CONTRACT WITH EBON)	2022-00387
INTERNATIONAL, LLC)	

COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
TO MOUNTAIN ASSOCIATION, KENTUCKIANS FOR THE COMMONWEALTH,
APPALACHIAN CITIZENS' LAW CENTER, SIERRA CLUB, AND KENTUCKY
RESOURCES COUNCIL, INC.

Mountain Association, Kentuckians for the Commonwealth, Appalachian Citizens' Law Center, Sierra Club, and Kentucky Resources Council, Inc. (collectively, Joint Intervenors), pursuant to 807 KAR 5:001E, are to file with the Commission an electronic version of the following information. The information requested is due on March 8, 2023. The Commission directs Joint Intervenors 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.

Joint Intervenors shall make timely amendment to any prior response if Joint Intervenors obtain information that indicates the response was incorrect or incomplete when made or, though correct when made, is now incorrect or incomplete 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 5:001E, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

1. Refer to the Direct Testimony of Stacy L. Sherwood, page 19, lines 1–2 and 8–12. Kentucky Power Company is capacity short and will be purchasing both capacity and energy in the appropriate PJM markets. Further, it is required to offer its available generation units into the PJM energy markets. Consequently, the Big Sandy

generating station will run regardless depending on how its generation cost compares to the zonal hourly PJM LMP.

a. Given that the PJM capacity market and the energy markets are separate, provide further explanation as to the procurement of capacity sets the hourly LMP energy price.

b. Explain how the increase from the Ebon load can cause a significant increase in greenhouse gas emissions from the Big Sandy generation unit.



Linda C. Bridwell, PE
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Public Service Commission
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DATED FEB 22 2023

cc: Parties of Record

Case No. 2022-00387

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