

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

In the Matter of:

The Application of Kentucky Power Company for: )  
(1) A General Adjustment of Its Rates for Electric )  
Service; (2) An Order Approving Its 2014 ) Case No. 2014-00396  
Environmental Compliance Plan; (3) An Order )  
Approving Its Tariffs and Riders; and (4) An Order )  
Granting All Other Required Approvals and Relief )

**KENTUCKY POWER COMPANY'S DATA REQUESTS TO  
KENTUCKY SCHOOL BOARDS ASSOCIATION.**

\* \* \* \* \*

Pursuant to the Commission's Order dated January 13, 2015, Kentucky Power Company propounds the following data requests to be answered by the Kentucky School Boards

Association:

**DEFINITIONS**

1. "Document" means the original and all copies (regardless of origin and whether or not including additional writing thereon or attached thereto) of memoranda, reports, books, manuals, instructions, directives, records, forms, notes, letters, notices, confirmations, telegrams, pamphlets, notations of any sort concerning conversations, telephone calls, meetings or other communications, bulletins, transcripts, diaries, analyses, summaries, correspondence investigations, questionnaires, surveys, worksheets, and all drafts, preliminary versions, alterations, modifications, revisions, changes, amendments and written comments concerning the foregoing, in whatever form, stored or contained in or on whatever medium, including computerized memory or magnetic media.
2. "Study" means any written, recorded, transcribed, taped, filmed, or graphic matter, however produced or reproduced, either formally or informally, a particular issue or situation, in whatever detail, whether or not the consideration of the issue or situation is in a preliminary stage, and whether or not the consideration was discontinued prior to completion.
3. "Person" means any natural person, corporation, professional corporation, partnership, association, joint venture, proprietorship, firm, or the other business enterprise or legal entity.

4. A request to identify a natural person means to state his or her full name and residence address, his or her present last known position and business affiliation at the time in question.
5. A request to identify a document means to state the date or dates, author or originator, subject matter, all addressees and recipients, type of document (e.g., letter, memorandum, telegram, chart, etc.), number of code number thereof or other means of identifying it, and its present location and custodian. If any such document was, but is no longer in the KSBA's possession or subject to its control, state what disposition was made of it.
6. A request to identify a person other than a natural person means to state its full name, the address of its principal office, and the type of entity.
7. "Identify" used in a fashion other than as described in instructions 3-6 above means to provide in detail, including all assumptions, bases, facts considered, and rationale if not called for in another part of the data request, the requested information.
8. "And" and "or" should be considered to be both conjunctive and disjunctive, unless specifically stated otherwise.
9. "Each" and "any" should be considered to be both singular and plural, unless specifically stated otherwise.
10. Words in the past tense should be considered to include the present, and words in the present tense include the past, unless specifically stated otherwise.
11. "You" or "your" means the person whose filed testimony is the subject of these interrogatories and, to the extent relevant and necessary to provide full and complete answers to any request, "you" or "your" may be deemed to include any person with information relevant to any interrogatory who is or was employed by or otherwise associated with the witness or who assisted, in any way, in the preparation of the witness' testimony.
12. "KSBA" means the Kentucky School Boards Association, its employees, and agents.
13. "PJM" means PJM Interconnection.
14. "Company" means Kentucky Power Company.
15. "AEP" means American Electric Power Company, Inc.

### INSTRUCTIONS

1. If any matter is evidenced by, referenced to, reflected by, represented by, or recorded in any document, please identify and produce for discovery and inspection each such document.

2. These interrogatories are continuing in nature, and, without regard to the date created or obtained, information which the responding party later becomes aware of, or has access to, and which is responsive to any request is to be made available to Kentucky Power. Any studies, evaluations, analyses, documents, or other subject matter not yet completed that will be relied upon during the course of this case should be so identified and provided as soon as they are completed. The Respondent is obliged to change, supplement and correct all answers to interrogatories to conform to available information, including such information as it first becomes available to the Respondent after the answers hereto are served.
3. Unless otherwise expressly provided, each interrogatory should be construed independently and not with reference to any other interrogatory herein for purpose of limitation.
4. The answers provided should first restate the question asked and also identify the person(s) supplying the information.
5. Please answer each designated part of each information request separately. If you do not have complete information with respect to any interrogatory, so state and give as much information as you do have with respect to the matter inquired about, and identify each person whom you believe may have additional information with respect thereto.
6. In the case of multiple witnesses, each interrogatory should be considered to apply to each witness who will testify to the information requested. Where copies of testimony, transcripts or depositions are requested, each witness should respond individually to the information request.
7. The interrogatories are to be answered under oath by the witness(es) responsible for the answer.
8. Please furnish any non-disclosure or other required for disclosure of any information or response for which confidential treatment provided.

#### Data Requests

1. Please provide all schedules, tables, and charts included in the testimony and exhibits to the testimony of Mr. Willhite in electronic format, with formulas intact and visible, and no pasted values.
2. Please provide all workpapers, source documents, and electronic spreadsheets used in the development of the testimony of Mr. Willhite. The requested information should be provided in an electronic format, with formulas intact and visible, and no pasted values.
3. Please reference page 5, lines 12 through 14, of the testimony of Mr. Willhite. Please quantify the "significant emissions reductions and monetary savings" resulting from the School Energy Managers Program ("SEMP") that Mr. Willhite references.

4. Please provide separately by school districts in Kentucky Power's service territory the emission reductions and energy savings resulting from the SEMP. The requested information should be provided in an electronic format, with formulas intact and visible, and no pasted values.
5. Please reference page 8, line 25, of the testimony of Mr. Willhite and Kentucky Power's peak days as shown on page 401b of the Company's FERC Form 1 for the years 2009-2014.
  - a. Please identify which of the peak days on page 401b of the Company's FERC Form 1 for the years 2009-2014 were days where school was not in session and which districts were not in session.

For those days identified in response to part (a), please identify whether the school was closed for both students and teachers or if teachers and staff were present but students were not (i.e. an in-service day).

6. Please reference page 8, lines 34-41 of Mr. Willhite's testimony. Please provide a cost of service study for rate LGS and school accounts based upon Mr. Willhite's proposed "demand method that recognizes that KPC must capacity plan based on its expected winter peak."
  - a. The requested information should be provided in an electronic format, with formulas intact and visible, and no pasted values. Please identify and provide all assumptions and inputs relied upon in making the calculations.
  - b. Please provide copies of all source documents or other materials relied on by Mr. Willhite to support his contention that the "alternative method" referred to on line 39 of Mr. Willhite's would better conform with Mr. Stegall's criteria articulated at page thirteen of his testimony."
7. Please refer to pages 8-9 of Mr. Willhite's testimony and his discussion of proposed Tariff LGS-School.
  - a. Please provide a complete version of Mr. Willhite's proposed Tariff LGS-School, including all terms, conditions of service, and rates.
  - b. Please provide all calculations used in computing the rates contained in Mr. Willhite's proposed Tariff LGS-School. The requested information should be provided in an electronic format, with formulas intact and visible, and no pasted values. Please identify and provide all assumptions and inputs relied upon in making the calculations.
8. Please identify all electric utilities in the Commonwealth that currently provide service in accordance with terms, conditions of service, and rates similar to those contained in Mr. Willhite's proposed Tariff LGS-School.
9. Please assume the Commission approves Mr. Willhite's proposed Tariff LGS-School.

- a. Is it Mr. Willhite's understanding that customers taking service under the proposed Tariff LGS-School would, as a class, pay less than they would if Tariff LGS-School is not approved?
- b. Please provide the calculation of the effect on Kentucky Power's revenue requirement, as proposed by Kentucky Power in this case, if Mr. Willhite's Tariff LGS-School is approved and all members of KSBA taking service from Kentucky Power take service under the proposed Tariff LGS-School.
- c. To which tariff classes should the foregone revenues resulting from the assumed approval of Tariff LGS-School be allocated?

Respectfully submitted,



Mark R. Overstreet  
R. Benjamin Crittenden  
STITES & HARBISON PLLC  
421 West Main Street  
P.O. Box 634  
Frankfort, Kentucky 40602-0634  
Telephone: (502) 223-3477  
Facsimile: (502) 223-4124  
[moverstreet@stites.com](mailto:moverstreet@stites.com)  
[bcrittenden@stites.com](mailto:bcrittenden@stites.com)

Kenneth J. Gish, Jr.  
STITES & HARBISON PLLC  
250 West Main Street, Suite 2300  
Lexington, Kentucky 40507  
Telephone: (859) 226-2300  
Facsimile: (859) 253-9144  
[kgish@stites.com](mailto:kgish@stites.com)

COUNSEL FOR  
KENTUCKY POWER COMPANY

**Certificate of Service**

A copy of the foregoing was filed using the Public Service Commission of Kentucky's electronic filing service, which will send an e-mail message to:

Michael L. Kurtz  
Kurt J. Boehm  
Jody Kyler Cohn  
Boehm, Kurtz & Lowry  
36 East Seventh Street, Suite 1510  
Cincinnati, Ohio 45202  
[mkurtz@bkllawfirm.com](mailto:mkurtz@bkllawfirm.com)  
[kBoehm@bkllawfirm.com](mailto:kBoehm@bkllawfirm.com)  
[jkylercohn@bkllawfirm.com](mailto:jkylercohn@bkllawfirm.com)

Jennifer Black Hans  
Angela Goad  
Lawrence W. Cook  
Kentucky Attorney General's Office  
1024 Capital Center Drive, Suite 200  
Frankfort, Kentucky 40601-8204  
[jennifer.hans@ag.ky.gov](mailto:jennifer.hans@ag.ky.gov)  
[angela.goad@ag.ky.gov](mailto:angela.goad@ag.ky.gov)  
[larry.cook@ag.ky.gov](mailto:larry.cook@ag.ky.gov)

Don C. A. Parker  
Spilman Thomas & Battle, PLLC  
300 Kanawha Blvd., East  
Charleston, WV 25301  
[dparker@spilmanlaw.com](mailto:dparker@spilmanlaw.com)

Derrick Price Williamson  
Carrie M. Harris  
Spilman Thomas & Battle, PLLC  
1100 Bent Creek Blvd., Suite 101  
Mechanicsburg, PA 17050  
[dwilliamson@spilmanlaw.com](mailto:dwilliamson@spilmanlaw.com)  
[charris@spilmanlaw.com](mailto:charris@spilmanlaw.com)

Matthew R. Malone  
William H. May, III  
Hurt, Crosbie & May PLLC  
127 West Main Street  
Lexington, Kentucky 40507  
[mmalone@hcm-law.com](mailto:mmalone@hcm-law.com)  
[bmay@hcm-law.com](mailto:bmay@hcm-law.com)

this the 6<sup>th</sup> day of April, 2015.



---

Mark R. Overstreet