

**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)	

**POST-HEARING DATA REQUESTS OF JOINT INTERVENORS
MOUNTAIN ASSOCIATION, KENTUCKIANS FOR THE
COMMONWEALTH, APPALACHIAN CITIZENS' LAW CENTER, SIERRA
CLUB, AND KENTUCKY RESOURCES COUNCIL, INC.**

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Association, Kentuckians for the
Commonwealth, Appalachian Citizens' Law
Center, Sierra Club, and Kentucky
Resources Council, Inc.*

Dated: July 21, 2023

DEFINITIONS

1. “Document” means the original and all copies (regardless of origin and whether or not including additional writing thereon or attached thereto) of any memoranda, reports, books, manuals, instructions, directives, records, forms, notes, letters, or notices, in whatever form, stored or contained in or on whatever medium, including digital media.
2. “Study” means any written, recorded, transcribed, taped, filmed, or graphic matter, however produced or reproduced, either formally or informally, a particular issue or situation, in whatever detail, whether or not the consideration of the issue or situation is in a preliminary stage, and whether or not the consideration was discontinued prior to completion.
3. “Person” means any natural person, corporation, professional corporation, partnership, association, joint venture, proprietorship, firm, or the other business enterprise or legal entity.
4. A request to identify a natural person means to state his or her full name and business address, and last known position and business affiliation at the time in question.
5. 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.), identifying number, and its present location and custodian. If any such document was but is no longer in the Company’s possession or subject to its control, state what disposition was made of it and why it was so disposed.
6. 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.
7. “And” and “or” should be considered to be both conjunctive and disjunctive, unless specifically stated otherwise.
8. “Each” and “any” should be considered to be both singular and plural, unless specifically stated otherwise.
9. 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.

10. "You" or "your" means the person whose filed testimony is the subject of these data requests 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 other 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.
11. "Kentucky Power" or "the Company" means Kentucky Power Company and/or any of its officers, directors, employees or agents who may have knowledge of the particular matter addressed, and affiliated companies.
12. "Joint Intervenors" means the Mountain Association, Kentuckians For The Commonwealth, Appalachian Citizens' Law Center, Sierra Club, and Kentucky Resources Council, Inc., who were granted the status of full joint intervention in this matter.
13. "Proposed Special Contract" means the proposed special contract between KPCO and Ebon that is at issue in this proceeding.
14. "Proposed Facility" means the facility to be constructed by Ebon in Lawrence County, Kentucky that is the subject of the Proposed Special Contract.
15. "Ebon" means Ebon International, LLC and/or any of its officers, directors, employees or agents who may have knowledge of the particular matter addressed, as well as any parent companies or affiliated companies.

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 requests for information are continuing in nature, and 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 Joint Intervenors. Any studies, 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 data request 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.

**POST-HEARING DATA REQUESTS PROPOUNDED TO KENTUCKY POWER
COMPANY BY JOINT INTERVENORS**

3.1. Please refer to Joint Intervenors' cross-examination of Kentucky Power witness Brian West beginning at approximately 1:34 pm on July 20, 2023.

- a. Did Kentucky Power look into whether there would be any effect on the reliability of the transmission system with the Proposed Facility operating at times when the Big Sandy gas plant is not online? Please identify any studies or other analyses that were performed, who performed them and when, and please provide copies of any such studies or analyses.
- b. Did Kentucky Power look into whether, if the Big Sandy gas plant were to retire, it would have any effect on the reliability of the transmission system with the Proposed Facility's load on the system? Please identify any studies or other analyses that were performed, who performed them and when, and please provide copies of any such studies or analyses.

Respectfully submitted,



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CERTIFICATE OF SERVICE

This is to certify that the electronic filing was submitted to the Commission on July 21, 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