

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)	

**JOINT APPLICANT’S
REQUEST FOR INFORMATION TO LS POWER**

American Electric Power Company, Inc. (“AEP”), Kentucky Power Company (“Kentucky Power” or the “Company”), and Liberty Utilities Co. (“Liberty”) (collectively, “Joint Applicants”), by counsel, propound the following data requests upon LS Power Development, LLC (“LS Power”). LS Power shall respond to these requests in accordance with the provisions of the Commission’s January 6, 2022, Order, applicable regulations, and the instructions set forth below.

INSTRUCTIONS

1. Please provide written responses, together with any and all exhibits pertaining thereto, separately indexed and tabbed by each response.
2. The responses provided should restate Joint Applicants’ request and also identify the witness(es) responsible for supplying the information.
3. If any request appears confusing, please request clarification directly from counsel for Joint Applicants.

4. Please answer each designated part of each information request separately. If you do not have complete information with respect to any item, please 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.

5. To the extent that the specific document, workpaper, or information does not exist as requested, but a similar document, workpaper, or information does exist, provide the similar document, workpaper, or information.

6. 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.

7. If LS Power objects to any request on any grounds, please notify counsel for Joint Applicants as soon as possible.

8. For any document withheld on the basis of privilege, state the following: date; author; addressee; blind copies; all persons to whom distributed, shown, or explained; and, the nature and legal basis for the privilege asserted.

9. In the event any document called for has been destroyed or transferred beyond the control of the company, state the following: 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.

These requests shall be deemed continuing so as to require further and supplemental responses if the company receives or generates additional information within the scope of these requests between the time of the response and the time of any hearing conducted hereon.

Respectfully submitted,

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Request for Information

1. Please stated 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.
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.