

**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)	CASE NO. 2015-00271
TO IMPLEMENT NEW PROGRAMS; (3))	
AUTHORITY TO 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 INITIAL 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 November 11, 2015 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:

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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 Intervenors, 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. Please provide all KPC responses to requests for information from all parties and Commission Staff in this proceeding.
2. Referring to the Application at 3 and Exhibit 2, please provide updated year-to-date energy and demand savings estimates for 2015, expressed in both kilowatt hours and as a percentage of retail sales. Please also provide updated projected estimates for the entire 2015 year, if available.
3. Referring to the Application at 3 and Exhibit 2, please provide updated year-to-date total DSM/EE costs for 2015, including total program costs, incentive payments and realized lost revenues and indicating the costs of each of these three categories. Please also provide updated projected estimates for the entire 2015 year, if available.
4. Please state whether the Company expects to meet its DSM spending requirement for 2015, as outlined in the Stipulation and Agreement in Case No. 2012-00578.
5. Referring to the Application at 3, please define the term “realized lost revenues” as it is used in paragraph 5. Please also explain how these lost revenues are calculated.
6. In determining whether it has met its DSM/EE spending obligation as outlined in the Stipulation and Agreement in Case No. 2012-00578, please state whether and how KPC accounts for realized lost revenues (e.g., are realized lost revenues included in the DSM/EE spending estimate?).
7. Referring to the Application at 3, please explain why the word “avoided” appears in quotation marks in paragraph 4.

8. Referring to the Application at 3, KPC first presents 2015 year-to-date energy and demand savings estimates without avoided transmission and distribution line losses, and then provides the estimates accounting for these avoided costs in parenthesis. Please explain why the Company presents these savings estimates without avoided transmission and distribution line losses.
9. Regarding the T&D loss savings factor referenced in Exhibit 2 of the Application (pages 1 and 30 of 63):
 - a. Please provide the basis for using a 9% T&D loss savings factor when computing annual net energy savings.
 - b. Please provide the basis for using a 10% T&D loss savings factor when computing peak demand reductions.
 - c. Please describe how these T&D loss savings are computed as a part of total annual energy savings.
10. Regarding the savings and lost revenue calculations discussed in Exhibit 2 of the Application (pages 1 and 30 of 63):
 - a. Please provide the referenced Sunset Provision.
 - b. Please explain the term “initial values” as it is used in the following sentence on p. 30 of 63: “The individual DSM lost revenue, efficiency incentive and maximizing incentives as of June 30, 1997 are calculated based on the initial values from Exhibit E in the joint application, filed September 27, 1995.”
 - c. Please provide the Exhibit E referenced in the sentence quoted above in subpart (b).
11. Please provide the projected incremental energy savings for each of the years 2016 through 2018, expressed in both kilowatt hours and as a percentage of retail sales, for each program in KPC’s DSM plan and for the plan as a whole.
12. For each existing program that KPC proposes to continue (either in existing or modified form), please provide the energy savings projections for 2016 and 2017, expressed in both kilowatt hours and as a percentage of retail sales, that KPC made at the time it applied for approval in Case No. 2014-00271.
13. Please provide the projected incremental demand savings for each of the years 2016 through 2018, for each program in KPC’s DSM plan and for the plan as a whole.
14. For each existing program that KPC proposes to continue (either in existing or modified form), please provide the demand savings projections for 2016 and 2017 that KPC made at the time it applied for approval in Case No. 2014-00271.
15. Please provide the provide the participant forecast for each program the Company proposes to offer (both existing/modified and new) for each of the years 2016 through

2018, for each program in KPC's DSM plan and for the plan as a whole.

16. For existing programs that KPC proposes to continue (either in existing or modified form), please provide the participant forecast for each of the years 2016 and 2017 that KPC made at the time it applied for approval in Case No. 2014-00271.
17. Please explain how the Company plans to evaluate the School Energy Manager Program and what criteria will be used.
18. For each of the Companies' existing DSM programs that it seeks to continue (either in existing or modified form), please provide the Companies' most recent EM&V report or assessment.
19. For each of the following programs, please provide the expected change in demand and energy savings for each program from 2015 to 2016:
 - a. Residential Efficient Products
 - b. Appliance Recycling Program
 - c. Targeted Energy Efficiency Program
 - d. Energy Education for Students
 - e. Community Outreach CFL Program
20. Referring to the Application at page 14, please explain why the New Construction Program is not available to industrial customers and builders.
21. Please explain what, if any, DSM programs would be available to KPC's industrial customers if the Company's proposed plan is approved. If none, please explain why.
22. Referring to the Direct Testimony of Mr. Rogness at page 15, lines 10-13, please state whether it is Mr. Rogness's belief that the existence of the industrial opt out means that it is unrealistic to expect any industrial customer participation in DSM/EE programs. If this is not Mr. Rogness's belief, please explain what this portion of the testimony suggests in terms of industrial customer participation.
23. Referring to the Direct Testimony of Mr. Rogness at page 16, lines 14-9, does the "robust customer participation levels" referenced in the testimony reflect the participation levels in AEG's High Scenario customer participation level. If not, please explain what the term represents.

Date: 10/28/2015

Respectfully submitted,



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