COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF KENTUCKY POWER COMPANY FOR (1) A GENERAL ADJUSTMENT OF ITS RATES FOR ELECTRIC SERVICE; (2) APPROVAL OF TARIFFS AND RIDERS; (3) APPROVAL OF ACCOUNTING PRACTICES TO ESTABLISH REGULATORY ASSETS AND LIABILITIES; (4) APPROVAL OF A CERTIFICATE OF PUBLIC CONVENIENCE AND NECESSITY; AND (5) ALL OTHER REQUIRED APPROVALS AND RELIEF	)	CASE NO. 2020-00174

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

Kentucky Power Company (Kentucky Power), pursuant to 807 KAR 5:001, is to file with the Commission an electronic version of the following information. The information requested herein is due on September 30, 2020. The Commission directs Kentucky Power to the Commission's March 16, 2020 and March 24, 2020 Orders in Case No. 2020-00085[1] regarding filings with the Commission. The Commission expects the original documents to be filed with the Commission within 30 days of the lifting of the current state of emergency. All responses 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.

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[1] Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID-19* (Ky. PSC Mar. 16, 2020), Order at 5–6. Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID-19* (Ky. PSC Mar. 24, 2020), Order at 1–3.

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 Kentucky Power obtains information that indicates 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 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 application, Exhibit E, page 210 of 216, Tariff E.D.R., which states that the customer will choose the order of the demand discounts at the time of the contract filing. Explain how Kentucky Power will define "at the time of the contract filing."

2. Refer to Kentucky Power's response to Commission Staff's Third Request for Information (Staff's Third Request), KPCO_R_KPSC_3_1_Attachment27 _VaughanWP13.xlsx, Tab ADJ-Calc, and to the application in Case No. 2020-00062.[2] Footnote 12 on page 10 of the 2020-00062 application states that AEP Kentucky Transmission Company, Inc. (Kentucky Transco) will be installing equipment in conjunction with Kentucky Power that is necessary for the project to be completed.

a. Explain the decision rules that were applied for how the various components of the project outlined in Case No. 2020-00062 are apportioned between Kentucky Power and Kentucky Transco.

b. Explain whether the same rules are and have been applied to past projects for which both Kentucky Power and Kentucky Transco participated jointly.

c. For the projected costs in the 2020-00062 application, provide an explanation of how those costs and the amounts attributable to Kentucky Power would be categorized or allocated to the FERC accounts in the Tab ADJ-Calc.

d. For the project elements listed in the 2020-00062 application, footnote 12, explain (1) whether Kentucky Transco recovers its capital and other costs through PJM, and if not, (2) explain how it recovers the capital and other costs and how

[2] Case No. 2020-00062, *Electronic Application of Kentucky Power Company For A Certificate Of Public Convenience And Necessity To Construct A 138 KV Transmission Line And Associated Facilities In Pike And Floyd Counties, Kentucky,* (filed Sept. 3, 2020).

those project element costs attributable to Kentucky Transco would be categorized or allocated to the FERC accounts in the Tab ADJ-Calc.

e. For the project elements listed the 2020-00062 application, footnote 12.

(1). Explain how the noncapital costs of completing the entire project will be apportioned between Kentucky Power and Kentucky Transco; and

(2). Explain how those costs would be categorized or allocated to the FERC accounts listed in Tab ADJ-Calc, if at all.

f. Regarding the Affiliated and Non-Affiliated classifications in the FERC accounts listed in Tab ADJ-Calc, explain how the AEP regulated utilities, the AEP Transcos, and any other AEP company would be classified. For example, are the AEP Transcos all Non-Affiliated and regulated AEP operating companies Affiliated?

g. Refer to Kentucky Power's response to Commission Staff's Fourth Request for Information (Staff's Fourth Request), Items 95.h-i.

(1). Explain whether the responses mean that Kentucky Transco's project expenses (such as those referenced in 2020-00062) that cannot be allocated to one or more zones are allocated across the AEP zone as NITS Expenses Transco ATRR; and

(2). Explain whether Kentucky Power's project expenses that cannot be allocated to more than one zone are allocated across the AEP zone through NITS expenses OpCo ATRR.

h. Confirm and explain whether:

(1). All of the capital expenditures on Kentucky Transco's books are the result of expenditures incurred in conjunction with Kentucky Power transmission related projects as described in Case No. 2020-00062; and

(2). That Kentucky Transco has not undertaken any project capital expenditures in Kentucky that were independent of and not in conjunction with a Kentucky Power transmission related project.

i. If Kentucky Transco has undertaken projects in Kentucky independently and that were not in conjunction with a Kentucky Power project, provide a listing and description of what projects and project components were and are currently being completed and a detailed description of each project, and whether that project impacts Kentucky Power's operations, if at all.

j. For each and every Kentucky Power project for which Kentucky Transco participated in any way, provide the following:

(1). The Case Number (if applicable);

(2). A complete description of the project components;

(3). What parts were undertaken by Kentucky Power and by Kentucky Transco; and

(4). The total costs, the capital costs attributable to Kentucky Power and to Kentucky Transco, and which costs are allocated to the FERC accounts making up the OATT expenses allocated back to Kentucky Power.

k. For each Kentucky Power project in which Kentucky Transco participated in any way, confirm that but for Kentucky Transco, the entire amount of project expenses would have been on Kentucky Power's books.

l. Refer to Kentucky Power's response to Staff's Third Request, KPCO_R_KPSC_3_1_Attachment27_VaughanWP13.xlsx, Tabs ADJ-Calc and 2020 Rates.

(1). For accounts 4561005 and 4561002, explain why the test year amounts do not change for the Annualized 2020 Rates.

(2). For account 5650012, explain how a test-year expense decrease of $1,140,098 becomes an annualized expense increase of $8,898,999.

(3). Explain whether Schedule 12 Expenses (RTEP) amounts are always allocated to account 5650012 only. If not, explain how these expenses are allocated to which FERC accounts.

m. Refer to Kentucky Power's response to Staff's Fourth Request, Item 96, Attachment2.xlsx, Tab 2020. Explain why the Sum of Loads for January 31, 2019 (19,110.444), does not match the AEP (Including CRES) MW amount (19,101) in KPCO_R_KPSC_3_1_Attachment27_VaughanWP13.xlsx, Tab 2020 Rates.

n. Refer to Kentucky Power's response to Staff's Third Request, KPCO_R_KPSC_3_1_Attachment27_VaughanWP13.xlsx, Tabs ADJ-Calc and 2020 Rates. Explain how the FERC account amounts in the Annualize 2020 Rates column in Tab ADJ-Calc would be traced back to Kentucky Power's share of Schedule 12 RTEP, OpCo ATRR, and TransCo ATRR categories in Tab 2020 Rates.

3. Refer to Kentucky Power's response to Staff's Fourth Request, Item 3. Explain how the customer is notified if an additional or subsequent deposit is charged.

4. Refer to Kentucky Power's response to Staff's Fourth Request, Item 6, which discusses how Kentucky Power will recover costs from a city or town that requests or requires the installation of underground facilities.

a. If Kentucky Power's preferred method of recovery is billing the city or town upfront for the cost differential, explain why Kentucky Power cannot just recover the cost from the city or town over a period of time instead of adding it to the bills of the residents of the city or town when a city or town is not able to pay the costs upfront.

b. If the costs are negotiated to be paid over an amount of time, provide the carrying charge Kentucky Power will charge.

5. Refer to Kentucky Power's response to Staff's Fourth Request, Item 13.

a. Refer to KPCO_R_KPSC_4_13_Attachment 1.xlsx. Provide support for estimated installed cost and maintenance cost for each light option.

b. Refer to KPCO_R_KPSC_4_13_Attachment2.xlsx.

(1). Refer to the support for the monthly maintenance charge amounts of the flexible lighting option under Tariff SL. The support provided appears to show an average monthly maintenance cost of $2.52, yet Kentucky Power is only proposing a monthly maintenance charge of $2.23. Explain why Kentucky Power is proposing an amount lower than the average monthly maintenance cost.

(2). Provide support for the estimated installed cost, maintenance cost, and removal cost for each light option.

6. Refer to Kentucky Power's response to Staff's Fourth Request, Item 15.

a. For the past three calendar years, provide the commitment status for each of Kentucky Power's generating units each day.

b. For the past three calendar years, provide the number of days each Kentucky Power resource was offered in and selected in the day-ahead market. Also, provide the number of days by unit.

c. For the past three calendar years, provide the number of days each Kentucky Power resource was offered in and not selected in the day-ahead market. Also, provide the number of days by unit.

d. For the past three calendar years, provide the number of days each Kentucky Power resource was offered in and not selected in the day-ahead market, but Kentucky Power nevertheless subsequently self-scheduled the resource. Also, provide the number of days by unit.

7. Refer to Kentucky Power's response to Staff's Fourth Request, Item 15(b). Provide the number of days Kentucky Power self-scheduled its units and made off system sales. For each instance, provide the details of the transaction, including, but not limited to, the counter-party, the price sold, and the cost to produce and transmit the energy. Any response should also explain the reasoning for the Company's decision to self-schedule, and separately, to conduct off system sales.

8. Refer to Kentucky Power's response to Staff's Fourth Request, Item 15(c), which states that "the Company . . . sells into PJM all of its scheduled generation resources" and that "the Company performs an hourly economic dispatch analysis where the lowest cost resources are used to service internal load customers." Confirm that Kentucky Power's response is predicated on its resource(s) being at or below the security-constrained marginal market price, or LMP. If not confirmed, explain to what degree and

how often Kentucky Power dispatches its own units to serve native load at a marginal cost above the price at which Kentucky Power could buy from PJM at prevailing LMP.

9. Refer to Kentucky Power's response to Staff's Fourth Request, Item 16, which discusses the deletion of the Monthly Billing Demand and Monthly Billing Energy sections of Kentucky Power's Non-Utility Generator Tariff.

a. Explain whether Kentucky Power would still propose deleting these two sections if it were not deleting the provisions for Startup Power Service.

b. Confirm that the removal of these sections would have no effect on the billing of customers taking service under the Non-Utility Generator Tariff. If not confirmed, explain why not.

10. Refer to Kentucky Power's response to Staff's Fourth Request, Item 23. With respect to the demand and energy allocation factors, the Excel attachments illustrate that the factors are indeed the same for jurisdictional and non-jurisdictional sales. Provide the demand and energy allocations for poles, transformers, and conductors for the 2017 and 2020 cost of service studies, and if not the same, explain the differences.

11. Refer to Kentucky Power's response to Staff's Fourth Request, Item 29. Provide a breakout of the $19.5 million in net revenue that can be attributed to each of the residential, commercial, and industrial customer classes.

12. Refer to Kentucky Power's response to Staff's Fourth Request, Items 35 and 39. Kentucky Power's answers are unresponsive. Even though Value Line Investment Survey (Value Line) may classify all the proxy group companies as electric utilities, there are large differences between each of the companies and with Kentucky Power both in terms of revenues and lines of business. Kentucky Power is not a regulated

combination electric and gas company, is not involved with natural gas storage or distribution or gas liquids exploration or pipeline transportation; it does not own nuclear generation, it has no non-regulated lines of business, and it has no foreign operations. All of these other lines of business present risks that are not applicable to Kentucky Power and that serve to differentiate these companies from Kentucky Power.

a. For each company in the proxy group, provide the total revenue from operations for 2019 as well as the amount and percentage of 2019 revenue derived from regulated electric utility U.S. operations, non-regulated U.S. operations, and foreign operations.

b. Provide an updated proxy group after the elimination of regulated combination gas and electric companies.

c. Explain Value Line's criteria for categorizing a company as an electric utility.

d. Explain the threshold of a company's non-regulated electric utility operations would be such that it would preclude it from being classified as an electric utility by Value Line.

13. Refer to Kentucky Power's response to Staff's Fourth Request, Item 52. Provide an explanation for the Moody's credit downgrade from Baa2 to Baa3.

14. Refer to Kentucky Power's response to Staff's Fourth Request, Item 67. Confirm or deny that transmission costs are an increasing relative portion of Kentucky Power's operating costs. If confirmed, elaborate on factors driving this change.

15. Refer to Kentucky Power's response to Staff's Fourth Request, Item 70. The response is non-responsive. Provide the cost of the basic service charge using the

same methodology as was used to calculate the basic service charge in Case No. 2017-00179[3] in Exhibit AEV-2.

16. Refer to Kentucky Power's response to Staff's Fourth Request, Item 75.

a. Explain the benefits associated with promoting EV charging during off-peak times.

b. Provide any studies or load data that Kentucky Power has collected on EV charging times.

17. Refer to Kentucky Power's response to Staff's Fourth Request, Item 82, KPCO_R_KPSC_4_82_Attachment1.xlsx. Explain why the kWh received can be greater than the kWh delivered.

18. Refer to Kentucky Power's response to Staff's Fourth Request for Information, Item 86, which discusses the basis for avoided energy costs. Also, refer to the Commission's June 28, 1984 Order in Case No. 8566.[4]

a. On pages 23–24 of the Commission's June 28, 1984 Order in Case No. 8566, regarding avoided energy costs, the Commission stated that "[i]t was generally agreed that avoided energy costs would be equal to the costs of operating the most expensive unit on line in the relevant time period." Explain how using the PJM Locational Marginal Price to set avoided energy costs complies with the Commission's Order in Case No. 8566.

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[3] Case No. 2017-00179, *Electronic Application of Kentucky Power Company for (1) A General Adjustment of Its Rates for Electric Service; (2) An Order Approving its 2017 Environmental Compliance Plan; (3) An Order Approving its Tariffs and Riders; (4) An Order Approving Accounting Practices to Establish Regulatory Assets and Liabilities; and (5) An Order Granting All Other Required Approvals and Relief* (Ky. PSC Jan. 18, 2018).

[4] Case No. 8566, *Setting Rates and Terms and Conditions of Purchase of Electric Power from Small Power Producers and Cogenerators by Regulated Electric Utilities* (Ky. PSC June 28, 1984)

b. On page 33 of the Commission's June 28, 1984 Order in Case No. 8566, the Commission required each utility "to record and file in a machine readable format 8760 hours of historical system lambdas for its system operation during the previous calendar year. Furthermore to insure a proper interpretation of these lambdas an explanation of events (i.e., retirements, new units, etc.) which may create non-representative situations in the calendar year should be provided by the utility with the lambdas." While Kentucky Power received a deviation from filing these reports in Case No. 8566-A,[5] the Commission required that Kentucky Power maintain its records so that the reports would be available if the Commission requested them. For each of the previous five calendar years, provide the report of the historical system lambdas for Kentucky Power's system operation.

19. Refer to Kentucky Power's response to Staff's Fourth Request, Item 87, regarding Kentucky Power's proposal to close its Non-Utility Generator Tariff to new customers. Explain why Kentucky Power being a member of PJM would have an effect on its offering of a Non-Utility Generator Tariff.

20. Refer to Kentucky Power's response to Staff's Fourth Request, Item 95.l. and Case No. 2020-00062. If capital expenditures are not an input into the FERC approved formula rates of either Kentucky Power or Kentucky Transco, using the project described in Case No. 2020-00062, and if not already answered previously, explain what project expenses will be inputs into the FERC approved formula rates.

21. Refer to Kentucky Power's response to Staff's Fourth Request for Information, Item 97. Confirm that the response indicates that the Winter and Annual

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[5] Case No. 8566-A, *Setting Rates and Terms and Conditions of Purchase of Electric Power from Small Power Producers and Cogenerators by Regulated Electric Utilities* (Ky. PSC March 31, 2000)

peak demands listed in Kentucky Power's Integrated Resource Plan, Section 6 page 185 of 2268 are non-coincident peak demands and not coincident peak demands.

22. Refer to Kentucky Power's response to Staff's Fourth Request for Information, Item 99, regarding the special coal provisions in Tariff C.S.-I.R.P. Provide a list of the coal accounts that ceased operations while committing to provide interruptible capacity as a PJM capacity resource under the lower, two year contract term and indicate at what point in the term of their contract they ceased operations.

23. Refer to Kentucky Power's response to Staff Fourth Request, Item 101, which discusses the calculation of the Loss Adjustment (Potential Loss Savings) and to Kentucky Power's response to Commission Staff's First Request for Information in Case No. 2017-00179, Item 73, and KPCO_R_KPSC_1_71_Attachment73_AEVWP3_Rate_Design.xlsx. In Case No. 2017-00179, Kentucky Power used the Energy Compound Loss Factor instead of just the Primary Energy Loss amount to calculate the Loss Adjustment (Potential Loss Savings). Explain why the Loss Adjustment (Potential Loss Savings) was calculated differently in the instant proceeding.

24. Refer to Kentucky Power's response to Staff's Fourth Request, Item 102, KPCO_R_KPSC_4_102_ConfidentialAttachment1.xlsx, regarding support for the On-Peak and Off-Peak Avoided Energy Costs (2020-2022 Average). Also, refer to Kentucky Power's response to the Commission's April 28, 2020 Order in Case No. 2020-00134,[6] Exhibit 1.

[6] Case No. 2020-00134, *Electronic Investigation of Kentucky Power Company's Deviation from 807 KAR 5:054, Section 5(1)(A) and (2)* (filed May 15, 2020).

a. Explain the discrepancies between the amounts listed in KPCO_R_KPSC_4_102_ConfidentialAttachment1.xlsx and Exhibit 1 of Kentucky Power's response to the Commission's April 28, 2020 Order in Case No. 2020-00134.

b. Provide a narrative explanation of how the amounts in KPCO_R_KPSC_4_102_ConfidentialAttachment1.xlsx were derived, as well as a schedule, in Excel spreadsheet format with all formulas intact and unprotected and with all columns and rows accessible, with detailed information showing how the amounts were derived.

25. Refer to Kentucky Power's response to Staff's Fourth Request, Item 111, in regards to any changes in assumptions and methods of calculation of the Cogeneration rates between Case No. 2017-00179 and the instant proceeding. Also, refer to Kentucky Power's response to Staff's Fourth Request, Item 1, KPCO_R_KPSC_3_1_Attachment15 _VaughanWP1.xlsx and Kentucky Power's response to Commission Staff's First Requests for Information in Case No. 2017-00179, Item 73, KPCO_R_KPSC_1_73 _Attachment73_AEVWP3_Rate_Design.xlsx.

a. Under I. Assumptions, explain why the estimated unit life changed from 30 years in Case No. 2017-00179 to 40 years in the instant proceeding.

b. Explain the addition of the Capacity Factor of 25 percent in the calculation of Operation & Maintenance Cost per kW (2020 Dollars).

26. Refer to Kentucky Power's response to Staff's Fourth Request, Item 94b, regarding the Fixed Operation and Maintenance Cost Escalation Rate. Also, refer to Kentucky Power's response to Staff's Fourth Request, Item 110, KPCO_R_KPSC_4_110 _Attachment1.xlsx. Also, refer to Kentucky Power's response to Commission Staff's First

Request for Information in Case No. 2017-00179, Item 73, KPCO_R_KPSC_1_73 _Attachment73_AEVWP3_Rate_Design.xlsx.

a. Explain why Kentucky Power only used 22 years in the instant proceeding in the Calculation of Cost Escalation Rates.

b. In Case No. 2017-00179, Kentucky Power used the result of the Calculation of Cost Escalation Rates as the Fixed Operation and Maintenance Cost Escalation Rate and Construction Cost Escalation Rate. Explain why Kentucky Power used two percent in the instant proceeding for those amounts instead of the result of the Calculation of Cost Escalation Rates.

27. Provide the hotel and meal expenses for American Electric Power (AEP) and Kentucky Power employees that Kentucky Power has considered rate case expenses in this proceeding to date.

28. State whether Stites and Harbison, PLLC provides Kentucky Power with detailed invoices for services rendered or only time and fee summaries. If detailed invoices are provided to Kentucky Power, provide the most recent invoice for services rendered in relation to this proceeding to date.

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DATED SEP 15 2020

cc: Parties of Record

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