

Kentucky Power Company
KPSC Case No. 2022-00387
Joint Intervenor's Post Hearing Data Request
Dated July 21, 2023

DATA REQUEST

- JI PHDR_1** Please refer to Joint Intervenor's 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.

RESPONSE

- a. The Company objects to these requests on the basis that they seek information that is neither relevant to this proceeding nor reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving these objections, the Company performed preliminary contingency analysis utilizing PJM's proprietary load flow case, in August 2021, after the customer first requested to connect. That analysis included scenarios in which Big Sandy was not online. The Company's analysis did not identify any reliability issues related to the loss of the Big Sandy gas plant. The Company is unable to produce PJM's proprietary load flow case, which is owned by PJM. Per the Attachment M-3 Process, PJM also will analyze this scenario as part of its do no harm analysis. This analysis will be completed after the project solution is submitted to the PJM for the stakeholder review at a future SRRTEP meeting. The solution submittal will occur if the contract that is the subject of this proceeding is approved and the Proposed Facility's construction is ready to move forward.
- b. The Company has not performed the described analysis.

Witness: Brian K. West

