

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 SECOND 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, is to file with the Commission an electronic version of the following information. The information requested herein is due on February 22 2021. The Commission directs Joint Intervenors to the Commission's March 16, 2020 and March 24, 2020 Orders in Case No. 2020-00085<sup>1</sup> 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

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<sup>1</sup> 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 they 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 James Owen (Owen Direct Testimony), page 36, lines 7–13.

a. Explain whether Mr. Owen agrees that the dollar-value costs and benefits of distributed energy resources vary by time of day, and, if Mr. Owen does not agree, explain why not.

b. Explain why a net metering credit generated at a certain time of day should be allowed to be used during a different time period. Include in your explanation how allowing this would maintain a price signal for the time-varying costs and benefits of distributed energy resources (DER).

c. Explain why customers should have the choice to opt-in to the Company's proposed netting periods.

2. Refer to the Owen Direct Testimony, page 37, lines 7–14. Identify and describe specific methodologies for calculating each of the benefits listed in this Testimony.



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DATED FEB 12 2021

cc: Parties of Record

Case No. 2020-00174

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