

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

In the Matter of:

ELECTRONIC APPLICATION OF)
KENTUCKY POWER COMPANY FOR (1) A)
GENERAL ADJUSTMENT OF ITS RATES)
FOR ELECTRIC SERVICE; (2) APPROVAL)
OF TARIFFS AND RIDERS; (3) APPROVAL)
OF ACCOUNTING PRACTICES TO) CASE NO. 2023-00159
ESTABLISH REGULATORY ASSETS AND)
LIABILITIES; (4) A SECURITIZATION)
FINANCING ORDER; AND (5) ALL OTHER)
REQUIRED APPROVALS AND RELIEF)

**TENDERED INITIAL DATA REQUESTS OF JOINT MOVANTS FOR INTERVENTION AS
JOINT INTERVENORS MOUNTAIN ASSOCIATION, APPALACHIAN CITIZENS' LAW
CENTER, KENTUCKIANS FOR THE COMMONWEALTH, AND KENTUCKY SOLAR
ENERGY SOCIETY**

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Solar Energy Society*

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 "you," "your," "Kentucky Power," "KY Power," "KPCo," or "KP" refer collectively to Kentucky Power Company, including any parent or affiliated companies, predecessors-in-interest, employees, authorized agents, outside consultants or contractors, or other representatives.

11. "Kentucky Power," "KY Power," "KPCo," or "KP" means Kentucky Power Company and/or any of their officers, directors, employees or agents who may have knowledge of the particular matter addressed, and any parent or affiliated companies (including but not limited to American Electric Power Company ("AEP") and its affiliated entities).

12. "The Company" means Kentucky Power Company.

13. "Joint Movants" means the Mountain Association, Appalachian Citizens' Law Center, Kentuckians For The Commonwealth, and Kentucky Solar Energy Society, who have moved for the status of full joint intervention in this matter.

14. "Commission" or "PSC" means the Kentucky Public Service Commission, including its Commissioners, personnel, and offices.

15. "CAIDI" means Customer Average Interruption Duration Index.

16. "DRR" means Distribution Reliability Rider.

17. "FGD" means Flue Gas Desulfurization.

18. "HEA" means Home Energy Assistance.

19. "LIHEAP" means Low Income Home Energy Assistance Program.

20. "NPV" means Net Present Value.

21. "O&M" means Operation and Maintenance.

22. "ROW" means Rights of Way.
23. "SAIDI" means System Average Interruption Duration Index.
24. "SAIFI" means System Average Interruption Frequency Index.
25. "TOR" means Trees Outside of Rights-of-Way.

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 Movants. 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 Movants, 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 Movants 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 Movants 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.

**TENDERED INITIAL DATA REQUESTS PROPOUNDED TO
KENTUCKY POWER COMPANY BY JOINT MOVANTS**

- 1.1. Please provide any redacted documents included in the Company's initial filing and direct testimonies in non-redacted, electronic versions (machine readable, unprotected, with formulas intact), if they have not already been provided to the Joint Movants.
- 1.2. Please produce all workpapers, in electronic spreadsheet format with formulas intact, supporting each of the Statements, testimonies, exhibits, and attachments included in the Company's initial filing and direct testimonies.
- 1.3. With respect to the potential buildout of crypto-currency mining facilities in Kentucky Power territory:
 - a. Please identify all the cryptocurrency mining facilities that were operating during the test year in Kentucky Power territory by name, location, capacity need (in MW), and costs associated with each facility.
 - b. Please explain whether those cryptocurrency mining facility customers included in the Company's test year data?
 - c. Please identify all currently operating cryptocurrency mining facilities in Kentucky Power territory by name, location, capacity need (in MW), and costs associated with each facility.

- d. Has the Company conducted any analysis, as part of any cost of service study or otherwise, that compares the amount that cryptocurrency mining facilities are paying in rates relative to the cost of serving these facilities.
 - i. If so, please identify or produce any such analysis or study.
 - ii. If not, please state why not.

1.4. Please refer to the direct testimony of Timothy C. Kerns, page 11, lines 5–8.

- a. Does the Company anticipate any additional generation plant capital additions related to fossil fuel generation or Production Plant Blanket will be placed in service between now and 2028?
- b. If so, has the Company identified any particular projects or expenditures related to generation plant capital additions? Please identify and describe these projects and provide any current estimate of any costs associated.

1.5. Please refer to the direct testimony of Alex E. Vaughan, page 14, lines 21–23.

- a. As part of its “long-term replacement solution,” is Kentucky Power evaluating whether to propose to construct a natural gas combustion turbine or natural gas combined cycle plant?
- b. If yes, please provide any documents or information showing the status of this evaluation, including any documents or information concerning the potential size(s) of any such plant(s) being considered, potential site(s) for any such plant(s), potential attributes of any such plant(s) (i.e. CT, NGCC, etc.), potential cost(s) for any such plant(s), and potential timing for any proposal(s) to construct any such plant(s) and timing for any such plant(s) to commence operation.

1.6. Please refer to the direct testimony of Cynthia G. Wiseman, page 13, lines 8–11.

- a. Please describe in detail current or future plans that the Company is aware of that would decrease its rate base.
- b. Please describe in detail any current or future plans that the Company is aware of that would increase capital investment, including funds from its parent company AEP.
- c. Please describe in detail how securitization being proposed in this case would impact the “main items driving” the low ROE discussed in testimony.

- 1.7. Please refer to the direct testimony of Cynthia G. Wiseman, Figure CGW-2.
 - a. Please provide document(s) reflecting the underlying data and sources used in creating Figure CGW-2 in a machine-readable electronic format (e.g., Microsoft Excel).
 - b. Please provide document(s) reflecting any updates to the data shown in Figure CGW-2 past the first quarter of 2023, to the extent such data are available.

- 1.8. Please refer to the direct testimony of Franz D. Messner, Exhibit FDM-1.
 - a. Please provide the workpapers and underlying calculations (with formulas intact) used in developing the NPV estimate, in a machine-readable electronic format (e.g., Microsoft Excel).
 - b. Please provide the assumed interest rate for the securitized bond and underlying source and basis for that assumed rate.
 - c. In general, could some amount of a securitized bond issued in Kentucky be used to fund re-investments in new resources?
 - i. If so, please explain any constraints on the amount that would be available for re-investment.
 - ii. If not, please explain why not.
 - d. In general, could some amount of a securitized bond issued in Kentucky be used for transition assistance to workers affected by a unit's retirement?
 - i. If so, please explain any constraints on the amount that would be available for transition funding.
 - ii. If not, please explain why not.

- 1.9. Please refer to the direct testimony of Katrina T. Niehaus, Niehaus Exhibit 2.
 - a. Please provide the workpapers and underlying calculations (with formulas intact) used in developing the estimate of annual securitization bond payments in a machine-readable electronic format (e.g., Microsoft Excel).
 - b. Apart from the starting balance of the securitization bond, please explain why the annual payments shown in the exhibit (column "Total P&I") are roughly half of the \$37 million annual revenue requirement estimated by Witness Messner. As part of your answer, please provide a detailed breakdown of any additional costs and fees that are included in the estimated annual revenue requirement.

- 1.10. Please refer to the direct testimony of Adrien M. McKenzie, page 21, lines 15–22.
- a. Would raising the “common equity required” involve investors buying stock in AEP, the Company’s parent?
 - i. If not, please explain.
 - b. With what other “investment opportunities” does Kentucky Power compete that are specific to the Company and not its parent company, AEP? Please explain in detail.
 - c. Please confirm that if AEP is the sole shareholder in Kentucky Power, then AEP receives the earnings from Kentucky Power, some of which is distributed to AEP shareholders.
 - i. If denied, please explain in detail.
 - ii. If confirmed, is there an equity investor that is needed outside of AEP to support the Company’s equity needs? Please explain.
 - d. Is there anything preventing AEP from investing additional equity in Kentucky Power?
 - i. If so, please explain what would prevent this.
 - e. If AEP were to invest additional equity in Kentucky Power, could AEP raise its own funds in equity markets to do so?
 - i. If not, please explain why not.
 - f. If AEP were to raise equity or debt, are those potential investors more likely to review the credit ratings of AEP or Kentucky Power?
 - g. If AEP were to invest additional equity in Kentucky Power, could AEP raise its own funds by selling assets?
 - i. If not, please explain why not.
 - h. Please provide the credit ratings for AEP issued by S&P, Fitch, and Moody’s in the past ten years.
 - i. Please provide the credit ratings for Kentucky Power issued by S&P, Fitch, and Moody’s in the past ten years.
- 1.11. Please refer to the direct testimony of Adrien M. McKenzie, Exhibits AMM-2 through AMM-12.
- a. Please provide the workpapers and underlying calculations (with formulas intact) used in developing the cost of equity estimates.
 - b. Please confirm that nearly all of the forecast data, including dividend yields and growth rates, in the cost of equity estimates was for parent companies, not subsidiaries.
 - i. If denied, please explain where forecast data was used for subsidiaries.

- c. If the securitization being proposed in this case were approved, please explain how that would affect the Company's:
 - i. Balance sheet
 - ii. Earnings
 - iii. Risk profile
- d. If the Company were to sell its share of the Mitchell plant, please explain how that would affect the Company's:
 - i. Balance sheet
 - ii. Earnings
 - iii. Risk profile

1.12. Please refer to the direct testimony of Adrien M. McKenzie, Exhibits AMM-3 through AMM-10.

- a. Please explain in detail why Mr. McKenzie did not include other Kentucky investor-owned utilities in the "Utility Group" that he analyzed, such as Louisville Gas & Electric Company or Kentucky Utilities Company.
- b. Please explain in detail why Mr. McKenzie included Duke Energy Corporation (the parent company) in the "Utility Group" that he analyzed, rather than directly comparing Kentucky Power to Duke Energy Kentucky.
- c. Please explain in detail why Mr. McKenzie did not include any other AEP affiliates in the "Utility Group" that he analyzed, such as Appalachian Power Company, Indiana Michigan Power Company, Public Service Company of Oklahoma, or Southwestern Electric Power Company.

1.13. Please refer to the direct testimony of Everett G. Phillips, page 10, in which Mr. Phillips states, referring to the test-year amount requested for O&M, "This represents the amount necessary for the Company to continue to provide safe and reliable service to its customers. In order to further improve reliability for customers, the Company is proposing the DRR, which has associated O&M not included in the test year amount."

- a. Are the projects funded by the DRR not necessary to provide safe and reliable service to customers? Please explain why or why not.
- b. If the Commission does not grant the Company's request for a DRR, will the Company undertake the projects in the DRR Work Plan (Exhibit EGP-4)? Please explain why or why not.

- 1.14. The following questions refer to the DRR described in the direct testimonies of Brian K. West and Everett G. Phillips.
- a. Please confirm that the DRR would not include any capital expenditures for the Company's generation facilities. If not confirmed, please explain.
 - b. Has the Company developed a prioritized list of potential projects that fall within the 5 DRR categories in the DRR Work Plan (TOR – Enhanced ROW Widening, Additional Tie Lines, DACR/Recloser Modernization, Additional New Distribution Substation Sources, and Asset Renewal/Storm Hardening or Resiliency)? See the direct testimony of Everett G. Phillips, page 35, Figure-EGP10.
 - i. If so, please provide a copy of any such list.
 - ii. If not, please provide a thorough explanation of how the Company will prioritize projects for inclusion in the DRR.
 - c. Please identify each capital project with costs greater than \$100,000 that is planned or under consideration for inclusion in the DRR Work Plan. For each such project, please provide:
 - i. the county where such project would be performed;
 - ii. project description;
 - iii. the estimated cost for each of the years 2024–28;
 - iv. Please produce any project charter, project scope document, economic analysis, and/or other written evaluation of the costs and benefits of such project.
 - v. If not already provided in response to subpart iv, please identify the project's estimated impact on CAIDI, SAIDI, and/or SAIFI (to the extent available).
 - d. Has the Company identified any projects beyond the scope of the five-year DRR Work Plan, i.e., starting in year 2029 or later? If so, please provide a list of any such projects.
 - e. Has the Company considered non-wires alternatives to the distribution projects identified in the DRR Work Plan?
 - i. If so, please provide any analysis of non-wires alternatives for distribution investments conducted by the company.
 - ii. If not, please explain why not.
- 1.15. Please refer to the direct testimony of Brian K. West, pages 17–18.
- a. Does the Company plan to continue the DRR beyond the five years covered by the current DRR Plan? Please explain why or why not.

- i. If yes, when does the Company anticipate that the DRR will no longer be necessary? Does the Company have a planned sunset date for the DRR?
 - ii. If no, what will the Company do if the projects identified for the DRR Work Plan are not completed within the five years of the plan? Please answer in reference to both completion of projects and recovery of costs expended.
- b. Does the Company plan to present an updated DRR five-year plan at each annual true-up proceeding?

1.16. Please refer to the direct testimony of Michael M. Spaeth, page 6, in which Mr. Spaeth states, "The Company included the revenues and expenses associated with the non-Mitchell FGD portion of the test year Environmental Surcharge in its proposed base rate cost of service." Please provide a breakdown of the amounts of revenues and expenses included in the test year, including which generation facility or facilities those revenues or expenses are associated with.

1.17. Please refer to the direct testimony of Michael M. Spaeth, page 20, in which Mr. Spaeth states: "The Company proposes that the DRR be recovered from customers on a per bill basis by residential and all other rate schedules, excluding outdoor lighting, street lighting, subtransmission voltage and transmission voltage customers."

- a. Please explain what Mr. Spaeth means by a "per-bill basis." Will the DRR be a fixed or volumetric (per-kWh) charge? Please explain in detail the Company's rationale for structuring it in this way.
- b. Please provide the estimated monthly cost of the DRR, on a total and per kWh basis, to the average customer, in each of the Company's rate classes over the five-year term of the proposed DRR Work Plan, in native format. If native format is Excel, please provide with formulas intact.

1.18. Please refer to the direct testimony of Michael M. Spaeth, Exhibits MMS-6 and MMS-7.

- a. Please confirm that these are the Marginal Cost of Service analyses for customers taking service under the Economic Development Rider rates and the Company's special contract customer, respectively.
- b. Please explain why line (10) Generation Capacity is accorded a \$0 incremental cost.

- c. For special contract customer in MMS-7, please explain why the marginal costs for distribution are \$0.
- 1.19. Please refer to the direct testimony of Stevi N. Cobern, pages 4–5.
- a. Please confirm that “dollar-for-dollar match” means that the Company matches 100% of the funding raised through the Residential Energy Assistance Tariff, and that those funds come from Company shareholders.
 - b. Do the numbers provided in Figure SNC-1 and described on page 4 match the actual expenditures and number of customers who actually received benefits in 2022-2023?
- 1.20. Please refer to the direct testimony of Stevi N. Cobern. The following questions are about the Company’s HEA Programs:
- a. Please describe the Company’s prioritization criteria for applicants for each HEA Program.
 - b. Please estimate how many of the Company’s residential customers are eligible for each HEA Program.
 - c. Has the Company considered an HEA program that would provide assistance to customers for summer cooling expenses, or bill assistance for economic hardship outside the January to April time frame? Please explain.
 - d. Do the HEA programs leverage or utilize federal funding from the LIHEAP program in any way? Please explain.
 - e. Is the Company aware that its HEA programs are not listed along with other utility programs in the LIHEAP Clearinghouse state snapshot page for Kentucky, <https://liheapch.acf.hhs.gov/profiles/Kentucky.htm>? If so, please state the reason Kentucky Power’s programs are not listed, if known.
- 1.21. Please refer to the direct testimony of Stevi N. Cobern, page 9. How much supplemental funding does the Company provide to Kentucky Housing Corporation’s Weatherization Assistance Program annually, and is that amount funded by ratepayers or Company-shareholders?
- 1.22. Please refer to the direct testimony of Stevi N. Cobern, page 11.
- a. Please provide the marketing materials or describe the publicity plan for the three customer workshops in the Hazard district. What did the Company learn about “how customers prefer to interact” from those workshops?

- b. Please provide the two concept papers submitted for the Grid Resilience and Innovation and Clean Energy Demonstration on Current and Former Mine Land programs.
- c. Please state which tax credits available through the Inflation Reduction Act¹ the Company plans to take advantage of.

1.23. Does the Company still maintain its voluntary energy cost assistance program, Donation HEART, approved by the Commission in Case No. 2018-00311?

- a. If so, does the Company, or AEP, match donated funds into this program? If so, what is the match percentage and is there a cap? Please provide the amounts contributed to this program annually since 2020, by both volunteers and Company shareholders.
- b. If not, please explain why not.

1.24. Please provide the following data concerning the Company's HEA programs from during the 2022–2023 program year, separated by month:

- a. The amount of total funds collected from ratepayers for these programs via meter charge.
- b. The amount of donations collected from ratepayers for the HEA program.
- c. The total number of residential customers.
- d. The amount of shareholder funds allocated for the program.
- e. The amount of HEA funds distributed to participants.
- f. The current balance of the HEA Account.
- g. The amount, if any, of "rolled over" and unspent HEA funds.

1.25. Please refer to the direct testimony of Alex E. Vaughan, page 29, at lines 3–14.

- a. Please explain in detail why Kentucky Power is proposing to construct these new solar facilities as "connected to the Company's distribution system" rather than as "market-facing generation resources."
- b. Please provide any analyses that Kentucky Power has conducted concerning the benefits and/or costs to customers of constructing new solar facilities in this manner. If the Company has not conducted any such analyses, please explain why not.
- c. Please provide any analyses that Kentucky Power has conducted concerning the benefits and/or costs to AEP shareholders of

¹ Inflation Reduction Act of 2022, Pub. L. No. 117-169, H.R. 5376, 117th Cong. (2022).

constructing new solar facilities in this manner. If the Company has not conducted any such analyses, please explain why not.

- d. Please explain whether Kentucky Power has considered the potential for programs to allow and encourage third-party ownership of distributed solar systems (e.g., solar leases and power purchase agreements). If the Company has considered the potential for such programs, please provide information concerning what options have been considered and any reasons for not proposing such programs in this case. If the Company has not considered the potential for any such programs, please explain in detail why not.
- e. Please explain whether Kentucky Power has considered the potential for “virtual net metering” programs that would allow the credits from a single solar array to be credited to multiple customers’ accounts. If the Company has considered the potential for such programs, please provide information concerning what options have been considered and any reasons for not proposing such programs in this case. If the Company has not considered the potential for any such programs, please explain in detail why not.
- f. Please explain whether Kentucky Power has considered the potential for programs to allow and encourage customer-sited battery storage as a demand response resource. If the Company has considered the potential for such programs, please provide information concerning what options have been considered and any reasons for not proposing such programs in this case. If the Company has not considered the potential for any such programs, please explain in detail why not.

1.26. Please refer to the direct testimony of Lerah M. Kahn, page 13, lines 13–15.

- a. Please identify the entity or entities with which Kentucky Power has entered into a bilateral capacity purchase agreement for the PJM 2024/2025 planning year.
- b. Please produce a copy of Kentucky Power’s bilateral capacity purchase agreement for the PJM 2024/2025 planning year.

1.27. Please refer to Kentucky Power’s 2022 Integrated Resource Planning Report, filed with the Commission in Case No. 2023-00092.² In Section 3.4.2,

² Integrated Resource Planning Report to the Kentucky Public Service Commission, *In re Electronic 2022 Integrated Resource Planning Report of Kentucky Power Company*, Case No. 2023-00092 (filed Mar. 20, 2023).

the Company states that, “[a]s of December 2022, Kentucky Power had 184 net metering system installations including 156 residential systems and 27 commercial systems and 1 industrial system for a total of 2.5 MW of net metered photovoltaic DG (i.e., rooftop solar) throughout the service territory.” Please provide the following information for Kentucky Power’s net metering customer-generators, *for the test year and each of the years between 2020 and 2022*:


- a. How many kWh of excess generation were supplied back to KPC from all net metering customers in each month and year? How many kWh did net metering customers receive in each month and year? For customers receiving net metering service, list the cumulative generation for each month of each year that net metering service customer meter reads fall within, the total delivered kWh and received kWh by rate class.
 - b. List the number of residential and commercial customers taking net metering service within each specific rate class.
 - c. List the total installed generation capacity (AC and DC) for customers receiving net metering service within each specific rate class tariff.
 - d. For a customer that first began taking net metering service in this timeframe, did that require replacing their meter or was net metering service achieved with reprogramming the existing meter? Does that answer depend on the existing rate class of customer-generator taking net metering service?
 - e. What was the capacity (system size in KW AC) of each net metering service customer for each year?
 - f. What was the total combined capacity by class of all net metering service customers, residential net metering service customers, and commercial net metering service customers for each year?
 - g. What percentage of Kentucky Power’s single hour peak load for the previous year did net metering service represent for each year?
 - h. Please provide any additional data concerning net metering for the years 2020 through 2022 which Kentucky Power has reported to the U.S. Energy Information Administration, Federal Energy Regulatory Commission, the Kentucky Energy and Environment Cabinet, or any other regulatory agency.
- 1.28. How many Kentucky Power customers heat their homes primarily using electric heating? Please provide any available analyses or workpapers to support your answer.

- 1.29. Please refer to the direct testimony of Everett G. Phillips at page 12, lines 11-23; and the direct testimony of Stephen D. Blankenship, pages 4-6.
- a. Please provide a copy of IEEE 1366-2017, the "IEEE Guide for Electric Power Distribution Reliability Indices."
 - b. Please explain how Kentucky Power Company calculates T_{MED} .
 - c. In calculating T_{MED} to what extent and how is the increasing frequency of severe weather events (see Figure SDB-1) taken into account?
- 1.30. Please refer to the direct testimony of Lerah M. Khan, page 4, lines 4 - 9.
- a. Please confirm that "projects necessary for the Company to comply with the Federal Clean Air Act" and authorized to be included in the Company's ECP refers to projects at all of the Company's generation facilities. If other than confirmed, please explain.
 - b. Please confirm that all other projects necessary to comply with "federal, state, and local requirements" authorized to be included in the Company's ECP includes only projects "applicable to coal combustion wastes and by-products from coal-fired generation facilities." If other than confirmed, please explain.
- 1.31. Please refer to the direct testimony of Lerah M. Khan, page 4, lines 14-15; and exhibit LMK-5.
- a. Please provide a detailed breakdown of costs associated with the Company's emission allowance inventory, [and] emission allowance expenses" for both NO_x and SO_2 emissions allowances purchased or sold during the previous five years.
 - b. Has the Company projected the need for it to purchase allowances? If so please provide any such projection and associated workpapers in a machine-readable electronic format (e.g., Microsoft Excel). If not, explain why not?
- 1.32 Please describe and provide the justification supporting, including any analyses or studies supporting, any revisions or changes to the following current Company tariffs, rate schedules, optional services to standard rate schedules, or riders:
- a. NMS Tariff
 - b. NMS II Tariff
 - c. Rider R.P.O.
 - d. NMS Interconnection Agreement or Guidelines
 - e. NMS II Interconnection Agreement or Guidelines
 - f. COGEN/SPP I

g. COGEN/SPP II

1.33 Please provide all studies, evidence, or analyses supporting the necessity for each component of the Distribution Reliability Rider, and justification for proposing recovery of each component of the proposed Rider as a rider rather than through base rates.

Respectfully submitted,

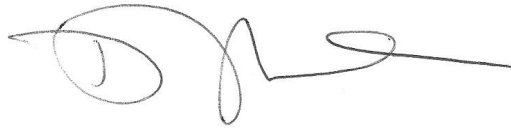


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*Counsel for Joint Movants for Intervention
as Joint Intervenors, Mountain Association,
Appalachian Citizens' Law Center,
Kentuckians for the Commonwealth, and
Kentucky Solar Energy Society*

CERTIFICATE OF SERVICE

This is to certify that these *Tendered Initial Data Requests of Joint Movants for Joint Intervention Mountain Association, Appalachian Citizens' Law Center, Kentuckians for the Commonwealth, and Kentucky Solar Energy Society* were submitted to the Commission on August 14, 2023; 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.

A handwritten signature in black ink, appearing to read 'Tom FitzGerald', with a long horizontal line extending to the right.

Tom FitzGerald