

**COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION**

In the Matter of:

**APPLICATION OF KENTUCKY POWER)
COMPANY FOR (1) RE-AUTHORIZATION OF)
CERTAIN OF ITS EXISTING PROGRAMS;)
(2) AUTHORITY TO DISCONTINUE THE)
COMMERCIAL AND RESIDENTIAL HVAC)
DIAGNOSTIC AND TUNE-UP PROGRAMS;)
(3) AUTHORITY TO AMEND ITS DEMAND-)
SIDE MANAGEMENT PROGRAM TO)
IMPLEMENT RESIDENTIAL HOME)
PERFORMANCE AND RESIDENTIAL)
APPLICANCE RECYLCING PROGRAMS;)
(4) AUTHORITY TO RECOVER COSTS AND)
NET LOST REVENUES AND TO RECEIVE)
INCENTIVES ASSOCIATED WITH THE)
IMPLEMENTATION OF THE PROGRAMS;)
AND (5) ALL OTHER REQUIRED APPROVALS)
AND RELIEF)**

CASE NO. 2014-00271

**BEVERLY MAY AND SIERRA CLUB’S SUPPLEMENTAL REQUESTS FOR
INFORMATION TO KENTUCKY POWER COMPANY**

Pursuant to the Kentucky Public Service Commission’s (“Commission”) September 10, 2014 Order (“September Order”), proposed Intervenor Beverly May and Sierra Club¹ propound the following requests for information on Kentucky Power Company’s (“KPC” or “the Company”) application in the above-captioned docket.

KPC shall answer these requests for information in the manner set forth in the September Order and by no later than the November 10, 2014 deadline set forth in the Appendix of the September Order. In addition to the undersigned, please produce the responses to the information requests contained herein in electronic format to:

¹ Alexander DeSha and Sierra Club filed a timely motion for leave to intervene in the above-captioned docket on September 15, 2014. On October 17, 2014, Alexander DeSha and Sierra Club filed an amended motion for leave to intervene for the sole purpose of substituting individual movant Beverly May for Alexander DeSha. References to “Sierra Club” in this supplemental discovery request refer to proposed Intervenor Beverly May and Sierra Club.

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Wherever the response to a request for information consists of a statement that the requested information is already available to Sierra Club, provide a detailed citation to the document that contains the information. This citation shall include the title of the document, relevant page number(s), and to the extent possible paragraph number(s) and/or chart/table/figure number(s).

In the event that any document referred to in response to any request for information has been destroyed, specify the date and the manner of such destruction, the reason for such destruction, the person authorizing the destruction and the custodian of the document at the time of its destruction.

All documents should be produced in electronic, text-searchable format, and all workbooks should be provided in excel format, where available.

Sierra Club reserves the right to serve supplemental, revised, or additional discovery requests as permitted in this proceeding.

DEFINITIONS

Unless otherwise specified in each individual request, “you,” “your,” “KPC,” or “Company” refers to Kentucky Power Company, and its affiliates, employees, and authorized agents.

“And” and “or” shall be construed either conjunctively or disjunctively as required by the context to bring within the scope of these requests for information and for the production of documents any information that might be deemed outside their scope by another construction.

“Any” means all examples or each and every example of the requested information.

“Communication” means any transmission or exchange of information between two or more persons, whether orally or in writing, and includes, without limitation, any conversation or discussion by means of letter, telephone, note, memorandum, telegraph, telex, telecopy, cable, email, or any other electronic or other medium.

“Document” refers to written matter of any kind, regardless of its form, and to information recorded on any storage medium, whether in electrical, optical or electromagnetic form, and capable of reduction to writing by the use of computer hardware and software, and includes all copies, drafts, proofs, both originals and copies either (1) in the possession, custody or control of the Company regardless of where located, or (2) produced or generated by, known to or seen by the Company, but now in its possession, custody or control, regardless of where located whether or still in existence.

Such “documents” shall include, but are not limited to, applications, monitoring reports, computer printouts, contracts, leases, agreements, papers, photographs, tape recordings, transcripts, letters or other forms of correspondence, folders or similar containers, programs, telex, TWX and other teletype communications, memoranda, reports, studies, summaries, minutes, minute books, circulars, notes (whether typewritten, handwritten or otherwise), agenda, bulletins, notices, announcements, instructions, charts, tables, manuals, brochures, magazines, pamphlets, lists, logs, telegrams, drawings, sketches, plans, specifications, diagrams, drafts, books and records, formal records, notebooks, diaries, registers, analyses, projections, email correspondence or communications and other data compilations from which information can be obtained (including matter used in data processing) or translated, and any other printed, written, recorded, stenographic, computer-generated, computer-stored, or electronically stored matter, however and by whomever produced, prepared, reproduced, disseminated or made.

Without limitation, the term “control” as used in the preceding paragraphs means that a document is deemed to be in your control if you have the right to secure the document or a copy thereof from another person or public or private entity having actual possession thereof. If a document is responsive to a request, but is not in your possession or custody, identify the person with possession or custody. If any document was in your possession or subject to your control, and is no longer, state what disposition was made of it, by whom, the date on which such disposition was made, and why such disposition was made.

For purposes of the production of “documents,” the term shall include copies of all documents being produced, to the extent the copies are not identical to the original, thus requiring the production of copies that contain any markings, additions or deletions that make them different in any way from the original.

“DSM” means demand-side management, including energy efficiency/conservation and load management programs.

“Identify” means:

- (a) With respect to a person, to state the person’s name, address and business relationship to KPC (*e.g.*, “employee”);
- (b) With respect to a document, to state the nature of the document in sufficient detail for identification in a request for production, its date, its author, and to identify its custodian. If the information or document identified is recorded in electrical, optical or electromagnetic form, identification includes a description of the computer hardware or software required to reduce it to readable form.

“Workpapers” means original, electronic, machine-readable, unlocked, Excel format (where possible) with formulas intact.

PRIVILEGE

If you claim a privilege or protection including, but not limited to, the attorney-client privilege or the work product doctrine, as grounds for not fully and completely responding to any request for information, interrogatory or request for production, describe the basis for your claim of privilege in sufficient detail so as to permit Sierra Club or the Commission to evaluate the validity of the claim. With respect to documents for which a privilege is claimed, produce a “privilege log” that identifies the author, recipient, date and subject matter of the documents or response for which you are asserting a claim of privilege and any other information pertinent to the claim that would enable Sierra Club or the Commission to evaluate the validity of such claims.

REQUESTS FOR INFORMATION

2.1. Referring to KPC’s response to Sierra Club discovery request no. 1.6:

- a. Please explain why the Company responded to the request for “projected energy savings ... as a percentage of retail sales” for 2015 by providing forecast energy savings as a percentage of “2015 **residential and commercial** forecast retail sales.”
- b. Please provide the projected energy savings for 2015 as a percentage of the combined residential, commercial **and industrial** retail sales.
- c. Please provide a comparison of projected energy savings for 2015 and the Company’s actual and projected savings, as applicable, in 2013 and 2014, expressed in terms of:

- (i) megawatt hours; (ii) percentage of residential and commercial retails sales; and (iii) percentage of residential, commercial and industrial retails sales.

- 2.2. Referring to KPC's response to Sierra Club discovery request no. 1.19:
 - a. Please provide a description of the "LoadMAP Model" and explain its role in the development of the potential study and Final EE Portfolio.
 - b. Please explain what the "Final EE Portfolio" represents and state whether it will form the basis of the Company's next DSM filing.
 - c. Please state whether the "Final Presentation and Report" include the market potential study and Final EE Portfolio. If not, please state what it includes.
- 2.3. Please describe the methods the Company currently uses to identify potential new measures or program modifications, in addition to the AEG evaluation. Please also state whether a process exists through which program implementers can suggest new program ideas to the Company.
- 2.4. In its response to Commission Staff discovery request no. 1.7, the Company states "[l]ighting products will continue to utilize an upstream incentive processing (price mark-down) methodology. Appliance products will utilize a downstream incentive processing methodology whereas the customer will receive the rebate." Please state whether the Company has considered utilizing an upstream incentive proceeding methodology for appliance products and explain why it has opted to utilize a downstream method.

Dated: October 27, 2014

Respectfully submitted,



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CERTIFICATE OF SERVICE

I certify that a copy of the foregoing Supplemental Requests for Information to Kentucky Power Company has been served via U.S. mail and electronic mail on October 27, 2014 to the following:

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