

Kentucky Power Company  
KPSC Case No. 2024-00243  
Commission Staff's First Set of Data Requests  
Dated September 11, 2024

**DATA REQUEST**

**KPSC 1\_1** Refer to the Application, page 6. Confirm that the estimated capacity benefit of \$2.1 million, the estimated energy benefit of \$42.6 million, and the estimated renewable energy credit (REC) benefit of \$42.6 million on a net present value basis over the 15-year life of the contract equals \$87.3 million attributable to the REPA.

**RESPONSE**

Confirmed, generally. The estimated capacity, energy and REC benefits are estimated and rounded for presentation purposes. Due to the rounding, the exact estimated net present value (NPV) of benefits may not equate exactly to \$87.3 million. For the exact individual NPV of benefits, and the total, please see KPCO\_R\_KPSC\_1\_7\_ConfidentialAttachment1.

Witness: Nicole M. Coon

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**DATA REQUEST**

- KPSC 1\_2** Refer to the Direct Testimony of Tanner S. Wolfram (Wolfram Direct Testimony), page 7, lines 16–20.
- a. Explain whether the 4.8 MW of accredited capacity is reflective of Kentucky Power's PJM summer capacity obligation only.
  - b. Explain whether the 4.8 MW is based on an effective load carrying capability (ELCC) measure. If not, explain the basis for the 4.8 MW capacity accreditation from an 80 MW facility.

**RESPONSE**

- a. The 4.8 MW of ELCC accredited capacity figure is set annually and will be counted toward the Company's summer contract obligation. The ELCC value the Company used does take into account winter availability of solar resources, however.
- b. The 4.8 MW accredited capacity is reflective of PJM's current ELCC process.

Witness: Tanner S. Wolfram

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**DATA REQUEST**

**KPSC 1\_3** Provide PJM's published Base Residual Auction (BRA) ELCC Class Ratings for both solar and wind resources for the current planning year through 2040. If PJM does not have published estimate extending to 2040, provide Kentucky Power's estimation of those resource ratings that governed the amounts of renewable resources included in its 2022 IRP Preferred Plan.

**RESPONSE**

Please see KPCO\_R\_KPSC\_1\_3\_Attachment1 for ELCC ratings for planning year 2024/2025, KPCO\_R\_KPSC\_1\_3\_Attachment2 for 2025/2026, KPCO\_R\_KPSC\_1\_3\_Attachment3 for 2026/2027, and KPCO\_R\_KPSC\_1\_3\_Attachment4 for preliminary ELCC class ratings through planning year 2034/2035. Attachment 4 included a preliminary forecast for 2026/2027 and the number was updated to that found in Attachment 3. Attachment 4 is preliminary and is subject to change. BRA ELCC class ratings can be also be found on PJM's website at <https://www.pjm.com/planning/resource-adequacy-planning/effective-load-carrying-capability> .

For the 2022 IRP analysis, the Company used the forecast included in KPCO\_R\_KPSC\_1\_3\_Attachment5. The ELCC assumptions are included on the Key Assumptions tab beginning in cell B20. These values were modeled by Charles River Associates (CRA).The ELCC discussion in the 2022 IRP can be found in section 6.5.2, which is provided in KPCO\_R\_KPSC\_1\_3\_Attachment6. CRA was engaged separately for the 2022 IRP and the scope of CRA's engagement for the 2022 IRP did not overlap with the scope of CRA's engagement in connection with the September 22, 2023 All-Source RFP.

Witness: Nicole M. Coon



Effective Load Carrying Capability (ELCC) Class Ratings

*ELCC Class Ratings for 2024/2025*

ELCC Class	2024/2025
Onshore Wind	21%
Offshore Wind	47%
Solar Fixed Panel	33%
Solar Tracking Panel	50%
4-hr Storage	92%
6-hr Storage	100%
8-hr Storage	100%
10-hr Storage	100%
Solar Hybrid Open Loop - Storage Component	75%
Solar Hybrid Closed Loop - Storage Component	68%
Hydro Intermittent	36%
Landfill Gas Intermittent	61%
Hydro with Non-Pumped Storage*	95%

\* PJM performs an ELCC analysis for each individual unit in this class. The value shown in the table is a representative value provided for informational purposes



## ELCC Class Ratings for the 2025/2026 Base Residual Auction

### ELCC Class Ratings for the 2025/2026 Base Residual Auction

The following table provides the ELCC Class Ratings applicable to the 2025/2026 Base Residual Auction (BRA) as calculated under the methodology approved by FERC on January 30<sup>th</sup>, 2024 in [Docket No. ER24-99](#).

	2025/2026 BRA ELCC Class Ratings
Onshore Wind	35%
Offshore Wind	60%
Fixed-Tilt Solar	9%
Tracking Solar	14%
Landfill Intermittent	54%
Hydro Intermittent	37%
4-hr Storage	59%
6-hr Storage	67%
8-hr Storage	68%
10-hr Storage	78%
Demand Resource	76%
Nuclear	95%
Coal	84%
Gas Combined Cycle	79%
Gas Combustion Turbine	62%
Gas Combustion Turbine Dual Fuel	79%
Diesel Utility	92%
Steam	75%

- Pursuant to RAA Schedule 9.2, sections C(2) and D(1)(b): No ELCC Class Rating is determined for Combination Resources and ELCC Resources in the Hydropower with Non-Pumped Storage Class, in the Complex Hybrid Class, in the Other Unlimited Resource Class, and in any ELCC Class whose members are so distinct from one another that a single ELCC Class Rating would fail to capture their physical characteristics. In these instances, the Accredited UCAP is based on a resource-specific ELCC analysis.
- For the 2025/2026 Delivery Year, PJM determined that the members of the Gas Combined Cycle Dual Fuel Class are so distinct from one another that a single ELCC Class Rating would fail to capture their physical characteristics. This is due to the Gas Combined Cycle Dual Fuel Class having very few members (less than 10 units) following the dual fuel attestation process for the 2025/26 BRA and there being a large disparity in the observed historical performance during hours of risk across the members of this class. Therefore, no ELCC Class Rating will be determined for the Gas Combined Cycle Dual Fuel Class for the 2025/2026 Delivery Year.



## ELCC Class Ratings for the 2026/2027 Base Residual Auction

### ELCC Class Ratings for the 2026/2027 Base Residual Auction

The following table provides the ELCC Class Ratings applicable to the 2026/2027 Base Residual Auction (BRA).

	2026/2027 BRA ELCC Class Ratings
Onshore Wind	34%
Offshore Wind	61%
Fixed-Tilt Solar	8%
Tracking Solar	13%
Landfill Intermittent	54%
Hydro Intermittent	38%
4-hr Storage	57%
6-hr Storage	65%
8-hr Storage	68%
10-hr Storage	78%
Demand Resource	74%
Nuclear	95%
Coal	84%
Gas Combined Cycle	78%
Gas Combustion Turbine	68%
Gas Combustion Turbine Dual Fuel	79%
Diesel Utility	91%
Steam	74%

- Pursuant to RAA Schedule 9.2, sections C(2) and D(1)(b): No ELCC Class Rating is determined for Combination Resources and ELCC Resources in the Hydropower with Non-Pumped Storage Class, in the Complex Hybrid Class, in the Other Unlimited Resource Class, and in any ELCC Class whose members are so distinct from one another that a single ELCC Class Rating would fail to capture their physical characteristics. In these instances, the Accredited UCAP is based on a resource-specific ELCC analysis.
- For the 2026/2027 Delivery Year, PJM determined that the members of the Gas Combined Cycle Dual Fuel Class are so distinct from one another that a single ELCC Class Rating would fail to capture their physical characteristics. This is due to the Gas Combined Cycle Dual Fuel Class having a large disparity in the observed historical performance during hours of risk across the members of this class. Therefore, no ELCC Class Rating will be determined for the Gas Combined Cycle Dual Fuel Class for the 2026/2027 Delivery Year and units in the Gas Combined Cycle Dual Fuel Class will receive a resource-specific ELCC value.

### Preliminary ELCC Class Ratings for period Delivery Year 2026/27 – Delivery Year 2034/35

The following table provides the preliminary ELCC Class Ratings for Delivery Years in the period 2026/27 – 2034/35 as calculated under the methodology approved by FERC on January 30th, 2024 in Docket No. ER24-99. These preliminary ELCC Class Ratings are non-binding and are only for indicative purposes.

ELCC Class	2026/ 27	2027/ 28	2028/ 29	2029/ 30	2030/ 31	2031/ 32	2032/ 33	2033/ 34	2034/ 35
Onshore Wind	35%	33%	28%	25%	23%	21%	19%	17%	15%
Offshore Wind	61%	56%	47%	44%	38%	37%	33%	27%	20%
Fixed-Tilt Solar	7%	6%	5%	5%	4%	4%	4%	4%	3%
Tracking Solar	11%	8%	7%	7%	6%	5%	5%	5%	4%
Landfill Intermittent	54%	55%	55%	56%	56%	56%	56%	56%	54%
Hydro Intermittent	38%	40%	37%	37%	37%	37%	39%	38%	38%
4-hr Storage	56%	52%	55%	51%	49%	42%	42%	40%	38%
6-hr Storage	64%	61%	65%	61%	61%	54%	54%	53%	52%
8-hr Storage	67%	64%	67%	64%	65%	60%	60%	60%	60%
10-hr Storage	76%	73%	75%	72%	73%	68%	69%	70%	70%
Demand Resource	70%	66%	65%	63%	60%	56%	55%	53%	51%
Nuclear	95%	95%	95%	96%	95%	96%	96%	94%	93%
Coal	84%	84%	84%	85%	85%	86%	86%	83%	79%
Gas Combined Cycle	79%	80%	81%	83%	83%	85%	85%	84%	82%
Gas Combustion Turbine	61%	63%	66%	68%	70%	71%	74%	76%	78%
Gas Combustion Turbine Dual Fuel	79%	79%	80%	80%	81%	82%	83%	83%	83%
Diesel Utility	92%	92%	92%	92%	92%	93%	93%	93%	92%
Steam	74%	73%	74%	75%	74%	75%	76%	74%	73%

## **6.5.2 Effective Load Carrying Capability (ELCC) Results**

As described in Section 6.3.3 and Section 6.5.1, the Kentucky Power scenarios have produced a range of capacity expansion results using the AURORA LTCE model that result in different penetration levels of renewables and 4-hour battery storage. The ELCC value of the renewables and 4-hour battery storage are based on the amounts installed in each scenario. The resulting differences are illustrated by the curves in Figure 41 through Figure 43 above.

Under the Reference, REF-HC, and ECR scenarios, solar ELCC values decline from the current 54% value to levels near 26% by 2037, falling over time in-line with the increments of new solar added in each case. Less solar is added in the NCR case driven by lower commodity and energy prices, hence solar ELCC declines to around 28% peak value by 2037. While the NCR scenario represents an upper bound, the CETA case sets the lower bound at 23%. Under the CETA scenario, capital costs are lower for renewable resources, leading to more and earlier additions. Similar to solar, storage ELCC values vary across scenarios, ranging from 66% to 80% by 2037. For wind, ELCC varies the least with a uniform level of 11% across scenarios for onshore and a narrow range of 22% to 25% for offshore wind by 2037. The resulting solar, storage, and wind summer ELCC values are summarized in Figure 54 through Figure 57 below.



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**KPSC 1\_4** Refer to the Wolfram Direct Testimony, page 8, lines 1–3. Explain whether the Project will supply approximately three percent of Kentucky Power's energy needs during the winter season.

**RESPONSE**

The Company understands the winter season to be defined as November 1 through March 31. In those winter season months, the Project would supply approximately 2% of Kentucky Power's energy needs.

Witness: Tanner S. Wolfram

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**DATA REQUEST**

**KPSC 1\_5** Refer to the Application, page 6, and Wolfram Direct Testimony, page 15, lines 1–8. The Application indicates that energy revenues will flow back to customers through the Fuel Adjustment Clause (FAC) and Mr. Wolfram’s testimony indicates that the renewable energy purchase agreement (REPA) costs will be recovered through Tariff P.P.A. Reconcile the apparent discrepancies in cost recovery.

**RESPONSE**

Those statements are not in conflict. As Witness Wolfram explains on page 10 of his Direct Testimony, the Company will bid the Bright Mountain Facility into the PJM day-ahead spot market and the Company will receive revenue from PJM when the facility is picked up by the market. The PJM revenue the Company receives from the facilities participation in the PJM spot market will be passed back to customers through the FAC in accordance with the Company’s approved Tariff F.A.C. (3c) and 807 KAR 5:056.

Conversely, the cost the Company pays the developer for each MWh generated at the facility (\$83.26 per MWh) under the terms of the REPA will be recovered through the Company’s Commission-approved Tariff P.P.A. which provides for recovery of “the annual cost of power purchase by the Company through new Purchase Power Agreements...” through element “N” of its rate calculation.

Witness: Tanner S. Wolfram

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**DATA REQUEST**

- KPSC 1\_6** Explain how and at what rate(s) the Bright Mountain Solar facility's energy will be bid into the PJM energy day ahead market.
- a. If the PJM day ahead and or real time locational marginal price (LMP) is greater than the fixed \$83.68 per MWh solar cost, explain when PJM would call on that unit to produce energy.
  - b. Because Kentucky Power would be obligated to take all energy produced by the Bright Mountain solar facility, for the hours when the real time energy LMP is less than the \$83.68 per MWh cost of produced energy, explain how Kentucky Power intends to recover the cost differential for that higher cost energy.

**RESPONSE**

AEPSK will develop an offer curve that will be supplied to the developer to submit to PJM.

- a. It is important to note that the \$83.68 per MWh is what the Company is paying the developer for each MWh generated at the facility (defined as the "Contract Rate"). The Contract Rate does not represent what the facility will be bid at within the PJM day-ahead and real-time spot markets. The Facility will receive a day-ahead award when the market clears above the day-ahead offer curve, and the Facility will generate anytime the real-time LMP is above the real-time offer curve.
- b. The Company will recover the Contact Rate through Tariff PPA. However, as explained by Company witnesses Coon and Wolfram, the costs the Company incurs will be partially offset by the Renewable Energy Certificates revenues and the revenues the Company receives from PJM when the Facility is picked up by the market.

Witness: Tanner S. Wolfram

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**DATA REQUEST**

- KPSC 1\_7** Refer to the Direct Testimony of Nicole M. Coon (Coon Direct Testimony), page 4, lines 5–10. Provide all workpapers and assumptions regarding the estimation of the \$42.57 million in energy benefits. Workpapers should be in original format if in Excel, with all formulas, rows, and columns unprotected and fully accessible. Include with the response a specific discussion of the following:
- a. Explain how the forecasted LMP was derived over the 15-year contract period.
  - b. Explain how the facility's bid offer curve into the day ahead energy market is forecast and derived.

**RESPONSE**

Please see KPCO\_R\_KPSC\_1\_7\_ConfidentialAttachment1, which includes all calculations of benefits and costs of the REPA.

- a. AEP's Fundamental Forecast is developed by the AEPSC Fundamental Forecasting organization. The forecast is a long-term commodity market forecast. It covers the electricity market within the Eastern Interconnect. It is provided to AEPSC and all AEP operating companies for use. Energy Exemplar's Aurora energy market simulation model is the primary tool used to make the Fundamental Forecast. The Aurora model is widely used by utilities for integrated resource and transmission planning, power cost analysis and detailed generator evaluation. A copy of the 2023 Fundamental Forecast can be found in KPCO\_R\_KPSC\_1\_7\_Attachment2.
- b. The facility's day-ahead offer curve will be the economic inflection point where Kentucky Power wants a day-ahead award for clearing prices above the offer curve and does not want a day-ahead award for clearing prices below the curve. The offer curve will be developed in accordance to PJM Manual 15.

Witness: Nicole M. Coon

Witness: Tanner S. Wolfram

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**DATA REQUEST**

**KPSC 1\_8** Refer to the Coon Direct Testimony, page 4, lines 11–18. Provide all workpapers and assumptions regarding the estimation of the \$2.06 million in capacity benefits. Workpapers should be in original format if in Excel, with all formulas, rows, and columns unprotected and fully accessible. Include with the response a specific discussion of how the forecasted cost of capacity was derived over the 15-year contract period.

**RESPONSE**

Please see KPCO\_R\_KPSC\_1\_7\_ConfidentialAttachment1, KPCO\_R\_KPSC\_1\_7\_Attachment2, and the written response to KPSC 1-7(a) for information about how the forecast was developed.

Witness: Nicole M. Coon

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**DATA REQUEST**

**KPSC 1\_9** Refer to the Coon Direct Testimony, page 4, lines 19–26. Provide all workpapers and assumptions regarding the estimation of the \$42.58 million in REC benefits. Workpapers should be in original format if in Excel, with all formulas, rows, and columns unprotected and fully accessible. Include with the response a specific discussion of how the forecasted REC market price was derived over the 15-year contract period.

**RESPONSE**

Please see KPCO\_R\_KPSC\_1\_7\_ConfidentialAttachment1.

The forecasted REC market price was developed internally. For years 2026-2028, the Company utilized Evolution Markets broker quotes for known, settled prices for PJM TRI Class I RECs. Please see KPCO\_R\_KPSC\_1\_9\_ConfidentialAttachment1 for the source documentation. KPCO\_R\_KPSC\_1\_9\_ConfidentialAttachment2 contains the calculation for the rest of the REC price curve. The Company utilized publicly available information on PJM state Renewable Portfolio Standards (“RPS”) requirements and their alternative compliance payments (“ACPs”). Reports from various commissions’ websites were utilized to pull known data for either RECs retired or load subject to RPS requirements. This formed the basis for the total demand for RECs in PJM from states that have requirements. To account for states that may have lower ACPs than the market curve, the calculation takes out that state’s demand. To produce the price, the 2022 price from the brokers quotes was adjusted up or down based on the growth in demand from 2022 in a given year to the max demand which occurs in 2050. The Company set a ceiling for the price based on the minimum average of the ACPs of the states, as a conservative assumption. The ACP figure was utilized as a cap because the projected supply of RECs in PJM does not reach the REC demand in PJM. This produced the final forecasted REC market price that was used in Witness Coon’s analysis.

Witness: Nicole M. Coon

KPCO\_R\_KPSC\_1\_9\_ConfidentialAttachment1 is redacted in its entirety.

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**DATA REQUEST**

**KPSC 1\_10** Refer to the Coon Direct Testimony, page 4, lines 11–26. Provide a cost benefit study showing the annual costs and revenue streams separately that demonstrates the project is beneficial overall to Kentucky Power ratepayers. Provide the cost benefit study in Excel spreadsheet with all formulas, rows, and columns unprotected and fully accessible.

**RESPONSE**

Please refer to KPCO\_R\_KPSC\_1\_7\_ConfidentialAttachment1 for the annual costs and benefits. Although the Project is a net cost to customers, as explained in Company witness Wolfram's testimony, the Project will provide a physical hedge against volatile fuel prices and support economic development in the Company's service territory. These benefits are not included in the Net Present Value calculated in KPCO\_R\_KPSC\_1\_7\_ConfidentialAttachment1.

Witness: Nicole M. Coon

Witness: Tanner S. Wolfram



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**DATA REQUEST**

**KPSC 1\_11** Refer to the Coon Direct Testimony, Figure NMC-1, page 5. Provide an update to Figure NMC-1 showing the annual impact for the life of the contract.

**RESPONSE**

Please see KPCO\_R\_KPSC\_1\_11\_ConfidentialAttachment1. The “Summary of All Years” tab has the requested annual impacts.

Witness: Nicole M. Coon

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**DATA REQUEST**

**KPSC 1\_12** Refer to Kentucky Power's integrated resource plan (IRP) in Case No. 2023-00092. Include the Bright Mountain Solar facility PPA as a resource option along with the other resources discussed in Section 5 of the IRP and provide the results of how this additional resource affects the resulting portfolios and Kentucky Power's IRP preferred plan as presented and discussed in Section 7 of the IRP. If any inputs or assumptions are updated, provide a discussion of those changes.

**RESPONSE**

The Company's IRP portfolios included generic solar resources being selected. For example, in the Company's Preferred Plan, in 2027, there was an addition of 250 MW of solar in 2027. The 80MW solar facility would be a specific replacement of a portion of that 250 MW of generic solar resources economically selected in 2027 in all the portfolios. As such, the Bright Mountain facility does not change the analysis completed as part of the IRP.

Witness: Tanner S. Wolfram

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**DATA REQUEST**

**KPSC 1\_13** Refer to the Direct Testimony of Zachary M. Yetzer (Yetzer Direct Testimony), page 8, lines 19–24. Provide the workpapers supporting the key price analyses (levelized adjusted net cost of energy, and levelized adjusted net cost of capacity, and value to cost ratio) and explain the assumptions driving each analysis.

**RESPONSE**

Please see KPCO\_R\_KPSC\_1\_13\_ConfidentialAttachment1, which includes all inputs for economic modeling. For the Bight Mountain REPA, please ensure cell G6 on 'Project Cost' sheet is selected to "Solar-Avangrid-Bright Mountain-PPA-Life-15", then see 'Metric's sheet, cell B2 for LANCOE, cell B3 for LANCOC, and cell B4 for Value to Cost Ratio. The LANCOE is the present value net cost of the scenario divided by the present value of the energy output. Dividing by the energy output differentiates from LANCOC where the present value of net cost is divided by present value of accredited capacity. Value to Cost Ratio, is the present value of total values divided by total cost.

Witness: Zachary M. Yetzer

KPCO\_R\_KPSC\_1\_13\_ConfidentialAttachment1 is redacted in its entirety.

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**DATA REQUEST**

**KPSC 1\_14** If the underlying assumptions driving each of these analyses differ from the analogous assumptions utilized in the analyses presented in the Coon Direct Testimony, page 8, lines 9–21, provide a detailed comparison and discuss the reasons for any differences.

**RESPONSE**

The forecasts for capacity value, ELCC, energy value, and generation varied between the two analyses. The RFP bids were evaluated off the 2022 IRP which was modeled with inputs by consultant CRA. In order to evaluate the bids consistent with the IRP, Kentucky Power decided to use the CRA forecasts for capacity and energy.

The generation profiles only vary in years when there is an extra day (leap year). The bid evaluation took this into account while witness Coon's evaluation did not.

A comparison of the all the forecasts can be found in  
KPCO\_R\_KPSC\_1\_14\_ConfidentialAttachment1.

Witness: Zachary M. Yetzer

Witness: Nicole M. Coon

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**DATA REQUEST**

**KPSC 1\_15** Refer to the Yetzer Direct Testimony, page 11, lines 1–4. Explain whether the \$83.68 per MWh price paid to Bright Mountain can be broken out by energy, capacity, and REC cost elements. If so, provide the separate cost elements.

**RESPONSE**

No, the \$83.68 per MWh cannot be itemized.

Witness: Zachary M. Yetzer

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**DATA REQUEST**

**KPSC 1\_16** Refer to the Yetzer Direct Testimony, Confidential Exhibit ZMY-4, Section 5.6, page 29. Explain the rationale for the scheduling arrangements between Kentucky Power and Bright Mountain.

**RESPONSE**

The scheduling arrangement referenced is in line with industry standards and represents a practical arrangement for the delivery and receipt of Renewable Energy Products at the Point of Delivery.

Witness: Zachary M. Yetzer

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**DATA REQUEST**

**KPSC 1\_17** Refer to the Yetzer Direct Testimony, Exhibit ZMY-1, pages 62–85. Kentucky Power's IRP Preferred Plan calls for 700 MW of wind capacity beginning in 2026. Explain how many proposals for wind were received and a summary of the results of Kentucky Power's evaluations.

**RESPONSE**

The Company received 71 proposals from bidders, representing 36 unique projects. Three of those projects were for wind. One wind project passed the Eligibility & Threshold (E&T) requirements, but subsequently withdrew from the RFP.

Witness: Zachary M. Yetzer



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**DATA REQUEST**

**KPSC 1\_18** Refer to the Yetzer Direct Testimony, Exhibit ZMY-1, pages 28–58. Explain how many bids were received in response to the thermal Request for Proposal (RFP), were evaluated and a summary of Kentucky Power's individual bid evaluations.

**RESPONSE**

The Company received 71 proposals from bidders, representing 36 unique projects. Fourteen of those projects were thermal resource proposals. Projects that met E&T requirements underwent a Detailed Analysis. The Detailed Analysis is provided in Confidential Exhibit ZMY-3 in the Direct Testimony of Company witness Yetzer.

Witness: Zachary M. Yetzer

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**DATA REQUEST**

- KPSC 1\_19** Refer to Kentucky Power's IRP, Preferred Plan, pages 173–174 of 1182 which calls for a 480 MW combustion turbine (CT) in 2029.
- a. In light of recent PJM BRA results, explain why it is prudent to wait till 2029 to bring CTs on-line and to purchase an estimated 407 MW of capacity in 2028.
  - b. Assuming that Kentucky Power is going to bring a thermal resource on-line in 2029, explain the projected lead time required for both a CT and a natural gas combined cycle unit, including the filing of a Certificate of Public Convenience and Necessity (CPCN).

**RESPONSE**

a. and b. First, and as explained in the Direct Testimony of Company witness Wolfram, the Bright Mountain REPA is just the first step in the Company's overall generation planning strategy to address its energy and capacity needs. The Company is still evaluating potential additional resources, including thermal resources, based on a variety of factors, including when those resources can be brought online to serve Kentucky Power customers.

Second, as it relates to the Company's most recent IRP, the IRP assumed generic resources and the availability for when they might be able to be put in service. In light of the Company's recent RFP results that were not available at the time of the IRP, some of the projects identified could serve to mitigate some of the market capacity purchases identified in the IRP prior to 2029. As explained above, the Company is still evaluating the results of the RFPs and, as such, is still evaluating the regulatory approvals and timing for any such filings.

Witness: Tanner S. Wolfram

VERIFICATION

The undersigned, Nicole M. Coon, being duly sworn, deposes and says she is a Regulatory Consultant Principal for American Electric Power Service Corporation, that she has personal knowledge of the matters set forth in the foregoing responses and the information contained therein is true and correct to the best of her information, knowledge, and belief.

Nicole M Coon  
Nicole M. Coon

State of Ohio )  
County of Madison )

Case No. 2024-00243

Subscribed and sworn to before me, a Notary Public in and before said County and State, by Nicole M. Coon, on September 19 2024

[Signature]  
Notary Public

My Commission Expires Never

Notary ID Number No ID



Paul D. Flory  
Attorney At Law  
Notary Public, State of Ohio  
My commission has no expiration date  
Sec. 147.03 R.C.



**VERIFICATION**

The undersigned, Zachary M. Yetzer, being duly sworn, deposes and says he is the Regulated Infrastructure Development Manager for American Electric Power Service Corporation, that he has personal knowledge of the matters set forth in the foregoing responses and the information contained therein is true and correct to the best of his information, knowledge, and belief.

  
\_\_\_\_\_  
Zachary M. Yetzer

State of Ohio                    )  
  )  
County of Franklin            )     Case No. 2024-00243

Subscribed and sworn to before me, a Notary Public in and before said County and State, by Zachary M. Yetzer, on September 17<sup>th</sup>, 2024

  
\_\_\_\_\_  
Notary Public

My Commission Expires N/A

Notary ID Number —



**ASHLEY R LAWSON**  
Attorney at Law  
NOTARY PUBLIC, STATE OF OHIO  
My Commission Has No Expiration Date  
Section 147.03 O.R.C.