

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC 2019 INTEGRATED)	
RESOURCE PLANNING REPORT OF)	CASE No.
KENTUCKY POWER COMPANY)	2019-00443

ATTORNEY GENERAL’S SUPPLEMENTAL DATA REQUESTS

Comes now the Attorney General of the Commonwealth of Kentucky, by and through his Office of Rate Intervention, and submits these Supplemental Data Requests to Kentucky Power Company [hereinafter referred to as “KPCo” or “the Company”] to be answered by the date specified in the Commission’s Orders of Procedure, and in accord with the following:

- (1) In each case where a request seeks data provided in response to a staff request, reference to the appropriate request item will be deemed a satisfactory response.
- (2) Identify the witness who will be prepared to answer questions concerning each request.
- (3) Repeat the question to which each response is intended to refer. The Office of the Attorney General can provide counsel for KPCo with an electronic version of these questions, upon request.
- (4) These requests shall be deemed continuing so as to require further and supplemental responses if the company receives or generates additional information within the scope of these requests between the time of the response and the time of any hearing conducted hereon.
- (5) Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association, be accompanied by a signed certification of the preparer or 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.

(6) If you believe any request appears confusing, request clarification directly from Counsel for the Office of Attorney General.

(7) To the extent that the specific document, workpaper or information as requested does not exist, but a similar document, workpaper or information does exist, provide the similar document, workpaper, or information.

(8) To the extent that any request may be answered by way of a computer printout, identify each variable contained in the printout which would not be self-evident to a person not familiar with the printout.

(9) If the company has objections to any request on the grounds that the requested information is proprietary in nature, or for any other reason, notify the Office of the Attorney General as soon as possible.

(10) As used herein, the words “document” or “documents” are to be construed broadly and shall mean the original of the same (and all non-identical copies or drafts thereof) and if the original is not available, the best copy available. These terms shall include all information recorded in any written, graphic or other tangible form and shall include, without limiting the generality of the foregoing, all reports; memoranda; books or notebooks; written or recorded statements, interviews, affidavits and depositions; all letters or correspondence; telegrams, cables and telex messages; contracts, leases, insurance policies or other agreements; warnings and caution/hazard notices or labels; mechanical and electronic recordings and all information so stored, or transcripts of such recordings; calendars, appointment books, schedules, agendas and diary entries; notes or memoranda of conversations (telephonic or otherwise), meetings or conferences; legal pleadings and transcripts of legal proceedings; maps, models, charts, diagrams, graphs and other demonstrative materials; financial

statements, annual reports, balance sheets and other accounting records; quotations or offers; bulletins, newsletters, pamphlets, brochures and all other similar publications; summaries or compilations of data; deeds, titles, or other instruments of ownership; blueprints and specifications; manuals, guidelines, regulations, procedures, policies and instructional materials of any type; photographs or pictures, film, microfilm and microfiche; videotapes; articles; announcements and notices of any type; surveys, studies, evaluations, tests and all research and development (R&D) materials; newspaper clippings and press releases; time cards, employee schedules or rosters, and other payroll records; cancelled checks, invoices, bills and receipts; and writings of any kind and all other tangible things upon which any handwriting, typing, printing, drawings, representations, graphic matter, magnetic or electrical impulses, or other forms of communication are recorded or produced, including audio and video recordings, computer stored information (whether or not in printout form), computer-readable media or other electronically maintained or transmitted information regardless of the media or format in which they are stored, and all other rough drafts, revised drafts (including all handwritten notes or other marks on the same) and copies of documents as hereinbefore defined by whatever means made.

(11) For any document withheld on the basis of privilege, state the following: date; author; addressee; indicated or blind copies; all persons to whom distributed, shown, or explained; and, the nature and legal basis for the privilege asserted.

(12) In the event any document called for has been destroyed or transferred beyond the control of the company, state: the identity of the person by whom it was destroyed or transferred, and the person authorizing the destruction or transfer; the time, place, and

method of destruction or transfer; and, the reason(s) for its destruction or transfer. If destroyed or disposed of by operation of a retention policy, state the retention policy.

(13) Provide written responses, together with any and all exhibits pertaining thereto, in one or more bound volumes, separately indexed and tabbed by each response, in compliance with Kentucky Public Service Commission Regulations.

(14) “And” and “or” should be considered to be both conjunctive and disjunctive, unless specifically stated otherwise.

(15) “Each” and “any” should be considered to be both singular and plural, unless specifically stated otherwise.

Respectfully submitted,
DANIEL CAMERON
ATTORNEY GENERAL



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Certificate of Service and Filing

Pursuant to the Commission's Orders dated March 17, 2020 and March 24, 2020 in Case No. 2020-00085, and in accord with all other applicable law, Counsel certifies that an electronic copy of the forgoing was served and filed by e-mail to the following. Further, the Attorney General will submit the paper originals of the foregoing to the Commission within 30 days after the Governor lifts the current state of emergency.

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This 4th day of June, 2020.



Assistant Attorney General

Electronic 2019 Integrated Resource Planning Report of Kentucky Power Company
Case No. 2019-00443
Attorney General's Supplemental Data Requests

1. Explain whether the Covid-19 crisis has changed any of the assumptions and/or conclusions reached in the current IRP. If so, explain in detail.
2. Reference the response to AG DR 1-10, confidential attachment. Provide a description of the causes for the following costs:
 - a. [REDACTED]
 - b. [REDACTED]
 - c. [REDACTED]
3. Reference the response to AG DR-1-16, attachment 1.
 - a. Explain the reason for the capital costs for Big Sandy Unit-2 for the years 2016-2019.
 - b. With regard to fixed O&M for the two Mitchell units, confirm that costs have increased almost every year. Explain whether KPCo expects this trend to continue, and if so, explain why.
 - c. Confirm that the Mitchell Units' net capacity factor has decreased for each year from 2017-2019.
4. Reference the response to AG DR 1-18. Provide the same information for each of the past three calendar years, on an annualized basis.
5. Reference the response to AG DR 1-19 (a). The link provided depicts nearly 600 pages of supplemental transmission projects throughout the entire PJM footprint. Identify all such projects that are applicable solely to KPCo's service territory, and provide them in a separate Excel attachment.
6. Reference the response to AG DR 1-20, Attachment 1. Explain what is meant by Account 5550124, "PJM Implicit Congestion-LSE," and include in your response: (i) an identification and explanation of any costs that are normally included within this account; and (ii) an explanation of how this account differs from account no. 4470126.
7. Reference the response to AG DR 1-20 (a). Given that an aeroderivative (AD) plant does not utilize the waste heat to generate steam, explain:
 - a. whether a standard combined cycle gas plant (CC) is more efficient than an AD design; and
 - b. the factors that AEP took into consideration in determining an AD unit to be more cost-effective than a CC plant, and in what scenarios that is true;
 - c. in what scenarios a CC plant would become more cost effective than an AD unit.

8. Reference the response to AG DR 1-28 (c), wherein the Company states “[t]he IRP modeling did not explicitly consider other AEP affiliates generating resources as resource options for this IRP.” Explain how and to what extent the Company did consider the potential for procuring any excess capacity that might be available at any one or more plants in which any AEP affiliates have an ownership interest.
9. Reference the response to AG DR 1-29 (a)-(b). Describe what, if any analyses the Company undertook to determine whether PPAs might be more cost-effective than self-build options. Include in your response the value of any RECs that might be available under either option.
10. Reference the response to AG DR 1-29 (e), wherein the Company responded that no additional congestion costs were included in the Preferred Plan. Explain whether the Company’s analysis identified any new congestion costs, and if so, explain why they were not included within the Preferred Plan.
11. Reference the response to AG DR 1-33 (a). Explain whether there are any material differences between the two depreciation studies, and if so, explain the reasons therefor.
12. Reference the response to AG DR 1-38. Explain why a battery resource was not selected in the modeling results.
13. Reference the response to AG DR 1-48 (c). Given that on-peak energy prices remain lower than wind resources (even with PTC subsidies) throughout the planning period, explain how wind can remain the least cost resource.