

**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 Data Requests to the Attorney General of the Commonwealth of Kentucky and Kentucky Industrial Utility Customers, Inc.**

Pursuant to the Commission’s Order dated August 21, 2024, Kentucky Power Company propounds the following data requests to be answered by the Attorney General of the Commonwealth of Kentucky and Kentucky Industrial Utility Customers, Inc. (“AG-KIUC”):

**DEFINITIONS**

- “Document” means the original and all copies (regardless of origin and whether or not including additional writing thereon or attached thereto) of memoranda, reports, books, manuals, instructions, directives, records, forms, notes, letters, notices, confirmations, telegrams, pamphlets, notations of any sort concerning conversations, telephone calls, meetings or other communications, bulletins, transcripts, diaries, analyses, summaries, correspondence investigations, questionnaires, surveys, worksheets, and all drafts, preliminary versions, alterations, modifications, revisions, changes, amendments and written comments concerning the foregoing, in whatever form, stored or contained in or on whatever medium, including computerized memory or magnetic media.
- “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.

- “Person” means any natural person, corporation, professional corporation, partnership, association, joint venture, proprietorship, firm, or the other business enterprise or legal entity.
- A request to identify a natural person means to state his or her full name and residence address, his or her present last known position and business affiliation at the time in question.
- 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.), number or code number thereof or other means of identifying it, and its present location and custodian. If any such document was, but is no longer in the Attorney General’s possession or subject to its control, state what disposition was made of it.
- 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.
- “Identify” used in a fashion other than as described above means to provide in detail, including all assumptions, bases, facts considered, and rationale if not called for in another part of the data request, the requested information.
- “And” and “or” should be considered to be both conjunctive and disjunctive, unless specifically stated otherwise.
- “Each” and “any” should be considered to be both singular and plural, unless specifically stated otherwise.
- 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.
- “You” or “your” means the person whose filed testimony is the subject of these interrogatories and, to the extent relevant and necessary to provide full and complete answers to any request, “you” or “your” may be deemed to include any person with information relevant to any interrogatory who is or was employed by or otherwise associated with the witness or who assisted, in any way, in the preparation of the witness’ testimony.
- “Attorney General” means the Attorney General of the Commonwealth of Kentucky, the Attorney General’s Office of Rate Intervention, its employees, and/or its agents, including Lane Kollen and Leah J. Wellborn.
- “KIUC” means Kentucky Industrial Utility Customers, Inc., its employees, and/or its agents, including Lane Kollen and Leah J. Wellborn.
- “Company” means Kentucky Power Company.

- “AEP” means American Electric Power Company, Inc.

### **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 interrogatories are continuing in nature, and, without regard to the date created or obtained, 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 Kentucky Power. Any studies, evaluations, analyses, 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 interrogatory should be construed independently and not with reference to any other interrogatory herein for purpose of limitation.
4. The answers provided should first restate the question asked and also identify the person(s) supplying the information.
5. 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.
6. 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.
7. The interrogatories are to be answered under oath by the witness(es) responsible for the answer.
8. Please furnish any non-disclosure or other required for disclosure of any information or response for which confidential treatment provided.

## **DATA REQUESTS**

1. Please provide all schedules, tables, and charts included in the testimony and exhibits to the testimony of Lane Kollen in electronic format, with formulas intact and visible, and no pasted values.
2. Please provide all workpapers, source documents, and electronic spreadsheets used in the development of the testimony of Mr. Kollen. The requested information, if so available, should be provided in an electronic format, with formulas intact and visible, and no pasted values.
3. Refer to Mr. Kollen's Direct Testimony at 10-11. Please describe in detail all facts relied upon to support Mr. Kollen's assertion that the Commission should not authorize the Company to defer the costs of internal resource support because "[t]he costs of internal resource support are already included in the base revenue requirement and are not eligible for deferral and a second recovery in a future base rate case proceeding."
4. Refer to Mr. Kollen's Direct Testimony at 11. Please describe in detail all facts relied upon to support Mr. Kollen's assertion that the Commission should not authorize the Company to defer the costs of outside services because "[t]he costs of outside services already are included in the base revenue requirement."
5. Please provide all schedules, tables, and charts included in the testimony and exhibits to the testimony of Leah J. Wellborn in electronic format, with formulas intact and visible, and no pasted values.
6. Please provide all workpapers, source documents, and electronic spreadsheets used in the development of the testimony of Ms. Wellborn. The requested information, if so available, should be provided in an electronic format, with formulas intact and visible, and no pasted values.
7. If not provided in response to Data Request 6, please provide all workpapers, source documents, and electronic spreadsheets used in the development of each of the sensitivity analyses of the proposed REPA discussed in the testimony of Ms. Wellborn. The requested information, if so available, should be provided in an electronic format, with formulas intact and visible, and no pasted values.
8. Refer to Ms. Wellborn's Direct Testimony at 11. Please describe in detail all facts relied upon to support Ms. Wellborn's assertion that if the Company "contracted for the capacity and energy alone" this would result in lower pricing.

Respectfully submitted,



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COMPANY