

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 PSC Staff

QUESTION NO. 1

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Refer to the Direct Testimony of Jeffry Pollock ("Pollock Testimony"), page 9.

- a. Explain whether the witness is aware that on August 8, 2017, Kentucky Power Company ("Kentucky Power") updated its application to reflect the results of its June 2017 refinancing.
- b. Provide updates to all testimony and exhibits to reflect the June 2017 refinancing.

RESPONSE:

- a. Mr. Pollock is aware that Kentucky Power updated its application.
- b. Updated testimony and exhibits were filed on October 25, 2017.

RESPONDING WITNESS: Jeff Pollock

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QUESTION NO. 2

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Refer to the Pollock Testimony. Provide all exhibits in Excel spreadsheet format with all formulas intact and unprotected and with all columns and rows accessible.

RESPONSE:

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

RESPONDING WITNESS: Jeff Pollock

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QUESTION NO. 3

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Refer to the Direct Testimony of Robin Cooper ("Cooper Testimony"), unnumbered pages 3- 4 , which state that the billing amount for street lighting in -2- Case No. 2017-00179 Paintsville, Kentucky, fluctuates monthly, although the outdoor lighting and street lighting tariffs provide for a flat fee.

- a. Explain whether Paintsville city officials have investigated the reason for the billing fluctuation and, if they have, what explanation was provided for the fluctuation.
- b. State whether the number of streetlights included in each bill remained the same or was different for the months in which Paintsville's street lighting billing amount fluctuated.
- c. Explain whether KLC is aware that the Fuel Adjustment Clause, System Sales Clause, Asset Transfer Rider, Big Sandy Retirement Rider, Big Sandy 1 Operation Rider, Purchase Power Adjustment, Environmental Surcharge, and Capacity Charge are included in the calculation of the monthly lighting bill.
- d. Explain whether KLC is aware that these riders can fluctuate month to month.

RESPONSE:

- a. Mr. Cooper is aware that Paintsville officials have communicated with Kentucky Power representatives regarding the fluctuations. The exact content of those conversations is unknown to Mr. Cooper.
- b. Mr. Coper is uncertain whether the number of streetlights remained consistent across the months discussed with the Paintsville officials. However, it is his belief that the number of street lights was consistent.
- c. KLC is aware that certain costs are included in the calculation of the monthly lighting bill. KLC was unaware that some of the listed riders were included into the lighting rates.
- d. KLC is aware that riders may fluctuate from month to month.

RESPONDING WITNESS: Robin Cooper