

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

DATA REQUEST

AG_KIUC Provide copies of all proposals submitted in response to the three RFPs
1_1 issued on September 22, 2023 and all correspondence to and from
Kentucky Power related to those proposals.

RESPONSE

Please see KPCO_R_AG_KIUC_1_1_ConfidentialAttachment1 for the requested proposals.

The Company is reviewing documents potentially responsive to this request and will provide any relevant, non-privileged documents in a supplemental response no later than October 2, 2024.

October 2, 2024 Supplemental Response

Please see KPCO_SR_AG_KIUC_1_1_ConfidentialAttachment1 for the requested correspondence.

Witness: Zachary M. Yetzer

KPCO_SR_AG_KIUC_1_1_ConfidentialAttachment1 is redacted in its entirety.

DATA REQUEST

- AG_KIUC 1_5** 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.

RESPONSE

a.-d. The Company objects to this request on the basis that it mischaracterizes the Company’s testimony. Specifically, the Company has not made a decision to reject all [REDACTED] resource bids and continues to evaluate such bids. Subject to and without waiving this objection, the Company states it does not have any documents responsive to the request because it has made no such determination to reject all [REDACTED] resource bids.

The Company is reviewing documents potentially responsive to this request and will provide any relevant, non-privileged documents in a supplemental response no later than October 2, 2024.

October 2, 2024 Supplemental Response

a.-d. The Company objects to this request on the basis that it mischaracterizes the Company’s testimony. Specifically, the Company has not made a decision to reject all [REDACTED] resource bids and continues to evaluate such bids. Subject to and without waiving

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this objection, the Company states it does not have any documents responsive to the request because it has made no such determination to reject all [REDACTED] resource bids. Please see KPCO_SR_AG_KIUC_1_5_ConfidentialAttachment1 for the requested correspondence as it relates to the scope of the bids and the evaluation of the bids received.

Witness: Tanner S. Wolfram

Preparer: Counsel (as to the objections)

KPCO_SR_AG_KIUC_1_5_ConfidentialAttachment1 is redacted in its entirety.

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DATA REQUEST

AG_KIUC Provide a copy of all correspondence between the Company and either
1_9 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.

RESPONSE

The Company is reviewing documents potentially responsive to this request and will provide any relevant, non-privileged documents in a supplemental response no later than October 2, 2024.

October 2, 2024 Supplemental Response


Please see KPCO_SR_AG_KIUC_1_9_ConfidentialAttachment1 for the requested correspondence.

Witness: Tanner S. Wolfram

KPCO_SR_AG_KIUC_1_9_ConfidentialAttachment1 is redacted in its entirety.

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 October 1, 2024.



Notary Public



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

My Commission Expires N/A

Notary ID Number 11