

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

In the matter of: : CASE NO. 2014-00396

APPLICATION OF KENTUCKY POWER :  
COMPANY FOR: (1) A GENERAL :  
ADJUSTMENT OF ITS RATES FOR :  
ELECTRONIC SERVICE; (2) AN ORDER :  
APPROVING ITS 2014 ENVIRONMENTAL :  
COMPLILANCE PLAN; (3) AN ORDER :  
APPROVING ITS TARIFFS AND RIDERS; :  
AND (4) AN ORDER GRANTING ALL OTHER :  
REQUIRED APPROVALS AND RELIEF :

---

**KENTUCKY SCHOOL BOARDS ASSOCIATION’S FIRST REQUEST FOR  
INFORMATION**

---

The Kentucky School Boards Association (KSBA) intervener in this action, and in effort to comply with the procedural schedule established, respectfully requests the applicant, Kentucky Power Company, to respond to the First Request of Information in accordance with the Order of Procedure entered herein.

Additional Instructions

- A. Each request for information shall be accorded a separate answer on a separate piece of paper, and each subpart thereof shall be accorded a separate answer. Each request or subpart thereof shall be specifically admitted or denied, and information inquiries or subparts thereof should not be combined for the purpose of supplying a common answer.
- B. Restate the information inquiry immediately preceding each response.
- C. Identify the name, title, and business address of each person(s) providing each response and provide the data on which the response was created.

D. In answering these requests, utilize all information and documents that are available to you, including information in the possession of any of your agents, employees or attorneys, or otherwise subject to your custody or control.

E. If you object to any part of a request, answer all parts of such interrogatories or requests to which you do not object, and as to each part to which you do object, separately set forth the specific basis for the objection.

F. If you claim any form of privilege or other protection from disclosure as a ground for withholding information responsive to a request, please explain your claim with sufficient specificity to permit KSBA to make a full determination as to whether your claim is valid.

G. In each instance, the request shall be construed so as to require the most inclusive answer or production.

H. Please attach written material to any answer for which written material is requested and/or available. If such written material is not available, state where it may be obtained. Please label the written material with the number of the request to which it pertains.

#### Definitions

As used in these Requests for Information, the following terms have the meaning as set forth below:

1. "You" or "your" means Kentucky Power Company or the witness, as the context requires.

2. "List", "describe", "explain", "specify" or "state" shall mean to set forth fully, in detail, and unambiguously each and every fact of which Kentucky Power Company or its officers, employees, agents or representatives, have knowledge which is relevant to the answer called for by the request.

3. The terms "document" or "documents" as used herein shall have the same meaning and scope as in Rule 34 of the Kentucky Rules of Civil Procedure and shall include, without limitation, any writings and documentary material of any kind whatsoever, both originals and copies (regardless of origin and whether or not including additional writing thereon or attached thereto), and any and all drafts, preliminary versions, alterations, modifications, revisions, changes and written comments of and concerning such material, including but not limited to: correspondence, letters, memoranda, notes, reports, directions, studies, investigations, questionnaires and surveys, inspections, permits, citizen complaints, papers, files, books, manuals, instructions, records, pamphlets, forms, contracts, contract amendments or supplements, contract offers, tenders, acceptances, counteroffers or negotiating agreements, notices, confirmations, telegrams, communications sent or received, print-outs, diary entries, calendars, tables, compilations, tabulations, charts, graphs, maps, recommendations, ledgers, accounts, worksheets, photographs, tape recordings, movie pictures, videotapes, transcripts, logs, work papers, minutes, summaries, notations and records of any sort (printed, recorded or otherwise) of any oral communication whether sent or received or neither, and other written records or recordings, in whatever form, stored or contained in or on whatever medium including computerized or digital memory or magnetic media that:

- (a) are now or were formerly in your possession, custody or control; or
- (b) are known or believed to be responsive to these requests, regardless of who has or formerly had custody, possession or control.

4. The terms "identify" and "identity" when used with respect to an entity mean to state its full name and the address of its principal place of business.

5. The term to "state the basis" for an allegation, contention, conclusion, position or answer means (a) to identify and specify the sources therefore, and (b) to identify and specify all facts on which you rely or intend to rely in support of the allegation, contention, conclusion, position or answer, and (c) to set forth and explain the nature and application to the relevant facts of all pertinent legal theories upon which you rely for your knowledge, information and/or belief that there are good grounds to support such allegation, contention, conclusion, position or answer.

6. The terms "and" and "or" have both conjunctive and disjunctive meanings as necessary to bring within the scope of the request any information or documents that might otherwise be construed to be outside their scope; "all" and "any" mean both "each" and "every".

7. The terms "relates to" or "relating to" mean referring to, concerning, responding to, containing, regarding, discussing, describing, reflecting, analyzing, constituting, disclosing, embodying, defining, stating, explaining, summarizing, or in any way pertaining to.

8. The term "including" means "including, but not limited to."

9. The term "warranty company" means any company, individual, entity or other organization that engages in the business of providing or arranging for services on utility lines, including but not limited to gas, electric, water or sewer in a consumers home, apartment or other place of abode.

#### **FIRST REQUEST FOR INFORMATION OF KSBA**

1. Please provide copies all calculations, work papers and any other supporting documents including but not limited to load research reports used to develop the Allocation Factor Tables in Exhibit JMS-2.
2. Please provide copies of all available peak day load profiles for any school accounts recorded in the last five years.

3. Please provide a copy of all class loss factors used in the development of JMS-2 and any supporting studies and documentation.
4. Please provide load profiles for each monthly peak day as listed on the 2013 FERC Form 1 page 401b and as would be listed on that page for 2014.
5. Please provide a typical bill analysis for Rate Schedules MGS-sec, MGS-pri, LGS-sec and LGS-pri.
6. Please provide the average annual wage increase provided employees for the last ten years.
7. Please provide a copy of FERC Form 1 page 401b for the years 2004 – 2012.
8. Please provide the sales volume, number of customers and billing demands for each rate class for the years 2005 through 2014.
9. Please provide the 2014 monthly system sales volumes, peaks, dates and times in the same format as FERC Form 1 page 401b.
10. Referring to Section II – Application page 348 please provide for the period July 1, 2015 to June 30, 2016 expected revenues by base rates and for each surcharge or rider.
11. With reference to the Avera/McKenzie testimony at page 6 do the witnesses give the same weight to the peer group adjustment measures other than the FAC and ECA as they do the KPC's FCA and ECA or the Big Sandy Retirement and Unit 1 Riders? Please explain.

Respectfully submitted,

*Matt Malone*

---

Matthew R. Malone  
William H. May, III.  
Hurt, Crosbie & May PLLC  
127 West Main Street  
Lexington, Kentucky 40507  
(859) 254-0000 (office)  
(859) 254-4763 (facsimile)  
[mmalone@hcm-law.com](mailto:mmalone@hcm-law.com)  
[bmay@hcm-law.com](mailto:bmay@hcm-law.com)

Counsel for the Petitioner,  
**KENTUCKY SCHOOL BOARDS ASSOCIATION**

**CERTIFICATE OF SERVICE**

It is hereby certified, this the 29<sup>th</sup> day of January, 2015, that the attached First Request for Information of KSBA is a true and correct copy of the document being filed in paper medium; that the electronic filing has been transmitted to the Commission on January 29, 2015; that there are currently no parties that have been excused from participation by electronic service; that an original and one copy of this document is being mailed to the Commission for filing on January 29, 2015; and that an electronic notification of the electronic filing will be provided to all counsel listed on the Commission's service list in this proceeding.

*Matt Malone*

\_\_\_\_\_  
ATTORNEY FOR KSBA