## COMMONWEALTH OF KENTUCKY

## BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

JOINT APPLICATION PURSUANT TO 1994 HOUSE ) BILL NO. 501 FOR THE APPROVAL OF KENTUCKY ) POWER COMPANY'S COLLABORATIVE DEMAND-SIDE ) MANAGEMENT PROGRAMS AND FOR AUTHORITY ) ( TO IMPLEMENT A TARIFF TO RECOVER COSTS, ) 2 NET LOST REVENUES AND RECEIVE INCENTIVES ) ASSOCIATED WITH THE IMPLEMENTATION OF THE ) KENTUCKY POWER COMPANY COLLABORATIVE ) DEMAND-SIDE MANAGEMENT PROGRAMS )

Case No. 2009-00337

## SECOND 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 four copies of the following information, with a copy to all parties of record. The information requested herein is due no later than November 25, 2009. 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 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, 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 Kentucky Power's response to Item 1 of Commission Staff's First Data Request ("Staff's First Request"). On page 2 of 2, Kentucky Power provides the calculation of the 2009 values which appear on Schedule C, page 16A. In column "HEHP – Mobile Home," a value of \$97.57 is calculated. However, page 16A of Schedule C filed in the application, and page 16A of the revised Schedule C filed in response to Item 10 of Staff's First Request, show a 2009 value for "High Efficiency Heat Pump – Mobile Home" of \$139.99. Explain this discrepancy. If a correction is necessary, provide a revised copy of all affected schedules.

Refer to the response to Item 7 of Staff's First Request. Kentucky Power states on page 1 of this response that, on Schedule C, "the formula in Column 4, (1) X (3) should be removed and the formula (4)/1 should be shown in Column 3." Explain why Kentucky Power did not make this change on the revised schedules provided on

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pages 2-4 of this response and the revised schedules filed in response to Item 10 of Staff's First Request.

3. Refer to the response to Item 10 of Staff's First Request, page 1.

a. Kentucky Power states its agreement that, in the application, Line 6 on Schedule C, page 17, should have been shown as 5,573,227. Kentucky Power also states that pages 15 A-C have been revised in response to 9.b. of Staff's First Request. Explain why, when filing the revised Schedule C included in this response, Kentucky Power did not revise page 17 based on the revisions made to pages 15A-C.

b. Kentucky Power states that "[t]he residential DSM midpoint factor has been revised to \$.00630 from the previously filed \$.000641." Did Kentucky Power intend to state that the factor had been revised to \$.000641 from the previously filed \$.000633?

Jeff Derovien Executive Director Public Service Commission P. O. Box 615 Frankfort, Kentucky 40602

DATED NOV 1 6 2009

cc: All Parties

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