

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 POST-HEARING 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 October 5, 2018. Responses to requests for information in paper medium shall be appropriately bound, tabbed and indexed. Responses to requests for information in paper medium shall be appropriately bound, tabbed, and indexed. Electronic documents shall be in portable document format (PDF), shall be searchable and shall be appropriately bookmarked. 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. Kentucky Power's Tariff Non-Utility Generator (Tariff N.U.G.), including the remote self-supply provision, was originally submitted and approved in September 2001. Identify those Kentucky Power affiliates, if any, that implemented tariffs that are similar Kentucky Power's Tariff N.U.G. during that time period.

2. Identify those Kentucky Power affiliates, if any, that currently have a tariff schedule that is similar to Kentucky Power's Tariff N.U.G. Provide a copy of those tariffs.

3. Provide a citation to the legal authorities that Kentucky Power relies upon to establish non-utility generator self-supply requirements that are different than those required under the PJM Interconnection, LLC Open Access Transmission Tariff.

4. State whether the Zelda and Foothills sites are interconnected to Kentucky Power's system pursuant to a single interconnection agreement or separate interconnection agreements. Provide a copy of the agreement(s).



Gwen R. Pinson  
Executive Director  
Public Service Commission  
P.O. Box 615  
Frankfort, KY 40602

DATED SEP 21 2018

cc: Parties of Record

\*David S Samford  
Goss Samford, PLLC  
2365 Harrodsburg Road, Suite B325  
Lexington, KENTUCKY 40504

\*M. Evan Buckley  
Goss Samford, PLLC  
2365 Harrodsburg Road, Suite B325  
Lexington, KENTUCKY 40504

\*Kentucky Power Company  
855 Central Avenue, Suite 200  
Ashland, KY 41101

\*Katie M Glass  
Stites & Harbison  
421 West Main Street  
P. O. Box 634  
Frankfort, KENTUCKY 40602-0634

\*Honorable Mark R Overstreet  
Attorney at Law  
Stites & Harbison  
421 West Main Street  
P. O. Box 634  
Frankfort, KENTUCKY 40602-0634