

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF KENTUCKY	)	
POWER COMPANY FOR (1) A GENERAL	)	
ADJUSTMENT OF ITS RATES FOR ELECTRIC	)	
SERVICE; (2) APPROVAL OF TARIFFS AND	)	
RIDERS; (3) APPROVAL OF ACCOUNTING	)	CASE NO.
PRACTICES TO ESTABLISH REGULATORY	)	2023-00159
ASSETS AND LIABILITIES; (4) A	)	
SECURITIZATION FINANCING ORDER; AND (5)	)	
ALL OTHER REQUIRED APPROVALS AND	)	
RELIEF	)	

COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION  
TO THE ATTORNEY GENERAL OF THE COMMONWEALTH OF KENTUCKY, BY  
AND THROUGH THE OFFICE OF RATE INTERVENTION

The Attorney General of the Commonwealth of Kentucky, by and through the Office of Rate Intervention (Attorney General), pursuant to 807 KAR 5:001, shall file with the Commission an electronic version of the following information. The information requested is due on October 30, 2023. The Commission directs the Attorney General 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

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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).

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

The Attorney General shall make timely amendment to any prior response if the Attorney General obtains information that indicates the response was incorrect or incomplete when made or, though correct or complete when made, is now incorrect or incomplete in any material respect.

For any request to which the Attorney General fails or refuses to furnish all or part of the requested information, the Attorney General 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, the Attorney General 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 Stephen J. Baron (Baron Direct Testimony), page 8, lines 7-11. Explain if the Attorney General is aware of any different methods to reduce the subsidies while still mitigating the increase to the residential class.

2. Refer to the Baron Direct Testimony, page 10, lines 2–4. When discussing Kentucky Power’s fixed costs, explain if the Attorney General agrees with Kentucky Power’s proposed allocation increase to the Rate IGS considering Kentucky Power is not proposing to increase the customer charges and rather increase the billing kWh and billing kW.

3. Refer to the Direct Testimony of Lane Kollen (Kollen Direct Testimony), page 58, lines 3-9. Refer also to Commission Staff’s Second Request for Information, Item 64. Explain if the Attorney General agrees with how Kentucky Power uses working capital to finance coal inventory.

4. Refer to Kollen Direct Testimony, page 70, lines 11–12. Provide any workpapers or calculations performed by the Attorney General or Kentucky Industrial Customers, Inc. to support the assertion that the securitization rider, as proposed, achieves “significant quantifiable net benefits on a present value basis to customers”.

5. Refer to Kollen Direct Testimony, page 70, lines 20–22. Explain how “[t]he longer recovery period will mitigate the effects of the base rate increase resulting from this proceeding” is a preferred outcome to intergenerational customer subsidization of debt.

*Linda C. Bridwell*

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DATED     OCT 13 2023    

cc: Parties of Record

Case No. 2023-00159

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