

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

AN ELECTRONIC EXAMINATION)	
OF THE APPLICATION OF THE FUEL)	
ADJUSTMENT CLAUSE OF KENTUCKY)	Case No 2023-00008
POWER COMPANY FROM NOVEMBER 1, 2020)	
THROUGH OCTOBER 31, 2022)	

Comes now the Attorney General of the Commonwealth of Kentucky, by his Office of Rate Intervention (“Attorney General”), and Kentucky Industrial Utility Customers (“KIUC”) and submit these Data Requests to Kentucky Power Company (hereinafter “Kentucky Power” or “company”) to be answered by November 3, 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



J. MICHAEL WEST
LAWRENCE W. COOK
ANGELA M. GOAD
JOHN G. HORNE II
ASSISTANT ATTORNEYS GENERAL
1024 CAPITAL CENTER DRIVE, SUITE 200
FRANKFORT, KY 40601-8204
PHONE: (502) 696-5433
FAX: (502) 564-2698
Michael.West@ky.gov
Larry.Cook@ky.gov
Angela.Goad@ky.gov
John.Horne@ky.gov

/s/ Michael L. Kurtz
Michael L. Kurtz, Esq.
Kurt J. Boehm, Esq.
Jody Kyler Cohn, Esq.
BOEHM, KURTZ & LOWRY
36 East Seventh Street, Suite 1510
Cincinnati, Ohio 45202
Ph: 513.421.2255 fax: 513.421.2764
mkurtz@bkllawfirm.com
kboehm@BKLLawfirm.com
jkylercohn@BKLLawfirm.com

Certificate of Service and Filing

Pursuant to the Commission's Orders and in accord with all other applicable law, Counsel certifies that, on October 20, 2023, an electronic copy of the foregoing was served via the Commission's electronic filing system.

this 20th day of October, 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.

Assistant Attorney General

Data Requests

1. Refer to the response to Staff 1-15, which reflects the Generating Unit Net Capacity Factor (%) and the Generating Unit Equivalent Availability Factor (%) for the months May 2022 through October 2022 for Big Sandy 1, Mitchell 1, and Mitchell 2. In the same format, provide similar tables that present the data for all twenty-four months in the review period and that also include the factors for Rockport 1 and Rockport 2 for each of those months.
2. Refer to the revised file attachments in response to Staff 1-16 in Case No. 2022-00036 representing a correction for certain cell row misalignments for the months July 2021 and August 2021.
 - a. Confirm that there were no changes to the amount of the PUE disallowance for the month of July 2021 related to the revised attachment computation. If not confirmed, provide the amount of the originally computed PUE disallowance and the revised computed PUE disallowance for that month.
 - b. Confirm that the amount of the PUE disallowance in the originally computed August 2021 attachment was \$322,569.53 and that was the amount originally included in the applicable FAC determination.
 - c. Confirm that the amount of the PUE disallowance computed in the revised August 2021 attachment was \$137,059.02.
 - d. Did the Company reflect the difference in the computed August 2021 PUE disallowance in a future FAC filing? If so, describe in detail how and when an adjustment was made and provide a copy of the FAC filing that included the adjustment. If not, explain why not.
3. For the last six months of the two-year period under review, May 2022 through October 2022, provide the monthly supporting peaking unit equivalent calculations in electronic Excel spreadsheet format with all formulas, columns, and rows unprotected and visible supporting the forced outage calculations. In addition, provide the corresponding amount, if any, of forced outage purchased power collected through the purchase power adjustment tariff.
4. Refer to the Excel file KPCO_R_KPSC_1_16_Attachment3 attached to the response to Staff's First Set of Data Requests, Item No. 16, in Case No. 2021-00292. This file relates to the FAC month January 2021. Refer further to the tab 01-21 Hourly Purch

Alloc and further to cells M3 through Q6, which show the calculation of \$/MWh for each of the generating units for January 2021.

- a. Confirm that the actual MWh generated for January 2021 match the amounts for each generating unit as reflected in cells M3 through Q3. If not confirmed, explain and provide the correct amounts.
 - b. Confirm that the cost of generation in January 2021 match the amounts for each generating unit as reflected in cells M5 through Q5. If not confirmed, explain and provide the correct amounts.
 - c. For each hour in January 2021, provide the generation by hour for each generating unit. If zero for any hour, reflect as zero.
 - d. Indicate how many hours of generation were experienced by Rockport 1 during January 2021.
 - e. Indicate if there was some type of cost reallocation or reclassification for each generating unit during January 2021. If so, describe each such event.
 - f. Explain all reasons why the generation costs for Rockport 1, \$276,238.86, were so high in order to generate only 2,293 MWh with a cost per MWh of \$120.488 during January 2021. As part of the answer, break down all generation costs reflected by category of costs.
5. Refer to the Excel file KPCO_R_KPSC_1_16_Attachment5 attached to the response to Staff's First Set of Data Requests, Item No. 16, in Case No. 2021-00292. This file relates to the FAC month March 2021. Refer further to the tab 03-21 Hourly Purch Alloc and further to cells M3 through Q6, which show the calculation of \$/MWh for each of the generating units for March 2021.
- a. Confirm that the actual MWh generated for March 2021 match the amounts for each generating unit as reflected in cells M3 through Q3. If not confirmed, explain and provide the correct amounts.
 - b. Confirm that the cost of generation in March 2021 match the amounts for each generating unit as reflected in cells M5 through Q5. If not confirmed, explain and provide the correct amounts.
 - c. For each hour in March 2021, provide the generation by hour for each generating unit. If zero for any hour, reflect as zero.

Electronic Examination of the Application of the Fuel Adjustment Clause of Kentucky Power Company from November 1, 2020 through October 31, 2022, Case No. 2023-00008

- d. Indicate how many hours of generation were experienced by Rockport 2 during March 2021.
- e. Indicate if there was some type of cost reallocation or reclassification for each generating unit during March 2021. If so, describe each such event.
- f. Explain all reasons why the generation costs for Rockport 2, \$382,099.49, were so high in order to generate only 5,434 MWh with a cost per MWh of \$70.315 during March 2021. As part of the answer, break down all generation costs reflected by category of costs.