

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.
POST-HEARING REQUESTS FOR INFORMATION
TO KENTUCKY POWER COMPANY**

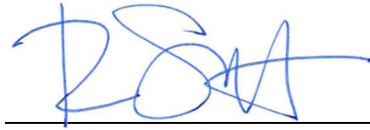
Comes now the Kentucky Solar Industries Association, Inc. (KYSEIA), by and through counsel, and pursuant to the Public Service Commission’s Order dated November 24, 2020, submits its post-hearing requests for information to the Kentucky Power Company (KPC).

- 1) In each case in which a request seeks information provided in response to a request of Commission Staff, reference to the KPC response to the appropriate Staff request will be deemed a satisfactory response.
- 2) Please identify the KPC witness responsible for providing the information.
- 3) These requests shall be deemed continuing so as to require further and supplemental responses if KPC receives or generates additional information within the scope of these requests between the time of the response and the conclusion of this proceeding.
- 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 KPC 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 KPC, 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 KPC discovers 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 Post-Hearing Requests for Information to the Kentucky Power Company.

Respectfully submitted,



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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 25th day of November, 2020, 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.



Randal A. Strobo

CERTIFICATE OF SERVICE

Undersigned counsel certifies that it has transmitted on this 25th day of November 2020, via electronic mail messages, these Post-Hearing Requests for Information and the accompanying Read1st file for the electronic filing to the parties of record at the electronic mail addresses listed below. The Commission has not excused any party from electronic filing procedures for this case.

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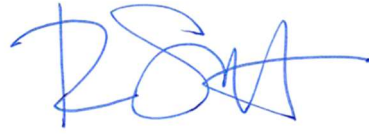
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A handwritten signature in blue ink, appearing to read 'R. Strobo', with a horizontal line extending to the right from the end of the signature.

Randal A. Strobo

KENTUCKY SOLAR INDUSTRIES ASSOCIATION, INC.
POST-HEARING REQUESTS FOR INFORMATION TO KPC

1. Refer to the Rebuttal Testimony of Alex E. Vaughn (“Mr. Vaughn”). Please provide an illustration for Virginia Appalachian Power similar in format and for the same time period as figures as AEV-R1 and AEV-R2 appearing on pages 16 and 17 of Mr. Vaughn’s rebuttal testimony.

2. Please provide the associated workpapers that illustrate the slope of the trend line for figures AEV-R1, AEV-R2, and, also the slope of the trend line for the figure for Virginia Appalachian Power requested under part 1 of this data request.