Steven L. Beshear Governor

Robert D. Vance, Secretary Environmental and Public Protection Cabinet

Larry R. Bond Commissioner Department of Public Protection

Timothy C. Mosher American Electric Power 101A Enterprise Drive P. O. Box 5190 Frankfort, KY 40602



Commonwealth of Kentucky

Public Service Commission
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February 19, 2008

Mark David Goss Chairman

> John W. Clay Vice Chairman

Caroline Pitt Clark Commissioner

RE: Case No. 2007-00522

Please see enclosed data request from Commission Staff in the above case.

If you need further assistance, please contact my staff at (502) 564-3940.

Sincerely,

Beth O'Donnell Executive Director

BOD/tw Enclosure



COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

AN EXAMINATION OF THE APPLICATION)	
OF THE FUEL ADJUSTMENT CLAUSE OF)	CASE NO. 2007-00522
KENTUCKY POWER COMPANY FROM MAY)	
1, 2007 THROUGH OCTOBER 31, 2007)	

SUPPLEMENTAL DATA REQUEST OF COMMISSION STAFF TO KENTUCKY POWER COMPANY

Kentucky Power Company ("Kentucky Power"), pursuant to 807 KAR 5:001, is to file with the Commission the original and 5 copies of the following information, with a copy to all parties of record. The information requested herein is due on or before March 6, 2008. Responses to requests for information shall be appropriately bound, tabbed and indexed. 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 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 responses 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 requests 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.

- 1. Refer to the Direct Testimony of Errol K. Wagner ("Wagner Testimony") at 3. Mr. Wagner states that marginal transmission line losses, either charges or credits, are now being recorded in sub-accounts of Account 447, Sales for Resale.
- a. State whether the Federal Energy Regulatory Commission ("FERC") requires Kentucky Power to record marginal transmission line losses in Account 447. If yes, provide the regulation, order, or other document in which the requirement is made. If no, explain why Account 447 is the appropriate account to record the charges and credits for the line losses.
- b. List all items that Kentucky Power has recorded in the sub-accounts 4470207 and 4470208.
- 2. Refer to Wagner Testimony at 7. If marginal line losses and average line losses had been equal for the 7 months ended December 31, 2007, is it correct, absent the change in the treatment of transmission line losses, that the \$7 million for which Kentucky Power now seeks recovery would have been included in its calculation of fuel expenses during that time period? If no, explain.

- 3. Refer to Wagner Testimony at 8. For the 7 months ended December 31, 2007, provide a side-by-side comparison of the monthly system sales clause factors as filed and as they would have been filed under the pre-June 1, 2007 treatment of transmission line losses.
- 4. Refer to Wagner Testimony at 8. Provide the calculations that show the derivation of the \$2.5 million estimated reduction in Kentucky Power's customers' bills due to the increased level of off-system sales margins.
- 5. On May 1, 2006, FERC issued its order requiring PJM Interconnection, LLC to implement the locational marginal loss method. American Electric Power ("AEP") System was a party to the FERC proceeding. Explain why, in light of the date of the FERC order and AEP's participation in the FERC proceeding, Kentucky Power failed to advise the Commission of the possible changes in the treatment of transmission line losses before February 1, 2008.
- Provide updated versions of Exhibits EKW 1 and 2 with the results for January 2008 added.
- 7. Exhibit EKW-3 shows a 6-month average line loss of 9.028 percent for January through June 2007 and a 3.896 percent average line loss for July through December 2007. State whether the reduction in line loss is entirely attributable to the change in the method of accounting for transmission line losses. If not attributable to the change in accounting methods, identify and describe the other factors contributing to the reduction.

Beth O Donnell
Executive Director
Public Service Commission
P. O. Box 615
Frankfort, Kentucky 40602

DATED February 19, 2008

cc: All Parties