

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

An Electronic Examination Of The Application Of)	
The Fuel Adjustment Clause Of Kentucky Power)	
Company From November 1, 2020 Through October)	Case No. 2023-00008
31, 2022)	

**Kentucky Power Company’s Initial Data Requests to
Kentucky Industrial Utility Customers, Inc. and the Attorney General**

Pursuant to the Commission’s Order dated September 18, 2023, Kentucky Power Company propounds the following data requests to be answered by Kentucky Industrial Utility Customers, Inc. and the Attorney General of the Commonwealth of Kentucky, by and through his Office of Rate Intervention (collectively “AG-KIUC”):

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 KIUC or the Attorney General's 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.
- "CT" means combustion turbine.
- "FAC" means Fuel Adjustment Clause.
- "PJM" means PJM Interconnection LLC.
- "PUE" means peaking unit equivalent.

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 Lane Kollen 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 Mr. Kollen's testimony. The requested information, if so available, should be provided in an electronic format, with formulas intact and visible, and no pasted values.
 - a. Include in your response a workpaper showing the calculations behind the \$173 million figure on page 15, line 19 of Mr. Kollen's testimony.
 - b. Include in your response a workpaper showing the calculations behind the \$4.62/MWh start-up cost for the hypothetical CT on page 13 of Mr. Kollen's testimony.
3. If not already provided as part of your response to Data Request No. 1 or 2, please show the work of how Mr. Kollen calculated each value contained in his direct testimony such that his calculation(s) could be reproduced by the Company or the Commission if needed.
4. Provide all schedules, tables, and charts included in the testimony and exhibits to the testimony of Randy A. Futral in electronic format, with formulas intact and visible, and no pasted values.
5. Provide all workpapers, source documents, and electronic spreadsheets used in the development of Mr. Futral's testimony. The requested information, if so available, should be provided in an electronic format, with formulas intact and visible, and no pasted values.
6. If not already provided as part of your response to Data Request No. 4 or 5, please show the work of how Mr. Futral calculated each value contained in his direct testimony such that his calculation(s) could be reproduced by the Company or the Commission if needed.
7. Confirm whether, prior to the submission of their respective direct testimonies on December 22, 2023, Mr. Kollen and Mr. Futral had fully reviewed the Commission's October 3, 2002 Order in Case No. 2000-00495-B.
8. Confirm that the PUE is based on a hypothetical combustion turbine and not an actual generating unit.
9. Please provide any and all bases for selecting 100 and 200 MW as the proposed size limit for the hypothetical combustion turbine.
10. Please confirm that AG-KIUC proposes that all purchased power in an hour above 100 or 200 MW in volume, respectively, be excluded from recovery through the FAC.

11. Please explain why AG-KIUC did not include the PUE proposals made in this case also in Case No. 2023-00159 where, if approved, the increased amount of non-FAC eligible purchased power expense could be included in the going level of base rates.
12. Please explain in detail whether, under AG-KIUC's proposal, if in an hour it is more economic to purchase all of Kentucky Power's energy requirements from the PJM spot market rather than obtain the required energy from either its owned or contracted-for generating units, all purchased power expense above the proposed 100 or 200 MW PUE limit would be excluded from recovery through the FAC.
13. Refer to the sentence beginning on Line 11 of Page 5 of Kollen's testimony.
 - a. Please provide a detailed explanation of and cite the source of the phrase, "the economic dispatch principles embedded in the FAC."
 - b. Please identify whether "the economic dispatch principles embedded in the FAC" consider a utility's participation in a Regional Transmission Organization (RTO) such as PJM, and whether those principles address economic dispatch for an entire footprint, including a utility's service territory.
14. Refer to the sentence on Lines 19-21 of Page 19 of Kollen's testimony.
 - a. Confirm whether Mr. Kollen actually conducted any simulation of "the economic dispatch of the Company's own generation" against which to compare the modifications recommended by Mr. Kollen.
 - b. If the answer to part A is confirmed, please provide all workpapers supporting the simulation. The requested information, if so available, should be provided in an electronic format, with formulas intact and visible, and no pasted values.
 - c. If the answer to part A is anything other than an unqualified confirmation, please identify what information is necessary to conduct such a simulation. Include in your response whether such a simulation would be conducted on an hourly, daily, or annual basis.
 - d. Please confirm whether the Company dispatches its units on average cost.
15. Please explain whether Mr. Futral's modified PUE calculations (the PUE calculation that Mr. Futral recommends the Commission approve instead of the currently-approved PUE calculation) include any of the following items and explain why such items were included or excluded from those calculations:
 - a. Outages
 - b. Deratings
 - c. Interrupted gas supply

d. Changes in net heat rate

16. For each item identified in Data Request 15, whether or not included in Mr. Futral's PUE calculation, please identify how each item would affect Mr. Futral's modified PUE calculation. Please be specific as to whether the inclusion or exclusion of each item in Mr. Futral's modified PUE calculation would reduce recovery of purchased power expenses recoverable through the FAC, increase recovery of purchased power expenses recoverable through the FAC, or have no effect, and why.
17. Confirm whether AG-KIUC agree that the PJM locational marginal pricing ("LMP") is the most precise indicator of what the Company actually pays for energy purchases.
18. Confirm whether AG-KIUC proposes in this case to modify the way the PUE is calculated on a retroactive basis, or whether it proposes to modify the way the PUE is calculated only on a going-forward basis, or both.

Respectfully submitted,



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