

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

AN ELECTRONIC EXAMINATION OF THE)	
APPLICATION OF THE FUEL ADJUSTMENT)	CASE NO.
CLAUSE OF KENTUCKY POWER COMPANY)	2023-00008
FROM NOVEMBER 1, 2020 THROUGH)	
OCTOBER 31, 2022)	

COMMISSION STAFF'S INITIAL 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 on March 22, 2024. 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 the February 13, 2024 Hearing Testimony of Alex E. Vaughan (Hearing Video Transcript 11:32:13).

a. Provide all documentation, including but not limited to, monthly discussion documents, reports, summaries, meeting minutes, and correspondence, regarding Kentucky Power and American Electric Power (AEP) personnel discussions about coal inventory shortages during the review period.

b. Provide a timeline including:

(1) When and how Kentucky Power and AEP first had discussions about coal inventory concerns during the review period in the present case. Include in the response when Kentucky Power and AEP first became aware that PJM was concerned about coal inventory levels (potential full load burn hours).

(2) When and how PJM first contacted Kentucky Power about coal inventory issues during the review period in the present case.

(3) When and how Kentucky Power and AEP first responded to PJM regarding coal inventory concerns during the review period through Kentucky Power's ten-day rule implementation date in the present case.

2. Refer to February 13, 2024 Hearing Testimony of Alex E. Vaughan (Hearing Video Transcript 11:37:15).

a. Provide a copy of all versions of PJM Manual 13 that were in effect during the review period.

b. Identify any sections of PJM Manual 13 that Kentucky Power believed applied to coal inventory levels during the review period and that Kentucky Power believes required implementation of coal conservation strategy.

c. State how and when Kentucky Power and AEP responded to any changes to PJM Manual 13 regarding coal inventory requirements including documentation related to any decisions regarding its implementation.

d. Identify the carrying costs associated with maintaining coal in inventory and provide the total amount of carrying costs by category during the review period.

3. Refer to February 13, 2024 Hearing Testimony of Kimberly K. Chilcote (Hearing Video Transcript 13:37:15).

a. For the review period, identify and provide all coal contracts executed or in force, monthly deliveries received by contract along with burn projections, contract mine name and number.

b. Identify and provide any coal contracts in which the supplier failed to perform during the period under review and explain the suppliers' reasons for failing to perform.

4. Refer to the February 13, 2024 Hearing Testimony of Alex E. Vaughan (Hearing Video Transcript 14:20:02).

a. Explain what the proprietary Power Spark software does.

b. If possible, provide the equations in functional form (independent and dependent variable) and explain briefly the forecasting process used in Power Spark.

c. Explain how Kentucky Power could best demonstrate how Power Spark works.

5. Refer to the February 13, 2024 Hearing Testimony of Alex E. Vaughan (Hearing Video Transcript 14:22:16).

a. Provide any documents pertaining to the coal conservation adder, including but not limited to how the coal conservation adder is calculated, any documentation related to the Kentucky Power and AEP coal conservation adder committee, or PJM meeting minutes, reports, summaries, or communications.

b. Provide a timetable indicating when the AEP coal conservation committee was created and when and why the committee met.

6. Refer to the January 9, 2024 Order of the Public Service Commission of West Virginia in Case No. 23-0377-E-ENEC entered as Staff Exhibit No. 1 in the February 13, 2024 hearing.

a. Provide a copy of Post-Hearing Exhibit 2 referenced on page 9 of that Order.

b. Referencing the Post-Hearing Exhibit 2, provide the same requested information solely for Kentucky Power.

7. Refer to Kentucky Power's response to Commission Staff's Second Request for Information (Staff's Second Request), Item 2, Attachment 3.

a. Update the attachment to identify all dates in which the offer strategy resulted in avoiding a forced outage or falling below a ten-day coal supply inventory level over the entire October 2021 through November 2022 period.

b. For dates in which a forced outage was not avoided through the offer strategy, explain whether one of both Mitchell units were dispatched despite the market price adder and whether such that no coal was conserved.

8. Refer to Kentucky Power's response to Staff's Second Request, Item 6, Attachment 2.

a. Provide the calculations for annual coal inventory / full load burn and based upon those calculations, explain the decision process and what factors are considered in deciding to alter the coal inventory days.

b. State if and how Kentucky Power's coal burn forecast is different than demand calculations provided in Kentucky Power's most recent Integrated Resource Plan.

c. If not answered in part a, provide equations in functional form and a list of independent variables input into the modeling system to determine projected coal demand.

9. Provide the coal bid evaluation sheets by issuance date for the review periods from Case Nos. 2022-00036 and 2023-00263.

10. State whether Kentucky Power factors in expected revenue from sales of coal byproducts such as ash or gypsum when preparing coal bid solicitation evaluations. Provide the revenue amounts for any coal post combustion byproducts sold during the review period.

11. Provide a copy of any orders from other states that have reviewed AEP's operating company's coal conservation programs.

12. Provide documentation relating to maintenance personnel work schedules and planning as it relates to responding to maintenance requests on Sundays and holidays.

13. Provide all unit outage reports from November 1, 2020, through October 31, 2022.

14. Identify all Kentucky Power unit outages since February 1, 2022, by date and outage type.



Linda C. Bridwell, PE
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DATED FEB 29 2024

cc: Parties of Record

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