

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

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

**ATTORNEY GENERAL AND KIUC RESPONSES TO DATA REQUESTS OF
KENTUCKY POWER**

Come now the intervenors, the Attorney General of the Commonwealth of Kentucky, by his Office of Rate Intervention (“Attorney General”) and Kentucky Industrial Utility Customers (“KIUC”), and provides the attached Responses to Data Requests of Kentucky Power filed on February 22, 2023.

Respectfully submitted,

DANIEL J. CAMERON
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Certificate of Service and Filing

Pursuant to the Commission's Orders and in accord with all other applicable law, Counsel certifies that, on March 8, 2023, an electronic copy of the foregoing was served via the Commission's electronic filing system.

this 8th day of March, 2023.

A handwritten signature in blue ink, appearing to read "J. Michael New". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Assistant Attorney General

Response to Data Requests

1. Provide all schedules, tables, and charts included in the testimony and exhibits to the testimony of Stephen J. Baron in electronic format, with formulas intact and visible, and no pasted values.

RESPONSE:

See attached Public and Confidential files.

RESPONSE PROVIDED BY: Stephen J. Baron

ELECTRONIC TARIFF FILING OF KENTUCKY POWER COMPANY FOR APPROVAL OF A
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2. Provide all workpapers, source documents, and electronic spreadsheets used in the development of Mr. Baron's testimony. The requested information, if so available, should be provided in an electronic format, with formulas intact and visible, and no pasted values.

RESPONSE:

See response to Question 1.

RESPONSE PROVIDED BY: Stephen J. Baron

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3. Please identify by name all current members of KIUC and each of the industries in which each member operates and/or competes.

RESPONSE:

AAK, USA K2, LLC
AGC Automotive Americas Co.
Air Liquide Industrial U.S. LP
Air Products and Chemicals, Inc.
Alliance Coal, LLC
Carbide Industries LLC
Century Aluminum
Commonwealth Rolled Products, Inc.
Corning Incorporated
Domtar Paper Co. LLC
Dow Silicones Corporation
Ford Motor Company
Ingevity
JBS USA LLC (JBS Pork)
Kimberly-Clark Corporation
Marathon Petroleum Company LP
North American Stainless
Nucor Steel Gallatin
Schneider Electric USA
The Chemours Company FC, LLC
Toyota Motor Manufacturing, Kentucky, Inc.

RESPONSE PROVIDED BY: Counsel

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4. Please identify all proceedings in the past 10 years in which Mr. Baron supported a special contract for a new electric utility customer.

RESPONSE:

Mr. Baron has reviewed his exhibit SJB-1. He has testified in 115 cases since February 2013 (past 10 years). Based on his review of SJB-1 and a sample review of his testimony, Mr. Baron has not identified any proceedings in which he has provided testimony in support of a special contract for a new electric utility customer. Mr. Baron has not reviewed each of his pre-filed testimonies in each of the 115 cases he has testified in the past 10 years. Copies of the public version of each of these testimonies is available on the respective regulatory commission website.

Notwithstanding this, Mr. Baron has supported market access rates/market-based rates for large industrial customers. This testimony was not in support of any specific new customer or new load, but rather as a general position in support of this type of rate.

RESPONSE PROVIDED BY: Stephen J. Baron

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5. Please identify all proceedings in the past 10 years in which Mr. Baron supported electric utility economic development rate discounts.

RESPONSE:

Mr. Baron has reviewed his exhibit SJB-1. He has testified in 115 cases since February 2013 (past 10 years). Mr. Baron has not reviewed each of his pre-filed testimonies in each of the 115 cases he has testified in the past 10 years, but has review a sample of these testimonies. Copies of the public version of each of his testimonies in these 115 cases is available on the respective regulatory commission website.

Notwithstanding this, as a general matter Mr. Baron supports economic development rate discounts that are beneficial to a utility's service area and do not harm other customers on the system. For example, in Appalachian Power Company/Wheeling Power Company Case No. 19-0387, Mr. Baron addressed the Companies' funding for an Economic Development Rate and also discussed general benefits that can be provided by retaining customers who might otherwise leave a utility system absent economic development incentives.

RESPONSE PROVIDED BY: Stephen J. Baron

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6. Please identify all proceedings in the past 10 years in which Mr. Baron supported a special contract for electricity for a new data center load.

RESPONSE:

Mr. Baron has not previously supported a special contract for electricity for a new data center load in a proceeding.

RESPONSE PROVIDED BY: Stephen J. Baron

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7. Please confirm that an increase in Kentucky Power's total load results in lower fixed costs for all customers. If your response is anything other than an unqualified confirmation, please explain in detail your basis for not confirming.

RESPONSE:

Mr. Baron cannot confirm this statement. If the revenues paid by customers causing the new load are less than the incremental cost of serving the new load, this would result in a net increase in costs to existing customers. In this case, there would not be a reduction in fixed costs. For example, if a utility incurred additional fixed costs to serve the new load and the customer's revenues were not sufficient to cover the incremental variable costs and incremental fixed costs, then the fixed costs for all customers would not decrease on a per unit (e.g., kWh or kW) basis.

RESPONSE PROVIDED BY: Stephen J. Baron