

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

**In the Matter of:**

|   |   |                   |
|---|---|-------------------|
| <b>ELECTRONIC APPLICATION OF KENTUCKY</b> | ) |                   |
| <b>POWER COMPANY FOR APPROVAL OF A</b>    | ) |                   |
| <b>CERTIFICATE OF PUBLIC CONVENIENCE</b>  | ) |                   |
| <b>AND NECESSITY FOR ENVIRONMENTAL</b>    | ) | <b>CASE NO.</b>   |
| <b>PROJECT CONSTRUCTION AT THE</b>        | ) | <b>2021-00004</b> |
| <b>MITCHELL GENERATING STATION, AN</b>    | ) |                   |
| <b>AMENDED ENVIRONMENTAL COMPLIANCE</b>   | ) |                   |
| <b>PLAN, AND REVISED ENVIRONMENTAL</b>    | ) |                   |
| <b>SURCHARGE TARIFF SHEETS</b>            | ) |                   |

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**SIERRA CLUB’S INITIAL REQUESTS FOR INFORMATION TO KENTUCKY  
POWER COMPANY**

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Pursuant to the Commission’s February 12, 2021, and March 10, 2021, Orders, Sierra Club hereby propounds the following initial requests for information on Kentucky Power Company (“KPC” or the “Company”) in the above-captioned proceeding. The Company shall answer these data requests in the manner and timeframe set forth in the aforementioned Orders, including by no later than May 5, 2021. Please produce the requested documents in electronic format whenever possible, and to the following recipients:

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Wherever the response to an interrogatory or request consists of a statement that the requested information is already available to Sierra Club, provide a detailed citation to the

document that contains the information. This citation shall include the title of the document, relevant page number(s), and to the extent possible paragraph number(s) and/or chart(s)/table(s)/figure number(s). In the event that any document referred to in response to any request has been destroyed, specify the date and the manner of such destruction, the reason for such destruction, the person authorizing the destruction and the custodian of the document at the time of its destruction.

Sierra Club reserves the right to serve supplemental and/or revised discovery requests as permitted in this proceeding.

### **DEFINITIONS**

Unless otherwise specified in each individual interrogatory or request, “you,” “your,” the “Company,” or “KPC,” refers to Kentucky Power Company, and its affiliates, officers, directors, employees, and agents.

“AEP” or “AEPSC” mean American Electric Power Service Corporation and its affiliates, officers, directors, employees, and agents.

“And” and “or” shall be construed either conjunctively or disjunctively as required by the context to bring within the scope of these interrogatories and requests for production of documents any information which might be deemed outside their scope by another construction.

“Any” means all or each and every example of the requested information.

“CCR” means coal combustion residuals, or the so-called CCR Rule, the federal regulation/rulemaking that regulates the same.

“Communication” means any transmission or exchange of information between two or more persons, whether orally or in writing, and includes, without limitation, any conversation or

discussion by means of letter, telephone, note, memorandum, telegraph, telex, telecopy, cable, email, or any other electronic or other medium.

“Document” refers to written matter of any kind, regardless of its form, and to information recorded on any storage medium, whether in electrical, optical or electromagnetic form, and capable of reduction to writing by the use of computer hardware and software, and includes all copies, drafts, proofs, both originals and copies either (1) in the possession, custody or control of the Company regardless of where located, or (2) produced or generated by, known to or seen by the Company, but now in their possession, custody or control, regardless of where located whether or still in existence.

- Such “documents” shall include, but are not limited to, applications, permits, monitoring reports, computer printouts, contracts, leases, agreements, papers, photographs, tape recordings, transcripts, letters or other forms of correspondence, folders or similar containers, programs, telex, TWX and other teletype communications, memoranda, reports, studies, summaries, minutes, minute books, circulars, notes (whether typewritten, handwritten or otherwise), agenda, bulletins, notices, announcements, instructions, charts, tables, manuals, brochures, magazines, pamphlets, lists, logs, telegrams, drawings, sketches, plans, specifications, diagrams, drafts, books and records, formal records, notebooks, diaries, registers, analyses, projections, email correspondence or communications and other data compilations from which information can be obtained (including matter used in data processing) or translated, and any other printed, written, recorded, stenographic, computer-generated, computer-stored, or electronically stored matter, however and by whomever produced, prepared, reproduced, disseminated or made.

- Without limitation, the term “control” as used in the preceding paragraphs means that a document is deemed to be in your control if you have the right to secure the document or a copy thereof from another person or public or private entity having actual possession thereof. If a document is responsive to a request, but is not in your possession or custody, identify the person with possession or custody. If any document was in your possession or subject to your control, and is no longer, state what disposition was made of it, by whom, the date on which such disposition was made, and why such disposition was made.
- For purposes of the production of “documents,” the term shall include copies of all documents being produced, to the extent the copies are not identical to the original, thus requiring the production of copies that contain any markings, additions or deletions that make them different in any way from the original.

“ELG” means the federal Effluent Limitations Guidelines regulation.

“ICAP” means installed capacity, or nameplate basis.

“Identify” means:

- With respect to a person, to state the person’s name, address and business relationship (e.g., “employee”) vis-à-vis the Company;
- With respect to a document, to state the nature of the document in sufficient detail for identification in a request for production, its date, its author, and to identify its custodian. If the information or document identified is recorded in electrical, optical or electromagnetic form, identification includes a description of the computer hardware or software required to reduce it to readable form.

“O&M” means operations and maintenance, and includes all items and costs typically associated in the industry under that umbrella.

“Relating to” or “concerning” means and includes pertaining to, referring to, or having as a subject matter, directly or indirectly, expressly or implied, the subject matter of the specific request.

“UCAP” means unforced capacity.

“Workpapers” are defined as original, electronic, machine-readable, unlocked, Excel format (where possible) with formulas intact.

### **PRIVILEGE**

If you claim a privilege including, but not limited to, the attorney-client privilege or the work product doctrine, as grounds for not fully and completely responding to any interrogatory or request for production, describe the basis for your claim of privilege in sufficient detail so as to permit Sierra Club or the Commission to evaluate the validity of the claim. With respect to documents for which a privilege is claimed, produce a “privilege log” that identifies the author, recipient, date and subject matter of the documents or interrogatory answers for which you are asserting a claim of privilege and any other information pertinent to the claim that would enable Sierra Club or the Commission to evaluate the validity of such claims.

### **TIME**

Unless otherwise provided, the applicable time period for each of these requests for information is January 1, 2016, to the present.

### **REQUESTS FOR INFORMATION**

1. For each of the Mitchell units, state whether or not PLEXOS models the units to run at their economic minimums. If yes, provide the economic minimum (MW).

2. Provide the hourly import limits in PLEXOS to KPC from PJM for all years of the analysis period.
3. Provide the hourly export limits in PLEXOS from KPC to PJM for all years of the analysis period.
4. Provide the hourly energy market prices used in the PLEXOS model, for all years of the analysis period.
5. For each solar resource offered to the PLEXOS model as part of the capacity optimization, for each of the years that resource is available as a resource option, provide the following exactly as input into the PLEXOS model:
  - a. The capital cost of that resource.
  - b. The fixed O&M associated with that resource, and the source of this assumption.
  - c. If neither (a) nor (b) are applicable, provide the levelized cost of that resource in \$/MWh.
  - d. If none of the above are applicable, describe how capital and operating costs of each solar resource are input into PLEXOS and provide those data.
  - e. All workpapers that derive the cost of the resource, as input into PLEXOS, documenting original source data, with all cells unlocked and formulae intact
  - f. Any and all annual limits for additions of these resources.
  - g. Any and all cumulative limits for additions of these resources.
6. For each wind resource offered to the PLEXOS model as part of the capacity optimization, for each of the years that resource is available as a resource option, provide the following exactly as input into the PLEXOS model:
  - a. The capital cost of that resource.
  - b. The fixed O&M associated with that resource, and the source of this assumption.
  - c. If neither (a) nor (b) are applicable, provide the levelized cost of that resource in \$/MWh.
  - d. If none of the above are applicable, describe how capital and operating costs of each wind resource are input into PLEXOS and provide those data.
  - e. All workpapers that derive the cost of the resource, as input into PLEXOS, documenting original source data, with all cells unlocked and formulae intact
  - f. Any and all annual limits for additions of these resources.
  - g. Any and all cumulative limits for additions of these resources.

7. For each battery resource offered to the PLEXOS model as part of the capacity optimization, for each of the years that resource is available as a resource option, provide the following exactly as input into the PLEXOS model:
  - a. The capital cost of that resource.
  - b. The fixed O&M associated with that resource, and the source of this assumption.
  - c. If neither (a) nor (b) are applicable, describe how capital and operating costs of each solar resource are input into PLEXOS and provide those data.
  - d. All workpapers that derive the cost of the resource, as input into PLEXOS, documenting original source data, with all cells unlocked and formulae intact.
  - e. Any and all annual limits for additions of these resources.
  - f. Any and any cumulative limits for additions of these resources.
  
8. For each of the solar, wind and battery storage resources offered to PLEXOS as replacement resources:
  - a. Provide EIA's assumed capital cost declines for each technology.
  - b. Discuss whether and how those cost declines are reflected in the price of resources, as they are input into the PLEXOS model for KPC's replacement resources, including for each of the following: (i) solar; (ii) wind; and (iii) battery storage.
    - i. If the answer to (b) is yes, provide supporting workpapers that demonstrate how EIA's assumed declines in capital costs over time are incorporated in KPC's calculations of resource costs that are input into the PLEXOS model.
    - ii. If the answer to (b) is no, explain why not.
  
9. For each of the solar, wind, or battery storage resources offered to the PLEXOS model, provide the assumed interconnection cost associated with each of those resources. Further, provide any and all workpapers demonstrating the incorporation of these costs into the cost of the resource as it was entered into the PLEXOS model, in machine-readable format with cells unlocked and formulae intact.
  
10. Refer to KPC's response to KIUC-AG 1-2, Attachment 17, the AEP Fundamentals Forecast, Base No Carbon. For each of the Mitchell units, identify the fuel forecast used in PLEXOS. If multiple fuels are used at a single unit, indicate all the fuels and the blend of each as a percent.
  
11. Refer to KPC's response to SC 1-27(d)(iii). Please perform the calculation, and provide your results along with associated workpapers, as requested in that RFI. If the Company cannot or will not perform the calculation, please discuss why.

12. Refer to KPC's response to SC 1-29.

- a. Explain whether or not KPC's officers, employees, consultants, or other agents were involved in creating, approving, or otherwise contributing to AEP's so-called Climate Scenario Analysis, entitled *Powering Forward To Net-Zero: AEP's Climate Impact Analysis*, published on March 22, 2021 (available at: <https://www.aep.com/news/releases/read/6051>), including its underlying analysis.
  - i. If yes, please identify all such persons and discuss their role in performing the underlying analysis, drafting the document, reviewing and approving the document, or otherwise, including the timeline of such involvement.
- b. Confirm that all of KPC's responses to SC 1-29 likewise apply to aforementioned report (at least, among any other/prior possible AEP climate- and carbon-related reports, analyses, plans, etc.).
  - i. If not confirmed, please explain how KPC's responses to SC 1-29—including, but not limited to, subpart (d), regarding whether and how KPC takes into account AEP's carbon-reduction pledges/goals in identifying, weighing, and deciding between the CCR and ELG compliance options for Mitchell—differ with respect to that report, or may differ in the future.
- c. Please provide copies of the analysis and associated workpapers that underlie the aforementioned report's "Fast Transition" and "Business As Usual" scenarios, at least as they pertain to Mitchell (see, e.g., p.30).
  - i. If KPC does not possess, and is not able to obtain access to, such analysis and workpapers, please so state, and explain why.
- d. Please explain whether KPC (including staff and consultants) has the technical ability to model a 100% Clean Energy future portfolio (putting aside whether the Company would think that worthwhile, or would choose to pursue such a portfolio).

Dated: April 20, 2021

Respectfully submitted,



*Of counsel*  
(not licensed in Kentucky):

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**CERTIFICATE OF SERVICE**

This is to certify that the foregoing copy of the SIERRA CLUB'S SUPPLEMENTAL REQUESTS FOR INFORMATION TO KENTUCKY POWER COMPANY in this action is being electronically transmitted to the Commission on April 20, 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