

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

DATA REQUEST

- AG 2_4** Reference the response to AG-DR-1-25, which states: “The attached file, JA_R_AG_1_25_ConfidentialAttachment1.xlsx, provides a preliminary scenario of what Liberty believes should be explored for Kentucky Power's service territory from the perspective of augmenting and/or replacing the winding down fossil generation with renewable sources. Should the transaction be approved, Liberty will ensure that any such scenario of future integration of renewables or any other form of generation is studied in the Integrated Resource Planning process and will follow the requisite approvals processes. Overall, Liberty will look to bring benefits to Kentucky Power customers by utilizing similar experiences, such as replacing fossil generation with renewable generation following our successful Customer Savings Plan project within our Empire Electric utility where the company replaced 200 MW of uneconomic fossil generation with 600 MW of wind, while generating a long-term cost savings for Empire’s customers.”
- a. Provide references for all dockets in which the Empire project and associated customer savings were discussed and/or approved by the Commission of the relevant jurisdiction.
 - b. Regarding all Liberty electric utilities, provide the residential, commercial and industrial rates;
 - (1) one year before Liberty acquired each such utility,
 - (2) one year after the acquisition was approved, and
 - (3) three years after the acquisition was approved.

RESPONSE

- a. Please see Missouri Public Service Commission Files Nos. EO-2018-0092 and EA 2019-0010 and Arkansas Public Service Commission Dockets 18-029-U and 19-066-U.
- b. Please refer to the confidential attachment JA_R_AG_2_4_Attachment.xlsx.

Witness: Peter Eichler

FEBRUARY 18, 2022 SUPPLEMENTAL RESPONSE

- a. Please see Missouri Public Service Commission Files Nos. EO-2018-0092 and EA 2019-0010 and Arkansas Public Service Commission Dockets 18-029-U and 19-066-U.

b. Please refer to the attachment JA_R_AG_2_4_Attachment.xlsx. The original response erroneously referred to this attachment as being confidential.

Witness: Peter Eichler