

Kentucky Power Company
KPSC Case No. 2025-00175
Attorney General's Second Set of Data Requests
Dated September 8, 2025

DATA REQUEST

AG 2_1 Confirm that the Integrated Resource Plan (“IRP”) proposed by Kentucky Power in Case No. 2023-00092 is still under review by the Commission.

RESPONSE

At the time this request was made that was correct. However, the Commission issued the Staff Report in Case No. 2023-00092 on September 12, 2025.

Witness: Tanner S. Wolfram

Kentucky Power Company
KPSC Case No. 2025-00175
Attorney General's Second Set of Data Requests
Dated September 8, 2025

DATA REQUEST

AG 2_2 Confirm that the proposal here is inconsistent with the IRP referenced above, and therefore, that IRP is a nullity.

RESPONSE

The Company objects to this request on the basis that the term “nullity” is ambiguous, and that the request seeks information that is neither relevant to this proceeding nor reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving those objections, the Company states as follows:

The Company disagrees with, and therefore cannot confirm that, the IRP in Case No. 2023-00092 is “a nullity.” Resource planning, and therefore IRPs are “dynamic, ongoing process[es]”¹ and represent “a snapshot in time.”² Many factors result in differences between a preferred plan in an IRP and the resources selected to provide service. For example, as described in the Direct Testimony of Company Witness Wolffram, there were significant changes in the capacity market and environmental regulations during the period the Company submitted its IRP and when it was evaluating potential resource through its 2023 All-Source Request For Proposal. The fact that a utility’s ultimate resource planning decisions may not be completely consistent with the utility’s most recent IRP does not invalidate nor nullify the IRP, nor does it undermine the ultimate resource planning decisions.

Notwithstanding, the Company did take action to procure resources consistent with its Preferred Plan, including issuing an All-Source RFP in 2023. Please see the Company’s responses to KPSC 1_4 and KPSC 2_3 for additional discussion of the RFP process and results, including the events giving rise to this Application.

Witness: Tanner S. Wolffram

Respondent: Counsel as to objections.

¹ Staff Report at 4, *In the Matter of: Electronic 2023 Integrated Resource Plan of Big Rivers Electric Corporation*, Case No. 2023-00310 (Ky. P.S.C. Aug. 20, 2024); Staff Report at 3, *in the matter of: ELECTRONIC 2022 INTEGRATED RESOURCE PLANNING REPORT OF KENTUCKY POWER COMPANY*, Case No. 2023-00092 (Ky. P.S.C. Sept. 12, 2025).

² Staff Report at 3, *In The Matter Of: Electronic 2022 Integrated Resource Planning Report of Kentucky Power Company*, Case No. 2023-00092 (Ky. P.S.C. Sept. 12, 2025).

VERIFICATION

The undersigned, Tanner S. Wolffram, being duly sworn, deposes and says he is the Director of Regulatory Services for Kentucky Power, 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.


Tanner S. Wolfram

Commonwealth of Kentucky)
)
County of Boyd)

Case No. 2025-00175

Subscribed and sworn to before me, a Notary Public in and before said County
and State, by Tanner S. Wolfram, on September 16, 2025.

Marilyn Michelle Caldwell
Notary Public

My Commission Expires 5/7/2027

Notary ID Number KYNP71841

