

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

In the Matter of:

ELECTRONIC 2022 INTEGRATED RESOURCE	)	
PLANNING REPORT OF KENTUCKY POWER	)	CASE NO.
COMPANY	)	2023-00092

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**LS POWER DEVELOPMENT, L.L.C.'S  
REQUEST FOR INFORMATION  
UPON KENTUCKY POWER COMPANY**

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Comes now LS Power Development, LLC (“LS Power”), pursuant to the April 14, 2023 Order of the Kentucky Public Service Commission, and hereby propounds the following requests for information upon Kentucky Power Company (“Kentucky Power”) to be answered by August 7, 2023, and in accordance with the following instructions:

**I. DEFINITIONS AND INSTRUCTIONS**

1. With respect to each discovery request, all information is to be divulged that is within the knowledge, possession or control of Kentucky Power, including its agents, employees, advisors, consultants, attorneys and/or investigators.
2. Please identify the witness(es) who will be prepared to answer questions concerning each request.
3. These requests shall be deemed continuing so as to require further and supplemental responses if Kentucky Power receives or generates additional information within the scope of these requests between the time of the response and the time of any final Order in this case.

4. All answers must be separately and fully stated in writing under oath.
5. Where a Request for Information calls for an answer in more than one part, each part should be separated in the answer so that the answer is clearly understandable.
6. For purpose of these discovery requests, the following terms shall have meanings set forth below:
  - (a) As used herein, “document,” “documentation” and/or “record,” whether stated as the singular or the plural, means any course of binders, book, pamphlet, periodical, letter, correspondence, memoranda, including but not limited to, any memorandum or report of a meeting or telephone or other conversation, invoice, account, credit memo, debit memo, financial statement, general ledger, ledger, journal, work papers, account work papers, report, diary, telegram, record, contract, agreement, study, draft, telex, handwritten or other note, sketch, picture, photograph, plan, chart, paper, graph, index, tape, data processing card, data processing disc, data cells or sheet, check acceptance draft, e-mail, studies, analyses, contracts, estimates, summaries, statistical statements, analytical records, reports and/or summaries of investigations, opinions or reports of consultants, opinions or reports of accountants, trade letters, comparisons, brochures, pamphlets, circulars, bulletins, notices, forecasts, electronic communication, printouts, all other data compilations from which information can be obtained (translated if necessary by defendants into usable form), any preliminary versions, drafts or revisions of any of the foregoing, and/or any other written, recorded, transcribed, punched, taped,

filmed or graphic matter, however produced or reproduced and regardless of origin or location, in the possession, custody and/or control of the defendant and/or their agents, accountants, employees, representatives and/or attorneys. "Document" and "record" also mean all copies of documents by whatever means made, if the copy bears any other markings or notations not found on the original.

- (b) The terms "relating to," "referring to," "referred to," "pertaining to," "pertained to" and "relates to" means referring to, reporting, embodying, establishing, evidencing, comprising, connected with, commenting on, responding to, showing, describing, analyzing, reflecting, presenting and/or constituting and/or in any way involving.
- (c) The terms "and," "or," and "and/or" within the meaning of this document shall include each other and shall be both inclusive and disjunctive and shall be construed to require production of all documents, as above-described, in the broadest possible fashion and manner.
- (d) The term "Company" shall mean Kentucky Power, and shall include, but is not limited to, each and every agent, employee, servant, advisor, consultant, insurer and/or attorney of Company. The term "you" shall be deemed to refer to Company.
- (e) The term "Commission" shall mean the Kentucky Public Service Commission.
- (f) To "identify" shall mean:
  - (1) With respect to a document, to state its date, its author, its type (for

example, letter, memorandum, chart, photograph, sound reproduction, etc.), its subject matter, its present location, and the name of its present custodian. The document may be produced in lieu of supplying the foregoing information. For each document which contains information as privileged or otherwise excludable from discovery, there shall be included a statement as to the basis for such claim of privilege or other grounds for exclusion.

- (2) With regard to a natural person, to state his or her full name, last known employer or business affiliation, title and last known home address.
  - (3) With regard to a person other than a natural person, state the title of that person, any trade name, or corporate name or partnership name used by that person, and the principal business address of that person.
- (h) To “produce” or to “identify and produce,” shall mean that Company shall produce each document or other requested tangible thing. For each tangible thing which Company contends is privileged or otherwise excludable from discovery, there shall be included a statement as to the basis for such claim of privilege or other grounds for exclusion.
- (i) The terms “Party or Parties” shall mean any organization, person, corporation, entity, etc., which intervened in the above-captioned proceeding and shall further include the Commission Staff; and

## II. REQUESTS FOR INFORMATION

1. Refer to the Integrated Resource Plan (IRP), Exhibit J. Is Kentucky Power treated as its own FRR or are all of the American Electric Power Company, Inc. (“AEP”) utilities treated as a single FRR in aggregate?

2. If Kentucky Power is not treated as its own FRR, please describe how the cost of resources used to satisfy the AEP FRR requirements are allocated to Kentucky Power ratepayers?

3. Please provide the cost of resources used to satisfy the AEP FRR requirements that is allocated to Kentucky Power ratepayers on a \$/MW-day basis for the 2022/2023 and 2023/2024 delivery years.

4. In developing the 2022 IRP, did Kentucky Power consider the procurement of energy and/or capacity from existing NGCCs (“Natural Gas Combined Cycle”) or NGCTs (“Natural Gas Combustion Turbine”) in its Reference portfolio and the other portfolio scenarios considered outside of short-term market purchases?

a. If so, please provide any comparisons of costs or Cumulative Present Worth of existing versus new NGCT and NGCCs considered.

b. If not, please explain why this was not considered as an option in the modeling.

5. Refer to the IRP, Section 5.3.1. Did Kentucky Power include a cost for hot Selective Catalytic Reduction (“SCRs”) systems in the capital cost and operating costs of a new NGCT in its modeling scenarios?

6. Refer to the IRP, Sections 5.2.1 and 5.3.1. What was the assumed useful life of a new NGCT and NGCC used when determining the economic costs and benefits of those resources in Kentucky Power’s modeling scenarios?

7. Please describe any significant financial, environmental, or regulatory risks that Kentucky Power plans to evaluate when extending the operation of Big Sandy until 2041.

8. Refer to the IRP, Section 8.2. Does the planned All-Source Request for Proposal to add cost-effective market capacity purchases and firm resources in the near-term include procurement of demand side resources from the market such as demand response and energy efficiency?

9. Refer to the IRP, Section 7.3.1, page 156. Please describe the incremental demand-side resources included in the Reference portfolio that increase from 3 MW in 2023 to 37 MW in 2030. What is the breakdown between demand response, energy efficiency and any other resources considered as DSM in the Reference portfolio? Did the modeling and the Reference portfolio include market purchases of DSM resources?

Respectfully submitted,



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**CERTIFICATE OF SERVICE**

This is to certify that the foregoing electronic filing was transmitted to the Commission on July 24, 2023 and that there are currently no parties that the Commission has excused from participation by electronic means in this proceeding. Pursuant to the Commission's July 22, 2021 Order in Case No. 2020-00085 no paper copies of this filing will be filed.

  
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*Counsel for LS Power Development, LLC*