

Kentucky Power Company
KPSC Case No. 2017-00472
Commission Staff's First Set of Data Requests
Dated May 16, 2018

DATA REQUEST

1-001 Refer to the Direct Testimony of Ranie K. Wohnhas ("Wohnhas Testimony") at page 6, lines 9-15. State whether it is Mr. Wohnhas' testimony that if the lands upon which the Zelda and Foothills generating facilities are located are leased from different legal entities, then those two generating facilities cannot be classified as being "owned by the same individual business entity," as that phrase is set forth in Kentucky Power's Tariff N.U.G.

RESPONSE

No. Mr. Wohnhas' testimony is that the evidence of record indicates that the Zelda and Foothills facilities are owned or leased by different legal entities and hence do not qualify for the remote self-supply provisions of the Company's Tariff N.U.G.

Kentucky Power's requests for information eight and nine requested that Riverside provide "any deeds or deeds of record *evidencing the current ownership ...*" of the Zelda and Foothills facilities. (emphasis supplied). In response to the request for evidence of ownership of the two facilities, Riverside provided copies of a sublease between Gene A. Wilson and Pauletta M. Wilson (Lessor) and Lawrence County Riverside Trust 2000 in connection with the Zelda facility, and a deed between Earl W. Kenner, Jr. and Clara Webb Kinner as grantors and Foothills Generating, L.L.C. as grantee in connection with the Foothills facility. Further, in response to the Commission's request for information 8, Riverside provided "In-Lieu of Tax Payment Agreements" between the County of Lawrence, Kentucky and two separate entities: Foothills Generating, L.L.C. and Riverside Generating Company, L.L.C. The record thus indicates that the Foothills and Zelda facilities are owned or leased by at least two (and perhaps as many as four) separate entities.

Witness: Ranie K. Wohnhas

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DATA REQUEST

1-002 Refer to the Wohnhas Testimony, page 8, lines 5-12. Provide examples of meter inputs and outputs for a 15-minute period and the netting referenced on these lines. One example should show a net input, and the other example should show a net output. For each example, include the usage for each of the meters and the itemized amounts that would be billed to Riverside Generating Company, LLC ("Riverside ") for that 15-minute period.

RESPONSE

Please see KPCO_R_KPSC_1_2_Redacted_Attachment1.pdf for the requested information.

Witness: Ranie K. Wohnhas

370052684	10317	1745	15	RW	370053133	10317	1745	15	RW
370052684	10317	1800	15	RW	370053133	10317	1800	15	RW
370052684	10317	1815	15	RW	370053133	10317	1815	15	RW
370052684	10317	1830	15	RW	370053133	10317	1830	15	RW
370052684	10317	1845	15	RW	370053133	10317	1845	15	RW
370052684	10317	1900	15	RW	370053133	10317	1900	15	RW
370052684	10317	1915	15	RW	370053133	10317	1915	15	RW
370052684	10317	1930	15	RW	370053133	10317	1930	15	RW
370052684	10317	1945	15	RW	370053133	10317	1945	15	RW
370052684	10317	2000	15	RW	370053133	10317	2000	15	RW
370052684	10317	2015	15	RW	370053133	10317	2015	15	RW
370052684	10317	2030	15	RW	370053133	10317	2030	15	RW
370052684	10317	2045	15	RW	370053133	10317	2045	15	RW
370052684	10317	2100	15	RW	370053133	10317	2100	15	RW
370052684	10317	2115	15	RW	370053133	10317	2115	15	RW
370052684	10317	2130	15	RW	370053133	10317	2130	15	RW
370052684	10317	2145	15	RW	370053133	10317	2145	15	RW
370052684	10317	2200	15	RW	370053133	10317	2200	15	RW
370052684	10317	2215	15	RW	370053133	10317	2215	15	RW
370052684	10317	2230	15	RW	370053133	10317	2230	15	RW
370052684	10317	2245	15	RW	370053133	10317	2245	15	RW
370052684	10317	2300	15	RW	370053133	10317	2300	15	RW
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370052684	10417	130	15	RW	370053133	10417	130	15	RW
370052684	10417	145	15	RW	370053133	10417	145	15	RW
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370052684	113217	245	15	RW
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370052684	113217	315	15	RW
370052684	113217	330	15	RW
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370052684	11517	200	15	RW
370052684	11517	215	15	RW
370052684	11517	230	15	RW
370052684	11517	245	15	RW
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370052684	11517	800	15	RW
370052684	11517	815	15	RW
370052684	11517	830	15	RW
370052684	11517	845	15	RW
370052684	11517	900	15	RW
370052684	11517	915	15	RW
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370052684	11517	1115	15	RW
370052684	11517	1130	15	RW
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370052684	11517	1230	15	RW
370052684	11517	1245	15	RW
370052684	11517	1300	15	RW
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370052684	11517	1830	15	RW
370052684	11517	1845	15	RW
370052684	11517	1900	15	RW
370052684	11517	1915	15	RW
370052684	11517	1930	15	RW
370052684	11517	1945	15	RW
370052684	11517	2000	15	RW
370052684	11517	2015	15	RW
370052684	11517	2030	15	RW
370052684	11517	2045	15	RW
370052684	11517	2100	15	RW
370052684	11517	2115	15	RW
370052684	11517	2130	15	RW
370052684	11517	2145	15	RW
370052684	11517	2200	15	RW
370052684	11517	2215	15	RW
370052684	11517	2230	15	RW
370052684	11517	2245	15	RW
370052684	11517	2300	15	RW
370052684	11517	2315	15	RW
370052684	11517	2330	15	RW
370052684	11517	2345	15	RW
370052684	11517	2400	15	RW
370052684	11517	15	15	RW

370052684	11617	30	15	RW
370052684	11617	45	15	RW
370052684	11617	100	15	RW
370052684	11617	115	15	RW
370052684	11617	130	15	RW
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370052684	11617	200	15	RW
370052684	11617	215	15	RW
370052684	11617	230	15	RW
370052684	11617	245	15	RW
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370052684	11617	315	15	RW
370052684	11617	330	15	RW
370052684	11617	345	15	RW
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370052684	11617	1830	15	RW
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370052684	11617	2000	15	RW
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370052684	11617	2100	15	RW
370052684	11617	2115	15	RW
370052684	11617	2130	15	RW
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370052684	11617	2215	15	RW
370052684	11617	2230	15	RW
370052684	11617	2245	15	RW
370052684	11617	2300	15	RW

370052684	12017	1815	15	RW	370053133	12017	1815	15	RW
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370052684	12017	2245	15	RW	370053133	12017	2245	15	RW
370052684	12017	2300	15	RW	370053133	12017	2300	15	RW
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370052684	12017	845	15	RW	370053133	12017	845	15	RW
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370052684	12017	1015	15	RW	370053133	12017	1015	15	RW
370052684	12017	1030	15	RW	370053133	12017	1030	15	RW
370052684	12017	1045	15	RW	370053133	12017	1045	15	RW
370052684	12017	1100	15	RW	370053133	12017	1100	15	RW
370052684	12017	1115	15	RW	370053133	12017	1115	15	RW
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370052684	12017	1515	15	RW	370053133	12017	1515	15	RW
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370052684	12017	1615	15	RW	370053133	12017	1615	15	RW
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370052604	12317	1600	15	RW	12317	1600	15	RW
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370052604	12317	1645	15	RW	12317	1645	15	RW
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370052604	12317	1745	15	RW	12317	1745	15	RW
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370052604	12317	1900	15	RW	12317	1900	15	RW
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370052604	12317	1930	15	RW	12317	1930	15	RW
370052604	12317	1945	15	RW	12317	1945	15	RW
370052604	12317	2000	15	RW	12317	2000	15	RW
370052604	12317	2015	15	RW	12317	2015	15	RW
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370052604	12317	2045	15	RW	12317	2045	15	RW
370052604	12317	2100	15	RW	12317	2100	15	RW
370052604	12317	2115	15	RW	12317	2115	15	RW
370052604	12317	2130	15	RW	12317	2130	15	RW
370052604	12317	2145	15	RW	12317	2145	15	RW
370052604	12317	2200	15	RW	12317	2200	15	RW
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370052604	12317	2230	15	RW	12317	2230	15	RW
370052604	12317	2245	15	RW	12317	2245	15	RW
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370052604	12417	45	15	RW	12417	45	15	RW
370052604	12417	300	15	RW	12417	300	15	RW
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370052604	12417	145	15	RW	12417	145	15	RW
370052604	12417	200	15	RW	12417	200	15	RW
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370052604	12417	400	15	RW	12417	400	15	RW
370052604	12417	415	15	RW	12417	415	15	RW
370052604	12417	430	15	RW	12417	430	15	RW
370052604	12417	445	15	RW	12417	445	15	RW
370052604	12417	500	15	RW	12417	500	15	RW
370052604	12417	515	15	RW	12417	515	15	RW
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370052604	12417	545	15	RW	12417	545	15	RW
370052604	12417	600	15	RW	12417	600	15	RW
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370052604	12417	700	15	RW	12417	700	15	RW
370052604	12417	715	15	RW	12417	715	15	RW
370052604	12417	730	15	RW	12417	730	15	RW
370052604	12417	745	15	RW	12417	745	15	RW
370052604	12417	800	15	RW	12417	800	15	RW
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370052604	12417	915	15	RW	12417	915	15	RW
370052604	12417	930	15	RW	12417	930	15	RW
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370052604	12417	1000	15	RW	12417	1000	15	RW
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370052604	12417	1045	15	RW	12417	1045	15	RW
370052604	12417	1100	15	RW	12417	1100	15	RW
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370052604	12417	1130	15	RW	12417	1130	15	RW
370052604	12417	1145	15	RW	12417	1145	15	RW
370052604	12417	1200	15	RW	12417	1200	15	RW
370052604	12417	1215	15	RW	12417	1215	15	RW
370052604	12417	1230	15	RW	12417	1230	15	RW
370052604	12417	1245	15	RW	12417	1245	15	RW
370052604	12417	1300	15	RW	12417	1300	15	RW

Kentucky Power Company
KPSC Case No. 2017-00472
Commission Staff's First Set of Data Requests
Dated May 16, 2018

DATA REQUEST

1-003 Refer to the Wohnhas Testimony, page 16, line 20, through page 17, line 6. State whether the \$1.1 million per year referenced in the testimony represents the total annual amount billed to Riverside or only the energy portion of the annual amount billed to Riverside. If the former, confirm that, if the Commission were to determine that Riverside is qualified to remote self-supply under Tariff N.U.G, Kentucky Power would not receive revenues for customer or demand charges.

RESPONSE

The 2017 total billed amount for Riverside Generating Station LLC was \$1,088,887.59. The utility gross receipts license tax (Kentucky school tax) accounted for \$31,715.18 of the total leaving a balance of \$1,057,172.41. Service and Demand Charges totaled \$546,232.90 of the total billing.

If the Commission were to determine that Riverside is qualified to remote self-supply under Tariff N.U.G., Kentucky Power would no longer receive the entire amount, including revenues for customer or demand charges, under the retail tariff. All other items being equal, this would shift costs to other customers even though Kentucky Power assets would continue to be utilized by Riverside in the identical manner.

KPCO_R_KPSC_1_3_Attachment1.pdf is an itemized breakdown of 2017 Riverside billing.

Witness: Ranie K. Wohnhas

Riverside Generating Station 2017 Billing Summary	
Description	Totals
Service Charge	\$ 16,236.00
Energy Charge	\$ 296,532.32
On-Peak Demand Charge	\$ 451,795.50
Off-Peak Demand Charge	\$ 34,451.04
Minimum Demand Charge	\$ 42,309.64
Reactive Demand Charge	\$ 1,440.72
System Sales Clause	\$ 7,524.79
Big Sandy 1	\$ 61,422.02
Capacity Charge	\$ 7,180.51
Kentucky Economic Development Surcharge	\$ 1.80
Decommissioning Rider	\$ 37,322.62
Environmental Surcharge	\$ 95,189.12
Fuel Adjustment Clause	\$ 3,273.08
Kentucky Power Subtotal	\$ 1,057,172.41
School Tax	\$ 31,715.18
Total Billing	\$ 1,088,887.59

Kentucky Power Company
KPSC Case No. 2017-00472
Commission Staff's First Set of Data Requests
Dated May 16, 2018

DATA REQUEST

1-004 State whether it is Kentucky Power's belief that no common-owned generating units located adjacent to each other would qualify to remote self-supply under Tariff N.U.G.

RESPONSE

Yes. The reference to “not located on the site of the customer’s generator (*remote self-supply*)...” in Tariff N.U.G. means that adjacently located facilities do not qualify for remote self-supply.

Here, the record indicates that the subject generating facilities are owned or leased by separate entities and are either located on adjacent sites or located on a single site separated by a chain link fence.

Witness: Ranie K. Wohnhas

Kentucky Power Company
KPSC Case No. 2017-00472
Commission Staff's First Set of Data Requests
Dated May 16, 2018

DATA REQUEST

1-005 State whether Kentucky Power includes the self-supply provision in Tariff N.U.G. because PJM Interconnection LLC ("PJM") recognizes that Station Power may be remotely self-supplied by member generators and the concept is included in PJM's Open Access Transmission Tariff. If that is not the case, please explain.

RESPONSE

No. It does not. Tariff N.U.G, including the remote self-supply provision, was submitted by the Company and approved by the Commission (September 27, 2001) more than three years prior to AEP joining PJM Interconnection LLC ("PJM") on October 1, 2004. The tariff was intended to address the Company's understanding of then-existing FERC regulations and the advent of independent power producers.

Witness: Ranie K. Wohnhas

