

- A request to identify a natural person means to state his or her full name and residence address, his or her present last known position and business affiliation at the time in question.
- A request to identify a document means to state the date or dates, author or originator, subject matter, all addressees and recipients, type of document (e.g., letter, memorandum, telegram, chart, etc.), number or code number thereof or other means of identifying it, and its present location and custodian. If any such document was, but is no longer in KIUC or the Attorney General's possession or subject to its control, state what disposition was made of it.
- A request to identify a person other than a natural person means to state its full name, the address of its principal office, and the type of entity.
- "Identify" used in a fashion other than as described above means to provide in detail, including all assumptions, bases, facts considered, and rationale if not called for in another part of the data request, the requested information.
- "And" and "or" should be considered to be both conjunctive and disjunctive, unless specifically stated otherwise.
- "Each" and "any" should be considered to be both singular and plural, unless specifically stated otherwise.
- Words in the past tense should be considered to include the present, and words in the present tense include the past, unless specifically stated otherwise.
- "You" or "your" means the person whose filed testimony is the subject of these interrogatories and, to the extent relevant and necessary to provide full and complete answers to any request, "you" or "your" may be deemed to include any person with information relevant to any interrogatory who is or was employed by or otherwise associated with the witness or who assisted, in any way, in the preparation of the witness' testimony.
- "Company" means Kentucky Power Company.
- "AEP" means American Electric Power Company, Inc.

INSTRUCTIONS

1. If any matter is evidenced by, referenced to, reflected by, represented by, or recorded in any document, please identify and produce for discovery and inspection each such document.
2. These interrogatories are continuing in nature, and, without regard to the date created or obtained, information which the responding party later becomes aware of, or has access to, and which is responsive to any request is to be made available to Kentucky Power. Any studies, evaluations, analyses, documents, or other subject matter not yet completed that will be relied upon during the course of this case should be so identified and provided as soon as they are completed. The respondent is obliged to change, supplement and correct all answers to interrogatories to conform to available information, including such information as it first becomes available to the respondent after the answers hereto are served.
3. Unless otherwise expressly provided, each interrogatory should be construed independently and not with reference to any other interrogatory herein for purpose of limitation.
4. The answers provided should first restate the question asked and also identify the person(s) supplying the information.
5. Please answer each designated part of each information request separately. If you do not have complete information with respect to any interrogatory, 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.
6. In the case of multiple witnesses, each interrogatory should be considered to apply to each witness who will testify to the information requested. Where copies of testimony, transcripts or depositions are requested, each witness should respond individually to the information request.
7. The interrogatories are to be answered under oath by the witness(es) responsible for the answer.
8. Please furnish any non-disclosure or other required for disclosure of any information or response for which confidential treatment provided.

DATA REQUESTS

1. Provide all schedules, tables, and charts included in the testimony and exhibits to the testimony of Lane Kollen in electronic format, with formulas intact and visible, and no pasted values.
2. Provide all workpapers, source documents, and electronic spreadsheets used in the development of Mr. Kollen's testimony. The requested information, if so available, should be provided in an electronic format, with formulas intact and visible, and no pasted values.
3. If not already provided as part of your response to Data Request No. 1 or 2, please show the work of how Mr. Kollen calculated each value contained in his direct testimony such that his calculation(s) could be reproduced by the Company or the Commission if needed.
4. Provide all schedules, tables, and charts included in the testimony and exhibits to the testimony of Randy A. Futral in electronic format, with formulas intact and visible, and no pasted values.
5. Provide all workpapers, source documents, and electronic spreadsheets used in the development of Mr. Futral's testimony. The requested information, if so available, should be provided in an electronic format, with formulas intact and visible, and no pasted values.
6. If not already provided as part of your response to Data Request No. 4 or 5, please show the work of how Mr. Futral calculated each value contained in his direct testimony such that his calculation(s) could be reproduced by the Company or the Commission if needed.
7. Confirm whether, prior to the submission of their respective direct testimonies on December 2, 2022, Mr. Kollen and Mr. Futral had fully reviewed the Commission's October 3, 2002 Order in Case No. 2000-00495-B.
8. Refer to the sentence beginning on Line 18 of Page 6 of Mr. Kollen's direct testimony.
 - a. Please provide a definition for the "base unit equivalent methodology," and a citation for the definition provided, if applicable.
 - b. Please describe when the base unit equivalent ("BUE") methodology was first implemented and then subsequently used by Kentucky Power, as implied in Mr. Kollen's statement that he recommends that the Commission "re-implement" the BUE methodology.
9. Refer to the sentence beginning on Line 7 of Page 13 of Mr. Kollen's direct testimony. Please identify all facts relied upon and/or all record evidence supporting Mr. Kollen's assertion that the Company adjusts its market offers to PJM to address "AEP's CO2 systemwide emissions and its closely watched ESG scores." Please provide any analysis and supporting workpapers that support Mr. Kollen's assertion. If there are no facts, evidence, analysis, or workpapers that support this statement, please confirm.

10. Please confirm that, as a member of PJM, PJM directs the Company to dispatch its generation. If your response is anything other than an unqualified confirmation, please provide a detailed explanation of your response.
11. Refer to the sentence beginning on Line 10 of Page 11 of Mr. Kollen's direct testimony. Please explain in detail all ramifications for all affected parties if the Company did not preserve the coal it had in inventory and instead PJM had dispatched the company's coal-fired units and thereby depleted its coal supply.
12. Confirm whether you agree that the PJM locational marginal pricing ("LMP") is the most precise indicator of what the Company actually pays for energy purchases.
13. Please provide a sample calculation that fully demonstrates the concept of the PUE/BUE methodology supported by Mr. Kollen and Mr. Futral using the Company's actual historical data during the review period. Please provide this demonstrative in electronic format, with formulas intact and visible, and no pasted values.

Respectfully submitted,



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COMPANY