

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

In the Matter of:

ELECTRONIC TARIFF FILING OF)	
KENTUCKY UTILITIES COMPANY)	CASE NO. 2022-00371
FOR APPROVAL OF AN ECONOMIC)	
DEVELOPMENT RIDER SPECIAL)	
CONTRACT WITH BITIKI-KY, LLC)	

**JOINT INTERVENORS KENTUCKIANS FOR THE COMMONWEALTH, KENTUCKY
SOLAR ENERGY SOCIETY, MOUNTAIN ASSOCIATION, AND KENTUCKY
RESOURCES COUNCIL RESPONSE TO DATA REQUESTS FROM KENTUCKY
UTILITIES COMPANY**

KU DR JI 1. Regarding the educational and work experience of witness Chelsea Hotaling:

- a. Has Ms. Hotaling prepared a marginal cost of service study for any utility? If so, for each such study please provide the name of the utility, the relevant case identification information for the proceeding in which Ms. Hotaling supplied the study into the public record, and a copy of the study (or a working link to the study).
- b. Ms. Hotaling’s testimony states at page 1, lines 17-18, “I have reviewed over a dozen integrated resource plans (IRPs) and related filings by utilities....” Has Ms. Hotaling prepared or participated in preparing an IRP? If so, please provide the relevant case identification information for each proceeding in which Ms. Hotaling prepared or participated in preparing an IRP (or testimony based on such IRP) into the public record and a copy of the testimony or IRP (or working links to such testimony and IRP).
- c. Appendix A to Ms. Hotaling’s testimony indicates that she “specializ[es] in integrated resource planning and load forecasting” and “[her] current work is focused on all aspects of Integrated Resource Planning including ... load forecasting.”
 - i. Has Ms. Hotaling prepared a load forecast for any utility? If so, for each such load forecast please provide the name of the utility, the relevant case identification information for the proceeding in which Ms. Hotaling supplied the load forecast into the public record, and a copy of the load forecast (or a working link to the load forecast).
- d. Ms. Hotaling’s testimony states at page 1, lines 20-21, “I have performed my own capacity expansion and production cost modeling in numerous cases” The “Selected Projects” section of Appendix A of Ms. Hotaling’s testimony appears to indicate that she has performed such modeling nine times.
 - i. Please provide the relevant case identification information for each proceeding in which Ms. Hotaling supplied such modeling (or testimony based on such modeling) into the public record, and a copy of the testimony or modeling data (or working links to such testimony and modeling data).

- ii. If Ms. Hotaling has conducted “capacity expansion and production cost modeling” not otherwise addressed in the response to this request, please provide the relevant case identification information for each proceeding in which she supplied such modeling (or testimony based on such modeling) into the public record, and a copy of the testimony or modeling data (or working links to such testimony and modeling data).
- e. Appendix A to Ms. Hotaling’s testimony indicates that she received a B.S. degree in 2007 and an M.B.A. in 2012, but the first entry in the “Experience” heading is a Research Assistant position from 2016-2019. Please provide Ms. Hotaling’s work experience from 2007 to 2016, including employer names, positions held, dates of employment, and brief descriptions of the tasks she performed for each employer.
- f. Please provide a copy of or working link to each of the items listed in the “Publications” section of Appendix A of witness Hotaling’s testimony.
- g. To the extent not otherwise provided in response to this request, please provide a copy of or working link to each piece of testimony filed under witness Hotaling’s name in any utility-related proceeding.

KU DR JI 1 RESPONSE:

- a. Ms. Hotaling has not prepared a marginal cost of service study on behalf of a utility; however, the generation capacity, transmission, and energy cost aspects of the study overlap with key elements of utility Integrated Resource Plans (“IRPs”), which is Ms. Hotaling’s area of expertise.
- b. Ms. Hotaling lead the preparation of the 2020 IRP for Washington Electric Cooperative, Inc. (“WEC”) in Vermont (Case No. 20-3324-PET at <https://epuc.vermont.gov/?q=node/64/153587/FV-ALLOTDOX-PTL>). Ms. Hotaling was responsible for developing the load forecast, which included the impacts of distributed solar, electric vehicles, and heat pumps; performing the financial analysis of WEC’s resource portfolio; and evaluating the WEC resource portfolio across several scenarios and sensitivities. In addition, Ms. Hotaling has participated in dozens of IRP stakeholder workshop meetings with utilities, submitted comments and feedback on those meetings and on modeling data, and critically reviewed IRP filings where she has either participated in the submission of comments on the IRP or formal testimony. Ms. Hotaling has been involved in the review of IRPs and related filings by utilities located in Arizona, Colorado, Kansas, Kentucky, Iowa, Indiana, Michigan, Missouri, Montana, Minnesota, New Mexico, Nova Scotia, Puerto Rico, and South Carolina. Furthermore, Ms. Hotaling has been involved in several cases where she performed her own capacity expansion and production cost modeling to put forward alternative resource portfolios (see response to KU DR JI 1(d) below).
- c. N/A
 - i. Ms. Hotaling participated in the preparation of the load forecast for the 2020 WEC IRP, as well as dozens of IRP stakeholder meetings where load forecast development was discussed (see response to KU DR JI 1(b) above).
- d. N/A
 - i. Joint Intervenors object to this request to the extent that it seeks disclosure of information that utilities in other proceedings have designated as confidential and subject to a protective order. Ms. Hotaling responds that the underlying modeling

inputs in each of the subject proceedings have been designated as confidential, and therefore Ms. Hotaling cannot provide modeling data in response to this request. Subject to and without waiving this objection, please see the table below which highlights each time when Ms. Hotaling performed capacity expansion and production cost modeling that was submitted through comments or filed testimony. Please note that the modeling Ms. Hotaling performed for Case 19-00195 was in support of testimony filed by Anna Sommer.

Utility/Region	Testimony or Comments	Case Number	Reference
Ottertail Power IRP	Comments	E017-RP-21-339	Not yet filed
Public Service of New Mexico Clean Energy Study	Report	N/A	Report in progress on behalf of Western Resource Advocates, in consultation with PNM.
DTE 2022 IRP	Testimony	U-21193	Not yet filed
MidAmerican	Testimony	RPU-2022-0001	https://wcc.efs.iowa.gov/cs/idcplg?IdcService=G ET_FILE&allowInterrupt=1&RevisionSelectionMethod=latest&dDocName=2107656&noSaveAs=1
Minnesota Power 2021-2035 IRP	Comments	E015/RP-21-33	https://www.edockets.state.mn.us/edockets/searchDocuments.do?method=showPoup&documentId={70C77680-0000-CB27-874E-28D1CE711075}&documentTitle=20224-185372-06 https://www.edockets.state.mn.us/edockets/searchDocuments.do?method=showPoup&documentId={B05F4A82-0000-C737-91E5-CC13C9CE0230}&documentTitle=20227-187928-02
Xcel MN 2020-2034 Upper Midwest IRP	Comments	E002/RP-19-368	https://www.edockets.state.mn.us/edockets/searchDocuments.do?method=showPoup&documentId={D0609377-0000-C49F-8DE4-F9CEA5162F84}&documentTitle=20212-170901-05 https://www.edockets.state.mn.us/edockets/searchDocuments.do?method=showPoup&documentId={50D3447A-0000-C95C-9889-

			2C20217C061A}&documentTitle=20216-175412-04 https://www.edockets.state.mn.us/edockets/search/Documents.do?method=showPoup&documentId={8088857C-0000-C999-A29D-F8867E538495}&documentTitle=202110-178866-05
Duke Energy Indiana 2021 IRP	Comments	N/A	https://www.in.gov/iurc/files/PUBLIC-EFG-Modeling-Report-of-CAC-Earthjustice-VoteSolar-on-DEI-2021-IRP-5-16-22FINAL.pdf
PSCo 2021 ERP	Testimony	21A-0141E	https://www.dora.state.co.us/pls/efi/EFI_Search_UI.search . To access, search by docket number and filter for testimony (direct filed on Oct. 11, 2021, cross-answer filed on Nov. 12, 2021).
Evergy Kansas IRP	Comments	19-KCPE-096-CPL	https://estar.kcc.ks.gov/estar/ViewFile.aspx/S202111021551202890.pdf?Id=fe59a88a-f547-49d5-82dc-3582efa6cedc
Evergy Missouri 2021 IRP	Comments	EO-2021-0036	https://efis.psc.mo.gov/mpsc/commoncomponents/view_itemno_details.asp?caseno=EO-2021-0036&attach_id=2022004962
Consumers IRP	Testimony	U-21090	https://mi-psc.force.com/sfc/servlet.shepherd/version/download/068t000000ViamjAAB
PNM Application for Abandonment, Financing, and Resource Replacement	Modeling Support for Anna Sommer's Testimony	19-00195	https://edocket.nmprc.state.nm.us/Login.aspx?ReturnUrl=%2f . To access, create a guest account and search by docket number. Testimony was filed December 13, 2019.

- ii. Joint Intervenors object to this request to the extent that it seeks disclosure of information that utilities in other proceedings have designated as confidential and subject to a protective order. Ms. Hotaling responds that the underlying modeling inputs in each of the subject proceedings have been designated as confidential, and therefore Ms. Hotaling cannot provide modeling data in response to this request. Subject to and without waiving this objection, Ms. Hotaling's resume also highlights modeling being performed for GridLab and the Minnesota Center for Environmental Advocacy (Otter Tail Power IRP), also referenced in the table above. Both projects are in progress and Ms. Hotaling does not have any references to filed reports or comments.

- e. Joint Intervenors object to this request to the extent that it seeks information not relevant to this proceeding and not likely to lead to the discovery of relevant evidence. Subject to and without waving this objection, Joint Intervenors respond that Ms. Hotaling’s relevant professional experience began in 2016 and is accurately summarized in her resume. Prior to 2016, Ms. Hotaling worked in administrative positions in fields unrelated to her current profession. There is also a typo in the “Education” section of the version of Ms. Hotaling’s resume that was attached as Appendix A. Ms. Hotaling enrolled at Elmira College in 2007 and graduated in 2011.
- f. Please see the table below for links to each of the publications provided in Ms. Hotaling’s resume.

Publication	Link
Willingness to pay for microgrids to enhance community resilience	https://www.sciencedirect.com/science/article/abs/pii/S0301421521001178
The effect of renewable and nonrenewable electricity generation on economic growth	https://www.sciencedirect.com/science/article/abs/pii/S0301421517306389
Multi-stakeholder microgrids for resilience and sustainability	https://www.tandfonline.com/doi/abs/10.1080/17477891.2016.1263181
Resilient community microgrids: governance and operational challenges	https://www.sciencedirect.com/science/article/pii/B9780081022078000047

- g. Please see the table below for additional testimony that has been filed under Ms. Hotaling’s name.

Utility	Testimony or Comments	Case Number	Reference
Indiana Michigan Power IRP	Testimony	U-21189	https://mi-psc.force.com/sfc/servlet.shepherd/version/download/0688y000003RLqoAAG

Witness: Chelsea Hotaling

KU DR JI 2. Regarding the educational and work experience of witness Stacy L. Sherwood:

- a. Does Ms. Sherwood have any experience in economic development in Kentucky? If so, please describe that experience in detail and provide a copy of or a working link to each publication or piece of testimony by Ms. Sherwood concerning economic development in Kentucky.
- b. Other than Kentucky, does Ms. Sherwood have any experience in economic development? If so, please describe that experience in detail and provide a copy of or a working link to each publication or piece of testimony by Ms. Sherwood concerning economic development.

- c. If Ms. Sherwood has education or experience concerning cryptocurrency mining or the volatility of cryptocurrency markets, please describe that education or experience in detail and provide a copy of or a working link to each publication, paper, or piece of testimony by Ms. Sherwood concerning cryptocurrency mining or the volatility of cryptocurrency markets.
- d. Has Ms. Sherwood prepared a marginal cost of service study for any utility? If so, for each such study please provide the name of the utility, the relevant case identification information for the proceeding in which Ms. Sherwood supplied the study into the public record, and a copy of the study (or a working link to the study).

KU DR JI 2. RESPONSE:

- a. Ms. Sherwood does not have experience in economic development related to Kentucky prior to this case.
- b. Ms. Sherwood has worked on assessing environmental justice and economic development in Maryland. Specifically, she has reviewed applications for solar certificates of public convenience and necessity (CPCNs) where she assessed the economic development opportunities that would be provided at local and state levels as a result of the project. In addition, Ms. Sherwood helped establish the Maryland Department of Natural Resources' Power Plant Research Program's (PPRP's) definition for environmental justice to then assess the impact of renewable energy on various communities throughout the state of Maryland. Below is a list of those documents in which this work was performed.
 - Final Report Concerning the Maryland Renewable Portfolio Standard as Required by Chapter 393 of the Acts of The Maryland General Assembly of 2017, December 2019, Maryland Power Plant Research Program, <https://mdstatedocs.slrc.info/digital/collection/mdgov/id/24045/rec/1>. Section 2.5 of the Report was drafted by Ms. Sherwood.
 - Case No. 9495 IN THE MATTER OF THE APPLICATION OF KIEFFER FUNK, LLC FOR A CERTIFICATE OF PUBLIC CONVENIENCE AND NECESSITY TO CONSTRUCT A 11.80 MW SOLAR PHOTOVOLTAIC GENERATING FACILITY IN WASHINGTON COUNTY, MARYLAND. The MD PSC website does not provide links directly to the documents. To access, use [https://webpsc.psc.state.md.us/DMS/official-filings to search for Case No. 9495](https://webpsc.psc.state.md.us/DMS/official-filings%20to%20search%20for%20Case%20No.%209495), Item No. 23, Document 224968_57637.pdf, Sections 4.1, 4.2, 4.3, 4.3, 4.6.
 - Case No. 9642, APPLICATION OF BALTIMORE GAS AND ELECTRIC COMPANY FOR A CERTIFICATE OF PUBLIC CONVENIENCE AND NECESSITY FOR THE BUSH RIVER CROSSING PROJECT. The MD PSC website does not provide links directly to the documents. To access, use [https://webpsc.psc.state.md.us/DMS/official-filings to search for Case No. 9642](https://webpsc.psc.state.md.us/DMS/official-filings%20to%20search%20for%20Case%20No.%209642), Item No. 15 Document 232966_63711.pdf, Section 3.4.
- c. Ms. Sherwood does not have prior experience or education specifically related to cryptocurrency mining; as discussed in her testimony and resume, Ms. Sherwood's experience is in review of utility regulatory and tariff filings. Subsequent to preparing testimony for this case, Ms. Sherwood also prepared testimony for a case involving a proposed Kentucky Power special contract with a proposed cryptocurrency mining facility (Case No. 2022-00387).

- d. Ms. Sherwood has not performed a marginal cost of service study for any utility; as discussed in her testimony and resume, Ms. Sherwood's experience is in review of utility regulatory and tariff filings.

Witness: Stacy Sherwood

KU DR JI 3. Ms. Sherwood's testimony states at page 19, lines 5-6, "The utility should demonstrate that no financial harm will be incurred by existing customers as a result of the EDR discount."

- a. Please explain in detail how financial harm would be incurred by existing customers with the addition of the Bitiki load, even with the EDR discount.
- b. Do the Joint Intervenors agree that the marginal production demand cost of Bitiki's service, if any, will not be included in KU's base rates until new base rates go into effect following KU's next base rate case?
- c. Do the Joint Intervenors acknowledge that KU has committed to a rate-case stay out such that the earliest date new base rates can take effect following KU's next base-rate case is July 1, 2025?

KU DR JI 3. RESPONSE:

- a. The reference in the testimony is related to language providing recommended guidance to the Commission in its consideration of all EDR cases for cryptocurrency mining.

In this instance, there is potential for financial harm to occur on behalf of existing ratepayers if additional capacity purchases are required as a result of the coal plants retiring in 2028 to support Bitiki's load, and/or if the surety bond paid by Bitiki is not sufficient to protect against the risks of bankruptcy or default. On the other hand, the fact that Bitiki is using existing infrastructure and required no infrastructure upgrades to bring its load online is a significant factor reducing the risk of financial harm to ratepayers.

Ratepayers are harmed, however, when a customer such as Bitiki receives discounted EDR rates where it has not demonstrated that it would not choose to operate in the utility's service territory in the absence of the discount, and in particular where it has not demonstrated that any jobs or economic development would result from it receiving a discounted rate. Furthermore, if the EDR discount was not required to expand the Bitiki operations, it reduces the capacity available under the EDR tariff which could provide further economic development for the service territory.

- b. Yes.
- c. Yes, subject to the provisions of the Order in Case No. 2020-00349 and any subsequent Commission orders.

Witness: Stacy Sherwood

VERIFICATION

The undersigned, Chelsea Hotaling, being first duly sworn, deposes and says that she has personal knowledge of the matters set forth in the foregoing responses and that the information contained therein is true and correct to the best of her information, knowledge, and belief, after reasonable inquiry.

Chelsea Hotaling

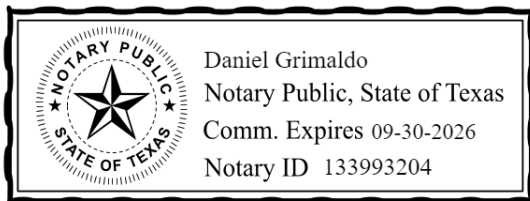
Chelsea Hotaling

Subscribed and sworn to before me by Chelsea Hotaling this 13th day of February, 2023.

DGG


Notary Public

My commission expires: 09/30/2026



Notarized Online with NotaryLive.com

This document is signed by

	Signatory	CN=Daniel Grimaldo, DNQ=A01410C0000018457DA187D0005359B, O=Texas, C=US
	Date/Time	Mon Feb 13 23:01:48 UTC 2023
	Issuer-Certificate	CN=IGC CA 1, OU=IdenTrust Global Common, O=IdenTrust, C=US
	Serial-No.	85078468265508387409051904163970202742
	Method	urn:adobe.com:Adobe.PPKLite:adbe.pkcs7.sh1 (Adobe Signature)

VERIFICATION

The undersigned, Stacy Shenwood, being first duly sworn, deposes and says that she has personal knowledge of the matters set forth in the foregoing responses and that the information contained therein is true and correct to the best of her information, knowledge, and belief, after reasonable inquiry.

Stacy Shenwood

Subscribed and sworn to before me by at this 14 day of FEB, 2023.

STACY SHENWOOD

[Signature]
Notary Public

My commission expires: 05/06/2025



CERTIFICATE OF SERVICE

This is to certify that this electronic filing of *Joint Intervenors Kentuckians for the Commonwealth, Kentucky Solar Energy Society, Mountain Association, and Kentucky Resources Council, Inc. Response To Data Requests From Kentucky Utilities Company* was submitted to the Commission on February 14, 2023; that the documents in this electronic filing are true representations of the materials prepared for the filing; and that the Commission has not excused any party from electronic filing procedures for this case at this time.

A handwritten signature in black ink, consisting of a large loop on the left and a series of smaller loops and a horizontal line extending to the right.
