

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 second supplemental requests for information to Kentucky Power Company (Kentucky Power) for the additional proceedings.

- 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 8<sup>th</sup> day of March 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. Please refer to the Supplemental Testimony of Alex E. Vaughan (“Vaughan Supplemental”) at page 4, line 21 through page 5, line 2 stating “The Company’s test year net metering customers are receiving approximately \$40,000 in annual subsidies from other customers. During the test year, the Company had 46 customers on tariff NMS, which means that other customers are paying roughly \$870 per year per system in subsidies under tariff NMS’s existing one-to-one net metering provisions.”
  - a. Please explain in detail how the \$40,000 annual subsidy Mr. Vaughn claims exists is derived from the class cost of service study.
  - b. Please provide all of Mr. Vaughn’s workpapers in executable spreadsheet format with all formulas and file linkages intact and all assumptions documented, showing how Mr. Vaughn derives the \$40,000 amount from the class cost of service study results.
2. Please refer to Vaughan Supplemental at page 3. Please provide complete workpapers associated with the Table shown on page 3.
3. Please explain in detail how the Company’s class cost of service analysis influences the design of its NMS II proposal. If your response is anything other than an admission that the class cost of service study results have had no role in influencing the design of the Company’s NMS II proposal, please explain in detail. Your explanation should expressly address:
  - a. How the class cost of service study could have influenced the design, given that it was not presented until rebuttal and supplemental testimony.
  - b. How the Company designed the NMS II proposal around the results of the class cost of service study to avoid producing a result where NMS II customers subsidize non-participant customers.
4. Please confirm that the results of Mr. Vaughan’s analysis presented in the table at page 3 of Vaughan Supplemental are specific only to the present NMS I tariff.
5. Please explain in detail how the table presented at page 3 of Vaughan Supplemental would change under the Company’s proposed NMS II tariff and provide an updated table. For instance, explain how the class rate of return for residential and C&I NMS customers would change under NMS II?
6. Please reference the Supplemental Workpapers of Jason M. Stegall (“JMS\_CCOS\_Workpaper\_w\_NMS\_Adjustments”).

- a. Please confirm that Mr. Stegall used the class average load shapes for residential and GS secondary customers in his analysis rather than load shapes specific to the Company's net metered customers.
  - b. Please provide workpapers associated with the hard-coded values listed for Res NMS and C&I NMS in each tab (e.g., LA Sec Loads, Energy Allocator, etc.) in columns E and F.
  - c. In the Energy Allocator tab, does the loss factor adjustment shown on rows 28-31 reflect secondary, primary, and transmission losses? Please in detail how the loss factors were derived and applied.
  - d. Please explain in detail why the CCOS identifies 27 residential net metering and 8 C&I net metering customers (i.e., 35 total customers, see "Customer Allocators" tab), whereas Witness Vaughn (p. S4-S5) states in his Supplemental Testimony that there are 46 customers on tariff NMS during the test year.
7. For each customer class in which the Company has one or more net metering customers taking service, as well as the Residential NMS and C&I NMS classes separately, identify the annual load profile on a 15-minute increment basis. Provide the data in an executable format with all cells unlocked and viewable with all formulas intact.
8. Please reference the Supplemental Testimony of Jason M. Stegall ("Stegall Supplemental") in the table at page 4.
  - a. The bottom row of the table indicates that the total retail revenue requirement remains the same in Mr. Stegall's analysis. Please confirm that the Mr. Stegall did not adjust the retail revenue requirement to reflect changes in the jurisdictional allocation of costs attributable to reductions in coincident peaks produced by net metering customers.
  - b. Please confirm or deny that a reduction to monthly contribution to coincident peaks of a retail class would, all other things being equal, have the effect of reducing the Kentucky-jurisdictional retail revenue requirement. For instance, if a class reduces its contribution to monthly peaks by 1 MW on average while all other retail classes retain the same peak contributions, is it not true that the overall retail jurisdictional revenue requirement would be incrementally lower while the non-Kentucky jurisdictional revenue requirement would be higher? If your response is anything other than an unqualified confirmation of this effect, please explain in detail.
9. Identify all costs the Company has spent to date on implementing tariff NMS II, including the costs associated with staff time spent and costs related to modifying the Company's billing system, tariffs, website, and customer and investor communications, to the extent any or all of this information is tracked or can be estimated by the Company.
10. Identify all of the costs incurred by the Company related to preparing and filing supplemental testimony in this proceeding, including all costs associated with

preparing testimony and exhibits filed on February 25, 2021. Please confirm or refute that it is the Company's intention to request recovery of these costs from ratepayers in the future.