

**COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION**

In the Matter of:

Riverside Generating Company, L.L.C.)	
COMPLAINANT)	
)	
v.)	Case No. 2017-00472
)	
Kentucky Power Company)	
DEFENDANT)	

Kentucky Power Company’s Data Requests To Riverside Generating, L.L.C.

Kentucky Power Company propounds the following data requests to be answered by
Riverside Generating Company, L.L.C.:

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 business 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 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 4-6 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. "Riverside" means Riverside Generating Company, L.L.C. and the entity referred to as LS Power on page one of Mr. Hammond's testimony in this matter.
13. "Non-Riverside" means any entity or entities other than Riverside as defined above.
14. "Foothills Facility" means the Foothills site, equipment, and facilities described by Mr. Hammond at pages 2-3 of his testimony.
15. "Zelda Facility" means the Zelda site, equipment, and facilities described by Mr. Hammond at page 3 of his testimony.

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 agreement or other required agreement for disclosure of any information or response for which confidential treatment is requested.

Data Requests

DR-1

Please refer to Mr. Hammond's testimony at pages 5-6.

- (a) Do the Zelda and Foothills Facilities described by Mr. Hammond house their control room or control rooms in a common building or other facility?
- (b) Please clearly indicate on an aerial photograph, map, or diagram of the Zelda and Foothills facilities the location or locations of the building or buildings used to house the control room or control rooms for the Zelda and Foothills Facilities?
- (c) Do the Zelda and Foothills Facilities described by Mr. Hammond house their administrative functions (including but not limited to offices, rest rooms, and breakrooms) or other similar activities in a common building or other facility?

(d) Please clearly indicate on an aerial photograph, map or diagram of the Zelda and Foothills Facilities the location or locations of the building or buildings used to house the administrative functions (including but not limited to offices, rest rooms, and breakrooms) or other similar activities for the Zelda and Foothills Facilities?

(e) Do the Zelda and Foothill Facilities receive natural gas transportation service from a single common carrier's natural gas pipeline?

(f) Please clearly indicate on an aerial photograph, map, or diagram of the Zelda and Foothills Facilities and any adjoining property necessary, the location or locations of the terminus or termini of the natural gas pipeline or pipelines that serves or serve the Zelda and Foothills Facilities? The map should clearly indicate in detail the terminus or termini of the common carrier or common carriers' pipeline or pipelines and the beginning of the gas line or lines owned by Riverside for both the Zelda and Foothills Facilities, and where the facilities used to supply natural gas to the Zelda and Foothills facilities enter the property of Zelda and/or Foothills Facilities.

(g) Please clearly indicate on an aerial photograph, map, or diagram of the Zelda and Foothills Facilities the location or locations of any other common or shared facility or facilities or building or buildings used in the operation of the Zelda and Foothills Facilities. Please label each such building and facility and clearly indicate its purpose.

(h) Do the Zelda and Foothill Facilities receive water service from a common hookup or line?

(i) Is water service separately metered for the Zelda and Foothills Facilities?

(j) Please clearly indicate on an aerial photograph, map, or diagram of the Zelda and Foothills Facilities and any adjoining property necessary, the location or locations of the terminus or termini of the water service provider's line or lines that serves or serve the Zelda and Foothills Facilities? The map should clearly indicate in detail the terminus or termini of the water service provider's water line or lines and the beginning of the water line or lines owned by Riverside for both the Zelda and Foothills Facilities, and where the facilities used to supply water to the Zelda and Foothills Facilities enter the property of Zelda and/or Foothills Facilities.

(k) Do the Zelda and Foothill Facilities receive sewerage service from a common hookup or line?

(l) Is sewerage service separately metered for the Zelda and Foothills Facilities?

(m) Please clearly indicate on an aerial photograph, map, or diagram of the Zelda and Foothills Facilities and any adjoining property necessary, the location or locations of the terminus or termini of the sewerage service provider's line or lines that serves or serve the Zelda and Foothills Facilities? The map should clearly indicate in detail the terminus or termini of the sewerage service provider's sewerage line or lines and the beginning of the sewerage line or lines owned by Riverside for both the Zelda and Foothills Facilities, and where the facilities used

to supply sewerage service to the Zelda and Foothills Facilities enter the property of Zelda and/or Foothills Facilities.

DR-2

Please refer to Mr. Hammond's testimony at page 4. Based on the actual 2017 operations of the Zelda Facility, please indicate on a monthly basis the electric energy that would have been supplied to the Zelda Facility by Kentucky Power if the relief Riverside seeks in this case had been granted effective December 31, 2016.

DR-3

Please refer to Mr. Hammond's testimony at page 4. Based on the actual 2017 operations of the Foothills Facility, please indicate on a monthly basis the electric energy that would have been supplied to the Foothills Facility by Kentucky Power if the relief Riverside seeks in this case had been granted effective December 31, 2106.

DR-4

Please refer to Mr. Hammond's testimony at page 3 and his reference to the "station power needs" of the Zelda and Foothills Facilities. For calendar year 2017 please provide by hour the "station power needs" of the Foothills Facility.

DR-5

Please refer to Mr. Hammond's testimony at page 3 and his reference to the "station power needs" of the Zelda and Foothills facilities. For calendar year 2017 please provide by hour the "station power needs" of the Zelda Facility.

DR-6

Please refer to the description of Riverside's generating assets at pages 2-3 of Mr. Hammond's testimony. For each of the past three yearly periods ended March 31 of the years 2016-2018 please provide the following information regarding the Zelda Facility:

(a) the number and identity of Riverside employees providing services, working at, stationed at, or otherwise affecting or involved with the operation of the Zelda Facility. For each such Riverside employee please provide separately by employee for each such yearly period whether he or she also provided services, worked at, was stationed at, or otherwise affected or was involved with the operation of the Foothills Facility;

(b) the number and identity of each Non-Riverside employee providing services, working at, stationed at, or otherwise affecting or involved with the operation of the Zelda Facility. For each such non-Riverside employee provide separately by employee for each such yearly period the following information:

(i) whether the Non-Riverside employee also provided services, worked at, was stationed at, or otherwise affected or was involved with the operation of the Foothills Facility;

(ii) the identity of the employer of the Non-Riverside employee; and

(iii) whether the employer of the Non-Riverside employee is owned by, shares common ownership with, or is otherwise affiliated with Riverside.

DR-7

Please refer to the description of Riverside's generating assets at pages 2-3 of Mr. Hammond's testimony. For each of the past three yearly periods ended March 31 of the years 2016-2018 please provide the following information regarding the Foothills Facility:

(a) the number and identity of Riverside employees providing services, working at, stationed at, or otherwise affecting or involved with the operation of the Foothills Facility. For each such Riverside employee please provide separately by employee for each such yearly period whether he or she also provided services, worked at, was stationed at, or otherwise affected or was involved with the operation of the Zelda Facility;

(b) the number and identity of each Non-Riverside employee providing services, working at, stationed at, or otherwise affecting or involved with the operation of the Foothills Facility. For each such non-Riverside employee provide separately by employee for each such yearly period the following information:

(i) whether the Non-Riverside employee also provided services, worked at, was stationed at, or otherwise affected or was involved with the operation of the Zelda Facility;

(ii) the identity of the employer of the Non-Riverside employee; and

(iii) whether the employer of the Non-Riverside employee is owned by, shares common ownership with, or is otherwise affiliated with Riverside.

DR-8

Please provide a copy of any deed or deeds of record evidencing the current ownership of the Zelda Facility.

DR-9

Please provide a copy of any deed or deeds of record evidencing the current ownership of the Foothills Facility.

DR-10

For each of the calendar years 2013 through 2017 did Riverside (or the entity procuring natural gas supply for the Foothills Facility) separately procure natural gas for the sole and separate use at the Foothills Facility.

DR-11

For each of the calendar years 2013 through 2017 did Riverside (or the entity procuring natural gas supply for the Zelda Facility) separately procure natural gas for the sole and separate use at the Zelda facility.

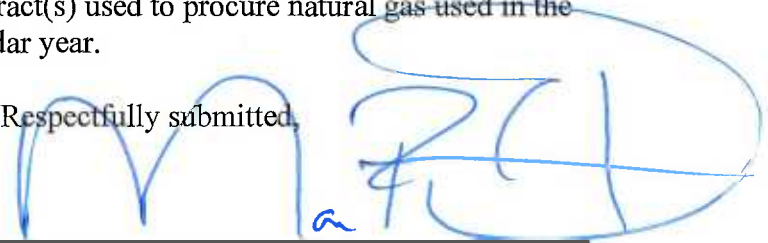
DR-12

For each of the calendar years 2013 through 2017 please provide the name or names appearing as the purchaser(s) on the contract(s) or North American Energy Standards Board agreement(s) or similar agreement(s) or contract(s) used to procure natural gas used in the operation of the Foothills Facility for that calendar year.

DR-13

For each of the calendar years 2013 through 2017 please provide the name or names appearing as the purchaser(s) on the contract(s) or North American Energy Standards Board agreement(s) or similar agreement(s) or contract(s) used to procure natural gas used in the operation of the Zelda Facility for that calendar year.

Respectfully submitted,



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