

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)	CASE NO.
ACCOUNTING PRACTICES TO ESTABLISH)	2020-00174
REGULATORY ASSETS AND LIABILITIES; (4))	
APPROVAL OF A CERTIFICATE OF PUBLIC)	
CONVENIENCE AND NECESSITY; AND (5))	
ALL OTHER REQUIRED APPROVALS AND)	
RELIEF)	

COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
TO MOUNTAIN ASSOCIATION FOR COMMUNITY ECONOMIC DEVELOPMENT,
KENTUCKIANS FOR THE COMMONWEALTH, AND
KENTUCKY SOLAR ENERGY SOCIETY

Mountain Association for Community Economic Development (Mountain Association), Kentuckians for the Commonwealth (KFTC), and Kentucky Solar Energy Society (Kentucky Solar Energy) (collectively, Joint Intervenors), pursuant to 807 KAR 5:001, are to file with the Commission an electronic version of the following information. The information requested herein is due on November 2, 2020. The Commission directs Joint Intervenors to the Commission's March 16, 2020 and March 24, 2020 Orders in Case No. 2020-00085¹ 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

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.

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.

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.

Joint Intervenors shall make timely amendment to any prior response if Joint Intervenors obtain 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 Joint Intervenors fail or refuse to furnish all or part of the requested information, Joint Intervenors shall provide a written explanation of the specific grounds for their 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, Joint Intervenors 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 Direct Testimony of Joshua Bills (Bills Testimony), page 5, lines 4–5. Mr. Bills asserts that the proposed Tariff NMS II does not address the impact of net metering customers who take service under GS and LGS and already pay demand charges under those tariffed rates, from which fixed costs are recovered. Provide Mr. Bills’s recommendation for addressing demand charges in a net metering tariff for GS and LGS customers.

2. Refer to the Bills Testimony, unnumbered page 5, lines 6–21.

a. Mr. Bills states that some benefits will be lost, yet only lists the loss of the ability for GS and LGS customers to levelize their electric payments. Provide all other benefits that will be lost through the adoption of the proposed Tariff NMS II.

b. Provide the billing evaluations that support the allegation that businesses are able to offset high winter electric bills with excess solar generation in non-winter months.

3. Refer to the Direct Testimony of James Owen (Owen Testimony), page 25, lines 5–14. Provide all supporting studies and quantifications that the proposed increase to the basic service charge will have a detrimental impact on low-income customers, low-usage customers, customers employing distributed energy resources on site, and energy efficiency goals.

4. Refer to the Owen Testimony, page 27, lines 15–18. Provide all supporting studies that low-income customers are more likely to reside in multi-family apartments, specifically in Kentucky Power’s service territory.

5. Refer to the Owen Testimony, page 28, lines 7–11. Provide all studies and support documentation that fixed charges punish customers who employ distributed generation.

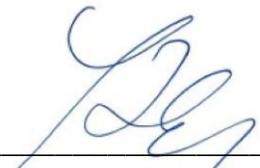
6. Refer to the Owen Testimony, page 31, lines 1–4.

- a. Explain whether Mr. Owen has conducted a cost-benefit analysis.
- b. If not, explain why not and why it is not provided as part of his testimony.
- c. Explain whether the data necessary to conduct a cost-benefit analysis is available.

7. Refer to the Direct Testimony of Andrew McDonald, page 6, lines 11–13. Provide a study of the economic impact of solar businesses operating in Eastern Kentucky.

8. Refer to the McDonald Testimony, page 9, lines 15–18.

- a. Explain whether Mr. McDonald has conducted his own cost-benefit analysis.
- b. If not, explain why it was not conducted.
- c. Explain whether the data necessary to conduct a cost-benefit analysis is available.



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DATED OCT 20 2020

cc: Parties of Record

Case No. 2020-00174

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