

Electronic Application Of Kentucky Power Company For A General Adjustment Of Its Rates
For Electric Service, Case No. 2017-00179
KLC Responses to Discovery Requests of Kentucky Power Co.

QUESTION NO. 1

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Please provide all schedules, tables, and charts included in the testimony and exhibits to the testimony of Mr. Pollock in electronic format, with formulas intact and visible, and no pasted values.

RESPONSE:

Mr. Pollock's workpapers to both his original and updated testimony are attached.

RESPONDING WITNESS: Jeff Pollock

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QUESTION NO. 2

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Please provide all workpapers, source documents, and electronic spreadsheets used in the development of the testimony of Mr. Pollock. The requested information, if so available, should be provided in an electronic format, with formulas intact and visible, and no pasted values.

RESPONSE:

Please see KLC's response to Question No. 1.

RESPONDING WITNESS: Jeff Pollock

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QUESTION NO. 3

Please provide a copy of KLC's bylaws, articles of incorporation, and any other documents that detail the organization's operations including, without limitation, any documents that describe KLC's authority to speak on behalf of any of its member municipalities.

RESPONSE:

See attached by-laws and articles of incorporation.

RESPONDING WITNESS: Robin Cooper

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QUESTION NO. 4

Please refer to page 1, lines 18-19, of the testimony of Mr. Cooper.

- a. Please identify which of the 29 cities referenced there are members of KLC.
- b. Please identify each municipality on whose behalf KLC is appearing in this proceeding.
- c. For each municipality upon whose behalf KLC is appearing in this action please provide a copy of the ordinance, resolution, or other official action authorizing KLC to appear in this action upon behalf of the city.
- d. For each city identified above, please confirm that each of the cities authorized KLC to take the positions set forth in the testimony of Mr. Pollock.
- e. For each city that has authorized KLC to take the positions set forth in the testimony of Mr. Pollock, please provide any written evidence that the city has authorized KLC to take the positions set forth in the testimony of Mr. Pollock.

RESPONSE:

- a. See paragraph 2 of the KLC Motion to Intervene for a list of member cities.
- b. See Response to a.
- c. No such action is necessary by the cities and KLC has no mechanism for tracking such action by member cities.
- d. See response to c.
- e. See response to c.

RESPONDING WITNESS: Robin Cooper

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QUESTION NO. 5

Please refer to page 1, line 23, and page 2, lines 1-2, of the testimony of Mr. Cooper.

- a. Please provide a copy of each correspondence from cities reviewed by Mr. Cooper.
- b. For each correspondence reviewed by Mr. Cooper, please confirm whether the author of the correspondence had the authority to speak on behalf of the city.
- c. For each correspondence reviewed by Mr. Cooper where the author had the authority to speak on behalf of the City, please provide all documents that support the author's authority to speak on behalf of the City.

REPSONSE:

- a. See attached emails from Cities of Louisa and Ashland.
- b. Mr. Cooper cannot verify the authority of the individuals to speak on behalf of their respective cities on this matter, but both the titles of the individuals and the content of the messages creates a strong presumption of authority. Mr. Vincent is the City Attorney for the City of Ashland, and Mr. Slone is the Mayor of the City of Louisa.
- c. See responses to a and b.

RESPONDING WITNESS: Robin Cooper

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QUESTION NO. 6

Please refer to page 3, lines 12-14, of the testimony of Mr. Cooper.

- a. Please identify which Paintsville city officials Mr. Cooper communicated with regarding the claimed confusion over calculation of electricity rates.
- b. Please provide a copy of all communications between Mr. Cooper and Paintsville city officials regarding the claimed confusion.
- c. Please identify any communications by Paintsville city officials and employees of Kentucky Power to address the claimed confusion.

RESPONSE:

- a. Mr. Cooper spoke with Mayor Bill Mack Runyon and Ms. Kim Blanton, CFO, regarding street lighting. Mr. Cooper spoke with Mr. Bob Pack, General manager of Paintsville Utilities, regarding utility rates generally.
- b. All communications was via phone call, no notes or written communications exist.
- c. Mr. Cooper is aware of communications between Paintsville and Kentucky Power but cannot speak to the specifics of those communications.

RESPONDING WITNESS: Robin Cooper

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QUESTION NO. 7

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Please refer to Exhibits JLP-1, JLP-2, and JLP-3 to the testimony of Mr. Pollock. Please confirm that the proposed revenue requirement increase for Kentucky Power utilized by Mr. Pollock is the proposed revenue requirement increase initially filed by Kentucky Power and not the updated and reduced proposed revenue requirement filed by Kentucky Power on August 7, 2017.

RESPONSE:

Confirmed as to Exhibits JP-1, JP-2 and JP-3.

RESPONDING WITNESS: Jeff Pollock

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QUESTION NO. 8

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Please confirm that the position advocated for by KLC would result in higher electricity rates for residential customers than those proposed by Kentucky Power.

RESPONSE:

Denied. KLC's is not advocating for an increase in rates for residential customers, or any customer, but merely for a move towards cost based rates. As explained in Mr. Pollock's testimony, Mr. Pollock used KPCO's proposed revenue requirements for illustrative purposes only and is not an endorsement of KPCO's proposals. Thus, neither Mr. Pollock nor KLC are supporting KPCO's proposed base revenue increase, including the increase in residential rates. As an alternative to KPCO's proposed class revenue allocation, Mr. Pollock is proposing to move rates closer to cost. The increase required to move rates closer to cost will depend on the base revenue increase authorized by the Commission.

RESPONDING WITNESS: Jeff Pollock