

American Electric Power Company, Inc.
Kentucky Power Company
Liberty Utilities Co.
KPSC Case No. 2021-00481
Sierra Club's First Set of Data Requests
Dated February 4, 2022

DATA REQUEST

SC 1_1 Please provide (or provide access to) unredacted copies of the Joint Applicants' responses to all requests for information, and any all other filings containing redacted confidential information, in this proceeding.

RESPONSE

The Joint Applicants will provide Sierra Club with documents filed in the record of this case consistent with the Commission's Rules of Procedure and orders.

Respondent: Counsel

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SC 1_2 Reference Commission Case No. 2019-00443, and KPC's 2019 IRP, the Staff Report (dated February 2021), and the Commission's Final Order (dated June 4, 2021), therein.

- a) Please confirm whether Liberty has reviewed each of the aforementioned documents (including an unredacted copy of that IRP), at a minimum, in the aforementioned document. If not confirmed, explain why not and indicate whether Liberty will do so now.
- b) Please state whether Liberty has formulated any disagreement with any portions of that IRP, Staff Report, or Final Order, including by way of either disagreeing with any explicit content therein or finding them to have problematic omissions. If so, please identify such points of disagreement, and provide any documents (e.g., memoranda, reports, presentations, etc.) that memorialize the same.

RESPONSE

a. Confirmed, with the exception of the unredacted copy of the IRP. The scope and nature of publicly available information were sufficient for the level of review Liberty performed during its due diligence work, where it examined these documents.

b. Liberty's primary objective in reviewing the IRP documentation was to explore the planning process and issues in Kentucky, along with the parties' respective positions on key issues. Agreeing or disagreeing with certain parties or positions would involve performing its own research and/or analysis of sufficient depth, which was beyond Liberty's intended scope of evaluation. Nevertheless, Liberty did note the issues that caused significant debate, including:

- the relative value of PJM FRR participation;
- the extent of the statutory requirement to serve native load with local generation;
- the pricing source and limitations of assumptions on renewable generation and storage;
- incorporation / enhancement of analysis of transmission system constraints, Volt/Var Optimization, Distributed Generation and DSM;

- the notion of flexibility and other added value drivers in relation to the lowest cost requirement.

Along with the Staff's formal recommendations, Liberty will ensure to incorporate the outcomes of the 2019 IRP process into the next iteration.

Witness: Peter Eichler

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SC 1_3 Please identify when Liberty intends on filing its first Integrated Resource Plan (IRP) with the Commission, assuming the transfer at issue in this case is approved and executed. If Liberty does not have such time in mind, explain why not and provide your best prediction of when Liberty will know.

RESPONSE

While Liberty's preference would be to file Kentucky Power's next IRP by December 20, 2022, the current due date, there are several factors that could impact the timing of its filing. One is the ultimate timing of the transaction's approval and close and the Liberty's assumption of the operating and planning mandate of Kentucky Power. (As the buyer of Kentucky Power, Liberty cannot direct the operation of Kentucky Power.) The other is the Commission's December 27, 2021 order in case No. 2021-00420 that authorizes Kentucky Power to conduct a DSM and Energy Efficiency Market Potential Study. Liberty and Kentucky Power both see the benefits of incorporating the results of the Market Potential Study into the IRP in terms of both comprehensiveness of planning analysis and potential analysis efficiencies. While Kentucky Power is currently exploring the feasibility of conducting both studies in parallel or close sequencing, it is possible that the originally contemplated timeline may prove challenging. In any case, Kentucky Power expects to notify the Commission and seek authority to file the IRP at a later date should it determine that a delay of the filing would be beneficial.

Witness: Peter Eichler