

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF KENTUCKY)	
POWER COMPANY FOR A CERTIFICATE OF)	
PUBLIC CONVENIENCE AND NECESSITY TO)	CASE NO.
REPLACE AND UPGRADE PORTIONS OF THE)	2024-00343
BELLEFONTE STATION IN BOYD COUNTY,)	
KENTUCKY (BELLEFONTE STATION UPGRADE)	
PROJECT))	

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

Kentucky Power Company (Kentucky Power), pursuant to 807 KAR 5:001, shall file with the Commission an electronic version of the following information. The information requested is due on December 20, 2024. 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 governmental agency, be accompanied by a signed certification of the preparer or the

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).

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 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 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 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, 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 (Application).
 - a. Provide the anticipated journal entries for project completion including each fixed asset category that will be utilized.
 - b. Provide the expected annual depreciation amount. Include a breakdown of the costs by each component that reflects a different depreciation life and

provide the National Association of Regulatory Utility Commissioners (NARUC) depreciable life for each component.

- c. State when the first full year of depreciation is expected.

Refer to the Application, page 8–10, the section titled “Financial Aspects of The Project”:

- d. Provide an itemized list of all estimated costs, including material and labor costs related to paragraphs 31(a) through (e).

- e. Provide any estimate for the portion of the project that will fall within Ohio.

- 2. Refer to Application, page 9, paragraph 33. Provide a detailed explanation describing the “other internally generated funds” that will be used to fund the project and any documentation supporting the explanation.

- 3. State the reasoning for funding the Project through operating cash flow and other internally generated funds, rather than an issuance of debt.

- 4. Refer to the Application, page 10, paragraph 36. Provide calculations and supporting documentation to justify the estimated annual operating cost of \$40,000 for general maintenance and inspection.

- 5. Refer to the Application, page 13, paragraph 54, under the section titled “Commencement of Work and Anticipated In-Service Date.” Provide an expanded timeline for the project and estimated costs per quarter for each stage of construction.

- 6. Provide an estimated income statement for the Project after it has been put in service.

- 7. Explain why Kentucky Power considered only one project alternative.

8. Refer to Application and the following quotes used in reference to the Bellefonte station project: “complex and tightly compact” and “maintenance and any construction in its current configuration more difficult, expensive, and complex.” Explain whether the proposed project will address the current configuration, include specific examples of how this project will improve the current configuration of the Bellefonte station.

9. Refer to Application, page 8, paragraph 30. State who will own the portion of the project in Ohio and confirm the point at which ownership interest transfers.

10. Explain the delay in the filing of the application between the PJM approval, the year 2022, and the application date the date of the filing of this application.

11. Refer to the Direct Testimony of Daniel Barr (Barr Direct Testimony), page 2, lines 18–19 and page 3, lines 1–2. Explain what Kentucky Power intends to do with the retired 34.5 kV yard facilities.

12. Refer to Barr Direct Testimony, page 3, lines 9–10. Provide the specific details as to why the Station’s 69 kV underground power cables’ ampacity does not meet the necessary electric current rating requirements.

13. Refer to Barr Direct Testimony, page 4, lines 6–8.

a. Provide the number of times the 34 kV yard as well as its supporting equipment located in the 138/69 kV yard has experienced flooding for the years 2019 through November 2024.

b. Explain what Kentucky Power intends to do with this area and its supporting equipment upon retirement. Include in the explanation a list of any accounting adjustments that will be made.

14. Refer to Barr Direct Testimony, page 4, lines 21–23 and page 5, lines 1–2. Explain how the reuse or consolidation of the items will impact the useful life of the item. Address each item mentioned in the testimony individually in this response.

15. For the years 2019 through November 2024, provide a list of the outages and length of each outage resulting from the Bellefonte Station and its associated facilities.

16. For the years 2019 through November 2024, provide the number of voltage violations resulting from the Bellefonte station and its associated facilities.

17. Refer to the Direct Testimony of Nicholas Koehler (Koehler Direct Testimony), page 4, line 2. Explain and provide specific examples of what is meant by “overdutied by 115%.” Including but not limited to outages or limits exceeded by date and time for the period 2019 to November 2024.

18. Refer to Koehler Direct Testimony, page 4, lines 17–18. Explain whether this statement references any of the projects to be located outside of the boundaries of the Bellefonte Station. If not, explain what projects may be expected.

19. Provide an itemized list of the costs included in the Alternative Project’s expense.

20. Provide a rendering of the Bellefonte Station and associated facilities generally and then, a separate individual rendering for each item, include the following:

- a. Identify the area for the proposed expansion.
- b. Identify the items and areas to proposed to be retired.
- c. Identify the transmission line that will have to be relocated outside of the Bellefonte Station.

d. Identify the seven transmission lines that would have to be moved as proposed in the alternative project.

e. Provide a final proposed project layout of the entirety of the facilities.

21. Provide a map of each of the proposed associated projects located outside of the Bellefonte Station, including how the project connects back to the Station.



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Public Service Commission
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DATED DEC 09 2024

cc: Parties of Record

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