

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.
KENTUCKY POWER COMPANY FROM	)	2014-00225
NOVEMBER 1, 2013 THROUGH APRIL 30, 2014	)	

**KENTUCKY INDUSTRIAL UTILITY CUSTOMERS, INC. AND THE ATTORNEY  
GENERAL OF THE COMMONWEALTH OF KENTUCKY'S RESPONSE TO  
KENTUCKY POWER COMPANY'S INITIAL REQUEST FOR INFORMATION**

1. Please refer to the testimony of Mr. Hayet and the table at page 14, line 6 and above, titled "Allocation \$/MWh By Method:"

- (a) Please provide all spreadsheets, work papers, calculations, and analyses, and all calculations relating to, consulted, or reviewed, that were performed, consulted or relied upon by Mr. Hayet to develop this table. The requested information should be provided by unit, on an hour by hour basis, and in an electronic format, with formulas intact and visible, and no pasted values.
- (b) Please describe in detail the computational steps, if any, used by Mr. Hayet in calculating the values appearing in the table.
- (c) Please identify any assumptions made by Mr. Hayet in developing this table.
- (d) Please provide the detailed basis, including any documents or studies supporting each such assumption, for each assumption identified in the response to subpart (c) of this data request.

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- (e) To the extent not provided in response to subpart (d) of this data request, please identify and provide each source for the values appearing in the table.

RESPONSE 1:

- a. See the response to Staff 1-1 and attachment "KIUC\_AG\_response\_to\_Staff\_1-1.xlsx".
- b. The calculations to determine the "Kentucky Power Company Filing" values were determined from the Jan-Apr 2014 tabs provided in KIUC 1-5. \$/MWh values were computed from the generation and fuel costs included in those tabs.

The calculations to determine the EKPC Method summary, were summarized based on using the EKPC fuel and purchase power cost allocation, as calculated within the "Calculations" tab and summarized using a Pivot table, and then aggregated by unit to determine the \$/MWh results.

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For further explanation of the calculations performed based on the EKPC stacking method and cost allocation procedure, see "KIUC\_AG\_response\_to\_Staff\_1-1.xlsx" and refer to the "notes" tab.

- c. The lower portion of the table assumes that the values provided in KIUC 1-5 were consistent with the hourly data provided in KIUC 1-12 attachment 3, which was purported to be the hourly data used in the Company's reconstruction process. See also the responses to a and b above.
- d. See the responses to a, b and c above, as well as Mr. Hayet and Mr. Kollen's testimony for support of the assumptions used in developing the fuel and purchase power cost allocation using the EKPC methodology.
- e. Summary value calculations for the EKPC method are found in the "RESULTS PIVOT" tab and the KPCO summary calculations on the "Jan-Apr KIUC 1-5" tab. A copy of the

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tables used in Hayet Testimony are provided and sourced on the "CHARTS FOR  
TESTIMONY" tab.

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2. Please refer to the testimony of Mr. Hayet and the table at page 16, line 11 and above, titled "Allocation of Fuel Costs and Purchase Power By Method:"
  - (a) Please provide all spreadsheets, work papers, calculations, and analyses, and all calculations relating to, consulted, or reviewed, that were performed, consulted or relied upon by Mr. Hayet to develop this table. The requested information should be provided by unit, on an hour by hour basis, and in an electronic format, with formulas intact and visible, and no pasted values.
  - (b) Please describe in detail the computational steps, if any, used by Mr. Hayet in calculating the values appearing in the table.
  - (c) Please identify any assumptions made by Mr. Hayet in developing this table.
  - (d) Please identify and explain why, including any assumptions or any documents or studies supporting such explanation, the total fuel costs for each month are different between the "Kentucky Power Company Filing" portion of the table and the "Hourly Restack (EKPC Method) Summarized Monthly" portion of the table.

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- (e) Please provide the detailed basis, including any documents or studies supporting such assumption, for each assumption identified in the response to subpart (c) and (d) of this data request.
- (f) To the extent not provided in response to subpart (e) of this data request, please identify and provide each source for the values appearing in the table.

RESPONSE 2:

- a. See the response to Staff 1-1 and attachment "KIUC\_AG\_response\_to\_Staff\_1-1.xlsx".
- b. The calculations to determine the "Kentucky Power Company Filing" values were determined from the Jan-Apr 2014 tabs provided in KIUC 1-5. Specifically, the lines labeled "4. OFF SYSTEM ALLOCATION OF SOURCES" and "5. FUEL IDENTITIFED FOR NER (3-4)" were used.

The calculations to determine the EKPC Method results were summarized from the EKPC allocation as calculated on tab "Calculations" and summarized using a Pivot table, then aggregated by month to determine the allocations to NL and OSS.

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For further explanation of the calculations performed based on the EKPC stacking method and cost allocation procedure, see "KIUC\_AG\_response\_to\_Staff\_1-1.xlsx" and refer to the "notes" tab.

- c. The lower portion of the table assumes that the values provided in KIUC 1-5 were consistent with the hourly data provided in KIUC 1-12 attachment 3, which was purported to be the hourly data used in the Company's reconstruction process. See also the responses to a and b above.
- d. See the response to Staff data request 1-6 to KIUC/AG.
- e. See the responses to a through d above, as well as Mr. Hayet and Mr. Kollen's testimony for support of the assumptions used in developing the fuel and purchase power cost allocation using the EKPC methodology.
- f. Summary value calculations for the EKPC method are found in the "RESULTS PIVOT" tab and the KPCO summary calculations on the "Jan-Apr KIUC 1-5" tab. A copy of the tables used in Hayet Testimony are provided and sourced on the "CHARTS FOR TESTIMONY" tab.

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3. Please refer to the testimony of Mr. Hayet and the table at page 15, line 10 and above, titled "Allocation \$/MWh by Method:"
- (a) Please provide all spreadsheets, work papers, calculations, and analyses, and all calculations relating to, consulted, or reviewed, that were performed, consulted or relied upon by Mr. Hayet to develop this table. The requested information should be provided by unit, on an hour by hour basis, and in an electronic format, with formulas intact and visible, and no pasted values.
  - (b) Please describe in detail the computational steps, if any, used by Mr. Hayet in calculating the values appearing in the table.
  - (c) Please identify any assumptions made by Mr. Hayet in developing this table.
  - (d) Please provide the detailed basis, including any documents or studies supporting each such assumption, for each assumption identified in the response to subpart (c) of this data request.

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(e) To the extent not provided in response to subpart (d) of this data request, please identify and provide each source for the values appearing in the table.

RESPONSE 3:

- a. See response to Staff 1-1 and attachment "KIUC\_AG\_response\_to\_Staff\_1-1.xlsx".
- b. The range calculation is an absolute value of the difference between the NL and OSS allocation \$/MWh prices, as derived in the previous response.
- c. The lower portion of the table assumes that the values provided in KIUC 1-5 were consistent with the hourly data provided in KIUC 1-12 attachment 3, which was purported to be the hourly data used in the Company's reconstruction process. See also the responses to a and b above.
- d. See the responses to a, b and c above, as well as Mr. Hayet and Mr. Kollen's testimony for support of the assumptions used in developing the fuel and purchase power cost allocation using the EKPC methodology.

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- e. Summary value calculations for the EKPC method are found in the "RESULTS PIVOT" tab and the KPCO summary calculations on the "Jan-Apr KIUC 1-5" tab. A copy of the tables used in Hayet Testimony are provided and sourced on the "CHARTS FOR TESTIMONY" tab.

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4. Please refer to the testimony of Mr. Hayet, page 9, lines 8-9, where he states "it is also contrary to how all of the other utilities in Kentucky operate under the uniform FAC regulations."
  - (a) Please identify all facts relied on by Mr. Hayet in making this statement.
  - (b) Please identify and provide a copy of all documents supporting Mr. Hayet's statement.
  - (c) Please identify each individual (other than counsel for KIUC or the Attorney General) with whom Mr. Hayet, or representatives, employees or principals of J. Kennedy and Associates, Inc., or attorneys, representatives, or employees of Boehm, Kurtz and Lowry (other than counsel for KIUC or the Attorney General), or employees, attorneys or representatives of the Attorney General (other than counsel for KIUC or the Attorney General), communicated with regarding this statement and detail the substance of those communications.
  - (d) Please provide, to the extent not provided in response to subpart (c), a copy of all communications, including documents, memoranda, recordings or notes relating thereto, between "all other utilities in Kentucky" on the one hand, and Mr. Hayet, or

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representatives, employees or principals of J. Kennedy and Associates, Inc., or attorneys, representatives, or employees of Boehm, Kurtz and Lowry, or employees, attorneys and representatives of the Attorney General, on the other, in any way relating to this statement.

RESPONSE 4:

- a. Mr. Hayet discusses the facts he relied on page 9, beginning at line 10 and continuing through page 10, line 12. See also KIUC's response to Staff DR 1-1c. Mr. Kollen also discusses the facts that KIUC relied on in making similar statements beginning on page 17 at line 14 and continuing through page 19 at line 4. While these specific citations are identified within Mr. Hayet and Mr. Kollen's testimony, other portions of their testimony also discuss the facts that led to their conclusions and should also be referred to as well.
- b. See the response to part a above. Mr. Hayet relied on documents that are referenced in both Mr. Hayet and Mr. Kollen's testimony. Furthermore, Mr. Hayet developed his position based on his general review of other data responses filed by Kentucky Utilities Company (Case No. 2014-00227), Louisville Gas and Electric Company (Case No. 2014-

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00228), Duke Energy Kentucky (Case No. 2014-00229), Big Rivers Electric Corporation (Case No. 2014-00230), and East Kentucky Power Cooperative, Inc. (Case No. 2014-00226), in their respective FAC proceedings, which are available on the Commission's website.

- c. Mike Kurtz and Lane Kollen spoke with Mike McNally and Mark David Goss about how EKPC allocates fuel costs between native load and off-system sales in the FAC.
- d. Please see response to Staff 1-7, specifically the attachment "KIUC\_AG\_response\_to\_Staff\_1-7\_Att\_h.pdf"

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5. Please refer to the testimony of Mr. Hayet, page 11, lines 3-5, where he states that “the sum of the minimum capacity of the Company’s online resources exceeded native load for more than 31% of the hours in the four month period of January through April 2014.”
- (a) Please provide all spreadsheets, work papers, calculations, and analyses, and all calculations relating to, consulted, or reviewed, that were performed, consulted or relied upon by Mr. Hayet to develop this testimony. The requested information should be provided by unit, on an hour by hour basis, and in an electronic format, with formulas intact and visible, and no pasted values.
- (b) Please identify any assumptions made by Mr. Hayet in developing this testimony.
- (c) Please provide the detailed basis, including any documents or studies supporting each such assumption, for each assumption identified in the response to subpart (b) of this data request.

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RESPONSE 5:

Note that a minor typographical error occurred in these lines of testimony. The value, 31%, stated on page 11 at line 5 and on page 12 at line 11 of Mr. Hayet's testimony, should have been 30.1%.

- a. See attachment "KIUC\_AG\_response\_to\_Staff\_1-1.xlsx." Specifically, tab "Gen vs Load vs. Min".
- b. This analysis compares economic minimum capacity levels (PSC 2-4 att1), and load after marginal losses (KIUC 2-11 att1) to determine when the sum of the generating unit minimum capacity levels exceed the native load (including marginal losses) in an hour.
- c. See response to b above.

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6. Please refer to Mr. Hayet's statement beginning at Page 4, line 4 of his testimony in which he testifies "The use of the EKPC allocation methodology results in a FAC reduction to Kentucky Power's native load customers during the first four months of 2014 of approximately \$12.6 million."
- (a) Please provide all spreadsheets, work papers, calculations, and analyses, and all calculations relating to, consulted, or reviewed, that were performed, consulted or relied upon by Mr. Hayet in computing the \$12.6 million value. The requested information should be provided by unit, on an hour by hour basis, and in an electronic format, with formulas intact and visible, and no pasted values.
- (b) Please describe in detail the computational steps, if any, used by Mr. Hayet in computing the \$12.6 million value.
- (c) Please identify any assumptions made by Mr. Hayet in computing the \$12.6 million value.

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- (d) Please provide the detailed basis, including any documents or studies supporting each such assumption, for each assumption identified in the response to subpart (c) of this data request.
- (e) To the extent not provided in response to subpart (d) of this data request, please identify and provide each source for the values used in computing the \$12.6 million value.

RESPONSE 6:

- a. See attachment "KIUC\_AG\_response\_to\_Staff\_1-1.xlsx."
- b. The \$12.6 million amount was derived as the difference in the Jan-Apr 2014 Kentucky Power fuel and purchase power cost allocation to native load versus KIUC's result using the EKPC method. The summary of this calculation is found in the table on page 17 of Mr. Hayet's testimony. See the response to part a above for the location of the calculations.
- c. The KIUC fuel cost allocation to native load assumes that the values provided in KIUC 1-5 were consistent with the hourly data provided in KIUC 1-12 attachment 3, which was

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purported to be the hourly data used in the Company's reconstruction process. See also the responses to a and b above.

- d. See the responses to a, b and c above, as well as Mr. Hayet and Mr. Kollen's testimony for support of the assumptions used in developing the fuel and purchase power cost allocation using the EKPC methodology.
- e. Summary value calculations for the EKPC method are found in the "RESULTS PIVOT" tab and the KPCO summary calculations on the "Jan-Apr KIUC 1-5" tab. A copy of the tables used in Hayet Testimony are provided and sourced on the "CHARTS FOR TESTIMONY" tab.

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7. Please refer Mr. Hayet's statement beginning on Page 8, line 4 of his testimony "But generation dispatch and fuel cost allocation to ensure that the FAC rate is reasonable are two completely different matters."
- (a) Please provide all regulatory orders, handbooks, treatises or other studies or documents relied upon by Mr. Hayet in making the identified statement.
- (b) To the extent not provided in response to subpart (a) of this data request please provide all facts and other bases relied upon by Mr. Hayet in making the identified statement.

RESPONSE 7:

- a. Mr. Hayet believes that the manner in which PJM utilizes no load costs for RTO purposes is appropriate, however, the manner in which Kentucky Power performs its fuel cost allocation for FAC purposes by assigning 100% of the no load costs in every hour to native load is not. Mr. Hayet is not aware of any regulatory order, handbook, treatise or other studies that exist that would dictate that a utility should ensure that all no load costs are allocated entirely to native load in every hour. EKPC states that its cost allocation

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ensures that native load customers are protected “from having no-load cost assigned inappropriately.”

Duke Energy Kentucky states that its method allocates fuel costs, including no-load costs, to both native load and off-system sales.

KU/LG&E state that all fuel costs are allocated to both native load and off-system sales. Big Rivers states that all fuel costs are shared equally between native load and off-system sales.

When compared to Big Rivers, KU, LG&E, EKPC, and Duke Energy Kentucky, Kentucky Power appears to be the only utility that allocates 100% of the no load fuel costs entirely to native load. The fact that the Company acquired the Mitchell capacity exacerbates the problem since Big Sandy 1 and 2 are not needed to serve native load in many hours, and are therefore sold off-system. In those hours the Company obligates native load customers, through its fuel cost allocation procedure, to pay 100% of the no load fuel costs and other minimum segment costs, while the Company keeps 100% of the profit margins from the off-system sales. The Company fuel cost allocation method is simply an unreasonable approach.

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- b. See the response to part a above, and also see KIUC's response to Staff DR 1-1c.

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8. Please refer to Mr. Hayet's testimony beginning at Page 13, line 11 in which he stated: "No, the fuel cost results that the Company provided included the allocation of fuel costs to native load customers and did not include fuel costs or loads associated with the wholesale requirements customers (Vanceburg and Olive Hill)."
- (a) Please identify the data request response or other source by which Mr. Hayet claims Kentucky Power provided the indicated fuel costs results.
- (b) To the extent the source of the indicated fuel cost result is not a response by Kentucky Power to a data request in this proceeding, please provide all documents comprising the indicated fuel cost results or otherwise relied upon by Mr. Hayet in making the statement.

RESPONSE 8:

- a. Mr. Hayet believes that based on a review he conducted of the Company's two hourly examples provided in response to KIUC 1-21 and KIUC 2-2, the load data provided in KIUC 1-11 (which included load data for Vanceburg and Olive Hill), and the load and loss data provided in response to KIUC 2-11, that the fuel costs that were provided in

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KIUC 1-12 only included the fuel costs that were allocated by the Company to native load and off-system sales. In other words, the fuel costs included in KIUC 1-12 did not include the fuel costs allocated to the Cities of Vanceburg and Olive Hill.

- b. See response to part a above.

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9. To the extent not previously requested and provided, please provide all spreadsheets, work papers, calculations, and analyses, and all calculations relating to, consulted, or reviewed, that were performed, consulted or relied upon by Mr. Hayet with respect to any calculations or quantified values in his testimony. The requested information should be provided by unit, on an hour by hour basis, and in an electronic format, with formulas intact and visible, and no pasted values.
- (a) Please identify any assumptions made by Mr. Hayet in developing or making the identified calculation or quantified value.
- (b) Please provide the detailed basis, including any documents or studies supporting each such assumption, for each assumption identified in the response to subpart (a) of this data request.
- (c) To the extent not provided in response to subpart (b) of this data request, please identify and provide each source for the values used in the identified calculations.

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RESPONSE 9:

The requested information was provided in response to other requests. For example, see KIUC's response to Staff 1-7.

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10. Please refer to the testimony of Mr. Kollen, pages 17-18 regarding the fuel cost allocation methodology allegedly utilized by East Kentucky Power Cooperative ("EKPC").
- (a) Please identify and provide a copy of all documents or studies supporting Mr. Kollen's interpretation of EKPC's fuel allocation methodology.
- (b) Please identify any employees, attorneys, or other representatives of EKPC with whom Mr. Kollen, or representatives, employees or principals of J. Kennedy and Associates, Inc., or attorneys, representatives, or employees of Boehm, Kurtz and Lowry, or employees, attorneys or representatives of the Attorney General, communicated with regarding EKPC's fuel allocation methodology and detail the substance of those communications.
- (c) Please provide, to the extent not provided in response to subpart (a), a copy of all communications, including documents, memoranda, recordings or notes relating thereto, between representatives of EKPC on the one hand, and Mr. Kollen, or representatives, employees or principals of J. Kennedy and Associates, Inc., or attorneys, representatives, or employees of Boehm, Kurtz and Lowry, or employees, attorneys or representatives of

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the Attorney General on the other, in any way relating to EKPC's fuel allocation methodology.

- (d) Please identify all Commission Orders specifically approving EKPC's fuel cost allocation methodology described by Mr. Kollen on pages 17-18 of his testimony.

RESPONSE 10:

- a. See EKPC's data response to Staff 1-29 in PSC Case No. 2014-00226.
- b. Mike Kurtz and Lane Kollen spoke with Mike McNally and Mark David Goss about how EKPC allocates fuel costs between native load and off-system sales in the FAC.
- c. See response to (a) above.
- d. PSC Case No. 2014-00226 is currently ongoing, and therefore an order has not yet been issued in that proceeding. Mr. Kollen is not aware of any prior proceeding in which the Commission affirmatively addressed EKPC's methodology to allocate fuel costs to off-system sales and native load customers.

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11. Please refer to the testimony of Mr. Kollen, page 18 regarding the fuel cost allocation methodology allegedly utilized by Duke Energy Kentucky, Inc. ("Duke").
- (a) Please identify and provide a copy of all documents supporting Mr. Kollen's interpretation of Duke's fuel allocation methodology.
- (b) Please identify all attorneys, employees or other representatives of Duke with whom Mr. Kollen, or representatives, employees or principals of J. Kennedy and Associates, Inc., or attorneys, representatives, or employees of Boehm, Kurtz and Lowry, or employees, attorneys or representatives of the Attorney General, communicated regarding Duke's fuel allocation methodology and detail the substance of those communications.
- (c) Please provide, to the extent not provided in response to subpart (a), a copy of all communications, including documents, memoranda, recordings or notes relating thereto, between representatives of Duke on the one hand, and Mr. Kollen, or representatives, employees or principals of J. Kennedy and Associates, Inc., or attorneys, representatives, or employees of Boehm, Kurtz and Lowry, or employees, attorneys or representatives of

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the Attorney General on the other, in any way relating to Duke's fuel allocation methodology.

- (d) Please identify all Commission Orders specifically approving Duke's fuel cost allocation methodology described by Mr. Kollen on page 18 of his testimony.

RESPONSE 11:

- a. See Duke Energy Kentucky's data response to Staff 1-29 in PSC Case No. 2014-00229.
- b. There were no discussions with Duke.
- c. See response to (b).
- d. PSC Case No. 2014-00229 is currently ongoing, and therefore an order has not yet been issued in that proceeding. Mr. Kollen is not aware of any prior proceeding in which the Commission affirmatively addressed Duke Energy Kentucky's methodology to allocate fuel costs to off-system sales and native load customers.

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12. Please refer to the testimony of Mr. Kollen, page 18 regarding the fuel cost allocation methodology allegedly utilized by Louisville Gas & Electric Company ("LG&E") and Kentucky Utilities Company ("KU").

(a) Please identify and provide a copy of all documents supporting Mr. Kollen's interpretation of LG&E & KU's fuel allocation methodology.

(b) Please identify all attorneys, employees or other representatives of LG&E or KU with whom Mr. Kollen, or representatives, employees or principals of J. Kennedy and Associates, Inc., or attorneys, representatives, or employees of Boehm, Kurtz and Lowry, or employees, attorneys or representatives of the Attorney General, communicated regarding LG&E & KU's fuel allocation methodology and detail the substance of those communications.

(c) Please provide, to the extent not provided in response to subpart (a), a copy of all communications, including documents, memoranda, recordings or notes relating thereto, between representatives of KU or LG&E on the one hand, and Mr. Kollen, or representatives, employees or principals of J. Kennedy and Associates, Inc., or attorneys,

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representatives, or employees of Boehm, Kurtz and Lowry, or employees, attorneys or representatives of the Attorney General on the other, in any way relating to KU or LG&E's fuel allocation methodology.

- (d) Please identify all Commission Orders specifically approving LG&E & KU's fuel cost allocation methodology described by Mr. Kollen on page 18 of his testimony.

RESPONSE 12:

- a. See KU and LG&E's data responses to Staff 1-25 and 1-27 in PSC Cases No. 2014-00227 and 2014-00228, respectively.
- b. Mike Kurtz spoke with Allyson Sturgeon and Robert Conroy about how LG&E and KU allocate fuel costs between native load and off-system sales for FAC purposes.
- c. See the response to Staff 1-7 and attachment "KIUC\_AG\_response\_to\_Staff\_1-7\_Att\_g.ppt".
- d. PSC Cases No. 2014-00227 and 2014-00228 are currently ongoing, and therefore an order has not yet been issued in those proceedings. Mr. Kollen is not aware of any prior

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proceeding in which the Commission affirmatively addressed either KU or LG&E's methodology to allocate fuel costs to off-system sales and native load customers.

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13. Please refer to the testimony of Mr. Kollen, page 18 regarding the fuel cost allocation methodology allegedly utilized by Big Rivers Electric Corporation (“Big Rivers”).
- (a) Please identify and provide a copy of all documents supporting Mr. Kollen’s interpretation of Big Rivers’ fuel allocation methodology.
- (b) Please identify all attorneys, employees, or other representatives of Big Rivers with whom Mr. Kollen, or representatives, employees or principals of J. Kennedy and Associates, Inc., or attorneys, representatives, or employees of Boehm, Kurtz and Lowry, or employees, attorneys or representatives of the Attorney General, communicated regarding Big Rivers’ fuel allocation methodology and detail the substance of those communications.
- (c) Please provide, to the extent not provided in response to subpart (a), a copy of all communications, including documents, memoranda, recordings or notes relating thereto, between representatives of Big Rivers on the one hand, and Mr. Kollen, or representatives, employees or principals of J. Kennedy and Associates, Inc., or attorneys, representatives, or employees of Boehm, Kurtz and Lowry, or employees, attorneys or

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representatives of the Attorney General on the other, in any way relating to Big Rivers' fuel allocation methodology.

- (d) Please identify all Commission Orders specifically approving Big Rivers' fuel cost allocation methodology described by Mr. Kollen on page 18 of his testimony.

RESPONSE 13:

- a. See Big Rivers' data response to Staff 1-29 in PSC Case No. 2014-00230. See also Big Rivers' data responses to KIUC 1<sup>st</sup> set of data requests.
- b. There were no discussions with Big Rivers about fuel cost allocation in the FAC prior to filing the KIUC/AG testimony.
- c. See response to b.
- d. PSC Case No. 2014-00230 is currently ongoing, and therefore an order has not yet been issued in that proceeding. Mr. Kollen is not aware of any prior proceeding in which the Commission affirmatively addressed Big Rivers' methodology to allocate fuel costs to off-system sales and native load customers.

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14. Please refer to the testimony of Mr. Kollen, Exhibit LK-3:

- (a) Please provide all spreadsheets, work papers, calculations, and analyses, and all calculations relating to, consulted, or reviewed, that were performed, consulted or relied upon by Mr. Kollen to develop this exhibit. The requested information should be provided by unit, on an hour by hour basis, and in an electronic format, with formulas intact and visible, and no pasted values.
- (b) Please describe in detail the computational steps used by Mr. Kollen in calculating the values in this exhibit.
- (c) Please identify any assumptions made by Mr. Kollen in developing this exhibit.
- (d) Please provide the detailed basis, including any documents or studies supporting each such assumption, for each assumption identified in the response to subpart (c) of this data request.
- (e) To the extent not provided in response to subpart (d) of this data request please identify all sources of data used by Mr. Kollen in developing this exhibit.

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RESPONSE 14:

- a. Please see file "KIUC\_AG\_response\_to\_Staff\_1-7\_Att\_b.xlsx" provided in response to Staff 1-7.
- b. The KPCO allocation values were derived using KPCO response to KIUC 1-5. Specifically, the lines labeled "4. OFF SYSTEM ALLOCATION OF SOURCES" and "5. FUEL IDENTIFIED FOR NER (3-4)" were used. The table excludes the allocation of purchase power costs, and therefore only includes fuel costs. See the "Jan-Apr KIUC 1-5" tab for calculations for OSS and NL columns. The "No Load" costs were derived from data provided in the Company's response to Staff 1-29.
- c. Only generation fuel costs were considered for purposes of developing these tables.
- d. See a – c above.
- e. The "KIUC 1\_5 Attach1 Data" tab of the workpaper described in subpart (a) contains the table provided in LK-3.

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15. Please refer to the testimony of Mr. Kollen, Exhibit LK-7:

- (a) Please provide all spreadsheets, work papers, calculations, and analyses, and all calculations relating to, consulted, or reviewed, that were performed, consulted or relied upon by Mr. Kollen to develop this exhibit. The requested information should be provided by unit, on an hour by hour basis, and in an electronic format, with formulas intact and visible, and no pasted values.
- (b) Please describe in detail the computational steps used by Mr. Kollen in calculating the values in this exhibit.
- (c) Please identify any assumptions made by Mr. Kollen in developing this exhibit.
- (d) Please provide the detailed basis, including any documents or studies supporting each such assumption, for each assumption identified in the response to subpart (c) of this data request.
- (e) To the extent not provided in response to subpart (d) of this data request please identify all sources of data used by Mr. Kollen in developing this exhibit.

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RESPONSE 15:

- a. Please see file "KIUC\_AG\_response\_to\_Staff\_1-7\_Att\_c.xlsx" provided in response to Staff 1-7.
- b. The chart was plotted based on data that the Company filed to the Commission. The source of the data is noted on the chart in Exhibit LK-7.
- c. No assumptions were made to create the exhibit.
- d. See the response to c above.
- e. See the responses to a – d above.

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16. Please refer to the testimony of Mr. Kollen, Exhibit LK-8:

- (a) Please provide all spreadsheets, work papers, calculations, and analyses, and all calculations relating to, consulted, or reviewed, that were performed, consulted or relied upon by Mr. Kollen to develop this exhibit. The requested information should be provided by unit, on an hour by hour basis, and in an electronic format, with formulas intact and visible, and no pasted values.
- (b) Please describe in detail the computational steps used by Mr. Kollen in calculating the values in this exhibit.
- (c) Please identify any assumptions made by Mr. Kollen in developing this exhibit.
- (d) Please provide the detailed basis, including any documents or studies supporting each such assumption, for each assumption identified in the response to subpart (c) of this data request.
- (e) To the extent not provided in response to subpart (d) of this data request please identify all sources of data used by Mr. Kollen in developing this exhibit.

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RESPONSE 16:

- a. Please see file "KIUC\_AG\_response\_to\_Staff\_1-7\_Att\_d.xlsx" provided in response to Staff 1-7.
- b. The chart was plotted based on data that the Company filed to the Commission. The source of the data is noted on the chart in Exhibit LK-8.
- c. No assumptions were made to create the exhibit.
- d. See the response to c above.
- e. See the responses to a – d above.

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17. To the extent not previously requested and provided, please provide all spreadsheets, work papers, calculations, and analyses, and all calculations relating to, consulted, or reviewed, that were performed, consulted or relied upon by Mr. Kollen with respect to any calculations or quantified values in his testimony. The requested information should be provided by unit, on an hour by hour basis, and in an electronic format, with formulas intact and visible, and no pasted values.
- (a) Please identify any assumptions made by Mr. Kollen in developing or making the identified calculation or quantified value.
- (b) Please provide the detailed basis, including any documents or studies supporting each such assumption, for each assumption identified in the response to subpart (a) of this data request.
- (c) To the extent not provided in response to subpart (b) of this data request, please identify and provide each source for the values used in the identified calculations.

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RESPONSE 17:

The information requested was previously provided in response to other requests. For example, see KIUC's response to Staff 1-7.

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18. Please refer to Mr. Kollen's statement beginning at Page 6, line 4 of his testimony in which he testifies "I recommend the Commission order Kentucky Power to refund over a six month period \$12.648 million in excessive fuel costs ...."

(a) Please provide all spreadsheets, work papers, calculations, and analyses, and all calculations relating to, consulted, or reviewed, that were performed, consulted or relied upon by Mr. Kollen in computing the \$12.648 million value. The requested information should be provided by unit, on an hour by hour basis, and in an electronic format, with formulas intact and visible, and no pasted values.

(b) Please describe in detail the computational steps, if any, used by Mr. Kollen in computing the \$12.648 million value.

(c) Please identify any assumptions made by Mr. Kollen in computing the \$12.648 million value.

(d) Please provide the detailed basis, including any documents or studies supporting each such assumption, for each assumption identified in the response to subpart (c) of this data request.

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(e) To the extent not provided in response to subpart (d) of this data request, please identify and provide each source for the values used in computing the \$12.648 million value.

RESPONSE 18:

Mr. Kollen relied on the calculations provided by Mr. Hayet as described in response to Item 6 above.

- a. See the response to Item 6(a).
- b. See the response to Item 6(b).
- c. See the response to Item 6(c).
- d. See the response to Item 6(d).
- e. See the response to Item 6(e).

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19. Please refer to Mr. Kollen's calculation, beginning at Page 6, line 6 of his testimony, of the claimed "\$0.864 million in interest through December 31, 2014 calculated at the Company's weighted cost of capital."

(a) Please provide all spreadsheets, work papers, calculations, and analyses, and all calculations relating to, consulted, or reviewed, that were performed, consulted or relied upon by Mr. Kollen in computing the \$0.864 million value. The requested information should be provided in an electronic format, with formulas intact and visible, and no pasted values.

(b) Please describe in detail the computational steps, if any, used by Mr. Kollen in computing the \$0.864 million value.

(c) Please identify any assumptions made by Mr. Kollen in computing the \$0.864 million value.

(d) Please provide the detailed basis, including any documents or studies supporting each such assumption, for each assumption identified in the response to subpart (c) of this data request.

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- (e) To the extent not provided in response to subpart (d) of this data request, please identify and provide each source for the values used in computing the \$0.864 million value.
- (f) Please provide Mr. Kollen's basis for using the Company's weighted cost of capital in calculating the interest claimed due, including, but not limited to, all statutes, regulations, and orders of the Public Service Commission of Kentucky relied upon by Mr. Kollen in doing so.

RESPONSE 19:

- a. See attachment "KIUC\_AG\_response\_to\_Staff\_1-1.xlsx" as provided in response to Staff 1-1. Specifically, see tab "Interest Calc".
- b. First, the amount that the KPCO allocation of fuel and purchase power costs to native load exceeded the KIUC allocation was computed on a monthly basis a monthly excess value was calculated as the difference between the KPCO allocation and EKPC methods. This is referred to on the table as "Excess Fuel Refund." A half month convention was used to accrue interest on the excess amounts that occurred between January 2014 and

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April 2014. Interest is accrued through December 2014 at which point refunds are assumed to be made. If the refund period extends beyond December 2014, interest would continue to run until the refund is completed.

- c. Kentucky Power's weighted average cost of capital is used in the interest calculation.
- d. See the responses to (a) – (c) above.
- e. See the responses to (a) – (c) above.
- f. The weighted cost of capital is the same rate of interest that customers pay the Company for its investments. In this case, the customers have advanced amounts to the Company based on erroneous FAC filings. This interest rate is appropriate for this ratemaking purpose, even though it does not fully compensate the average residential ratepayer in Eastern Kentucky who is likely carrying credit card debt or pay-day loans that could have been paid off or paid down had they not been overcharged for electric service. The interest rate on credit card debt or pay day loans is much higher than Kentucky Power's cost of capital.

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20. Please refer to the testimony of Mr. Kollen and the table at Page 14, line 1 and above:

- (a) Please provide all spreadsheets, work papers, calculations, and analyses, and all calculations relating to, consulted, or reviewed, that were performed, consulted or relied upon by Mr. Kollen to develop this table. The requested information should be provided by unit, on an hour by hour basis, and in an electronic format, with formulas intact and visible, and no pasted values.
- (b) Please describe in detail the computational steps, if any, used by Mr. Kollen in calculating the values appearing in the table.
- (c) Please identify any assumptions made by Mr. Kollen in developing this table.
- (d) Please provide the detailed basis, including any documents or studies supporting each such assumption, for each assumption identified in the response to subpart (c) of this data request.
- (e) To the extent not provided in response to subpart (d) of this data request, please identify and provide each source for the values appearing in the table.

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RESPONSE 20:

- a. Please see attached document "KIUC\_AG\_response\_to\_Staff\_1-7\_Att\_e.xlsx".
- b. The \$/MWh values were computed using the fuel cost (\$000) and MWh as the Company had allocated to native load customers and off-system sales.
- c. No assumptions were made.
- d. The data the Company provided in its response to Staff 1-29 was used to determine the \$/MWh values.
- e. See the responses to (a) – (d) above.

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21. Please refer to the statement beginning at Page 26, line 16 of Mr. Kollen's testimony where Mr. Kollen states: "If the other minimum segment fuel costs from Mitchell were included the projected rate increase would be even greater."

(a) Please identify each "minimum segment fuel cost" that was not included and Mr.

Kollen's basis for stating that the "minimum segment fuel cost" could or should be included.

(b) Please provide all calculations or other basis relied upon by Mr. Kollen in making the identified statement. The requested information should be provided by unit, on an hour by hour basis, and in an electronic format, with formulas intact and visible, and no pasted values.

(c) Please identify any assumptions made or relied upon by Mr. Kollen in reaching the conclusion made in the identified statement.

(d) Please provide the detailed basis, including any documents or studies supporting each such assumption, for each assumption identified in the response to subpart (c) of this data request.

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- (e) To the extent not provided in response to subpart (d) of this data request, please identify and provide each source for the values appearing in the table.

RESPONSE 21:

- a. Mr. Kollen's testimony related to calculations that the Company performed and supplied in its response to Staff DR 3-9 (see KPSC\_3\_9\_Attachment1.xls). The Company included Mitchell 50% No Load Costs in line 3a. Mr. Kollen's testimony indicated that the 12.81% rate impact calculation at line 13 would have been higher if the Company had included the remaining minimum segment fuel costs in line 3a instead of just no load minimum segment fuel costs. The basis for Mr. Kollen's statement is that minimum segment costs are not composed of no load costs alone.
- b. See response to (a) above.
- c. See response to (a) above.
- d. See response to (a) above.

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e. See response to (a) above.

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22. To the extent not previously provided, please provide a copy of any documents, including regulatory orders where Kentucky Power was not a party, Mr. Kollen relied upon or otherwise consulted in developing his testimony. In lieu of a hard copy of a document it is acceptable to provide a live, working, and tested link to the specific document.

RESPONSE 22:

Mr. Kollen provided references to all documents relied on in his testimony. In addition, see also the responses to other Items in this Set for any other documents relied on.

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23. Please identify and produce any exhibits, demonstrative aids, or summaries (as the term is used at Kentucky Rule of Evidence 1006) that the Attorney General or Kentucky Industrial Utility Customers, Inc. intend to introduce or use during the course of the hearing in this matter. This is a continuing request and the response should be promptly supplemented.

- (a) For each such exhibit, demonstrative aid, or summary summaries (as the term is used at Kentucky Rule of Evidence 1006) please identify the source of all information therein
- (b) To the extent the source is not part of the record of this proceeding please provide a copy of the document or source.
- (c) To the extent the source is part of the record of this proceeding please identify where in the record the information may be found by data request response number, witness, page and line of testimony, or otherwise.

RESPONSE 23:

- a. Decisions on what, if any, cross exam or direct exam exhibits will be introduced at hearing will not be made until the hearing. Depending on witness responses to

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questioning by counsel during the hearing, no such exhibits may be introduced.

Furthermore, the Kentucky Rules of Evidence do not apply to Commission proceedings.

- b. See response to (a) above.
- c. See response to (a)bove.