COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

Electronic Application of Kentucky Power Company For (1) A General Adjustment of Its Rates for Electric Service; (2) An Order Approving its 2017 Environmental Compliance Plan; (3) An Order Approving Its Tariffs And Riders; (4) An Order Approving Accounting Practices to Establish a Regulatory Asset or Liability Related to the Big Sandy 1 Operation Rider; and (5) An Order Granting All Other Required Approvals and Relief

CASE NO: 2017-00179

COMMUNITY ACTION KENTUCKY, INC.‘S INITIAL REQUESTS FOR INFORMATION TO KENTUCKY POWER COMPANY

* * * * *

Comes Community Action Kentucky, Inc. (CAK), by counsel, and submits its Initial Requests for Information to Kentucky Power Company.

GENERAL INSTRUCTIONS

(1) Please identify the company witness or witnesses who will be prepared to answer questions concerning each request.

(2) If any request appears confusing, please request clarification directly from the undersigned.

(3) To the extent that the specific document, work paper, or information as requested does not exist, but a similar document, work paper, or information does exist, provide the similar document, work paper, or information.

(4) For any document withheld on the basis of privilege, state the following: date; author; addressee; indicated or blind copies; all persons to whom distributed, shown, or explained; and the nature of and legal basis of the privilege.

(5) To the extent that a request calls for information not available for all categories or all periods of time for which the information is sought, please explain why the information is not available, and answer the request for the time or categories for which it is available.

1
REQUESTS FOR INFORMATION

(1) Please list the counties in which Kentucky Power Company operates and the current number of residential customers in each. If possible, provide this data in the form of an Excel spreadsheet.

(2) Please list the Zip Codes in which Kentucky Power Company operates and the current number of residential customers in each. If possible, provide this data in the form of an Excel spreadsheet.

(3) (a) Please provide the number of Kentucky Power Company residential customers who made at least one late payment in each of the years 2017, 2016, 2015, 2014, and 2013.

(b) Please additionally provide the information requested in (a) for each county in which Kentucky Power Company operates. If possible, provide this data in the form of an Excel spreadsheet.

(c) Please additionally provide the information requested in (a) for each zip code in which Kentucky Power Company operates. If possible, provide this data in the form of an Excel spreadsheet.

(4) (a) How many Kentucky Power Company’s residential accounts were shut off for nonpayment in each year 2013, 2014, 2015, 2016, and 2017?

(b) Of the accounts in the answer above, how many of those were shut off more than once for non-payment?

(5) (a) How many Kentucky Power Company residential accounts were shut off for nonpayment in each year 2013, 2014, 2015, 2016, and 2017 in each county in which Kentucky Power Company operates? If possible, provide this data in the form of an Excel spreadsheet.
(b) How many Kentucky Power Company residential accounts were shut off for non-payment in each year 2013, 2014, 2015, 2016, and 2017 in each zip code in which Kentucky Power Company operates?

(6) Please provide the average monthly bill amount (in dollars, not usage) for Kentucky Power Company residential customers (as a whole) each year 2012, 2013, 2014, 2015, and 2016.

(7) How many Kentucky Power Company customers paid a reconnect fee in the past 12 months?

(8) Please provide the average Kentucky Power Company residential bill amount (in dollars, not usage) for each of the past 12 months.


(10) (a) How many Kentucky Power Company residential customers received disconnect notices in each year 2013, 2014, 2015, 2016, and 2017?

(b) How many Kentucky Power Company’s residential customers received disconnect notices in each of the years 2013, 2014, 2015, 2016, and 2017 in each county in which Kentucky Power Company operates?

(c) How many Kentucky Power Company residential customers received disconnect notices in each of the years 2013, 2014, 2015, 2016, and 2017 in each zip code in which Kentucky power Company operates?

(11) (a) How many Kentucky Power Company residential customers received bill paying assistance from a third party agency in each of the years 2013, 2014, 2015, 2016, and 2017.

(b) Please provide the number of residential customers by counties in the Kentucky Power Company service area who received bill paying assistance from a third party
agency, in each of the years 2013, 2014, 2015, 2016, and 2017. If possible, please provide this data in the form of an Excel spreadsheet.

(12) Please provide the average annual usage for Kentucky Power Company residential customers (as a whole) for each of the following years: 2013, 2014, 2015, 2016, and 2017.

(13) Please provide the average annual usage for Kentucky Power Company residential customers who received bill paying assistance from a third party agency (as a whole) in the years 2013, 2014, 2015, 2016, and 2017.

Respectfully submitted,

IRIS G. SKIDMORE
Bates and Skidmore
415 W. Main St., Suite 2
Frankfort, KY 40601
Telephone: (502)-352-2930
Facsimile: (502)-352-2931
Batesandskidmore@gmail.com

COUNSEL FOR CAK
CERTIFICATE OF SERVICE

I hereby certify that CAK’S August 14, 2017 electronic filing is a true and accurate copy of CAK’S Initial Requests for Information to Kentucky Power Company to be filed in paper medium; that the electronic filing has been transmitted to the Commission on August 14, 2017; that an original and six copies of the filing will be delivered to the Commission on August 14, 2017; that there are currently no parties excused from participation by electronic service; and that, on August 14, 2017, electronic mail notification of the electronic filing is provided to the following:

Elizabeth Sekula
American Electric Power Service Corporation
1 Riverside Plaza, 29th Floor
Post Office Box 16631
Columbus, Ohio 43216

Hector Garcia
American Electric Power Service Corporation
1 Riverside Plaza, 29th Floor
Post Office Box 16631
Columbus, Ohio 43216

Kentucky Power Company
855 Central Avenue, Suite 200
Ashland, KY 41101

Rebecca W. Goodman, Esq.
Office of the Attorney General
Office of Rate Intervention
700 Capital Avenue, Suite 20
Frankfort, Kentucky 40601-8204

Kent Chandler, Esq.
Office of the Attorney General
Office of Rate Intervention
700 Capital Avenue, Suite 20
Frankfort, Kentucky 40601-8204

Lawrence W. Cook, Esq.
Office of the Attorney General
Office of Rate Intervention
700 Capital Avenue, Suite 20
Frankfort, Kentucky 40601-8204

Justin M. McNeil
Office of the Attorney General
Office of Rate Intervention
700 Capital Avenue, Suite 20
300 Kanawha Blvd. East
Charleston, WV  25301

Gregory T. Dutton, Esq.
Goldberg Simpson LLC
9301 Dayflower Street
Louisville, KY  40059

James W. Gardner, Esq.
Sturgill, Turner, Barker & Maloney, PLLC
333 West Vine Street
Suite 1400
Lexington, KY  40507

M. Todd Osterloh, Esq.
Sturgill, Turner, Barker, & Maloney, PLLC
333 West Vine Street
Suite 1400
Lexington, KY  40507

Laurence J. Zielke, Esq.
Zielke Law Firm PLLC
1250 Meidinger Tower
462 South Fourth Avenue
Louisville, KY  40202

Mark E. Heath, Esq.
Spilman Thomas & Battle, PLLC
300 Kanawha Blvd., East
Charleston, WV  25301

Matthew R. Malone, Esq.
Hurt, Deckard & May
The Equus Building
127 Main Street
Lexington, KY  40507

Morgain Sprague, Esq.
Kentucky League of Cities
101 East Vine Street
Suite 800
Lexington, KY  40507

_________________________
Counsel for CAK