

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

In the Matter of:

ELECTRONIC TARIFF FILING OF)	
KENTUCKY POWER COMPANY)	CASE NO. 2022-00387
FOR APPROVAL OF A SPECIAL)	
CONTRACT WITH EBON)	
INTERNATIONAL, LLC)	

**MOTION FOR LEAVE TO FILE CORRECTED TESTIMONY OF STACY L.
SHERWOOD ON BEHALF OF JOINT INTERVENORS**

Tom FitzGerald
Ashley Wilmes
Kentucky Resources Council
P.O. Box 1070
Frankfort, KY 40602
(502) 551-3675
FitzKRC@aol.com
Ashley@kyrc.org

*Counsel for Movants For Joint Intervention
Kentuckians for the Commonwealth,
Kentucky Solar Energy Society, Mountain
Association, and Kentucky Resources
Council, Inc.*

Dated: March 17, 2023

Come the Joint Intervenors, by counsel, and respectfully move the Commission for leave to file the attached tendered *Testimony Of Stacy L. Sherwood (Corrected) on behalf of Mountain Association, Kentuckians for the Commonwealth, Appalachian Citizens' Law Center, Sierra Club, and Kentucky Resources Council, Inc. as Joint Intervenors.*

In support of this Motion, Joint Intervenors state as follows:

1. After the filing of the *Testimony Of Stacy L. Sherwood* it was discovered that certain portions of that testimony were in need of revision for accuracy and clarity.

2. Specifically, these portions of the *Testimony* previously filed, are proposed for revision as originally filed:

Changes:

On page 8, line 9, deleted "Q"

On page 22, line 15, changed to "A. Yes."

On page 19, strike lines 1-2

On page 19, replace line 8 (starting with "Furthermore") with:

"Furthermore, knowing that Kentucky Power needs to procure additional capacity to meet Ebon's load, it seems likely that the Big Sandy generation unit may need to operate more and/or have its life extended for additional years into the future to serve some or all of Ebon's load. If Kentucky Power, through its integrated resource plan, identifies that the Big Sandy generation unit will have increased generation and/or an extended lifespan to serve Ebon's load, then it is likely that an increase in greenhouse gas emissions will occur. However, it is likely that regardless of the source of generation, emissions will increase, as the marginal fuel in PJM is predominately gas and secondarily coal.

In response to this question it is unknown exactly how Kentucky Power plans to meet the Ebon load because to date we have seen no analysis for their system with or without Ebon, such as we would expect to see in Kentucky Power's forthcoming integrated resource plan (due to be filed March 20, 2023). However, knowing that Kentucky Power needs to procure additional capacity to meet Ebon's load, it seems likely that the Big Sandy generation unit may need to operate more and/or have its life extended for additional years into the future to serve some or all of Ebon's load. If

Kentucky Power, through its integrated resource plan, identifies that the Big Sandy generation unit will have increased generation and/or an extended lifespan to serve Ebon's load, then it is likely that an increase in greenhouse gas emissions will occur. However, it is likely that regardless of the source of generation, emissions will increase, as the marginal fuel in PJM is predominately gas and secondarily coal (Source: https://www.monitoringanalytics.com/reports/PJM_State_of_the_Market/2022/2022q3-som-pjm.pdf, p. 199).”

3. Counsel for Kentucky Power Company has been consulted and has stated no opposition to this motion for leave to file corrected testimony.

Wherefore, for the reasons stated herein, Joint Intervenors respectfully request that the tendered *Testimony Of Stacy L. Sherwood (Corrected) on behalf of Mountain Association, Kentuckians for the Commonwealth, Appalachian Citizens' Law Center, Sierra Club, and Kentucky Resources Council, Inc. as Joint Intervenors* be accepted in place of the original *Testimony Of Stacy L. Sherwood on behalf of Mountain Association, Kentuckians for the Commonwealth, Appalachian Citizens' Law Center, Sierra Club, and Kentucky Resources Council, Inc. as Joint Intervenors* that was previously filed in this matter.

Respectfully submitted,



Tom FitzGerald
Ashley Wilmes
Kentucky Resources Council
P.O. Box 1070
Frankfort, KY 40602
(502) 551-3675
FitzKRC@aol.com
Ashley@kyrc.org

*Counsel for Movants For Joint Intervention
Kentuckians for the Commonwealth,
Mountain Association, Appalachian Citizens'
Law Center, Sierra Club, and Kentucky
Resources Council, Inc.*

CERTIFICATE OF SERVICE

In accordance with the Commission's July 22, 2021 Order in Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID-19*, this is to certify that the electronic filing was submitted to the Commission on March 17, 2023; that the documents in this electronic filing are a 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.



Tom FitzGerald