

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

**KENTUCKY COMMERCIAL UTILITY CUSTOMERS, INC.'S
RESPONSES TO THE DATA REQUESTS BY KENTUCKY POWER**

Kentucky Commercial Utility Customers, Inc., ("KCUC") by counsel, provides the following responses to Kentucky Power Company's Data Requests to Kentucky Commercial Utility Customers, Inc. KCUC notes that witness Kevin C. Higgins is responsible for responding to the questions related to the information provided.

Respectfully submitted



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CERTIFICATE OF SERVICE

In accordance with 807 KAR 5:001, Section 8, I certify that the October 27, 2017, electronic filing of these Responses is a true and accurate copy of the same document being filed in paper medium; that the electronic filing will be transmitted to the Commission on October 27, 2017; that there are currently no parties that the Commission has excused from participation by electronic means in this proceeding; and that an original paper medium of the Responses and six copies will be delivered to the Commission within two business days.



Attorney for KCUC

1. Please provide all schedules, tables, and charts included in the testimony and exhibits to the testimony of Mr. Higgins in electronic format, with formulas intact and visible, and no pasted values.

Response: Please see attachment KCUC_R_KPCO_1_1_Attachment1 for the Excel format versions of Tables KCH-1 through KCH-5. Note that these tables contain summary data in the form of pasted values. The source data for the tables is referenced in KCUC's response to data request KPCo 1-2.

2. Please provide all workpapers, source documents, and electronic spreadsheets used in the development of the testimony of Mr. Higgins. The requested information, if so available, should be provided in an electronic format, with formulas intact and visible, and no pasted values.

Response: Please see the following attachments provided in KCUC's responses to Staff and AG data requests:

- KCUC_R_KPSC_1_2_Attachment1
- KCUC_R_KPSC_1_3_Attachment1
- KCUC_R_KPSC_1_4_Attachment1
- KCUC_R_KPSC_1_4_Attachment2
- KCUC_R_KPSC_1_4_Attachment3
- KCUC_R_KPSC_1_4_Attachment4
- KCUC_R_KPSC_1_4_Attachment5
- KCUC_R_AG_1_3_Attachment1
- KCUC_R_AG_1_4_Attachment1
- KCUC_R_AG_1_5_Attachment1
- KCUC_R_AG_1_5_Attachment2

3. Please refer to page 1 of Mr. Higgins' testimony. Please confirm that KCUC is not appearing in this proceeding on behalf of any commercial customers of Kentucky Power other than Appalachian Regional Healthcare, Inc. and BPM Lumber, LLC.

Response: KCUC is an association of commercial utility customers in Kentucky. KCUC appears in this proceeding to represent the interests of commercial customers on utility-related issues. KCUC has previously identified Appalachian Regional Healthcare, Inc., and BPM Lumber, LLC, as KCUC representative members to demonstrate an interest in the rates and service of Kentucky Power.

4. If KCUC is appearing on behalf of any other Kentucky Power commercial customers please identify the additional commercial customers on whose behalf KCUC is appearing.

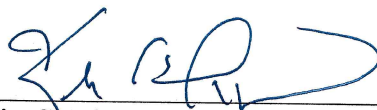
Response: Not applicable.

5. Please confirm that the position advocated for by KCUC would result in higher electricity rates for residential customers than those proposed by Kentucky Power.

Response: Denied. KCUC is not advocating for approval of KPCo's proposed overall revenue requirement. Mr. Higgins presented his revenue allocation proposal using the overall revenue requirement increase recommended by KPCo, which is a standard form of presentation. Mr. Higgins recommends a greater reduction in the Residential subsidy, which necessarily requires a greater Residential class increase at KPCo's proposed revenue requirement. At a lower overall revenue requirement, the rate increase for residential customers will be reduced under Mr. Higgins' approach.

AFFIDAVIT

The undersigned, Kevin C. Higgins, being duly sworn, deposes and says that he is a Principal of Energy Strategies L.L.C., and that he has supervised the preparation of the foregoing responses to the Request for Information issued by the Commission Staff, Attorney General, and Kentucky Power, and that the responses are true and accurate to the best of his knowledge, information, and belief formed after a reasonable inquiry



Kevin C. Higgins, Affiant

NOTARY CERTIFICATE

STATE OF UTAH

COUNTY OF SALT LAKE

Subscribed, acknowledged and sworn to before me by Kevin C. Higgins on this 27th
day of October, 2017.

My commission expires: June 6, 2018.

Millicent Pichardo

NOTARY PUBLIC

