

**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) 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 )

Case No.  
2017-00179

**Supplemental Requests for Information to  
Kentucky Power Co. from  
Kentucky League of Cities**

Respectfully submitted,

/s/Gregory T. Dutton

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## **INSTRUCTIONS**

- (1) Please identify the witness (es) who will be prepared to answer questions concerning each request.
- (2) Please repeat the question to which each response is intended to refer. An electronic version of these data requests can be provided, upon request.
- (3) These requests shall be deemed continuing so as to require further and supplemental responses if the company receives or generates additional information within the scope of these requests between the time of the response and the time of any hearing conducted hereon. Those supplemental responses shall be provided as soon as the Company becomes aware of or in possession of the new or additional information.
- (4) Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association, be accompanied by a signed certification of the preparer or 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.
- (5) To the extent that the specific document, workpaper or information as requested does not exist, but a similar document, workpaper or information does exist, provide the similar document, workpaper, or information.
- (6) As used herein, the words "document" or "documents" are to be construed broadly and shall mean the original of the same (and all non-identical copies or drafts thereof) and if the original is not available, the best copy available.
- (7) For any document withheld on the basis of privilege, state the following: date; author; addressee; indicated or blind copies; all persons to whom distributed, shown, or explained; and, the nature and legal basis for the privilege asserted.
- (8) In the event any document called for has been destroyed or transferred beyond the control of the company, please state: the identity of the person by whom it was destroyed or transferred, and the person authorizing the destruction or transfer; the time, place, and method of destruction or transfer; and, the reason(s) for its destruction or transfer. If destroyed or disposed of by operation of a retention policy, state the retention policy.
- (9) Please provide all spreadsheets used in responses to these requests for information in excel format with all cells unlocked and functional.

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1. Is any portion of the requested rate increase related to the recovery of costs recovered in any of the following Riders:
  - a. Big Sandy Retirement?
  - b. Environmental Surcharge?
  - c. Purchase Power Adjustment?
  - d. DSM Adjustment?
  - e. Fuel Adjustment?
  - f. System Sales Clause?
  - g. Capacity Charge?
2. If the response to #1 is yes, please state the amount of the requested rate increase associated with each of the Riders listed in #1.
3. Provide a schedule quantifying the portion of base rate charges (in \$ per kW, ¢ per kWh, or per customer per month) associated with the operation of each of the Riders listed in #1 by rate schedule.
4. Reference Kentucky Power Co. (hereinafter “KPC”) response to KLC 1-1. Explain why poles should be directly assigned to street lighting class, as opposed to allocating these costs between street lighting and pole attachments? In the alternative, confirm that KPC has no basis for failing to allocate these costs to pole attachments.
5. Reference KPC response to KLC 1-6.
  - a. Provide the amount of times the base fuel component was updated in 2015, 2016, and 2017.
  - b. Explain the time required to manually update this information.
  - c. Explain whether this any other basis for this change other than complications with the billing software.
6. Reference KPC response to KLC 1-9. Explain the KPC rationale for disallowing any new additions to the municipal waterworks tariff. Would KPC work with KLC to renew the municipal waterworks tariff and allow municipalities to take new service under this tariff?
7. Reference KPC response to KLC 1-23. For each city with an average of 8 days or greater, explain the cause for the delay in street light repair time.
8. Reference KPC response to KLC 1-27.
  - a. Provide a key explaining the shorthand used in Attachment 27. (For example, the letters and numbers under “ACCT CLAS CD,” “ACCT STAT CD,” “REVN CLAS CD” and “ACCT TYPE CD”)

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- b. Provide other applicable tariffs for the accounts listed in response to KLC 1-27 based on current and previous usage. (For example, those accounts under municipal waterworks may be applicable under other tariffs.) Also provide the individual annual sums for 2015, 2016 and 2017 if paid under the alternative tariffs.
9. Reference KPC response to KLC 1-34. Provide the data or excel sheet used to calculate these figures.
10. Reference KPC response to KLC 1-38.
  - a. Explain why not all municipalities within KPC service territory are listed in response to 38(a).
  - b. Provide the revenue from KLC 1-38(c) as both percentage and total collected in the list of cities provided in response to 38(a). (For example, the dollar total and percentage of annual CATV revenue collected in Pikeville in each year 2015 and 2016).