

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)	

Kentucky Power Company’s Initial Data Requests to Joint Intervenors

Pursuant to the Commission’s Order dated December 15, 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 or 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. Please identify all proceedings in the past 10 years in which Ms. Sherwood supported a special contract for an electric utility customer.
4. Please identify all proceedings in the past 10 years in which Ms. Sherwood supported electric utility economic development rate discounts.
5. 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.
6. Please identify whether Ms. Sherwood has any experience developing data centers or blockchain data computing complexes.
7. 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.
8. Refer to page 10 of Ms. Sherwood's Testimony. Please provide the size of each prospective customer's load in each bullet-point example.
9. 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.
10. Please confirm that implementing additional or stricter EDR requirements for, or altogether excluding from Tariff EDR eligibility, potential cryptomining or data center customers results in those customers being treated disparately than other potential EDR customers.
11. Please explain in detail your basis for treating potential cryptomining or data center EDR customers disparately than other potential EDR customers in other industries.
12. Please refer to the Sherwood Testimony at page 14. Please also refer to Attachment 2, page 2, question 5 of the Company's Contract Filing (filed in this case on December 13, 2022). Confirm that it is still your position that it is not clear that absent the EDR discounts, Cyber Innovation would not locate its Rockhouse Facility in Kentucky Power's service territory.

13. Please state whether you are aware of or have reviewed the Company's EDR contract filing for Cyber Innovation's Long Fork/Belfry Facility, which was approved as-filed within 30 days of filing and without further investigation by the Commission on March 30, 2022 (TFS2022-00073)?
14. Please confirm that Kentucky Power's application in Case No. 2022-00181 was withdrawn on July 26, 2022.
15. Please state the legal basis that supports Ms. Sherwood's statement on page 22 of her testimony that, "If [a cryptocurrency customer seeks service absent the EDR discount], the Commission should consider requiring the same safeguards when utilities extend electric service to cryptocurrency mining operations, regardless of the tariff option."

Respectfully submitted,



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