

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	)	CASE No.
Plan; (3) An Order Approving Its Tariffs and	)	2017-00179
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	)	

**ATTORNEY GENERAL’S DATA REQUESTS TO  
KENTUCKY INDUSTRIAL UTILITY CUSTOMERS**

Comes now the intervenor, the Attorney General of the Commonwealth of Kentucky, by and through his Office of Rate Intervention, and submits these Data Requests to Kentucky Industrial Utility Customers [hereinafter “KIUC”] to be answered by the date specified in the Commission’s Order of Procedure, and in accord with the following:

- (1) In each case where a request seeks data provided in response to a staff request, reference to the appropriate request item will be deemed a satisfactory response.
- (2) Identify the witness who will be prepared to answer questions concerning each request.
- (3) Repeat the question to which each response is intended to refer. The Office of the Attorney General can provide counsel for KIUC with an electronic version of these questions, upon request.
- (4) These requests shall be deemed continuing so as to require further and supplemental responses if the company receives or generates additional information within the scope of these requests between the time of the response and the time of any hearing conducted hereon.

(5) Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association, be accompanied by a signed certification of the preparer or person supervising the preparation of the response on behalf of the entity that the response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

(6) If you believe any request appears confusing, request clarification directly from Counsel for the Office of Attorney General.

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

(8) To the extent that any request may be answered by way of a computer printout, identify each variable contained in the printout which would not be self-evident to a person not familiar with the printout.

(9) If the company has objections to any request on the grounds that the requested information is proprietary in nature, or for any other reason, notify the Office of the Attorney General as soon as possible.

(10) As used herein, the words "document" or "documents" are to be construed broadly and shall mean the original of the same (and all non-identical copies or drafts thereof) and if the original is not available, the best copy available. These terms shall include all information recorded in any written, graphic or other tangible form and shall include, without limiting the generality of the foregoing, all reports; memoranda; books or notebooks; written or recorded statements, interviews, affidavits and depositions; all letters or correspondence; telegrams, cables and telex messages; contracts, leases, insurance policies or other agreements; warnings

and caution/hazard notices or labels; mechanical and electronic recordings and all information so stored, or transcripts of such recordings; calendars, appointment books, schedules, agendas and diary entries; notes or memoranda of conversations (telephonic or otherwise), meetings or conferences; legal pleadings and transcripts of legal proceedings; maps, models, charts, diagrams, graphs and other demonstrative materials; financial statements, annual reports, balance sheets and other accounting records; quotations or offers; bulletins, newsletters, pamphlets, brochures and all other similar publications; summaries or compilations of data; deeds, titles, or other instruments of ownership; blueprints and specifications; manuals, guidelines, regulations, procedures, policies and instructional materials of any type; photographs or pictures, film, microfilm and microfiche; videotapes; articles; announcements and notices of any type; surveys, studies, evaluations, tests and all research and development (R&D) materials; newspaper clippings and press releases; time cards, employee schedules or rosters, and other payroll records; cancelled checks, invoices, bills and receipts; and writings of any kind and all other tangible things upon which any handwriting, typing, printing, drawings, representations, graphic matter, magnetic or electrical impulses, or other forms of communication are recorded or produced, including audio and video recordings, computer stored information (whether or not in printout form), computer-readable media or other electronically maintained or transmitted information regardless of the media or format in which they are stored, and all other rough drafts, revised drafts (including all handwritten notes or other marks on the same) and copies of documents as hereinbefore defined by whatever means made.

(11) 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 and legal basis for the privilege asserted.

(12) In the event any document called for has been destroyed or transferred beyond the control of the company, state: the identity of the person by whom it was destroyed or transferred, and the person authorizing the destruction or transfer; the time, place, and method of destruction or transfer; and, the reason(s) for its destruction or transfer. If destroyed or disposed of by operation of a retention policy, state the retention policy.

(13) Provide written responses, together with any and all exhibits pertaining thereto, in one or more bound volumes, separately indexed and tabbed by each response, in compliance with Kentucky Public Service Commission Regulations.

(14) “And” and “or” should be considered to be both conjunctive and disjunctive, unless specifically stated otherwise.

(15) “Each” and “any” should be considered to be both singular and plural, unless specifically stated otherwise.

Respectfully submitted,

ANDY BESHEAR  
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***Certificate of Service and Filing***

Counsel certifies that the foregoing is a true and accurate copy of the same document being filed in paper medium with the Commission within two business days; that the electronic filing has been transmitted to the Commission on October 17, 2017; that there are currently no parties that the Commission has excused from participation by electronic means in this proceeding.

This 17<sup>th</sup> day of October, 2017.



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Assistant Attorney General

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Application of Kentucky Power Co. for a General Adjustment of its Rates and Orders  
Approving: (a) Its 2017 Environmental Compliance Plan; (b) Tariffs and Riders; (c) Accounting  
Practices to Establish a Regulatory Asset or Liability Related to the Big Sandy 1 Operation  
Rider; and (d) All Other Required Approvals and Relief  
Case No. 2017-00179

Attorney General's Data Requests to Kentucky Industrial Utility Customers

1. Provide all workpapers and source documents supporting Stephen J. Baron's testimony, exhibits, tables, and figures. Provide the requested documents in electronic spreadsheet form with all links and formulas intact, source data used, and explain all assumptions and calculations used. To the extent the data requested is not available in the form requested, provide the information in the form that most closely matches what has been requested.
2. Refer to page 6 lines 25 – 29 of the Direct Testimony of Stephen J. Baron's testimony where he states "While I believe that alternative methodologies for production cost allocation that focus more extensively on the summer system peak, which drives the need for capacity on the KPCo system, the 12 CP study filed by the Company is appropriate in this case to assess the reasonableness of class rates, relative to the cost of providing service."
  - a. Provide a detailed explanation of why Mr. Baron believes the summer system peak drives the need for capacity on the KPCo system.
  - b. Provide all studies and analysis that support Mr. Baron's belief that the summer system peak drives the need for capacity on the KPCo system.
  - c. Provide all workpapers and source documents in electronic spreadsheet form with all links and formulas intact, source data used, and explain all assumptions and calculations used. To the extent the data requested is not available in the form requested, provide the information in the form that most closely matches what has been requested.
3. Refer to page 18 lines 3 – 5 of the direct testimony of Stephen J. Baron where he states "Again, at the end of this step, the rate increase to each rate class (other than Rate IGS) would continue to reflect the KPCo 5% subsidy reduction. Rate IGS would reflect a full elimination of its subsidy payments."
  - a. Provide a detailed explanation why Mr. Baron believes it is fair and appropriate to eliminate the entire subsidy to the IGS class while only reducing the subsidy by 5 percent for the remaining classes.
  - b. Explain if Mr. Baron conducted any bill impact analysis to the Residential class regarding his recommended revenue allocation approach.
  - c. If the response to (c) is affirmative, provide a copy of the bill impact analysis.
  - d. Provide all workpapers and source documents in electronic spreadsheet form with all links and formulas intact, source data used, and explain all assumptions and calculations used. To the extent the data requested is not available in the form requested, provide the information in the form that most closely matches what has been requested.