

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF KENTUCKY)	
POWER COMPANY FOR: (1) APPROVAL OF)	
CONTINUATION OF ITS TARGETED ENERGY)	
EFFICIENCY PROGRAM; (2) AUTHORITY TO)	
RECOVER COSTS AND NET LOST REVENUES,)	CASE NO.
AND TO RECEIVE INCENTIVES ASSOCIATED)	2022-00392
WITH THE IMPLEMENTATION OF ITS DEMAND-)	
SIDE MANAGEMENT PROGRAMS; (3))	
ACCEPTANCE OF ITS ANNUAL DSM STATUS)	
REPORT; AND (4) ALL OTHER REQUIRED)	
APPROVALS AND RELIEF)	

COMMISSION STAFF'S FIRST 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 is due on December 9, 2022. The Commission directs Kentucky Power to the Commission's July 22, 2021 Order in Case No. 2020-00085¹ regarding filings with the Commission. Electronic documents shall be in portable document format (PDF), shall be searchable, and shall be appropriately bookmarked.

Each response shall include the question to which the response is made and 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

¹ Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID-19* (Ky. PSC July 22, 2021), Order (in which the Commission ordered that for case filings made on and after March 16, 2020, filers are NOT required to file the original physical copies of the filings required by 807 KAR 5:001, Section 8).

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, 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 and scanned 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 2. Explain whether Kentucky Power anticipates including any of the programs terminated in Case No. 2017-00097² or has any

² Case No. 2017-00097, *Electronic Investigation of The Reasonableness of The Demand Side Management Programs and Rates of Kentucky Power Company* (Ky. PSC Jan. 18, 2018).

reason to believe that those programs or some variation of those programs should not be included in the GDS Associates, Inc. (GDS) market potential study. If not, explain why.

2. Refer to the Direct Testimony of Scott E. Bishop (Bishop Testimony), page 4, lines 8–9 and lines 15–16.

a. Explain why Kentucky Power is proposing to keep the participation level the same at 98 customers.

b. Explain how many customers participated in the Targeted Energy Efficiency (TEE) program in each of the last three years.

c. Explain whether the local community action agencies working with Kentucky Power have made suggestions to improve the TEE program. If so, explain the suggested improvements and whether Kentucky Power incorporated any into its RFP or program design.

3. Refer to the Bishop Testimony, page 5, lines 10–17.

a. Provide a copy of the market potential study request for proposal. Include with the response any specific directions Kentucky Power provided to GDS regarding the investigation of potential energy efficiency or demand response programs resulting from the Commission's prior Order in Case No. 2021-00420.³

b. Explain whether the local community action agencies, the Sierra Club or other groups working with Kentucky Power have made suggestions to implement new programs or to restart previous EE or demand response programs for either

³ Case No. 2021-00420, *Electronic Application of Kentucky Power Company for: (1) Approval of Continuation of Its Targeted Energy Efficiency Program; (2) Authority to Recover Costs and Net Lost Revenues, and to Receive Incentives Associated with the Implementation of Its Demand-Side Management Programs; (3) Acceptance of Its Annual DSM Status Report; (4) Authorization to Conduct a Market Potential Study; and (5) All Other Required Approvals and Relief* (Ky. PSC Dec. 27, 2021).

residential or commercial customers. If so, explain the suggested improvements and whether Kentucky Power incorporated any into its RFP or program design.

c. Provide a copy of the GDS market potential study once it has been completed.

4. Refer to the Application, page 6. In detail, explain why the recommendation of the 50/50 split for cost recovery by the consultant was made.



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DATED DEC 01 2022

cc: Parties of Record

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