

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

In the matter of: : CASE NO. 2017-00179

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 :
REGULATORY ASSETS AND LIABILITIES; :
AND (5) AN ORDER GRANTING ALL OTHER :
REQUIRED APPROVALS AND RELIEF :

**KENTUCKY SCHOOL BOARDS ASSOCIATION’S
SUPPLEMENTAL REQUEST FOR INFORMATION**

The Kentucky School Boards Association (KSBA), by counsel, respectfully requests Kentucky Power Company, to respond to the Supplemental Request of Information in accordance with the Order of Procedure entered herein.

Additional Instructions

- A. Each request for information shall be accorded a separate answer on a separate piece of paper, and each subpart thereof shall be accorded a separate answer. Each request or subpart thereof shall be specifically admitted or denied, and information inquiries or subparts thereof should not be combined for the purpose of supplying a common answer.
- B. Restate the information inquiry immediately preceding each response.
- C. Identify the name, title, and business address of each person(s) providing each response and provide the data on which the response was created.

D. In answering these requests, utilize all information and documents that are available to you, including information in the possession of any of your agents, employees or attorneys, or otherwise subject to your custody or control.

E. If you object to any part of a request, answer all parts of such interrogatories or requests to which you do not object, and as to each part to which you do object, separately set forth the specific basis for the objection.

F. If you claim any form of privilege or other protection from disclosure as a ground for withholding information responsive to a request, please explain your claim with sufficient specificity to permit KSBA to make a full determination as to whether your claim is valid.

G. In each instance, the request shall be construed so as to require the most inclusive answer or production.

H. Please attach written material to any answer for which written material is requested and/or available. If such written material is not available, state where it may be obtained. Please label the written material with the number of the request to which it pertains.

Definitions

As used in these Requests for Information, the following terms have the meaning as set forth below:

1. "You" or "your" means Kentucky Power Company or the witness, as the context requires.

2. "List", "describe", "explain", "specify" or "state" shall mean to set forth fully, in detail, and unambiguously each and every fact of which Kentucky Power Company or its officers, employees, agents or representatives, have knowledge which is relevant to the answer called for by the request.

3. The terms "document" or "documents" as used herein shall have the same meaning and scope as in Rule 34 of the Kentucky Rules of Civil Procedure and shall include, without limitation, any writings and documentary material of any kind whatsoever, both originals and copies (regardless of origin and whether or not including additional writing thereon or attached thereto), and any and all drafts, preliminary versions, alterations, modifications, revisions, changes and written comments of and concerning such material, including but not limited to: correspondence, letters, memoranda, notes, reports, directions, studies, investigations, questionnaires and surveys, inspections, permits, citizen complaints, papers, files, books, manuals, instructions, records, pamphlets, forms, contracts, contract amendments or supplements, contract offers, tenders, acceptances, counteroffers or negotiating agreements, notices, confirmations, telegrams, communications sent or received, print-outs, diary entries, calendars, tables, compilations, tabulations, charts, graphs, maps, recommendations, ledgers, accounts, worksheets, photographs, tape recordings, movie pictures, videotapes, transcripts, logs, work papers, minutes, summaries, notations and records of any sort (printed, recorded or otherwise) of any oral communication whether sent or received or neither, and other written records or recordings, in whatever form, stored or contained in or on whatever medium including computerized or digital memory or magnetic media that:

- (a) are now or were formerly in your possession, custody or control; or
- (b) are known or believed to be responsive to these requests, regardless of who has or formerly had custody, possession or control.

4. The terms "identify" and "identity" when used with respect to an entity mean to state its full name and the address of its principal place of business.

5. The term to "state the basis" for an allegation, contention, conclusion, position or answer means (a) to identify and specify the sources therefore, and (b) to identify and specify all facts on which you rely or intend to rely in support of the allegation, contention, conclusion, position or answer, and (c) to set forth and explain the nature and application to the relevant facts of all pertinent legal theories upon which you rely for your knowledge, information and/or belief that there are good grounds to support such allegation, contention, conclusion, position or answer.

6. The terms "and" and "or" have both conjunctive and disjunctive meanings as necessary to bring within the scope of the request any information or documents that might otherwise be construed to be outside their scope; "all" and "any" mean both "each" and "every".

7. The terms "relates to" or "relating to" mean referring to, concerning, responding to, containing, regarding, discussing, describing, reflecting, analyzing, constituting, disclosing, embodying, defining, stating, explaining, summarizing, or in any way pertaining to.

8. The term "including" means "including, but not limited to."

SUPPLEMENTAL REQUEST FOR INFORMATION OF KSBA

1. With regard to the Company's Response to KSBA_1_002 and KPCO_R_KPSC_1_73_Attachment41_LGS_Sec please provide the following:
 - a. The source of the load data.
 - b. Number of accounts.
 - c. How the accounts represented were selected including any statistical analysis and justification.
 - d. Confirmation data is for Company accounts, not those of subsidiaries.
 - e. If the load data was collected as part of a load research program please provide the number of metered accounts and the period in which the data was collected. If otherwise collected please provide the number of metered accounts and the period in which the data was collected if other than the case test period.
 - f. Confirmation no K-12 school accounts are included in the load data. If not, please explain and provide the number and identification of those included.

2. With regard to the Company's Response to KSBA_1_009 and KIUC_1_005 KPCO_R_KIUC_1_5_Attachment1 Cap Res Margin please provide the following:

- a. A description of each acronym in the table (ex. UCAP, IDR, IRM, etc.).
 - b. Example calculation of the “Total KPCo Reserve Margin” in MW.
 - c. Confirmation that 16.6% is the Company’s planning reserve margin.
 - d. Confirmation that “Net Position” MW shown in table columns 20 and 21 are reserves in excess of the planning reserve margin.
 - e. Clarification as to why there are no columns labeled 13, 14 and 15 in the table. If hidden, please provide the missing column data.
 - f. Please reconcile Exhibit G-11 of the Company’s IRP filing in Case no. 2016-00413 with KPCO_R_KIUC_1_5_Attachment1 and explain any differences.
3. With regard to the Company’s Response to KSBA_1_011 and KSBA_1_012:
 - a. Has the Company considered modifying their online bill comparison spreadsheet to facilitate a twelve-month comparison similar to that provided by LGE-KU?
 - b. Is the Company proposing that customers call a Company representative each month to inquire if they have been minimum billed?
 - c. Why does the Company not separately list the Service, Demand (Standard and Minimum), Excess Reactive and Energy Charges on L.G.S. I.G.S. on customer bills?
 - d. Has the Company considered including a table on the bill that shows the individual rider billings? If not, please explain?
 - e. Has the Company considered including the contract capacity and minimum billed amount in the “Meter Details” table or elsewhere on page 2 of the proposed bill format? If not, please explain?
 - f. Please provide copies or site reference to other Kentucky jurisdictional company bill formats reviewed by the Company.
 4. With regard to the Company’s Response to KSBA_1_017 please provide the following:
 - a. Confirm the Company’s position that it is the Kentucky retail ratepayer’s responsibility to protect their interest by active participation before the FERC in matters such as the Rockport UPA whose resolution affects the Company’s retail cost of service. If not, please explain?
 - b. Please provide copies of the AEPGC Power Bill for each month of the case test period.
 5. Please provide monthly cooling and degree day data for 2010 through 2017.
 6. Please provide the monthly KPC FERC Form 1 page 401b data for January through August 2017.
 7. With regard to Section II Exhibit J:
 - a. Please confirm that there were no minimum kw billings during the test period for rates L.G.S. and PS. If not, please provide the metered demands.
 - b. Please explain how the amounts for the Purchase Power Adjustment, Big Sandy 1 Operations Rider – Energy, Big Sandy 1 Operations Rider – Demand and

Environmental Surcharge are being proposed to be rolled in to base energy and demand charges.

8. With regard the Witness Vaughan's residential weather adjustment please provide the calculations and executable EXCEL spreadsheet of the \$9,953,044 adjustment reflected on KPCO_R_KPSC_1_73_Attachment72_AEVWP2.
9. With regard the testimony of Witness Ross at page 8 please provide the following for the Big Sandy gas fired unit:
 - a. Property balance at 2/28/17.
 - b. Test year depreciation expense.
 - c. Test year property expense.
 - d. Test year operation expense.
 - e. Test maintenance expense
10. Please explain why the Company chose March 2016 through February 2017 as the test period for this proceeding.
11. With regard to the Testimony of Witness Osborne at page 7 please provide the test year costs for accelerating the demolition of Big Sandy Unit 2 to facilitate its redevelopment as an economic development site.

Respectfully submitted,

/s/Matt Malone

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CERTIFICATE OF SERVICE

It is hereby certified, this the 8th day of September, 2017, that the attached is a true and correct copy of the document being filed in paper medium; that the electronic filing has been transmitted to the Commission on September 8, 2017; that there are currently no parties that have been excused from participation by electronic service; that an original and six copies of this document are being mailed to the Commission on September 8, 2017; and that an electronic notification of the electronic filing will be provided to all counsel listed on the Commission's service list in this proceeding.

/s/Matt Malone

ATTORNEY FOR KSBA