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October 11, 2012

Mark R. Overstreet  
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**HAND DELIVERED**

RECEIVED

Jeff R. Derouen  
Executive Director  
Public Service Commission  
211 Sower Boulevard  
P.O. Box 615  
Frankfort, KY 40602-0615

OCT 11 2012  
PUBLIC SERVICE  
COMMISSION

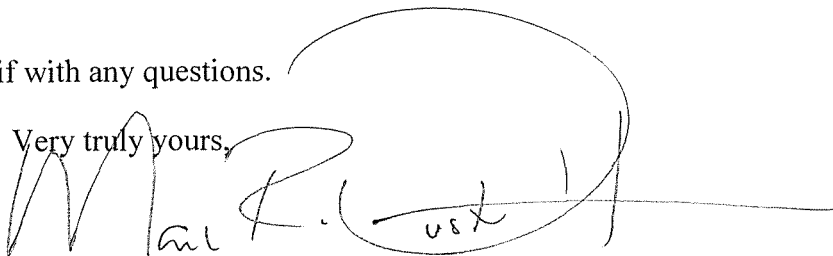
RE: Case No. 2012-00367

Dear Mr. Derouen:

Enclosed please find and accept for filing the original and ten copies each of Kentucky Power Company's Responses to the Data Requests of Staff and the Attorney General. By copy of this letter, the Responses also are being served on counsel for the Attorney General and Kentucky Industrial Utility Customers, Inc.

Please do not hesitate to contact me if with any questions.

Very truly yours,

  
Mark R. Overstreet

MRO

Enclosures

cc: Jennifer Black Hans  
Michael L. Kurtz

COMMONWEALTH OF KENTUCKY

RECEIVED

OCT 11 2012

PUBLIC SERVICE  
COMMISSION

BEFORE THE

PUBLIC SERVICE COMMISSION OF KENTUCKY

IN THE MATTER OF

APPLICATION OF KENTUCKY POWER COMPANY )  
TO AMEND ITS DEMAND-SIDE MANAGEMENT )  
PROGRAM AND FOR AUTHORITY TO IMPLEMENT )  
A TARIFF TO RECOVER COSTS AND NET LOST ) Case No. 2012-00367  
REVENUES AND TO RECEIVE INCENTIVES )  
ASSOCIATED WITH THE IMPLEMENTATION OF )  
THE PROGRAMS )

KENTUCKY POWER COMPANY RESPONSES TO COMMISSION  
STAFF'S FIRST SET OF DATA REQUESTS

October 11, 2012

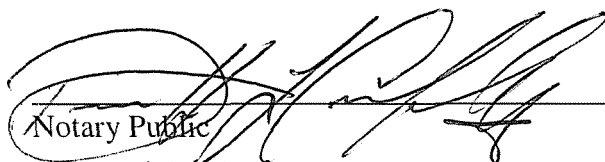
**VERIFICATION**

The undersigned, Edgar J. Clayton, being duly sworn, deposes and says he is the Manager, Energy Efficiency & Consumer Programs for Kentucky Power, that he has personal knowledge of the matters set forth in the forgoing responses for which he is the identified witness and that the information contained therein is true and correct to the best of his information, knowledge, and belief

  
Edgar J. Clayton

COMMONWEALTH OF KENTUCKY    )  
  ) CASE NO. 2012-00367  
COUNTY OF BOYD                    )

Subscribed and sworn to before me, a Notary Public in and before said County and State, by Edgar J. Clayton, this the 4 day of October 2012.

  
Notary Public  
ID. 440439

My Commission Expires: 4-5-2015

**VERIFICATION**

The undersigned, Lila P. Munsey, being duly sworn, deposes and says she is the Manager, Regulatory Services for Kentucky Power, that she has personal knowledge of the matters set forth in the forgoing responses for which she is the identified witness and that the information contained therein is true and correct to the best of her information, knowledge, and belief

*Lila P. Munsey*  
 Lila P. Munsey

COMMONWEALTH OF KENTUCKY     )  
 ) Case No. 2012-00367  
 COUNTY OF FRANKLIN             )

Subscribed and sworn to before me, a Notary Public in and before said County and State, by Lila P. Munsey, this 5th day of October 2012.

*Judy A. Rosquist*  
 Notary Public

My Commission Expires: *January 23, 2013*



## **Kentucky Power Company**

### **REQUEST**

Refer to the Joint Application ("Application") cover letter ("Letter"), page 2, which states, "[t]he forecasted participant levels for the Targeted Energy Efficiency program were reduced because of uncertainty in Community Action funding."

- a. Explain the reasons for the uncertainty surrounding the Community Action funding.
- b. Provide the actual level of Community Action and Company funding for calendar years 2010 and 2011 and the first half of 2012, and the projected funding for the second half of 2012 and calendar years 2013 and 2014.

### **RESPONSE**

- a. The Community Action Agencies receive funding for the Weatherization program from multiple sources, including Kentucky Power. Since 2009 the Community Action Agencies received ARRA stimulus funds to perform Weatherization projects. The ARRA funding concluded early in 2012. The absence of ARRA funding brought into question whether the Community Action Agencies may continue the Weatherization Assistance program at the existing participant levels, and whether the program could be operated for 12 months out of the year.

b.

**Community Action & Company Funding for Targeted Energy Efficiency Program**

Kentucky Power Funding \*

2010	\$	347,248
2011	\$	260,637
1st half - 2012	\$	173,271
2nd half - 2012 (est.)	\$	130,029
2013 (est.)	\$	272,700
2014 (est.)	\$	272,700

Community Action **	DOE funding	ARRA Funding	Total
FY 2010	\$ 1,369,295	\$ 5,028,311	\$ <b>6,397,606</b>
FY 2011	\$ 953,107	\$ 4,716,055	\$ <b>5,669,162</b>
FY 2012	\$ 612,669	\$ 4,833,644	\$ <b>5,446,313</b>
FY 2013 ***	\$ 610,447	N/A	\$ <b>610,447</b>

Community Action did not provide a 2014 forecast.

\* Kentucky Power operates on a Calendar year cycle.

\*\* Community Action operates on a Fiscal Year (FY) cycle. (7/1/xx - 6/30/xx)

\*\*\* In the past, the weatherization program has received funds from the LIHEAP program. A 15% transfer from LIHEAP to Weatherization could occur in DEC 2012 which would increase the DOE allocations for FY 13. The transfer has been approved but the dollar amount has not been determined.

**WITNESS:** E J Clayton





## **Kentucky Power Company**

### **REQUEST**

Refer to the Application Letter, page 2, which states, “[f]orecasted participant levels for resistance heat replacement in the High Efficiency Heat Pump program were reduced slightly to reflect customer response to the program for the period January through June 2012.” Explain whether there were any other programs that did not meet participation or program expenditure goals due to customer response to the program, for the period January through June 2012, that were not reduced.

### **RESPONSE**

Program goals are forecast on an annual rather than six-month basis. Although certain other programs did not meet participation or program expenditure goals for the first six months, the Company projects that they will meet their annual goals, and consistent with Company practice, the goals were not adjusted.

**WITNESS:** E J Clayton



## Kentucky Power Company

### REQUEST

Refer to the Application Letter, page 3, which states, “[a]s part of the program extension, the Company requests that the Commission approve the proposed revision to the existing Tariff R.C.L.M. to continue the program operation through 2013.”

- a. Refer to the proposed Tariff R.C.L.M. (Pilot Residential and Small Commercial Load Management), Availability of Service, which states, “[a]vailability is limited to the first 200 residential and 25 small commercial customers applying for service under this tariff or until 450 load control devices have been installed.” Also refer to Tariff R.C.L.M. (Pilot Residential and Small Commercial Load Management), in Case No. 2010-00198<sup>1</sup>, dated October 27, 2010, Availability of Service, which states, “[a]vailability is limited to the first 1,000 residential and 100 small commercial customers applying for service under this tariff or until 2,200 load control devices have been installed.” Explain why the availability has been revised from the first 1,000 residential to the first 200 residential customers, and from the first 100 small commercial customers to the first 25 small customers applying for service under this tariff, or until from 2,200 load control devices to 450 load control devices have been installed.
  
- b. Refer to the proposed Tariff R.C.L.M. (Pilot Residential and Small Commercial Load Management), Availability of Service, which states, “[t]his tariff will be in effect once the Company has successfully launched its Residential and Small Commercial Load Management Pilot program and will continue through December 31, 2013. Enrollment to participate in R.C.L.M. will end on February 28, 2013.” Also refer to Tariff R.C.L.M. (Pilot Residential and Small Commercial Load Management), in Case No. 2010-00198<sup>2</sup> dated October 27, 2010, Availability of Service, which states, “[t]his tariff will be in effect once the Company has successfully launched its Residential and Small Commercial Load Management Pilot program and will continue through December 31, 2012. Enrollment to participate in R.C.L.M. will end on December 31, 2012.” Explain why the tariff dated October 27, 2010 states enrollment to participate in R.C.L.M. will end on December 31, 2012 or last day of the year, and the proposed tariff states enrollment to participate in R.C.L.M. will end on February 28, 2013, not December 31.

- c. Refer to the proposed Tariff R.C.L.M. (Pilot Residential and Small Commercial Load Management) Sheet 23-3. Should the (N) on the right-side of the page be there?

**RESPONSE**

- a. The revised targets are based on the minimum levels necessary to complete the cost benefit and participant impact program evaluation and also to utilize the SMART gateway meter inventory.
- b. Ending the new customer enrollment on February 28, 2013 will allow customers to participate in the program during 2013. The Company will make an evaluation in the fall of 2013 whether the program should be continued, be replaced by an alternative solution, or discontinued.
- c. Yes. Sheet 23-3 was provided in the filing for informational purposes only and did not include any revisions at this time. It is a copy of what was previously approved by this Commission in Case No. 2010-00198 on October 27, 2010.

**WITNESS:** E J Clayton

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<sup>1</sup> Case No. 201 0-001 98, Joint Application Pursuant to 1994 House Bill No. 501 for the Approval of Kentucky Power Company Collaborative Demand-Side Management Programs and for Authority to Recover Costs, Net Lost Revenues and Receive Incentives Associated with the implementation of One New Combined Residential/Commercial and One Commercial Demand-Side Management Program Beginning August 2, 2010 (Ky. PSC Oct. 15, 2010)

<sup>2</sup> *Id.*



## Kentucky Power Company

### REQUEST

Refer to the Application Letter, pages 3 and 4, which states, “[t]he representatives of the BSADD and NKCA objected to the increased rates for residential customers required under the revised tariff, but otherwise supported the Company’s recommendations.” Pursuant to 278.285(1) (f) :

The extent to which customer representatives and the Office of the Attorney General have been involved in developing the plan including program design, cost recovery mechanisms, and financial incentives, and if involved, the amount of support for the plan by each participant, provided however, that unanimity among the participants developing the plan shall be required for the commission to approve the plan.

- a. Explain whether the Kentucky Power Collaborative (Collaborative”) has adopted by-laws. If the Collaborative has by-laws, provide a copy with the explanation.
- b. If the answer to a. is yes, explain whether the Collaborative’s by-laws require a unanimous or consensus vote.
- c. If the Collaborative’s by-laws require a unanimous vote, explain whether the Collaborative is in violation of its own by-laws.

### RESPONSE

- a. Yes, the Collaborative has adopted by-laws which are attached.
- b. The by-laws require a unanimous vote for Collaborative action.
- c. No. As stated in Ms. Munsey's transmittal letter of August 15, 2012, the report was filed by Kentucky Power. The report was not filed by the Collaborative.

**WITNESS:** E J Clayton

## KENTUCKY POWER COMPANY By-Laws of the DSM Collaborative

**Purpose:**

The intent of these by-laws is to govern the process for operational procedures of the Kentucky Power Demand-Side Management Collaborative.

**Article I                      Membership**

Membership in the Collaborative is to be representative of a cross-section of various customer groups / sub-groups of Kentucky Power Company (KPCO.), thus representing a significant customer block in the service territory. Representatives of customer groups shall be known as "customer members". There shall be no individual members.

*Section 1.*      Voting Members

The voting members of the Collaborative are:

**Residential Class**

- a.      **Community Action Kentucky***

Executive Director/CAK	Primary
Staff Member/CAK	Alternate
  
- b.      **Northeast Kentucky Community Action Agency***

Executive Director/NEKCAA	Primary
Staff Member/NEKCAA	Alternate
  
- c.      **Big Sandy Community Action Agency***

Executive Director/BSCAP	Primary
Staff Member/BSCAP	Alternate
  
- d.      **Middle KY Community Action Partnership, Inc.***

Executive Director/MKCAP	Primary
Staff Member/MKCAP	Alternate
  
- e.      **Gateway Community Action Council***

Executive Director/GCAC	Primary
Staff Member/GCAC	Alternate

*f. LKLP Community Action Council*

Executive Director/LKLP  
Staff member/LKLP

*g. Community Services*

Executive Director/LINKS Primary  
Representative/LINKS Alternate

Representative/BSADD Aging Primary  
Representative/BSADD Aging Alternate

*h. KY Housing Corporation*

Senior Weatherization Trainer Primary  
Staff Member KHC Alternate

*i. Office of the Attorney General, Kentucky*

Assistant Director/Atty General Primary  
Staff Member/Atty General Alternate

*j. Kentucky Power Company*

DSM Program Manager Primary  
Staff Member/KPCO Alternate

**Commercial Class**

*a. Office of the Attorney General, Kentucky*

Assistant Director/Atty General Primary  
Staff Member/Atty General Alternate

*b. Kentucky Power Company*

DSM Program Manager Primary  
Staff Member/KPCo Alternate

*c. Floyd County Schools*

Director of Facilities Primary  
Staff Member/Floyd Co. Schools Alternate



*d. Our Lady of Bellefonte Hospital*

Director of Facilities	Primary
Staff Member/OLBH	Alternate

**All Classes (Non-Voting)**

*a. Public Service Commission of Kentucky*

*b. American Electric Power Service Corporation*

*Section 2. New Members*

A petition for membership shall be made by filing a written request with the Kentucky DSM Collaborative. Applications for membership will be considered by the entire membership and new members may be added by unanimous approval of the Collaborative.

*Section 3. Duties of Membership*

Members will be responsible for the following:

- a. designating in writing one (1) voting representative and up to (2) alternates to represent a customer member;
- b. Attending Collaborative meetings in person, by proxy, or by telephone and participate in customer class sub-groups as needed;
- c. Staying informed on issues relating to DSM programs and activities;  
and
- d. Reviewing, recommending, and endorsing DSM programs for Kentucky Power Company.

*Section 4. Termination of Membership*

- a. Any member groups may voluntarily terminate their membership at any time by filing written notice with the Kentucky DSM Collaborative.
- b. Automatic termination shall occur if member fails to attend personally, by telephone, or by proxy three (3) consecutive meetings of the

Collaborative. The same rule shall apply to a failure to attend meetings for a customer class sub-group of which the member is representative. Any member who has been terminated under these conditions may apply for re-admission to the Collaborative and shall be readmitted only upon the unanimous vote of the members required by Article II(a) of these by-laws.

## **Article II**            **Voting Rights**

### *Section 1.*        Votes

- a. All votes require unanimous agreement for passage. Abstaining votes shall be considered agreement.
- b. Each member shall have one (1) vote to be cast by the authorized representative or designated alternate.
- c. Proxy votes may be made in writing. Only the authorized representative or designated alternate on file may submit proxy votes.

## **Article III**            **Decision Making**

### *Section 1.*        General Decision Making

- a. All members will vote on issues effecting Kentucky Power DSM programs, including Collaborative membership and rule-making. If a member is absent from a meeting and all other members present agree upon an item, the issue will be outlined in the meeting minutes, and the absent member will have ten (10) working days upon receipt of the minutes to present an objection to the issue, if necessary.

### *Section 2.*        Customer Class Sub-Groups

Residential  
Commercial

- a. There should be two customer class subgroups; residential and commercial. Each customer class sub-group will consider its own DSM programs and decide upon them by unanimous vote.

*Section 3.* Changes in Programs

- a. Once a program is established, the terms of the program may be changed only by unanimous consent of the voting members who considered and/or created it.
- b. Kentucky Power Company will operate in good faith all programs approved by the Collaborative. However, if Kentucky Power Company determines that the continued operation of a program is not in the best interest of the Company, the program will be terminated by the Company after notifying the DSM Collaborative.

**Article IV**                    **Dispute Resolution**

*Section 1.* In the event unanimous decision cannot be reached, the members shall determine whether the impasse is informational or policy-based.

*Section 2.* In the event an informational dispute exists, the Collaborative or customer class sub-group may agree on an expert to analyze the disputed information and advise them as to what is accurate.

*Section 3.* If a policy dispute should occur, the Collaborative or customer class sub-group may secure an outside facilitator to assist the group with reaching an acceptable agreement.

*Section 4.* No action will be taken by the Collaborative or Customer class subgroup without unanimous agreement. Abstaining votes shall be considered agreement.

**Article V**                    **Leadership**

*Section 1.* The Kentucky Power Company DSM representative will convene and preside at Collaborative meetings and customer class sub-groups meetings.

**Article VI**                    **Meetings**

*Section 1.* Meetings of the Collaborative shall be held at least once per quarter.

*Section 2.* Customer class sub-groups may meet monthly or more frequently at the call of the KPCo DSM representative or at least two (2 ) members of the Collaborative or

customer class sub-group. However, each customer class sub-group must meet once per quarter.

*Section 3.* Written notice shall be given to all members at least five (5) working days before a meeting, providing the date, time, and location of that meeting. The five (5) day notice period may be waived by affected members in respect of any meeting.

*Section 4.* Minutes of all Collaborative meetings shall be kept and circulated by a person designated by the Collaborative.

## **Article VII**                    **Contracts, Consultants, and Administration**

*Section 1.* Costs for consultants and other outside entities retained by a customer class sub-group(s) shall be recovered only from that customer class.

*Section 2.* Contracts between the Collaborative, consultants, and outside entities shall be signed by the Company as agent of the customer class sub-group(s) and that all parties to the Collaborative sub-group(s) shall have access to information submitted by the Company, consultant, or outside entity.

*Section 3.* Information used for Collaborative efforts which is identified by the Company as being of a proprietary nature shall not be transmitted outside the Collaborative or their agents without signed permission by the Company.

## **Article VIII**    **Amendment**

1. A proposed amendment of these by-laws shall be made in writing only by a member and the full text of the proposed amendment shall be sent to all members of the Collaborative at least thirty (30) days prior to the meeting at which the vote will be taken upon the proposed amendment.
2. An amendment of these by-laws shall be made only upon the unanimous consent of all Collaborative members.



**Kentucky Power Company**

**REQUEST**

Refer to the Demand-Side Management (“DSM”) Collaborative Status Report (“Status Report”) of the Application, Section 1, page 1, under COMMENTS. Provide the location of Exhibit E in the Application.

**RESPONSE**

Exhibit E refers to Exhibit E of the original application filed in Case No. 95-427 on September 27, 1995. Please see page 2 of this response for a copy of Exhibit E.

**WITNESS:** E J Clayton

EXHIBIT E

KENTUCKY POWER COMPANY  
 DERIVATION FOR THREE-YEAR DSM EXPERIMENT  
 COLLABORATIVE AGREED UPON INITIAL VALUES

PROGRAM DESCRIPTIONS	EFFICIENCY INCENTIVE \$/PARTICIPANT *	MAXIMIZING INCENTIVE ##	NET LOST REVENUE/YEAR KWH/PARTICIPANT **	NET LOST REVENUES \$/KWH #
<u>RESIDENTIAL</u>				
Energy Fitness	78.22	N/A	2,690	0.03114
Targeted Energy Efficiency - All Electric	0.00	SEE ##	5,570	0.03113
- Non All Electric	9.71	N/A	680	0.03124
Compact Fluorescent Bulb	1.58	N/A	62	0.03097
High-Efficiency Heat Pump - Resistance Heat	19.73	N/A	2,275	0.03112
- Non Resistance Heat	16.69	N/A	813	0.03114
High-Efficiency Heat Pump - Mobile Home	38.85	N/A	2,160	0.03111
Mobile Home New Construction	N/A	SEE ##	N/A	N/A
<u>Commercial</u>				
SMART Audit -- Class 1	N/A	SEE ##	N/A	N/A
SMART Audit -- Class 2	N/A	SEE ##	N/A	N/A
SMART Financing -- Existing Building	506.34	N/A	22,000	0.04267
SMART Financing -- New Building	50.33	N/A	30,600	0.04267
<u>Industrial</u>				
SMART Audit -- Class 1	N/A	SEE ##	N/A	N/A
SMART Audit -- Class 2	N/A	SEE ##	N/A	N/A
SMART Financing -- General	178.65	N/A	28,200	0.04108
SMART Financing -- Compressed Air System	4,850.21	N/A	164,800	0.05271

\* Efficiency incentive defined as 15% of estimated net savings based on the TRC test.

# Net lost revenues per kWh where net revenues are defined as gross revenues minus variable costs based on the company's current rates in effect.

\*\* These annual kWh per participant values reflect (exclude) the estimated effects of free-riders in each program.

## The maximizing incentive is defined as 5% of actual program costs.





## Kentucky Power Company

### REQUEST

Refer to the Status Report, page 8, under COMMENTS. It states, “[t]he participant and expense forecast for 2012 is 175 resistance heat replacement customers, 475 non-resistance heat replacement customers and \$292,500 respectively.” Also, refer to Exhibit C, page 18A-1, where Resistance Heat Replacements and Heat Pump Replacement are listed under High Efficiency Heat Pump. Confirm whether non-resistance heat replacement on page 8 of the Status Report is the same as Heat Pump Replacement on page 18A-1 of Exhibit C.

### RESPONSE

Yes. The "non-resistance heat replacement" on page 8 of the Status Report is the same as Heat Pump Replacement on page 18A-1 of Schedule C. The program description has been updated on Schedule C to reflect Non-Resistance Heat Replacement. See KPSC 1-35 for updated Schedule C to reflect the change in program description.

	Sch. C	Participants	Program Costs
High Efficiency Heat Pump			
- Resistance Heat Replacement	18 A-1	88	40,050
	18 B-1	40	17,793
	18 C-1	<u>47</u>	<u>20,907</u>
		175	78,750
- Non Resistance Heat Pump Replacement	18 A-1	217	101,250
	18 B-1	143	62,355
	18 C-1	<u>115</u>	<u>50,145</u>
		475	213,750
- Resistance Heat Replacement			78,750
- Non Resistance Heat Pump Replacement			<u>213,750</u>
			292,500

WITNESS: E J Clayton



## Kentucky Power Company

### REQUEST

Refer to the Commercial Incentive Program ("CIP") Evaluation of the Executive Summary, Section 2, page IV. It states, "[i]n 2011, eighteen (18) lighting projects were completed through the Commercial Incentive Program at a higher cost per participant than originally budgeted due to high fixed costs independent of program participation."

- a. Explain the types of high fixed costs.
- b. Confirm whether the program is cost-effective.
- c. Taking into consideration the high fixed costs, explain what level of participation is needed for the program to be cost-effective.

### RESPONSE

- a. The term "high fixed costs" refers to administrative expenses that are incurred independently of the number of participants. Many of these are one-time start-up and implementation expenses. The work was done primarily by KEMA, which served as the Company's implementation contractor. These expenses include:
  - (i) Program design, including work to define program eligibility, to select products, to determine incentive levels, to design customer applications, and to identify program processes;
  - (ii) Program tracking, including the establishment of data collection requirements, tracking, and reporting systems;
  - (iii) Training Kentucky Power and program allies;
  - (iv) information technology services; and
  - (v) marketing.

- b. The program currently is not cost-effective. Based upon the analysis performed by Applied Energy Group, Inc., (AEG) the Company believes the program can become cost-effective on a going forward basis under some combination of the conditions described at page vi of Section 2 of the Company's August 15, 2012 application. Those conditions were:

At the level of 2011 actual expenditures the program will be cost-effective and pass the Total Resource Cost (TRC) test if there are 88 completed projects and each project saves on average 25,000 kWh and 5.5 kW; or

If the program can achieve at least the originally projected ratio of administrative costs to incentives paid and participants on average save at least 25,000 kWh and 5.5 kW.

Kentucky Power notes that the many of the "high fixed costs" may not be incurred in the future, thereby helping to make the program cost-effective.

- c. Please see the response to subpart (b) above.

**WITNESS:** E J Clayton



**Kentucky Power Company**

**REQUEST**

Refer to the CIP Evaluation, Section 2, page iv. It states, "Applied Energy Group, Inc. ("AEG") recommends that KEMA increase the local staff by at least one employee. Four (4) KEMA staff members worked remotely from Michigan until the local representative was hired in September 2011 ." Explain whether one additional KEMA staff member would increase the current high fixed costs.

**RESPONSE**

Based on input from the implementation contractor, the addition of one local staff member would be offset by the reduction of one remote staff member, and thus there would be no additional fixed cost.

**WITNESS:** E J Clayton



## **Kentucky Power Company**

### **REQUEST**

Refer to the CIP Evaluation, Section 2, page vii. It states, “[t]he program does not operate as designed.” Identify what efforts Kentucky Power is currently undertaking to ensure internal controls are improved relative to evaluation, measurement, and verification of each DSM program in its portfolio.

### **RESPONSE**

The Company manages 14 residential and commercial DSM programs utilizing best known practices supported by two full-time local KPCo DSM employees and American Electric Power Service Corporation (AEPSC) personnel. The Company is evaluating proposals to contract for an implementation contractor to provide turn-key project management and incentive processing for five DSM programs. The additional contracting resource would allow the KPCo staff to provide improved oversight of the entire DSM portfolio, including contractor administration of site inspections and the program application process as outlined in Section 2 of the Commercial Incentive evaluation.

**WITNESS:** E J Clayton





**Kentucky Power Company**

**REQUEST**

Refer to the CIP Evaluation, Section 2, page viii. It states, “[i]n 2012, the Commercial Incentive Program will consist of three programs: Prescriptive and Custom Incentives (current program), Express Program, and the New Construction Program.” Explain whether Kentucky Power is seeking Commission approval for the Express Program and the New Construction Program.

**RESPONSE**

The Commercial Incentive Program, which was approved in Case 2010-00198, included the following components, the Prescriptive and Custom Incentives, Express (also known as Direct Install), and the New Construction. The different names help in marketing and managing different components of the same commercial program. Because of the prior approval of the Commercial Incentive Program, Kentucky Power is not seeking approval of its component parts.

**WITNESS:** E J Clayton



**Kentucky Power Company**

**REQUEST**

Refer to the CIP Evaluation, Section 2, page viii. It states, “[n]ew construction could also be available by auditing the design plans and identifying energy saving measures.” In the Application of Case No. 2010-00198<sup>3</sup>, within the DESCRIPTION of the proposed Commercial Incentive Program, it states, “[n]ew construction could also be available by auditing the design plans and identifying energy saving measures.” Explain whether new construction is currently part of the CIP and have there been any new construction participants since the program was approved.

**RESPONSE**

The New Construction component began October 2011 and is part of the overall Commercial Incentive program. Four applications from potential participants have been received.

**WITNESS:** E J Clayton

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<sup>3</sup> Case No. 2010-00198 (Ky. PSC Oct. 15, 2010).



**Kentucky Power Company**

**REQUEST**

Refer to the CIP Evaluation, Section 2, page viii. It states, "AEG recommends that KPCO consider increasing incentives to 60 to 70 percent of the installed equipment costs. Incentives are currently capped at 50 percent of the incremental material costs, the same as the current Commercial Incentive Program prescriptive and custom incentives." If incentives were increased to 60 to 70 percent, from the current 50 percent, explain the impact the programs cost-effectiveness and the ability to encourage participation in the program.

**RESPONSE**

The Total Resource Cost Test (TRC) cost-effectiveness is not affected by customer incentives. The Company expects increased incentives will encourage participation. Direct install programs typically offer small nonresidential customers higher incentives and occasionally, financing for the remaining portion of the installation cost. Small commercial customers are a hard-to-reach market because of their limited access to capital to invest in energy efficiency improvements. Higher incentives are utilized to increase participation and access to the program.

**WITNESS:** E J Clayton



**Kentucky Power Company**

**REQUEST**

Refer to the CIP Evaluation, Section 2, page 2, Table 1. Explain the increase in Contractor Administration and Evaluation from 2010 to 2012.

**RESPONSE**

The original program budget and contractor administrative expense increased from 2010 to 2012 because of the increasing target participant and energy saving goals over the same time period.

**WITNESS:** E J Clayton





**Kentucky Power Company**

**REQUEST**

Refer to the CIP Evaluation, Section 2, page 23. It states, "Kentucky Power specific inputs, including avoided costs, discounts rates, participation and incentives, were used to conduct the cost-effectiveness analysis." Explain whether Kentucky Power's environmental costs were taken into consideration.

**RESPONSE**

No. Environmental costs were not included in the analysis.

**WITNESS:** E J Clayton



**Kentucky Power Company**

**REQUEST**

Refer to the CIP Evaluation, Section 2, page 27. It states, “[g]oing forward, it is vital that either participation goals be met or program administrative costs be reduced for the Commercial Incentive Program to reach acceptable cost effectiveness levels.” Explain how this might be achieved.

**RESPONSE**

The Company monitors program administrative costs, participation goals, and cost effectiveness levels on a continuing basis. The Company is currently evaluating proposals from three vendors following issuance of an August 20, 2012 Request for Proposal for "turn-key" program services, with the aim of enhancing the program's cost effectiveness levels.

**WITNESS:** E J Clayton



**Kentucky Power Company**

**REQUEST**

Refer to the Residential and Small Commercial Heating Ventilation/Air Conditioning Diagnostic and Tune-up Program ("HVAC Diagnostic and Tune-up Program") Evaluation of the Executive Summary, Section 3, page v. It states, "[t]he three most active HVAC dealers performed 69 percent of the diagnostic and tune-up services." Also, refer to page 15, Table 9, explain why one vendor received 445 of the 1,142 HVAC systems rebated

**RESPONSE**

The Company does not select vendors to be reimbursed. Instead, subject to program limits and guidelines, all qualified rebate applications that are submitted are paid. The vendor that received 445 rebates submitted 445 qualified rebate applications for the program.

**WITNESS:** E J Clayton



## Kentucky Power Company

### REQUEST

Refer to the HVAC Diagnostic and Tune-up Program Evaluation, Section 3, page vii. It states the following:

AEG recommends that Kentucky Power hire an implementation contractor to implement Kentucky Power's residential and small commercial HVAC programs, including, but not limited to, the Residential and Small Commercial HVAC Diagnostic and Tune-up Program, the Small Commercial Heat Pump/Air Conditioner Incentive Program, the Residential High Efficiency Heat Pump Program, Mobile Home High Efficiency Heat Pump, and Mobile Home New Construction.

- a. Explain whether there has ever been an implementation contractor for the Residential High Efficiency Heat Pump Program, Mobile Home High Efficiency Heat Pump Program, and Mobile Home New Construction Program.
- b. Explain why an implementation contract is needed now for programs that have been in place for many years and have already experienced participation.

### RESPONSE

- a. The Residential High Efficiency Heat Pump Program, Mobile Home High Efficiency Heat Pump Program, and the Mobile Home New Construction Program have been managed in-house by Kentucky Power staff since their inception. These programs have not had an implementation contractor.
- b. Kentucky Power's Energy Efficiency programs have grown since inception. In 2009, Kentucky Power processed approximately 1,350 customer, dealer and vendor payments. Five new programs were added in 2010. In 2011, Kentucky Power processed approximately 4,450 payments. With each evaluation of an energy efficiency program, the evaluator recommends changes to improve the program. The scope of work for Kentucky Power staff has increased as recommendations from program evaluations have been implemented. Kentucky Power plans to utilize an implementation contractor to process customer and dealer incentive payments.

**WITNESS: E J Clayton**





## **Kentucky Power Company**

### **REQUEST**

Refer to the HVAC Diagnostic and Tune-up Program Evaluation, Section 3, page vii. It states, "AEG recommends that Kentucky Power and the implementation contractor consider modifying the HVAC Diagnostic and Tune-up Programs: Reduce the participating HVAC dealer incentives to \$25 (from the current \$50 incentive); remove central air conditioner tune-ups from the program offering; and reduce the customer incentive to \$30 (from the current \$50 incentive)."

- a. Explain whether Kentucky Power has surveyed or personally contacted HVAC contractors about reducing incentives to \$25 from \$50 and whether or not it would impact their willingness to participate in the program.
- b. Explain whether Kentucky Power has surveyed or personally contacted residential and commercial customers who have participated in the program as to whether reducing the incentives to \$30 from \$50 would have influenced their decision to participate in the program.

### **RESPONSE**

- a. Yes. Kentucky Power contracted with AEG to survey HVAC contractors and provide recommendations on results. The Company has not implemented the program change pending approval of the recommendations by the KPSC. Kentucky Power administers direct outreach through phone calls and on-site meetings.
- b. Yes. Kentucky Power contracted with AEG to survey residential and commercial customers and provide recommendations on results. The Company has not implemented the program change pending approval of the recommendations by the KPSC.

**WITNESS:** E J Clayton



**Kentucky Power Company**

**REQUEST**

Refer to the HVAC Diagnostic and Tune-up Program Evaluation, Section 3, page viii. It states, “[n]ote that these modifications may not be necessary if there are program budgetary changes or changes to Kentucky Power’s avoided costs.” Explain what budgetary changes would be required.

**RESPONSE**

The Company expects that some combination of changes to program offerings, incentive levels, or program budgets would increase cost-effectiveness.

**WITNESS:** E J Clayton



## Kentucky Power Company

### REQUEST

Refer to the HVAC Diagnostic and Tune-up Program Evaluation, Section 3, page viii. It states the following:

AEG recommends additional modifications to reduce free ridership: Modify customer eligibility. Customers are currently eligible for a rebate every 3 years, this should be extended to every 5 years to correspond with the measure life of the services; Require the customer to submit the rebate application. Other than receiving the diagnostic and tune-up service, the customer does not have to take any action to receive the incentive; and KPCO market directly to residential customers and encourage HVAC dealers to market to customers that do not consistently receive these tune-up services.

Kentucky Power has budgeted \$9,000 for promotion for 2010-2012.

- a. Explain how the \$9,000 annual promotion budget has been used to promote this program.
- b. Explain how Kentucky Power proposes to promote this program in the future.

### RESPONSE

- a. Most of the program's annual promotion budget has been spent on newspaper advertisements to educate the public about the program. The program has also been promoted by utilizing non-DSM Kentucky Power resources to send information letters to HVAC dealers, to issue bill inserts promoting the program, to create promotional Fact Sheets to be given to customers and HVAC dealers, to update the Kentucky Power website, and to update the Customer Service Call Center scripts for call-in customers.
- b. Kentucky Power plans to continue to promote this program through direct dealer outreach, bill inserts, and radio, newspaper and other media advertisements.

**WITNESS:** E J Clayton



**Kentucky Power Company**

**REQUEST**

Refer to the Residential and Small Commercial Load Management Pilot Program (“Load Management Pilot Program”) Evaluation of the Executive Summary, Section 4, page v. Explain whether there is an installation contractor in Kentucky Power’s southern territory.

**RESPONSE**

No, Consert Inc., the program manager, does not have an installation contractor in Kentucky Power's southern territory.

**WITNESS:** E J Clayton





**Kentucky Power Company**

**REQUEST**

Refer to the Load Management Pilot Program Evaluation, Section 4, page 33. It states, “[o]f the 55 customers that contacted Kentucky Power customer solution center, 67 percent did not sign the agreement to participate in the program. There was no follow-up to determine why these customers did not sign the agreement.” Explain whether Kentucky Power is contacting customers that do not participate in the program as to why.

**RESPONSE**

The program vendor Consert Inc. followed-up with calls and email to non-participating customers.

**WITNESS:** E J Clayton



## **Kentucky Power Company**

### **REQUEST**

Refer to the Residential Efficient Products Program Evaluation of the Executive Summary, Section 5, page vii. It states, “[t]he Field Representative should conduct more frequent in-store promotions for these retailers.” Explain whether independent retailers are being personally contacted by a field representative and whether Kentucky Power believes the benefit of more frequent in-store promotions would be cost effective.

### **RESPONSE**

A field representative is contacting independent retailers in an effort to reduce barriers to entry. Although Kentucky Power has not conducted a formal cost-effectiveness evaluation, the minimal additional expense required to contact independent retailers leads the Company to believe the effort will not materially affect the cost-effectiveness of the program.

**WITNESS:** E J Clayton



**Kentucky Power Company**

**REQUEST**

Refer to the Residential Efficient Products Program Evaluation of the Executive Summary, Section 5, page viii. It states, "AEG recommends that the in-store instant coupons be modified to collect only the product information that Walmart/Lowe's stores collect." Explain whether in-store instant coupons are to be modified so as not to be a barrier to independent retailers.

**RESPONSE**

Based upon recommendation from AEG and Applied Proactive Technologies (APT), the in-store coupons have been modified to reduce this issue as a barrier to entry for independent retailers. The APT field representative personally delivered the modified coupons to the independent retail stores participating in the program.

**WITNESS:** E J Clayton



## Kentucky Power Company

### REQUEST

Refer to the Residential Efficient Products Program Evaluation, Section 5, page 30. It states the following:

Remove incentives for LED holiday lights, LED nightlights and ENERGY STAR ceiling fans. Kentucky Power did not achieve any sales of LED nightlights, LED holiday lights and ENERGY STAR ceiling fans. Additionally, APT noted that the market for LED holiday lights and LED night lights has already transformed and purchases of ceiling fans are based on aesthetic preferences.

Explain whether Kentucky Power is considering removing LED holiday lights, LED nightlights, and ENERGY STAR ceiling fans from the program.

### RESPONSE

After recommendations from and discussions with AEG and APT, Kentucky Power will remove LED holiday lights, LED nightlights and ENERGY STAR ceiling fans from the program, subject to approval from the Public Service Commission.

**WITNESS:** E J Clayton





**Kentucky Power Company**

**REQUEST**

Refer to the Small Commercial Heat Pump/Air Conditioner (“HP/AC”) Incentive Program of the Executive Summary, Section 6, page iii. Identify when the impact evaluation will be completed to determine energy and demand savings for this program.

**RESPONSE**

The impact evaluation of the Small Commercial Heat Pump/Air Conditioner (“HP/AC”) Incentive Program is complete. See the information below from Tables 13 and 19 of the evaluation report:

**Energy Savings, 2011**

<b>Measure</b>	<b>NTG Ratio</b>	<b>Net Summer Savings (kW)</b>	<b>Net Winter Savings (kW)</b>	<b>Net Energy Savings (kWh)</b>	<b>TRC</b>
<b>Program Total</b>	<b>78%</b>	<b>1.774</b>	<b>8.708</b>	<b>24,634</b>	<b>0.73</b>

**WITNESS:** E J Clayton



## **Kentucky Power Company**

### **REQUEST**

Refer to the Small Commercial HP/AC Incentive Program of the Executive Summary, Section 6, page vii. It states the following:

AEG recommends that Kentucky Power hire an implementation contractor to implement Kentucky Power's residential and small commercial HVAC programs, including, but not limited to, the Residential and Small Commercial HVAC Diagnostic and Tune-up Program, the Small Commercial Heat Pump/Air Conditioner Incentive Program, the Residential High Efficiency Heat Pump Program, Mobile Home High Efficiency Heat Pump, and Mobile Home New Construction.

Explain whether an implementation contractor would be cost effective.

### **RESPONSE**

The High Efficiency Heat Pump program, the Mobile Home High Efficiency Heat Pump program and the Mobile Home New Construction program were found to be cost effective in the last evaluations. The Small Commercial Heat Pump/ Air Conditioner Incentive program and the HVAC Diagnostic and Tune-up program (Residential and Commercial) are identified in the evaluations as being cost effective if recommended program changes are implemented. Hiring an implementation contractor would increase the marketing efforts for each program, reach a broader customer base and ensure the programs are operated in a cost effective manner.

## **Kentucky Power Company**

Kentucky Power has a small staff to run and oversee numerous energy efficiency programs. The residential and small commercial HVAC programs are run by KPCo staff. KPCo staff is responsible for marketing and promotional activities, including visiting participating and potential HVAC dealers across the KPCo territory, processing rebate applications, tracking rebate applications and performing QA/QC inspections.

The residential and small commercial HVAC programs share many similar components, including marketing and promotional activities and data tracking systems, as well as the same participating HVAC dealers. An implementation contractor is expected to be cost-effective due to the ability to capitalize on the similarities of the HVAC programs and contractor expertise, as well as the ability to increase the efficiency of program processes.

**WITNESS:** E J Clayton



## **Kentucky Power Company**

### **REQUEST**

Refer to the Small Commercial HP/AC Incentive Program Evaluation, Section 6, page vii. It states, “[d]ue to limited resources, Kentucky Power has not yet conducted an inspection to ensure services are being performed properly.”

- a. Identify when Kentucky Power will conduct inspections to ensure services are properly performed.
- b. Explain how Kentucky Power can verify demand and energy savings when such inspections have not been performed.
- c. Identify any other of Kentucky Power’s DSM programs where inspections are required to verify demand and energy savings but have not been completed.

### **RESPONSE**

- a. The Company anticipates contracting with an implementation contractor by the end of the first quarter of 2013 to perform the inspections. If an implementation contractor were hired, Kentucky Power anticipates that inspections could proceed at regular intervals beginning in the first quarter of the contractor's retention.
- b. Applied Energy Group conducted site inspections as part of the evaluation process to verify savings. Inspections by Kentucky Power staff are conducted to verify the accuracy of the information provided by the HVAC contractor on the rebate applications and not the savings.
- c. On-site inspections by Kentucky Power staff are not used to verify demand and energy savings. Inspections by Kentucky Power staff are conducted to verify the accuracy of the information provided by the HVAC contractor on the rebate applications.

**WITNESS:** E J Clayton





**Kentucky Power Company**

**REQUEST**

Refer to the Small Commercial HP/AC Incentive Program Evaluation, Section 6, page 14, Table 10. Explain why one vendor received 13 of the 24 HVAC systems rebated.

**RESPONSE**

The Company does not select vendors to be reimbursed. Instead, subject to program limits and guidelines, all qualified rebate applications that are submitted are paid. The vendor that received 13 of the 24 rebates submitted 13 qualified rebate applications for the program.

**WITNESS:** E J Clayton



**Kentucky Power Company**

**REQUEST**

Refer to the Small Commercial HP/AC Incentive Program Evaluation, Section 6, page 22. Identify where the definition of "EERb" is listed on page 23. Provide any necessary corrections.

**RESPONSE**

The definition of EERb was mistakenly listed as EERe. The definition should read:

EERb = Energy Efficiency Ratio of the baseline equipment

EERe = Energy Efficiency Ratio of the energy efficiency equipment

Please see page 2 of this response for the revised page.

**WITNESS:** E J Clayton

$$HP \text{ Winter Demand Impacts} = \frac{kBtu}{h} \times \left( \frac{1}{HSPFb} - \frac{1}{HSPFe} \right) \times CF$$

Where:

- Tons* = capacity of equipment in tons of cooling capacity
- kBtu/h* = capacity of equipment in kBtu per hour
- SEERb* = Seasonal Energy Efficiency Ratio of the baseline equipment
- SEERe* = Seasonal Energy Efficiency Ratio of the energy efficiency equipment
- EERb* = Energy Efficiency Ratio of the baseline equipment
- EERe* = Energy Efficiency Ratio of the energy efficiency equipment
- HSPFb* = Heating Seasonal Performance Factor of the baseline equipment
- HSPFe* = Heating Seasonal Performance Factor of the energy efficiency equipment
- EFLHc* = cooling mode equivalent full load hours
- EFLHh* = heating mode equivalent full load hours
- CF* = coincidence factor

Gross impacts were calculated for each individual heat pump and central air conditioner system rebated. Individual project gross impacts and total gross impacts by equipment type are detailed in the tables below.

**Table 11 Gross Savings per Unit, 2011**

Measure	Number of Units	Gross Summer Savings per Unit (kW)	Gross Winter Savings Per Unit (kW)	Gross Energy Savings per Unit
Split HP 13 SEER 11 EER 4 Tons	1	0.00	0.59	1,189
Split HP 13 SEER 13 EER 3 Tons	1	0.22	0.44	892
Split HP 15 SEER 10.6 EER 2 Tons	2	0.00	0.29	860
Split HP 15 SEER 12.5 EER 3 Tons	1	0.09	0.36	992
Split HP 15 SEER EER 3 Tons	1	0.00	0.44	1,291
Split HP 15 SEER 12.5 EER 4 Tons	2	0.18	0.59	1,721
Split HP 15 SEER 12.5 EER 5 Tons	1	0.22	0.90	2,480
Split HP 15 SEER 12.5 EER 5 Tons	1	0.22	0.82	2,318
Split HP 15 SEER 13 EER 4 Tons	2	0.30	0.90	2,357
Split HP 15.75 SEER 13 EER 2.5 Tons	1	0.18	0.37	1,178
Split HP 16 SEER 11.1 EER 1.5 Tons	2	0.00	0.22	726
Split HP 16 SEER 10.6 EER 2 Tons	1	0.00	0.29	968
Split HP 17.5 SEER 10 EER 2.5 Tons	2	0.00	0.74	2,137
Split HP 19 SEER 11.2 EER 1.5 Tons	1	0.00	0.54	1,562
Packaged HP 13 SEER 7.7 EER 3 Tons	1	0.00	0.44	892
Packaged HP 14 SEER 11.5 EER 3.5 Tons	1	0.00	0.51	1,290
Split AC 13 SEER 11.5 EER 5 Tons	1	0.15	0.00	356
Packaged AC SEER EER 6 Tons	1	0.18	0.00	427
Packaged AC 14 SEER 11.5 EER 2 Tons	1	0.06	0.00	142

**Table 12 Total Gross Demand and Energy Savings, 2011**

Measure	Gross Summer Savings (kW)	Gross Winter Savings (kW)	Gross Energy Savings (kWh)
Heat Pumps	1.88	11.16	30,656
Central Air Conditioners	0.39	-	926
<b>Program Total</b>	<b>2.27</b>	<b>11.16</b>	<b>31,582</b>



**Kentucky Power Company**

**REQUEST**

Refer to the Small Commercial HP/AC Incentive Program Evaluation, Section 6, page 26. It states, “[t]he 2012 Kentucky Power Company capacity cost is \$6/kw-year, compared to a PJM average of over \$100/kw-year.” Explain how Kentucky Power determined the capacity costs and provide the calculations used to arrive at those amounts.

**RESPONSE**

The “\$100/kW-yr.” capacity cost was incorrectly labeled in the identified excerpt from the evaluation report. It should have been labeled as “\$100/MW-day.” It is the PJM market price.

As a participant in PJM, currently through the AEP East Operating Pool mechanism, the value of (avoided) summer capacity to KPCo (\$6.01/kW-yr in 2012) is also the PJM market price.

**WITNESS:** E J Clayton



## Kentucky Power Company

### REQUEST

Refer to the Small Commercial HP/AC Incentive Program Evaluation, Section 6, page 41, Appendix D.

- a. Explain how the Participant Discount Rate was calculated.
- b. Provide in electronic format with formulas unprotected, workpapers and any other information showing how the Participant Discount Rate was calculated.
- c. Identify and explain any difference(s) in how the Participant Discount Rate was computed as compared to how Kentucky Power computed the discount rate (Cost of Capital) in its last rate case, Case No. 2009-00459.<sup>4</sup>

### RESPONSE:

- a. The Participant Discount Rate ("PDR") is the rate at which program participants would value their capital. The PDR does not take into consideration the utility's capital. Therefore, the PDR may vary from the discount rate used in other tests. A discussion of this is included in the National Action Plan for Energy Efficiency (NAPEE), "Understanding Cost-Effectiveness of Energy Efficiency Programs" Section 4.6 "Net Present Value and Discount Rates." Kentucky Power Company utilizes a Participant Discount Rate that corresponds to a 3-6 year simple payback, depending on measure life.
- b. Please see the enclosed CD for the workpapers calculating the PDR in electronic format.
- c. As discussed in subpart (a) above, the two discount rate calculations are not comparable.

**WITNESS:** E J Clayton

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<sup>4</sup> Case No. 2009-00459, Application of Kentucky Power Company for a General Adjustment of Electric Rates (Ky. PSC June 28, 2010).





## Kentucky Power Company

### REQUEST

From the following table, explain the change in efficiency incentives from the previous DSM filing, by program.

Program	Current 2012 Incentives per New Participant	Previous 2012 Incentives per New Participant <sup>5</sup>	Difference
Target Energy Efficient			
-All Electric	\$107.19	\$92.81	\$14.38
-Non-All-Electric	(\$63.48)	\$92.81	(\$156.29)
High Efficiency Heat Pump			
-Resistance Heat Replacement	\$39.30	\$226.74	(\$187.44)
-Heat Pump Replacement	\$88.56	\$226.74	(\$138.18)
HVAC Diagnostic & Tune-Up			
-Air Conditioner	(\$5.36)	\$1.31	(\$6.67)
-Heat Pump	(\$0.78)	\$11.38	(\$12.16)
Commerical A/C & Heat Pump Program			
-Air Conditioner Replacement	(\$29.05)	\$0.93	(\$29.98)
-Heat Pump Replacement	(\$9.19)	\$58.10	(\$67.29)
HVAC Diagnostic & Tune-Up			
-Air Conditioner	(\$6.78)	\$7.24	(\$14.02)
-Heat Pump	(\$0.35)	\$29.56	(\$29.91)
Commercial Incentive	(\$242.10)	\$633.90	(\$876.00)

## Kentucky Power Company

### RESPONSE

The incentives for the Target Energy Efficient Products and High-Efficiency Heat Pump programs did not change. Rather, the incentives identified in the Company's February 2012 filing were misreported because of an error. The correct incentives for the programs were reported in the Company's August 2012 filing.

The incentives for the remaining programs were adjusted to reflect the new impact measures that were obtained through the evaluations.

**WITNESS:** E J Clayton

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<sup>5</sup>Case No. 2012-00051, Joint Application Pursuant to 1994 House Bill No. 501 for the Approval of Kentucky Power Company Collaborative Demand-Side Management Programs and for Authority to Implement a Tariff to Recover Costs, Net Lost Revenues, and Receive Incentives Associated with the Implementation of Kentucky Power Company Collaborative Demand-Side Management Programs (Ky. PSC May 30, 2012).



**Kentucky Power Company**

**REQUEST**

Provide, in electronic format with formulas intact and cells unprotected, the kWh impacts by participant for each program.

**RESPONSE**

Please see enclosed CD for an electric copy of the kWh impacts by participant for each program.

**WITNESS:** E J Clayton



**Kentucky Power Company**

**REQUEST**

Provide, in electronic format with formulas intact and cells unprotected, Exhibit C.

**RESPONSE**

An electronic copy of Exhibit C with formulas intact and cells unprotected is provided on the enclosed CD.

**WITNESS:** Lila P Munsey