

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

In the Matter of:

Electronic Tariff Filing Of Kentucky Power Company )  
For Approval Of A Special Contract With Ebon ) Case No. 2022-00387  
International, LLC )

**Kentucky Power Company’s Initial Data Requests to Joint Intervenors**

Pursuant to the Commission’s Order dated November 23, 2022, Kentucky Power Company propounds the following data requests to be answered by Mountain Association, Kentuckians For The Commonwealth, Appalachian Citizens’ Law Center, Sierra Club, and Kentucky Resources Council, Inc. (collectively, “Joint Intervenors”):

**DEFINITIONS**

- “Document” means the original and all copies (regardless of origin and whether or not including additional writing thereon or attached thereto) of memoranda, reports, books, manuals, instructions, directives, records, forms, notes, letters, notices, confirmations, telegrams, pamphlets, notations of any sort concerning conversations, telephone calls, meetings or other communications, bulletins, transcripts, diaries, analyses, summaries, correspondence investigations, questionnaires, surveys, worksheets, and all drafts, preliminary versions, alterations, modifications, revisions, changes, amendments and written comments concerning the foregoing, in whatever form, stored or contained in or on whatever medium, including computerized memory or magnetic media.
- “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.
- “Person” means any natural person, corporation, professional corporation, partnership, association, joint venture, proprietorship, firm, or the other business enterprise or legal entity.
- A request to identify a natural person means to state his or her full name and residence address, his or her present last known position and business affiliation at the time in question.

- 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.), number of code number thereof or other means of identifying it, and its present location and custodian. If any such document was, but is no longer in Joint Intervenors' possession or subject to its control, state what disposition was made of it.
- 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.
- "Identify" used in a fashion other than as described above means to provide in detail, including all assumptions, bases, facts considered, and rationale if not called for in another part of the data request, the requested information.
- "And" and "or" should be considered to be both conjunctive and disjunctive, unless specifically stated otherwise.
- "Each" and "any" should be considered to be both singular and plural, unless specifically stated otherwise.
- 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.
- "You" or "your" means the person whose filed testimony is the subject of these interrogatories 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 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.
- "Company" means Kentucky Power Company.
- "AEP" means American Electric Power Company, Inc.
- "Joint Intervenors" means each of Mountain Association, Kentuckians For The Commonwealth, Appalachian Citizens' Law Center, Sierra Club, and Kentucky Resources Council, Inc. individually or any combination thereof.

## 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 interrogatories are continuing in nature, and, without regard to the date created or obtained, 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 Kentucky Power. Any studies, evaluations, analyses, 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 interrogatory 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.
8. Please furnish any non-disclosure or other required for disclosure of any information or response for which confidential treatment provided.

## **DATA REQUESTS**

1. Provide all schedules, tables, and charts included in the testimony and exhibits to the testimony of Stacy L. Sherwood in electronic format, with formulas intact and visible, and no pasted values.
2. Provide all workpapers, source documents, and electronic spreadsheets used in the development of Ms. Sherwood's testimony. The requested information, if so available, should be provided in an electronic format, with formulas intact and visible, and no pasted values.
3. Provide all schedules, tables, and charts included in the testimony and exhibits to the testimony of Chelsea Hotaling in electronic format, with formulas intact and visible, and no pasted values.
4. Provide all workpapers, source documents, and electronic spreadsheets used in the development of Ms. Hotaling's testimony. The requested information, if so available, should be provided in an electronic format, with formulas intact and visible, and no pasted values.
5. Please identify all proceedings in the past 10 years in which Ms. Hotaling supported a special contract for an electric utility customer.
6. Please identify all proceedings in the past 10 years in which Ms. Hotaling supported electric utility economic development rate discounts.
7. Please identify all proceedings in the past 10 years in which Ms. Hotaling supported a special contract for electricity for a new data center load.
8. Please identify all proceedings in the past 10 years in which Ms. Sherwood supported a special contract for an electric utility customer.
9. Please identify all proceedings in the past 10 years in which Ms. Sherwood supported electric utility economic development rate discounts.
10. Please identify all proceedings in the past 10 years in which Ms. Sherwood supported a special contract for electricity for a new data center load.
11. Please identify whether Ms. Sherwood has any experience developing data centers or blockchain data computing complexes.
12. Please identify whether Ms. Hotaling has any experience developing data centers or blockchain data computing complexes.
13. Please describe Ms. Sherwood's professional experience and expertise, if any, related to cryptomining and cryptocurrencies. Please identify all proceedings related to cryptomining and cryptocurrencies in which Ms. Sherwood has appeared as a witness.

14. Please describe Ms. Hotaling's professional experience and expertise, if any, related to cryptomining and cryptocurrencies. Please identify all proceedings related to cryptomining and cryptocurrencies in which Ms. Hotaling has appeared as a witness.
15. Refer to page 10 of Ms. Sherwood's Testimony. Please provide the size of each prospective customer's load in each bullet-point example.
16. Refer to the following statement on page 18 of Ms. Sherwood's Testimony: "Even though Ebon has asserted that it is using a local recruiter to fulfill the positions it has identified, the proposed Special Contract does not require Ebon to hire any local residents for any jobs in exchange for the discounts from KPCO. As such, it's unclear what the level of economic impact the Ebon facility would have on the local or state economy." This statement implies that hiring only local residents for jobs provides economic benefit to the local or state economy.
  - a. If you do not agree that this statement makes such an implication, please state in detail why not.
  - b. Regardless of your response to part (a), please explain in detail how hiring non-local residents does not provide any local or state economic benefit.
17. 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.
18. Please confirm that Joint Intervenors are recommending that the Commission reject the Ebon Special Contract because addition of Ebon's 250MW industrial load forecloses the potential opportunity to reduce the price of power through hypothetical energy efficiency matters (the DRIPE effect).
19. Please refer to Kentucky Power's February 2, 2023 Supplemental Response to Joint Intervenors' data request 1-6; Kentucky Power's February 2, 2023 Supplemental Response Joint Intervenors' data request 2-2; and pages 5 and 16 of Ms. Sherwood's Testimony. Please identify each fact in evidence supporting the statement that Ebon has currently applied for such tax relief.
20. Please explain whether Joint Intervenors believe that Ebon's proposed facility is limited to the production of cryptocurrencies that Ms. Sherwood states suffer from market volatility.

Respectfully submitted,



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