

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

In the Matter of:

Electronic Investigation of the	)	
Service, Rates and Facilities of	)	Case No. 2021-00370
Kentucky Power Company	)	

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

Pursuant to the Commission’s Order dated December 1, 2023, Kentucky Power Company propounds the following data requests to be answered by the Attorney General of the Commonwealth of Kentucky and Kentucky Industrial Utility Customers, Inc. (“AG-KIUC”):

**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, text messages, 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 AG-KIUC'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.
- "Attorney General" means the Attorney General of the Commonwealth of Kentucky, his employees, and his agents, including the Attorney General's Office of Rate Intervention and Lane Kollen.
- "KIUC" means Kentucky Industrial Utility Customers, Inc., its employees, and its agents, including Lane Kollen.
- "PJM" means PJM Interconnection.
- "Company" means Kentucky Power Company.
- "AEP" means American Electric Power Company, Inc.

## **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 schedules, tables, and charts included in the testimony and exhibits to the testimony of Lane Kollen in electronic format, with formulas intact and visible, and no pasted values.
2. Please provide all workpapers, source documents, and electronic spreadsheets used in the development of the testimony of Lane Kollen. The requested information, if so available, should be provided in an electronic format, with formulas intact and visible, and no pasted values.
3. Please state whether it is the position of the Attorney General that Kentucky Power has failed to render adequate, efficient, or reasonable service.
4. Please state whether it is the position of KIUC that Kentucky Power has failed to render adequate, efficient, or reasonable service.
5. Please state whether it is the position of the Attorney General that Kentucky Power should own or contract for generation resources sufficient to meet its customers' maximum estimated requirements instead of Kentucky Power's historical and current strategy of relying on its membership in the PJM Interconnection to do so.
6. Please state whether it is the position of KIUC that Kentucky Power should own or contract for generation resources sufficient to meet its customers' maximum estimated requirements instead of Kentucky Power's historical and current strategy of relying on its membership in the PJM Interconnection to do so.
7. Please refer to page 7, line 1, of Lane Kollen's testimony. Please identify and provide copies of all studies, documents, or other information that Lane Kollen reviewed to support his conclusion that Kentucky Power "historically has underinvested in its distribution system."
8. To the extent Lane Kollen relied on the Commission's Final Order in Case No. 2021-00481 and its reliance on Liberty Utility Co.'s due diligence materials to support his conclusion that Kentucky Power "historically has underinvested in its distribution system," please confirm whether Lane Kollen reviewed Liberty Utility Co.'s due diligence materials.
9. To the extent Lane Kollen relied on the Commission's Final Order in Case No. 2021-00481 and its reliance on Liberty Utility Co.'s due diligence materials to support his conclusion that Kentucky Power "historically has underinvested in its distribution system," please confirm that Liberty Utility Co.'s due diligence materials were confidential and unavailable for review by Kentucky Power.
10. Please refer to the table on page 8 of Lane Kollen's testimony. Please confirm that a generating unit's capacity factor is calculated as the ratio of the actual energy produced by the generating unit to the maximum amount of energy that can be produced by the generating unit.

11. Please refer to the table on page 8 of Lane Kollen's testimony. Please confirm that when a generating unit does not operate because it would be uneconomic to do so, such failure to operate would reduce the unit's capacity factor.
12. Please refer to the table on page 8 of Lane Kollen's testimony. For each of the Spurlock generating units, please provide the following hourly information for 2018-2022 including the source of such information. If not available at an hourly scale, provide at the most temporally granular scale available.
  - a. Price (\$/MWh) of offers submitted into the PJM energy market.
  - b. Quantity (MW) of offers submitted into the PJM energy market.
  - c. For each offer, whether that offer was accepted by PJM.
  - d. Day-ahead generator commitment status, including economic dispatch, self-schedule (must-run), self-schedule (must-run) at minimum operating level and dispatch economic above, emergency, unavailable (outage), or other recorded purpose.
  - e. Real-time generator commitment status, including economic dispatch, self-schedule (must-run), emergency, unavailable (outage), or other recorded purpose.
  - f. Locational marginal price received (\$/MWh).
  - g. Economic minimum level (MW).
13. Please refer to the table on page 8 of Lane Kollen's testimony. Please confirm that East Kentucky Power Cooperative ("EKPC") commits the Spurlock Station coal fired units as self schedule (must run) status in the PJM energy market.
14. Please refer to page 11 of Lane Kollen's testimony. Please confirm that the Commission's Final Order in Case No. 2021-004211 states that December 31, 2028 is the "date when Kentucky Power's interest in Mitchell must terminate in accordance with the July 15, 2021 Order in Case No. 2021-00004."
15. Please refer to pages 13 and 14 of Lane Kollen's testimony regarding a joining of the Company with EKPC. Please provide all studies, documents, or other information that Lane Kollen reviewed to support his testimony that such joining would be feasible.
16. Please refer to pages 13 and 14 of Lane Kollen's testimony regarding a joining of the Company with EKPC. Please identify and provide copies of all documents relating to any communication between the Attorney General and EKPC regarding the potential joining of the Company with EKPC.
17. Please refer to pages 13 and 14 of Lane Kollen's testimony regarding a joining of the Company with EKPC. Please identify and provide copies of all documents relating to any

communication between KIUC and EKPC regarding the potential joining of the Company with EKPC.

Respectfully submitted,



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