

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

ELECTRONIC APPLICATION OF KENTUCKY)	
POWER COMPANY FOR AN ORDER)	
APPROVING THE COMPANY'S AMENDED)	Case No. 2022-00181
TARIFF E.D.R. TO INCREASE CAPACITY)	
AVAILABLE TO BE SERVICED UNDER THE)	
TARIFF AND FOR REQUIRED DEVIATIONS)	
FROM THE COMMISSION'S SEPTEMBER 24,)	
1990 ORDER IN ADMINISTRATIVE CASE)	
NO. 327)	

**ATTORNEY GENERAL'S MOTION FOR HEARING OR, IN THE
ALTERNATIVE, LEAVE TO FILE COMMENTS**

The Attorney General requests that the Commission issue an order providing sufficient process for the full development of the issues presented by the application filed by Kentucky Power Company (“Kentucky Power”). With the filing of an application on June 9, 2022, Kentucky Power requested substantial revisions to its Tariff EDR. Pursuant to a procedural schedule issued on June 20, 2022, the Commission allowed the Attorney General, and other intervenors, until June 24, 2022 to file initial data requests with responses to those requests to be filed by the Company by July 1, 2022. The Procedural Order was silent as to the process that was to take place subsequent to Kentucky Power’s response to those requests.

Kentucky Power’s application requested, “an expedited decision at the Commission’s earliest convenience and no later than July 11, 2022.” As support for that request, Kentucky Power states that, “[t]he Company is at the end of negotiations with the 250 MW customer and anticipates entering into a Tariff E.D.R. contract with the

customer (assuming the requested authority is granted) no later than July 29, 2022.”

The Attorney General would prefer that a hearing be scheduled on these important issues with the opportunity to file a post-hearing brief. In the event the Commission determines time is of the essence and insufficient for the scheduling of a hearing, the Attorney General requests that the Commission set a date certain by which the Attorney General may file a comment providing its position on the issues presented by the application and developed through data requests.

Respectfully submitted,

DANIEL J. CAMERON
ATTORNEY GENERAL



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Certificate of Service and Filing

Pursuant to the Commission's Orders and in accord with all other applicable law, Counsel certifies that, on July 5, 2022, a copy of the forgoing was served by electronic mail to the following.

moverstreet@stites.com
hgarcia1@aep.com

this 5th day of July, 2022

A handwritten signature in blue ink, appearing to read "J. Michael West". The signature is written in a cursive style with a horizontal line extending from the end.

Assistant Attorney General