

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

In The Matter Of:

ELECTRONIC JOINT APPLICATION OF AMERICAN)	
ELECTRIC POWER COMPANY, INC., KENTUCKY)	
POWER COMPANY AND LIBERTY UTILITIES CO.)	Case No.
FOR APPROVAL OF THE TRANSFER OF OWNERSHIP)	2021-00481
AND CONTROL OF KENTUCKY POWER COMPANY)	

**LS Power Development, LLC’s
Post-hearing Request for Information to Joint Applicant, Liberty Utilities Co.**

LS Power Development, LLC (“LS Power”) does hereby submit its Post-hearing Request for Information to Joint Applicant, Liberty Utilities, Co. (“Liberty”). By Order of the Commission the information requested is due no later than April 8, 2022. Each response shall include the question to which the response is made and shall include the name of the witness responsible for responding to the question. Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association or a governmental agency, be accompanied by a signed certification of the preparer or the 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.

For any request to which Liberty fails or refuses to furnish all or part of the requested information, Liberty shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

LS Power’s requests to Liberty are as follows:

1. If the Commission were to approve the Joint Applicants' underlying transfer of control request, but condition such approval on a requirement that Liberty would not seek a general increase of Kentucky Power's retail rates to be effective any earlier than January 1, 2026, state whether Liberty would agree to such condition.

2. If the Commission were to approve the Joint Applicants' underlying transfer of control request, but condition such approval on a requirement that should Liberty ever seek and obtain approval for Kentucky Power's withdrawal from PJM Interconnection, L.L.C., Liberty would hold Kentucky Power's customers harmless from any and all costs associated with such withdrawal, state whether Liberty would agree to such condition.

This 31st day of March, 2022.

Respectfully Submitted,



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CERTIFICATE OF SERVICE

This is to certify that the foregoing copy of **LS Power Development, LLC's Post-hearing Request for Information** is being electronically transmitted to the Commission on March 31, 2022; and, that there are currently no parties that the Commission has excused from participation by electronic means in this proceeding; and pursuant to the Commission's July 22, 2021 Order in Case No. 2020-00085, no paper copies of the filing will be made.



Mark David Goss