

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

In the matter of: :

ELECTRONIC JOINT APPLICATION OF KENTUCKY : CASE NO. 2022-00402
UTILITIES COMPANY AND LOUISVILLE GAS AND :
ELECTRIC COMPANY FOR CERTIFICATES OF
PUBLIC CONVENIENCE AND NECESSITY AND SITE :
COMPATIBILITY CERTIFICATES AND APPROVAL :
OF A DEMAND SIDE MANAGEMENT PLAN AND :
APPROVAL OF FOSSIL FUEL-FIRED GENERATING :
UNIT RETIRMENTS :

**RESPONSE OF THE KENTUCKY COAL ASSOCIATION, INC.
TO THE JOINT DATA REQUESTS
OF
KENTUCKY UTILITIES COMPANY
AND
LOUISVILLE GAS AND ELECTRIC COMPANY
DATED JULY 28, 2023**

Filed: August 4, 2023

VERIFICATION

STATE OF Pennsylvania)
COUNTY OF Allegheny)

The undersigned, Emily Medine, being duly sworn, deposes and says that she is a Principal with the firm Energy Ventures Analysis, Inc., an energy consultancy, and an expert witness on behalf of the Kentucky Coal Association, Inc. in Case No. 2022-00402 before the Commission and that she has personal knowledge of the matters set forth in the foregoing responses for which she is a witness, and that the information and answers contained therein are true and correct to the best of her information, knowledge, and belief.

Emily Medine
Emily Medine

Subscribed and sworn to before me, a Notary Public in and before said County and State, this 4th day of August 2023.

Christine L. Fedzen
Notary Public
Notary Public ID No. 1048512

My Commission Expires:

Commonwealth of Pennsylvania - Notary Seal
Christine L. Fedzen, Notary Public
Allegheny County
My commission expires February 28, 2027
Commission number 1048512

Member, Pennsylvania Association of Notaries

KENTUCKY COAL ASSOCIATION, INC.

**Response to Joint Data Requests of
Kentucky Utilities Company
and
Louisville Gas and Electric Company
Dated July 28, 2023**

Case No. 2022-00402

Request No. 1

Responding Witness: Emily Medine

Request No. 1: Attachment ESM-1 at page 2 states, “Ms. Medine prepares analyses and testimony in support of clients involved in regulatory and legal proceedings. She provides testimony in commission hearings on fuel procurement issues and arbitration proceedings on contract disputes and damages. Ms. Medine regularly speaks at industry meetings.”

- a. Please provide a complete list of every engagement where Ms. Medine has prepared analyses and testimony in support of clients involved in regulatory and legal proceedings, including every case or docket, jurisdiction, name of the client she represented and a copy of the analysis or testimony.
- b. Please provide a complete list of each and every engagement where Ms. Medine has prepared testimony or analysis in connection with the representation of a coal company or coal industry association, including the scope of the engagement, the forum, if any, where Ms. Medine provided any testimony or analysis and a copy of any such testimony or analysis.
- c. Please provide a complete list of every occasion where Ms. Medine has spoken at industry meetings, including the date and location of the meeting, the name of the industry meeting and a copy of her presentation or remarks.

Response No. 1: Ms. Medine has not maintained records that are specifically responsive to this request. Provided below is a list of Ms. Medine’s testimony in proceedings in front of regulatory commissions in Indiana, West Virginia, and Ohio. A partial list of other proceedings in which Ms. Medine has been involved is also provided.

Testimony Before the Indiana Utility Regulatory Commissions (IURC)

Testimony can be found by going to <https://iurc.portal.in.gov/advanced-search/> and searching under Cause Number.

1. JOINT PETITION BY THE INDIANA FINANCE AUTHORITY ("AUTHORITY") AND INDIANA GASIFICATION, LLC ("INDIANA GASIFICATION") FOR THE INDIANA UTILITY REGULATORY COMMISSION TO (1) APPROVE A SUBSTITUTE NATURAL GAS

IN Utility Regulatory Commission Decisions | Nov 22, 2011 | 2011 Ind. PUC LEXIS 345 | CAUSE NO. 43976

2. PETITION OF NORTHERN INDIANA PUBLIC SERVICE COMPANY LLC PURSUANT TO IND. CODE §§ 8-1-2-42.7, 8-1-2-61 AND, IND. CODE § 8- 1-2.5-6 FOR (1) AUTHORITY TO MODIFY ITS RATES AND CHARGES FOR ELECTRIC UTILITY

IN Utility Regulatory Commission Decisions | Dec 04, 2019 | 2019 IND. PUC LEXIS 469 | CAUSE NO. 45159

3. PETITION OF NORTHERN INDIANA PUBLIC SERVICE COMPANY LLC PURSUANT TO IND. CODE §§ 8-1-2-42.7, 8-1-2-61 AND, IND. CODE § 8- 1-2.5-6 FOR (1) AUTHORITY TO MODIFY ITS RATES AND CHARGES FOR ELECTRIC UTILITY

IN Utility Regulatory Commission Decisions | Dec 04, 2019 | 2019 IND. PUC LEXIS 497 | CAUSE NO. 45159

4. VERIFIED PETITION OF SOUTHERN INDIANA GAS AND ELECTRIC COMPANY d/b/a CENTERPOINT ENERGY INDIANA SOUTH ("CENTERPOINT") FOR AN ORDER: (1) ISSUING CENTERPOINT A CERTIFICATE OF PUBLIC CONVENIENCE AND NECESSITY

IN Utility Regulatory Commission Decisions | Oct 27, 2021 | 2021 IND. PUC LEXIS 257 | CAUSE NO. 45501

5. APPLICATION OF SOUTHERN INDIANA GAS AND ELECTRIC COMPANY D/B/A VECTREN ENERGY DELIVERY OF INDIANA, INC. ("VECTREN SOUTH") FOR APPROVAL OF A CHANGE IN ITS FUEL COST ADJUSTMENT FOR ELECTRIC SERVICE IN ACCORDANCE

IN Utility Regulatory Commission Decisions | Mar 07, 2012 | 2012 Ind. PUC LEXIS 83
| CAUSE NO. 38708 FAC 91 S1

6. VERIFIED JOINT PETITION OF NORTHERN INDIANA PUBLIC SERVICE COMPANY LLC ("NEPSCO") AND ROSEWATER WIND GENERATION LLC (THE "JOINT VENTURE") FOR (1) ISSUANCE TO NEPSCO OF A CERTIFICATE OF PUBLIC CONVENIENCE

IN Utility Regulatory Commission Decisions | Aug 07, 2019 | 2019 IND. PUC LEXIS 197 | CAUSE NO. 45194

7. VERIFIED JOINT PETITION OF NORTHERN INDIANA PUBLIC SERVICE COMPANY LLC ("NEPSCO") AND ROSEWATER WIND GENERATION LLC (THE "JOINT VENTURE") FOR (1) ISSUANCE TO NEPSCO OF A CERTIFICATE OF PUBLIC CONVENIENCE

IN Utility Regulatory Commission Decisions | Aug 07, 2019 | 2019 IND. PUC LEXIS 254 | CAUSE NO. 45194

8. PETITION OF SOUTHERN INDIANA GAS AND ELECTRIC COMPANY d/b/a VECTREN ENERGY DELIVERY OF INDIANA, INC. ("PETITIONER") FOR APPROVAL OF AND AUTHORITY FOR (1) AN INCREASE IN ITS RATES AND CHARGES FOR ELECTRIC

IN Utility Regulatory Commission Decisions | Apr 27, 2011 | 2011 Ind. PUC LEXIS 115 | CAUSE NO. 43839

9. VERIFIED PETITION OF SOUTHERN INDIANA GAS AND ELECTRIC COMPANY d/b/a VECTREN ENERGY DELIVERY OF INDIANA, INC. ("VECTREN SOUTH") FOR (1) ISSUANCE OF A CERTIFICATE OF PUBLIC CONVENIENCE AND NECESSITY FOR

IN Utility Regulatory Commission Decisions | Apr 24, 2019 | 2019 Ind. PUC LEXIS 100 | CAUSE NO. 45052

10. VERIFIED PETITION OF NORTHERN INDIANA PUBLIC SERVICE COMPANY LLC FOR APPROVAL PURSUANT TO IND. CODE §§ 8-1-2- 42(a), 8-1-8.8-11, AND TO THE EXTENT NECESSARY IND. CODE § 8-1-2.5-6, OF A RENEWABLE ENERGY

IN Utility Regulatory Commission Decisions | Jun 05, 2019 | 2019 Ind. PUC LEXIS 127 | CAUSE NO. 45195

11. VERIFIED PETITION OF NORTHERN INDIANA PUBLIC SERVICE COMPANY LLC FOR APPROVAL PURSUANT TO IND. CODE §§ 8-1-2- 42(a), 8-1-8.8-11, AND TO THE EXTENT NECESSARY IND. CODE § 8-1-2.5-6, OF RENEWABLE ENERGY POWER

IN Utility Regulatory Commission Decisions | Jun 05, 2019 | 2019 Ind. PUC LEXIS 128 | CAUSE NO. 45196

12. APPLICATION OF SOUTHERN INDIANA GAS AND ELECTRIC COMPANY D/B/A VECTREN ENERGY DELIVERY OF INDIANA, INC. ("VECTREN SOUTH") FOR APPROVAL OF A CHANGE IN ITS FUEL COST ADJUSTMENT FOR ELECTRIC SERVICE IN ACCORDANCE

IN Utility Regulatory Commission Decisions | Apr 24, 2013 | 2013 Ind. PUC LEXIS 134 | CAUSE NO. 38708 FAC 98

13. PETITION OF SOUTHERN INDIANA GAS AND ELECTRIC COMPANY D/B/A CENTERPOINT ENERGY INDIANA SOUTH PURSUANT TO INDIANA CODE CH. 8-1-40.5 FOR (1) AUTHORITY TO (A) ISSUE SECURITIZATION BONDS; (B) COLLECT SECURITIZATION

IN Utility Regulatory Commission Decisions | Jan 04, 2023 | 2023 IND. PUC LEXIS 4 | CAUSE NO. 45722

14. APPLICATION OF SOUTHERN INDIANA GAS AND ELECTRIC COMPANY D/B/A VECTREN ENERGY DELIVERY OF INDIANA, INC. ("VECTREN SOUTH") FOR APPROVAL OF A CHANGE IN ITS FUEL COST ADJUSTMENT FOR ELECTRIC SERVICE IN ACCORDANCE

IN Utility Regulatory Commission Decisions | Jul 28, 2010 | 2010 Ind. PUC LEXIS 252 | CAUSE NO. 38708 FAC 87

15. APPLICATION OF SOUTHERN INDIANA GAS AND ELECTRIC COMPANY D/B/A VECTREN ENERGY DELIVERY OF INDIANA, INC. ("VECTREN SOUTH") FOR APPROVAL OF A CHANGE IN ITS FUEL COST ADJUSTMENT FOR ELECTRIC SERVICE IN ACCORDANCE

IN Utility Regulatory Commission Decisions | Dec 03, 2014 | 2014 Ind. PUC LEXIS 312 | CAUSE NO. 38708 FAC 102 S1

Testimony Before the West Virginia Public Service Commission

Public Testimony can be accessed by logging into the WV Commission website <https://www.psc.state.wv.us/WebDocket/default.htm>. Enter "Medine" under Activity Summary.

Case Number	Activity Date	Activity Type	Case Name Summary
19-0063-E-PC	04/26/2019	Incoming Document	Appalachian Power Company and Wheeling Power Company Direct Testimony of Emily S. Medine, filed by Counsel for CAD
18-1231-E-ENEC	02/07/2019	Process	Monongahela Power Company and The Potomac Edison Company Confidential filing - Confidential Revised Direct Testimony of Emily S. Medine, filed by Counsel for CAD (Closed Entry)
18-1231-E-ENEC	02/07/2019	Incoming Document	Monongahela Power Company and The Potomac Edison Company Revised Direct Testimony of Emily S. Medine, filed by Counsel for CAD (Closed Entry)
18-1231-E-ENEC	11/05/2018	Process	Monongahela Power Company and The Potomac Edison Company Confidential filing - Confidential Direct Testimony of Emily S. Medine, filed by Counsel for CAD
18-1231-E-ENEC	11/05/2018	Incoming Document	Monongahela Power Company and The Potomac Edison Company Direct Testimony of Emily S. Medine, filed by Counsel for CAD
18-0503-E-ENEC	08/10/2018	Incoming Document	Appalachian Power Company and Wheeling Power Company Motion to Excuse Witness Emily Medine, filed by Counsel for CAD
18-0503-E-ENEC	07/09/2018	Process	Appalachian Power Company and Wheeling Power Company Confidential filing - Direct Testimony of Emily S. Medine, filed by CAD
18-0503-E-ENEC	07/09/2018	Incoming Document	Appalachian Power Company and Wheeling Power Company Public Direct Testimony of Emily S. Medine, filed by CAD
17-0296-E-PC	08/25/2017	Process	Monongahela Power Company and The Potomac Edison Company Confidential filing - Confidential Direct Testimony of Emily S. Medine, filed by Counsel for Consumer Advocate Division
17-0296-E-PC	08/25/2017	Incoming Document	Monongahela Power Company and The Potomac Edison Company Direct Testimony of Emily S. Medine, filed by Counsel for Consumer Advocate Division
17-0631-E-P	08/22/2017	Incoming Document	American Bituminous Power Partners, L.P. and Monongahela Power Company Direct Testimony of Emily S. Medine, filed by Counsel for Consumer Advocate Division
16-1121-E-ENEC	10/27/2016	Process	Monongahela Power Company and The Potomac Edison Company

Confidential filing - Confidential Direct Testimony of Emily S. Medine, filed by Counsel for Consumer Advocate Division

[16-1121-E-ENEC](#) 10/27/2016 Incoming Document View [PDF](#) / [Text](#) / [Download](#)

Monongahela Power Company and The Potomac Edison Company

Direct Testimony of Emily S. Medine, filed by Counsel for Consumer Advocate Division

[16-0239-E-ENEC](#) 08/05/2016 Order View [PDF](#) / [Text](#) / [Download](#)

Appalachian Power Company and Wheeling Power Company

Commission Order granting in part and denying in part various Motions for Protective Treatment filed by the Companies; that on or before 4:00 p.m. on 8/12/2016, the Companies shall make the information that is not entitled to permanent protected treatment available for public review by filing revised versions of the affected testimonies and exhibits as a closed entry; denying the request for the destruction of all copies of the 5/16/2016 testimony of Emily S. Medine; denying the request to delay disclosure of information not entitled to permanent protective treatment until after this Order becomes final and non-appealable; etc. (CLOSED ENTRY)

[16-0239-E-ENEC](#) 05/27/2016 Process

Appalachian Power Company and Wheeling Power Company

Confidential filing - Revised Confidential Version Testimony of Emily S. Medine, filed by CAD

[16-0239-E-ENEC](#) 05/27/2016 Incoming Document View [PDF](#) / [Text](#) / [Download](#)

Appalachian Power Company and Wheeling Power Company

Revised Public Version Testimony of Emily S. Medine, filed by CAD

[16-0239-E-ENEC](#) 05/25/2016 Order View [PDF](#) / [Text](#) / [Download](#)

Appalachian Power Company and Wheeling Power Company

Commission Procedural Order directing Appalachian Power Company and Wheeling Power Company to meet and to discuss Ms. Medine's testimony with the goal of limiting redactions as much as possible; that the Consumer Advocate Division be prepared to file revised testimony for Ms. Medine reflecting the parties' agreement on more limited redactions by close of business, Thursday, 5/26/2016; etc.

[16-0240-E-P](#) 05/25/2016 Order View [PDF](#) / [Text](#) / [Download](#)

Appalachian Power Company and Wheeling Power Company

Commission Procedural Order directing Appalachian Power Company and Wheeling Power Company to meet and to discuss Ms. Medine's testimony with the goal of limiting redactions as much as possible; that the Consumer Advocate Division be prepared to file revised testimony for Ms. Medine reflecting the parties' agreement on more limited redactions by close of business, Thursday, 5/26/2016; etc.

[16-0239-E-ENEC](#) 05/16/2016 Process

Appalachian Power Company and Wheeling Power Company

Confidential filing - Confidential Direct Testimony of Emily Medine, filed by Counsel for Consumer Advocate Division

[16-0239-E-ENEC](#) 05/16/2016 Incoming Document View [PDF](#) / [Text](#) / [Download](#)

Appalachian Power Company and Wheeling Power Company

Direct Testimony of Emily Medine, filed by Counsel for Consumer Advocate Division

[12-0399-E-P](#) 06/15/2012 Order View [PDF](#) / [Text](#) / [Download](#)

Appalachian Power Company and Wheeling Power Company, dba American Electric Power

Commission Procedural Order that the Motion requesting that WVEUG witness, Stephen J. Baron be excused from the June 18-19, 2012 evidentiary hearings scheduled, and that his testimony be admitted by agreement of the parties; that Motion requesting that the SWVA witness, Emily S. Medine, be excused from the June 18-19, 2012 evidentiary hearings scheduled in this proceeding, and that her testimony be admitted by agreement of the parties; etc.

[12-0399-E-P](#) 06/15/2012 Incoming Document View [PDF](#) / [Text](#) / [Download](#)

Appalachian Power Company and Wheeling Power Company, dba American Electric Power

Motion to Excuse Witness Emily S. Medine from hearing starting June 18, 2012, filed by Counsel for SWVA

[12-0399-E-P](#) 06/08/2012 Incoming Document View [PDF](#) / [Text](#) / [Download](#)

Appalachian Power Company and Wheeling Power Company, dba American Electric Power

Direct Testimony - Emily S. Medine, filed by Counsel for SWVA, Inc.
[12-0399-E-P](#) 06/08/2012 Process
 Appalachian Power Company and Wheeling Power Company, dba American Electric Power
 Confidential filing - Confidential Version of the Direct Testimony of Emily S. Medine, filed by Counsel for SWVA

Incoming

[07-0248-E-GI](#) 05/14/2007 Document View [PDF](#) / [Text](#) / [Download](#)
 Appalachian Power Company and Wheeling Power Company
 CAD's Direct Testimony of Byron L. Harris, and Emily S. Medine's Direct Testimony (filed under seal)

Activity List (53 records)		Sort By		Activity Date <input type="text"/>
Case Number	Activity Date	Activity Type		
Case Name				
Summary				
22-0793-E-ENEC	12/08/2022	Process	Monongahela Power Company and The Potomac Edison Company Confidential filing - Direct Testimony of Emily S. Medine, filed by CAD	
22-0793-E-ENEC	11/14/2022	Process	Monongahela Power Company and The Potomac Edison Company Confidential filing-Confidential Direct Testimony of Emily S. Medine, filed by CAD	
22-0793-E-ENEC	11/14/2022	Incoming Document	View PDF / Download Monongahela Power Company and The Potomac Edison Company Direct Testimony of Emily S. Medine, filed by CAD	
22-0393-E-ENEC	10/04/2022	Process	Appalachian Power Company and Wheeling Power Company Confidential filing - Direct Testimony of Emily S. Medine, filed by Counsel for CAD	
22-0393-E-ENEC	09/23/2022	Incoming Document	View PDF / Text / Download Appalachian Power Company and Wheeling Power Company Rebuttal Testimony of Emily S. Medine, filed by Counsel for CAD	
22-0393-E-ENEC	09/09/2022	Process	Appalachian Power Company and Wheeling Power Company Confidential filing - Direct Testimony of Emily S. Medine, filed by Counsel for CAD	
22-0393-E-ENEC	09/09/2022	Incoming Document	View PDF / Text / Download Appalachian Power Company and Wheeling Power Company Direct Testimony of Emily S. Medine, filed by Counsel for CAD	
21-0857-E-CN	07/18/2022	Incoming Document	View PDF / Text / Download Monongahela Power Company and The Potomac Edison Company Direct Testimony of Emily S. Medine, filed by Counsel for CAD	
21-0810-E-PC	04/07/2022	Process	Appalachian Power Company and Wheeling Power Company Confidential filing - CAD Exhibit ESM-D entered in the 4/7/2022 hearing - Confidential Direct Testimony of Emily S. Medine	
21-0810-E-PC	03/28/2022	Process	Appalachian Power Company and Wheeling Power Company Confidential filing - Confidential Direct Testimony of Emily S. Medine, filed by CAD	

21-0810-E-PC	03/28/2022	Incoming Document	View PDF / Text / Download
Appalachian Power Company and Wheeling Power Company Direct Testimony of Emily S. Medine, filed by CAD			
21-0339-E-ENEC	03/21/2022	Incoming Document	View PDF / Text / Download
Appalachian Power Company and Wheeling Power Company Supplemental Direct Testimony of Emily S. Medine on behalf of CAD, filed by Counsel for CAD			
21-0658-E-ENEC	03/21/2022	Incoming Document	View PDF / Text / Download
Monongahela Power Company and The Potomac Edison Company Supplemental Direct Testimony of Emily S. Medine on Behalf of the CAD, filed by Counsel for CAD			
21-0658-E-ENEC	12/03/2021	Process	
Monongahela Power Company and The Potomac Edison Company Confidential filing - Confidential Direct Testimony of Emily S. Medine, filed by CAD			
21-0658-E-ENEC	11/12/2021	Process	
Monongahela Power Company and The Potomac Edison Company Confidential filing - Confidential Direct Testimony of Emily S. Medine, filed by CAD			
21-0658-E-ENEC	11/12/2021	Incoming Document	This is a large filing. Consider using the "download" option. View PDF / Text / Download
Monongahela Power Company and The Potomac Edison Company Public Direct Testimony of Emily S. Medine, filed by CAD			
20-0675-E-PC	09/28/2021	Incoming Document	View PDF / Text / Download
Appalachian Power Company and Wheeling Power Company Direct Testimony of Emily S. Medine, filed by CAD			
21-0339-E-ENEC	07/30/2021	Process	
Appalachian Power Company and Wheeling Power Company Confidential filing of Emily S. Medine Testimony, Exhibit CAD-ESM-D			
21-0339-E-ENEC	07/07/2021	Process	
Appalachian Power Company and Wheeling Power Company Confidential filing - Confidential Direct Testimony of Emily S. Medine, filed by CAD			
21-0339-E-ENEC	07/07/2021	Incoming Document	View PDF / Text / Download
Appalachian Power Company and Wheeling Power Company Direct Testimony of Emily S. Medine, filed by CAD			
20-1040-E-CN	05/06/2021	Incoming Document	This is a large filing. Consider using the "download" option. View PDF / Text / Download
Appalachian Power Company and Wheeling Power Company Public Direct Testimony of Emily S. Medine, filed by Counsel for CAD			
20-1040-E-CN	05/06/2021	Process	
Appalachian Power Company and Wheeling Power Company Confidential filing - Confidential Direct Testimony of Emily S. Medine, filed by Counsel for CAD			
19-1028-E-PC	12/09/2019	Incoming Document	View PDF / Text / Download
Monongahela Power Company and The Potomac Edison Company Rebuttal Testimony of Emily S. Medine, filed by Counsel for CAD			
19-1028-E-PC	12/03/2019	Incoming Document	View PDF / Text / Download
Monongahela Power Company and The Potomac Edison Company Direct Testimony of Emily S. Medine, filed by CAD			
19-0063-E-PC	04/26/2019	Process	
Appalachian Power Company and Wheeling Power Company Confidential filing - Confidential Direct Testimony of Emily S. Medine, filed by Counsel for CAD			

Activity List (53 records)		Sort By	Activity Date
Case Number	Activity Date	Activity Type	Case Name Summary
06-0960-E-42T	01/22/2007	Incoming Document	This is a large filing. Consider using the "download" option. View PDF / Text / Download Monongahela Power Company and The Potomac Edison Company, both dba Allegheny Power Direct Testimony of Bryon L. Harris, Randall R. Short and Michael J. Majoros filed by CAD; Direct Testimony of Emily S. Medine filed under Seal
06-1426-E-D	01/22/2007	Incoming Document	This is a large filing. Consider using the "download" option. View PDF / Text / Download Monongahela Power Company and The Potomac Edison Company, both dba Allegheny Power Direct Testimony of Bryon L. Harris, Randall R. Short and Michael J. Majoros filed by CAD; Direct Testimony of Emily S. Medine filed under Seal
05-1278-E-PC-PW-42T	03/08/2006	Incoming Document	This is a large filing. Consider using the "download" option. View PDF / Text / Download Appalachian Power Company and Wheeling Power Company, both dba American Electric Power Direct Testimony of Byron L. Harris, Randall R. Short, Emily S. Medine and Ralph Smith filed on behalf of the CAD

Testimony Before the Public Utilities Commission of Ohio (PUCO)

Public Testimony can be accessed by logging into the PUCO docketing information system (DIS) <https://dis.puc.state.oh.us/FulltextSearch.aspx> and do a document records search under Medine

(15 Results)

Date Filed	Summary	Pages
01/02/2019	Document Summary: Direct Testimony of Emily S. Medine on Behalf of the Ohio Coal Association (OCA) electronically filed by John F Stock on behalf of Ohio Coal Association.	58
03/29/2017	Document Summary: Notice of Joinder and Adoption of Direct Testimony of Emily S. Medine, Principal, Energy Ventures Analysis, Inc. by UWUA Local 175 electronically filed by Mr. John R. Doll on behalf of Utility Workers Union of America Local 175	4
03/29/2017	Document Summary: Notice of Joinder and Adoption of Direct Testimony of Emily S. Medine, Principal, Energy Ventures Analysis, Inc. by the Citizens to Protect DP&L Jobs electronically filed by John F Stock on behalf of Citizens to Protect DP&L Jobs.	4
03/29/2017	Document Summary: Certificate of Service of Direct Testimony of Emily S. Medine, Principal, Energy Ventures Analysis, Inc. on Behalf of Murray Energy Corporation electronically filed by John F Stock on behalf of Murray Energy Corporation.	3
03/29/2017	Document Summary: Direct Testimony of Emily S. Medine, Principal, Energy Ventures Analysis, Inc. on Behalf of Murray Energy Corporation electronically filed by John F Stock on behalf of Murray Energy Corporation	38
03/28/2017	Document Summary: Notice of Deposition of Emily Medine electronically filed by Mr. Tony G. Mendoza on behalf of Sierra Club.	5
03/01/2017	Document Summary: Notice of Joinder and Adoption of Direct Testimony of Emily S. Medine, Principal, Energy Ventures Analysis, Inc. by The Citizens to Protect DP&L Jobs electronically filed by John F. Stock on behalf of Citizens to Protect DP&L Jobs.	4

<u>03/01/2017</u>	Document Summary: Certificate of Service of Direct Testimony of Emily S. Medine, Principal, Energy Ventures Analysis, Inc. on Behalf of Murray Energy Corporation electronically filed by John F Stock on behalf of Murray Energy Corporation.	3
<u>03/01/2017</u>	Document Summary: Direct Testimony of Emily S. Medine, Principal, Energy Ventures Analysis, Inc. on Behalf of Murray Energy Corporation electronically filed by John F. Stock on behalf of Murray Energy Corporation.	34
<u>05/07/2012</u>	Document Summary: Direct testimony of Emily S. Medine filed on behalf of PUCO Staff.	32
<u>04/29/2011</u>	Document Summary: Confidential document target for report filed on behalf of Energy Ventures Analysis, Inc. by E. Medine.	1
<u>05/19/2010</u>	Document Summary: Correspondence stating that the case number for Ohio Power Company was inadvertently left off for the Management Performance and Financial Audits of the FAC, corrected title pages are submitted in this filing filed by E. Medine.	3
<u>10/31/2008</u>	Document Summary: Confidential Document Target for direct testimony of Emily S. Medine filed by M. Grady on behalf of OCC. (64)	1
<u>10/31/2008</u>	Document Summary: Public version of direct testimony of Emily S. Medine on behalf of the Office of the Ohio Consumers' Counsel by M. R. Grady.	64
<u>10/31/2008</u>	Document Summary: Motion for protective order and memorandum in support regarding portions of the testimony and certain exhibits of Emily Medine by The Office of the Ohio Consumers' Counsel by M. R. Grady.	10

Partial List of Other Expert Testimony (Client Underlined)

Before the Virginia Corporation Commission on behalf of the West Virginia Coal Association.
Description: Provided expert testimony related to Case No. PUR-2022-00001 in support of Appalachian Power's petition for approval of ELG expenditures at the Amos and Mountaineer power plants.

Before the Public Service Commission of Ohio (PUCO) on behalf of the Ohio Coal Association.
Description: Provided expert testimony related to Case Nos. 15-501-EL-FOR, 18-1392-EL-RDR, and 18-1393-EL-ATA

Before the Michigan Public Service Commission on Consumers Energy Integrated Resource Plan (IRP) on behalf of Midland Cogeneration Ventures (Case U-20165)
Description: Provided comments on the IRP on behalf of MCV

Xcoal Energy & Resources v Southern Coal Sales, et al, U.S. District Court for the District of Delaware, C.A. Nos. 14-cv-459-LPS and 15-267-cv-LPS
Description: Provided expert testimony on the lost margin a result of the alleged failure of Xcoal to purchase shipments under a coal supply agreement between the parties.

Blue Mountain Energy (BME) v the Internal Revenue Service (IRS). Refund Suit in the U.S. District Court for the District of Utah.
Description: Engaged by the Department of Justice representing the IRS to file expert testimony in a complaint filed by BME which asserted incorrect assessment of its Coal Excise Tax.

Capitol Sales, LLC v. Archer Daniels Midland Company, Arbitration under Judicial Arbitration and Mediation Services, Chicago, IL

Description: Provided expert testimony regarding key contract terms

Before the Public Utilities Commission of Ohio (PUCO) on behalf of the PUCO Staff, FAC Application of Columbus Southern Power and Ohio Power (Case Nos. 11-281-EL-FAC and 10-871-EL-EFC)

Description: Testifying as management/performance auditor on fuel procurement practices.

Before the Public Utilities Commission of Ohio (PUCO) on behalf of the PUCO Staff, Fuel and Purchased Power Rider of The Dayton Power & Light Company (Case No. 12-2881-EL-FAC)

Description: Testifying as management/performance auditor on fuel procurement practices.

Duke Energy Industrial Sales, LLC et al vs. Massey Coal Sales Company, Inc., (US) the United States District Court for the Southern District of West Virginia (pending)

Description: Contract dispute. Testifying on industry practice with respect to sales contracts.

Before the Public Utilities Commission of Ohio (PUCO) on behalf of the PUCO Staff, FAC Application of Columbus Southern Power and Ohio Power (Case Nos. 11-281-EL-FAC)

Description: Testifying as management/performance auditor on fuel procurement practices.

Before the Public Utilities Commission of Ohio (PUCO) on behalf of the PUCO Staff, Fuel and Purchased Power Rider of The Dayton Power & Light Company (Case No. 11-5730-EL-FAC)

Description: Testifying as management/performance auditor on fuel procurement practices.

Before the Public Utilities Commission of Ohio (PUCO) on behalf of the PUCO Staff, in the Matter of the Commission Review of the Capacity Charges of Ohio Power Company and Columbus Southern Power Company (Case No. 10-2929-EL-UNC)

Description: Testifying with respect to market assumptions used to estimate energy credit.

Before the Nova Scotia Utilities and Regulatory Board on behalf of Nova Scotia Power, Inc., Fuel Adjustment Clause.

Description: Testifying on coal procurement practices.

Oaktown Fuels Mine No. 1, LLC vs Hoosier Energy Rural Electric Cooperative, Inc.
Arbitration Proceeding

Description: Testifying as to industry practice regarding price reopener provisions and requirements for good faith negotiation.

Before the Arizona Corporation Commission on behalf of Utilities Division Staff, Application of Tucson Electric Power Company. Docket No. E-01933A-12-0291.

Description: Provided testimony on fuel procurement practices.

Hargreaves Raw Materials Services (Germany) vs Hiller Trading, LLC (US) Arbitration Proceeding in the US.

Description: Testifying over damages related to breach of a metallurgical coke contract.

Before the Public Utilities Commission of Ohio (PUCO) on behalf of the PUCO Staff, FAC Application of Columbus Southern Power and Ohio Power (Case Nos. 10-0872/0873-EL-FAC)

Description: Testifying as management/performance auditor on fuel procurement practices.

Before the Public Utilities Commission of Ohio (PUCO) on behalf of the PUCO Staff, Fuel and Purchased Power Rider of The Dayton Power & Light Company (Case No. 09-1012-EL-FAC)

Description: Testifying as management/performance auditor on fuel procurement practices.

Kisano Trade & Invest Limited vs. Winding Gulf Coal Sales, LLC, U.S. District Court for the Southern District of West Virginia, Civil Action No. 2:09-0804.

Description: Testifying regarding damages related to breach of metallurgical coal contract between Ukraine and U.S. traders.

Before the Public Utilities Commission of Ohio (PUCO) on behalf of the PUCO Staff, FAC Application of Columbus Southern Power and Ohio Power (Case Nos. 09-0872/0873-EL-FAC)

Description: Testifying as management/performance auditor on fuel procurement practices.

Aspen Insurance UK Limited vs. Constellation Energy Group Inc and Constellation Energy Commodities Group Inc. Arbitration in London under the law of England (Settled)

Description: Served as expert in dispute between insurers and Constellation regarding validity of and potential exposure under political risk insurance policy related to a contract between Constellation and an Indonesian coal company. Analysis involved valuation of Indonesian coal supply agreement.

Hiscox Dedicated Corporate Member Limited et al vs. Constellation Energy Group Inc and Constellation Energy Commodities Group Inc. Arbitration in London under the law of England (Settled)

Description: Served as expert in dispute between insurers and Constellation regarding validity of and potential exposure under political risk insurance policy related to a contract between Constellation and an Indonesian coal company. Analysis involved valuation of Indonesian coal supply agreement.

Speeches

Ms. Medine is a regular speaker at industry meetings. She does not prepare a formal speech for these events. The following is a partial list of events at which she has spoken on one more occasion(s):

- American Coal Council
- American Public Power Association
- Eastern Mineral Law Foundation
- IURC – Contemporary Issues
- National Coal Transportation Association
- Office of Surface Mining Reclamation and Enforcement
- Platts events

KENTUCKY COAL ASSOCIATION, INC.

**Response to Joint Data Requests of
Kentucky Utilities Company
and
Louisville Gas and Electric Company
Dated July 28, 2023**

Case No. 2022-00402

Request No. 2

Responding Witness: Emily Medine

Request No. 2: Please provide a complete copy of all testimony (including transcripts of live testimony), interviews, articles, publications, or any other public writings or statements of any kind in which Ms. Medine supported or advocated for any entity's construction or acquisition of any natural gas fired electric generating unit. If a transcript of relevant live testimony, an interview, or other public non-written statement is unavailable, please provide a link to where the video may be found. For each item provided (if any), please state whether Ms. Medine supported or advocated for the relevant entity's construction or acquisition of a natural gas fired electric generating unit to facilitate the retirement of, or in lieu of adding or acquiring, coal-fired generation.

Response No. 2: Ms. Medine considers herself an analyst not an advocate. While in graduate school at Princeton University, she developed a specialization in coal while working at Brookhaven National Laboratory under the direction of a professor from Carnegie Mellon University. She worked in consulting following graduate school and then in the industry for a number of years at Consolidation Coal Company before returning to consulting. Since joining EVA, Ms. Medine has worked as a consultant for hundreds of clients. While much of her work has been coal related, due to her expertise, it was as an analyst not an advocate. On her expert engagement attachment (See Response to Data Request No. 1), Ms. Medine notes she worked for Midland Cogeneration Ventures, a natural gas facility in Michigan, in support of its efforts to continue to operate. With respect to coal, Ms. Medine has testified against a utility's acquisition of a coal plant and in favor of a buyout of a Power Purchase Agreement with a coal-fired power plant that could have resulted in the closure of the plant. Ms. Medine has worked for the Department of Justice in five separate proceedings. She has worked for the Department of the Interior on the development of the Stream Protection Rule. These Federal agencies recognized her expertise and objectivity.

EVA, in which she is a partner, has a considerable number of natural gas clients that receive support in plant development, market analyses, hedging strategies and the like. Ms. Medine directly supports these efforts with clients as appropriate.

The testimony provided by Ms. Medine pointed out clear analytical failures on the part of the Companies in the Companies' CPCN filing.

KENTUCKY COAL ASSOCIATION, INC.

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Case No. 2022-00402

Request No. 3

Responding Witness: Emily Medine

Request No. 3: Ms. Medine's testimony states at page 2, lines 12-14, "The Commission denied the Companies' request for the Declaratory Judgment." Please provide the specific citation to the record in this case containing the support for this assertion.

Response No. 3: The January 6, 2023 Procedural Order states the following on pages 3-4:

In the application, LG&E/KU requested a declaratory Order that four solar PPAs do not require prior Commission approval under KRS 278.020 or KRS 278.300. Relevant here, KRS 278.300(2) provides that the Commission must adjudicate an application for authority to issue an evidence of indebtedness within 60 days of the date that the application was filed. KRS 278.300(2) also provides that the Commission can continue its review of the application for longer than 60 days upon a showing of good cause. Although LG&E/KU request an Order that KRS 278.300 does not apply to the PPAs, the Commission must address the legal effect of the statutory deadline if the Commission determines that the four solar PPAs do require prior Commission approval under KRS 278.300.

Based upon a review of the application, the Commission finds that an investigation is necessary, and that, due to the complexity of issues presented, the investigation cannot be completed by March 7, 2023, which is 60 days from the date the application is deemed filed. For that reason, the Commission finds that good cause exists to continue the application beyond the 60-day period specified in KRS

278.300(2) so that the Commission can conduct a thorough review of the proposed transaction.

KENTUCKY COAL ASSOCIATION, INC.

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and
Louisville Gas and Electric Company
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Case No. 2022-00402

Request No. 4

Responding Witness: Emily Medine

Request No. 4: Ms. Medine’s testimony states at page 8, line 26, “The Companies’ analyses misstate the costs for solar energy ” Please explain in detail how and to what extent [t]he Companies’ analyses misstate the costs for solar energy.” Provide any support for the assertion that the costs for solar energy are misstated in the Companies’ analyses.

Response No. 4: Ms. Medine’s comments reflect her review of the agreements. The Companies’ response to Staff’s Question No. 27 from its First Request for Information Confirms that pricing under three of the four solar PPA’s was not firm at the time of the Filing.

KENTUCKY COAL ASSOCIATION, INC.

**Response to Joint Data Requests of
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Case No. 2022-00402

Request No. 5

Responding Witness: Emily Medine

Request No. 5: Ms. Medine's testimony states at page 16, Lines 11-12, "My company EVA estimates that the reclassification would increase the Levelized Cost of Energy ("LCOE" by about 25 percent" and references a document titled, "UNS Electric Inc 2020 Integrated Resource Plan August 26, 2020. Provide the specific citation to UNS Electric Inc 2020 Integrated Resource Plan August 26, 2020 that supports the 25 percent value and any support work papers or reference documents. Please also provide any analysis of the application of this assertion to the Companies in this proceeding.

Response No. 5: The UNS Electric citation is <https://docs.uesaz.com/wp-content/uploads/UNSE-2020-IntegratedResource>. The page number is 76.

The LCOE \$/MWh of baseload CCGT is \$61; the LCOE of intermediate load CCGT is \$72. This difference is about 20 percent.

Ms. Medine's intention was to say that EVA's estimate is about 25 percent and UNS Electric was about 20 percent.

Ms. Medine made clear that this was not dispositive as to what the Companies number would be. It is dispositive that there would a cost difference reflecting the lower denominator, i.e., generation, a poorer heat rate, and increased system costs to replace the lower generation from the CCGT's.

Ms. Medine is not criticizing the Companies for not modelling the CCGTs as intermediate load units. Absent the GHG NSPS, this would not be economic. Ms. Medine was just pointing out the obvious, that if the GHG NSPS is finalized and the Companies plan to comply by operating the CCGTs as intermediate load resources, there is a material cost consequence

that should be considered and disclosed. Absent such disclosure, the regulators have incomplete information to evaluate resource decisions.

KENTUCKY COAL ASSOCIATION, INC.

**Response to Joint Data Requests of
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Case No. 2022-00402

Request No. 6

Responding Witness: Emily Medine

Request No. 6: Please see Ms. Medine's testimony at page 41, Exhibit ESM-8.

- a. Please confirm that Exhibit ESM-8 presents coal prices only in nominal \$/MMBtu, not nominal \$/ton.
- b. Please provide all workpapers for Exhibit ESM-8, including all underlying Excel or similar files with all calculations, inputs, and formulas intact.
- c. Please provide citations and links to the EPA spreadsheets or other data sources Ms. Medine used as the source(s) of the coal prices she converted to nominal \$/MMBtu in Exhibit ESM-8.
- d. Please provide an expanded Exhibit ESM-8 that includes the nominal \$/MMBtu values for the Companies' low gas, mid-CTG coal price forecast for the same years shown in Exhibit ESM-8.

Response No. 6:

- a. The Chart Title mistakenly stated \$/Ton. The columns were correctly labeled \$/MMBtu.
- b. The complete work paper with formulas was included in the Workpapers provided. Also, see Ms. Medine's Response to Data Request No. 8 herein with all Workpapers attached.
- c. The source data is from Table 9 in EPA's updated baseline document which can be found at <https://www.epa.gov/power-sector-modeling/analysis-proposed-greenhouse-gas-standards->

[and-guidelines](#) in Table 9 in [Integrated Proposal Modeling and Updated Baseline Analysis Memo to the Docket \(pdf\)](#) (418.43 KB, July 7, 2023).

KENTUCKY COAL ASSOCIATION, INC.

**Response to Joint Data Requests of
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Case No. 2022-00402

Request No. 7

Responding Witness: Emily Medine

Request No. 7: Provide all workpapers and support documents for Exhibit ESM-3, Generation Forecast by Type at page 19 of Ms. Medine's testimony.

Response No. 7: The file entitled EPA Model Output Summary is the work paper.

KENTUCKY COAL ASSOCIATION, INC.

**Response to Joint Data Requests of
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Case No. 2022-00402

Request No. 8

Responding Witness: Emily Medine

Request No. 8: In Excel spreadsheet or other format, with all formulas, columns and rows unprotected and fully accessible, provide all workpapers and source documents not previously provided.

Response No. 8: Ms. Medine is not aware of other work papers not provided. Note the EPA Model Output Summary Work Paper contains all the modeling results of the updated EPA analysis. This information can be seen by changing the State, Case 1, and Case 2 screens. For clarity's sake, Ms. Medine attaches all public workpapers previously provided by email to all parties to this response. It is noted that Ms. Medine previously also provided the confidential workpapers consistent with KCA's Motion for Confidential Protection dated July 14, 2023 and said confidential workpapers were uploaded to the Companies' HighQ file sharing site on the aforementioned date.

KENTUCKY COAL ASSOCIATION, INC.

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Case No. 2022-00402

Request No. 9

Responding Witness: Emily Medine

Request No. 9: Please refer to the footnote on page 10 of Ms. Medine’s testimony,¹ which states, “It would be useful to include in this analysis the rate impacts on Kentucky Power customers following the closure of the Big Sandy coal plant. According to a July 10, 2023 article in the Lexington Herald, Kentucky Power is asking for an 18.3 percent increase in residential rates.”

- a. Please provide a full citation and link to the cited article.
- b. Please calculate and explain in detail how much of Ms. Medine’s cited request by Kentucky Power for “an 18.3 percent increase in residential rates” results from “the closure of the Big Sandy coal plant,” providing all relevant source documents, workpapers, and other supporting evidence.
- c. Please calculate and explain in detail what change in residential rates Kentucky Power would have requested absent “the closure of the Big Sandy coal plant,” providing all relevant source documents, workpapers, and other supporting evidence.
- d. If Ms. Medine is unable to calculate how much of Kentucky Power’s requested change in residential rates results from “the closure of the Big Sandy coal plant,” please explain what special access to Kentucky Power’s financial records and other relevant information the Companies possess that would allow them to calculate “the rate impacts on Kentucky Power customers following the closure of the Big Sandy coal plant.”

¹ The footnote superscript at the bottom of the page is “55,” which appears to be a typo.

- e. Please explain how it would be “useful” in a rate impact analysis of the Companies’ proposals in this proceeding to “include in this analysis the rate impacts on Kentucky Power customers following the closure of the Big Sandy coal plant.” Please include in your explanation a discussion of all relevant financial, operational, and rate-related differences between the utilities.

Response No. 9:

- a. The correct date is June 30, 2023.
<https://www.kentucky.com/opinion/oped/article276842796.html>
- b. Ms. Medine did not perform that analysis.
- c. Ms. Medine did not perform that analysis.
- d. Ms. Medine is not a residential rate analyst.
- e. Affordability should be a clear mandate to any investment proposed by a regulated utility. Under Senate Bill 4, demonstration of affordability is a requirement to justify the closure of an existing coal plant. Ms. Medine explains in her testimony that the Companies election to ignore rate impacts is inconsistent with this mandate; along with addressing the Companies representation that a Net Present Value analysis is suitable for determining affordability despite admitting that there is considerable intergenerational inequities, i.e., rates will be higher during the first 10 years as a result of these investments. The presumption of lower costs in the “back half” is not justified particularly given (a) PPL’s announced plans to be net zero by 2050 which in theory should result in a shorter depreciation period and (b) EPA’s proposed NSPS for new natural gas plants which will require major new investments or reduced capacity utilization resulting in higher costs per megawatt-hour.

KENTUCKY COAL ASSOCIATION, INC.

**Response to Joint Data Requests of
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and
Louisville Gas and Electric Company
Dated July 28, 2023**

Case No. 2022-00402

Request No. 10

Responding Witness: Emily Medine

Request No. 10: Please refer to Exhibit ESM-2 of Ms. Medine’s testimony.

- a. Does Ms. Medine contend the Commission should disregard the impacts of the Inflation Reduction Act (IRA)?
- b. Please explain the relevance of the “Pre-IRA” modeling results in Exhibit ESM-2 given that the President signed the IRA in August 2022.
- c. Is Ms. Medine aware that EPA’s IPM modeling of its baseline case that accounts for the IRA but does not include the Good Neighbor Plan or the recently proposed greenhouse gas rules shown in the SERC Central Kentucky region over 1,000 MW of coal retirements and over 1,700 MW of new natural gas combined cycle capacity being installed by 2028?²

Response No. 10:

- a. No.
- b. The exhibit was intended to be informative.
- c. The baseline does not include the GHG proposal. It does include the **proposed** Good Neighbor Plan which is included in all

² See “Sensitivity – Air Quality Modeling Base Case + IRA RegionalSummary” Excel file in the “Sensitivity Air Quality Modeling Base Case + IRA” .zip file, available at <https://www.epa.gov/system/files/other-files/2023-03/Sensitivity%20Air%20Quality%20Modeling%20Base%20Case%20%2B%20IRA.zip> (accessed July 23, 2023). The EPA site for its modeling of the final Good Neighbor Plan is “Analysis of the Final Federal Good Neighbor Plan Addressing Regional Ozone Transport for the 2015 Ozone National Ambient Air Quality Standard,” available at <https://www.epa.gov/power-sector-modeling/analysis-final-federal-good-neighbor-plan-addressing-regional-ozone-transport> (accessed July 23, 2023).

cases. The final rule which provides flexibility with respect to the timing, however, has not been modeled in any cases. With respect to any specific results, the EPA analysis should not be relied upon as dispositive of the future generation mix which is relevant given the Companies' inappropriate "reliance" on these results to support their CPCN request.