

**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  
THE KENTUCKY SCHOOL BOARDS ASSOCIATION**

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Pursuant to the Commission’s Order dated July 17, 2017, Kentucky Power Company propounds the following data requests to be answered by the Kentucky School Boards Association:

**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 of 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 KSBA'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. "KSBA" means the Kentucky School Boards Association, its employees, and its agents.
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.

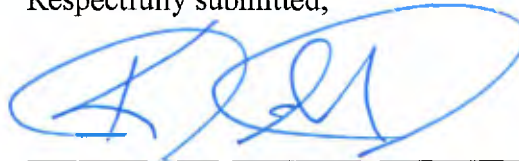
2. These interrogatories are continuing in nature, and, without regard to the date created or obtained, information which the responding party later becomes aware of, or has access to, and which is responsive to any request is to be made available to Kentucky Power. Any studies, evaluations, analyses, 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. Willhite in electronic format, with formulas intact and visible, and no pasted values.
2. Please refer to Exhibit RLW 1.
  - a. Please identify each school whose data was used in the calculation of the “PS” data points shown on the September 2016 graph and for each school so identified the school’s corresponding peak load.
  - b. Please identify each school whose data was used in the calculation of the “PS” data points shown on the January 2017 graph and for each school so identified the school’s corresponding peak load.

3. To the extent not provided in response to data request 2, please provide all workpapers, source documents, and electronic spreadsheets used in the development of the testimony of Mr. Willhite. The requested information, if so available, should be provided in an electronic format, with formulas intact and visible, and no pasted values
4. Please refer to page 3, lines 36-37, and page 4, lines 1-2, of the testimony of Mr. Willhite. Please confirm that customers receiving service under Pilot Tariff K-12 School were the recipients of a \$500,000 total annual subsidy from customers taking service under Tariff L.G.S.
  - a. Please confirm that referenced rate analysis conducted by Company Witness Vaughan removed the \$500,000 total annual subsidy from customers taking service under Tariff L.G.S.
5. Please identify each school district that is a member of KSBA and that receives service from Kentucky Power Company. For each identified school district please provide the following information:
  - a. Confirm that the school district currently imposes the utility gross receipts tax authorized by KRS 160.613;
  - b. For each such district imposing a utility gross receipts tax provide the current utility gross receipts tax rate and the tax rates applicable for fiscal years 2015-2016 and 2016-2017;
  - c. For each such district imposing a utility gross receipts tax please provide the utility gross receipts tax received by the district for fiscal years 2015-2016, 2016-2017, and 2017-2018 to date in connection with utility services provided by Kentucky Power.
6. Please reference page 13, lines 27-29, of testimony of Mr. Willhite. Please confirm that interested parties, including the KSBA, are authorized under the rules of the Federal Energy Regulatory Commission ("FERC") to challenge the return on equity established in the FERC-approved Rockport Unit Power Agreement.

Respectfully submitted,



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