

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

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

JOINT INITIAL DATA REQUESTS OF KIUC AND THE ATTORNEY GENERAL

The Attorney General of the Commonwealth of Kentucky, through his Office of Rate Intervention (“Attorney General”), and Kentucky Industrial Utility Customers (“KIUC”) submit these Data Requests to Kentucky Power Company (hereinafter “Kentucky Power” or the “Company”) to be answered by March 12, 2021 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 requested 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.
- (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, please request clarification directly from undersigned Counsel for the Office of Attorney General and KIUC.

(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, please 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 and KIUC as soon as possible, and in accordance with Commission direction.

(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, please 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 J. CAMERON
ATTORNEY GENERAL



J. MICHAEL WEST
LAWRENCE W. COOK
JOHN G. HORNE II
ANGELA M. GOAD
ASSISTANT ATTORNEYS GENERAL
700 CAPITAL AVE, SUITE 20
FRANKFORT, KY 40601-8204
PHONE: (502) 696-5433
FAX: (502) 573-1005
Michael.West@ky.gov
Larry.Cook@ky.gov
John.Horne@ky.gov
Angela.Goad@ky.gov

/s/ Michael L. Kurtz
Michael L. Kurtz, Esq.
Kurt J. Boehm, Esq.
Jody Kyler Cohn, Esq.
BOEHM, KURTZ & LOWRY
36 East Seventh Street, Suite 1510
Cincinnati, Ohio 45202
Ph: 513.421.2255 fax: 513.421.2764
mkurtz@bkllawfirm.com
kboehm@BKLawfirm.com
jkylercohn@BKLawfirm.com

Certificate of Service and Filing

Pursuant to the Commission's Order dated March 17, 2020 in Case No. 2020-00085, and in accord with all other applicable law, Counsel certifies that, on March 10, 2021, an electronic copy of the forgoing was served by e-mail to the following. A physical copy of the filing will be submitted to the Commission once the State of Emergency has ceased.

Mark R. Overstreet
Katie M. Glass
moverstreet@stites.com
kglass@stites.com

Christen M. Blend
Jennifer J. Fredrick
Tanner Wolfram
cblend@aep.com
jfredrick@aep.com
tswolfram@aep.com

Matthew E. Miller
Joe F. Childers
matthew.miller@sierraclub.org
joe@jchilderslaw.com

this 10th day of March 2021.



Assistant Attorney General

ELECTRONIC APPLICATION OF KENTUCKY POWER COMPANY FOR APPROVAL OF A CERTIFICATE OF PUBLIC CONVENIENCE AND NECESSITY FOR ENVIRONMENTAL PROJECT CONSTRUCTION AT THE MITCHELL GENERATING STATION, AN AMENDED ENVIRONMENTAL COMPLIANCE PLAN, AND REVISED ENVIRONMENTAL SURCHARGE TARIFF SHEETS

First Set of Data Requests

1. Identify the date (by month and year) by which the Company will be fully compensated for the costs related to the proposed CCR and ELG compliance projects proposed in this case and ratepayers will no longer pay a surcharge (or any other charge) related to these costs if the Company's proposal is approved.
 - a. Specifically, will the monthly bill impact for an "average" residential customer using 1219 kWh per month be reduced to \$0.00 after the conclusion of Period 4 in March of 2025? See Testimony of Scott at 6-11.
 - b. Provide a detailed, month-by-month analysis of the overall bill impact to a residential customer using 1219 kWh per month for each month through December, 2040. Include an analysis for at least one residential customer using more energy and one using less over that same time frame. Perform a similar analysis for other ratepayers, including an "average" small business.
2. Please provide all work papers, in electronic spreadsheet format with formulas intact, where available, supporting each of the figures, tables, and exhibits accompanying the Companies' filing and supporting testimony.
3. Identify and detail all expenditures related to the proposed ELG and CCR compliance projects including responses to RFP's for each improvement and associated costs. Further, identify the annual maintenance and operating costs for all new equipment related to CCR and ELG compliance at issue.
4. Identify the type of coal burned at the Mitchell Generating Station and discuss whether the type of coal to be burned is anticipated to change over time. Further, identify the source of the coal currently burned.
5. For years 2016-2020, please answer the following.
 - a. How many tons of coal burned in the Mitchell Generating Station were mined in Kentucky? Please identify the Kentucky mines where the coal was sourced.
 - b. How many tons of coal burned in the Mitchell Generating Station were mined in West Virginia? Please identify the West Virginia mines where the coal was sourced.
 - c. How many tons of coal burned in the Mitchell Generating Station were mined outside of Kentucky and West Virginia? Please identify the mines where this coal was sourced.
6. For each amount identified in response to 5(a) through 5(c), provide the share allocated to Kentucky Power.
7. For years 2016-2020, please identify how many full-time workers at the Mitchell Plant were citizens of Kentucky, West Virginia and Ohio.

ELECTRONIC APPLICATION OF KENTUCKY POWER COMPANY FOR APPROVAL OF A CERTIFICATE OF PUBLIC CONVENIENCE AND NECESSITY FOR ENVIRONMENTAL PROJECT CONSTRUCTION AT THE MITCHELL GENERATING STATION, AN AMENDED ENVIRONMENTAL COMPLIANCE PLAN, AND REVISED ENVIRONMENTAL SURCHARGE TARIFF SHEETS

8. For years 2016-2020, please identify the average total compensation package (salary plus all benefits) for the full-time workers at Mitchell.
9. For years 2016-2020, please identify how many on-site contractors at the Mitchell Plant were citizens of Kentucky, West Virginia and Ohio. To the best of Kentucky Power's knowledge, how much were these on-site workers paid on average (salary plus all benefits).
10. For years 2016-2020, please identify the amount of property tax paid by Kentucky Power to the state of West Virginia or any political subdivision in West Virginia.
11. For years 2016-2020, please identify all other taxes paid by Kentucky Power to the state of West Virginia or any political subdivision in West Virginia.
12. Provide a detailed analysis of the potential replacement generating options if the CCR and ELG proposals at issue here are denied, including cost projections and rate impacts.
13. Provide remaining storage volumes and associated timelines for CCR at the impoundments/landfills utilized for the operation of the Mitchell Generating Station.
14. Provide the Mitchell Generating Station's Net Capacity Factor over the past five years. Compare that net capacity factor to the modeled or assumed factors of other potential replacement resources.
15. Discuss the Mitchell Generating Station's value as a capacity resource.
16. Discuss whether the Mitchell Generating Station provides a valuable resource for Kentucky Power with respect to providing reliable service to its customers and whether potential replacement sources could negatively impact the reliability of Kentucky Power's service to its customers.
17. Discuss whether the Mitchell Generating Station could be converted to a Natural Gas Generating Unit and identify the total cost for such a conversion, including costs related to pipeline construction.
18. Confirm that the Company intends to depreciate the value of the CCR and ELG investments at issue here through an expected retirement date of 2040 for the Mitchell Generating Station.
19. Discuss whether the expected retirement date of 2040 has changed over time, the reasons for any changes, and provide a detailed history of any changes to that retirement date, including but not limited to identification of alternate retirement dates in other proceedings before the Kentucky Commission or to agencies of other states or the federal government.
20. Identify all employees of the Mitchell Generating Station and identify whether those individuals are residents of the Commonwealth of Kentucky.
21. Identify all tax receipts of the Commonwealth of Kentucky (or a political subdivision thereof) derived directly or indirectly from the operation of the Mitchell Generating Station.

ELECTRONIC APPLICATION OF KENTUCKY POWER COMPANY FOR APPROVAL OF A CERTIFICATE OF PUBLIC CONVENIENCE AND NECESSITY FOR ENVIRONMENTAL PROJECT CONSTRUCTION AT THE MITCHELL GENERATING STATION, AN AMENDED ENVIRONMENTAL COMPLIANCE PLAN, AND REVISED ENVIRONMENTAL SURCHARGE TARIFF SHEETS

22. Confirm that 50% of the Mitchell Generating Station is owned by Wheeling Power.
23. Identify all the filings by Wheeling Power currently active before the West Virginia Public Service Commission concerning the Mitchell Generating Station.
 - a. Provide the filing date, case caption, and docket number.
 - b. Describe subject matter.
 - c. Describe how the decision in the case could impact the Mitchell Generating Station.
24. Identify and describe any anticipated filings by Wheeling Power before the West Virginia Public Service Commission concerning the Mitchell Generating Station.
25. Explain why a 9.10 ROE in this proceeding is fair and reasonable and why the Commission should not determine an alternate ROE.
26. Explain whether the Company's analysis of the benefits/costs included: (i) the potential imposition of a nation-wide carbon tax; (ii) footprint-wide carbon pricing in PJM; (iii) securitization of the remaining net book value of the Mitchell units; and (iv) natural gas firing of the Mitchell units.
27. Provide the gross plant in service, accumulated depreciation, ADIT, fuel inventory, M&S inventory, and each other balance sheet amount for each Mitchell unit at December 31, 2020 and rolled forward for each subsequent year through 2028 assuming the units are retired that year and rolled forward for each subsequent year through 2040 assuming the units are retired in that year. Provide the amounts separately for costs included in the base and environmental surcharge revenue requirements and in total.
28. Provide the annual depreciation expense, non-fuel O&M (variable and fixed) expense, and each other identifiable expense, including A&G expense, for each Mitchell unit through 2028 assuming the units are retired that year and rolled forward for each subsequent year through 2040 assuming the units are retired in that year. Provide the amounts separately for costs included in the base and environmental surcharge revenue requirements and in total.
29. Provide a copy of all economic analyses related to the scope of the CPCN and remaining lives of the Mitchell units performed by or on behalf of the Company in live Excel format with all formulas intact for each Portfolio evaluated, including all analyses reflected in Exhibit MAB-1 attached to Mr. Becker's Direct Testimony and all supporting analyses and workpapers in the same format. The response should include, but is not limited to:
 - a. The annual nominal and levelized revenue requirements for each case or portfolio evaluated.
 - b. Provide the assumptions and other inputs into Plexos, including those necessary to quantify variable expenses and fixed expenses.

ELECTRONIC APPLICATION OF KENTUCKY POWER COMPANY FOR APPROVAL OF A CERTIFICATE OF PUBLIC CONVENIENCE AND NECESSITY FOR ENVIRONMENTAL PROJECT CONSTRUCTION AT THE MITCHELL GENERATING STATION, AN AMENDED ENVIRONMENTAL COMPLIANCE PLAN, AND REVISED ENVIRONMENTAL SURCHARGE TARIFF SHEETS

- c. Provide the output annual reports from Plexos, including the annual costs by type (fuel, emissions, other variable non-fuel O&M, fixed non-fuel O&M, PPA, etc.) for each resource and in total.
 - d. Provide the derivation of the capital costs for each new resource considered for selection by the Company, including the capital spend curve, and calculation of AFUDC. Provide a copy of the source documents relied on for the capital costs, including, but not limited to, any forecast escalation/de-escalation of capital costs based on those estimates.
 - e. Provide the derivation of levelized fixed charge rates for each new resource considered for selection by the Company, including, but not limited to, cost of capital (including capital structure and component costs), service life and depreciation rate(s), tax life and method, ITC, insurance rates, property tax rates, and all other assumptions and factors used in the calculations.
 - f. Provide the annual nominal and levelized revenue requirements for each case by type of cost, showing the outputs for each such cost from Plexos, calculations of each of the capital related costs, fixed O&M, and each other separately identifiable cost.
29. Provide a schedule showing the Company's annual load and resources under Case 1 and Case 2. In addition, provide a narrative describing each new resource that is added during the study period, including, but not limited to, the timing of the addition, nameplate capacity, capacity value at peak under PJM standards, and indicate whether the resource is acquired via ownership or PPA.
30. Provide a copy of all internal correspondence related to the economic analyses, including, but not limited to, the assumptions selected, data inputs, and the results, including the decision to proceed with the CCR and ELG case for purposes of the CPCN.
31. Refer to the Direct Testimony of Leah Scott. Confirm that her calculations of the revenue requirement for Cases 1 and 2 are limited to the environmental surcharge and do not include the base or any other revenue requirements, such as the FAC, for new resources to replace the Mitchell capacity and energy or the additional transmission investment that may or will be required.
32. Refer to the Direct Testimony of Heather Whitney at 6 wherein she describes the Company's proposed depreciation rates for Project 22 under Case 1 and Case 2.
 - a. Confirm that these depreciation rates are not the same depreciation rates authorized and approved for Mitchell by the Commission in Case No. 2017-00179. If confirmed, then provide the depreciation rates authorized and approved for Mitchell in Case No. 2017-00179.
 - b. Indicate if this is the first time the Company has proposed differentiated depreciation rates for any generating unit that has costs included in base rates and separate costs

ELECTRONIC APPLICATION OF KENTUCKY POWER COMPANY FOR APPROVAL OF A CERTIFICATE OF PUBLIC CONVENIENCE AND NECESSITY FOR ENVIRONMENTAL PROJECT CONSTRUCTION AT THE MITCHELL GENERATING STATION, AN AMENDED ENVIRONMENTAL COMPLIANCE PLAN, AND REVISED ENVIRONMENTAL SURCHARGE TARIFF SHEETS

included in the environmental surcharge. If this is not the first time, then identify the prior proceedings(s) by case number, describe each such prior proposal, and indicate if the proposed differentiated rates for the environmental surcharge were approved by the Commission.