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July 7, 2016

Mark R. Overstreet (502) 209-1219 (502) 223-4387 FAX moverstreet@stites.com

#### HAND DELIVERED

Aaron D. Greenwell Acting Executive Director Public Service Commission 211 Sower Boulevard P.O. Box 615 Frankfort, KY 40602-0615

RECEIVED

JUL 0 7 2016

PUBLIC SERVICE COMMISSION

RE: Case No. 2016-00176

Dear Mr. Greenwell:

Enclosed please find and accept for filing the original and ten copies of Kentucky Power Company's responses to the Commission's June 27, 2016 data requests.

Please do not hesitate to contact me if you have any questions.

Very truly yours,

Mark R. Overstreet

**MRO** 

cc:

Mr. Howard

Mr. and Mrs. Clemons

### VERIFICATION

The undersigned, John A. Rogness III, being duly sworn, deposes and says he is the Director Regulatory Services 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/her information, knowledge and belief.

John A. Rogness III

COMMONWEALTH OF KENTUCKY )
Case No. 2016-00176
COUNTY OF FRANKLIN )

Notary Public

My Commission Expires: Mulary 13 2017

KPSC Case No. 2016-00176 Commission's First Set of Data Requests Dated June 27, 2016 Item No. 1 Page 1 of 1

# **Kentucky Power Company**

### REQUEST

Provide a copy of the certified topographic quadrant map that (1) covers the property at 263 Meeting House Road, West Liberty, Morgan County, Kentucky, (2) includes the proposed service territorial boundary changes and GPS coordinates that define the new territorial boundary, and (3) is signed by representatives of the Petitioners.

### **RESPONSE**

Kentucky Power and Licking Valley are not seeking authorization for a "proposed service territorial boundary change" The letter agreement provides "Licking Valley and Kentucky Power further agree that nothing in this agreement shall be deemed a change in the boundary line between the certified territories of Licking Valley and Kentucky Power." Instead, as provided for by KRS 278.018(6), Kentucky Power and Licking Valley are seeking approval of their letter agreement "allocating ... consumers between such retail electric suppliers."

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# **Kentucky Power Company**

## **REQUEST**

Provide the average cost to replace the conductor that serves the two accounts (a residence and garage) located at 263 Meeting House Road.

## RESPONSE

Kentucky Power is informed by Licking Valley that replacement of the neutral would cost approximately \$7,274.

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## **Kentucky Power Company**

## **REQUEST**

Provide the number of times the conductor that serves 263 Meeting House Road has been stolen or tampered with, and thus disrupted service to that address in the past five years.

### **RESPONSE**

According to Licking Valley Rural Electric, there have been two or three instances of tampering with, or theft of, the neutral during the past five years. On at least one occasion the neutral was stolen almost in its entirety. Moreover, the neutral was recently stolen and is in the process of being replaced as of the date of these responses.

KPSC Case No. 2016-00176 Commission's First Set of Data Requests Dated June 27, 2016 Item No. 4 Page 1 of 1

# **Kentucky Power Company**

## REQUEST

Refer to the third page of the agreement between Kentucky Power and Licking Valley regarding the proposed service boundary change. Provide the date that Mr. Howard signed the agreement.

### RESPONSE

The agreement was signed by Mr. Howard on May 19, 2016. Please see the following attachment for an updated dated signature page.

KPCO Case No. 2016-00176 Commission Staff's First Data Request Order Dated June 27, 2016 Item No. 4 Attachment 1 Page 1 of 1

Agreed to this 19th day of May, 2016.

Licking Valley Rural Electric Cooperative Corporation

Its: <u>General Manager/CEO</u>

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## **Kentucky Power Company**

### **REQUEST**

Explain in detail how the provision of service by Kentucky Power will reduce or eliminate the conductor being stolen or tampered with.

#### **RESPONSE**

The current 2,800 foot service to the Clemons' residence and garage crosses isolated terrain that is out of the view of the public for much of its length. The proposed 600 foot extension from Kentucky Power's existing service facilities would be in the view of the public for most or all of its length. This increased visibility is expected to limit the opportunity for theft of the neutral and reduce the likelihood of the accidental injury to, or the death of, persons who otherwise might steal or tamper with the conductor.