

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, )  
AND TO RECEIVE INCENTIVES ASSOCIATED )  
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 )

CASE NO.  
2019-00410

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 the original and an electronic version of the following information. The information requested herein is due on or before December 6, 2019. Responses to requests for information 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.

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. 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, page 4 of 74, Summary Information (All Programs) As of December 31, 2018. Also, refer to Case No. 2018-00377,<sup>1</sup> revised application, Exhibit 3, page 4 of 74, Summary Information (All Programs) As of December 31, 2017.

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<sup>1</sup> Case No. 2018-00377, *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; and (4) All Other Required Approvals and Relief* (Ky. PSC Nov. 15, 2018).

a. Refer to the Actual In-Place Energy Savings. Explain why the sum of the as of December 31, 2017 PTD kWh of 672,997,742 in the Exhibit filed in Case No. 2018-00377, and the December 31, 2018 YTD kWh of 2,560,320 in the Exhibit filed in this proceeding does not sum to the as of December 31, 2018 PTD of 702,894,856 kWh.

b. Refer to the Total kW Reductions, Winter. Explain why the sum of the as of December 31, 2017 PTD kW of 40,482 and the YTD kW of 506 as of December 31, 2018, does not sum to the as of December 31, 2018 PTD of 45,256 kW.

c. Refer to the total kW Reductions, Summer. Explain why the sum of the as of December 31, 2017 PTD kW of 19,891 and the YTD kW of 530 does not sum to the as of December 31, 2018 PTD of 24,572 kW.

2. Refer to Exhibit 2, page 5 of 74, Targeted Energy Efficiency.

a. Explain why there is a loss of two Non All Electric participants for November.

b. Refer to Case No. 2018-00377, revised application, Exhibit 3, page 6. Reconcile the differences in the 2018 participant and expense forecast in the comment section filed in this case and in Case No. 2018-00377.

3. Refer to the application, Exhibit 2, page 6 of 74, Whole House Efficiency. Explain why Total Year-to-Date costs of \$35,684 exceed the forecasted budget from 2018 of \$32,031.

4. Refer to the Application, Exhibit 2, page 23 of 74, CI Prescriptive Custom. Explain why Total Year-to-Date costs of \$948,406 exceed the forecasted budget from 2018 of \$682,137.

5. Refer to the application, Exhibit 2, page 24 of 74, New Construction. Explain why the Total Year-to-Date costs of \$102,657 exceed the forecasted budget of \$62,801.

6. Refer to the Direct Testimony of Scott E. Bishop (Bishop Testimony), page 4.

a. Refer to lines 3–6. Provide the annual Targeted Energy Efficiency Program participants for the past ten years.

b. Refer to lines 9–19. Also, refer to the final Order in Case No. 2019-00245, page 4.<sup>2</sup> In Case No. 2019-00245, the Commission approved the removal of the requirement for applicants to apply for available weatherization programs and accept services if eligible and available in order to participate in the Home Energy Assistance Program.

(1) Explain whether Kentucky Power believes that if the increase in activity in 2018 in the Targeted Energy Efficiency Program is due to this former requirement.

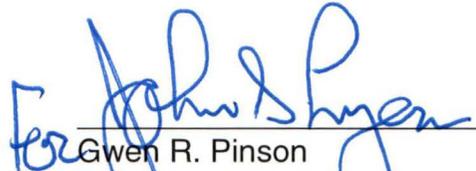
(2) Explain whether Kentucky Power believes that in the absence of this requirement, such activity will remain at or greater than the 2018 level.

c. Explain what steps community action agencies are undertaking to manage their spending for the rest of 2019 to stay within the approved program budget and describe the impact, if any, on eligible participants.

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<sup>2</sup> Case No. 2019-000245, *Electronic Application of Kentucky Power Company to: 1) Modify Kentucky Power Company's Residential Energy Assistance Program; 2) Approve the Amended Operating Agreement; and 3) Grant All Other Relief to Which It May Be Entitled* (Ky. PSC Sept. 11, 2019).

7. Refer to Bishop Testimony, page 6, lines 13–6, regarding Schedule C.  
Clarify whether this refers to Exhibit 4, as stated in the testimony, or Exhibit 5.

  
Gwen R. Pinson  
Executive Director  
Public Service Commission  
P.O. Box 615  
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DATED NOV 26 2019

cc: Parties of Record

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