

Kentucky Power Company  
KPSC Case No. 2022-00387  
Joint Intervenor's First Set of Data Requests  
Dated December 9, 2022  
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**DATA REQUEST**

- 1\_6** Please produce copies of any documents in the Company's possession, other than those produced in response to previous data requests, concerning the potential economic development benefits of the Proposed Facility.
- a. Please also provide a breakout of the level of economic development anticipated from Phase I and Phase II, independently.
  - b. Please detail the level of investment for the Ebon Project, including a breakdown of the investment by construction materials and buildings fixture versus equipment.

**RESPONSE**

The Company does not have any other responsive documents in its possession.

a. The economic development benefits of the Ebon project are many. First, the jobs are much needed in Lawrence County and the surrounding counties. See the Direct Testimony of Company Witness West at page 4, lines 7-21. Ebon will provide training for the general maintenance worker positions, making the positions attractive to those who are currently unskilled in that area. Ebon also plans to hire electrical and network engineers as well as professional staff and is working with Eastern Kentucky Concentrated Employment (EKCEP) to recruit those positions. Additionally, by locating this type of project on land that could not be used otherwise, Kentucky Power is not committing a site that could be used for traditional manufacturing. An added benefit will come in the form of school tax to Lawrence County Schools. School tax is not exempt in the incentives offered by the Commonwealth. Based on Ebon's estimated bill, Lawrence County Schools could receive \$10,643,400 over the life of the contract.

Please see KPCO\_R\_JI\_1\_6\_Attachment1 for additional details regarding the estimated economic development benefit based on estimated payroll.

b. See the Company's response to AG-KIUC 1-20.

See also the Company's responses to AG-KIUC 1-19, JI 1-2, JI 1-3, JI 1-6 and JI 1-38.

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**February 2, 2023 Supplemental Response**

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While preparing these responses to the second set of discovery, the Company became aware that Ebon plans to apply with the Kentucky Department of Revenue for an exemption from utility gross receipts license tax (school tax). See KRS 160.613(1)(c). While the statute speaks for itself, generally this may exempt Ebon from being assessed any school tax through June 30, 2030 (see KRS 160.613(6)(b)) and Lawrence County School District would benefit from the school tax for all years of the contract after June 30, 2030.

Witness: Amanda C. Clark

**VERIFICATION**

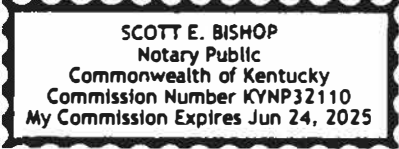
The undersigned, Amanda C. Clark, being duly sworn, deposes and says she is the External Affairs Manager for Kentucky Power Company, that she has personal knowledge of the matters set forth in the foregoing responses and the information contained therein is true and correct to the best of her information, knowledge, and belief.

Amanda Clark  
Amanda C. Clark

Commonwealth of Kentucky )  
) Case No. 2022-00387  
County of Boyd )

Subscribed and sworn before me, a Notary Public, by Amanda C. Clark this 31<sup>st</sup> day of January 2023.

Scott E. Bishop  
Notary Public



My Commission Expires June 24 2025

Notary ID Number: KYNP 32110