

**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 UNDER ITS ECONOMIC)	
DEVELOPMENT RIDER AND DEMAND)	CASE NO. 2022-00424
RESPONSE SERVICE TARIFFS WITH CYBER)	
INNOVATION GROUP, LLC)	

**POST-HEARING DATA REQUESTS OF JOINT INTERVENORS
MOUNTAIN ASSOCIATION, KENTUCKIANS FOR THE COMMONWEALTH,
APPALACHIAN CITIZENS' LAW CENTER, SIERRA CLUB, AND KENTUCKY
RESOURCES COUNCIL, INC.**

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Law Center, Sierra Club, and Kentucky
Resources Council, Inc.*

Dated: July 28, 2023

DEFINITIONS

1. "Document" means the original and all copies (regardless of origin and whether or not including additional writing thereon or attached thereto) of any memoranda, reports, books, manuals, instructions, directives, records, forms, notes, letters, or notices, in whatever form, stored or contained in or on whatever medium, including digital media.
2. "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.
3. "Person" means any natural person, corporation, professional corporation, partnership, association, joint venture, proprietorship, firm, or the other business enterprise or legal entity.
4. A request to identify a natural person means to state his or her full name and business address, and last known position and business affiliation at the time in question.
5. 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.), identifying number, and its present location and custodian. If any such document was but is no longer in the Company's possession or subject to its control, state what disposition was made of it and why it was so disposed.
6. 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.
7. "And" and "or" should be considered to be both conjunctive and disjunctive, unless specifically stated otherwise.
8. "Each" and "any" should be considered to be both singular and plural, unless specifically stated otherwise.
9. 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.
10. "You" or "your" means the person whose filed testimony is the subject of these data requests 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 other 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.

11. "Kentucky Power" or "the Company" means Kentucky Power Company and/or any of its officers, directors, employees or agents who may have knowledge of the particular matter addressed, and affiliated companies.
12. "Joint Intervenors" means the Mountain Association, Kentuckians For The Commonwealth, Appalachian Citizens' Law Center, Sierra Club, and Kentucky Resources Council, Inc., who were granted the status of full joint intervention in this matter.
13. "Proposed Special Contract" means the proposed special contract between KPCO and CIG that is at issue in this proceeding.
14. "Rockhouse Facility" means the facility that has been constructed and is being operated by CIG in Pike County, Kentucky that is the subject of the Proposed Special Contract.
15. "CIG" means Cyber Innovation Group, LLC and/or any of its officers, directors, employees or agents who may have knowledge of the particular matter addressed, as well as any parent companies or affiliated companies.

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 requests for information are continuing in nature, and 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 Joint Intervenors. Any studies, 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 data request 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.

**POST-HEARING DATA REQUESTS PROPOUNDED TO KENTUCKY POWER
COMPANY BY JOINT INTERVENORS**

- 3.1. Please refer to Joint Intervenors' cross-examination of Kentucky Power witness Brian West beginning at approximately 9:23 a.m. on July 25, 2023.
- a. Please provide the load and load factor for the Rockhouse Facility for each month from January 2023 to the present.
 - b. Please provide a supplement to Kentucky Power's response to the Attorney General's data request 1-9(b) that shows the rates paid by CIG and the Rockhouse Facility's demand from January 2023 to present.
 - c. Please identify whether any of the "additional construction" referenced by Kentucky Power in response to the Attorney General's data request 1-9(a) "needed for the customer to reach a full capacity of 7,000 kW" has been completed. If any such construction has been completed, please identify the specific projects that have been completed and whether CIG now has the ability to operate the Rockhouse Facility at its full planned capacity.
- 3.2. Please refer to Joint Intervenors' cross-examination of Kentucky Power witness Brian West beginning at approximately 9:29 on July 25, 2023.
- a. Please provide copies of the bilateral capacity agreements for PJM Delivery Years 24/25 and 25/26 that were referenced by Mr. West in his testimony.
 - b. Please identify the price at which Kentucky Power has purchased capacity for each of PJM Delivery Years 24/25 and 25/26.
 - c. Please identify the entity or entities from which Kentucky Power has agreed to purchase capacity in each of PJM Delivery Years 24/25 and 25/26.
 - d. Please identify the amount of capacity that Kentucky Power has purchased for each of PJM Delivery Years 24/25 and 25/26.

Respectfully submitted,



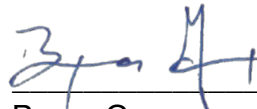
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CERTIFICATE OF SERVICE

In accordance with the Commission's July 22, 2021 Order in Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID-19*, this is to certify that the electronic filing was submitted to the Commission on July 28, 2023; that the documents in this electronic filing are a true representations of the materials prepared for the filing; and that the Commission has not excused any party from electronic filing procedures for this case at this time.



Byron Gary