

**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	)	Case No. 2017-00179
Riders; (4) An Order Approving Accounting	)	
Practices To Establish Regulatory Assets Or	)	
Liabilities; And (5) An Order Granting All Other	)	
Required Approvals And Relief	)	

**KENTUCKY POWER COMPANY'S DATA REQUESTS TO  
KENTUCKY INDUSTRIAL UTILITY CUSTOMERS, INC.**

\* \* \* \* \*

Pursuant to the Commission's Order dated July 17, 2017, Kentucky Power Company propounds the following data requests to be answered by Kentucky Industrial Utility Customers, Inc.:

**DEFINITIONS**

1. "Document" means the original and all copies (regardless of origin and whether or not including additional writing thereon or attached thereto) of memoranda, reports, books, manuals, instructions, directives, records, forms, notes, letters, notices, confirmations, telegrams, pamphlets, notations of any sort concerning conversations, telephone calls, meetings or other communications, bulletins, transcripts, diaries, analyses, summaries, correspondence investigations, questionnaires, surveys, worksheets, and all drafts, preliminary versions, alterations, modifications, revisions, changes, amendments and written comments concerning the foregoing, in whatever form, stored or contained in or on whatever medium, including computerized memory or magnetic media.
2. "Study" means any written, recorded, transcribed, taped, filmed, or graphic matter, however produced or reproduced, either formally or informally, a particular issue or situation, in whatever detail, whether or not the consideration of the issue or situation is in a preliminary stage, and whether or not the consideration was discontinued prior to completion.
3. "Person" means any natural person, corporation, professional corporation, partnership, association, joint venture, proprietorship, firm, or the other business enterprise or legal entity.

4. A request to identify a natural person means to state his or her full name and residence address, his or her present last known position and business affiliation at the time in question.
5. A request to identify a document means to state the date or dates, author or originator, subject matter, all addressees and recipients, type of document (e.g., letter, memorandum, telegram, chart, etc.), number or code number thereof or other means of identifying it, and its present location and custodian. If any such document was, but is no longer in the KIUC's possession or subject to its control, state what disposition was made of it.
6. A request to identify a person other than a natural person means to state its full name, the address of its principal office, and the type of entity.
7. "Identify" used in a fashion other than as described in instructions 3-6 above means to provide in detail, including all assumptions, bases, facts considered, and rationale if not called for in another part of the data request, the requested information.
8. "And" and "or" should be considered to be both conjunctive and disjunctive, unless specifically stated otherwise.
9. "Each" and "any" should be considered to be both singular and plural, unless specifically stated otherwise.
10. Words in the past tense should be considered to include the present, and words in the present tense include the past, unless specifically stated otherwise.
11. "You" or "your" means the person whose filed testimony is the subject of these interrogatories and, to the extent relevant and necessary to provide full and complete answers to any request, "you" or "your" may be deemed to include any person with information relevant to any interrogatory who is or was employed by or otherwise associated with the witness or who assisted, in any way, in the preparation of the witness' testimony.
12. "KIUC" means Kentucky Industrial Utility Customers, Inc., its employees, agents, and its members identified in Paragraph 1 of its May 11, 2017 motion to intervene in this proceeding, Stephen J. Baron, Richard A. Baudino, Lane Kollen, Barry J. Kornstein, Brad Levi, and J. Kennedy and Associates, Inc.
13. "PJM" means PJM Interconnection.
14. "Company" means Kentucky Power Company.
15. "AEP" means American Electric Power Company, Inc.

## INSTRUCTIONS

1. If any matter is evidenced by, referenced to, reflected by, represented by, or recorded in any document, please identify and produce for discovery and inspection each such document.
2. These interrogatories are continuing in nature, and, without regard to the date created or obtained, information which the responding party later becomes aware of, or has access to, and which is responsive to any request is to be made available to Kentucky Power. Any studies, evaluations, analyses, documents, or other subject matter not yet completed that will be relied upon during the course of this case should be so identified and provided as soon as they are completed. The Respondent is obliged to change, supplement and correct all answers to interrogatories to conform to available information, including such information as it first becomes available to the Respondent after the answers hereto are served.
3. Unless otherwise expressly provided, each interrogatory should be construed independently and not with reference to any other interrogatory herein for purpose of limitation.
4. The answers provided should first restate the question asked and also identify the person(s) supplying the information.
5. Please answer each designated part of each information request separately. If you do not have complete information with respect to any interrogatory, so state and give as much information as you do have with respect to the matter inquired about, and identify each person whom you believe may have additional information with respect thereto.
6. In the case of multiple witnesses, each interrogatory should be considered to apply to each witness who will testify to the information requested. Where copies of testimony, transcripts or depositions are requested, each witness should respond individually to the information request.
7. The interrogatories are to be answered under oath by the witness(es) responsible for the answer.
8. Please furnish any non-disclosure or other required for disclosure of any information or response for which confidential treatment provided.

## DATA REQUESTS

1. Please provide all schedules, tables, and charts included in the testimony and exhibits to the testimony of Mr. Baron in electronic format, with formulas intact and visible, and no pasted values.
2. Please provide all workpapers, source documents, and electronic spreadsheets used in the development of the testimony of Mr. Baron. The requested information, if so available,

should be provided in an electronic format, with formulas intact and visible, and no pasted values.

3. To the extent not already provided, please provide all schedules, tables, and charts included in the testimony and exhibits to the testimony of Mr. Kollen in electronic format, with formulas intact and visible, and no pasted values.
4. To the extent not already provided, please provide all workpapers, source documents, and electronic spreadsheets used in the development of the testimony of Mr. Kollen. The requested information, if so available, should be provided in an electronic format, with formulas intact and visible, and no pasted values.
5. Please provide all schedules, tables, and charts included in the testimony and exhibits to the testimony of Mr. Baudino in electronic format, with formulas intact and visible, and no pasted values.
6. Please provide all workpapers, source documents, and electronic spreadsheets used in the development of the testimony of Mr. Baudino. The requested information, if so available, should be provided in an electronic format, with formulas intact and visible, and no pasted values.
7. Please provide all schedules, tables, and charts included in the testimony and exhibits to the testimony of Mr. Kornstein in electronic format, with formulas intact and visible, and no pasted values.
8. Please provide all workpapers, source documents, and electronic spreadsheets used in the development of the testimony of Mr. Kornstein. The requested information, if so available, should be provided in an electronic format, with formulas intact and visible, and no pasted values.
9. Please refer to page 3, lines 11-16, of the testimony of Mr. Levi. Please provide detailed information that supports the claim that the Catlettsburg refinery will have the highest energy rate of all of the Marathon refineries. This information should include the actual tariff sheets under which each of the other Marathon refineries take service and a spreadsheet calculation showing a bill calculation for each of the other Marathon refineries. The bill calculation should include, at a minimum, the energy charge (in \$/kWh), demand charge (in \$/kW) and all reactive demand charges for the billing months of March 2016 through February 2017. To the extent required, Kentucky Power will execute an appropriate non-disclosure agreement.
10. Please refer to page 4, lines 1-3, of the testimony of Mr. Levi in which Mr. Levi states, "Substantial increases to the Catlettsburg refinery's electric rates would therefore adversely impact that facility's production costs and could impact its utilization rates."
  - a. Please provide all facts that support the statement that increases to electric rates would adversely impact the refinery's production costs including, without limitation, the percentage of total production costs for that Catlettsburg refinery that is electricity cost.

- b. Please provide all facts that support the statement that increases to electric rates could impact its utilization rates including, without limitation, the production costs for each of the other Marathon refineries and the percentage of total production costs for each of the other Marathon refineries that is electricity cost.
11. Please refer to page 24, lines 211-17, of the testimony of Mr. Baron. Please identify from a ratemaking standpoint which requirements of state and federal laws are not addressed by the Company's "Special Terms and Conditions for taking service under Tariff I.G.S."
12. Please refer to page 29, lines 11-14, of the testimony of Mr. Kollen. Please provide all facts that support Mr. Kollen's assertion that, as a coal-fired plant, the mid-2031 planned retirement date of Big Sandy Unit 1 was "based, in large part, on the avoidance of costs necessary to comply with numerous environmental requirements applicable to coal-fired generation."
  - a. Without limitation, in answering this data request please provide for each individual "environmental requirement":
    - (i) a full citation to the statute, regulation, order or other legal requirement imposing the environmental requirement; and
    - (ii) all facts supporting Mr. Kollen's statement the mid-2031 planned retirement date was based on or otherwise required or influenced by the identified environmental requirement;
13. Please refer to page 32, lines 11-15, of the testimony of Mr. Kollen. Please provide a citation to all statutory or regulatory requirements, including orders, that a utility submit for Commission approval a "dismantling and site restoration plan" prior to dismantling a retired generation asset.
14. Please refer to page 33, lines 18-22, and page 34, lines 1-3, of the testimony of Mr. Kollen. Please confirm that the terminal net salvage costs of the natural gas fired Big Sandy Unit 1 would not be eligible for recovery through the Decommissioning Rider because it would not be considered a coal-related asset.
15. Please refer to page 35, lines 21-23, and Page 35, lines 1-6. Please confirm that the Company was unable to take a § 199 deduction on its federal tax returns from 2014 - 2016. The Company provided copies of its returns in its September 5, 2017 and September 6, 2017 supplemental responses to AG 1-115.
16. Please refer to page 45, lines 10-15, of the testimony of Mr. Kollen. Please provide all bases for Mr. Kollen's claim that his proposed use of 2.0% short term debt is consistent with the Company's actual use of short-term debt during the test year.

Respectfully submitted,



---

Mark R. Overstreet  
Katie M. Glass  
STITES & HARBISON PLLC  
421 West Main Street  
P. O. Box 634  
Frankfort, Kentucky 40602-0634  
Telephone: (502) 223-3477  
Facsimile: (502) 223-4124  
[moverstreet@stites.com](mailto:moverstreet@stites.com)  
[kglass@stites.com](mailto:kglass@stites.com)

Kenneth J. Gish, Jr.  
STITES & HARBISON PLLC  
250 West Main Street, Suite 2300  
Lexington, Kentucky 40507  
Telephone: (859) 226-2300  
Facsimile: (859) 253-9144  
[kgish@stites.com](mailto:kgish@stites.com)

COUNSEL FOR KENTUCKY POWER  
COMPANY