

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

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| ELECTRONIC TARIFF FILING OF KENTUCKY |) | |
| POWER COMPANY FOR APPROVAL OF A |) | |
| SPECIAL CONTRACT UNDER ITS ECONOMIC |) | CASE NO. |
| DEVELOPMENT RIDER AND DEMAND |) | 2022-00424 |
| RESPONSE SERVICE TARIFFS WITH CYBER |) | |
| INNOVATION GROUP, LLC |) | |

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 August 4, 2023. The Commission directs Kentucky Power to the Commission's July 22, 2021 Order in Case No. 2020-00085¹ 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

¹ 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 or incomplete when made or, though correct or complete when made, is now incorrect or incomplete 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 and scanned 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. Refer to Kentucky Power's response to Joint Intervenor's Second Request for Information, Item 1(b). Explain how the load factor was calculated.

2. Refer to Kentucky Power's response to the Attorney General's First Request for Information, Item 23, Attachment 2. State whether the estimated load obligations include reserve margins. If so, provide the reserve margin used for each year and explain how they were determined.

3. Explain why a compliant Fixed Resource Requirement (FRR) plan meets the service adequacy requirements under Kentucky law, including KRS 278.030(2) and KRS 278.010(14).

4. Refer to the July 25, 2023 Hearing Video Transcript at 11:02:00–11:03:45. For the capacity purchases that Kentucky Power uses to satisfy its FRR plan, explain how energy is treated under the contract and where Kentucky Power reflects the associated energy in its rates.

5. Refer to Kentucky Power’s Tariff Economic Development Rider (EDR), Original Sheet No. 37-1. Explain when the provision of Terms and Conditions, Section 1 would apply and how it would be implemented.

6. Refer to Kentucky Power’s responses to Commission Staff’s First Request for Information (Staff’s First Request), Item 2, and Commission Staff’s Second Request for Information, Item 2. Provide the estimated cost of each of the upgrades identified in these responses.

7. Explain how Cyber Innovation Group, LLC and Kentucky Power communicated regarding service with Kentucky Power and provide a timeline from initial contact to the filing of the special contract with the Commission. For each step of the timeline, state the position of the primary representative of Kentucky Power.

8. Explain how capacity purchases flow through Rider Purchased Power Adjustment (PPA).

9. Refer to Kentucky Power’s response to Staff’s First Request, Item 1, Attachment 1, Tab “Summary” showing the estimated incremental capacity costs. Provide an Excel spreadsheet, with all formulas, rows, and columns unprotected and fully

accessible, showing the effect those capacity costs would have on the PPA rates reflected in Tab “Rev” in each year, assuming there are no other changes to the PPA rates.

10. Provide the percent increase in Kentucky Power’s PJM Load Serving Entity (LSE) Open Access Transmission Tariff (OATT) since 2015 on a year-to-year basis. Provide all supporting calculations and documentation in Excel spreadsheet format, with all formulas, columns, and rows unprotected and fully accessible.

11. Refer to Kentucky Power’s response to Staff’s First Request, Item 1, Attachment 1.

a. Provide a revised marginal cost analysis which uses the 2015-2022 escalation rate to forecast PJM LSE OATT expenses and includes an increased Tariff PPA rate commensurate with the increase in PJM LSE OATT expenses.

b. Provide an Excel spreadsheet, with all formulas, rows, and columns unprotected and fully accessible, showing the effect those PJM LSE OATT expenses would have on the PPA rates reflected in Tab “Rev” of Attachment 1 in each year, assuming there are no other changes to the PPA rates.

12. Explain how Kentucky Power has historically defined “new customer” for the purposes of Tariff EDR.



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DATED JUL 28 2023

cc: Parties of Record

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