



## DEFINITIONS

1. “Document” means the original and all copies (regardless of origin and whether or not including additional writing thereon or attached thereto) of any memoranda, reports, books, manuals, instructions, directives, records, forms, notes, letters, or notices, in whatever form, stored or contained in or on whatever medium, including digital media.
2. “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.
3. “Person” means any natural person, corporation, professional corporation, partnership, association, joint venture, proprietorship, firm, or the other business enterprise or legal entity.
4. A request to identify a natural person means to state his or her full name and business address, and last known position and business affiliation at the time in question.
5. 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.), identifying number, and its present location and custodian. If any such document was but is no longer in the Company’s possession or subject to its control, state what disposition was made of it and why it was so disposed.
6. 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.
7. “And” and “or” should be considered to be both conjunctive and disjunctive, unless specifically stated otherwise.
8. “Each” and “any” should be considered to be both singular and plural, unless specifically stated otherwise.
9. 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.
10. Unless otherwise specified in each individual interrogatory or request, the terms “Kentucky Power,” “KY Power,” “KPCo,” or “KP” refer collectively to Kentucky Power Company, including any parent or affiliated companies, predecessors-in-interest, officers, directors, employees, authorized agents, outside consultants or contractors, or other representatives who may have knowledge of the particular matter addressed.
11. “Joint Intervenors” or “JI” means the Mountain Association, Kentuckians for the Commonwealth, Appalachian Citizens’ Law Center, and Kentucky Solar Energy Society
12. “CSAPR” means Cross-State Air Pollution Rule.

13. “NAAQS” means National Ambient Air Quality Standards.
14. “NO<sub>x</sub>” means Nitrogen Oxides.
15. “SIP” means State Implementation Plan.

## 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 requests for information are continuing in nature, and 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 Joint Intervenors. Any studies, 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 data request should be construed independently and not with reference to any other interrogatory herein for purpose of limitation.
4. Whenever the documents responsive to a discovery request consist of modeling files (including inputs or output) and/or workpapers, the files and workpapers should be provided in machine-readable electronic format (e.g., Microsoft Excel), with all formulas and cell references intact.
5. The answers provided should first restate the question asked and also identify the person(s) supplying the information.
6. 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.
7. Wherever the response to a request consists of a statement that the requested information is already available to Joint Intervenors, please provide a detailed citation to the document that contains the information. This citation shall include the title of the document, relevant page number(s), and, to the extent possible, paragraph number(s) and/or chart/table/figure number(s).
8. If you claim a privilege including, but not limited to, the attorney-client privilege or the work product doctrine, as grounds for not fully and completely responding to any discovery request, please describe the basis for your claim of privilege in sufficient detail so as to permit Joint Intervenors or the Commission to evaluate the validity of the claim. With respect to documents for which a privilege is claimed, please produce a "privilege log" that identifies the author, recipient, date, and subject matter of the documents or interrogatory answers for which you are asserting a claim of privilege and any other

information pertinent to the claim that would enable Joint Intervenors or the Commission to evaluate the validity of such claims.

9. 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.
10. The interrogatories are to be answered under oath by the witness(es) responsible for the answer.

**POST-HEARING DATA REQUESTS PROPOUNDED TO KENTUCKY POWER  
COMPANY BY JOINT INTERVENORS MOUNTAIN ASSOCIATION,  
KENTUCKIANS FOR THE COMMONWEALTH, APPALACHIAN CITIZENS'  
LAW CENTER, AND KENTUCKY SOLAR ENERGY SOCIETY**

- 3.1. Please refer to Joint Intervenors' cross-examination of Company witness Spitznogle between approximately 10:12 a.m. to 10:15 a.m. on June 12, 2024.
- a. State whether any analysis has been conducted by or for the Company regarding the need to install additional NO<sub>x</sub> controls at the Big Sandy facility to comply with either the Revised CSAPR Update,<sup>1</sup> or, if reinstated, the Good Neighbor Plan.<sup>2</sup>
    - i. If any analysis has been conducted, please provide such analysis.
    - ii. If not, please explain why not.
  - b. State whether any analysis has been conducted by or for the Company regarding the current or future need to purchase additional NO<sub>x</sub> allowances to comply with the Revised CSAPR Update, or, if reinstated, the Good Neighbor Plan.
    - i. If any analysis had been conducted, including regarding the monthly number of annual and ozone season NO<sub>x</sub> allowances needed for purchase for the Big Sandy facility in 2023, please provide such analysis; or
    - ii. If not, please explain why not and explain how the Company complied with the Revised CSAPR Update in 2023 with respect to NO<sub>x</sub> emissions from Big Sandy.
- 3.2. Please refer to Joint Intervenors' cross-examination of Company witness Haratym between approximately 6:51 p.m. to 6:54 p.m. on June 12, 2024. Please indicate where in the modeling files, by reference to title of file, worksheet tab, row, column, and/or cell, it is indicated that the model takes into account savings from demand-side energy efficiency bundles that extend beyond the IRP study period. If not previously produced in response to data requests, please produce such data in native format.
- 3.3. Please refer to Joint Intervenors' cross-examination of Company witness Haratym between approximately 6:51 p.m. to 6:54 p.m. on June 12, 2024. Please refer to the workbook "KPCO\_R\_KPSC\_1\_8\_PublicAttachment7", worksheet "PortfolioResourcesYear1", and the rows with corresponding to the "Resource\_Name" of "Residential-Low/Medium\_23-25" through "IQW\_23-25" (Rows 51-72).
- a. The column "Fixed\_Cost" indicates there is a fixed cost for these bundles. Please explain how AURORA levelizes the cost of these energy efficiency measures over the full service lives of the efficiency measures.

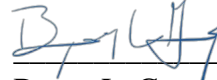
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<sup>1</sup> US EPA, *Revised Cross-State Air Pollution Rule Update for the 2008 Ozone NAAQS*, 86 Fed. Reg. 23,054 (Apr. 30, 2021), (codified at 40 C.F.R. Part 97, Subpart GGGGG); *see also* US EPA, *Federal "Good Neighbor Plan" for the 2015 Ozone National Ambient Air Quality Standards; Response to Judicial Stays of SIP Disapproval Action for Certain States*, 88 Fed. Reg. 49,295, 49,297 (July 31, 2023) and 40 C.F.R. §52.38(b)(14)(iii).

<sup>2</sup> US EPA, *Federal "Good Neighbor Plan" for the 2015 Ozone National Ambient Air Quality Standards*, 88 Fed. Reg. 36,654 (June 5, 2023).

- b. Please state whether the costs reported in the “Fixed\_Cost” column were developed based on the savings with or without the application of the Supplemental Energy Efficiency Adjustment.

Respectfully submitted,



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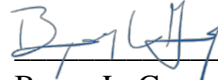
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The Commonwealth, Appalachian Citizens'  
Law Center, and Kentucky Solar Energy  
Society*

## CERTIFICATE OF SERVICE

In accordance with the Commission's July 22, 2021 Order in Case No. 2020-00085, Electronic Emergency Docket Related to the Novel Coronavirus COVID-19, this is to certify that the electronic filing was submitted to the Commission on June 14, 2024; that the documents in this electronic filing are a true representations of the materials prepared for the filing; and that the Commission has not excused any party from electronic filing procedures for this case at this time.

  
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Byron L. Gary