

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

<b>ELECTRONIC TARIFF FILING OF</b>	)	
<b>KENTUCKY POWER COMPANY FOR</b>	)	
<b>APPROVAL OF A SPECIAL CONTRACT</b>	)	<b>Case No. 2022-00424</b>
<b>UNDER ITS ECONOMIC</b>	)	
<b>DEVELOPMENT RIDER AND DEMAND</b>	)	
<b>RESPONSE SERVICE TARIFFS WITH</b>	)	
<b>CYBER INNOVATION GROUP, LLC</b>	)	

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**SUPPLEMENTAL DATA REQUESTS OF THE ATTORNEY GENERAL**

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The intervenor, the Attorney General of the Commonwealth of Kentucky, by his Office of Rate Intervention (“Attorney General”) submits these Data Requests to Kentucky Power Company (hereinafter “Kentucky Power” or “company”) to be answered by February 24, 2023, in accord with the following:

- (1) In each case where a request seeks data provided in response to a staff request, reference to the appropriate requested item will be deemed a satisfactory response.
- (2) Identify the witness who will be prepared to answer questions concerning each request.
- (3) Repeat the question to which each response is intended to refer.
- (4) These requests shall be deemed continuing so as to require further and supplemental responses if the companies receive or generate additional information within the scope of these requests between the time of the response and the time of any hearing conducted hereon.

(5) Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association, be accompanied by a signed certification of the preparer or person supervising the preparation of the response on behalf of the entity that the response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

(6) If you believe any request appears confusing, please request clarification directly from undersigned Counsel.

(7) To the extent that the specific document, workpaper or information as requested does not exist, but a similar document, workpaper or information does exist, provide the similar document, workpaper, or information.

(8) To the extent that any request may be answered by way of a computer printout, please identify each variable contained in the printout which would not be self-evident to a person not familiar with the printout.

(9) If the company has objections to any request on the grounds that the requested information is proprietary in nature, or for any other reason, notify undersigned Counsel as soon as possible, and in accordance with Commission direction.

(10) As used herein, the words "document" or "documents" are to be construed broadly and shall mean the original of the same (and all non-identical copies or drafts thereof) and if the original is not available, the best copy available. These terms shall include all information recorded in any written, graphic or other tangible form and shall include, without limiting the generality of the foregoing, all reports; memoranda; books or notebooks; written or recorded statements,

interviews, affidavits and depositions; all letters or correspondence; telegrams, cables and telex messages; contracts, leases, insurance policies or other agreements; warnings and caution/hazard notices or labels; mechanical and electronic recordings and all information so stored, or transcripts of such recordings; calendars, appointment books, schedules, agendas and diary entries; notes or memoranda of conversations (telephonic or otherwise), meetings or conferences; legal pleadings and transcripts of legal proceedings; maps, models, charts, diagrams, graphs and other demonstrative materials; financial statements, annual reports, balance sheets and other accounting records; quotations or offers; bulletins, newsletters, pamphlets, brochures and all other similar publications; summaries or compilations of data; deeds, titles, or other instruments of ownership; blueprints and specifications; manuals, guidelines, regulations, procedures, policies and instructional materials of any type; photographs or pictures, film, microfilm and microfiche; videotapes; articles; announcements and notices of any type; surveys, studies, evaluations, tests and all research and development (R&D) materials; newspaper clippings and press releases; time cards, employee schedules or rosters, and other payroll records; cancelled checks, invoices, bills and receipts; and writings of any kind and all other tangible things upon which any handwriting, typing, printing, drawings, representations, graphic matter, magnetic or electrical impulses, or other forms of communication are recorded or produced, including audio and video recordings, computer stored information (whether or not in printout form), computer-readable media or other

electronically maintained or transmitted information regardless of the media or format in which they are stored, and all other rough drafts, revised drafts (including all handwritten notes or other marks on the same) and copies of documents as hereinbefore defined by whatever means made.

(11) For any document withheld on the basis of privilege, state the following: date; author; addressee; indicated or blind copies; all persons to whom distributed, shown, or explained; and, the nature and legal basis for the privilege asserted.

(12) In the event any document called for has been destroyed or transferred beyond the control of the company, please state: the identity of the person by whom it was destroyed or transferred, and the person authorizing the destruction or transfer; the time, place, and method of destruction or transfer; and, the reason(s) for its destruction or transfer. If destroyed or disposed of by operation of a retention policy, state the retention policy.

(13) Provide written responses, together with any and all exhibits pertaining thereto, in one or more bound volumes, separately indexed and tabbed by each response, in compliance with Kentucky Public Service Commission Regulations.

(14) "And" and "or" should be considered to be both conjunctive and disjunctive, unless specifically stated otherwise.

(15) "Each" and "any" should be considered to be both singular and plural, unless specifically stated otherwise.

Respectfully submitted,

DANIEL J. CAMERON  
ATTORNEY GENERAL



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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 February 9, 2023, an electronic copy of the foregoing was served via the Commission's electronic filing system.

this 9th day of February, 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.

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Assistant Attorney General

ELECTRONIC TARIFF FILING OF KENTUCKY POWER COMPANY FOR APPROVAL OF A  
SPECIAL CONTRACT UNDER ITS ECONOMIC DEVELOPMENT RIDER AND DEMAND  
RESPONSE SERVICE TARIFFS WITH CYBER INNOVATION GROUP, LLC,  
Case No. 2022-00424

**Data Requests**

1. See Response to AG 1-4 where the Company states, “the Company would not incur any additional incremental costs to purchase capacity otherwise provided by Rockport through at least May 31, 2024.” Confirm that, at a minimum, the Company will incur incremental costs to purchase capacity during the contract period after May 31, 2024.
2. See Response to AG 1-8 which states, “Kentucky Power is permitted to offer EDR contracts to customers even when it is capacity-short,” and cites a portion of its tariff related to that assertion.
  - a. Provide a citation to the Commission docket where the referenced tariff language was added to the tariff.
  - b. Please provide citations to any aspect of the Commission’s Orders or the Company’s testimony in that case where Finding No. 5 of Administrative Order 327 and/or the tariff language at issue was discussed.
  - c. Provide a citation to the record where the Company explicitly requested a waiver of Finding No. 5 of Administrative Order No. 327, if such a request was made.
3. See Public Attachment 1 to Response to Commission Staff’s Request 1-1, Summary Tab, cells C17:L17.
  - a. Provide all available justification for the yearly escalation of PJM LSE Transmission costs by 5%.
  - b. Confirm that the annual growth rate in AEP NITS revenue requirements from 2017 to 2023 is approximately 12%, not 5%.
  - c. Provide an updated calculation escalating PJ LSE Transmission Costs over the ten year period of the contract by 12% annually.
    - i. Provide the impact of this change to the sum of PJM LSE Transmission costs found at cell M17.
    - ii. Provide the impact of this change to the net revenue calculation at cell M21.
4. See Public Attachment 1 to Response to Commission Staff’s Request 1-1, Summary Tab, cells C15:L15. Provide all available justification for selecting a fixed energy

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charge in the amount of \$2,870,167 annually and leaving it unchanged over the ten  
year period of the contract.