

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

**ELECTRONIC 2022 INTEGRATED )  
RESOURCE PLANNING REPORT )  
OF KENTUCKY POWER COMPANY )**

**Case No. 2023-00092**

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**SUPPLEMENTAL DATA REQUESTS OF THE ATTORNEY GENERAL AND  
KENTUCKY INDUSTRIAL UTILITY CUSTOMERS TO  
KENTUCKY POWER COMPANY**

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Come now the intervenors, Attorney General of the Commonwealth of Kentucky, by and through his Office of Rate Intervention (“Attorney General”) and the Kentucky Industrial Utility Customers (“KIUC”) and submit these Supplemental Data Requests to Kentucky Power Company (hereinafter “Kentucky Power” or “Company”) to be answered by August 7, 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 company receives or generates 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 for the Office of Attorney General and KIUC.
- (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 the Office of the Attorney General and KIUC 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  
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COUNSEL FOR KENTUCKY INDUSTRIAL UTILITY  
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**SUPPLEMENTAL DATA REQUESTS**

1. Given that PJM is considering financial incentives for black-start generating units, explain to what extent the Company's modeling took this into consideration with regard to dispatchable supply-side resources.
2. Reference the response to AG-KIUC 1-21. Explain why KPCo would not "[have] access to the transmission grid operated by PJM."
3. Reference the responses to AG-KIUC 1-14 and PSC 1-42. Confirm that with regard to onshore wind, neither KPCo nor any other AEP affiliate ascribe any transmission costs to such resources.
  - a. If not confirmed, provide a breakdown of both AEP transmission system costs, and non-AEP transmission system costs.
4. In the event the plan the Company eventually pursues includes either a NGCC or gas-fired CT, provide a discussion regarding siting of such a resource, including the access to any interstate gas transmission lines that traverse the KPCo service territory.
  - a. Refer also to the response to PSC 1-46 (b). Explain whether the Company would consider purchasing or leasing land either at or near East Kentucky Power Cooperative's Smith generating station, which has close access to at least one gas transmission pipeline, and has existing electric transmission interconnections to the PJM grid. If the Company will not consider this, explain fully why not.
5. Explain whether the AEP board of directors has any non-independent member(s) representing investors holding a direct or indirect ownership interest of less than 10% in AEP.
6. Reference the response to PSC 1-39 (b). Confirm that transmission costs were not included in the referenced "combination of factors."
7. Refer to the response to AG-KIUC 1-6 wherein the Company states that "For PJM Delivery Years 2024/25 and 2025/26, the Company has bilateral contracts for capacity with a third party."
  - a. Provide a description of the bilateral contracts, including, but not limited to, the capacity pursuant to each bilateral contract, the cost for that capacity, dispatch rights, energy pricing.
  - b. Indicate when each bilateral contract was entered into.
  - c. Describe the effects of the bilateral contracts on the Company's IRP, if any. If none, then explain why there are no effects.
  - d. Explain whether the decision to enter into the bilateral contracts was made as part of an RFP process. If so, provide a narrative description of that process, and provide a copy of the actual RFP and all responses thereto.

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8. Refer to the response to AG-KIUC 1-9, which describes the Company's modeling approach.
  - a. Provide a response to the question that was asked with respect to different typical revenue requirement profiles for owned solar compared to PPA solar.
  - b. Confirm that owned solar requires capital expenditures by the Company for the non-transmission assets.
  - c. Confirm that PPA solar does not require capital expenditures by the Company for the non-transmission assets owned by the third party.
  - d. Confirm that GAAP accounting applicable to owned solar precludes so-called phase-in plans for a rate regulated utility whereby the capital cost recovery cannot be backloaded, i.e., levelized. If the Company disagrees and believes that such a result could be achieved for new generating resources, then provide all authoritative support for this position.
9. Refer to the response to AG-KIUC 1-17, which asks for information regarding affiliates of Kentucky Power that have developed or may develop solar, wind, and/or other renewable electric generation resources. The response acknowledged that there are such affiliates, but failed to identify the affiliates and failed to provide any of the other information requested. Provide a complete response to the request, assuming that the term "unregulated renewable generation business" refers to an affiliate that is not rate regulated by a federal or state regulator and that the term "regulated utilities" refers to the AEP operating utilities and other rate regulated utilities with which Company affiliates have or may have entered into PPAs for the sale and purchase of generation from renewable resources.
10. Refer to the attachment to the response to AG-KIUC 1-23.
  - a. Provide the ADIT balances and the remaining undepreciated tax basis for each Mitchell unit at the end of each year shown on this schedule. In addition, provide the assumption with respect to the write-off of the remaining tax basis of each Mitchell unit at the end of 2028.
  - b. Provide the calculations used to quantify rate base at the end of each year as shown on this schedule by component (gross plant, accumulated depreciation, accumulated depreciation, materials and supplies, fuel, etc.).
  - c. Indicate whether property tax expense is included in the FOM or anywhere else on this schedule. If not, then explain why it is not. In any event, provide the property tax expense for each Mitchell unit for each year through 2042, consistent with the study period on this schedule.
  - d. Provide the calculations of the capital charges for each generating unit for each year shown on this schedule in live Excel format with all formulas intact. If the calculations are based on a capital charge as opposed to the sum of various costs, then provide the calculation of the capital charge rate in live Excel format with all formulas intact.

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11. Refer to the response to AG-KIUC 1-25. Is the addition of the 50 mW storage resource in the Company's preferred plan economic on an incremental basis, meaning does it increase the cumulative net present value of the Company's preferred portfolio compared to the preferred portfolio with the storage resource, all else equal. Provide all analyses, including assumptions, calculations, modeling results, and all other support developed or relied on to respond to this request.

12. Refer to the response to AG-KIUC 1-38, which states:

*Indicate which new capacity resources and the MW capacity for each such resource identified in both the Reference portfolio and the Preferred Plan portfolio will be acquired specifically to replace the Mitchell Plant capacity. Indicate each such resource the Company considers to be "dispatchable" and provide the criteria used to make this determination. Provide all support for your response.*

The Company's response failed to identify the resources that will be acquired specifically to replace the Mitchell capacity, identify each such resource the Company considers to be "dispatchable," and provide the criteria used to make this determination. Provide a response to these specific requests or explain why the Company is unable to do so.

13. Refer to the Section 7.2.2.3 of the IRP at 148-149, wherein the Company addresses the net purchases or sales resulting from its plans, and Section 7.3 of the IRP at 155, wherein the Company addresses the performance of seven portfolios over five PJM market scenarios.

- a. Provide separately and on a net basis the purchases in mWh and dollars made in excess of the Company's generation to meet the Company's load and sales in mWh dollars from the Company's generation in excess of the Company's load by month and in total for each calendar year in the study period for each of the seven portfolios under each of the five PJM market scenarios. In addition, provide the net margins in dollars on the sales from the Company's generation in excess of the Company's load by month and in total for each calendar year in the study period for each of the seven portfolios under each of the five PJM market scenarios. Provide these results in live Excel format with all formulas intact.
- b. Provide the weighted average cost of purchases per mWh and the weighted average selling price per mWh for the sales provided in response to part (a) of this question by month and annually for each calendar year in the study period for each of the seven portfolios under each of the five PJM market scenarios. Provide these results in live Excel format with all formulas intact.
- c. Provide the Company's generation in mWh by generating resource, summed for each resource type, and summed for all resources for each month and in total for each calendar year in the study period for each of the seven portfolios under each of the five PJM market scenarios. Provide these results in live Excel format with all formulas intact.

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- d. Provide the Company's native load requirements in mWh for each month and in total for each calendar year in the study period for each of the seven portfolios under each of the five PJM market scenarios. Provide these results in live Excel format with all formulas intact.
- e. Provide the annual and cumulative revenue requirements split between non-fuel and fuel/purchased power expense for each of the seven portfolios under each of the five PJM market scenarios on a nominal dollar and present value dollar basis.

CERTIFICATE OF SERVICE

Pursuant to the Commission's Orders and in accord with all other applicable law, Counsel certifies that, on July 24th, 2023, an electronic copy of the foregoing was served via the Commission's electronic filing system.

/s/ Michael L. Kurtz

Michael L. Kurtz, Esq.

Jody Kyler Cohn, Esq.

BOEHM, KURTZ & LOWRY