CHILDERS & BAXTER, PLLC

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Joe F. Childers, Esquire Bethany N. Baxter, Esquire

VIA ELECTRONIC FILING

June 8, 2021

Linda C. Bridwell Executive Director Kentucky Public Service Commission 211 Sower Boulevard Frankfort, Kentucky 40601

> Re: Sierra Club's Responses to Kentucky Power Company's Data Requests to Sierra Club in Case No. 2021-4, Electronic Application of Kentucky Power Company for Approval of a Certificate of Public Convenience and Necessity for Environmental Case Project Construction at the Mitchell Generation Station, an Amended Environmental Compliance Plan, and Revised Environmental Surcharge Tariff Sheets

Dear Ms. Bridwell:

Sierra Club submits this cover letter for the electronic filing of its Responses to Kentucky Power Company's Data Requests to Sierra Club, along with the Affidavit of Rachel Wilson in support thereof, in Case No. 2021-4, Electronic Application of Kentucky Power Company for Approval of a Certificate of Public Convenience and Necessity for Environmental Case Project Construction at the Mitchell Generation Station, an Amended Environmental Compliance Plan, and Revised Environmental Surcharge Tariff Sheets. Please note that two of the seven workpapers of Sierra Club expert witness Rachel Wilson that are being filed in response to the Company's Request No. 1 contain information that the Company has designated as confidential. Accordingly, Sierra Club is publicly filing only the five non-confidential workpapers, to honor and maintain the Company's earlier confidential treatment, which the Commission allowed.

In parallel, Sierra Club is providing the two confidential workpapers with the Commission, the Company, and the other parties, which have executed the Non-Disclosure Agreement in force in this proceeding.

This filing is timely filed, in accordance with the amended procedural schedule set forth in the Commission's March 10, 2021, Order. Per the Commission's general standing Order issued in Case No. 2020-00085 on March 16, 2020, related to the current Covid-19 emergency, this filing is not being mailed in paper medium to the Commission in accordance with normal practice; however, per the same Order, Sierra Club will file an original of the documents within 30 days of the lifting of the state of emergency. The electronically filed documents are a true

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representation of the original documents to be filed with the Commission. Thank you for your attention to this matter.

Sincerely,

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JOE F. CHILDERS