

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF KENTUCKY	)	
POWER COMPANY FOR APPROVAL OF	)	CASE NO.
AFFILIATE AGREEMENTS RELATED TO THE	)	2021-00421
MITCHELL GENERATING STATION	)	

COMMISSION STAFF'S POST-HEARING REQUEST FOR INFORMATION  
TO KENTUCKY POWER COMPANY

Kentucky Power Company (Kentucky Power), pursuant to 807 KAR 5:001, shall file with the Commission an electronic version of the following information. The information requested is due no later than March 16, 2022. The Commission directs Kentucky Power to the Commission's July 22, 2021 Order in Case No. 2020-00085<sup>1</sup> regarding filings with the Commission. Electronic documents shall be in portable document format (PDF), shall be searchable, and shall be appropriately bookmarked.

Each response shall include the question to which the response is made and shall include the name of the witness responsible for responding to the questions related to the information provided. Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association or a governmental agency, be accompanied by a signed certification of the preparer or the person supervising the preparation of the response on behalf of the entity that the

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<sup>1</sup> Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID-19* (Ky. PSC July 22, 2021), Order (in which the Commission ordered that for case filings made on and after March 16, 2020, filers are NOT required to file the original physical copies of the filings required by 807 KAR 5:001, Section 8).

response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

Kentucky Power shall make timely amendment to any prior response if Kentucky Power obtains information that indicates the response was incorrect when made or, though correct when made, is now incorrect in any material respect. For any request to which Kentucky Power fails or refuses to furnish all or part of the requested information, Kentucky Power shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention shall be given to copied material to ensure that it is legible. When the requested information has been previously provided in this proceeding in the requested format, reference may be made to the specific location of that information in responding to this request. When applicable, the requested information shall be separately provided for total company operations and jurisdictional operations. When filing a paper containing personal information, Kentucky Power shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

1. Provide American Electric Power Service Corp.'s (AEPSC) Mitchell Power Plant (Mitchell) specific costs that are allocated to Kentucky Power that will no longer be allocated to Kentucky Power if the Commission approves Liberty Utilities Co.'s request to acquire Kentucky Power. Provide the amounts by FERC account and include a description of the expenses in each FERC account.

2. Provide copies of the Mitchell Operating Committee minutes between January 2021 and March 1, 2022.

3. Provide the senior executives who will resolve disputes for the Mitchell Operating Committee.

4. Provide the terminal net salvage for Mitchell realized by Kentucky Power between Kentucky Power's acquisition of an interest in Mitchell in Case No. 2012-00578<sup>2</sup> and January 2018, when terminal net salvage costs were removed from Mitchell depreciation rates consistent with a settlement approved in Case No. 2017-00179.<sup>3</sup>

5. Provide the terminal net salvage for Mitchell recovered from customers in rates between Kentucky Power's acquisition of an interest in Mitchell in Case No. 2012-00578 and January 2018, when terminal net salvage costs were removed from Mitchell depreciation rates consistent with a settlement approved in Case No. 2017-00179.

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<sup>2</sup> Case No. 2012-00578, *Application of Kentucky Power Company for (1) A Certificate of Public Convenience and Necessity Authorizing the Transfer to the Company of an Undivided Fifty Percent Interest in the Mitchell Generating Station and Associated Assets; (2) Approval of the Assumption by Kentucky Power Company of Certain Liabilities in Connection with the Transfer of the Mitchell Generating Station; (3) Declaratory Rulings; (4) Deferral of Costs Incurred in Connection with the Company's Efforts to Meet Federal Clean Air Act and Related Requirements; and (5) All Other Required Approvals and Relief* (Ky. PSC Oct. 7, 2013).

<sup>3</sup> Case No. 2017-00179, *Electronic Application of Kentucky Power Company for (1) A General Adjustment of Its Rates for Electric Service; (2) An Order Approving Its 2017 Environmental Compliance Plan; (3) An Order Approving Its Tariffs and Riders; (4) An Order Approving Accounting Practices to Establish Regulatory Assets and Liabilities; and (5) An Order Granting All Other Required Approvals and Relief* (Ky. PSC Jan. 18, 2018).

*Nancy Vinsel for*

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Public Service Commission  
P.O. Box 615  
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DATED MAR 03 2022

cc: Parties of Record

Case No. 2021-00421

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