

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.)
FOR APPROVAL OF THE TRANSFER OF OWNERSHIP)
AND CONTROL OF KENTUCKY POWER COMPANY)

CASE NO.
2021-00481

**LS POWER DEVELOPMENT, LLC'S RESPONSES
TO JOINT APPLICANTS' REQUEST FOR INFORMATION**

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


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| 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 |) | |

VERIFICATION OF THOMAS HOATSON

STATE OF NEW JERSEY)
)
COUNTY OF MIDDLESEX)

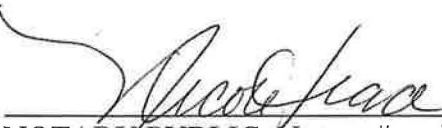
Comes now Thomas Hoatson, Director of Project Development, for LS Power Development, LLC, being first duly sworn, and states that he has supervised the preparation of his Responses to Joint Applicants' Request for Information in the above-styled matter, that he would respond in the same manner to the questions if so asked upon taking the stand, and that these Responses are true and accurate to the best of his knowledge, information, and belief formed after a reasonable inquiry as of the date set forth below.



Thomas Hoatson

The foregoing Verification was signed, acknowledged and sworn to before me this 14th day of March, 2022, by Thomas Hoatson.

NICOLE M IRACE
NOTARY PUBLIC
State of New Jersey
ID # 50045723
My Comm. Expires September 16, 2026



NOTARY PUBLIC, Notary # 50045723
Commission expiration: September 16, 2026

LS POWER DEVELOPMENT, LLC

PSC CASE NO. 2021-00481

REQUEST FOR INFORMATION RESPONSE

**JOINT APPLICANTS' REQUEST FOR INFORMATION TO LS POWER
DEVELOPMENT, LLC—MARCH 4, 2022**

REQUEST 1

RESPONSIBLE PERSON: Thomas Hoatson

COMPANY: LS Power Development, LLC

Request 1. Please state whether LS Power has prepared any financial analysis comparing costs and benefits of the three options for Kentucky Power (PJM RPM member, PJM FRR member or not in PJM). If so, please provide such analysis.

Response 1.

LS Power relied on benefits calculations from PJM regarding the cost and emissions savings of the PJM market as well as publicly available information on the capacity cost of another AEP-owned FRR entity and PJM capacity market clearing prices in its February 21, 2022 testimony¹. Because the PJM Tariff contains broad confidentiality provisions with respect to releasing data on individual PJM Members and their assets, LS Power is unable to perform financial analysis quantifying the specific costs and benefits of Kentucky Power participating in

¹ See Direct Testimony of Thomas Hoatson pp. 6-8 (February 22, 2022).

PJM as an RPM or FRR member or exiting PJM. To the extent that information does become publicly available, LS Power would welcome the opportunity to work closely with Kentucky Power, the Commission and any third parties in performing such analysis as suggested in its testimony.

LS POWER DEVELOPMENT, LLC

PSC CASE NO. 2021-00481

REQUEST FOR INFORMATION RESPONSE

**JOINT APPLICANTS' REQUEST FOR INFORMATION TO LS POWER
DEVELOPMENT, LLC—MARCH 4, 2022**

REQUEST 2

RESPONSIBLE PERSON: Thomas Hoatson

COMPANY: LS Power Development, LLC

Request 2. Please state whether LS Power prepared any financial forecasts comparing costs and benefits of the three options for Kentucky Power (PJM RPM member, PJM FRR member or not in PJM). If so, please provide such forecasts.

Response 2.

Please refer to the response provided in Request 1.