

**COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION**

In the Matter of:

Electronic Investigation Of Kentucky                    )  
Power Company's Need For The Enterprise            )     2019-00369  
Park Project    )

**DIRECT TESTIMONY OF**

**RANIE K. WOHNHAS**

**ON BEHALF OF KENTUCKY POWER COMPANY**

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**CASE NO. 2019-00369**

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**I. INTRODUCTION**

1 **Q: PLEASE STATE YOUR NAME, POSITION AND BUSINESS ADDRESS.**

2 A: My name is Ranie K. Wohnhas. My position is Vice President, Regulatory and Finance,  
3 Kentucky Power Company (“Kentucky Power” or the “Company”). My business address  
4 is 855 Central Avenue, Suite 200, Ashland, Kentucky 41101.

**II. BACKGROUND**

5 **Q: PLEASE SUMMARIZE YOUR EDUCATIONAL BACKGROUND AND**  
6 **BUSINESS EXPERIENCE.**

7 A: I received a Bachelor of Science degree with a major in accounting from Franklin  
8 University, Columbus, Ohio in December 1981. I began work with Columbus Southern  
9 Power Company in 1978, and worked in various customer services and accounting  
10 positions. In 1983, I transferred to Kentucky Power Company and worked in the areas of  
11 accounting, rates, and customer services. I became the Billing and Collections Manager  
12 in 1995. My duties included overseeing all billing and collection activity for the  
13 Company. In 1998, I transferred to Appalachian Power Company and worked in the rates  
14 department. In 2001, I transferred to the American Electric Power Service Corporation  
15 (“AEPSC”) working as a Senior Rate Consultant. In July 2004, I transferred back to  
16 Kentucky Power Company and assumed the position of Manager, Business Operations  
17 Support. I was promoted to Director in April 2006. I was promoted to Managing  
18 Director, Regulatory and Finance effective September 1, 2010. I assumed my current  
19 position in August 2019.

20 **Q: WHAT ARE YOUR RESPONSIBILITIES AS VICE PRESIDENT,**  
21 **REGULATORY AND FINANCE?**

1 A: I am primarily responsible for managing the regulatory and financial strategy for  
2 Kentucky Power. This includes planning and executing rate filings for both federal and  
3 state regulatory agencies, as well as filings for certificates of public convenience and  
4 necessity before this Commission. I am also responsible for managing the Company's  
5 financial operating plans. Included as part of this responsibility is the preparation and  
6 coordination of various capital and O&M operating budgets with other American Electric  
7 Power Company, Inc. affiliates. I work with various AEPSC departments to ensure that  
8 adequate resources such as debt, equity, and cash are available to build, operate, and  
9 maintain Kentucky Power's electric system assets used to provide service to our retail  
10 and wholesale customers. I report directly to Brett Mattison, President and Chief  
11 Operating Officer of Kentucky Power, in my role as Vice President, Regulatory and  
12 Finance.

13 **Q: HAVE YOU PREVIOUSLY TESTIFIED BEFORE THIS COMMISSION?**

14 A: Yes, I have testified on multiple occasions in a wide variety of proceedings, including  
15 numerous rate cases, fuel adjustment clause cases, an environmental compliance plan  
16 case, the proceeding to transfer a fifty percent undivided interest in the Mitchell  
17 generating station to Kentucky Power, and in connection with the Company's application  
18 to convert Big Sandy Unit 1 to a gas-fired unit. Most pertinent to this proceeding, I filed  
19 testimony in Case No. 2018-00209.<sup>1</sup>

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<sup>1</sup> *In the Matter of: Electronic Application Of Kentucky Power Company For A Certificate Of Public Convenience And Necessity To Construct A 138 kV Transmission Line And Related Facilities In Pike And Floyd Counties, Kentucky (Enterprise Park Economic And Area Improvements Project)*, Case No. 2018-000209 (Ky. P.S.C. Filed August 10, 2018).

### **III. PURPOSE OF TESTIMONY**

1 **Q: WHAT IS THE PURPOSE OF YOUR TESTIMONY IN THIS PROCEEDING?**

2 A: I am testifying in response to the Commission’s October 8, 2019 order initiating this  
3 proceeding. That order directed Kentucky Power to “file testimony setting forth in detail  
4 the reasons why it now has a need for the Enterprise Park Project sufficient to justify  
5 retaining the conditional CPCN granted in Case No. 2018-00209 and the reasons, if any  
6 exist, why the conditional CPCN should not be canceled.”<sup>2</sup>

### **IV. RESPONSE TO COMMISSION’S ORDER AND KENTUCKY POWER’S FUTURE NEEDS WITH RESPECT TO THE FACILITIES**

7 **Q. DOES KENTUCKY POWER OPPOSE THE CANCELLATION OF THE**  
8 **COMPANY’S CONDITIONAL CERTIFICATE OF PUBLIC CONVENIENCE**  
9 **AND NECESSITY THAT WAS ISSUED BY THE COMMISSION IN CASE NO.**  
10 **2018-00209 ON DECEMBER 6, 2018?**

11 A. No. The Commission’s grant of the certificate was expressly conditioned on Kentucky  
12 Power filing of record “in the post-case correspondence file [of Case No. 2018-00209] a  
13 copy of the written statement from Enerblu providing reasonable assurance that sufficient  
14 financing has been secured to complete construction of its planned facility.”<sup>3</sup> On January  
15 17, 2019 Enerblu, Inc. announced it was delaying the construction of its battery  
16 manufacturing facility. On June 3, 2019, Enerblu, Inc. filed a voluntary petition under  
17 Chapter 7 of the Bankruptcy Code. It thus appears that Enerblu will not provide the

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<sup>2</sup> Order, *In the Matter of: Electronic Investigation Of Kentucky Power Company’s Need For The Enterprise Park Project*, Case No. 2019-00369 at 3 (Ky. P.S.C. October 9, 2019).

<sup>3</sup> Order, *In the Matter of: Electronic Application Of Kentucky Power Company For A Certificate Of Public Convenience And Necessity To Construct A 138 kV Transmission Line And Associated Facilities In Pike And Floyd Counties (Enterprise Park Economic and Area Improvements Project)*, Case No. 2018-00209 at 18 (Ky. P.S.C. December 6, 2018).

1 required “reasonable assurance,” and as a result the condition precedent to the certificate  
2 granted by the Commission in Case No. 2018-00209 will not be satisfied. The  
3 cancellation of the conditional certificate of public convenience and necessity issued in  
4 Case No. 2018-00209 is appropriate under these circumstances.

5 **Q: DOES A NEED STILL EXIST FOR THE TRANSMISSION LINE AND**  
6 **SUBSTATION WORK DESCRIBED IN THE COMPANY’S APPLICATION IN**  
7 **CASE NO. 2018-00209 NOTWITHSTANDING ENERBLU’S ABANDONMENT**  
8 **OF ITS PLANS TO CONSTRUCT ITS BATTERY MANUFACTURING CAMPUS**  
9 **IN ENTERPRISE PARK?**

10 A: Yes. The upgrades that were the subject of Case No. 2018-00209 (the “Enterprise Park  
11 Project”) continue to be required to address PJM Criteria violations and other reliability  
12 concerns in the Company’s Pikeville District. In particular, the transfer of the load  
13 currently served by the Company’s existing Fords Branch 46 kV Substation to the  
14 proposed Kewanee 138 kV Substation, coupled with the retirement of the existing Fords  
15 Branch Substation and the construction of the proposed five mile double circuit 138 kV  
16 transmission line, is required to address the thermal and voltage violations on the  
17 Company’s 46 kV subtransmission network.

18 **Q. DID KENTUCKY POWER IDENTIFY THESE NEEDS IN ITS FILINGS IN**  
19 **CASE NO. 2018-00209?**

20 A. Yes. These requirements were addressed at paragraphs 16, 41-42 of the application, page  
21 3 of my testimony, as well as pages 16, 23-24 (retirement of the Fords Branch 46 kV  
22 Substation), 18-19 (the Kewanee 138 kV Transmission Line Extension), 19-20, 21 (the  
23 Kewanee 138 kV Substation), and 24 (the upgrade of the Cedar Creek 138/69/46 kV

1 Substation). Finally, Company Witness Lasslo testified in response to KPSC 2-3 in Case  
2 No. 2018-00209 that “the majority of the Enterprise Park Economic & Area  
3 Improvements Transmission Project would be required in the absence of the Enerblu,  
4 Inc. manufacturing campus.”

5 **Q. IS KENTUCKY POWER REVIEWING THE ENTERPRISE PARK ECONOMIC**  
6 **& AREA IMPROVEMENTS TRANSMISSION PROJECT NOW THAT**  
7 **ENERBLU, INC. HAS INDICATED IT DOES NOT INTEND TO PROCEED**  
8 **WITH ITS ENTERPRISE PARK MANUFACTURING CAMPUS?**

9 A. Yes. The Company is completing its analysis and planning, as well as coordinating with  
10 PJM and other stakeholders through PJM’s Regional Transmission Expansion Plan  
11 process, to develop the information necessary to file an application with the Commission  
12 for approval of those portions of the project that continue to be required to provide  
13 adequate, efficient, and reasonable service to Kentucky Power’s customers, regardless of  
14 the absence of the Enerblu facility. Once that analysis and coordination process are  
15 complete, the Company anticipates filing a new application for approval at the  
16 appropriate time.

17 **Q: DOES THIS CONCLUDE YOUR TESTIMONY?**

18 A: Yes.

