

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

In the Matter of:

Electronic Application Of Kentucky Power Company)	
For (1) An Order Approving The Terms And)	
Conditions Of The Renewable Energy Purchase)	
Agreement For Solar Energy Resources Between)	
Kentucky Power Company And Bright Mountain)	Case No. 2024-00243
Solar, LLC; (2) Authorization To Enter Into The)	
Agreement; (3) Recovery Of Costs Through Tariff)	
P.P.A.; (4) Approval Of Accounting Practices To)	
Establish A Regulatory Asset; And (5) All Other)	
Required Approvals And Relief)	

Kentucky Power Company’s Motion For Extension of Time

Kentucky Power Company (“Kentucky Power” or “Company”) moves the Public Service Commission of Kentucky (“Commission”) pursuant to 807 KAR 5:001, Section 22 for an extension of time for which to respond to parts of certain data requests propounded by the Attorney General and Kentucky Industrial Utility Customers, Inc. (collectively “AG-KIUC”).

AG-KIUC data request 1-1 (“AG-KIUC 1-1”) requests:

Provide copies of all proposals submitted in response to the three RFPs issued on September 22, 2023 and all correspondence to and from Kentucky Power related to those proposals.

AG-KIUC data request 1-5 (“AG-KIUC 1-5”) requests:

Refer to the Direct Testimony of Witness Yetzer at 2 wherein he states: “My primary responsibilities include obtaining direction from AEP’s operating companies, including Kentucky Power, drafting RFPs on their behalf, and managing the RFP process which includes the processing of proposals, providing input for the economic analysis, leading due diligence activities, and negotiation of the associated agreements.

a. Provide a copy of all “direction” received from Kentucky Power Company as to the scope of the RFP (“all resource RFP”), the evaluation of the bids received, and the rejection of all [redacted] resource bids.

- b. Provide a copy of all “direction” received from AEP as to the scope of the RFP (“all resource RFP”), the evaluation of the bids received, and the rejection of all [redacted] resource bids.
- c. Provide a copy of all analyses, studies, correspondence, and all other “direction” and/or documentation provided by either AEP or Kentucky Power Company that led to the conclusion that all [redacted] resource bids should be rejected and communicated the decision to do so to the bid evaluation teams.
- d. Identify the specific individuals by name, position, and entity that made the decision to reject all [redacted] resource bids.

AG-KIUC data request 1-9 (“AG-KIUC 1-9”) requests:

Provide a copy of all correspondence between the Company and either Bright Mountain Solar, LLC and/or Avangrid Renewables, LLC in regards to the Bright Mountain Solar REPA. The request includes copies of all letters, memos, emails, and/or other written communications between the two parties after the issuance of the RFP by the Company until the present.

The Commission’s August 21, 2024 procedural order requires Kentucky Power to respond to all initial data requests by September 25, 2024.

Kentucky Power has worked diligently to identify and begin preparing all relevant and responsive documents to be produced in response to AG-KIUC 1-1, 1-5, and 1-9. Despite Kentucky Power’s diligence and best efforts to prepare and timely file documents responsive to those requests, Kentucky Power requires additional time to review, specifically, correspondence for responsiveness, confidentiality, and privilege, and to prepare such correspondence to be produced. Kentucky Power therefore moves the Commission pursuant to its August 21, 2024 procedural order in this case for a one-week extension of time through October 2, 2024 to file the correspondence responsive to AG-KIUC 1-1, 1-5, and 1-9 with the Commission. Kentucky Power is timely filing all other responses to data requests and attachments thereto, including the subparts of AG-KIUC 1-1 and 1-5 that are not correspondence.

AG-KIUC have represented that they have no opposition to the Company's request for an extension of time to file correspondence responsive to AG-KIUC 1-1, 1-5, and 1-9 as detailed herein.

For these reasons, the Company respectfully requests a short extension of time through October 2, 2024 to file correspondence responsive to AG-KIUC 1-1, 1-5, and 1-9 as detailed herein.

WHEREFORE, Kentucky Power Company respectfully requests that the Commission enter an Order:

1. Granting the Company an extension of time through October 2, 2024 to file correspondence responsive to AG-KIUC 1-1, 1-5, and 1-9 as detailed herein; and
2. Granting such further relief to which the Company may be entitled.

Respectfully submitted,



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