

**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 At The Mitchell Generating Station, An)	Case No. 2021-00004
Amended Environmental Compliance Plan, And)	
Revised Environmental Surcharge Tariff Sheets)	

Kentucky Power Company’s Data Requests to the Office of the Attorney General of the Commonwealth of Kentucky and Kentucky Industrial Utility Customers, Inc.

Pursuant to the Commission’s Orders dated February 12, 2021 and March 10, 2021, Kentucky Power Company propounds the following data requests to be answered by the Office of the Attorney General of the Commonwealth of Kentucky and Kentucky Industrial Utility Customers, Inc.:

DEFINITIONS

- “Document” means the original and all copies (regardless of origin and whether or not including additional writing thereon or attached thereto) of memoranda, reports, books, manuals, instructions, directives, records, forms, notes, letters, notices, confirmations, telegrams, pamphlets, notations of any sort concerning conversations, telephone calls, meetings or other communications, bulletins, transcripts, diaries, analyses, summaries, correspondence investigations, questionnaires, surveys, worksheets, and all drafts, preliminary versions, alterations, modifications, revisions, changes, amendments and written comments concerning the foregoing, in whatever form, stored or contained in or on whatever medium, including computerized memory or magnetic media.

- “Study” means any written, recorded, transcribed, taped, filmed, or graphic matter, however produced or reproduced, either formally or informally, a particular issue or situation, in whatever detail, whether or not the consideration of the issue or situation is in a preliminary stage, and whether or not the consideration was discontinued prior to completion.

- “Person” means any natural person, corporation, professional corporation, partnership, association, joint venture, proprietorship, firm, or the other business enterprise or legal entity.
- A request to identify a natural person means to state his or her full name and residence address, his or her present last known position and business affiliation at the time in question.
- A request to identify a document means to state the date or dates, author or originator, subject matter, all addressees and recipients, type of document (e.g., letter, memorandum, telegram, chart, etc.), number or code number thereof or other means of identifying it, and its present location and custodian. If any such document was, but is no longer in the Attorney General’s possession or subject to its control, state what disposition was made of it.
- A request to identify a person other than a natural person means to state its full name, the address of its principal office, and the type of entity.
- “Identify” used in a fashion other than as described above means to provide in detail, including all assumptions, bases, facts considered, and rationale if not called for in another part of the data request, the requested information.
- “And” and “or” should be considered to be both conjunctive and disjunctive, unless specifically stated otherwise.
- “Each” and “any” should be considered to be both singular and plural, unless specifically stated otherwise.
- Words in the past tense should be considered to include the present, and words in the present tense include the past, unless specifically stated otherwise.
- “You” or “your” means the person whose filed testimony is the subject of these interrogatories and, to the extent relevant and necessary to provide full and complete answers to any request, “you” or “your” may be deemed to include any person with information relevant to any interrogatory who is or was employed by or otherwise associated with the witness or who assisted, in any way, in the preparation of the witness’ testimony.
- “PJM” means PJM Interconnection.
- “Company” means Kentucky Power Company.
- “AEP” means American Electric Power Company, Inc.
- “Wheeling Power” means Wheeling Power Company.

INSTRUCTIONS

1. If any matter is evidenced by, referenced to, reflected by, represented by, or recorded in any document, please identify and produce for discovery and inspection each such document.
2. These interrogatories are continuing in nature, and, without regard to the date created or obtained, information which the responding party later becomes aware of, or has access to, and which is responsive to any request is to be made available to Kentucky Power. Any studies, evaluations, analyses, documents, or other subject matter not yet completed that will be relied upon during the course of this case should be so identified and provided as soon as they are completed. The respondent is obliged to change, supplement and correct all answers to interrogatories to conform to available information, including such information as it first becomes available to the respondent after the answers hereto are served.
3. Unless otherwise expressly provided, each interrogatory should be construed independently and not with reference to any other interrogatory herein for purpose of limitation.
4. The answers provided should first restate the question asked and also identify the person(s) supplying the information.
5. Please answer each designated part of each information request separately. If you do not have complete information with respect to any interrogatory, so state and give as much information as you do have with respect to the matter inquired about, and identify each person whom you believe may have additional information with respect thereto.
6. In the case of multiple witnesses, each interrogatory should be considered to apply to each witness who will testify to the information requested. Where copies of testimony, transcripts or depositions are requested, each witness should respond individually to the information request.
7. The interrogatories are to be answered under oath by the witness(es) responsible for the answer.
8. Please furnish any non-disclosure or other required for disclosure of any information or response for which confidential treatment provided.

DATA REQUESTS

1. Please provide all supporting documents and work papers in machine readable format, with cells unlocked and formulas intact, that were used in the preparation of testimony of Lane Kollen, including all charts and tables, and further including any supplemental testimony, filed by the Office of the Attorney General of the Commonwealth of Kentucky and Kentucky Industrial Utility Customers Inc.
2. Please refer to page 16 lines 2 through 5 of Mr. Kollen's May 12, 2021 testimony. Please provide all calculations, in machine readable format, with cells unlocked and formulas intact, relied on in connection with Mr. Kollen's testimony that "the savings in Case 1 (with carbon) are overstated by \$20 million on a nominal dollar basis and \$8 million on a present value basis compared to Case 2."
3. Please refer to Mr. Kollen's May 12, 2021 testimony at page 26. Please provide all facts supporting Mr. Kollen's choice, and the reasonableness, of "an estimated cost of 3%" on the "equivalent amount of securitization debt issued by a Special Purpose Entity ('SPE')."
4. Please refer to the statement appearing at page 21, lines 9-11 of Mr. Kollen's testimony: "The 0% assumption [for projects that go into service after 2024] was incorrect even under prior tax law." Please provide all evidence supporting the statement, including references to the applicable provisions of the United States Code.
5. Please refer to page 14, lines 17-18, and page 15, lines 1-6 of Mr. Kollen's testimony regarding the pricing for the Louisville Gas and Electric Company and Kentucky Utilities Company ("LG&E/KU") solar PPA ("LG&E/KU Solar PPA").
 - a. Please provide a complete and unredacted copy of the LG&E/KU Solar PPA.
 - b. Please provide the following information regarding the LG&E/KU Solar PPA:
 - (i) the nominal capacity amount to be provided under the LG&E/KU Solar PPA;
 - (ii) the commercial operation date for the facilities providing the energy supplied by the LG&E/KU Solar PPA; and
 - (iii) the start and end date of the LG&E/KU Solar PPA. If the start or end date is not known please provide the term of the LG&E/KU Solar PPA in years.

- c. Please state the total number of the individual PPA proposals received by LG&E/KU in response to any request for proposals (“RFP”) issued by LG&E/KU that resulted in the LG&E/KU Solar PPA.
 - d. For each solar PPA response to the LG&E/KU RFP described in subpart (c) that did not result in the LG&E/KU Solar PPA please provide the following information:
 - (i) the levelized energy price (stated in \$/MWh) to be paid by LG&E/KU;
 - (ii) the nominal capacity amount to be provided under each proposed PPA in response to the RFP;
 - (iii) the commercial operation date for the facilities providing the energy supplied by each proposed PPA submitted in response to the LG&E/KU RFP described above; and
 - (iv) the beginning and end dates, or term in years if the beginning and end dates are not known, of each proposed PPA submitted in response to the LG&E/KU RFP described above.
6. Please refer to page 14, lines 17-18, and page 15, lines 1-6 of Mr. Kollen’s testimony regarding the three Big Rivers Electric Corporation (“Big Rivers”) solar PPAs (“Big Rivers Solar PPAs”).
- a. Please provide complete and unredacted copies of the three Big Rivers Solar PPAs referenced by Mr. Kollen in his testimony
 - b. For each of the three Big Rivers Solar PPAs please provide the following information:
 - (i) the nominal capacity amount to be provided under each of the three Big Rivers Solar PPAs;
 - (ii) the commercial operation date for the facilities providing the energy supplied by each of the three Big Rivers Solar PPAs.
 - c. Please state the number of the individual PPA proposals received by Big Rivers in response to the request for proposals (“RFP”) described by Big Rivers in its application in Case No. 2020-00183. For each such PPA proposal received by Big Rivers in response to the RFP that did not result in the three Big Rivers Solar PPAs please provide the following information:
 - (i) the levelized energy price (stated in \$/MWh) to be paid by Big Rivers;

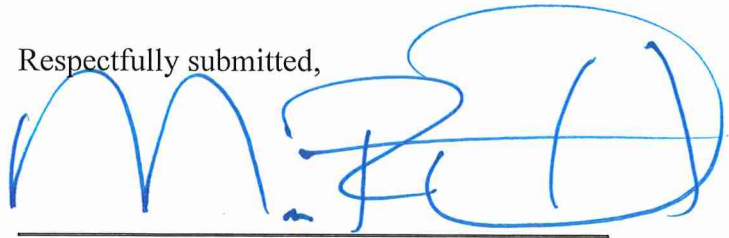
(ii) the nominal capacity amount to be provided under each proposed PPA in response to the Big Rivers RFP;

(iii) the commercial operation date for the facilities providing the energy supplied by each proposed PPA submitted in response to the Big Rivers RFP; and

(iv) the beginning and end dates, or term in years if the beginning and end dates are not known, of each proposed PPA submitted in response to the Big Rivers RFP.

7. Please refer to Mr. Kollen's testimony at page 19, lines 16 through 20 and page 20, lines 1 through 17.
- a. Please describe the federal tax treatment of the remaining tax basis in Mitchell at retirement, assuming the remaining unrecovered book value at the time (*i.e.*, stranded cost) is reclassified into a regulatory asset to be fully recovered in customer rates over some period of time.
 - b. Confirm that an abandonment loss would *not* occur for tax purposes if the situation described in subpart (a) above occurred, and the retirement date tax basis for the plant becomes the tax basis for the new regulatory asset? .
 - c. If the response to subpart (b) is anything other than an unconditional confirmation please explain in detail the full basis for the response, including relevant citations to the United States Code, Revenue Rulings by the Internal Revenue Service, decisions of the United States Tax Court or other federal courts, other judicial precedent, and decisions of the Public Service Commission of Kentucky.

Respectfully submitted,



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