

Kentucky Power Company
KPSC Case No. 2021-00004
Commission Staff's Second Set of Data Requests
Dated April 19, 2021

DATA REQUEST

KPSC 2_1 Refer to Kentucky Power's response to Staff's First Request for Information(Staff's First Request), Item 6c, Attachment 1. Because the Mitchell Units appear to have energy market bid prices less than the PJM LMP infrequently, explain which PJM services the Mitchell units provided to PJM and for which PJM revenues were received for the years 2018, 2019, 2020.

RESPONSE

In addition to energy revenues, Mitchell provides certain ancillary services in the PJM market. See KPCO_R_KPSC_2_1_Attachment1 for those revenues.

Mitchell also serves as a capacity resource in PJM for Kentucky Power, which allows Kentucky Power to satisfy its reserve margin obligations and to avoid capacity purchases.

Witness: Mark A. Becker

Witness: Jason M. Stegall

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- b. See the Company's response to item a. The PCA provides Kentucky Power with the ability to combine capacity resources with other PCA member companies to meet a PJM capacity obligation, but it has no role in relation to any interactions in the PJM energy market.

Witness: Mark A. Becker

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DATA REQUEST

KPSC 2_3 State whether the impact of either compliance with Effluent Limitation Guidelines (ELG) and Coal Combustion Residual (CCR) rules or a 2028 retirement of the Mitchell Power Plant was considered or discussed jointly between Kentucky Power and Appalachian Power Company.

- a. If yes, describe in detail the contents of these discussions and identify the individuals involved.
- b. If no, explain why Appalachian Power Company and Kentucky Power did not communicate regarding these matters.
- c. State whether these considerations influenced Kentucky Power's decision making regarding compliance with CCR and ELG requirements at the Mitchell Power Plant.
- d. Explain whether these considerations influenced Kentucky Power's decision making regarding compliance with CCR and ELG requirements.

RESPONSE

Yes.

- a. Attorney-client privileged discussions were held between Kentucky Power and Appalachian Power regarding the impact of compliance with the CCR and ELG rules at Mitchell Plant and the separate filings Kentucky Power and Appalachian Power in their respective jurisdictions for approval to install equipment to comply with those rules. Those discussions were high-level in nature concerning the compliance requirements and comparing and contrasting the planned filings in each jurisdiction. Please see KPCO_R_KPSC_2_3_Attachment1 for a listing of attendees.
- b. See the Company's response to part a.
- c. The Company's communications with Appalachian Power did not affect Kentucky Power's decision making regarding CCR and ELG compliance at Mitchell Plant. The Company's filing stands on its own from the filing made in West Virginia by Wheeling Power Company.
- d. See the Company's response to part c.

Witness: D. Brett Mattison

Name:

Title:

Jennifer Frederick

Regulatory Case Manager

Christen Blend

Senior Counsel

Tanner Wolfram

Counsel

Gary Spitznogle

VP Environmental Services

Bill Mast

Director - Projects

Brian West

VP Regulatory & Finance

Annette Richardson

Director Regulatory Case Management

Bill Allen

SVP Corporate Planning & Budgeting

Eric Wittine

Director Regulatory Strategy

Brian Rupp

Regulatory Case Manager

James Bacha

Associate General Counsel

Hector Garcia-Santana

Senior Counsel

Kathy Milenkovski

Associate General Counsel

John Scalzo

VP Regulatory & Finance

Cindy Wiseman

VP External Affairs & Customer Services

Matt Satterwhite

VP Regulatory Services

VERIFICATION

The undersigned, Mark A. Becker, being duly sworn, deposes and says he is a Managing Director of Resource Planning for American Electric Power Service Corporation, that he has personal knowledge of the matters set forth in the forgoing responses, and the information contained therein is true and correct to the best of his information, knowledge and belief after reasonable inquiry.

Mark A Becker
Signed on 2021/05/03 09:35:56 -8:00

Mark A. Becker

STATE OF OHIO

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) Case No. 2021-00004

COUNTY OF FRANKLIN

)

Subscribed and sworn to before me, a Notary Public in and before said County and State, by Mark A. Becker, this 3rd day of May, 2021.



S Smithisler
Signed on 2021/05/03 09:35:56 -8:00

Notary Public

Notary ID Number: 2019-RE-775042

ABE58099-C01C-4B83-969E-1F9ABB622D8 --- 2021/05/03 09:14:38 -8:00 --- Remote Notary



VERIFICATION

The undersigned, Brett Mattison, being duly sworn, deposes and says he is the President and Chief Operating Officer of Kentucky Power Company, that he has personal knowledge of the matters set forth in the forgoing responses, and the information contained therein is true and correct to the best of his information, knowledge and belief after reasonable inquiry.

Brett Mattison
Signed on 2021/05/03 09:53:29 -8:00

Brett Mattison

STATE OF OHIO

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) Case No. 2021-00004

COUNTY OF FRANKLIN

)

Subscribed and sworn to before me, a Notary Public in and before said County and State, by
Brett Mattison, this 3rd day of May, 2021.



S. Smithhisler
Signed on 2021/05/03 09:53:29 -8:00

Notary Public

Notary ID Number: 2019-RE-775042

EA36C8AD-B916-48A7-B9CC-8370B65DBFFD --- 2021/05/03 09:18:05 -8:00 --- Remote Notary



VERIFICATION

The undersigned, Jason M. Stegall, being duly sworn, deposes and says he is a Regulatory Pricing & Analysis Manager for American Electric Power Service Corporation, that he has personal knowledge of the matters set forth in the forgoing responses, and the information contained therein is true and correct to the best of his information, knowledge and belief after reasonable inquiry.


Signed on 2021/05/03 09:56:51 -8:00

Jason M. Stegall

STATE OF OHIO

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) Case No. 2021-00004

COUNTY OF FRANKLIN

)

Subscribed and sworn to before me, a Notary Public in and before said County and State, by
Jason M. Stegall, this 3rd day of May, 2021.




Signed on 2021/05/03 09:56:51 -8:00

Notary Public

Notary ID Number: 2019-RE-775042

D9A443CD-F990-47C0-9FB3-82942B64D6FD --- 2021/05/03 09:20:36 -8:00 --- Remote Notary

