

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 )

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**KENTUCKY COMMERCIAL UTILITY CUSTOMERS, INC.'S  
RESPONSES TO THE FIRST REQUEST FOR INFORMATION  
TO KCUC BY COMMISSION STAFF**

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Kentucky Commercial Utility Customers, Inc., ("KCUC") by counsel, provides the following responses to the First Request for Information to Kentucky Commercial Utility Customers, Inc. by Commission Staff. 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.



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*Attorney for KCUC*

1. Refer to the Direct Testimony of Kevin C. Higgins, page 17, Table KCH-5. Mr. Higgins recommends an allocation of revenue among the rate classes, but no rate design associated with the allocation. Confirm that the KCUC is not making any recommendations with respect to rate design.

Response: Confirmed.

2. Provide a copy of the cost-of-service study ("COSS") utilizing the 3CP approach in Excel spreadsheet format with all formulas intact and unprotected and with all columns and rows accessible.

Response: Please see attachment KCUC\_R\_KPSC\_1\_2\_Attachment1 for the COSS utilizing the 3CP approach. This study is based on the Company's COSS provided as KPCO\_SR\_KPSC\_1\_73\_Attachment97, but with the allocation of production demand costs changed from a 12CP to 3CP method.

3. Provide a copy of the COSS utilizing the Summer/Winter CP approach in Excel spreadsheet format with all formulas intact and unprotected and with all columns and rows accessible.

Response: Please see attachment KCUC\_R\_KPSC\_1\_3\_Attachment1 for the COSS utilizing the Summer/Winter CP approach. This study is based on the Company's COSS provided as KPCO\_SR\_KPSC\_1\_73\_Attachment97, but with the allocation of production demand costs changed from a 12CP to a Summer/Winter CP method.

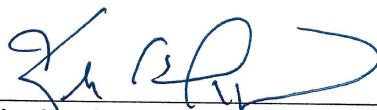
4. Provide all exhibits in Excel spreadsheet format with all formulas intact and unprotected and with all columns and rows accessible.

Response: Please see attachments KCUC\_R\_KPSC\_1\_4\_Attachment1, KCUC\_R\_KPSC\_1\_4\_Attachment2, KCUC\_R\_KPSC\_1\_4\_Attachment3, and KCUC\_R\_KPSC\_1\_4\_Attachment4 for Excel format versions of Exhibits KCH-1 through KCH-4, respectively.

Please see KCUC\_R\_KPSC\_1\_4\_Attachment5 for the workpaper supporting Exhibit KCH-4. Note that Exhibits KCH-2 and KCH-3 are summary exhibits that contain pasted values. The sources for pasted values in these exhibits are KCUC\_R\_KPSC\_1\_2\_Attachment1 and KCUC\_R\_KPSC\_1\_3\_Attachment1, respectively.

**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



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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 27<sup>th</sup>  
day of October, 2017.

My commission expires: June 6, 2018.

Millicent Pichardo  
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NOTARY PUBLIC

