

Kentucky Power Company  
KPSC Case No. 2022-00424  
Joint Intervenor's Second Set of Data Requests  
Dated February 10, 2023

**DATA REQUEST**

- 2\_1** Please refer to the Company's response to AG's request 1.9.
- a. Please identify the date on which the Facility became operational.
  - b. Please identify the current load and load factor for the Facility.
  - c. Does the Company anticipate that the Facility's load and/or load factor will increase in 2023, in the absence of Commission approval of the Proposed Special Contract for the Facility? If yes, please explain in detail what changes are anticipated. If no, please explain why not.

**RESPONSE**

- a. The account was opened and began consuming kWh in June 2022.
- b. Please see KPCO\_R\_JI\_2\_1\_ConfidentialAttachment1 for Rockhouse Facility's current load as of January 27, 2023.
- c. Please see Section 7.2 of the proposed contract. The Company cannot speculate as to Cyber Innovation's future operations should the Commission not approve the proposed contract.

Witness: Brian K. West

b.

The Rockhouse Facility's current load is [REDACTED] with a [REDACTED] % load factor as of January 27, 2023.

Kentucky Power Company  
KPSC Case No. 2022-00424  
Joint Intervenor's Second Set of Data Requests  
Dated February 10, 2023

**DATA REQUEST**

**2\_2** Please refer to the November 16, 2022 letter submitted with the tariff filing, at page 4, which states, “The Company will recover from Cyber Innovation any fixed costs associated with upgrading its distribution or transmission facilities to serve Cyber Innovation over the life of the Contract. These upgrades, the full cost of which the Company will recover from Cyber Innovation, also constitute improvements and upgrades to common facilities that also serve other customers.”

**RESPONSE**

The Company understands this request to be a preface for the request in Joint Intervenor 2-3.

Witness: Brian K. West

Kentucky Power Company  
KPSC Case No. 2022-00424  
Joint Intervenor's Second Set of Data Requests  
Dated February 10, 2023

**DATA REQUEST**

- 2\_3** Please identify any upgrades to distribution or transmission facilities to serve CIG over the life to the Proposed Special Contract that the Company currently anticipates.
- a. If any upgrades are identified in response to paragraph (a), please identify the anticipated fixed costs of those upgrades.
  - b. Please identify and explain in detail the mechanism by which the Company would recover the full cost of any such upgrades from CIG.

**RESPONSE**

- a. & b. See the Company's responses to KPSC 1-2(b) and KPSC 2-2.

Witness: Brian K. West

Kentucky Power Company  
KPSC Case No. 2022-00424  
Joint Intervenor's Second Set of Data Requests  
Dated February 10, 2023

**DATA REQUEST**

- 2\_4** Please refer to the Company’s response to Staff request 1.2(b), which states, “There are still long term projects the Company plans to undertake in order to help support Cyber Innovation’s loads on the 69 kV line. For example, the Company will add a Phase over Phase switch and replace the metering equipment at Long Fork.”
- a. Please identify any and all “long term projects” referenced in the response.
  - b. For each project identified, please (i) explain in detail the nature of the project; (ii) identify the anticipated capital expenditure required with a breakdown between the investment in construction materials and building vs. equipment; (iii) identify the anticipated timing of the project; and (iv) identify whether the Company anticipates that it will seek to recover the costs of the project from customers other than CIG, and if so, by what mechanism.

**RESPONSE**

- a. & b. See the Company's response to KPSC 2-2.

Witness: Amanda C. Clark

Kentucky Power Company  
KPSC Case No. 2022-00424  
Joint Intervenor's Second Set of Data Requests  
Dated February 10, 2023

**DATA REQUEST**

**2\_5** Please refer to the Company's response to Staff request 1.3, AG request 1.10, and Joint Intervenors' request 1.2. Please explain in detail what steps the Company has taken to assess and verify the accuracy of information provided by CIG concerning jobs created by the Facility.

**RESPONSE**

The Company relies on information and projections from its customers regarding the number of potential jobs. Moreover, Cyber Innovation Group is not seeking the Supplemental Billing Demand Discount (SBDD) for job creation under Tariff E.D.R. Job creation is not relevant in the analysis of whether Cyber Innovation meets the requirements to receive the Incremental Billing Demand Discount (IBDD) under Tariff E.D.R.

Witness: Amanda C. Clark

Kentucky Power Company  
KPSC Case No. 2022-00424  
Joint Intervenor's Second Set of Data Requests  
Dated February 10, 2023

**DATA REQUEST**

- 2\_6** Please refer to the Company's response to Joint Intervenors' request 1.15.
- a. Please identify specifically the characteristics of the four "potential cryptocurrency-related projects" that caused the Company to consider them for a contract under the Tariff EDR.
  - b. Please identify specifically the sizes of the loads for the four potential projects and explain how they differed from other potential projects that were not considered for a contract under the Tariff EDR.
  - c. Please identify specifically the nature of the "customer's commitment to sign a contract" for each of the four potential projects that differed from other potential projects that were not considered for a contract under the Tariff EDR.
  - d. Other than the sizes of the loads and the customer's commitment to sign a contract, were there any other criteria considered in determining whether to offer CIG a special contract for the Facility under Tariff EDR? Please explain why or why not.

**RESPONSE**

- a. The four potential cryptocurrency-related projects the Company considered for a contract under Tariff EDR because they met the requirements of the tariff (See Tariff EDR), agreed to enter into a contract with the Company for service and chose a location in the Company's territory for electric service.
- b. The four potential cryptocurrency-related projects considered for a contract under Tariff EDR include this request for 7MW, a potential 30 MW project that has not yet filed an EDR application and two projects already approved for a contract under Tariff EDR for 15MW and 20 MW (TFS2022-00073 and TFS2022-00249).
- c. The four potential cryptocurrency-related projects considered under Tariff EDR differ from the those that were not because they requested service. Those not considered either did not move forward with their projects in the Company's territory and/or were simply inquiries about rates.
- d. Cyber Innovation Group was evaluated by the Company per the requirements of Tariff EDR. Cyber Innovation Group was evaluated on the same basis as any other potential Tariff EDR customer.

Witness: Amanda C. Clark



