

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) APPROVAL OF TARIFFS AND)	
RIDERS; (3) APPROVAL OF ACCOUNTING)	CASE NO.
PRACTICES TO ESTABLISH REGULATORY)	2020-00174
ASSETS AND LIABILITIES; (4) APPROVAL OF)	
A CERTIFICATE OF PUBLIC CONVENIENCE)	
AND NECESSITY; AND (5) ALL OTHER)	
REQUIRED APPROVALS AND RELIEF)	

**KENTUCKY SOLAR INDUSTRIES ASSOCIATION, INC.
SUPPLEMENTAL REQUESTS FOR INFORMATION
TO KENTUCKY POWER COMPANY**

Comes now the Kentucky Solar Industries Association, Inc. (KYSEIA), by and through counsel, and in accordance with the Public Service Commission's Order dated January 15, 2021, submits its supplemental requests for information to Kentucky Power Company (Kentucky Power).

- 1) In each case in which a request seeks information provided in response to a request of Commission Staff, reference to Kentucky Power response to the appropriate Staff request will be deemed a satisfactory response.
- 2) Please identify the Kentucky Power witness who will be prepared to answer questions concerning the request during an evidentiary hearing.
- 3) These requests shall be deemed continuing so as to require further and supplemental responses if Kentucky Power receives or generates additional

information within the scope of these request between the time of the response and the time of any evidentiary hearing held by the Commission.

- 4) If any request appears confusing, please request clarification directly from Counsel for KYSEIA.
- 5) To the extent that the specific document, workpaper, or information as requested does not exist, but a similar document, workpaper, or information does exist, provide the similar document, workpaper, or information.
- 6) To the extent that any request may be answered by way of a computer printout, please identify each variable contained in the printout which would not be self-evident to a person not familiar with the printout.
- 7) If Kentucky Power has any objections to any request on the grounds that the requested information is proprietary in nature, or for any other reason, please notify Counsel for KYSEIA as soon as possible.
- 8) For any document withheld on the basis of privilege, state the following: Date; author; addressee; indicated or blind copies; all person to whom distributed, shown, or explained; and the nature and legal basis for the privilege asserted.
- 9) In the event that any document called for has been destroyed or transferred beyond the control of Kentucky Power, state: The identity of the person by whom it was destroyed or transferred and the person authorizing the destruction or transfer; the time, place, and method of destruction or transfer; and, the reason(s) for its destruction or transfer. If destroyed or disposed of by operation of a retention policy, state the policy.

10)As Kentucky Power discovered errors in its filing and/or responses, please provide an update as soon as reasonable that identifies such errors and provide the document to support any changes.

WHEREFORE, KYSEIA submits its Supplemental Requests for Information to Kentucky Power Company.

Respectfully submitted,

/s/ David E. Spenard

Randal A. Strobo

Clay A. Barkley

David E. Spenard

STROBO BARKLEY PLLC

239 S. Fifth Street, Suite 917

Louisville, Kentucky 40202

Phone: 502-290-9751

Facsimile: 502-378-5395

Email: rstrobo@strobobarkley.com

Email: cbarkley@strobobarkley.com

Email: dspenard@strobobarkley.com

Counsel for KYSEIA

NOTICE AND CERTIFICATION FOR FILING

Undersigned counsel provides notice that the electronic version of the paper has been submitted to the Commission by uploading it using the Commission's E-Filing System on this 12th day of February 2021, and further certifies that the electronic version of the paper is a true and accurate copy of each paper filed in paper medium. Pursuant to the Commission's March 16, 2020, and March 24, 2020, Orders in Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus Covid-19*, the paper, in paper medium, will be filed at the Commission's offices within 30 days of the lifting of the state of emergency.

/s/ David E. Spenard

David E. Spenard

NOTICE REGARDING SERVICE

The Commission has not yet excused any party from electronic filing procedures for this case.

/s/ David E. Spenard
David E. Spenard

**KENTUCKY SOLAR INDUSTRIES ASSOCIATION, INC.
SUPPLEMENTAL REQUESTS FOR INFORMATION
TO KENTUCKY POWER COMPANY**

1. How has Kentucky Power Company communicated its decision to implement Tariff NMS II to its customers, including prospective net metering customers? Provide a copy of each written communication including but not limited to press releases, advertisements, bill inserts, and notices placed on the Company's website.
2. Were any applications to Kentucky Power Company for net metering service pending when Kentucky Power Company placed its Tariff NMS II into effect as of January 14, 2021? If yes, state, by rate class, the number of applications then-pending and the associated capacity additions for the net metering applications pending on January 14, 2021.
3. Since January 14, 2021, have any application to Kentucky Power Company for net metering service been submitted? If yes, state, by rate class, the number of applications submitted and the associated capacity additions for the applications. This is a continuing request; please update the request through the end of the briefing period for the additional proceedings.
4. Has the Company created any forecasts, projections, or analysis regarding the number of customers and/or the amount of capacity it anticipates will take service under Tariff NMS II in current and future years? If so, please provide copies of all such analysis, including all supporting workpapers and Excel spreadsheets in executable format with all formulas and file linkages intact.
5. Please provide the customer charge annual billing units and the adopted customer charges for each for each residential rate schedule (RS, RS-D, RS-TOD, and RS-TOD2). Your response should provide information sufficient to allow a calculation of total annual revenue associated with adopted customer charges for the residential class as a whole.
6. Please refer to Exhibit AEV_R_7, in the tab labeled PK WP, and explain why the dates and times used to define a solar contribution to monthly coincident peaks are different from each other for Distribution and Generation & Transmission.
7. Please refer to the Application, the Direct Testimony of Jason M. Stegall, Exhibit JMS-1 at page 11 [PDF 176 of 333) in the section detailing the calculation of Calculation of Proposed Revenues. Please explain:
 - a. Why the line detailing proposed revenues for BULKTRAN and SUBTRAN show a negative amount in the Total Retail column.
 - b. Why the line detailing proposed revenues for BULKTRAN and SUBTRAN show a negative amount in the RS column.
 - c. Why other columns for non-RS rate classes show positive amounts for BULKTRAN and SUBTRAN proposed revenues.

8. Please refer to Kentucky Power Company Rebuttal Exhibit AEV_R_7 [PDF 270 of 273] and Kentucky Power Company response to KYSEIA 1-3, KPCO_R_KYSEIA_1_3_Attachment1 showing Company Witness Vaughan's derivation of the costs avoided by Kentucky Power due to the installation of net metered solar generation.
 - a. Please confirm that the analysis provided in Exhibit AEV_R_7 is confined to the Company's Class Cost of Service Study and does not incorporate effects of distributed generation in reducing the amounts of costs allocated to Kentucky Power on the basis of its Jurisdictional Cost of Service Study. If your response is anything other than an unqualified confirmation, please explain.
 - b. Please confirm that KPCO_R_KYSEIA_1_3_Attachment1 shows that the installation of net metered solar installations produce a reduction in LSE OATT costs allocated to Kentucky Power.

9. Please refer to the Rebuttal Testimony of Alex E. Vaughan ("Vaughan Rebuttal") at pages 36-37 [PDF 248, 249 of 273] discussing his analysis of how the installation of customer-sited solar affects class cost of service. At page 37 lines 3 -7 Witness Vaughan states "Even given the unreasonable assumption that the shifted costs simply disappear for a class, the net increase in rates that would result shows that the reduction in billing units is greater than the inter-class cost shift, resulting in higher rates for all customers within that class."

Notwithstanding Mr. Vaughan's apparent objection to the conceptual framework for such an analysis (i.e., the "unreasonable assumption"), does Mr. Vaughan agree that if the results of the analysis shown on page 36 of Vaughan Rebuttal showed a *decrease* in the NMS Class Avg Realization Rate \$/kWh, this *decrease* would translate to *lower* rates for customers within that class. For the purpose of clarity, this request is not asking whether Mr. Vaughan agrees with the analytical framework; rather, it is asking how Mr. Vaughn would interpret the results of the analysis if those results were different.