

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

**In the Matter of:**

<b>ELECTRONIC APPLICATION OF KENTUCKY</b>	)	
<b>POWER COMPANY FOR (1) A GENERAL</b>	)	
<b>ADJUSTMENT OF ITS RATES FOR ELECTRIC</b>	)	
<b>SERVICE; (2) APPROVAL OF TARIFFS AND</b>	)	
<b>RIDERS; (3) APPROVAL OF ACCOUNTING</b>	)	<b>CASE NO.</b>
<b>PRACTICES TO ESTABLISH REGULATORY</b>	)	<b>2020-00174</b>
<b>ASSETS AND LIABILITIES; (4) APPROVAL OF</b>	)	
<b>A CERTIFICATE OF PUBLIC CONVENIENCE</b>	)	
<b>AND NECESSITY; AND (5) ALL OTHER</b>	)	
<b>REQUIRED APPROVALS AND RELIEF</b>	)	

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**SIERRA CLUB’S RESPONSE TO THE JUNE 3, 2021, MOTION OF KENTUCKY  
POWER COMPANY FOR REHEARING**

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Sierra Club hereby responds to the June 3, 2021, Motion of Kentucky Power Company (“KPC” or the “Company”) for Rehearing (the “Motion”) in the above-captioned case.<sup>1</sup> Sierra Club opposes KPC’s Motion on two grounds.

First, Sierra Club respectfully submits that the Motion does not satisfy the criteria for rehearing. KPC does not identify new evidence that was not readily discoverable at the time of the original hearings, or some other valid reason for rehearing. Rather, KPC essentially rehashes arguments that were robustly presented to the Commission and were fairly addressed by the Commission’s May 14, 2021, Order.

Second, to the extent the Commission does revisit the merits of the arguments raised in the Motion, Sierra Club respectfully submits that KPC’s arguments are unavailing. Sierra Club

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<sup>1</sup> On February 2, 2021, KPC filed a motion for rehearing concerning issues distinct from those raised in the June 3, 2021, Motion at issue. The Commission ruled on that earlier motion on February 22, 2021.

believes that the reasoning and conclusions in the Commission's May 14, 2021, Order, were well-founded and withstand the Motion's critiques. Moreover, Sierra Club believes that the testimony and prior briefing in this case, in particular, the respective submissions of the Joint intervenors and KYSEIA, not to mention their concurrent responses to the Motion, effectively rebut the Motion's contentions.

For the foregoing reasons, Sierra Club respectfully opposes KPC's Motion.

Dated: June 10, 2021

Respectfully submitted,



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**CERTIFICATE OF SERVICE**

This is to certify that the foregoing copy of SIERRA CLUB’S RESPONSE TO KENTUCKY POWER COMPANY’S MOTION FOR REHEARING in this action is being electronically transmitted to the Commission on June 10, 2021; and that there are currently no parties that the Commission has excused from participation by electronic means in this proceeding. Per the Commission’s general standing Order issued in Case No. 2020-00085 on March 16, 2020, this filing will not be mailed in paper medium to the Commission.



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JOE F. CHILDERS