

American Electric Power Company, Inc.  
Kentucky Power Company  
Liberty Utilities Co.  
KPSC Case No. 2021-00481  
LS Power Development, LLC's Post-Hearing Data Requests  
Dated March 31, 2022

**DATA REQUEST**

**LS POWER - PHDR 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.

**RESPONSE:**

Liberty would not agree to such a condition. The extensive commitments made by Liberty, including the establishment of a \$40 million fund to assist customers with high fuel cost, as well as the proposed three year deferral of the Big Sandy Decommissioning Rider, which together will save the average residential electric heat customer \$30 per month, as more fully set forth in Exhibit PE-R4 and in the Rebuttal Testimony of Peter Eichler, render such a condition unnecessary. Further, Liberty has committed that "[a]ll costs associated with the proposed transaction will not have the effect of increasing Kentucky Power's rates for electric service. See Exhibit PE-R4. Further, the Commission has previously determined that due to the anticipated savings from the termination of the Rockport UPA and termination of associated costs that are currently in base rates, Kentucky Power should file a general base rate adjustment application for rates effective January 1, 2024. Therefore, there is no basis to adjust the timing of the next general base rate adjustment application.

Witness: Peter Eichler

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**DATA REQUEST**

**LS POWER - PHDR 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.

**RESPONSE:**

As stated in Exhibit PE-R4 to Peter Eichler's rebuttal testimony, Liberty committed to "[w]ithin 2 years of the close of the transaction, Kentucky Power will evaluate the benefits and costs of its participation in the PJM, and to the extent appropriate, explore alternatives." Without the benefit of the results of such an analysis and any determinations made by the Commission related to the analysis should they be necessary, on such an analysis, Liberty cannot agree to this proposed condition.

Witness: Peter Eichler