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

<u>COMMISSION STAFF'S FOURTH REQUEST FOR INFORMATION TO KENTUCKY POWER COMPANY</u>

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 August 26, 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.

[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 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, Kentucky Power 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. Provide a copy of all schedules requested herein in Excel spreadsheet format with all formulas intact and unprotected and with all columns and rows accessible.

2. Kentucky Power's Response to Staff's Second Request for Information (Staff's Second Request), Item 1.b, was non-responsive. Provide a descriptive list (including the amount of quantifiable, realized, and projected savings) of all activities, initiatives, and programs conducted for the purpose of minimizing costs or improving operational and maintenance efficiencies.

3. Refer to the application, Exhibit E, page 8 of 216. Indicate whether Kentucky Power requires an additional or subsequent deposit from residential customers with a satisfactory payment history if the customer has a change in usage.

4. Refer to the application, Exhibit E, page 9 of 216. Explain how Kentucky Power will determine whether to offer the Equal Payment Plan to nonresidential customers requesting to be placed on that plan.

5. Refer to the application, Exhibit E, page 11 of 216. Explain how Kentucky Power currently recovers costs when a city or town requests underground service and when Kentucky Power is required to install underground facilities or relocate existing overhead facilities underground pursuant to a municipal or other governmental requirement or directive.

6. Refer to the application, Exhibit E, page 11 of 216. If the proposed tariff is approved, explain how the costs will be recovered from the residents of the city or town, the period over which the costs will be recovered, and how the residents of the city or town will be notified of the increased cost.

7. Refer to the application, Exhibit E, page 11 of 216. Provide a copy of Kentucky Power's underground service plan, indicating when it was last filed with the

Commission, and a copy of Kentucky Power's most recent annual filing made pursuant to 807 KAR 5:041, Section 21(5)(b).

8. Refer to the application, Exhibit E, page 64 of 216, Tariff F.P., number 12, which discusses the policy of customers requesting termination of service off-cycle during the billing period.

a. Explain why a customer requesting termination of service off-cycle should be responsible for fixed charges past their termination date.

b. Explain whether Kentucky Power has the same policy for its post-pay customers.

9. Refer to the application, Exhibit E, page 79 of 216, Tariff C.S.-I.R.P. Confirm that the first change under Conditions of Service is simply updating the name of the PJM Program. If not confirmed, explain the reason for the change.

10. Refer to the application, Exhibit E, page 79 of 216, Tariff C.S.-I.R.P. Explain the reason for the deletion of the following sentence under Conditions of Service: "If insufficient MWs are available for PJM enrollment by Kentucky Power, the Company shall offer to substitute one of the other PJM Emergency Demand Response Programs that is available."

11. Refer to the application, Exhibit E, page 79 of 216, Tariff C.S.-I.R.P. Explain the reason for the addition of the three new paragraphs under Conditions of Service.

12. Refer to the application, Exhibit E, page 82 of 216, Tariff C.S.-I.R.P. Explain the deletion of the sentence under Special Terms and Conditions.

13. Refer to the application, Exhibit E, page 90 of 216, Outdoor Lighting, and page 95 of 216, Street Lighting. Provide supporting documentation for the monthly maintenance charge amounts for the flexible lighting options.

14. Refer to the application, Exhibit E, page 109 of 216, Tariff System Sales Clause (SSC). Explain why the amount of the Annual System Sales Adjustment Factor is not listed in the tariff.

15. Refer to the application, Exhibit E, page 109 of 216, Tariff SSC.

a. Explain Kentucky Power's considerations when determining when to self-schedule generating resources as opposed to waiting to operate pursuant to PJM's direction.

b. Explain how Kentucky Power's self-scheduling impacts Tariff SSC.

c. Given that Kentucky Power participates in PJM, explain how Kentucky Power makes off-system sales.

d. Explain in specific detail Kentucky Power's participation in off-system sales, including Kentucky Power's considerations in determining when to make off-system sales.

16. Refer to the application, Exhibit E, page 138 of 216, Non-Utility Generator Tariff. Provide the reason for the deletion of the Monthly Billing Demand and Monthly Billing Energy sections.

17. Refer to the application, Exhibit E, page 214 of 216, Decommissioning Rider. Explain why the amounts of the Decommissioning Rider Adjustment Factors are not listed in the tariff.

18. Refer to the application, Exhibit E, page 214 of 216, Decommissioning Rider. Also refer to Case No. 2017-00179,[2] Big Sandy Decommissioning Rider 2019 Annual Update, Tab "Calculation."

a. Explain in detail the expense items included in the Additions column for December 2018 through June 2019.

b. Provide a copy of the Big Sandy Decommissioning Rider 2020 Update in addition to filing a copy in the post-case correspondence file of Case No. 2017-00179.

19. Refer to the application, Section IV, Page 3 of 20. Additionally, refer to the Excel provided in Kentucky Power's response to Commission Staff's Second Request for Information, KPCO_R_KPC_2_16_Attachment1.xlsx, Tab Sch 4.

a. The amounts recorded in Section IV, column (6), entitled "Adjusted as of March 31, 2020 (Schedule 4)" do not appear to correspond to the amounts recorded in column (6) of the spreadsheet in the tab labeled Sch 4. Reconcile the differences in the amounts between these two schedules.

b. The amount of accumulated deferred income taxes listed in Section IV, column (3), "Per Books as of March 31, 2020" does not correspond to column (2), "KPCo Total Company Per Books" of the spreadsheet in the tab labeled Sch 4, line 237, "Accumulated Deferred Income Taxes." Reconcile these amounts.

[2] 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*, Big Sandy Decommissioning Rider 2019 Annual Update (filed Aug. 15, 2019).

20. Refer to the Direct Testimony of Scott E. Bishop (Bishop Testimony), page 6, line 9, through page 7, line 19, which explains Kentucky Power's revision to the Fuel Adjustment Clause Tariff.

a. Explain whether there have been PJM Customer Payment Defaults other than GreenHat Energy, LLC, and if so, provide for each of the last ten years the name of the defaulting party, the amount of the default, and the amount allocated to Kentucky Power.

b. Of any amounts of previous defaults allocated to Kentucky Power in the last ten years, explain which billing line items were used to pass along the defaulted amounts in each year and the respective amount in each billing line item.

c. Of any amounts of previous defaults allocated to Kentucky Power in the last ten years, explain how Kentucky Power passed along the incremental default amounts to its customers.

21. Refer to the Bishop Testimony, page 6, lines 11–14.

a. Explain why Kentucky Power is proposing to include PJM Customer Payment Defaults through the inclusion of billing line item 1999.

b. Explain whether there are any risks associated with Kentucky Power's participation in PJM.

c. Explain whether shareholders receive any benefits from Kentucky Power's participation in PJM.

d. Explain why losses arising from the risk of participating in PJM is not shared between shareholders and Kentucky Power's customers.

22. Refer to the Bishop Testimony, page 8, line 17, through page 9, line 2. Explain whether any participating or prospective customers have approached Kentucky Power with concerns about not being able to choose the timing of the contractual discounts under the Economic Development Rider (Tariff E.D.R.).

23. Refer to the Direct Testimony of Jaclyn N. Cost (Cost Testimony), page 12, line 12. Ms. Cost states that there is no difference in the presentation of Kentucky Power's jurisdictional cost of service study (COSS). Further, on page 8, line 11, Ms. Cost states that there were no changes in the energy and demand allocation factors. Explain whether this implies there were no changes in the process of determining the factors or whether it implies that there was no change in the percent allocated to each rate class.

24. Refer to the Direct Testimony of Kimberly Kaiser (Kaiser Testimony), page 5, regarding the overview and descriptions of AEP's short-term incentive compensation (STI) long-term incentive compensation programs (LTI). Provide percentages associated earnings per share, safety and compliance measures, and strategic initiatives tied to the funding of AEP's STI. If these percentages vary by business unit within AEP, provide a breakdown of percentages by business unit.

25. If the earnings per share (EPS) goal is not met, confirm that only the portion of the STI attributed to the EPS goal will not be funded, and identify the adjustment to test-year expenses and to payroll tax expense to remove the portions of the STI Plans from test-year expenses that would not be paid out if the EPS goal was not met.

26. Provide the number of times the EPS goal was met in the past five years.

27. Refer to the Kaiser Testimony, page 11.

a. Explain whether Kentucky Power has performed any specific studies or analyses to quantify the effect incentive compensation has on attraction and retention of employees.

b. Explain whether Kentucky Power has performed any specific studies or analyses to quantify the direct benefits of incentive compensation to its customers.

28. Refer for the Direct Testimony of D. Brett Mattison (Mattison Testimony), page 11, lines 14–19. State whether Kentucky Power is capable of offering the Flex Pay Program with its current Automatic Meter Reading (AMR) infrastructure. If not, indicate whether there are modifications that could be made to the AMR infrastructure that would allow Kentucky Power to offer the Flex Pay Program.

29. Refer to the Mattison Testimony, page 13, line 22. Mr. Mattison states that customer usage has declined by more than 576 million kilowatt-hours at a cost of $19.5 million in net revenue.

a. Provide a breakout of the percentage of declining customer usage that can be attributed to each of the residential, commercial, and industrial customer classes.

b. Provide the supporting calculation for $19.5 million.

30. Refer to the Mattison Testimony, page 14, lines 4–9. Explain how Kentucky Power obtains equity capital. If all equity capital is obtained from the AEP parent corporation, include in the explanation a discussion of how and when AEP decides to issue additional common equity and the basis upon which that additional equity is allocated to (invested in) each of the jurisdictional operating companies.

31. Refer to the Mattison Testimony, page 14, lines 14–16. Kentucky Power proposes a return on equity (ROE) of 10.0 percent, yet studies have shown that the average S&P market return is also 10.0 percent.[3] Explain why an ROE of 10.0 for a risk adverse investment is justified when the average return for the stock market, a more risky investment, is also 10.0 percent.

32. Refer to the Direct Testimony of Adrien M. McKenzie (McKenzie Testimony), pages 4, line 23, through page 5, line 1, and page 47, lines 6–17.

a. Provide a list of all current authorized ROE for each of the AEP operating companies, the effective date of the ROE, and whether the ROE was the result of a settlement or fully litigated rate case.

b. Explain the extent to which state regulatory commission authorized ROEs influence how AEP allocates capital for comparable capital projects across the various jurisdictional operating companies.

c. For 2019, provide the amount of budgeted capital earmarked for transmission and distribution related expenses at the AEP corporate level and how that capital was ultimately distributed to each AEP jurisdictional operating company. Include in the response, separate amounts for transmission and distribution capital projects to each operating company.

33. Refer to the McKenzie Testimony, page 14, lines 3–11.

a. For the utilities included in the proxy group, explain whether any has had a credit downgrade as a result of the risk of carbon transition risk.

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[3] https://www.cnbc.com/2019/12/31/the-stock-market-boomed-in-2019-heres-how-it-happened.html#:~:text=The%20S%26P%20500%20ended%202018,over%2090%20years%20of%209.8%25.

b. Explain whether any of the utilities listed in the proxy group assign a high, moderate, or low probability of carbon regulation in their long range resource plans.

34. Refer to the McKenzie Testimony, page 19, lines 8–14. Explain whether this Commission has denied recovery of federally mandated environmental compliance expenditures and, if not, explain whether the recovery of such expenditures reduces the risks associated with heightened capital expenditure programs.

35. Refer to the McKenzie Testimony, page 22, lines 8-21. Many of the utilities in the proxy group are holding companies with non-jurisdictional and foreign operations. Explain the extent to which COVID-19 risk exposure is affecting the proxy group utilities through these other operations.

36. Refer to the McKenzie Testimony, Figure AMM-4, page 27. Provide the underlying monthly data in Excel spreadsheet format with cells and formulas visible and unprotected. Include an update to the data in the Figure showing the yield spread between each of the AEP jurisdictional operating companies and each company in the proxy group, and 30-year treasuries beginning May 2019 through the most current date available.

37. Refer to the McKenzie Testimony, page 32, lines 4–16, and Table AMM-2, page 33.

a. Explain the reason beta values are calculated on five years of data versus one year of data.

b. Provide an update to Table AMM-2 by including two additional columns with beta values calculated using the traditional five-year historical period, with one column for five years ending March 31, 2020, and one column for five years ending December 31, 2019.

c. Explain whether it would be appropriate to use the beta values in Table AMM-2 in CAPM models.

38. Refer to the McKenzie Testimony, page 35, lines 4–10. The first statement appears to contain a non sequitur. If investors' future expectations are reflected in current capital market data, then explain how that data would not already contain and account for any evidence regarding expected changes in long-term capital costs.

39. Refer to the McKenzie Testimony, Table AMM-4, page 41. For each company listed in the table, provide the percent of total operations obtained from regulated U.S. operations, the percent of total operations obtained from non-regulated U.S. operations, and the percent of total operations obtained from non-regulated foreign operations.

40. Refer to the McKenzie Testimony, and Table AMM-5, pages 57–59 and Exhibit AMM-4, page 4.

a. Explain whether FERC is applying its 100 basis point adjustment methodology utilized the exact method in Exhibit AMM-4 page 4. If not, explain the differences between FERC methodology and that in Exhibit AMM-4 page 4.

b. Explain why it is reasonable to accept that an average of six months of bond yields in 2007 plus six months of bond yields from 2008 is appropriate for use as a current bond yield and as a projected bond yield.

41. Refer to the McKenzie Testimony, Exhibit AMM-4. Explain why it is reasonable to assign equal weights to the Value Line, IBES, and Zacks estimates given

that IBES and Zacks growth estimates are based upon a compilation of multiple analysts' estimates, but Value Line's estimates are based upon a single analyst.

42. Refer to the McKenzie Testimony, pages 62, lines 1–10, and Exhibit AMM-6. If not provided previously, provide in Excel spreadsheet format with all cells unprotected and formulas intact the worksheets supporting the calculation of the average growth rate of 9.3 percent and the average year ahead dividend yield of 3.1 percent.

43. Refer to the McKenzie Testimony, page 63, lines 6–15.

a. Provide a detailed explanation and supporting documentation why the beta measure needs to be adjusted to account for company size in order to capture investors' required rates of return.

b. Explain whether any of the firms that compute company betas have incorporated adjustments to correct for this "deficiency." If they have, provide the documentation that supports the new beta calculations.

c. Provide a list of state regulatory commissions that regulate an AEP operating company that accepted the size adjustment as proposed in the CAPM analysis, and a list of state regulatory commissions that rejected this adjustment to the CAPM analysis.

44. Refer to the McKenzie Testimony, Exhibits AMM-6 and AMM-7. Explain the rule that governs the size adjustment addition or subtraction. The adjustment does not appear to be consistent when compared to firm market capitalization. For example, NextEra Energy Inc. and Xcel Energy Inc. both have a negative 0.28 percent adjustment to the CAPM and ECAPM analyses.

45. Refer to the McKenzie Testimony, page 64, lines 7–14. Provide an explanation and demonstrate how the forecasted long term Treasury bond yields were developed from data obtained from Value Line, HIS Global Insight and Blue Chip.

46. Refer to the McKenzie Testimony, page 69, lines 22–25, and Exhibit AMM-8.

a. Explain whether any adjustments were made to the authorized ROEs to account for regulatory climate, whether the ROE was the result of a fully litigated full rate case, and any adders, penalties, or other types of incentives that other state commissions may have attached to utility ROEs. Also explain what adjustments were made in which years and to which state authorized ROEs.

b. Explain in detail how a ROE awarded to a utility operating in another state with a different regulatory climate and under different circumstances than that experienced by Kentucky Power has any bearing on an estimated ROE for Kentucky Power.

c. Explain whether the Average Utility Interest Rates on page 4 of the exhibit are the Average Utility Bond Yields found on page 3.

47. Refer to the McKenzie Testimony, Exhibit AMM-8, pages 1–2.

a. For page 1, show the calculation in footnote (b) and explain why it is reasonable to average the yield on all utility bonds and a specific subset for a current average bond yield of 3.43 percent.

b. For page 2, show the calculation in footnote (b) and explain why it is reasonable to average the yield on all utility bonds and a specific subset for a current average bond yield of 4.45 percent.

c. For pages 1 and 2, explain why different utility bond subsets (Baa and A) were used in the calculations described in footnote (b).

48. Refer to the McKenzie Testimony, Exhibit AMM-8, page 3.

a. Confirm that over the 45-year study period, the data in the Allowed ROE column is based upon state jurisdictional electric utilities only. If not, explain whether there are natural gas, gas pipeline, water, sewer, telecommunication companies or other that comprise the data set.

b. Currently, Kentucky Power issues its own debt but does not issue its own equity. AEP issues stock and is the sole equity investor in Kentucky Power. Confirm that this has been the case over the 45-year study period. If not, explain how this arrangement has changed over the years.

c. Over the 45-year study period, on an annual basis, explain how many of the state jurisdiction electric utilities with awarded ROEs are standalone companies and those that are a part of a larger holding company.

d. Confirm that when a holding company issues stock, all of the holding companies operating companies are included in a rating agency's analysis of a company's overall current and future financial strength and that the return on that stock depends on the current and anticipated financial performance of the holding company as a whole.

e. Over the 45-year study period, explain whether the data in the Average Utility Bond Yield column is tied to individual state jurisdictional electric utility issuances only. If not, explain whether there are natural gas, gas pipeline, water, sewer, telecommunication companies or other that comprise the data set.

f. Over the 45-year study period, explain whether the debt-issuing entity is part of a holding company that issues debt or securities and allocates the capital to state jurisdictional utility operating companies through a money pool or other type arrangement.

g. Over the 45-year study period, explain whether the return of a state jurisdictional utility that issues debt is tied to the financial strength of a parent holding company, or to quality measures such as investment grade and Value Lines' financial strength and safety ratings. If quality measures influence the return, explain whether all the bond yields are issued by companies of similar quality.

49. Refer to the McKenzie Testimony, page 76, lines 6–20, and page 77, lines 1–12.

a. Explain whether and how flotation costs are recovered such that investors who invest in non-regulated competitive industries have the opportunity to earn their required ROE.

b. Explain the extent to which investors' required ROEs for holding company stock are influenced by the non-regulated operations of holding companies which include regulated utilities, such as Kentucky Power.

50. Provide a copy of the following documents cited in the McKenzie Testimony:

a. The Moody's Investor Service credit opinion cited on page 8, footnote 7.

b. The document cited on page 14, footnote 13.

c. The document cited on page 19, footnote 17.

51. Refer to the Direct Testimony of Franz D. Messner, (Messner Testimony), page 6, lines 1–3. Regarding the accounts receivable:

a. Explain why Kentucky Power sells its receivables to AEP.

b. Explain whether Kentucky Power's uncollectible accounts remain with Kentucky Power.

c. Provide the cost of the accounts receivable financing charged to Kentucky Power by AEP.

52. Refer to the Messner Testimony, page 6, lines 9–11. Also refer to Kentucky Power's Application for Case No. 2019–00072.[4] Kentucky Power requested the flexibility to issue and sell, in one or more transactions through December 31, 2020, up to $275 million for general corporate purpose the refinancing of the WVEDA, Series 2014A Pollution Control Bond due 2020 (Series 2014A Bonds). Kentucky Power requested the flexibility through December 31, 2020, stating that such a period would allow Kentucky Power the ability to assess market conditions and determine the most advantageous terms. Explain why Kentucky Power choose to refinance the Series 2014A Bonds on June 19, 2020, at a rate higher interest rate.

53. Refer to the Direct Testimony of Debra L. Osborne (Osborne Testimony), Section IV, which refers to the status of the decommissioning of Big Sandy Unit 2. Provide an update to the decommissioning and demolition activities at Big Sandy Unit 2 that remain to be completed, and the expected completion date of each activity.

[4] Case No. 2019-00072, *Electronic Application of Kentucky Power Company for Authority Pursuant to KRS 278.300 to Issue and Sell Promissory Notes of One or More Series and for Other Authorizations*, Application (filed Mar. 6, 2019).

54. Refer to the Osborne Testimony, page 6, lines 1–3. Provide an update to the Big Sandy Plan Coal Ash Impoundment completion.

55. Refer to the Osborne Testimony, page 8, Table 2. Provide the information included in Table 2 for the three calendar years preceding the test year.

56. Refer to the Direct Testimony of Everett G. Phillips (Phillips Testimony), page 7, line 1. Provide the annual breakdown of the individuation costs that comprise the increase in O&M from $4.839 million to $11.032 million for widening of the rights-of-way and danger tree removal.

57. Refer to the Phillips Testimony, page 7, line 19, through page 10, line 21. Explain whether Kentucky Power utilizes drones in the inspection of distribution assets, and if so, describe how the drones are used and what regulations, state or federal, impact how Kentucky Power uses drones to inspect its infrastructure.

58. Refer to the Phillips Testimony, pages 8–10.

a. Provide the annual amount spent for each of the nine Distribution Asset Management Programs since 2017.

b. For the Overhead Circuit Facilities Program, provide the annual number of problems found during inspections since 2017.

c. For the Animal Mitigation Program, provide the annual number of animal-caused outages since 2017.

d. For the Lightening Mitigation Program provide the annual number of lightning-caused outages.

e. For the Sectionalizing program provide the annual number of cutouts that were replaced or added since 2017.

59. Refer to Phillips Testimony, page 11, lines 3–8, which discuss the expansion, upgrade, or replacement of Kentucky Power's distribution system to serve new customers. Given the testimony regarding Kentucky Power's declining customer base, explain in greater detail what plans Kentucky Power has to expand, upgrade, or replace its distribution system to serve new customers.

60. Refer to the Phillips Testimony, page 12, lines 7–23, and page 13, lines 1–16. For each of the seven capital project categories, provide the annual investment since 2017.

61. Refer to Phillips Testimony, page 14, line 8, through page 15, line 3. Explain in greater detail the reason for the almost $6 million decrease in forestry expense from 2017 spend to Test Year spend on forestry.

62. Refer to Phillips Testimony, page 17, lines 4–12. Explain the difference between foliar spraying and cut stubble application of herbicide and the impact of each method on the period for regrowth of vegetation.

63. Refer to the Phillips Testimony, page 21, lines 14–16. Provide an annual breakdown of the $28.2 million spent on capital projects related to vegetation management since 2017.

64. Refer to the Phillips Testimony, page 33, lines 17–23. Confirm that the distribution line project Kentucky Power is examining is not included in the proposed revenue requirement.

65. Refer to the Direct Testimony of Lerah M. Scott, page 9, lines 15–20. Provide supporting documentation for the $511,720 increase in jurisdictional storm damage expenses.

66. Refer to the Direct Testimony of Jason M. Stegall, page 15, lines 17–18.

a. Explain why Account 904, Uncollectibles, is allocated based upon customer count and not actuals.

b. Provide the actual historical test-year class uncollectibles by class.

67. Refer to the Direct Testimony of Alex E. Vaughan (Vaughan Testimony), page 8, the Kentucky Power Functional Cost of Service diagram (2020 COS Diagram). Also, refer to Case No. 2017-00179, the Direct Testimony of Alex E. Vaughan, page 8, the Kentucky Power Functional Cost of Service Diagram (2017 COS Diagram).

a. Explain what has contributed to the decline in cost of generation from 65 percent in the 2017 COS Diagram to 59 percent in the 2020 COS Diagram.

b. Explain what has contributed to the increase in the cost of transmission from 12 percent in the 2017 COS Diagram to 17 percent in the 2020 COS Diagram.

68. Refer to the Vaughan Testimony, page 9, line 9.

a. Confirm that the interclass subsidy the residential class was receiving was $30.7 million in Case No. 2017-00179.

b. Explain the reason for the increase in the interclass subsidy.

69. Refer to the Vaughan Testimony, page 12, lines 11–23, and page 13, lines 1–8.

a. Explain how a winter heating block reduces the intra-class subsidy.

b. Provide a bill comparison at various levels of usage with and without the inclusion of the proposed winter declining block rate.

c. Provide the energy rate without a winter declining block rate.

d. Explain whether variable costs increase or decrease as energy demand increases in the winter.

e. Explain whether the LMP increases in the winter.

f. Provide the monthly average usage and number of customers by Census Track for the last five years.[5]

70. Refer to the Vaughan Testimony, page 14, lines 16–22.

a. 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 in Exhibit AEV–2.

b. Provide support for the Fixed Distribution Plant Allocation Factors.

71. Refer to the Vaughan Testimony page 17, line 23 and page 18, line 1. Provide a comparative list of the number of customers per mile line between Kentucky Power and its peers.

72. Refer to the Vaughan Testimony, page 18, line 18, through page 19, line 15, which discusses the proposed Electric Vehicle Charging Provisions.

a. Explain why the Electric Vehicle Charging Provisions are not set forth in a separate rate schedule.

b. Explain whether customers can currently charge their electric vehicles under Kentucky Power's current rate schedules.

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[5] *See* https://geocoding.geo.census.gov/geocoder/geographies/address?form

c. Explain whether Kentucky Power is proposing to require that all electric vehicle charging load be on a separate time-of-day meter or whether it is just offering customers another option for their electric vehicle charging load.

d. Provide support that the cost of the separate second meter is being offset by the additional fixed cost contribution from the on-peak and off-peak energy charges.

73. Refer to the Vaughan Testimony, page 18, lines 20–22. Explain whether any additional equipment, other than a separately wired time-of-use meter, will be required to be installed.

74. Refer to the Vaughan Testimony, page 19, lines 2–4. Explain the reason for choosing fees based on the load management time-of-day and standard time-of-day provisions already in the residential tariff.

75. Refer to the Vaughan Testimony, page 19, lines 2–4. Explain whether other rate for electric vehicle charging were considered. If so, explain what rates were considered and why they were not chosen. If not, explain why other rates were not considered.

76. Refer to the Vaughan Testimony, page 19, lines 13–25. Explain whether non-residential customers would be charged an extra basic service charge. If so, explain why they would be treated differently from residential customers. If not, explain why not.

77. Refer to the Vaughan Testimony, page 21, lines 7–8. Explain how Kentucky Power arrived at 84 months as the amount of time the conversion charge would be collected.

78. Refer to the Vaughan Testimony, page 21, lines 19–21. State whether customers would have the option of paying any part of the installed cost of the system up-front in order to lower the monthly lamp charge. If not, explain why not.

79. Refer to the Vaughan Testimony, page 21, lines 21–22. Explain why the monthly maintenance charges for the flexible lighting options are not based on an average of Kentucky Power's monthly maintenance charges for LED lights if Kentucky Power is proposing to cease new installations of non-LED lamps as of January 1, 2021.

80. Refer to the Vaughan Testimony, page 22, lines 19–21. Provide support of the difference between on-peak and off-peak PJM locational marginal prices for the last three years.

81. Refer to the Vaughan Testimony, pages 23–29, or the Net Metering Service Tariff Changes Section.

a. Explain why Kentucky Power chose this method for the calculation of the avoided cost rate of energy in net metering.

b. Explain whether other AEP subsidiaries calculate the avoided cost of energy for net metering in the same manner.

c. Provide any studies supporting the proposed method of calculating the avoided cost of energy for net metering.

d. Explain why Kentucky Power is proposing to recover the cost of its payments for excess generation through the PPA tariff.

e. Provide the amount Kentucky Power has spent to date researching and developing the proposed net metering tariff.

82. Refer to the Vaughan Testimony, page 25, lines 6–11 and Exhibit AEV-3.

a. Provide the test-year average usage, the amount of billing energy and the number of kWh of excess generation produced in a billing period for the current 44 net metering customers.

b. Provide Exhibit AEV-3 in Excel spreadsheet format with all cells and formulas visible and unprotected. Explain how Kentucky Power derived the distribution of typical kWhs per month by each hour of the day, which sum to 1,240 kWh per month.

c. In Exhibit AEV-3, page 1 of 2, explain the rationale for using 5CP summer and 12 CP allocators.

d. In Exhibit AEV-3, page 1 of 2, explain how the Summer Peak 5CP weights were derived.

e. In Exhibit AEV-3, page 1 of 2, explain why there are only four observations in the Summer Peak 5CP Excess % column.

f. In Exhibit AEV-3, page 1 of 2, explain why there is a gap of three observations in the last three columns of the spreadsheet.

g. In Exhibit AEV-3, page 1 of 2, explain how the 12CP Hours weights were derived.

h. Regarding the full solar output shape value, explain whether the values can differ amongst solar plants. If the values can differ, explain why this particular solar plant example was chosen.

83. Refer to the Vaughan Testimony, page 33, lines 17–21, and page 34, lines 1–9.

a. Regarding the proposed changes to the Federal Tax Cut (FTC) Tariff, for the FTC credits in 2022 and beyond, provide the time the balance of the excess ADIT will be returned.

b. During Case No. 2018-00035,[6] Kentucky Power was concerned about the flow back of the excess unprotected ADIT so to protect credit metrics and pushed for a longer amortization period than the 18 years agreed to in the resulting settlement. Given the concern over the amortization period, explain why Kentucky Power is increasing the front-end refund of the excess ADIT balance

84. Refer to the Vaughan Testimony, Exhibit AEV–1, page 2 of 65. Explain the fixed-cost adder of $0.0500/kWh.

85. Refer to the Vaughan Testimony, Exhibit AEV-5 and to Case No. 2017-00179, Post Case Files, Revised KPCO 2019 Annual Update.xlsx, Tab PPA Form 5.0.

a. Provide a complete description of each of the costs and expenses used in the calculation of the "Total PPA Base Amount", lines (1) through (13a).

b. Explain whether costs captured in Accounts 5650021 and 5650015 were previously broken out from one or more of the other accounts listed in AEV-5 and the Revised KPCO 2019 Annual Update.

c. Also, refer to KPCO_R_AG_PHDR_3_Attachment1.xlsx in Case No 2017-00179, filed December 20, 2017. In Kentucky Power's response to the Attorney General for the 12 months ending February 2017, the accounts total $70,212,659. The PJM Load Service Entity (LSE) Open Access Transmission Tariff (OATT) Base Amount

[6] Case No. 2018-00035, *Kentucky Industrial Utility Customers, Inc. V. Kentucky Power Company* (Ky. PSC June 28, 2018).

in AEV-5 and the Revised KPCO 2019 Annual Update totals $74,038,517. For each account, reconcile the differences between two account totals, and explain why the OATT base amount in the PPA is $3,825,858 greater than what was reported as actual OATT LSE charges that Kentucky Power paid to PJM for affiliate and non-affiliate transmission services.

86. Refer to the Vaughan Testimony, page 26, lines 15–19. Explain why it is appropriate to base the avoided energy price amounts upon the PJM Locational Marginal Price forward pricing for the Kentucky Power load aggregate instead of basing it upon a competitive solicitation process.

87. Refer to the Vaughan Testimony, page 30, line 16, which states that the Non-Utility Generator (NUG) Tariff will be closed to new customers effective January 1, 2021. Explain the reason for proposing this change.

88. Refer to the Vaughan Testimony, page 30, lines 17–18, which states that the commissioning and startup power provisions of the NUG Tariff will be eliminated. Other than the fact that the current customer taking service under the NUG Tariff is not using these provisions, explain the reason for proposing this change.

89. Refer to the Vaughan Testimony, page 31, lines 1–11 and Exhibit AEV-5, lines 12-13.

a. Provide the supporting calculations for the Forced Outage Purchase Power Limitation Base Amount, including the test-year forced outage purchased power expense and the portion recovered through the Fuel Adjustment Clause on a monthly basis.

b. Provide the supporting calculations for the CS IRP Base Amount on a monthly basis.

90. Refer to the Vaughan Testimony, page 32, lines 11–14. Explain why Kentucky Power is unable earn its allowed ROE without a full tracking mechanism in the PPA.

91. Refer to the Vaughan Testimony, pages 32, lines 17–20. Explain how PJM's allocation methodology changed as a result of the settlement in FERC docket EL05-121 and how the new PJM allocation methodology affected each of the AEP operating companies' allocated share of costs.

92. Refer to the Vaughan Testimony, page 32, lines 20–22, and page 33, lines 1–5. If the Commission does not grant Kentucky Power's proposed treatment of 100 percent of PJM LSE OATT charges and credits, provide the estimated annual calculations for the next two years.

93. Refer to the Vaughan Testimony, page 33, lines 6–14, and Exhibits AEV-5 and AEV-7, page 5 of 6.

a. Explain how the categories enumerated in Exhibit AEV-5 totaling $96,896,495 are captured by the three categories operating company (OPCO) ATRR, Transo ATRR, Schedule 12 Expense (RTEP) in Exhibit AEV-7, page 5 of 6.

b. After applying Kentucky Power's allocation methodology, explain the differences between the $95,808,898 (existing) and $95,811,024 (projected) allocated amounts in Exhibit AEV-7, page 5 of 6, and the $96,896,495 net PJM LSE OATT charges and credit included in base rates in Exhibit AEV-5.

c. Explain whether there are any other cost categories comprising the $96,896,495 in net PJM LSE OATT Base Amount that are in addition to the NITS and Schedule 12 Expenses listed in Exhibit AEV-7 page 5 of 6. If so, list these categories and the dollar amounts.

94. Refer to the Vaughan Testimony, Exhibit AEV-1, page 55 of 65.

a. Explain how Kentucky Power determined that $700 per kW is the Capital Cost per kW of Capacity and provide supporting documentation for that amount.

b. Explain how Kentucky Power determined that 2 percent is the Fixed Operation and Maintenance Cost Escalation Rate and provide supporting documentation for that amount.

95. Refer to the Vaughan Testimony, Exhibit AEV-7, page 5 of 6.

a. Explain the period upon which the Exhibit is based (i.e., 2019 calendar year, other calendar year, test year, etc.).

b. Explain whether PJM recalculates or updates the Non-Affiliate portion of the existing Network Service Peak Load (NSPL) allocation percentage annually, and if so, when.

c. Provide for the ten years ending in 2019, the date and system peak that forms the basis for PJM's 1CP allocation percentage of NSPL to AEP (including CRES) and non-affiliate.

d. Explain the meaning of CRES, ATRR, and PTRR.

e. Explain what entities are included in the NSPL.

f. Explain the differences between the 19,131 MW attributed to AEP (including CRES) and the 16,684 MW attributable to the Operating Company Sum.

g. Explain whether the 22,476 MW existing NSPL is the basis for the $1,989,594,977 Total Zonal ATRR.

h. Explain the different types of projects and expenses that are included in each of OPCO ATRR, Transco ATRR, and Schedule 12 Expenses (RTEP) categories.

i. Of the three categories, OPCO ATRR, Transco ATRR, and Schedule 12 Expenses (RTEP), identify the categories in which PJM and AEP include Kentucky Power's Supplemental projects. If Kentucky Power's Regional Transmission Expansion Plan (RTEP) projects are not included in the Schedule 12 Expense (RTEP) category, explain how they are categorized.

j. Explain whether there are any transmission related Kentucky Power projects that are reviewed and approved by PJM that are not included in one of the OPCO ATRR, Transco ATRR, and Schedule 12 Expenses (RTEP) expense categories. If so, identify the projects, and explain whether and how the related expenses are included in Kentucky Power's OATT.

k. For the Kentucky Power transmission related capital projects during the test year for which expenses were booked, explain whether the FERC approved 10.35 return or the Commission approved return is applied to booked capital expenditures. If there is a difference, provide an explanation of how the two different returns are applied and to which amounts for each project.

l. During the test year, explain how much of the total transmission related capital spending in Kentucky Power's service territory is on Kentucky Power's books and how much is on Kentucky Power Transmission's books.

m. Explain whether any of the capital spending resulting from transmission related projects for which Kentucky Power was granted a CPCN is recorded on Kentucky Power Transmission's books.

n. The KP-12CP allocation factor (5.66% rounded) does not appear to be the factor used to derive either the $95,808,898 or the $95,811,024 figures. Explain which allocation factor was used and how it was derived,

96. Refer to the Vaughan Testimony Exhibit AEV-7 page 5 of 6.

a. For the ten years ending in 2019, provide the annual NSPL MW total, AEP (including CRES) MW, and non-affiliate MW and the resulting percentages in Excel spreadsheet format with all formula and cells visible and unprotected.

b. Provide the annual system 1 Coincident Peak (1CP) and the 12 monthly Coincident Peak (12CP) amounts in MW over the ten years period ending in 2019 for each of AEP's operating companies. Include percentage calculations and total annual figures.

c. For the ten years ending in 2019, provide the annual Network Integration Transmission Service (NITS) expense broken out by operating company (OPCO) ATRR, Transo ATRR, Schedule 12 Expense (RTEP), and total Zonal ATRR.

d. For the ten years ending in 2019, provide annually the amounts allocated to AEP %, AEP$ from total Zonal ATRR, and the resulting amounts allocated to each of the OPCOs, and the allocation percentages.

97. Refer to Case No. 2017-00179, Post Case Files, KPCO_2020_12CP_Allocation_Analysis.xlsx filed April 13, 2020, KPCO_2019_12CP_Allocation_Analysis.xlsx filed October 2, 2019,

KPCO_2018_12CP_Allocation_Analysis.xlsx filed December 10, 2018, and Kentucky Power's Integrated Resource Plan Section 6, page 185 of 2268. The coincident peaks listed in each of the Allocation Analyses do not match the system peaks listed in the IRP. Reconcile the differences, and explain which the analyses contains the correct data.

98. Refer to the Vaughan Testimony, page 34, lines 20–21, which discuss Kentucky Power's proposal to eliminate the special coal provisions in Tariff C.S.-I.R.P. Explain what effect this proposal will have on the contracts between Kentucky Power and customers currently receiving service through the special coal provisions of Tariff C.S.-I.R.P.

99. Refer to the Vaughan Testimony, page 35, lines 5–9, which discusses Kentucky Power's proposal to eliminate the special coal provisions in Tariff C.S.-I.R.P. Explain how the special coal provisions in Tariff C.S.-I.R.P. have been difficult to manage operationally.

100. Refer to the Vaughan Testimony, page 35, lines 7–9, which explains that the special coal provisions in Tariff C.S.-I.R.P. are not necessary due to Kentucky Power's proposal to add a Demand Response Tariff to its tariff. If the Commission denies the new Demand Response Tariff, indicate whether Kentucky Power would still propose to eliminate the special coal provisions in Tariff C.S.-I.R.P.

101. Refer to the Vaughan Testimony, Exhibit AEV-1, page 60 of 65, which provides cost support for the energy credits in Tariff COGEN/SPP I and Tariff COGEN/SPP II. Explain why the Primary Energy Loss amount of 1.35 percent was used to calculate the Loss Adjustment (Potential Loss Savings) instead of the Compound Loss Factor of 6.7 percent.

102. Refer to the Vaughan Testimony, Exhibit AEV-1, page 60 of 65, which provides cost support for the energy credits in Tariff COGEN/SPP I and Tariff COGEN/SPP II. Provide supporting documentation for the On-Peak and Off-Peak Avoided Energy Costs (2020-2022 Average) of $3.04 and $2.27, respectively.

103. Refer to the Direct Testimony of Brian K. West (West Testimony), page 8, lines 4–7. If Kentucky Power is granted the proposed use of the unprotected excess ADIT balance to offset the increase in base rates for 2021, explain whether Kentucky Power anticipates a cash shortfall or increased need for financing. If so, state what amount and type of financing Kentucky Power anticipates.

104. Refer to the West Testimony, page 21, lines 11–12, which explains that Flex Pay daily fixed charges will be based on the number of days in the billing cycle. Also, refer to the application, Exhibit E, page 62 of 216, Kentucky Power's proposed Flex Pay Program Tariff, Terms and Conditions number 1, which states that Flex Pay daily fixed charges will be based on 1/30 of the total fixed charges. Explain whether all billing cycles under the Flex Pay Tariff will be 30 days long. If not, explain why the Flex Pay daily fixed charges should be based on 1/30 of the total fixed charges and not based on the number of days in the billing cycle.

105. Refer to the West Testimony, page 23, lines 18–20, which states that as a condition of receiving service under the Flex Pay Tariff, customers with a past-due amount who want to enroll in the Flex Pay Program have to pay at least 50 percent of the entire account balance. Also, refer to the application, Exhibit E, page 62 of 216, Kentucky Power's proposed Flex Pay Program Tariff, Terms and Conditions number 2, which states that as a condition of receiving service under the Flex Pay Tariff, customers with a past-

due amount who want to enroll in the Flex Pay Program can carry up to $1,500 of the account balance to the Flex Pay account, but does not seem to indicate that such customers must pay at least 50 percent of the entire account balance. Explain which one of these conditions is correct. If both are correct, explain why the 50 percent requirement is not included in the proposed tariff.

106. Refer to the Direct Testimony of Heather M. Whitney, page 16, lines 5–18. Explain whether Kentucky Power provides a retirement and security plan in tandem with the 401(k) plan.

107. Refer to the Direct Testimony of Cynthia G. Wiseman (Wiseman Testimony), page 9, lines 5–19.

a. Provide an explanation of the Customer Relationship Management (CRM) project detailing how a 360-degree view is achieved.

b. Provide all marketing materials associated with Customer Relationship Management project.

108. Provide an update to the Home Energy Management system. Also provide all associated marketing materials.

109. Refer to the Wiseman testimony, page 23, lines 5–7.

a. Provide the all grants and the economic impact associated with these grants since Case No. 2017-00179.

b. Provide any economic development opportunities Kentucky Power is evaluating that will increase energy sales over the next five years.

110. Refer to Kentucky Power's Response to Commission Staff's Third Request for Information (Response to Staff's Third Request), Item 1,

KPCO_R_KPSC_3_1_Attachment_15_VaughanWP1.xlsx, Cogen tab, rows 306 through 354. Provide updated information for the Calculation of Cost Escalation Rates and Calculation of Meter O&M Expense as % of Original Cost (Per Books Total Company Values).

111. Refer to Kentucky Power's Response to Staff's Third Request, Item 1, KPCO_R_KPSC_3_1_Attachment_15_VaughanWP1.xlsx, Cogen tab. 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_Attachment_73_AEVWP3_Rate_Design.xlsx, Cogen tab. Explain any changes in assumptions and methods of calculation in the Cogen tab between Case No. 2017-00179 and the instant proceeding.

112. If the Commission were to approve the Grid Modernization Rider, explain whether Kentucky Power would request either a Certificate of Public Convenience and Necessity (CPCN) or a declaratory order that the a CPCN is not required prior to constructing projects for which costs would be recovered in the Grid Modernization Rider.

113. If Kentucky Power currently has a mobile app, provide the number of customers who are enrolled in it.

114. Provide the monthly class peak demands and usage for the last seven years.

115. Refer to Case No. 2014-00396,[7] Vaughan Testimony, Exhibit AEV-2. Provide a similar analysis using the zero intercept method for determining the customer and demand portions.

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[7] Case No. 2014-00396, *Application of Kentucky Power Company for: (1) A General Adjustment of Its Rates for Electric Service; (2) An Order Approving Its 2014 Environmental Compliance Plan; (3) An Order Approving Its Tariffs and Riders; and (4) An Order Granting All Other Required Approvals and Relief,* Application (filed Dec. 23, 2014).

116. Provide the number of the all complaints by category (e.g., rates, service, and outage) annually since 2017.

117. Identify the number of rebuilt poles, reconductored poles, and replacement poles installed since December 31, 2017.

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DATED AUG 10 2020

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