

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

RIVERSIDE GENERATING COMPANY, L.L.C.	)	
	)	
COMPLAINANT	)	
V.	)	CASE NO.
	)	2017-00472
KENTUCKY POWER COMPANY	)	
	)	
DEFENDANT	)	

COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION TO  
KENTUCKY POWER COMPANY

Kentucky Power Company ("Kentucky Power"), pursuant to 807 KAR 5:001, is to file with the Commission the original and an electronic version of its responses to the following information, with a copy to all parties of record. The information requested herein is due on or before June 1, 2018. Responses to requests for information in paper medium shall be appropriately bound, tabbed, and indexed. Each response 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 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 it obtains information, which indicates that 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, it 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 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 Direct Testimony of Ranie K. Wohnhas (“Wohnhas Testimony”) at page 6, lines 9–15. State whether it is Mr. Wohnhas’ testimony that if the lands upon which the Zelda and Foothills generating facilities are located are leased from different legal entities, then those two generating facilities cannot be classified as being “owned by the same individual business entity,” as that phrase is set forth in Kentucky Power’s Tariff N.U.G.

2. Refer to the Wohnhas Testimony, page 8, lines 5–12. Provide examples of meter inputs and outputs for a 15-minute period and the netting referenced on these lines. One example should show a net input, and the other example should show a net output. For each example, include the usage for each of the meters and the itemized

amounts that would be billed to Riverside Generating Company, LLC ("Riverside") for that 15-minute period.

3. Refer to the Wohnhas Testimony, page 16, line 20, through page 17, line 6. State whether the \$1.1 million per year referenced in the testimony represents the total annual amount billed to Riverside or only the energy portion of the annual amount billed to Riverside. If the former, confirm that, if the Commission were to determine that Riverside is qualified to remote self-supply under Tariff N.U.G, Kentucky Power would not receive revenues for customer or demand charges.

4. State whether it is Kentucky Power's belief that no common-owned generating units located adjacent to each other would qualify to remote self-supply under Tariff N.U.G.

5. State whether Kentucky Power includes the self-supply provision in Tariff N.U.G. because PJM Interconnection LLC ("PJM") recognizes that Station Power may be remotely self-supplied by member generators and the concept is included in PJM's Open Access Transmission Tariff. If that is not the case, please explain.



Gwen R. Pinson  
Executive Director  
Public Service Commission  
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DATED **MAY 16 2018**

cc: Parties of Record

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