

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

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| ELECTRONIC INVESTIGATION |) | |
| OF THE SERVICE, RATES AND |) | Case No. 2021-00370 |
| FACILITIES OF KENTUCKY POWER |) | |
| COMPANY |) | |

INITIAL DATA REQUESTS OF THE ATTORNEY GENERAL AND KIUC

Come now the intervenors, the Attorney General of the Commonwealth of Kentucky, by his Office of Rate Intervention (“Attorney General”) and Kentucky Industrial Utility Customers (“KIUC”), and submit these Data Requests to Kentucky Power Company (hereinafter “Kentucky Power” or “company”) to be answered by November 9, 2023, 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 companies receive or generate 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.

(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 undersigned Counsel 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



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Certificate of Service and Filing

Pursuant to the Commission's Orders and in accord with all other applicable law, Counsel certifies that, on October 16, 2023, an electronic copy of the foregoing was served via the Commission's electronic filing system.

this 16th day of October, 2023.

A handwritten signature in blue ink, appearing to read "J. Michael New". The signature is written in a cursive style with a horizontal line extending to the right.

Assistant Attorney General

Data Requests

1. In its Order dated June 23, 2023 in this proceeding, the Commission stated:

“It is clear to the Commission from the records of Case Nos. 2022 00283 and 2023-00145 that Kentucky Power does not have sufficient capacity available to serve customers' energy needs, has been aware of that shortcoming for a significant amount of time, understands the detriment that insufficiency can cause customers, has described the speed and ease by which it could fix that shortcoming, and yet has chosen not to address its inadequacy of service.”

- a. Provide all evidence that the Company had sufficient capacity and energy from owned and/or contract purchased capacity and energy, as opposed to as-available market priced energy, after the expiration of the Rockport UPA in December 2022 necessary to meet its load requirements, including the effects of extreme weather.
 - b. Provide a copy of all analyses, studies, reports, and correspondence developed by or on behalf of the Company prior to the expiration of the Rockport UPA that addressed the Company's capacity and energy requirements, the alternatives considered to meet those requirements, the risk exposures of inadequate and/or insufficient owned or contract purchased capacity and energy and the cost of purchasing as-available energy.
 - c. Provide a narrative description of the Company's decision making process and the decision(s) made not to acquire additional capacity whether owned or under contract after the termination of the Rockport UPA, including energy attributes of the capacity. Provide all supporting evidence relied on for the decision(s) that were made, including, but not limited to, the decision that the resources owned and under contract were adequate and sufficient to meet the Company's capacity and energy requirements and manage and mitigate the risk exposures of inadequate and/or insufficient owned or contract purchased capacity and energy and the cost of purchasing as-available energy.
2. Explain why the Mitchell units did not operate at 100% capacity factor during Winter Storm Elliott. To the extent the units were not physically available to

operate at 100% capacity factor, describe all limitations and the reasons for each such limitation. Provide a copy of all maintenance reports, root cause analysis, and all other analyses that address specifically why the Mitchell units could not and were not operated at 100% capacity factor during Winter Storm Elliott.

3. Describe in detail the planned maintenance outage for Big Sandy 1 in December 2022, including the scheduled start and end dates, the reasons for scheduling the outage at that time, planned work to be performed, and the specific reason(s) why the planned outage was not completed as scheduled. Provide a copy of all maintenance reports, outage post-mortem analyses, root cause analyses, and all other analyses that address why Big Sandy 1 was unavailable during Winter Storm Elliott.