

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

In the Matter of:

**Application of Kentucky Power Company For)
(1) Authority To Modify Certain Existing)
Demand-Side Management Programs; (2) Authority)
To Implement New Programs; (3) Authority To) Case No. 2015-00271
Discontinue Certain Existing Demand-Side Management)
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)**

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

Pursuant to the Kentucky Public Service Commission’s (“Commission”) September 24, 2015 Order (“September Order”), proposed Intervenor Beverly May and Sierra Club (collectively “Environmental Intervenor”) propound the following initial 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 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:

S. Laurie Williams
Sierra Club
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Washington, DC 20001
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Wherever the response to a request for information consists of a statement that the requested information is already available to the Environmental Intervenor, 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.

The Environmental Intervenors reserve 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 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 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 the Environmental Intervenors 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 the Environmental Intervenors or the Commission to evaluate the validity of such claims.

REQUESTS FOR INFORMATION

1. Referring to the Company's response to Sierra Club Initial Data Request Nos. 11 and 19, please explain the discrepancy between the 2016 savings estimates for the modified programs in these two data responses? Does this reflect the difference between net and gross estimates?
2. Referring to the Company's response to Sierra Club Initial Data Requests No. 11, please explain why the Company anticipates virtually no growth in incremental energy savings throughout the three-year planning period, i.e. annual savings range from 0.40-0.44% of retail sales.
3. Referring to the Company's response to Sierra Club Initial Data Request No. 20, please explain why the DSM surcharge "was designed for the commercial customer class only."
4. Referring to the Company's response to Sierra Club Initial Data Request No. 21:
 - a. Please describe all efforts the Company has undertaken to determine "industrial customers' interest in Company-sponsored DSM programs" and provide all supporting documentation.
 - b. Is it the Company's position that industrial customers would never be interested in a voluntary DSM program? Please explain.
 - c. Please describe how, in the Company's view, an industrial customer would "demonstrate an interest in participating in, or having the Company establish pursuant to KRS 278.285, industrial DSM programs."
5. Refer to the Company's response to Staff's Initial Data Request No. 1(b), in which the Company states that the Commercial Prescriptive Custom and New Construction programs are "readily adaptable for industrial customers." Given this statement, please explain why these programs are not available to industrial customers and builders, i.e. why has the Company not adapted these programs for industrial customers.
6. Referring to the Company's response to Staff's Initial Data Request No. 1(c), please state whether the Company has considered implementing any Time of Use trials. If yes, please describe.
7. Referring to the Company's response to Staff's Initial Data Request No. 9(c), please describe the aspects of "historical program performance" that led the Company to estimate that the high scenario budget amount is required to produce the mid scenario participation rate. Please also describe what, if any, steps the Company is taking to move towards budget-participation level parity (i.e. medium scenario budget, medium scenario participation) according to the Company's estimates.

8. Referring to the Company's response to Staff's Initial Data Request No. 21, please provide the discount rate KPC uses in deriving TRC test results.
9. Referring to the Company's response to Staff's Initial Data Request No. 30:
 - a. Given that KPC has not offered DSM programs to its industrial customers since December 31, 1998 and it believes that some of its current commercial programs are "readily adaptable for industrial customers," would the Company be open to offering its Commercial Perspective and New Construction programs, for example, to industrial customers?
 - b. Refer to the paragraph beginning "This case is the final installment..." Is it the Company's position that it has not offered industrial programs because of its DSM spending obligations set forth the Stipulation and Agreement in Case No. 2012-00578?

Date: 11/24/2015

Respectfully submitted,



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Of counsel:

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CERTIFICATE OF SERVICE

I certify that a copy of Beverly May and Sierra Club's Statement of Waiver and E-Mail Service Notification has been served via U.S. mail and/or electronic mail on November 24, 2015 to the following:

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